

City of Santa Barbara

**Sandman Inn
Redevelopment Project
3714-3744 State Street
Final EIR
Volume I**

Prepared for:

Community Development Department/Planning Division
630 Garden Street
Santa Barbara, CA 93102-1990
Ms. Allison De Busk, Project Planner



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November 2009

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TABLE OF CONTENTS

Volume I

Section	Page
1.0 Executive Summary	1.0-1
2.0 Introduction	2.0-1
3.0 Project Description	3.0-1
4.0 Cumulative Scenario.....	4.0-1
5.0 Land Use and Policy Consistency	5.0-1
6.0 Air Quality.....	6.0-1
7.0 Transportation and Circulation.....	7.0-1
8.0 Visual Aesthetics	8.0-1
9.0 Alternatives	9.0-1
10.0 Long-Term Implications of the Project.....	10.0-1
11.0 Effects Found Not to be Significant	11.0-1
12.0 Comments and Responses to Comments.....	12.0-1
13.0 Corrections and Additions to the Draft EIR.....	13.0-1
14.0 Mitigation Monitoring Program.....	14.0-1
15.0 Organizations and Persons Consulted	15.0-1
16.0 References.....	16.0-1
17.0 List of Preparers.....	17.0-1

Volume II

Appendices

- 2.0 Notice of Preparation (NOP), Initial Study, and Responses to the NOP
 - Notice of Preparation
 - Initial Study
 - Responses to the Notice of Preparation
- 5.0 Supplemental Policy Consistency Analysis
- 6.0 Air Quality
 - Proposed Project Construction Emissions
 - Applicant's Alternative Construction Emissions
 - Proposed Project Greenhouse Gas Emissions
 - Applicant's Alternative Greenhouse Gas Emissions
 - Existing Greenhouse Gas Emissions
 - Sandman Inn Redevelopment Project Screening Health Risk Assessment, December 2008
 - State Regulatory Setting for Global Climate Change and Greenhouse Gas Emissions
- 7.0 Traffic Study
- 8.0 ABR Guidelines Consistency

LIST OF FIGURES

Figure	Page
3.0-1 Project Location	3.0-5
3.0-2 Local Vicinity Map	3.0-6
3.0-3 Existing Parcel Map.....	3.0-7
3.0-4 Neighborhood Map.....	3.0-8
3.0-5 Aerial of Project Area.....	3.0-11
3.0-6 Haul Route	3.0-14
3.0-7 Proposed Project Site Plan.....	3.0-15
3.0-8 Proposed Project Elevation Diagrams.....	3.0-16
3.0-9 Proposed Project Elevation Diagrams	3.0-17
3.0-10 Proposed Project Underground Structure Parking Plan.....	3.0-18
3.0-11 Proposed Project Landscape Plan	3.0-21
3.0-12 Applicant’s Alternative Site Plan	3.0-24
3.0-13 Applicant’s Alternative Elevation Diagrams.....	3.0-25
3.0-14 Applicant’s Alternative Underground Parking Structure Plan	3.0-26
3.0-15 Applicant’s Alternative Landscape Plan.....	3.0-27
3.0-16 Project Schedule and Phasing.....	3.0-32
5.0-1 Existing General Plan Designations.....	5.0-5
5.0-2 Existing Zoning.....	5.0-6
5.0-3 Project Vicinity Land Use Designations	5.0-9
5.0-4 Project Plan with Buffer Designation.....	5.0-10
7.0-1 Existing Year 2008 Peak Hour Traffic Volumes	7.0-11
7.0-2 Project Traffic Directional Distribution	7.0-24
7.0-3 Net Project Peak Hour Traffic Volumes.....	7.0-25
7.0-4 Total Future with Project Peak Hour Traffic Volumes.....	7.0-26
7.0-5 Cumulative Project Peak Hour Traffic Volumes.....	7.0-31
7.0-6 Total Future Cumulative Peak Hour Traffic Volumes Without Proposed Project.....	7.0-34
7.0-7 Total Future Cumulative Peak Hour Traffic Volumes With Proposed Project.....	7.0-35
7.0-8 Existing and Proposed Project Access Driveways and Median Configuration.....	7.0-38
7.0-9 Existing No U-Turn Signage	7.0-41
7.0-10 PM Peak Hour Stacking in Westbound Left-Turn Lane, State Street and Hitchcock Way.....	7.0-44
7.0-11 Proposed Town and Country Apartment San Remo Access Sight Lines.....	7.0-49
7.0-12 Parking Access Review for Proposed Project Residential Garage.....	7.0-54
7.0-13 Parking Access Review for Applicant’s Alternative Residential Garage	7.0-59
8.0-1 Surrounding Development Photograph Locations.....	8.0-38
8.0-2 Surrounding Development – North of State Street.....	8.0-39
8.0-3 Surrounding Development – North of State Street.....	8.0-40
8.0-4 Surrounding Development – South of State Street.....	8.0-41
8.0-5 Surrounding Development – South of State Street.....	8.0-42
8.0-6 Existing Project Site Photograph Locations	8.0-43
8.0-7 Existing Site Photographs.....	8.0-44
8.0-8a Existing On-site Photographs	8.0-45
8.0-8b Existing On-site Photographs	8.0-46
8.0-9 Town and Country Apartment Photographs	8.0-47

LIST OF FIGURES

Figure	Page
8.0-10 3715 San Remo Drive Duplex Photographs.....	8.0-48
8.0-11 Massing Diagram Photograph Locations.....	8.0-49
8.0-12 Proposed Project Massing Diagrams – Locations 1–3	8.0-50
8.0-13 Proposed Project Massing Diagrams – Locations 4–6	8.0-51
8.0-14 Applicant’s Alternatives Massing Diagrams – Locations 1–3	8.0-52
8.0-15 Applicant’s Alternatives Massing Diagrams – Locations 4–6	8.0-53
8.0-16 Visual Simulation Photograph Locations.....	8.0-54
8.0-17 Visual Simulations of Proposed Project –Location 1	8.0-55
8.0-18 Visual Simulations of Proposed Project –Location 2	8.0-56
8.0-19 Visual Simulations of Proposed Project –Location 3	8.0-57
8.0-20 Visual Simulations of Applicant’s Alternative –Location 1.....	8.0-58
8.0-21 Visual Simulations of Applicant’s Alternative –Location 2.....	8.0-59
8.0-22 Visual Simulations of Applicant’s Alternative –Location 3.....	8.0-60
9.0-1 Alternative Design Massing Diagram – Proposed Project.....	9.0-5
9.0-2 Applicant’s Alternative Visual Simulations (from Location 2) with Retained Trees.....	9.0-8
10.0-1 Shade & Shadow Analysis: Proposed Project – June 21 Conditions	10.0-13
10.0-2 Shade & Shadow Analysis: Proposed Project – December 21 Conditions	10.0-14
10.0-3 Shade & Shadow Analysis: Applicants Alternative – June 21 Conditions	10.0-15
10.0-4 Shade & Shadow Analysis: Applicants Alternative – December 21 Conditions	10.0-16
12.0-1 Upper State Street Urban Design Recommendations Map	12.0-118

LIST OF TABLES

Section	Page
1.0-1 Comparison of Alternatives.....	1.0-10
2.0-1 Summary of NOP Comments.....	2.0-4
3.0-1 Summary of Property Characteristics.....	3.0-4
3.0-2 Summary of Project Characteristics.....	3.0-10
3.0-3 Proposed Lot Line Adjustments.....	3.0-13
3.0-4 Construction Program Information.....	3.0-29
4.0-1 Cumulative Projects Within 1 Mile Radius of the Project Site.....	4.0-3
4.0-2 Cumulative Projects Greater Than 1 Mile Radius of the Project Site.....	4.0-6
6.0-1 Ambient Air Quality Standards.....	6.0-2
6.0-2 Summary of Health Effects of the Major Criteria Air Pollutants.....	6.0-4
6.0-3 Ambient Air Quality at Monitoring Station in Project Vicinity.....	6.0-7
6.0-4 Attainment Status of Criteria Pollutants (South Central Coast Air Basin – Santa Barbara County).....	6.0-10
6.0-5 Estimated Project Construction Emissions – Proposed Project.....	6.0-20
6.0-6 Proposed Project Cancer Risks – Proposed Project.....	6.0-21
6.0-7 Chronic Hazard Index – Proposed Project.....	6.0-22
6.0-8 Estimated Construction Emissions – Applicant’s Alternative.....	6.0-23
6.0-9 Project Cancer Risks – Applicant’s Alternative.....	6.0-24
6.0-10 Project Chronic Hazard Index – Applicant’s Alternative.....	6.0-24
6.0-11 GHG Sources in California.....	6.0-34
6.0-12 Estimated Existing Annual GHG Emissions.....	6.0-36
6.0-13 Estimated Construction GHG Emissions - Proposed Project.....	6.0-38
6.0-14 Estimated Annual GHG Emissions – Proposed Project.....	6.0-39
6.0-15 Estimated Construction GHG Emissions – Applicant’s Alternative.....	6.0-40
6.0-16 Estimated Annual GHG Emissions – Applicant’s Alternative.....	6.0-41
7.0-1 Intersection Traffic Count Sources.....	7.0-8
7.0-2 Existing Intersection Levels of Service.....	7.0-8
7.0-3 Level of Service Descriptions.....	7.0-15
7.0-4 Relationship of LOS to ICU and Delay.....	7.0-16
7.0-5 Project Trip Generation Comparison.....	7.0-20
7.0-6 Project Trip Distribution.....	7.0-22
7.0-7 Future Plus Project Intersection Levels of Service.....	7.0-27
7.0-8 Applicant’s Alternative Project Trip Generation Comparison.....	7.0-29
7.0-9 Future Plus Project Plus Cumulative Intersection Levels of Service.....	7.0-32
7.0-10 Proposed Project Required and Proposed Parking Supply.....	7.0-50
7.0-11 Applicant’s Alternative Required and Proposed Parking Supply.....	7.0-56
7.0-12 Construction Trip Generation Comparison.....	7.0-65
9.0-1 Comparison of Alternatives.....	9.0-18
10.0-1 California Electrical Consumption by Sector 1980 to 2005.....	10.0-10
10.0-2 Project Smart Growth Principles within the Sandman Inn Redevelopment & Townhome Project.....	10.0-22
10.0-3 Preliminary Green Santa Barbara Checklist Considerations – Sandman Inn Redevelopment Project Site Selection and Development.....	10.0-24
14.0-1 Sandman Inn Redevelopment Project Mitigation Monitoring and Reporting Program Matrix.....	14.0-4

1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION AND PURPOSE

This ~~draft~~-final environmental impact report (~~DEIR~~EIR) has been prepared to evaluate specific environmental impacts associated with the proposed Sandman Inn Redevelopment Project, also referred to herein as the project, in the City of Santa Barbara. The City of Santa Barbara is the Lead Agency for the environmental review and, after the comment/response process, is the certifying agency for the final EIR (~~FEIR~~).

An Initial Study, prepared by the City of Santa Barbara, indicated that the proposed project may have potentially significant effects on aesthetics, air quality (construction emissions) and transportation /circulation. Because of these potential effects, an EIR is required to more fully evaluate potential adverse environmental impacts that may result from development of the project.

This ~~DEIR~~-final EIR has been prepared in accordance with the California Environmental Quality Act of 1970 (CEQA), as amended (Public Resources Code Section 21000 et. seq.), and the *State CEQA Guidelines* for Implementation of CEQA (California Code of Regulations, Title 14, Section 15000 et seq.). This ~~DEIR~~ final EIR also complies with the City of Santa Barbara Guidelines for Implementation of the California Environmental Quality Act.

The purpose of this ~~DEIR~~-final EIR is to inform decision makers and the general public of any significant adverse environmental impacts that may be associated with the planning, construction or operation of the project, and to identify appropriate feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts.

The environmental review process for the Sandman Inn Redevelopment Project provides a co-equal level of analysis for the proposed project and the applicant's alternative. The proposed project includes a hotel and residential condominium complex while the applicant's alternative replaces the proposed hotel with two office buildings. The co-equal level of analysis provides the same level of detail and analysis for both the proposed project and the applicant's alternative for each of the issues that were determined in the Initial Study to have the potential for significant impacts. By completing the environmental review on both, this final EIR provides flexibility to the City in approving either proposal without necessitating additional environmental review.

This ~~DEIR~~-final EIR also includes an evaluation of reasonable alternatives to the proposed project, including the No Project/No Development Alternative and three other alternatives.

1.2 Project Location

The project site is located in the City of Santa Barbara in southern Santa Barbara County. Regional access to the project site is provided by US Highway 101 (US 101), as shown in **Figure 3.0-1, Project Location**. The main project site is located on State Street several blocks north of US 101 between North Hope Avenue and North Ontare Road, as shown in **Figure 3.0-2, Local Vicinity Map**. Local access to the main project site is currently provided from State Street.

The main project site is 4.58 acres and is composed of two adjacent parcels (APNs 053-300-023 [1.36 acres] and 053-300-31 [3.22 acres]; 3714, 3740, and 3744 State Street) that are proposed for redevelopment with either a hotel or office buildings, and 73 residential condominiums. The project also involves two additional parcels (APNs 053-300-032, [1.0 acre] Town & Country Apartments at 3730 State Street and 053-222-010, [0.20 acres] an existing duplex at 3715 San Remo Drive).

1.3 Project Description

The project includes the following components:

- Demolition of the existing 113-room Sandman Inn hotel, adjacent restaurant and all site improvements.
- Construction of either:
 - **Proposed Project:** construction of a 106-room hotel and 73 residential condominium units. This would include a total of 291 parking spaces with 1 at-grade and 110 underground parking spaces for the hotel component, 163 underground parking spaces for the residential component, and 17 at-grade common/shared spaces; or
 - **Applicant's Alternative:** construction of approximately 14,254 square feet of office space and 73 residential condominium units. The proposed office use would be split between two separate buildings. This would include a total of 237 parking spaces with 66 spaces for the office component (61 spaces at-grade and 5 spaces underground in the residential parking garage) and 162 underground parking spaces for the residential component, plus 9 at-grade common/shared spaces.
- Construction of a new driveway access from the Town & Country Apartments to San Remo Drive, necessitating demolition of an existing residential unit.

1.4 Project Objectives

The objectives for the Sandman Inn Redevelopment Project are as follows:

- Provide an in-fill redevelopment project that is consistent with the City's existing General Plan vision, specifically as it applies to the North State neighborhood, and taking into consideration direction given in the City's General Plan Update: Policy Preferences Report (December 2008);
- Provide increased housing opportunities, including affordable housing, which are located on the City's major transportation corridor and which are in close proximity to retail and service facilities;
- Incorporate the direction provided in the *Upper State Street Study* (USSS) as appropriate including project/site design, access and parking;
- Redevelop an existing underutilized commercial property with improvements which will maintain or enhance views of the mountains;
- Redevelop an existing underutilized commercial property to a mixed use project consisting of commercial and residential units; and
- Eliminate access conflicts between the Town & Country Apartments and the project parcels fronting State Street.

1.5 Areas of Controversy and Issues to be Resolved

Section 15123 of the *State CEQA Guidelines* requires that the EIR Summary identify areas of controversy, including issues raised by other agencies and the public. Areas of controversy identified during the development of the EIR include the following:

- Overall size, mass and height of the proposed project
- Architectural design and site layout
- Minimize parking effects on the adjacent residential neighborhood
- Construction impacts including dust and diesel emissions, traffic and parking effects
- Project traffic impacts to several study area intersections

This ~~DEIR~~final EIR addresses each of these issues and concerns in detail. This ~~DEIR~~final EIR examines construction-related impacts, long-term impacts, and cumulative environmental impacts. It also identifies significant environmental impacts, and proposes mitigation measures designed to reduce or eliminate potentially significant impacts.

1.6 Summary of Environmental Impacts

For each impact identified in the EIR, a statement of the level of significance of the impact is provided. Impacts are categorized in the following categories:

- a. Class I Impacts – Significant unavoidable adverse impacts for which the decision maker must adopt a statement of overriding consideration.
- b. Class II Impacts – Significant environmental impacts that can be feasibly mitigated or avoided for which the decision maker must adopt findings and required mitigation measures.
- c. Class III Impacts – Adverse impacts found not to be significant for which the decision maker does not have to adopt findings under CEQA.
- d. Class IV Impacts – Impacts beneficial to the environment.

Impacts found to be Less than Significant

In the course of this evaluation, certain impacts were found to be less than significant because the project's characteristics would not create such impacts (Class III) or impacts could be reduced to be less than significant with mitigation (Class II). The effects determined not to be significant are not required to be included in primary analysis sections of the draft EIR.

The following issues were determined to be less than significant for both the proposed project and applicant's alternative (refer to **Section 11.0** for a complete discussion):

- Aesthetics – light and glare (Class III)
- Air Quality – except construction-related impacts (Class III)
- Biological Resources (Class III)
- Cultural Resources (Class III)
- Geophysical Conditions (Class II)
- Hazards (Class III)
- Noise (Class II)
- Population and Housing (Class III)
- Public Services (Class II)
- Recreation (Class III)

- Transportation and Circulation – emergency access and pedestrian hazards (Class III)
- Water Environment (Class II)

Impacts Evaluated in the EIR

In addition, as a result of evaluation in this EIR, the following were determined to be less than significant (Class III) or less than significant with mitigation (Class II) for either the proposed project or the applicant's alternative:

- Air Quality – construction related impacts;
- Transportation and Circulation – impacts during construction and operation, and impacts related to parking; and
- Visual Aesthetics.

Summary of Air Quality Impacts

Construction Air Quality Impacts

Project-specific and cumulative construction air quality impacts would be *less than significant* (Class III) for either the proposed project or the applicant's alternative. Recommended mitigation measures, which are also standard conditions of approval in the City, have been identified that would minimize construction-related emissions associated with dust, equipment exhaust, and architectural coating application.

Greenhouse Gas Impacts

While no significance threshold has been formally adopted by any state or local agency, cumulative impacts have been addressed in accordance with preliminary and draft guidance documents from the California Air Resources Board (CARB) and Governor's Office of Planning and Research (OPR). Both CARB and OPR have proposed that projects reduce energy consumption relative to "business as usual" – that is, energy consumption rates that would occur in the absence of green building standards or other energy efficiency regulations enacted to reduce greenhouse gas emissions. The proposed project and applicant's alternative would comply with the requirements of the City's energy ordinance. The project would be located on a transit corridor and would not add substantial vehicle miles traveled. The greenhouse gas emissions of either the proposed project or applicant's alternative would be minimal.

Summary of Traffic, Circulation and Parking Impacts

Project Traffic Impacts

The proposed project would generate approximately 215 fewer daily trips, 5 fewer PM peak hour trips, and 25 additional AM peak hour trips than existing conditions. The applicant's alternative would generate approximately 852 fewer daily trips, 33 fewer PM peak hour trips, and 5 fewer AM peak hour trips than existing conditions. Traffic counts at nearby intersections show that the level of service in the AM peak hour is acceptable for existing, future, and cumulative conditions. Therefore, either the proposed project or the applicant's alternative would result in *less than significant* (Class III) project-related and cumulative traffic impacts on State Street and at area intersections and roadways.

State Street Residential Access

It would be physically feasible to allow left-turn access in to the proposed residential access drive on State Street. Additionally, allowing left turns into the residential access drive would not result in a significant environmental impact related to traffic or circulation. Impacts are *less than significant* (Class III).

~~However, the modification of the existing median and provisions for eastbound left turns into the site would not be compatible with the guidelines and principals of the USSS and would limit the City's ability to provide future improvements at the Hitchcock Way intersection. Because the recommendations of the USSS were adopted in order to improve circulation, traffic operations, and safety within the Upper State Street corridor for automobiles, pedestrians, and bicyclists, and the proposal for a left turn lane conflicts with this direction, it is recommended that the proposed residential left-turn access not be provided.~~

Impacts of Apartment Driveway on San Remo

The proposed access and circulation change for the Town & Country Apartments will have no significant capacity impacts on San Remo Drive; however, the design of the access drive must take into consideration the existing physical conditions along the street and on both sides of the proposed driveway. The current design raises concerns relative to safety and adequate sight lines. Therefore, safety due to the new Town & Country Apartment access driveway is considered a *potentially significant, but mitigable* (Class II) impact that can be resolved with design measures to ensure adequate sight lines.

Parking Supply, Access and Circulation

The residential garage plan for the proposed project has several operational issues and if spaces are excluded for not being compliant with City standards then the plan, as presented, would not meet code requirements for parking relative to parking stall assignment (SBMC Section 28.90.100.G.3.e), but could

still meet the numerical requirement (SBMC Section 28.90.100). The ramp and some of the spaces represent a *potentially significant, but mitigable* (Class II) impact related to safety that can be resolved by eliminating or redesigning those impacted spaces as well as the driveway ramp.

The residential garage plan for the applicant's alternative has several operational issues and if spaces are excluded for not being compliant with City standards then the plan, as presented, would not meet code requirements for parking relative to parking stall assignment (SBMC Section 28.90.100.G.3.e), but could still meet the total numerical requirements (SBMC Section 28.90.100) for number of spaces. The operationally deficient spaces represent a *less than significant* (Class III) impact, which could be addressed by redesigning and/or reassigning the project's parking facilities. Generally, the applicant's alternative provides a better parking layout and circulation pattern than the proposed project. Impacts related to parking supply access and circulation would be *less than significant* (Class III) for the applicant's alternative.

Construction Impacts

The proposed project and the applicant's alternative would result in *less than significant* (Class III) construction impacts; however, a construction management plan should be prepared and close coordination with City staff and other area construction projects will be required to prevent impacts to nearby roadways and intersections.

Summary of Visual Aesthetic Impacts

The proposed project and applicant's alternative both would result in a change to the aesthetics of the site. Either project would partially obstruct views of the mountains; however, the removal of existing landscape trees would open up currently obstructed views. The proposed project (hotel portion) would partially obstruct views of the Santa Ynez Mountains from key locations (most importantly the Hitchcock Way and State Street intersection). However, due to the creation of a view corridor and the removal of vegetation that currently blocks views, this change is considered adverse but not significant in terms of environmental thresholds. The proposed project's residential development would not significantly block mountain views. The applicant's alternative (both the office and residential components) would change views of the mountains; however, due to the creation of a view corridor and the removal of vegetation that currently blocks views, this change is not considered significant in terms of environmental thresholds. Impacts are considered adverse, but *less than significant* (Class III) for both the proposed project and the applicant's alternative with regards to the loss of scenic views.

The loss of all on-site trees and lack of ~~significant~~ replacement vegetation is considered a *potentially significant, mitigable* (Class II) impact for both the proposed project and the applicant's alternative.

Identified mitigation measures would ensure that skyline trees are relocated on site and adequate replacement trees are included in the landscape plan.

Both the proposed project and applicant's alternative are generally consistent with Architectural Board of Review's guidelines. The proposed project (hotel portion) would partially obstruct views of the Santa Ynez Mountains from the Hitchcock Way and State Street intersection, thereby making it potentially inconsistent with some ~~policies of direction in the USSS, primarily Improvement Measure C.3.b.4.~~

Potentially Significant Impacts that Cannot be Avoided

Neither the proposed project nor the applicant's alternative would result in any significant and unavoidable (Class I) impacts.

1.7 Mitigation Measures

For each potentially significant impact, at least one mitigation measure has been proposed to reduce the significance of the environmental impact. **Table 12.0-1, Sandman Inn Redevelopment Project Mitigation Monitoring and Reporting Program Matrix**, lists the proposed mitigation measures. These mitigation measures would reduce the extent of the impact to below a level of significance for all impacts:

1.8 Alternatives

An EIR must briefly describe the rationale for selection and rejection of alternatives. The alternatives considered include a range of potential projects to meet the applicant's objectives while eliminating or reducing significant environmental impacts identified.

Alternatives considered include the following:

- No Project/No Development,
- Alternative Site Design – Reconfigure Hotel for the proposed project,
- Retain Front Setback Trees Alternative – Retain existing major trees located within the front setback for the applicant's alternative, and
- Single Driveway Alternative – Single driveway access for either the proposed project or applicant's alternative from State Street.

Table 1.0-1, Comparison of All Alternatives, provides a comparative analysis of the environmental impacts of the project and alternatives identified in **Section 9.0, Alternatives**. These alternatives were identified to avoid or minimize the significant or adverse impacts identified for the project.

Per the *State CEQA Guidelines*, the purpose of evaluating alternatives to the project is to determine whether any different project designs or locations could feasibly attain most of the basic project objectives while eliminating or reducing adverse environmental impacts.¹

Neither the proposed project nor the applicant's alternative have any significant impacts that cannot be mitigated. The alternatives presented herein either reduce already less than significant adverse impacts, or present options to make the project more consistent with the City policies outlined in the general plan and USSS.

The Alternative Site Design, Retain Front Setback Trees, and Single Driveway Alternatives address three different less than significant environmental and policy concerns related to scenic mountain views, loss of on-site trees, and circulation. All three of these designs would be more consistent with City policy than the proposed project (hotel and residential complex).

Both the Alternative Site Design Alternative (hotel and residential complex) and applicant's alternative (office and residential complex) would block scenic views of the mountains as seen from intersection of Hitchcock and State Street less than the proposed project (hotel and residential complex). The Alternative Site Design for the hotel and applicant's alternative would have very similar impacts with relation to blockage of scenic views.

Both the Retain Front Setback Trees and Single Driveway Alternatives, if added into the applicant's alternative, would make that alternative more consistent with City policy and result in a reduction of less than significant environmental impacts. It should be noted, however, that while the Retain Front Setback Trees Alternative would further reduce less than significant impacts related to the loss of trees, retaining skyline trees on site would reduce the project's ability to open up scenic views of the mountains. Therefore, decision-makers would need to weigh the merits of this alternative as it relates to both view policies and tree preservation policies

None of the alternatives or projects presented would result in any significant environmental impacts.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126.6.

**Table 1.0-1
Comparison of Alternatives**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	Applicant's Alternative Impact (After Mitigation)	Alternative 1: No Project		Alternative 2: Alternative Site Design		Alternative 3: Retain Major Trees		Alternative 4: Alternative Access	
			Compared to Proposed Project	Compared to Applicant's Alternative	Compared to Proposed Project	Compared to Applicant's Alternative	Compared to Proposed Project	Compared to Applicant's Alternative	Compared to Proposed Project	Compared to Applicant's Alternative
			Air Quality	Less than significant	Less than significant	Less Impact	Less Impact	Similar Impact	Similar Impact	Similar Impact
Transportation/Circulation	Less than significant	Less than significant	Less Impact	Less Impact	Similar Impact	Similar Impact	Similar Impact	Similar Impact	Similar Impact	Similar Impact
Visual Aesthetics	Less than Significant	Less than significant	Less Impact	Less Impact	Less Impact	Similar Impact	Less Impact	Less Impact	Similar Impact	Similar Impact

2.0 INTRODUCTION

2.1 PURPOSE AND TYPE OF EIR

Under the California Environmental Quality Act (CEQA), public agencies are required to evaluate proposed development projects for their effect on the physical environment and identify any feasible measures that would avoid or lessen significant environmental effects. This is intended to provide disclosure of the environmental consequences of a project to the public and agency decision makers before action is taken to approve project permits.

All projects within the State of California are required to undergo environmental review to analyze the environmental impacts associated with implementation of the project in accordance with CEQA.¹ The preparation of an environmental impact report (EIR) provides information to assist a lead agency in making decisions on the project but does not control the lead agency's exercise of discretion. Specifically, as noted in the *State CEQA Guidelines*,²

- (a) *An EIR is an informational document which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency.*
- (b) *While the information in the EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the EIR by making findings under Section 15091 and if necessary by making a statement of overriding consideration under Section 15093.*
- (c) *The information in an EIR may constitute substantial evidence in the record to support the agency's action on the project if its decision is later challenged in court.*

As provided for in CEQA, the EIR for this effort is considered a project EIR.³ This type of EIR focuses primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.

The City of Santa Barbara, as the lead agency under CEQA for the Sandman Inn Redevelopment Project, has determined that approval of the proposed project has the potential to result in environmental impacts that require additional analysis in an EIR. As a project EIR, this document evaluates changes in the

¹ California Public Resources Code, Section 21000 et seq., California Environmental Quality Act.

² Ibid, Title 14, Division 6, Chapter 3, *State CEQA Guidelines*, Section 15121.

³ Ibid, Section 15161.

environment resulting from both the construction and operational phases of the proposed development plan per the *State CEQA Guidelines*.⁴

The environmental review process for the Sandman Inn Redevelopment Project provides a co-equal level of analysis for the proposed project and the applicant's alternative. The proposed project includes a hotel and residential condominium complex while the applicant's alternative replaces the proposed hotel with two office buildings. The co-equal level of analysis provides the same level of detail and analysis for both the proposed project and the applicant's alternative for each of the issues that were determined in the Initial Study to have the potential for significant impacts. By completing the environmental review on both, this EIR provides flexibility to the City in approving either proposal without necessitating additional environmental review.

2.2 PUBLIC REVIEW PROCESS

The City prepared an Initial Study in accordance with the *State CEQA Guidelines*⁵ and the City of Santa Barbara's *Environmental Impact Evaluation Guidelines*. The Initial Study was distributed with the Notice of Preparation (NOP) for the EIR to public agencies that would potentially have comments on the content and analysis in the EIR. The NOP and Initial Study are provided in **Appendix 2.0**.

From May 27, 2008, through June 26, 2008, the City of Santa Barbara circulated the NOP and Initial Study for review and comment by the public, responsible agencies, and reviewing agencies. Additionally, on June 12, 2008, a Planning Commission scoping hearing was held at City Hall. The purpose of public and agency review of the NOP and Initial Study and the scoping hearing was to identify the proposed project's potential environmental effects to assist the City in

1. focusing the EIR on the effects determined to be potentially significant;
2. identifying the effects determined not to be significant;
3. explaining the reasons for determining that potentially significant effects would not be significant; and
4. identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

Twenty-one written comments from 19 agencies, organizations, and individuals were received in response to the NOP. They are summarized in **Table 2.0-1, Summary of NOP Comments**. Written comments received to the NOP are provided in **Appendix 2.0**. In addition, three individuals and the Planning Commission provided comments during the June 12, 2008, scoping meeting; these are also

⁴ California Public Resources Code, Title 14, Division 6, Chapter 3, *State CEQA Guidelines*, Section 15161

⁵ *Ibid*, Title 14, Division 6, Chapter 3, *State CEQA Guidelines*, Section 15082.

summarized in **Table 2.0-1**, and minutes from the Planning Commission hearing are provided in **Appendix 2.0**.

As a result of the comments received during both the 30-day NOP–Initial Study review and the scoping hearing, it ~~has been~~was determined that the proposed EIR’s scope of analysis would include evaluation of project environmental effects associated with traffic/circulation, air quality, and visual/aesthetic impacts.

~~This~~ draft EIR ~~is~~was released for public review on April 22, 2009, according to procedures in Section 15105(a) of the *State CEQA Guidelines*. Individuals from agencies and the public ~~have~~were given the opportunity to provide written comments on the draft EIR for a period of ~~45-30~~ days. A total of 16 written comment letters were received during the 30-day review period. A public hearing was held by the City Planning Commission on May 14, 2009, to gather additional comments from the public and from City decision makers. Upon conclusion of the public review period, written responses ~~will be~~were prepared to address substantive comments on environmental issues in the draft EIR. These responses, in addition to any revisions to the text of the draft EIR, ~~will be~~have been incorporated into ~~the proposed~~this final EIR.

~~Public~~A public hearings will be held by the City Planning Commission ~~to take comments on the draft EIR and~~ to consider certification of the final EIR and approval of the proposed development ~~plan for~~of the project.

2.3 CONTENTS OF THE EIR

The EIR contains the following sections and content:

1.0, Executive Summary: An overview of the project description, site characteristics, project history and background, project objectives, alternatives to the project considered, and summary of environmental impacts and mitigation measures.

2.0, Introduction: Purpose and type of EIR, public review process, contents of the EIR, effects found not to be significant and not analyzed further in the EIR, and required agency approvals.

3.0, Project Description: Project history; project location; project objectives; and project description, including the construction and operation of the proposed project and the applicant’s alternative, and discretionary actions.

4.0, Cumulative Scenario: Provides the basis for analysis of cumulative impacts including a listing of related projects that were considered.

**Table 2.0-1
Summary of NOP Comments**

Commenter	Date	Comment Summary
Robert and Jean Holmes	No Date	Concerns regarding visual impacts of multi-story buildings and blocking of views of mountains, inconsistency with surrounding commercial neighborhood, and project and cumulative traffic impacts.
Herbert Simpkins	February 8, 2008	Concerns with potential visual impacts of new buildings.
S.J. Wasen for the Wasen Family Trust	May 27, 2008	Supports upgrading of the area.
California Native American Heritage commission	May 29, 2008	Commented that the Commission performed a record search of its Sacred Lands File and found nothing on the project site. Commented that SB 18 and its provisions should be included for accidentally discovered archaeological resources during construction per CEQA.
Citizens Planning Association of Santa Barbara County	June 8, 2008	Expressed concerns regarding transportation impacts including estimates of average daily trips; air quality impacts including potential health hazards of traffic-generated air pollution on prospective residents and sensitive receptors, and short- and long-term impacts of demolition, construction, and future operation; and visual/aesthetic impacts including loss of openness and landscaping, and blocking of views of the mountains. Concerns were expressed with the request for entitlements including estimates and calculations of densities.
Dr. Phillip and Doris Hammond	June 9, 2008	Expressed concerns regarding traffic and visual impacts related to views of the mountains.
Patricia Hiles (letter 1)	June 9, 2008	Concerned with density of proposed residential units and use of the site for a commercial building.
Patricia Hiles (letter 2)	June 9, 2008	Expressed concern related to traffic and circulation including ingress and egress and adequacy of previous studies.
Rhonda Adawi	June 9, 2008	Concerned with potential loss of views, increased traffic congestion, lack of street parking, line-of-site views for street turning, traffic speeds, and level of service for traffic, and pedestrian and traffic safety.
Academy Printing	June 10, 2008	Expressed concerns related to potential demolition of existing structures and future density of the project site, loss of vegetation and trees, increased air pollution and traffic, earthquake faults and potential seismic hazards, and loss of potential cultural features.
Jim and Ginger Peterson	June 10, 2008	Concerned with visual impacts of building heights and loss of views of mountains. Also concerned with increased traffic and congestion.
J. T. Gerig	June 11, 2008	Expressed concerns with cumulative development of the proposed project and the Whole Foods Project including traffic and on-street parking.

Commenter	Date	Comment Summary
League of Women Voters of Santa Barbara	June 12, 2008	Concerns related to density of the project and compatibility with existing zoning, potential traffic impacts, loss of views due to the height of the buildings, loss of mature trees, and potential air quality impacts.
Linda Antone for San Remo Plaza Condominiums	June 14, 2008	Concerned with potential size of the project including density and three-story condominiums, loss of existing trees, lack of access drive from Town & Country Apartments to San Remo Drive, and overcrowded street parking. Also expressed concerns with large area of excavation, construction noise, and potential toxic air emissions during construction.
Joyce L. Trevillian	June 23, 2008	Expressed concerns with potential impacts of project on adjacent properties, specifically, parking, traffic on San Remo Street, existing driveway lines-of-site and safety, use of residential street by delivery trucks and associated noise, air quality and traffic impacts, use of proposed driveway as a shortcut for street traffic, height of proposed building and loss of views from apartments, increased noise, and shade and shadow impacts.
Professional Investment Planning for GWEN Griffin Property	June 23, 2008	Expressed concern with use of adjacent lots (3760 and 3868 State Street adjoining the project site) for parking and access for the project site.
Citizens Planning Association of Santa Barbara County	June 24, 2008	<p>Expressed additional concerns (see prior comments in letter dated June 8, 2008) related to traffic and estimated average daily trips, PM level of service at the intersection of Hitchcock Avenue and State Street, air quality impacts associated with potential health hazards of project-related traffic, loss of open space and mature trees, applicability, implementation and enforcement of mitigation measures to reduce construction-related air quality impacts, visual impacts associated with the project's size and density and loss of trees, and loss of existing views along State Street of the Santa Ynez Mountains.</p> <p>Additionally, expressed concerns with findings of the initial study that determined less than significant impacts would result on drinking water, public safety (police and fire protection), and recreation.</p> <p>Questioned proposed noise mitigation for the proposed residential units, transport of solid waste from the site especially during demolition and construction, and surface water runoff during construction and demolition into nearby water courses (San Roque and Arroyo Burro).</p> <p>Concerns were expressed regarding cumulative impacts and potential precedent-setting actions of converting the project site as proposed that would result in increased density of the area. Also expressed concerns regarding the combined impacts to the area with the Whole Foods project including traffic, trip generation rates, level of service, and bicycle safety.</p>
James Read	June 25, 2008	Expressed concerns with potential traffic impacts including congestion at the Hitchcock Avenue and State Street intersection, increased traffic volumes and decrease in levels of service, and loss of existing views of mountains from State Street.
California Department of Transportation	June 26, 2008	Requested that the traffic study evaluate the impact of project related trips at the US Highway 101 and Hope Avenue intersection.

Commenter	Date	Comment Summary
Investec Real Estate Companies	June 26, 2008	Provided comments, as the applicant and owner, related to the project description, existing uses on the site, use of "smart growth and green technologies," proposed building setbacks, information related to existing and proposed parking, information on scenic views, public views available through the project site, proposed landscaping, compliance with the policies in the general plan and Upper State Street Study, comments and information provided by the Architectural Board of Review and Planning Commission, vehicle access and circulation, policies related to housing, commercial improvements, pedestrian connectivity, transfer of development rights, proposals to extend Hitchcock Avenue for access, and cumulative project mitigation.
Joe Rution for Allied Neighborhoods Association	June 26, 2008	Commented that the Allied Neighborhoods Association endorsed the comments of the Citizen's Planning Association (see letter dated June 24, 2008) and that the visual impact of the dense cluster of large buildings is out of scale with Upper State Street.
Paul Hernadi representing Citizen's Planning Association	June 12, 2008 (scoping meeting)	Expressed concerns regarding visual aesthetics and incompatibility with the existing neighborhood and loss of urban forest, air quality, and lack of compliance with standards, and transportation.
Patricia Hiles representing Citizen's Planning Association	June 12, 2008 (scoping meeting)	Expressed concern that the traffic study was not accurate. Concerns also included size of the proposed development, density, and cumulative impacts.
Connie Hannah representing the League of Women Voters	June 12, 2008 (scoping meeting)	Expressed concerns regarding the amount of commercial uses and number of residential units, traffic impacts, three-story buildings close to State Street, air quality impacts, and preservation of trees.

Commenter	Date	Comment Summary
Planning Commission	June 12, 2008 (scoping meeting)	<p>The Planning Commission provided the following comments:</p> <ol style="list-style-type: none"> 1. The buffer referred to in the general plan designation for this site runs east-west behind the area that is generally commercially zoned and buffers the residential uses to the north from the more commercial use areas along State Street. The commission inquired as to the intention of the buffer as provided in the general plan and for a thorough discussion of the buffer designation in the EIR. 2. East-west circulation through the site should not be precluded by the north/south orientation of the site. 3. Recreational opportunities need to be identified and addressed. 4. A consistency analysis with the general plan Land Use Element Plan and policies should be provided as part of the EIR. 5. Clarified that the parking structures for the hotel and residential condominiums are two different separate underground structures. Requested that the parking analysis evaluate employee hotel parking and potential for spillover into City streets. 6. Expressed concern for hotel or office taking access from the signalized intersection at State Street and Hitchcock Way. 7. Indicated that a view analysis should include views of the project architecture and site design. 8. Expressed desire to see an alternative that did not consider transfer of existing development rights. 9. Requested additional information regarding the lot line adjustment that would provide an additional 3,000 square feet to the hotel. 10. Requested a discussion on the setback area and whether it includes planting areas in the ground that would allow for large trees. 11. Requested a discussion as to possible mitigations for recreation as it is outside the standard walking range for a neighborhood park. 12. Inquired as to whether or not a lot merger would result in the project being considered mixed use. If so, could the parking component for the residential portion be reduced to one space per unit rather than two and result in a smaller underground parking structure. 13. Indicated a preference for the aesthetics of the office structure in the applicant's alternative to the three-story hotel in the proposed project. 14. Noted that the intent of the general plan needs to be reflected in off-site improvement, off-site linkages and payment into an open space district. 15. Indicated that the EIR should use current traffic figures in its analysis.

5.0, Land Use and Policy Consistency: Discussion of the consistency of the proposed project and the applicant's alternative with existing land use conditions, zoning, and general plan and Upper State Street Study (USSS) policies.

6.0–8.0, Environmental Analysis: Sections 6.0 through 8.0 constitute the environmental review of the project for each of the topics described below. The analysis in each chapter includes the following information:

- *Impact Significance Guidelines:* Identification of impact significance guidelines for assessing the severity of identified environmental impacts.
- *Methodology:* Description of methodology used to assess environmental impacts.
- *Regulatory Framework:* Discussion of applicable policies, plans, and standards identified for each environmental topic.
- *Existing Setting:* Identification of the existing physical conditions on the project site and in its vicinity.
- *Project Features:* Identification of any project features that would minimize or avoid potential impacts.
- *Long-term Impacts:* Evaluation of the long-term environmental impacts and effects of the current project proposal, the applicant's alternative, and cumulative pending projects in the area, including an enumeration of mitigation measures to avoid or reduce identified impacts.
- *Temporary Construction Impacts:* Evaluation of the temporary construction-related environmental impacts and effects of the current project proposal, the applicant's alternative, and cumulative pending projects in the area, including an enumeration of mitigation measures to avoid or reduce identified impacts.
- *Summary of Impacts:* Conclusions regarding the significance of identified environmental impacts, including any significant unavoidable adverse impacts.

6.0, Air Quality: Emissions of air pollutants by dust, demolition, construction equipment, and diesel toxic emissions, including a discussion of potential impacts of greenhouse gases.

7.0, ~~Transportation~~ and Circulation: Construction traffic, project trip generation and circulation, and parking.

8.0, Visual Aesthetics: Public views and on-site visual aesthetics and compatibility.

9.0, ~~Alternatives to the Proposed Project~~: This section provides comparative environmental evaluation of alternative projects for their potential to avoid or minimize environmental impacts while substantially meeting the project's objectives.

10.0, Long-Term Implications of the Project: This section discusses significant unavoidable environmental effects, significant irreversible environmental changes, growth-inducing impacts, and energy conservation.

11.0, Effects Found Not to be Significant: This section identifies those effects of the project that were determined not to be significant and lists, as necessary, routine mitigation measures or conditions of approval.

12.0, Comments and Responses to Comments: This section provides public comments in response to the Draft EIR and the City's responses.

13.0, Corrections and Additions to the Draft EIR: This section lists the page numbers that contain changes from the Draft EIR.

14.0, Mitigation Monitoring Program: A chart itemizing each identified mitigation measure to reduce environmental impacts, which indicates the responsible party and timing of the mitigation requirement.

15.0, Organizations and Persons Consulted: A listing of all persons and organizations contacted as part of preparation of the EIR.

16.0, References: A listing of all documents utilized in preparation of the EIR.

17.0, List of Preparers: A listing of all contributors to and reviewers of the EIR.

Appendices to the EIR:

2.0 Notice of Preparation/Initial Study/Responses to NOP

5.0 Supplemental Policy Consistency Analysis

6.0 Air Quality Technical Analysis

Construction Emissions Analysis

GHG Emissions Analysis

Health Risk Assessment

State Regulatory Setting for Global Climate Change and Greenhouse Gas Emissions

7.0 Traffic and Circulation Technical Analysis

8.0 Consistency with Architectural Board of Review Guidelines Table

2.4 REQUIRED AGENCY APPROVALS

The City of Santa Barbara, as the designated lead agency, has the authority for preparation and certification of this EIR and approval of discretionary permits. These discretionary approvals are described in **Section 3.6, Discretionary Actions**, of this EIR.

2.5 STANDARDS OF ADEQUACY OF THE EIR

State CEQA Guidelines state that an EIR analysis need not be exhaustive, but that it provide information that enables decision makers to take into account a project's environmental consequences and make an informed decision.⁶ The guidelines note that disagreement among experts does not invalidate an EIR analysis; however, a summary of any disagreement among experts should be provided. As stated in the *State CEQA Guidelines*: "... the courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."⁷

⁶ California Public Resources Code, Title 14, Division 6, Chapter 3, *State CEQA Guidelines*, Section 15151.

⁷ *Ibid.*

3.0 PROJECT DESCRIPTION

3.1 INTRODUCTION

This section of the environmental impact report (EIR) provides a description of the project and the discretionary actions necessary to carry out construction of the project. The analysis of project impacts provided in EIR Sections 6.0 through 8.0 is based on the description of the project provided in this section.

The project applicant, L & P Consultants, and owner, Kellog Associates, L.P., (hereafter collectively referred to as “the applicant”), has submitted an application requesting City of Santa Barbara (City) approval of the proposed Sandman Inn Redevelopment Project, including the following components:

- Demolition of the existing 113-room Sandman Inn hotel, adjacent restaurant and all site improvements.
- Construction of either
 - **Proposed Project:** construction of a 106-room hotel and 73 residential condominium units. This would include a total of 291 parking spaces with 1 at-grade and ~~100~~110 underground parking spaces for the hotel component, 163 underground parking spaces for the residential component, and 17 at-grade common/shared spaces; or
 - **Applicant’s Alternative:** construction of approximately 14,254 square feet of office space contained in two buildings and 73 residential condominium units. This would include a total of 237 parking spaces with 66 parking spaces (61 spaces at-grade and 5 spaces underground) for the office component, 162 underground parking spaces for the residential component, and 9 at-grade common/shared spaces.
- Construction of a new driveway access from the Town & Country Apartments to San Remo Avenue, necessitating demolition of an existing residential unit.

3.2 PROJECT BACKGROUND

This section provides background information regarding the project site and prior development requests.

3.2.1 Project History

The application for the proposed project was initially submitted to the City for consideration in April 2003 (prior application number MST2003-00286). Since then, the City has worked with the applicant to address issues and concerns related to the application and redevelopment of the site. A revised application (number MST2007-00591) was submitted in November 2007 and is now under consideration.

As part of the application and environmental review process, the project has been reviewed by the following:

- Architectural Review Board (ARB) – October 27, 2003, November 3, 2003, February 11, 2008, and February 23, 2009
- Planning Commission – July 13, 2003 (concept hearing), February 8, 2007 (scoping hearing), and July 12, 2008 (scoping hearing)

Public comments were accepted at each of the aforementioned meetings.

Plans for the applicant's alternative were provided to the City in March 2008 after the proposed project was deemed complete for environmental review. The intention of this submission was for the applicant's alternative to be considered in the EIR at a project level. The plans for the applicant's alternative have been reviewed by the Architectural Review Board.

3.2.2 Existing Setting

The project site is located in an urban environment in the North State and San Roque neighborhoods of the City of Santa Barbara.

Existing development in the project vicinity includes a mix of buildings containing retail, commercial, office, and residential uses. Existing structures on the main project site include a 5,050-square-foot restaurant, with capacity for 216 patrons, and the Sandman Inn hotel, with 113 rooms. The existing structures are relatively low-profile, 1960s-style buildings distributed throughout the property, interspersed with parking and open areas, and include ample mature landscaping. The hotel includes one- and two-story buildings and associated improvements including swimming pools. The restaurant operates as an independent business from the hotel.

The “main” project site (APNs 053-300-023 and -031) includes approximately 205 mature trees and ornamental plants. Vegetation on the main project site is characterized primarily by specimen non-native plant material, mainly subtropical plants such as palms, bird of paradise, yucca, and tupidanthus, as well as jacaranda, coral, and one cedar tree.

The main project site also provides for access to the Town & Country Apartments (3730 State Street), located to the north of the main project site, from State Street through the Sandman Inn parking area. To the rear of the Town & Country Apartments is a duplex (3715 San Remo Drive). The duplex would be converted into a single-family residence to accommodate new access to the Town & Country Apartments from San Remo Drive. Therefore, these two parcels (Town & Country Apartments and duplex) are part of

the project and are included in the overall project site description, but are not part of the “main” project site.

The project site is located on the north side of State Street in an area identified as the Upper State Street corridor. As identified in the Upper State Street Study (USSS) Information Booklet, the site is located within the west subarea of the Upper State Street area.

3.3 PROJECT OBJECTIVES

Pursuant to Section 15124 of the *California Environmental Quality Act (CEQA) Guidelines*, the description of the proposed project shall contain a statement of its objectives. The objectives for the Sandman Inn Redevelopment Project are as follows:

- Provide an in-fill redevelopment project that is consistent with the City’s existing General Plan vision, specifically as it applies to the North State neighborhood, and taking into consideration direction given in the *City’s General Plan Update: Policy Preferences Report* (December 2008);
- Provide increased housing opportunities, including affordable housing, which are located on the City’s major transportation corridor and which are in close proximity to retail and service facilities;
- Incorporate the direction provided in the USSS as appropriate including project/site design, access and parking;
- Redevelop an existing underutilized commercial property with improvements which will maintain or enhance views of the mountains;
- Redevelop an existing underutilized commercial property to a mixed use project consisting of commercial and residential units; and
- Eliminate access conflicts between the Town & Country Apartments and the project parcels fronting State Street.

3.4 PROJECT LOCATION AND SURROUNDING USES

3.4.1 Project Location

The project site is located in the City of Santa Barbara in southern Santa Barbara County. Regional access to the project site is provided by US Highway 101 (US 101), as shown in **Figure 3.0-1, Project Location**. The main project site is located on State Street several blocks north of US 101 between North Hope Avenue and North Ontare Road, as shown in **Figure 3.0-2, Local Vicinity Map**. Local access to the main project site is currently provided from State Street.

The main project site is 4.58 acres and is composed of two adjacent parcels (APNs 053-300-023 [1.36 acres] and 053-300-031 [3.22 acres]; 3714, 3740, and 3744 State Street) that are proposed for redevelopment with

either a hotel or office buildings, and residential condominiums. The project also involves two additional parcels (APNs 053-300-032 [1.0 acre] Town & Country Apartments at 3730 State Street and 053-222-010 [0.20 acres] an existing duplex at 3715 San Remo Street). As previously noted, the duplex would be converted into a single-family dwelling unit by demolishing a portion of the building to provide access to the Town & Country Apartments from San Remo Drive. **Figure 3.0-3, Existing Parcel Map**, shows the location of each parcel.

The main project site (hotel or office buildings and condominium) is located in the North State neighborhood immediately northeast of the State Street–Hitchcock Way intersection (see **Figure 3.0-4, Neighborhood Map**). The Town & Country Apartments (3730 State Street) and existing duplex (3715 San Remo Drive) parcels are in the San Roque neighborhood of the City of Santa Barbara.

The characteristics of the property are listed in **Table 3.0-1, Summary of Property Characteristics**.

**Table 3.0-1
Summary of Property Characteristics**

	Assessor's Parcel Number (APN)	Size (acres)	Zoning	Address	Existing Land Use
Main Project Site					
Parcel Information	053-300-023	1.36	C-P/S-D-2	3714 State Street	Hotel
	053-300-031	3.22	C-P/R-4/S-D-2	3740 and 3744 State Street	Hotel and Restaurant
Other Involved Parcels					
	053-300-032	1.00	R-4/S-D-2	3730 State Street	Apartments
	053-222-010	0.20	R-2/S-D-2	3715 San Remo Drive	Duplex
General Plan Designation	APNs 053-300-023 and 031: General Commerce/Offices; Residential - 12 units per acre; Buffer				
	APNs 053-300-032 and 053-222-010: Residential – 12 units per acre				
Slope	Approximately 2 percent				

3.4.2 Surrounding Land Uses

The Upper State Street area of the City is primarily in residential use (44 percent) under the *City of Santa Barbara General Plan*.¹ Zoning in the Upper State Street area provides for low-density residential use with commercial, office, and hotel uses indicated for much of the State Street frontage and La Cumbre–State Street area.

¹ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

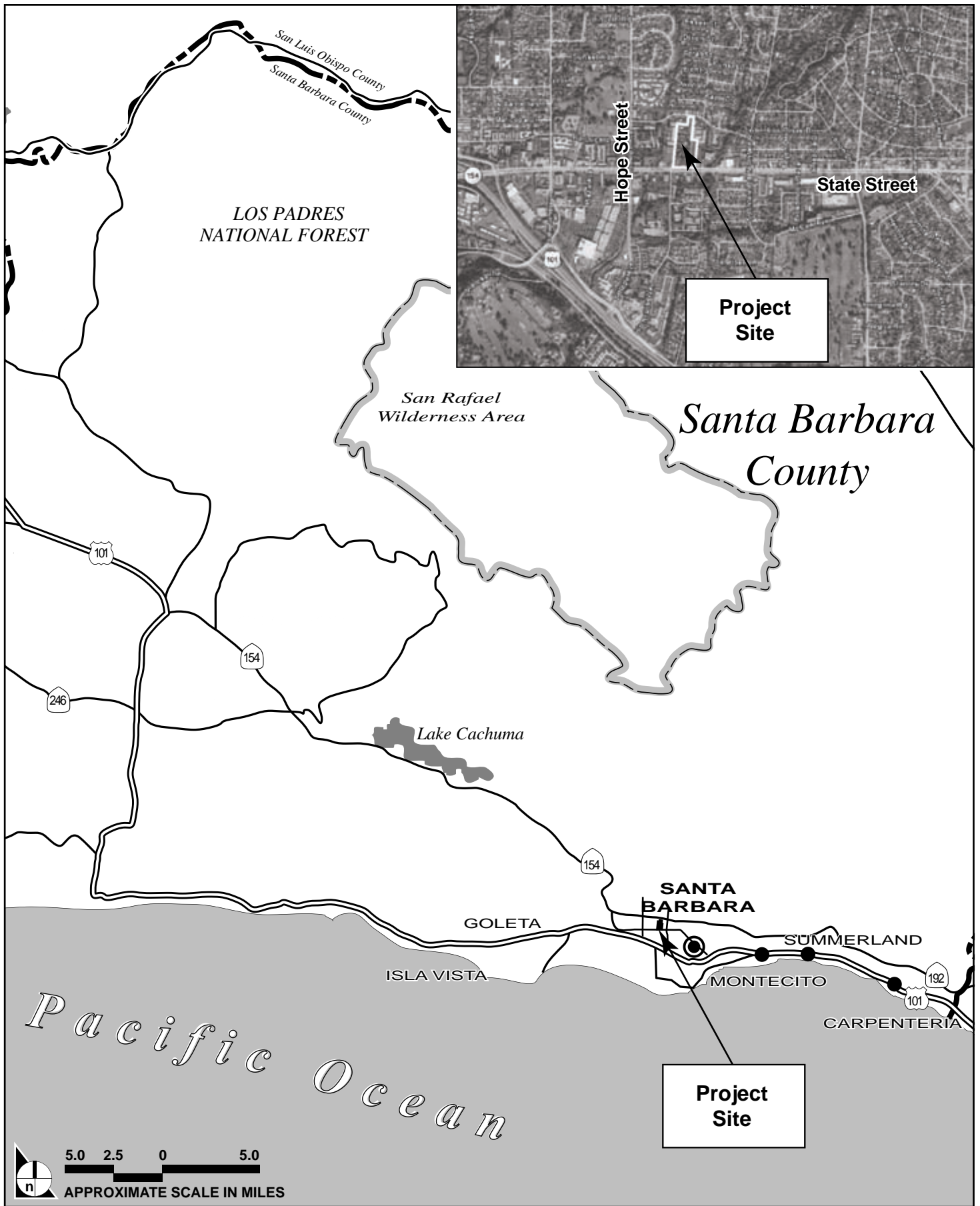
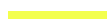



FIGURE 3.0-1

Project Location



Legend:
 Project Site


SOURCE: Google Earth - 2008

FIGURE 3.0-2

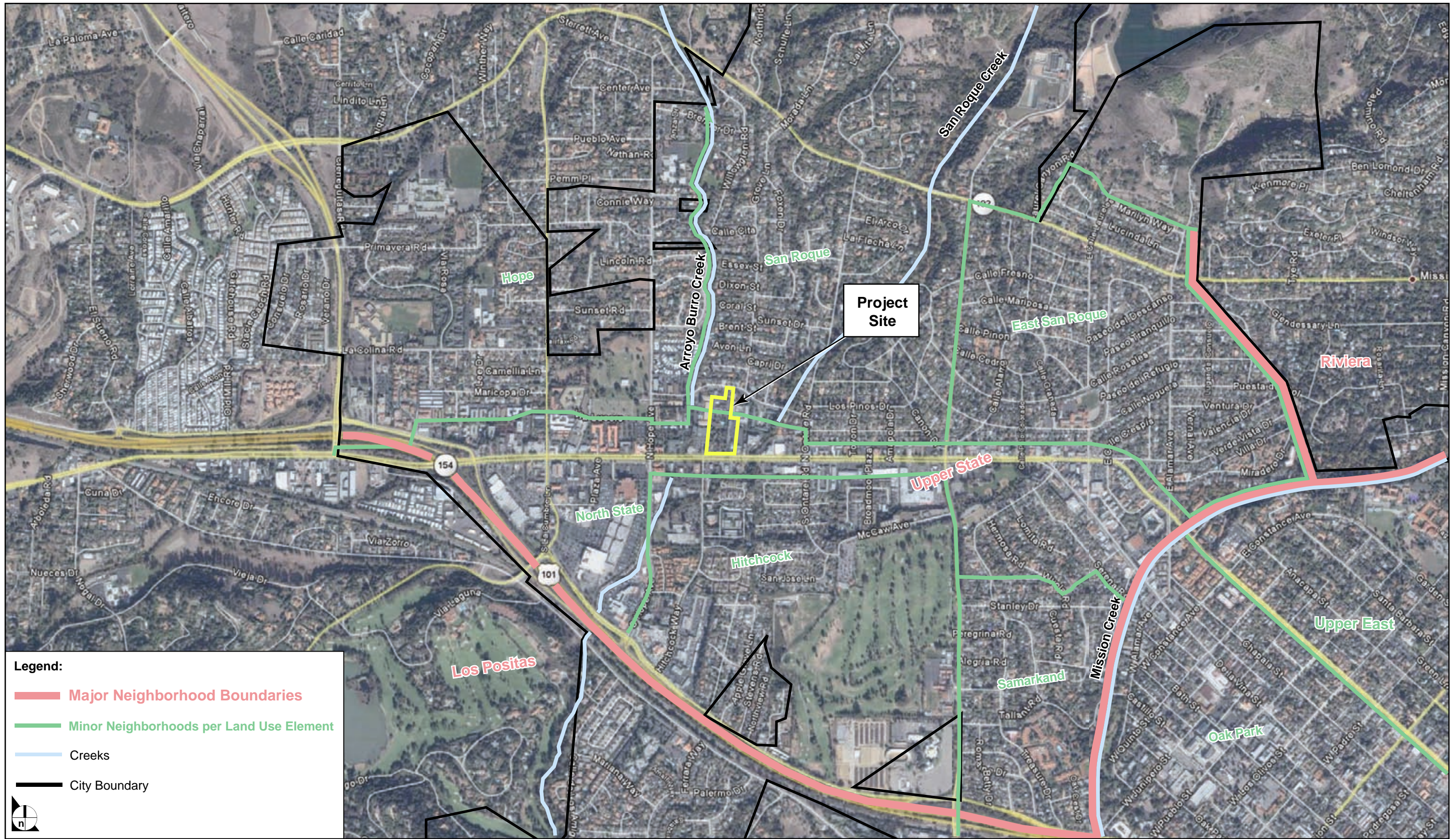
Local Vicinity Map



FIGURE 3.0-3

Existing Parcel Map





SOURCE: City of Santa Barbara, Master Environmental Assessment, 1981; General Plan Land Use Element, 1995.

FIGURE 3.0-4

Neighborhood Map

As shown on **Figure 3.0-5, Aerial of Project Area**, a variety of uses lie adjacent to the main project site, including:

North: apartment buildings, duplexes and condominiums;

South: State Street and commercial uses (restaurants, car wash, bank, retail, etc.);

East: commercial and office buildings; and

West: banks and office buildings.

The main project site and immediate areas to the east, west, and south are part of the North State neighborhood. This neighborhood is an intensively developed commercial strip containing a scattering of multiple-family residential development; mobile home parks are also located on the periphery.

Beyond the main project site to the north is the San Roque neighborhood, which is virtually fully developed with single-family homes. However, apartment complexes have been constructed to the south behind the outer State Street area. San Roque Creek runs through the neighborhood. The Via Lucero area, as part of the Hope neighborhood to the west, has a mixture of single-family residences and multiple-dwelling units, and limited commercial utilization. East of the San Roque neighborhood is the East San Roque neighborhood, which is primarily made up of single-family homes.

South of the North State neighborhood is the Hitchcock neighborhood. The Hitchcock neighborhood consists of several sub-areas including single-family areas, multi-family areas, commercial and office areas and vacant areas. The Hitchcock neighborhood contains the Community Golf Course, the YMCA, and Adams Elementary School. The Earl Warren Showgrounds are adjacent to the Hitchcock neighborhood on unincorporated land.

3.5 PROJECT DESCRIPTION

The project under consideration consists of demolition of the existing structures on the main project site, development of either a hotel and condominium or office and condominium project, and development of a new access via San Remo Drive for the Town & Country Apartments by converting a duplex into a single-family dwelling unit and installing a new driveway.

The characteristics of the proposed project and applicant's alternative are listed in **Table 3.0-2, Summary of Project Characteristics**.

**Table 3.0-2
Summary of Project Characteristics**

Project Component	Proposed Project	Applicant's Alternative
Demolition		
Parcel Size	4.58 acres	4.58 acres
Demolition Area	65,000 sq. ft. of building 135,000 sq. ft. of site clearing	65,000 sq. ft. of building 135,000 sq. ft. of site clearing
Demolition Waste	2,640 tons	2,640 tons
Construction		
Grading and Excavation	80,000 cu. yds. of export	60,000 cu. yds. of export
Excavation Depths	Up to 15 feet	Up to 15 feet
Hotel		
Parcel Size	1.34 acres	NA
Building Area	62,698 sq. ft.	NA
Landscaped Area	6,547 sq. ft.	NA
Height	3 stories not to exceed 45 feet	NA
Rooms	106 rooms	NA
Parking	111 spaces plus 17 shared	NA
Office		
Parcel Size	NA	1.06 acres
Building Area	NA	14,594 sq. ft.
Landscaped Area	NA	7,145 sq. ft.
Height	NA	2 stories not to exceed 31 feet
Number of Offices	NA	5
Parking	NA	66 spaces plus 9 shared
Residential Condominiums		
Parcel Size	3.24 acres	3.52 acres
Building Area	93,719 sq. ft.	93,797 sq. ft.
Landscaped Area	23,031 sq. ft.	30,817 sq. ft.
Height	2 to 3 stories not to exceed 31 feet	2 to 3 stories not to exceed 31 feet
Total Units	73 units	73 units
Affordable Units	11 units	11 units
Total Bedrooms	161 bedrooms	169 bedrooms
Parking	163 spaces plus 17 shared	162 spaces plus 9 shared



SOURCE: Blackbird Architects - January 2008

FIGURE 3.0-5

Aerial of Project Area

3.5.1 Demolition

The existing Sandman Inn, office, hotel rooms, parking areas, and adjacent restaurant, as well as all existing site improvements, would be demolished and removed. All landscaping and trees on the site would also be removed.

Demolition would include abatement of hazardous materials, building demolition, and site clearance. Abatement would occur in selected buildings as appropriate. Demolition would include the removal of approximately 65,000 square feet of existing building structures and 135,000 square feet of site clearing. The project is anticipated to generate 2,640 tons of demolition waste.

Waste would be hauled from the site via State Street and Hope Avenue to US 101 for disposal at approved landfills. Haul trucks would return to the site via US 101 at Las Positas Road and State Street. The proposed haul route map is shown in **Figure 3.0-6, Haul Route**.

It is anticipated that demolition would occur over a 14-week period (5 weeks for abatement and 9 weeks for building demolition and clearing).

3.5.2 Proposed Project (Hotel and Residential Condominiums)

Under the proposed project, the applicant would construct a 106-room hotel and 73 residential condominium units. The project proposes a total of 291 parking spaces (111 parking spaces for the hotel component, 163 parking spaces for the residential component, and 17 common/shared spaces). **Figure 3.0-7, Proposed Project Site Plan**, shows the hotel and condominium building footprints and site details. **Figures 3.0-8 and 3.0-9, Proposed Project Elevation Diagrams**, provide architectural renderings of the proposed hotel and residential condominiums. **Figure 3.0-10, Proposed Project Underground Structure Parking Plan**, shows the details of the proposed underground parking for the hotel and residential condominiums.

The hotel and residential condominium development would be on separate parcels. A lot line adjustment is required for the proposed project to reduce the ultimate area of hotel property use within an adjusted lot area of 1.34 acres. After the proposed adjustment, a revised parcel of 3.24 acres would be available for the proposed condominium project. **Table 3.0-3, Proposed Lot Line Adjustments**, shows the current lot sizes and the proposed changes to lot size under both the proposed project and the applicant's alternative.

**Table 3.0-3
Proposed Lot Line Adjustments**

Parcel	Existing Area	Adjusted Area	
		Proposed Project	Applicant's Alternative
APN 053-300-031	3.22 acres	1.34 acres	1.06 acres
APN 053-300-023	1.36 acres	3.24 acres	3.52 acres
TOTAL	4.58 acres	4.58 acres	4.58 acres

Hotel

The proposed hotel includes an underground garage structure; a one-story lobby, check-in, breakfast and meeting rooms component toward the south of the parcel; and three stories of hotel rooms designed on the north and west side of the parcel. The architecture is Mediterranean in style, addresses State Street at the lobby entrance to the south, and steps back, or “wedding cakes” from a one-story to a two-story and to a three-story structure at the southwest side of the property.

The proposed hotel would measure 44 feet 6 inches in height above existing grade and would contain three stories above a one-level underground parking garage. The hotel building would be 62,298 square feet, including 19,834 square feet of non-room area (i.e., meeting rooms, corridors, lobby, laundry area, etc.), above a 46,701-square-foot parking garage. The hotel would provide for 111 parking spaces (110 parking spaces within the underground parking structure, plus 1 at grade); 17 additional spaces (non-dedicated) to be shared with the proposed residential condominiums would be provided at grade (5 on the hotel parcel and 12 on the condominium parcel). (Note: four additional spaces exist on the western boundary of the hotel parcel that are accessed from the adjacent property to the west; these spaces are not included in the hotel parking summary as they do not lend themselves to convenient access to the hotel.)

The first floor of the hotel would be set back 20 feet from the edge of the State Street right-of-way (back of sidewalk). The second and third floors would step back from the first floor 10 and 30 feet, respectively. The hotel has been designed in a “U” configuration around a porte cochere/loading area and includes a pool and lounging areas within the interior courtyard. The first floor of the hotel would include the lobby, administration area, meeting rooms, a fitness room, a breakfast room, and restrooms, along with 29 hotel rooms and would total 25,027 net square feet. The second and third floors would include 40 and 37 hotel rooms, respectively, and would total 19,551 net square feet and 17,720 net square feet, respectively.



SOURCE: Blackbird Architects - January 2008

FIGURE 3.0-6

Haul Route



SOURCE: Blackbird Architects - January 2008

FIGURE 3.0-7

Proposed Project Site Plan



FIGURE 3.0-8

Proposed Project Elevation Diagrams



FIGURE 3.0-9

Proposed Project Elevation Diagrams

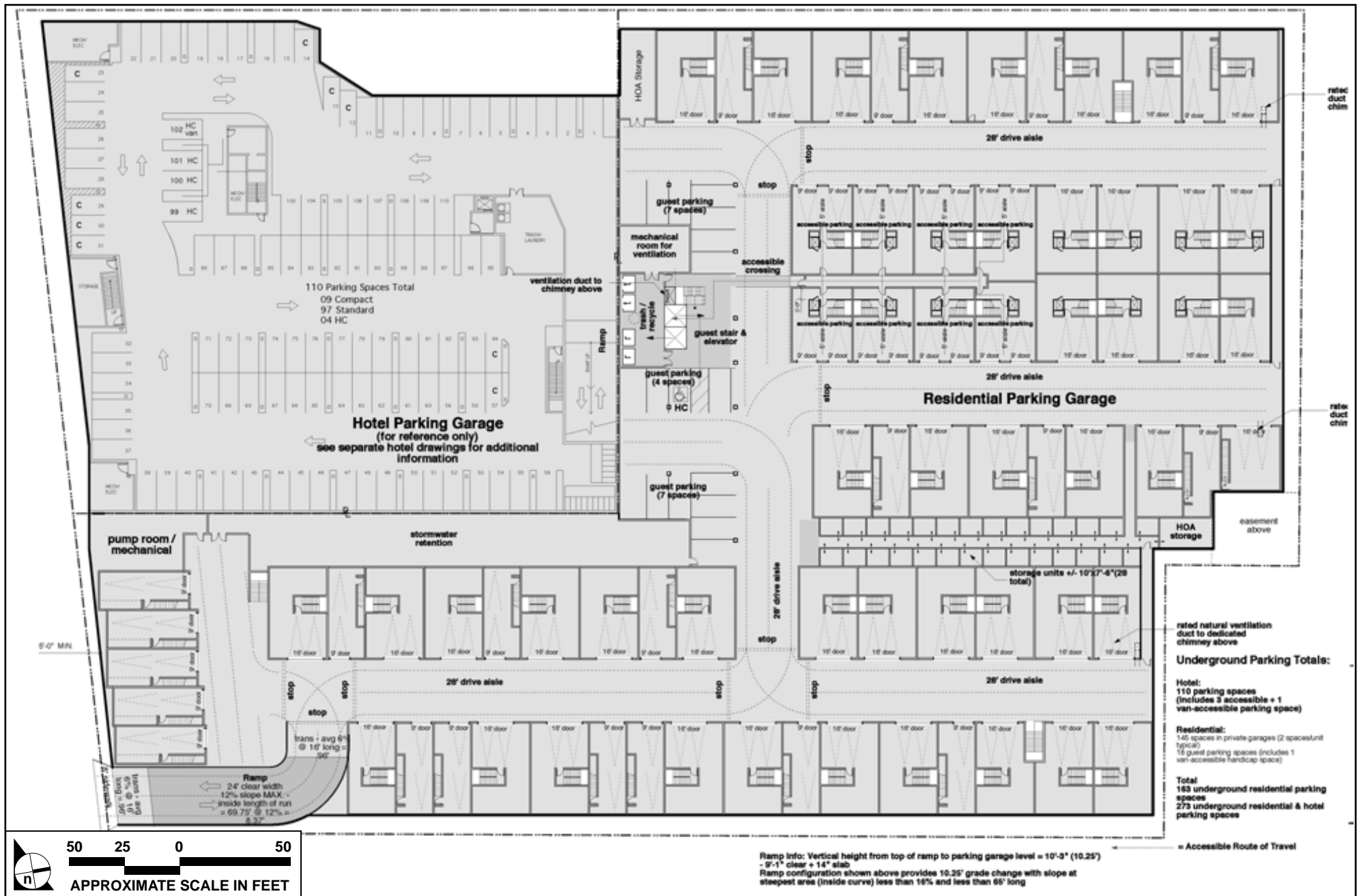


FIGURE 3.0-10
Proposed Project Underground Structure Parking Plan

A plaza and open space area (located on the residential condominium parcel) would separate the hotel from the condominiums along the hotel's north side.

Residential Condominiums

The proposed condominium design concept reflects an urban theme with particular focus on housing design, circulation, garden entrance courts, pedestrian courts, and transit orientation. The housing design envisions efficient compact residences and a cluster mix of 10 separate unit types. Private outdoor space directly connects to indoor living space. Entry porches and decks face the main site circulation routes and courts, giving life and providing social interaction space with neighbors and pedestrians.

The proposed residential condominiums would be two to three stories tall and constructed above a one-level underground parking garage containing 163 parking stalls (145 of these parking stalls would be in private garages associated with an individual residential unit, while 18 stalls would be open and available for guest parking). In addition, and as noted previously, 17 at-grade parking spaces (non-dedicated) would be provided and shared with the proposed hotel (5 on the hotel parcel and 12 on the condominium parcel).

The residential development would have a maximum height of 31 feet above finished grade. The units closest to State Street would have a first floor set back 20 feet from the edge of the right-of-way (back of sidewalk); the second floor would be set back 25 feet from the edge of the right-of-way (back of sidewalk). The closest three-story residential building element is located a minimum of 66 feet from the edge of the right-of-way. Ten unit types are proposed; these would be clustered in groups of two to five units. The mix of units includes one-bedroom, two-bedroom, and three-bedroom units, as follows: 22 one-bedroom units ranging from 829 to 1,178 square feet, 14 two-bedroom units ranging from 1,166 to 1,251 square feet, and 37 three-bedroom units ranging from 1,448 to 1,531 square feet. The applicant proposes to provide 11 of the 73 units (2 one-bedroom, 4 two-bedroom, and 5 three-bedroom units) at levels affordable to middle-income buyers, in accordance with the City of Santa Barbara's Inclusionary Housing Ordinance. These units would be subject to income and sales price restrictions pursuant to the City of Santa Barbara's Affordable Housing requirements.

Open Space/Plaza

As noted previously, a plaza and open space area (located on the residential condominium parcel) would separate the hotel from the condominiums along the hotel's north side. The "plaza" area would include a 76-foot-diameter turn circle with a 21-foot drive aisle located at the northern end of the hotel access driveway. The turn circle would provide an accessible drop-off area and access to the hotel's rear units

(via stairs and elevator). In addition, areas for commercial and residential loading and unloading and a trash/recycle pickup would be provided.

An open space area would be provided to the west of the turn circle and elevator/stairs. This area would provide a landscaped turf area suitable for active recreation for the residents of the condominiums. Two spaces for bicycle parking would be provided.

Landscaping

The proposed project would provide for landscaping throughout the main project site as illustrated in **Figure 3.0-11, Proposed Project Landscape Plan**, which includes the Conceptual Landscape Plan Plant Palette. As shown, landscaping along State Street would follow the City of Santa Barbara's *Upper State Street Guidelines*. The project would result in the removal of approximately 205 trees. If possible, some trees (mature palms) may be retained and relocated on site as part of the landscaping plan.

The landscaping plan provides for a 4-foot landscape strip planted with low shrubs between State Street and the sidewalk. Box street trees would be planted as required by the City arborist. Canopy trees and/or groupings of palm trees with an underplanting of shrubs would be featured in entry areas. Landscaping along the driveway would be designed to create a linear park-like space. Medium-size canopy trees would line the driveway. Medium-size trees (15 to 22 feet in height) would also be planted in raised planters set close to buildings. Large canopy trees would be planted on the periphery of the open space/plaza area to create spatial definition between the private driveway and play/open areas.

Access

Ingress to and egress from the proposed hotel would be provided via a driveway located off of State Street between the hotel and proposed residential condominiums. This driveway, flanked by parallel parking, buffers the hotel from the proposed condominiums to the east of the hotel. The driveway would provide access to the hotel porte cochere and underground parking garage, as well as the plaza/drop off area for the residential condominiums.

Ingress to and egress from the residential condominiums would be via a driveway at the eastern side of the main project site leading down to the residential parking garages. Secondary access to the residential units is also provided via the at-grade portion of the hotel driveway.



plant palette

plants such as

- | | |
|------------------------------------|------------------------|
| Trees | |
| <i>Arbutus unedo</i> | Strawberry Tree |
| <i>Brachychiton spp.</i> | Bottle Tree |
| <i>Cupressus sempervirens</i> | Italian Cypress |
| <i>Erythrina spp.</i> | Coral Tree |
| <i>Jacaranda mimosifolia</i> | Jacaranda |
| <i>Olea europea 'Fruitless'</i> | Fruitless Olive Tree |
| <i>Platanus racemosa</i> | California Sycamore |
| <i>Quercus agrifolia</i> | Coast Live Oak |
| <i>Strelitzia nicholi</i> | Giant Bird of Paradise |
| Screen Trees | |
| <i>Eucalyptus citriodora</i> | Lemon-scented Gum |
| <i>Eucalyptus sideroxylon</i> | Pink/red Ironbark |
| <i>Populus nigra 'Italica'</i> | Lombardy Poplar |
| <i>Sequoia sempervirens</i> | Coast Redwood |
| Fruit Trees | |
| <i>Citrus spp.</i> | Orange, Lemon or Lime |
| <i>Eriobotrya japonica</i> | Loquat |
| <i>Ficus spp.</i> | Edible Fig |
| <i>Fortunella margarita</i> | Kumquat |
| <i>Malus 'Garden Delicious'</i> | Dwarf Apple Tree |
| <i>Malus 'Jonathan'</i> | Dwarf Apple |
| <i>Prunus americana</i> | Dwarf Apricot |
| <i>Prunus 'Superior'</i> | Dwarf Plum |
| <i>Punica granatum</i> | Pomegranate |
| Palms | |
| <i>Brahea armata</i> | Mexican Blue Palm |
| <i>Erythea edulis</i> | Guadalupe Palm |
| <i>Phoenix dactylifera</i> | Date Palm |
| <i>Phoenix roebelenii</i> | Pigmy Date Palm |
| <i>Trachycarpus fortunei</i> | Windmill Palm |
| <i>Washingtonia filifera</i> | California Fan Palm |
| Vines/Espallars | |
| <i>Beaumontia grandiflora</i> | Easter Lily Vine |
| <i>Bougainvillea varieties</i> | Bougainvillea |
| <i>Distichtis 'Rivers'</i> | Royal Trumpet Vine |
| <i>Grewia caffra</i> | Lavender Star Flower |
| <i>Jasminum spp.</i> | Jasmine |
| <i>Parthenocissus tricuspidata</i> | Boston Ivy |
| <i>Punica granatum</i> | Pomegranate |
| <i>Pyrus kawakamii</i> | Evergreen Pear |
| <i>Rosa spp.</i> | Climbing Roses |
| <i>Vitis spp.</i> | Grape Vine |
| Shrubs | |
| <i>Abutilon spp.</i> | Flowering Maple |
| <i>Agave attenuata</i> | Agave |
| <i>Aloe spp.</i> | Aloe |
| <i>Buxus microphylla japonica</i> | Boxwood |
| <i>Camellia spp.</i> | Camellia |
| <i>Choisya ternata</i> | Mexican Mock Orange |
| <i>Chrysanthemum frutescens</i> | Marguerite Daisy |
| <i>Cistus spp.</i> | Rockrose |
| <i>Pelargonium ssp.</i> | Geranium |
| <i>Polystichum munitum</i> | Western Sword Fern |
| <i>Woodwardia fimbriata</i> | Giant Wood Fern |
| Herbaceous/Groundcover | |
| <i>Armeria maritima</i> | Sea Pink |
| <i>Chamaemelum nobile</i> | Chamomile |
| <i>Erigeron glaucus</i> | Seaside Daisy |
| <i>Erysimum 'Bowles Mauve'</i> | Wallflower |
| <i>Fragaria 'Montana de Oro'</i> | Beach Strawberry |
| <i>Heuchera varieties</i> | Coral Bells |

SOURCE: Blackbird Architects - January 2008

FIGURE 3.0-11

Proposed Project Landscape Plan

Circulation of the site is developed into a coherent network of pathways to orchestrate pedestrian and bike flows. Pedestrian safety would be enhanced by locating all required parking areas underground, thereby freeing up additional surface areas from the typical automobile conflicts. Additionally, a new bus stop would be included in the project, which is proposed to be situated along the City's primary transit corridor (State Street), to serve westbound commuters. The project also includes the installation of decorative paving at the State Street–Hitchcock Way intersection.

3.5.3 Applicant's Alternative (Office Buildings and Residential Condominiums)

Under the applicant's alternative, the applicant proposes to construct approximately 14,254 square feet of office space and 73 residential condominium units. The project proposes a total of 237 parking spaces (66 parking spaces for the office component, 162 parking spaces for the residential component, and 9 common/shared spaces). **Figure 3.0-12, Applicant's Alternative Site Plan**, shows the office and condominium building footprints and site details. **Figure 3.0-13, Applicant's Alternative Elevation Diagrams**, provides architectural renderings of the proposed office. **Figure 3.0-14, Applicant's Alternative Underground Parking Structure Plan**, shows the details of the proposed underground parking for the residential condominiums; which includes 5 parking spaces reserved for the office use.

The office buildings and residential condominium development would be on separate parcels. A lot line adjustment is required for this project to reduce the ultimate area of the office building property to an adjusted lot area of 1.06 acres. The proposed adjustment would leave a revised parcel of 3.52 acres available for the residential condominium project. **Table 3.0-3** shows the existing and proposed parcel sizes for the applicant's alternative.

Office Buildings

The proposed office use would be split between two buildings. The building in the southwest corner of the property would contain two offices, while the second building, to the east, would include three offices. Total floor area for the office uses would be 14,594 gross square feet (5,803 square feet for the west building and 8,791 square feet for the east building). Each building would be two stories in height and would be set back from the sidewalk on State Street a minimum of 20 feet. The buildings would have a Mediterranean architectural theme with covered entries to each office fronting State Street, along with second-story balcony features to break up the appearance of the south-facing elevation. A pedestrian-oriented plaza with a fountain feature would be installed within the street frontage of the offices.

A total of 66 parking would be provided for the office buildings. This would include 61 at-grade spaces on the north side of the buildings (52 spaces within a surface parking lot and 9 spaces on the entry driveway), and 5 spaces within the residential underground parking structure.

Residential Condominiums

The proposed residential condominiums would be similar to those described under the proposed project. The housing design envisions efficient compact residences and a cluster mix of nine separate unit types. The mix of units includes one-bedroom, two-bedroom, and three-bedroom units as follows: 18 one-bedroom units ranging from 829 to 903 square feet, 14 two-bedroom units ranging from 1,166 to 1,244 square feet; and 41 three-bedroom units ranging from 1,448 to 1,531 square feet. As with the proposed project, the applicant proposes to provide 11 of the 73 units (3 one-bedroom, 1 two-bedroom and 7 three-bedroom units) at levels affordable to middle-income buyers in accordance with the City of Santa Barbara's Inclusionary Housing Ordinance. These units would be subject to income and sales price restrictions pursuant to the City of Santa Barbara's Affordable Housing requirements. Residential units would be setback a minimum of 80 feet from the edge of the right-of-way. An open area is provided to separate the residential condominiums from State Street.

The condominiums would be two to three stories tall and constructed above an underground parking garage containing 162 parking stalls (123 of these parking stalls would be in private garages associated with an individual residential unit, 20 stalls would be open detached resident parking, 19 stalls would be open and available for guest parking). The total number stall in the underground parking structure would be 167 including the 5 stalls for use by the commercial offices. In addition, nine at-grade parking spaces (non-dedicated) would be available along the commercial driveway in the condominium area.

Landscaping

The applicant's alternative would provide for landscaping throughout the main project site. The applicant's alternative landscape plan is similar to that of the proposed project, and is illustrated in **Figure 3.0-15, Applicant's Alternative Landscape Plan**. As shown, landscaping along State Street would follow the City of Santa Barbara *Upper State Street Guidelines*. The project would result in the removal of approximately 205 trees. If possible, some trees (mature palms) may be retained and relocated on site as part of the landscaping plan. The Conceptual Landscape Plan Plant Palette is provided on **Figure 3.0-15**.



SOURCE: Blackbird Architects - October 2007

FIGURE 3.0-12

Applicant's Alternative Site Plan



North elevation along driveway 5



South elevation along State Street 4



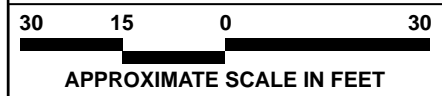
East elevation along driveway (west elevation identical) 3



East elevation along paseo 2



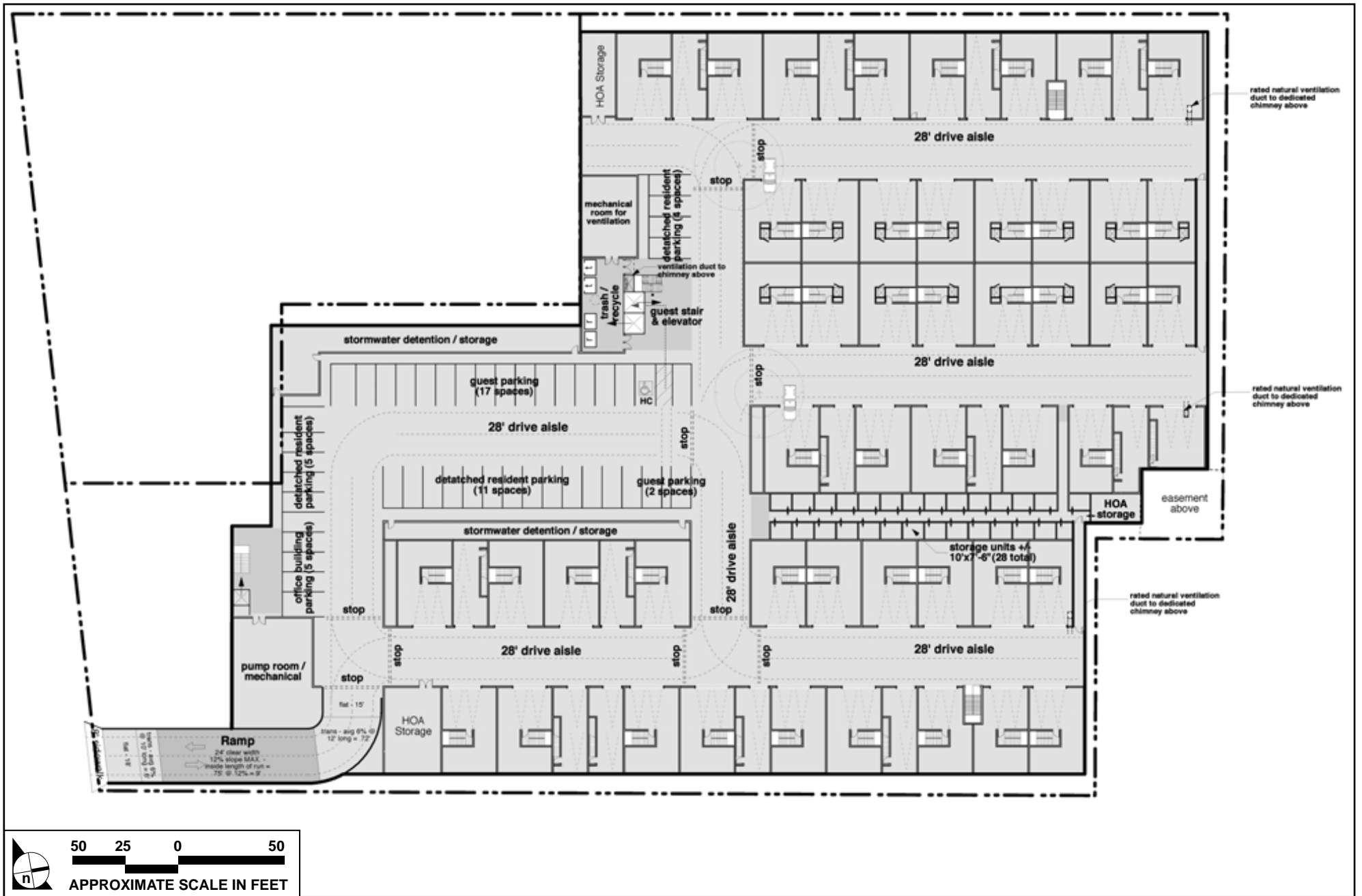
West elevation along paseo 1



SOURCE: Blackbird Architects - October 2007

FIGURE 3.0-13

Applicant's Alternative Elevation Diagrams



SOURCE: Blackbird Architects - January 2008

FIGURE 3.0-14

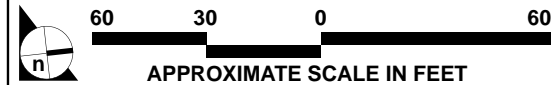
Applicant's Alternative Underground Structure Parking Plan



plant palette

plants such as

- Trees**
 - Arbutus unedo* Strawberry Tree
 - Brachychiton spp.* Bottle Tree
 - Cupressus sempervirens* Italian Cypress
 - Erythrina spp.* Coral Tree
 - Jacaranda mimosifolia* Jacaranda
 - Olea europea 'Fruitless'* Fruitless Olive Tree
 - Platanus racemosa* California Sycamore
 - Quercus agrifolia* Coast Live Oak
 - Strelitzia nicholi* Giant Bird of Paradise
- Screen Trees**
 - Eucalyptus citriodora* Lemon-scented Gum
 - Eucalyptus sideroxylon* Pink/red Ironbark
 - Populus nigra 'Italica'* Lombardy Poplar
 - Sequoia sempervirens* Coast Redwood
- Fruit Trees**
 - Citrus spp.* Orange, Lemon or Lime
 - Eriobotrya japonica* Loquat
 - Ficus spp.* Edible Fig
 - Fortunella margarita* Kumquat
 - Malus 'Garden Delicious'* Dwarf Apple Tree
 - Malus 'Jonathan'* Dwarf Apple
 - Prunus americana* Dwarf Apricot
 - Prunus 'Superior'* Dwarf Plum
 - Punica granatum* Pomegranate
- Palms**
 - Brahea armata* Mexican Blue Palm
 - Erythea edulis* Guadalupe Palm
 - Phoenix dactylifera* Date Palm
 - Phoenix roebelenii* Pigmy Date Palm
 - Trachycarpus fortune* Windmill Palm
 - Washingtonia filifera* California Fan Palm
- Vines/Espalliers**
 - Beaumontia grandiflora* Easter Lily Vine
 - Bougainvillea varieties* Bougainvillea
 - Distichlis 'Rivers'* Royal Trumpet Vine
 - Grewia caffra* Lavender Star Flower
 - Jasminum spp.* Jasmine
 - Parthenocissus tricuspidata* Boston Ivy
 - Punica granatum* Pomegranate
 - Pyrus kawakamii* Evergreen Pear
 - Rosa spp.* Climbing Roses
 - Vitis spp.* Grape Vine
- Shrubs**
 - Abutilon spp.* Flowering Maple
 - Agave attenuata* Agave
 - Aloe spp.* Aloe
 - Buxus microphylla japonica* Boxwood
 - Camellia spp.* Camellia
 - Choisya ternata* Mexican Mock Orange
 - Chrysanthemum frutescens* Marguerite Daisy
 - Cistus spp.* Rockrose
 - Pelargonium spp.* Geranium
 - Polystichum munitum* Western Sword Fern
 - Woodwardia fimbriata* Giant Wood Fern
- Herbaceous/Groundcover**
 - Armeria maritima* Sea Pink
 - Chamaemelum nobile* Chamomile
 - Erigeron glaucus* Seaside Daisy
 - Erysimum 'Bowles Mauve'* Wallflower
 - Fragaria 'Montana de Oro'* Beach Strawberry
 - Heuchera varieties* Coral Bells



SOURCE: Blackbird Architects - October 2007

FIGURE 3.0-15

Applicant's Alternative Landscape Plan

Access

Access to the office buildings would be provided by a driveway, which would be located between the proposed office and residential condominium uses. The condominiums would access an underground garage structure from a driveway located at the easternmost corner of the residential property.

Circulation of the site is developed into a coherent network of pathways to orchestrate pedestrian and bike flows. Pedestrian safety would be enhanced by locating all required residential parking underground, thereby freeing up additional surface areas from the typical automobile conflicts. Additionally, a new bus stop would be included in the project, which is proposed to be situated along the City's primary transit corridor (State Street), to serve westbound commuters. The project also includes the installation of decorative paving at the State Street–Hitchcock Way intersection.

3.5.4 New Town and Country Apartment Access

Access to the Town & Country Apartments, which are located immediately behind the main project site parcels, is currently provided through the main project site from State Street. Under both the proposed project and the applicant's alternative, this access would be permanently closed. A new access to the Town & Country Apartments would be provided via a driveway connection off of San Remo Drive, requiring demolition of one residential unit (located at 3715 San Remo Drive). A new trash enclosure for the Town & Country Apartments is also proposed. Private pedestrian access between the new residential condominium development and the Town & Country Apartments would be provided.

3.5.5 Construction Activities

Subsurface parking garages are proposed for both the proposed project and applicant's alternative, resulting in excavation up to 15 feet in depth, excluding foundation excavation. It is anticipated that excavation would total approximately 80,000 cubic yards of material for the proposed project or 60,000 cubic yards for the applicant's alternative. As with demolition waste, excavated materials would be transported from the site via the proposed haul route (see **Figure 3.0-6**). To facilitate the excavation, temporary shoring would be installed. Details regarding construction duration, equipment, construction workers, and vehicles are shown in **Table 3.0-4, Construction Program Information**.

It is anticipated that the project (either the proposed project or applicant's alternative) would generate 1,400 to 1,500 tons of construction waste in addition to the demolition waste identified in **Section 3.5.1**. For both demolition and construction debris, the applicant shall develop and implement a solid waste management plan to reduce waste generated by construction and demolition activities.

3.5.6 Project Schedule

Project construction, including demolition activities, would require two years and five months (124 weeks) for the proposed project or two years (104 weeks) for the applicant's alternative to complete, from the commencement of grading and shoring activities through building construction and landscaping. **Figure 3.0-16, Project Schedule and Phasing**, provides an estimate of the demolition and construction time frames.

**Table 3.0-4
Construction Program Information**

Phase	Program Item	Proposed Project	Applicant's Alternative
1	Hazardous Material Abatement		
	Schedule duration	5 weeks	5 weeks
	Equipment	Small tools Dumpsters Trucks as needed	Small tools Dumpsters Trucks as needed
	Construction workers	35-per-day average	35-per-day average
	Vehicles	12-per-day average	12-per-day average
2	Building Demolition and Site Clearing		
	Schedule duration	9 weeks	9 weeks
	Equipment	1 track excavator Cat 330 1 front-end loader Cat 973 5 end dumps 2 small bobcats Small tools and jack hammers	1 track excavator Cat 330 1 front-end loader Cat 973 5 end dumps 2 small bobcats Small tools and jack hammers
	Construction workers	10 per day average	10 per day average
	Vehicles	7 per day average	7 per day average
	Trucks	26 per day average	26 per day average
	Trips	1,200 truck trips	1,200 truck trips
3	Temporary Shoring and Mass Excavation		
	Schedule duration	10 weeks	8 weeks
	Equipment	1 hydraulic crane (120-ton) 1 gradeall forklift 434D 1 track excavator Cat350 1 front-end loader Cat 973 15 double-bottom dumps	1 hydraulic crane (120-ton) 1 gradeall forklift 434D 1 track excavator Cat350 1 front-end loader Cat 973 15 double-bottom dumps
	Construction workers	4 workers per day (excludes drivers)	4 workers per day (excludes drivers)
	Vehicles	4 per day average	4 per day average
	Trucks	120 per day average	120 per day average
	Trips	4,200 truck trips	3,150 truck trips

Phase	Program Item	Proposed Project	Applicant's Alternative
4	New Underground Parking Structure		
	Schedule duration	30 weeks	24 weeks
	Equipment	1 hydraulic crane (40-ton)	1 hydraulic crane (40-ton)
		2 gas-operated backhoes	2 gas-operated backhoes
		6 concrete trucks	6 concrete trucks
		1 hydraulic boom pump	1 hydraulic boom pump
		2 gas compressors	2 gas compressors
		1 skip loader	1 skip loader
		Small tools	Small tools
		Construction workers	20-per-day average
	Vehicles	12-per-day average	12-per-day average
Trucks	40 concrete trucks per day	40 concrete trucks per day	
5	Building Construction	Hotel and Condominiums	Office and Condominiums
	Schedule Duration	70 weeks	58 weeks
	Equipment	1 conventional crane (160-ton)	2 extended-boom forklifts
		2 extended boom forklifts	4 concrete trucks
		4 concrete trucks	1 hydraulic boom pump
		1 hydraulic boom pump	1 lumber delivery
		1 lumber delivery	1 steel and CMU delivery
		1 steel and CMU delivery	15 air compressors
		20 air compressors	Small tools
		Small tools	
Construction workers	40-80 per day	40-80 per day	
Vehicles	35-50 per day	35-50 per day	

3.6 DISCRETIONARY ACTIONS

3.6.1 Proposed Project

In order for the proposed project to proceed, the following discretionary approvals are required:

1. Lot Line Adjustment to transfer 1.88 acres from APN 053-300-031 to APN 053-300-023.
2. Design Review by the Architectural Board of Review (SBMC Section 22.68).
3. Tree Removal Application within the Front Yard Setback by the Parks & Recreation Commission.

For the Hotel Component of the Project:

3. Transfer of Existing Development Rights (TEDR) to transfer 806 square feet of non-residential square footage from 8 E. Figueroa (APN 039-282-001) to APN 053-300-031 (SBMC Section 28.95.030).
4. Development Plan approval for a net increase of 9,969 square feet of non-residential development (SBMC Section 28.87.300).
3. Development Plan approval for a building of 10,000 square feet or more of total floor area within the C-P Zone (SBMC Section 28.54.120).

For the Condominium Component of the Project:

5. Modification of the lot area requirements to allow one (1) over-density unit (bonus density) on a lot in the CP/S-D-2 and R-3/S-D-2 zone districts (SBMC Section 28.21.080).
6. Tentative Subdivision Map (TSM) for a one-lot subdivision to create 73 residential condominium units (SBMC Chapters 27.07 and 27.13).

3.6.2 Applicant's Alternative

In order for the applicant's alternative to proceed, the following discretionary approvals are required:

1. Lot Line Adjustment to transfer 2.16 acres from APN 053-300-031 to APN 053-300-023.
2. Design Review by the Architectural Board of Review (SBMC Section 22.68).
3. Tree Removal Application within the Front Yard Setback by the Parks & Recreation Commission.

For the Office Component of the Project:

3. Development Plan approval for a building of 10,000 square feet or more of total floor area within the C-P Zone (SBMC Section 28.54.120).

For the Condominium Component of the Project:

4. Modification of the lot area requirements to allow one (1) over-density unit (bonus density) on a lot in the CP/S-D-2 and R-3/S-D-2 zone districts (SBMC Section 28.21.080).
5. Tentative Subdivision Map (TSM) for a one-lot subdivision to create 73 residential condominium units (SBMC Chapters 27.07 and 27.13).

3.6.3 Other Approvals

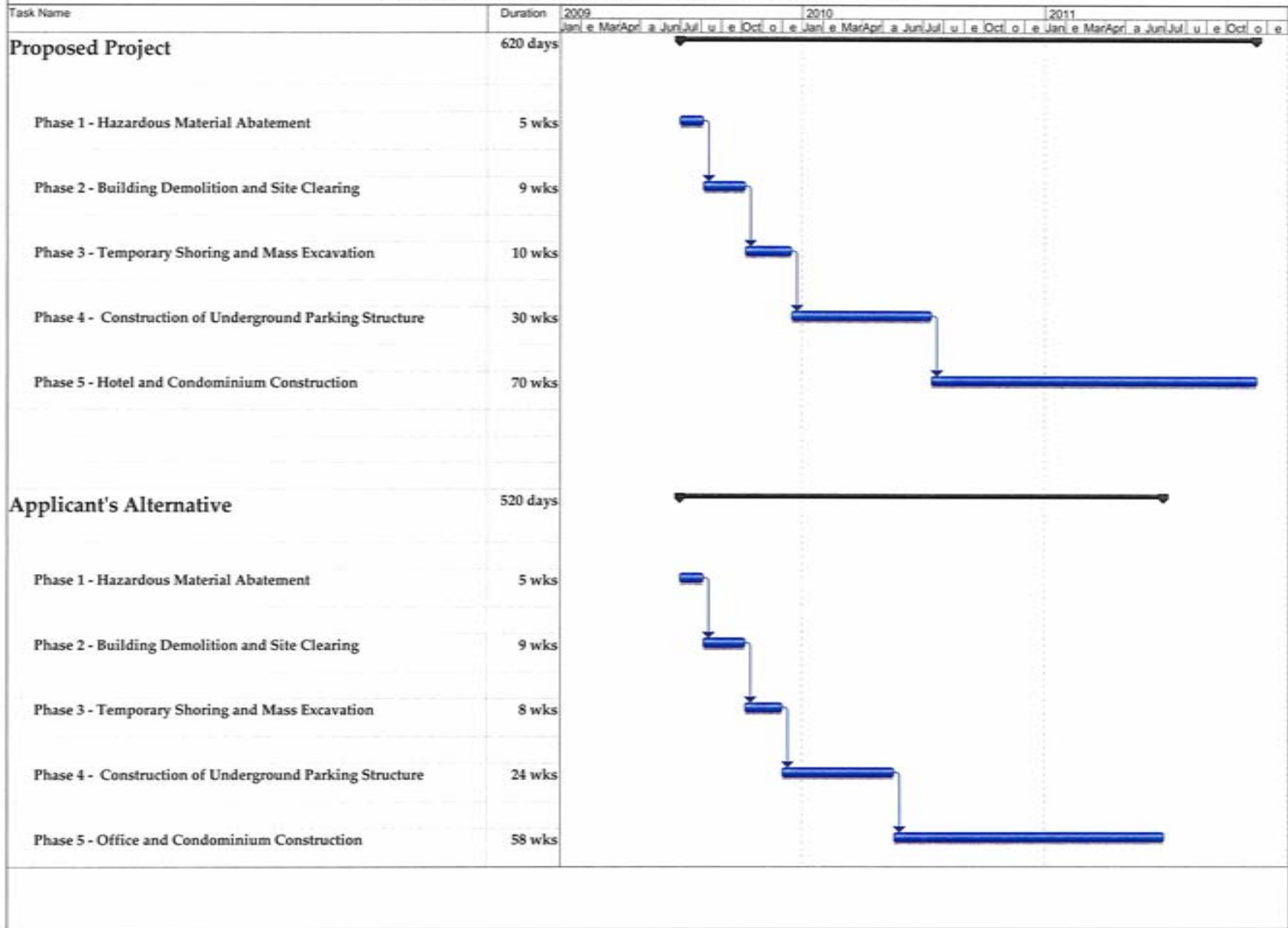
The following responsible agencies have discretionary approval authority over one or more actions involved with the development of the proposed project:

State Water Resources Control Board (SWRCB): Issuance of a Notice of Intent under the State General Construction Permit for authorization of storm water discharges.

Regional Water Quality Control Board (RWQCB): Issuance of a National Pollutant Discharge Elimination System (NPDES) permit for permanent dewatering of groundwater, if needed.

Santa Barbara County Air Pollution Control District (SBAPCD): Issuance of a Permit for Demolition and Renovation Compliance Checklist.

Sandman Inn Redevelopment Project Construction Schedule



SOURCE: Blackbird Architects - January 2008

FIGURE 3.0-16

Project Schedule and Phasing

4.0 CUMULATIVE SCENARIO

4.1 INTRODUCTION

Cumulative impacts refer to the combined effects of project impacts with the impacts of other past, present, and reasonably foreseeable future projects. Both the California Environmental Quality Act (CEQA) and the *State CEQA Guidelines* require that cumulative impacts be analyzed in an environmental impact report (EIR). As set forth in the *State CEQA Guidelines*,¹ the discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. As stated in CEQA, “a project may have a significant effect on the environment if the possible effects of a project are individually limited but cumulatively considerable.”²

According to the *State CEQA Guidelines*,

“Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable and which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.*
- (b) The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*³

In addition, the *State CEQA Guidelines* require either

A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside control of the agency, or

*A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.*⁴

¹ California Public Resources Code, Title 14, Division 6, Chapter 3, *State CEQA Guidelines*, Section 15130(b).

² *Ibid.*, Section 21083(b).

³ *Ibid.*, Section 15355.

⁴ *Ibid.*, Section 15130(a)(1).

Cumulative impact discussions for each issue area are provided in the technical analyses contained within **Sections 6.0, Air Quality; 7.0, Transportation and Circulation; and 8.0, Visual Aesthetics.**

As previously stated, and as set forth in the *State CEQA Guidelines*, related projects consist of “closely related past, present, and reasonable foreseeable probable future projects that would likely result in similar impacts and are located in the same geographic area.”⁵ Specific projects proposed or currently under development were identified by the City of Santa Barbara and are listed in **Table 4.0-1, Cumulative Projects Within 1 Mile Radius of the Project Site**, and **Table 4.0-2, Cumulative Projects Greater Than 1 Mile Radius of the Project Site.**

⁵ California Public Resources Code, Title 14, Division 6, Chapter 3, *State CEQA Guidelines*, Section 15355.

**Table 4.0-1
Cumulative Projects Within 1 Mile Radius of the Project Site**

ID	ADDRESS	CASE NO.	APN	NET NEW UNITS	NET NEW S.F.	STATUS*	Description	Dedicated Assignment of Trips in Project Analysis	Notes
Project Directly Included in Cumulative Analyses									
5	540 W. PUEBLO ST	MST2007-00092	025-090-046	5	43,608	P	Demolish 18,690 square feet (sf) of existing 20,130-sf medical facility and accessory structures, to be reconstructed further away from Mission Creek, and demolish six existing residential buildings. Construction of a new 52,069-sf, three-story, Cancer Center, a 56,422 sf, four-story, 164 space, parking structure, an 18 space parking lot, for a total of 182 on-site parking spaces, and 3 new residential buildings totaling 6,739 sf. The proposal will result in 53,509 sf of commercial space and 6 new residential units, for a total of 11 residential units.	Yes	
44	3757 STATE ST	MST2005-00156	051-040-046	15	15,664	P	72,209 sf commercial/retail, 15 residential units, 303 parking spaces, remove the existing commercial 56,545 sf	Yes	
45	3305 STATE ST	MST2004-00408	051-100-001		1,638	P	Add 1,638 sf to Gelson's Market	Yes	
50	301 S. HOPE AVE	MST2003-00135	051-240-019		466	Completed	Add 466 sf, 4 service bays, relocate existing wash bay, add 1 wash bay and convert existing 408 sf storage to training room	Yes	While the project has been completed, the trips for these additions were included since some of the traffic counts provided were conducted before the project completion date.
57	3885 STATE ST	MST2008-00180	051-022-012	30	-24,635	P	Demolish the existing motel and office buildings. The new construction includes three commercial spaces, 34 market rate one-bedroom lofts, 10 affordable one-bedroom lofts	Yes	
58	101 S. LA CUMBRE	MST2008-00084	051-022-027		2,186	P	Demolish 1,656-sf gas station and add 6,745-sf commercial building	Yes	
59	15 S.HOPE AVE	MST2006-00682	051-040-058	16	-7,218	P	Remove an existing commercial structure and construct 16-unit condo and 360-sf commercial and 10,780-sf garage.	Yes	
70	3880 STATE ST	MST2006-00185	057-240-046	8	1,733	A	Demolish vacant nursery buildings, add mixed-use building with 4,916 new commercial sf and 7 new condos	Yes	

ID	ADDRESS	CASE NO.	APN	NET NEW UNITS	NET NEW S.F.	STATUS*	Description	Dedicated Assignment of Trips in Project Analysis	Notes
Project Included within Ambient Growth Rate									
43	121 S. HOPE F123	MST2008-00020	051-010-014		64	A	Tenant improvements and a facade remodel for a new Louis Vuitton retail store at La Cumbre Plaza. The proposal will consolidate two existing retail stores (F123 and F125) into one tenant space and the addition of 64 sf.	No	These projects generate minimal additional trips over existing uses or have no trips assigned through analyzed Intersections. Trips for these projects are included through incremental ambient growth of existing volumes.
46	29 W. CALLE LAURELES	MST2002-00575	051-122-004	5	0	I	Five, new, three-story, two-bedroom condominium units above a new parking structure, on a 17,400-sf lot with an existing 6,580-sf commercial building.	No	
47	222 W. ALAMAR AVE	MST2006-00318	051-213-008	2		A	Demolish an existing 663-sf single-family residence and detached 220-sf garage and construct three two-story condominium units totaling 2,409 sf on the 6,000-sf lot. Four parking spaces will be provided in three attached garages totaling 1,070 sf.	No	
48	2840 DE LA VINA ST	MST2008-00127	051-220-023	0	521	PA	Expand an existing equipment mezzanine by 521 sf for an employee break room within the existing building. The proposal also includes the removal of three existing trees, six new trees, a change to the existing parking lot planters, and the addition of three new parking spaces.	No	
49	350 HITCHCOCK WAY	MST2007-00613	051-240-003		1,008	A	Improvements to an existing automobile dealership building to include the construction of a 2,100-sf canopy on the south elevation, enclose 2,008 sf of the existing covered northwest and southwest corners of building A, add rolling garage doors to the existing service bays (building B) and demolish 1,000 sf of building B. The project scope includes ADA requirements, a new trash enclosure, and increase landscape areas.	No	
53	3325 MADRONA DR	MST2003-00703	053-324-002	1		I	Convert the existing second-floor space over the garage into a secondary dwelling unit of an existing 2,211-sf single-family residence with an attached two-car garage.	No	
54	3060 STATE ST	MST95-00596	053-342-032	0	819	I	Review of an "as-built" water storage tank, a 150-sf storage area, and three vacuum units to an existing automotive service station. Proposed interior and exterior remodeling for the conversion to a mini-market/auto service station.	No	
60	110 ONTARE HILLS LN	MST2008-00061	055-160-057	1		P		No	
61	112 ONTARE HILLS	MST2007-00430	055-160-058	1		A		No	
62	101 ONTARE HILLS LN	MST2007-00440	055-160-062	1		A		No	
63	281 SCHULTE LN	MST2008-00264	055-230-002	1		A		No	
64	288 SCHULTE LN	MST2001-00525	055-230-003	1		I	2,988-sf residence	No	
65	560 N. LA CUMBRE	MST2005-00688	057-143-002	5	10,600	P	Add 10,600 sf (the sanctuary building and five residences) to an existing church	No	

ID	ADDRESS	CASE NO.	APN	NET NEW UNITS	NET NEW S.F.	STATUS*	Description	Dedicated Assignment of Trips in Project Analysis	Notes
Project Included within Ambient Growth Rate (continued)									
66	3834 LA CUMBRE HILLS LN	MST2007-00226	057-170-009	1		A		No	
67	*COUNTY PROPERTY* N. HOPE	MST2006-00564	057-170-012	9		P		No	
68	4004 VIA LUCERO	MST2003-00084	057-210-028	10		I	Demolish existing residential and commercial, construct 13 new condos (10 two-bedroom units and 3 three-bedroom units)	No	
69	85 N. LA CUMBRE RD	MST2005-00295	057-233-010	-1		A	Demolish existing 10 units and construct 9 new condos	No	
	TOTAL			112	46,454				

* Status Abbreviations:

P=Pending

A=Approved (design review approval or Planning Commission approval with no design review required)

PCA=Planning Commission approved, design review required

PA=design review preliminary approval

I=building permit issued

**Table 4.0-2
Cumulative Projects Greater Than 1 Mile Radius of the Project Site**

ID	ADDRESS	CASE NO.	APN	NET NEW UNITS	NET NEW S.F.	STATUS*	Description
1	319 W. ALAMAR AVE	MST2006-00385	025-012-002	3		P	Merge four parcels, demolish 4 single-family residences and construct 7 new condos
2	2411 BATH ST	MST2008-00132	025-053-007		155	P	
3	517 W. JUNIPERO ST	MST2007-00465	025-090-009	-3	1,800	I	
4	510 W. PUEBLO ST	MST2007-00302	025-090-020	-1	976	I	Demolish the existing SFR and 324-sf garage and construct a 976-sf commercial office
6	2305 DE LA VINA ST	MST2006-00717	025-112-011		34	A	
7	2222 BATH ST	MST2007-00069	025-181-019		74	P	
8	509 W. LOS OLIVOS ST	MST98-00231	025-210-004	-1	832	PCA	
9	505 W. LOS OLIVOS ST	MST2007-00470	025-210-012	9		P	
10	422 W. PADRE ST	MST2006-00496	025-221-018	1		A	
11	2028 CASTILLO ST	MST2004-00790	025-292-028	2		A	Demolish the existing 1,991-sf duplex and 461-sf garage and construct 4 condos (two 1,565-sf two-bedroom units and two 1,839-sf one-bedroom units)
12	328 W. PEDREGOSA ST	MST2005-00407	025-352-019	1		A	
13	432 W. ISLAY ST	MST2005-00512	027-011-016	2		P	
15	1819 DE LA VINA ST	MST2002-00242	027-021-012	4		I	
17	1123 MANITOU RD	MST2004-00361	041-010-035	1		I	
26	2032 OAK AVE	MST2008-00013	043-091-007	1		P	

ID	ADDRESS	CASE NO.	APN	NET NEW UNITS	NET NEW S.F.	STATUS*	Description
27	2032 MODOC RD	MST2005-00115	043-091-011	1		I	remove the existing 420-sf garage, add 860-sf two story (427-sf garage, 433-sf residence), 60-sf addition on one-story residence
28	802 W. PEDREGOSA ST	MST2005-00724	043-121-014	1		I	
29	826 W. PEDREGOSA ST	MST2008-00011	043-121-020	1		A	
30	720 W. PEDREGOSA ST	MST2004-00742	043-122-016	1		A	
31	1809 SAN ANDRES ST	MST2005-00464	043-152-013	1		PCA	
32	1812 & 1814 SAN PASCUAL ST	MST2006-00411	043-163-011	1		P	
33	1822 SAN PASCUAL ST	MST2004-00546	043-163-013	5		I	
34	1720 SAN ANDRES ST	MST2008-00066	043-191-015	1		P	
37	1298 LAS POSITAS RD	MST2007-00492	047-010-034		520	A	New 2,080-sf equipment storage building with an attached 390-sf carport and unroofed trash enclosure at Elings Park. The proposal will result in an additional 520 sf of new non-residential floor area.
38	1235 VERONICA SPRINGS RD	MST2003-00793	047-010-039	112		P	Demolish the existing 28,700-sf Hillside House facility and construct 127 new dwelling units, admin office, community center, leasing office, non-profit space, and therapy pool
	900-1100 LAS POSITAS RD	MST99-00608	047-010-016 et. al.	25		PCA	"Veronica Meadows" project.
42	900 CALLE DE LOS AMIGOS	MST2002-00002	049-040-050	-1		I	
55	2559 PUESTA DEL SOL	MST2004-00879	023-271-003		4,736	P	Proposal for Mission Creek Restoration plan and five-year plan for Museum of Natural History for small additions/relocations

ID	ADDRESS	CASE NO.	APN	NET NEW UNITS	NET NEW S.F.	STATUS*	Description
56	1298 LAS POSITAS RD	MST2006-00509	047-010-034		14,328	P	Improvements to Elings Park North (including community center building, two multi-use playing fields, a multi-sport arena, a family activity zone, a park services building, restrooms, parking lots, etc.) and Elings Park South (including a BMX track with exterior lighting, park office building, a new parking lot, a disc golf course, picnic areas).
71	4151 FOOTHILL RD	MST2008-00496	059-160-017		69,259	P	annexation and construction of 60,000-sf office building

* Status Abbreviations:

P=Pending

A=Approved (design review approval or Planning Commission approval with no design review required)

PCA=Planning Commission approved, design review required

PA=design review preliminary approval

I=building permit issued

5.0 LAND USE AND POLICY CONSISTENCY

5.1 INTRODUCTION

This chapter provides analysis of the potential consistency of the project with applicable land use and *City of Santa Barbara General Plan* policies. The following discussion focuses on the consistency of the primary entitlement actions of the proposed project and applicant's alternative with the City's general plan, Municipal Code, and City Charter. Additionally, because of the project's location in the Upper State Street area, this section provides a discussion of the consistency with the *Upper State Street Study* (USSS).

A detailed evaluation of the consistency of the proposed project and the applicant's alternative with the City Charter, the general plan, the Zoning Ordinance and the USSS is provided in **Appendix 5.0**. Additionally, an evaluation of the consistency of the proposed project and the applicant's alternative with the *Architectural Board of Review Guidelines* and the *Upper State Street Area Design Guidelines* is provided in **Appendix 8.0**, and is summarized in **Section 8.0**.

Land use issues can also result in secondary impacts, including traffic and air pollutant generation. These impacts are addressed in their respective chapters throughout this environmental impact report (EIR) (**Section 6.0, Air Quality**, and **Section 7.0, Transportation and Circulation**). In addition, specific urban design issues and policies are addressed in **Section 8.0, Visual Aesthetics**.

5.2 PROJECT FEATURES

The proposed project and the applicant's alternative incorporate several components that together comprise the project under the California Environmental Quality Act (CEQA).

5.2.1 Proposed Project

The proposed project characteristics and associated discretionary actions are listed in **Section 3.0** and include

- demolition of the existing 113-room Sandman Inn hotel, adjacent restaurant, and all site improvements including vegetation;
- construction of a 106-room hotel and 73 residential condominium units. This would include a total of 291 parking spaces with 1 at-grade and 110 underground parking spaces for the hotel component, 163 underground parking spaces for the residential component and 17 at-grade common/shared spaces; and
- construction of a new driveway access from the Town & Country Apartments to San Remo Avenue, necessitating demolition of an existing residential unit.

5.2.2 Applicants Alternative

The applicant's alternative characteristics and associated discretionary actions are listed in **Section 3.0** and include

- demolition of the existing 113-room Sandman Inn hotel, adjacent restaurant, and all site improvements including vegetation;
- construction of an office building of approximately 14,254 square feet of office space and 73 residential condominium units. The proposed office use would be split between two separate buildings. This would include a total of 237 parking spaces with 66 parking spaces (61 spaces at-grade and 5 spaces underground) for the office component, 162 underground parking spaces for the residential component, and 9 at-grade common/shared spaces; and
- construction of a new driveway access from the Town & Country Apartments to San Remo Avenue, necessitating demolition of an existing residential unit.

5.3 EXISTING DEVELOPMENT AND SURROUNDING CONDITIONS

As described in **Section 3.0, Project Description**, the project site is located in an urban environment in the North State Street and San Roque neighborhoods of the City of Santa Barbara.

Existing development in the project vicinity includes a mix of buildings containing retail, commercial, office, and residential uses. Existing structures on the main project site include a 5,050-square-foot restaurant and the Sandman Inn hotel, with 113 available hotel rooms. The existing structures are relatively low-profile, 1960s-style buildings distributed throughout the property, interspersed with parking and open areas, and include ample mature landscaping.

The main project site also provides for access to the Town & Country Apartments from State Street through the Sandman Inn parking area. Behind the main project site are the Town & Country Apartments and a duplex (3715 San Remo Drive).

The project site is located on the north side of State Street in an area identified as the Upper State Street corridor. The Upper State Street area of the City is primarily in residential use (44 percent). Zoning in the Upper State Street area provides for low-density residential use with commercial, office, and hotel uses indicated for much of the State Street frontage and La Cumbre–State Street area.

As shown on **Figure 3.0-5**, a variety of uses lie adjacent to the project site, including:

- North: apartment buildings and condominiums;
- South: State Street and commercial uses (restaurants, car wash, bank, retail, etc.);

- East: office buildings; and
- West: banks and office buildings.

5.4 EXISTING LAND USE

The main project site is 4.58 acres and is composed of two adjacent parcels (APNs 053-300-023 and 053-300-31; 3714, 3740, and 3744 State Street). The project also involves two additional parcels (APNs 053-300-032, 1.0 acre [Town & Country Apartments at 3730 State Street] and 053-222-010, 0.20 acres [an existing duplex at 3715 San Remo Street]).

The main project site (proposed hotel or office buildings, and condominiums) is located immediately northeast of the State Street–Hitchcock Way intersection (see **Figure 3.0-4**). The main project site and immediate areas to the east and west are part of the North State neighborhood. This neighborhood is an intensively developed commercial strip containing a scattering of multiple-family residential development; mobile home parks are also located on the periphery. The Town & Country Apartments (3730 State Street) and existing duplex (3715 San Remo Drive) parcels are in the San Roque neighborhood of the City of Santa Barbara.

The characteristics of the entire project site are listed in **Table 3.0-1**.

The main project site is zoned C-P/S-D-2 (Restricted Commercial Zone/Special District – Upper State Street Area), C-P/R-3/S-D-2 (Restricted Commercial Zone/Multiple Residence Zone/Special District – Upper State Street Area) and C-P/R-4/S-D-2 (Restricted Commercial Zone/Hotel-Motel-Multiple Residence Zone/Special District – Upper State Street Area) and has land use designations of General Commercial/Offices, Residential–12 units per acre, and Buffer on the general plan Land Use Map.

The other involved parcels are zoned R-2/S-D-2 (Two-Family Residence Zone/Special District – Upper State Street Area) and designated Residential 12-units per acre on the Land Use Map (APN 053-222-010; duplex), and zoned R-4/S-D-2 (Hotel-Motel-Multiple Residence Zone/Special District – Upper State Street Area) and designated Residential 12–units per acre per the Land Use Map (APN 053-300-032; apartments).

Figure 5.0-1, Existing General Plan Designations, and **Figure 5.0-2, Existing Zoning,** illustrate the existing land use and zoning designations on the project site and in the surrounding area.

5.5 POLICY CONSISTENCY ANALYSIS SUMMARY

A detailed evaluation of the consistency of the proposed project and the applicant's alternative with the City Charter, the general plan, the Zoning Ordinance and the USSS is provided in **Appendix 5.0**. This section summarizes that analysis and identifies areas of potential inconsistency. Additionally, an evaluation of the proposed project and applicant's alternative with the *Architectural Board of Review Guidelines* and the *Upper State Street Area Design Guidelines* is provided in **Appendix 8.0**, and is summarized in **Section 8.0**.

5.5.1 City Charter

The Charter of the City of Santa Barbara was adopted by the City Council of Santa Barbara, California on May 2, 1967.¹ Section 1507 declares that it is the City's policy that its land development does not exceed its public services and physical and natural resources, including but not limited to water, air quality, wastewater treatment capacity, traffic and transportation capacity, and affordable housing supply. Section 1508 (also referred to as "Measure E") addresses "Non-Residential Growth Limitations," and places limitations on nonresidential development through adoption of general plan amendments and subsequent adoption of ordinances and resolutions that set limits to commercial growth. The growth limitations are intended to restrict nonresidential development from the previously existing general plan potential of 116 million square feet to no more than 3 million square feet over a 20-year planning period beginning January 1, 1990. Allowable square footage is allocated among approved and pending projects (at the time the charter amendment was enacted), vacant property, small additions, and "community priorities."

Notwithstanding the development restrictions established above, the City Council may approve nonresidential development projects determined by the council to promote economic development from a pool of square footage of all those "Approved" or "Pending" projects which have expired and any accrued and unused development square footage from the annual allotments in the "Small Additions" category. In order to approve a nonresidential project, a finding must be made that resources would be available and traffic improvements would be in place at the time the project is ready for occupancy. "Community Priority Projects" are not required to make these findings. Community Priority Projects are defined as those found by the City Council as necessary to meet present or projected needs directly related to public health, safety, or general welfare. One of the goals of Charter Section 1508 was to encourage redevelopment of existing sites; however, it does not specifically address change of use to higher-intensity uses.

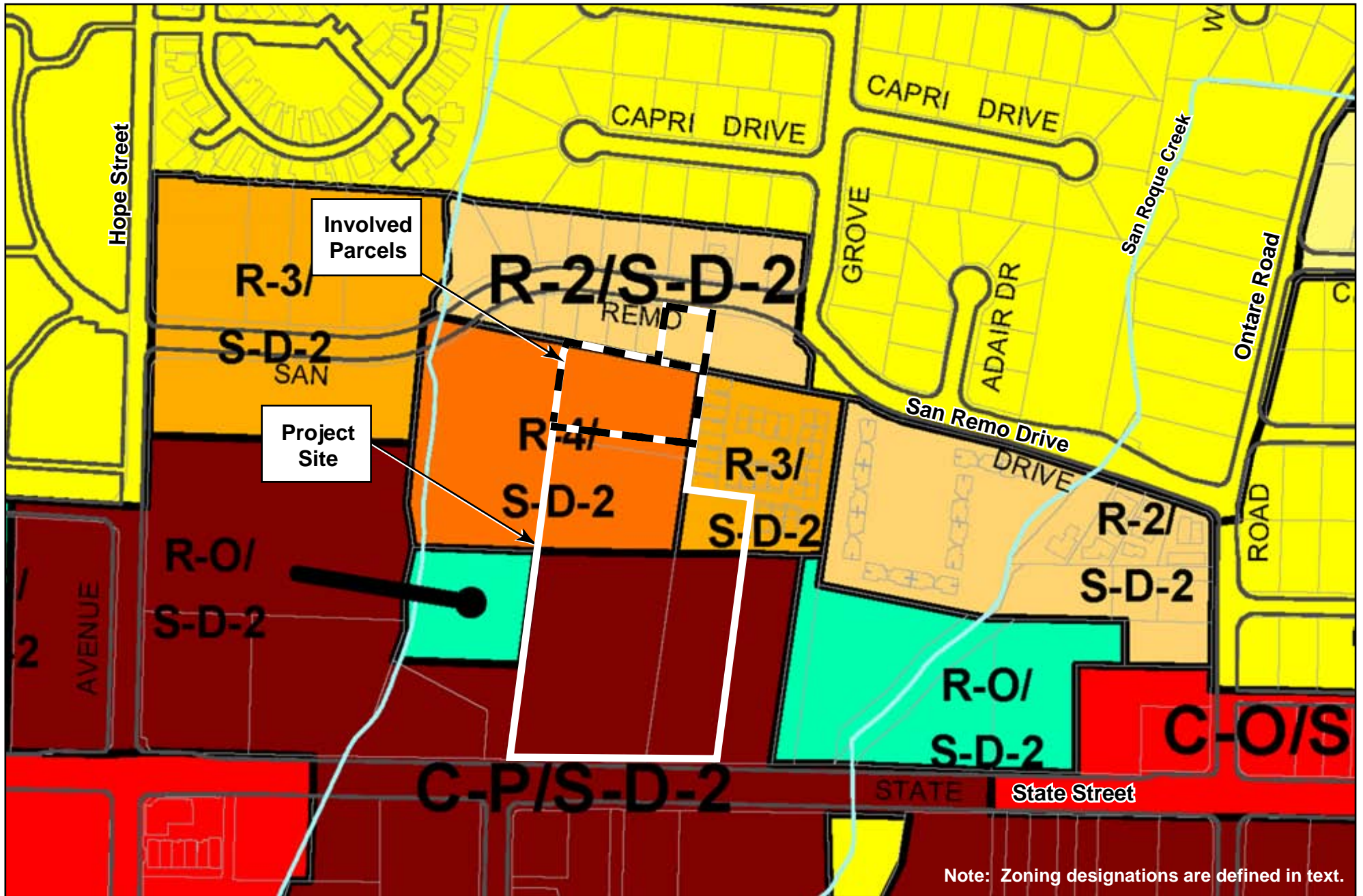
¹ City of Santa Barbara, City Charter, amended 1982.



SOURCE: City of Santa Barbara General Plan - March 2009

FIGURE 5.0-1

Existing General Plan Designations



SOURCE: City of Santa Barbara Zoning Map - April 2006

FIGURE 5.0-2

Existing Zoning

Consistency Analysis

Proposed Project

The proposed project can be adequately served by public services (water, sewer, etc.) and would not exceed the City's physical or natural resources (water, air quality, traffic and transportation capacity, and affordable housing supply). Because the project involves nonresidential development, it must comply with the growth limitations implemented by Charter Section 1508. The nonresidential development proposed (hotel) utilizes the Hotel Room for Room Replacement Project category for the majority of the project square footage. An additional 806 square feet is proposed to be transferred from another property through a Transfer of Existing Development Rights (TEDR). As identified during environmental review of the project, adequate resources, including traffic improvements, are available to serve the development. Therefore, the project can be found consistent with the City Charter.

Applicant's Alternative

The applicant's alternative would replace the hotel use in the proposed project with two office buildings totaling approximately 14,600 square feet. Because this development would involve less nonresidential development than the existing hotel located on site, this project would result in approximately 37,746 square feet of nonresidential development square footage being "banked" on the project site and potentially available for transfer to another site through a TEDR. The applicant's alternative can be adequately served by public services (water, sewer, etc.) and would not exceed the City's physical or natural resources (water, air quality, traffic and transportation capacity, and affordable housing supply). Adequate resources are available to serve the development. Therefore, the project can be found consistent with the City Charter.

5.5.2 General Plan

This section provides a discussion of the proposed project's and the applicant's alternative's consistency or inconsistency with the City general plan elements, including the Land Use Element, Circulation Element, Conservation Element, Housing Element, Noise Element, and Seismic Safety-Safety Element.

Land Use Designation

The main project site has land use designations of General Commercial/Offices, Residential-12 units per acre, and Buffer on the general plan Land Use Map. The proposed use as either a hotel and residential development or an office and residential development would be consistent with the General Commercial/Offices and Residential-12 units per acre designations.

The Buffer designation appears in the general plan Land Use Map as a narrow (estimated as approximately 50-75 feet in width) area crossing the project site from east to west. **Figure 5.0-3, Project Vicinity Land Use Designations**, illustrates the approximate location of the project site on the general plan Land Use Map. Based on scaling the 1964 General Plan Map, the Buffer designation is identified as located approximately 250 feet north of State Street. The General Plan does not provide a definition of the Buffer designation, but it is defined in the City's Local Coastal Plan as follows: "The purpose of this classification is to signify the need for a separation between potentially conflicting uses or an area of transition between land uses not directly compatible."² Within the proposed project site, as shown in the Land Use Map, the Buffer area separates the General Commercial/Offices area from the Residential-12 units per acre area. Based on the information currently available, the Buffer designation may be interpreted as indicating a physical area of unspecified dimensions between planning areas, or as a line of demarcation between incompatible uses.

The City's Zoning Ordinance and Map, which implement the land use designations provided in the general plan, do not contain a Buffer zone. It would appear that the Zoning Ordinance implements the needed separation between potentially incompatible uses acknowledged by the Buffer through the establishment of setback requirements. As shown in **Figure 5.0-4, Project Plan with Buffer Designation**, the Buffer area follows a similar alignment to the border between the CP and R-4/R-3 zoning designations.

If the Buffer designation is interpreted as requiring an open space area in the specified location, the proposed project and the applicant's alternative would be inconsistent with the Land Use Map, as both would locate residential development in areas with the Buffer designation. If the Buffer designation is interpreted as requiring only the separation of incompatible uses, the proposed project and the applicant's alternative would be consistent with the Land Use Map, as the proposed commercial uses would only be located south of the buffer, and only residential uses would be located north of the buffer. Additionally, the proposed commercial uses would be adequately separated from proposed residential uses by access driveways and open space areas. The City Planning Commission will ultimately determine whether either the proposed project or the applicant's alternative is consistent with General Plan land use designations. The Buffer designation is used to demark a "buffer" area between more intense commercial-type uses and less intense residential uses. Along the main project site, the Buffer designation is used to demark a buffer between commercial and residential land uses. The project is consistent with the goal of the buffer land use because the proposed commercial uses would only be located south of the buffer, and only residential uses would be located north of the buffer. Additionally, the proposed commercial uses would be adequately separated from proposed residential uses by access driveways and open space areas.

² City of Santa Barbara, *Local Coastal Plan*, (2004) 207.




SOURCE: City of Santa Barbara Community Development Department - 2009

FIGURE 5.0-3

Project Vicinity Land Use Designations



Legend:

 Approximate Location of "Buffer" designation

R-3 Limited Multiple-Family Residence Zone

R-4 Hotel-Motel-Multiple Residence Zone

C-P Restricted Commercial Zone



NOT TO SCALE

SOURCE: City of Santa Barbara Community Development Department - 2009

FIGURE 5.0-4

Project Plan with Buffer Designation

Land Use Element

Goals in the Land Use Element that are applicable to the proposed project and the applicant's alternative include:

- The City shall live within its resources by balancing development with available resources and maintaining the established character of the City.
- Ensure affordable housing opportunities for all economic levels of the community.
- Maintain the unique desirability of Santa Barbara as a place to live, work, and visit.
- Provide safe and convenient transportation through improved traffic and circulation and increased parking.

Both the proposed project and the applicant's alternative are substantively consistent with these goals. Neither project would have significant unavoidable impacts on City services, and both would be consistent with existing land use and zoning designations. Each project would provide 11 additional affordable housing units within the City. Both projects would provide residential and employment opportunities within the City, and each is consistent with existing land use and zoning designations for the site. Adequate on-site parking would be provided. The proposed new bus stop would improve public transit facilities in the area, and an expanded sidewalk right-of-way would improve pedestrian circulation along State Street.

Circulation Element

The Circulation Element addresses the requirements of state law, which are to evaluate the transportation needs of the community and to present a comprehensive plan to meet those needs.³ In addition, the Circulation Element contains measures for the implementation of the comprehensive goal and vision statement, from which all the goals, policies, and implementation strategies of the Circulation Element are derived. Implementation of specific goals are accomplished through a three-phased process of (1) establishing defined benchmarks or objectives, (2) monitoring and measuring policy impacts and results, and (3) developing City-initiated response strategies.

Traffic and circulation studies have been prepared for the proposed project and applicant's alternative, which used the City's standards to analyze potential traffic impacts, and are contained in **Section 7.0, Transportation and Circulation**, of this EIR and **Appendix 7.0**. Mitigation measures, where necessary, are included to ensure that potential traffic impacts are reduced to a less than significant level. With

³ City of Santa Barbara, *General Plan*, "Circulation Element," adopted November 1997.

implementation of these measures, the proposed project and applicant's alternative could be considered consistent with the applicable goals of the Transportation Element.

Conservation Element

The purpose of the Conservation Element is to provide a "comprehensive planning program which protects the land and water resources" under the City's jurisdiction. State law directs that a broad range of natural resources be addressed. Because the City of Santa Barbara is an urbanized community, the Conservation Element covers cultural and historical resources, visual resources, air quality, biological resources, drainage and flood control, and water resources, as discussed in the sections that follow.⁴

Cultural Resources

The cultural resources section of the general plan Conservation Element identifies archaeological (i.e., prehistoric), historical, and architectural resources within the City.⁵ Such resources are identified based on criteria provided by the Federal Advisory Council on Historic Preservation:

Districts, sites, buildings, structures, and objects of State and local importance that possess integrity of location, design, setting, materials, workmanship, feelings, and association and:

- *That are associated with events that have made a significant contribution to the broad patterns of our history; or*
- *That are associated with the lives of persons significant in our past; or,*
- *That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction; or,*
- *That have yielded, or may be likely to yield information in history or prehistory.⁶*

The project site is currently developed with a hotel built in the 1950s and does not include architecture of Hispanic tradition. As a developed site, there are no known archaeological or historic resources on the site. Additionally, the City's Urban Historian determined that the existing structures on site are not historically or architecturally significant. The proposed project and applicant's alternative are consistent with the Cultural Resources section of the Conservation Element, and any impacts would be less than significant.

⁴ City of Santa Barbara, *General Plan, "Conservation Element,"* amended July 1994.

⁵ *Ibid*, 45.

⁶ *Ibid*, 6.

Visual Resources

The Visual Resources section of the Conservation Element identifies visual and scenic resources within the City.⁷ Visual resources are defined as “those areas possessing aesthetic qualities attributable to natural or structural amenities,” and “those places from which scenic areas can be viewed.” The Visual Resources section identifies creeks, hillsides, shoreline areas, specimen and street trees, and open space areas as visual resources.

The following goals and policies related to visual resources are identified in the Conservation Element and are considered applicable to the proposed project and applicant’s alternative:

Goals

- Protect and enhance the scenic character of the City.
- Maintain the scenic character of the City by preventing unnecessary removal of significant trees and encouraging cultivation of new trees.

Policies

- 3.0: New development shall not obstruct scenic view corridors, including those of the ocean and lower elevations of the City viewed respectively from the shoreline and upper foothills, and of the upper foothills and mountains viewed respectively from the beach and lower elevations of the City.
- 4.0: Trees enhance the general appearance of the City’s landscape and should be preserved and protected.

Implementation Strategies

- 4.1 Mature trees should be integrated into project design rather than removed. The Tree Ordinance should be reviewed to ensure adequate provision for review of protection measures proposed for the preservation of trees in the project design.
- 4.2 All feasible options should be exhausted prior to the removal of trees.
- 4.3 Major trees removed as a result of development or other property improvement shall be replaced by specimen trees on a minimum one-for-one basis.

Development of the proposed project would result in the removal of all mature trees on site and the construction of three-story structures that may obstruct scenic mountain views to the north of the main project site. The proposed project would alter mountain views that are currently available to the north across the main project site. Mountain views would be most impacted at the State Street/Hitchcock Way

⁷ City of Santa Barbara, *General Plan*, “Conservation Element,” amended July 1994, 47-49.

intersection. Therefore the proposed project is potentially inconsistent with Visual Resources Policy 3.0. Although impacted, mountain views would be generally similar to those currently available due to the proposed removal of existing mature vegetation on site that currently impedes mountain views. As such, consistency with Policy 3.0 becomes more subjective, as buildings, rather than existing vegetation, would partially obstruct mountain views. Removal of all existing trees from the main project site is inconsistent with Visual Resources Policy 4.0 and Implementation Strategies 4.1 and 4.2. The proposed project would provide replacement street trees and new landscaping trees on the main project site, and the landscape plan calls for the replanting of the mature trees on-site as feasible, which would be potentially consistent with Implementation Strategy 4.3. However, the proposed landscape plan includes few large or skyline trees; and does not identify locations for the replanting of existing mature trees, thereby potentially changing the character of the site significantly. Mitigation measures have been identified to ensure the project is consistent with Implementation Strategy 4.3 by requiring replacement trees, including relocation of existing skyline trees on site. With incorporation of the mitigation related to tree replacement, the proposed project could be found potentially consistent with the visual resources policies of the conservation element.

The impacts of the applicant's alternative would be generally similar to those of the proposed project; however, the degree to which mountain views would be altered could be considered slightly reduced when compared to the proposed project. The removal of all existing trees would be inconsistent with Visual Resources Policy 4.0 and Implementation Strategies 4.1 and 4.2. The applicant's alternative would provide replacement street trees and new landscaping trees on the main project site potentially consistent with implementation strategy 4.3. However, the proposed landscape plan includes few large or skyline trees and does not identify locations for the replanting of existing mature trees, thereby potentially changing the character of the site significantly. Mitigation measures have been identified to ensure the project is consistent with Implementation Strategy 4.3 by requiring replacement trees, including relocation of existing skyline trees on site. With incorporation of the mitigation related to tree replacement, the applicant's alternative could be found potentially consistent with the visual resources policies of the Conservation Element.

Air Quality

The Air Quality section of the Conservation Element addresses factors affecting air quality, jurisdiction, standards, pollutants, local air quality, the relationship between air quality and vehicle use, and strategies to improve air quality.⁸

⁸ City of Santa Barbara, *General Plan, "Conservation Element,"* amended July 1994.

The proposed project and applicant's alternative would require the demolition of existing structures within the project site and the construction of new commercial and residential uses. Air quality impacts could potentially occur during the demolition and construction of the proposed project, but were judged to be less than significant after the completion of the construction phase. Identified mitigation measures would reduce construction-related air quality impacts to a less than significant level. Both the proposed project and applicant's alternative would be consistent with the general plan policies related to air quality.

Biological Resources

The Biological Resources section of the Conservation Element focuses on concerns raised by the "conflict between urban use and ecosystem preservation," including urban encroachment on ecologically sensitive resources and degradation of resources.⁹ The section broadly addresses native terrestrial resources, estuarine and marine resources, intertidal and near shore habitats, fisheries, the Goleta Slough, agricultural resources, and other urban biotic resources.

The proposed project site does not contain, nor is it adjacent to, any sensitive biological resources. The City's Initial Study concluded that no impacts to biological resources would occur. The proposed project and applicant's alternative would be consistent with Conservation Element policies related to biological resources.

Drainage and Flood Control

The Drainage and Flood Control section of the Conservation Element broadly describes the character of the flood hazards that exist in the City. Major creeks and other flood hazards are outlined therein.¹⁰

The project site is not located in a 100-year floodplain, and the City's Initial Study concluded that impacts related to drainage and flood control would be less than significant with identified mitigation measures. The proposed project and applicant's alternative would be consistent with Conservation Element policies related to drainage and flood control.

Water Resources

The Water Resources section of the Conservation Element addresses both the physical water delivery infrastructure as well as water supply issues.¹¹ The section covers supply-demand relationships and water quality.

⁹ City of Santa Barbara, General Plan, "Conservation Element," amended July 1994. ~~Ibid.~~

¹⁰ Ibid.

Both the proposed project and applicant's alternative incorporate water conservation features and devices into their respective project designs in order to minimize future increases in water demand. The City's Initial Study concluded that impacts related to water resources would be less than significant. The proposed project and applicant's alternative would be consistent with the Conservation Element policies related to water resources.

Housing Element

The 2004 Housing Element includes an inventory of available housing; an assessment of housing needs based on local and regional population and employment trends; and identification of goals, objectives, and policies used to create a housing program for the City.¹² The City's Housing Element is based on housing unit construction goals set by the State Department of Housing and Community Development and allocated to cities by regional planning agencies such as the Santa Barbara County Association of Governments (SBCAG).

Local jurisdictions are required by state law to plan for their fair share of projected housing construction needs in their region, as defined in the Regional Housing Needs Assessment (RHNA) prepared by the SBCAG.¹³ The City of Santa Barbara's fair share for the years 2007–2014 has been established by SBCAG at 4,388 units. The RHNA target number is broken down into four income categories: Very Low Income, Low Income, Moderate Income, and Above Moderate Income. The state requires all local jurisdictions to demonstrate the ability to accommodate, or plan for, the RHNA allocation.

Either the proposed project or the applicant's alternative, as provided in the residential condominium portion, would add 73 housing units, including 11 "affordable" units to the City's housing stock. The proposed hotel and offices would not create net new employment opportunities, as the commercial development would replace existing commercial development. Therefore, neither the proposed project nor the applicant's alternative would be expected to generate a significant increase in housing demand within the City. The City's Initial Study concluded that impacts related to housing and population would be less than significant. The proposed project and applicant's alternative would be consistent with the general plan policies related to housing.

¹¹ City of Santa Barbara, *General Plan*, "Conservation Element," amended July 1994, 57.

¹² *Ibid*, "Housing Element," adopted February 2004.

¹³ Santa Barbara County Association of Governments, *Final Regional Housing Needs Assessment*, June 19, 2008.

Noise Element

The purpose of the Noise Element of the general plan is to limit the exposure of the community to excess noise.¹⁴ It addresses major mobile and stationary noise sources; existing and projected levels of noise and contours of major noise sources; existing and projected land uses and the locational relationship to existing and projected noise sources; existing and proposed sensitive receptors; the extent of noise problems in the community; methods of noise attenuation and protection of sensitive receptors; and implementation measures and possible solutions to address existing and foreseeable noise problems.

The City's Initial Study concluded that impacts related to noise would be less than significant with implementation of mitigation measures to address short- and long-term noise impacts. For both the proposed project and applicant's alternative, mitigation measures would address potentially significant temporary construction noise impacts to adjacent residents, and potentially significant long-term noise impacts associated with interior noise levels for future hotels guests, office tenants, and residents of the residential condominium units located adjacent to State Street. Because mitigation measures can reduce potential noise levels to within the Noise Element guidelines of 60 dB(A) exterior/45 dB(A) interior for residential uses and 70 dB(A) exterior/45 dB(A) interior for the commercial use, the proposed project and applicant's alternative would be consistent with the general plan policies related to noise.

Seismic Safety-Safety Element

The Seismic Safety-Safety Element is concerned with seismic and geologic hazards and public-safety-related hazards such as fire, flood, seacliff retreat, and dam safety.¹⁵ The element broadly identifies seismic safety hazards and strategies for the reduction of potential hazards through land use planning and other mitigations. The goals of the Seismic Safety-Safety Element provide a link between the identified problems and issues and the policies and implementation measures. They provide basic guidelines for City decisions related to natural hazards and assets as they affect land use planning and development standards.

The City's Initial Study concluded that impacts related to seismic and geologic hazards and public-safety-related hazards would be less than significant. The proposed project and applicant's alternative would be consistent with the general plan policies related to seismic safety.

¹⁴ City of Santa Barbara, *General Plan*, "Noise Element," amended November 1983.

¹⁵ *Ibid*, "Seismic-Safety/Safety Element," adopted August 1979.

Consistency Analysis

Proposed Project

The proposed project would be generally consistent with the applicable policies of all elements of the general plan. However, the project could be potentially inconsistent with Visual Resources policies related to mountain views and tree removal. Mitigation measures have been included in the EIR to address impacts associated with tree removal, and impacts associated with loss of mountain views are considered less than significant. Therefore, with implementation of the required mitigation, the proposed project could be found potentially consistent with these Visual Resources policies.

Applicant's Alternative

The applicant's alternative would be generally consistent with the applicable policies of all elements of the general plan. However, the applicant's alternative could be potentially inconsistent with Visual Resources policies related to mountain views and tree removal. Mitigation measures have been included in the EIR to address impacts associated with tree removal, and impacts associated with loss of mountain views are considered less than significant. Therefore, with implementation of the required mitigation, the ~~proposed project~~ applicant's alternative could be found potentially consistent with these Visual Resources policies.

5.5.3 Zoning Ordinance

The City's Municipal Code contains the Zoning Ordinance, which defines the zoning designations that apply to the project site as follows:¹⁶

- C-P: Restricted Commercial Zone.**¹⁷ The intent of this zoning designation is to preserve a desirable environment and to protect adjacent residential uses in terms of light, air and existing visual amenities. The Zoning Ordinance enumerates specific types of commercial uses that are permitted in this zone, such as restaurants, banks, grocery stores, and bookstores. Uses permitted in zones R-4, R-O, and C-O zones are also permitted under this designation.
- R-3: Limited Multiple-Family Zone.**¹⁸ This is a restricted residential district intended for high-density multifamily residential uses. The setback requirements and height restrictions for zone R-4 apply to this designation.

¹⁶ City of Santa Barbara, Municipal Code, Title 8, Zoning Ordinance, adopted November 17, 2008.

¹⁷ Ibid, Chapter 28.54, C-P Restricted Commercial Zone, adopted November 17, 2008.

¹⁸ ~~City of Santa Barbara, Municipal Code~~ Ibid, Chapter 28.21, R-3 Limited Multiple-Family Residence Zone and Hotel-Motel-Multiple-Residence Zone, adopted November 17, 2008.

R-4: Hotel-Motel-Multiple Residence Zone.¹⁹ This is a hotel-motel multiple residence district in which the principal use of land is intended to be for multiple housing, but hotels and related uses are permitted. Uses permitted in the R-3 zone are also permitted under this designation.

S-D-2: Special District Zone.²⁰ This zoning designation applies to the Upper State Street area, and provides traffic-related restrictions to development. Specifically, drive-through commercial facilities such as fast food restaurants and banks are prohibited in this area. Building heights are restricted and increased front setbacks are required.

Consistency Analysis

Proposed Project

No changes to the existing zoning are proposed as part of the project. The proposed project includes commercial hotel and residential development, which are uses allowed under the current zoning for the project site. The design of the proposed project complies with all applicable density, height, setback, and parking requirements for the base zone district, as well as the S-D-2 overlay zone. A transfer of existing development rights (TEDR) would be required for the construction of the proposed hotel as planned, and approval of a TEDR is a part of the proposed project's requested discretionary actions. The proposed project would be consistent with the zoning standards contained in the City's Municipal Code.

Applicant's Alternative

No changes to the existing zoning are proposed as part of the project. The applicant's alternative includes commercial office and residential development, which are uses allowed under the current zoning for the project site. The design of the applicant's alternative complies with all applicable density, height, setback, and parking requirements for the base zone district, as well as the S-D-2 overlay zone. No TEDR would be required for the commercial office portion of the applicant's alternative, because the total non-residential square footage would be less than that of the existing hotel.

5.5.4 Upper State Street Study

The project site is located in the Upper State Street Study area. A more detailed discussion and analysis of the proposed project's and the applicant's alternative's consistency or inconsistency with the *Upper State Street Study* (USSS) is provided in **Appendix 5.0**. Summary direction from the USSS that is applicable to the proposed project and the applicant's alternative includes:

¹⁹ City of Santa Barbara, Municipal Code^{ibid}, Chapter 28.21, R-3 Limited Multiple-Family Residence Zone and Hotel-Motel-Multiple-Residence Zone.

²⁰ Ibid, Chapter 28.45.008, S-D-2 Zone Designation.

- Urban Design: Maintain and enhance the character of Upper State Street, including the public streetscape, open space, creeks, views, site design, and building aesthetics.
 - Corridor Identity and Character: Preserve and enhance the character of Upper State Street and its subareas and neighborhoods.
 - Public Streetscape: Improve the public streetscape and adjacent pedestrian connections.
 - Mountain Views: Maintain the backdrop of panoramic mountain views that contributes to the area's sense of place by protecting or establishing intermittent and recurring mountain view corridors and viewing locations on a block-by-block basis.
 - Open Space: Maintain, enhance, and create open space where feasible.
 - Building Setbacks: Reaffirm the existing S-D-2 zone building setback requirements, and provide clarifications for their application.
 - Building Size: Encourage variation of building sizes, and require the height, bulk, mass and scale of buildings to be compatible within the context of respective blocks and subareas, proportional to parcel size, and consistent with the *Upper State Street Area Design Guidelines*, as amended.
- Transportation: Improve traffic, circulation, pedestrian and bicycle connectivity, and parking.
 - Traffic Signal/Intersection Level of Service Improvements: Maintain or improve vehicle traffic flow and intersection service levels along Upper State Street.
 - Mid-Block Congestion and Safety Improvements: Reduce access points to Upper State Street that conflict with through travel.
 - Pedestrian/Bicycle Facility Improvements: Improve pedestrian and bicycle facilities within the corridor, and increase connectivity between parcels, and between the commercial corridor and surrounding neighborhoods.
 - Transit Facility Improvements: Improve transit facilities and service, and encourage increased ridership.
 - Parking Improvements: Develop parking policies and management strategies that help reduce Upper State Street congestion.
- Longer-Term Future: Preserve longer-range future improvement opportunities.

Consistency Analysis

Proposed Project

The proposed project can be found generally consistent with most of the direction and improvement measures identified in the USSS. Certain policies require additional direction from the City, and analysis cannot be concluded until the City adopts formal guidelines. Other policies provide somewhat conflicting direction to the project (such as opening up views of the mountains versus retention of mature trees), and conflicting implementation strategies must be weighed against one another in the ultimate analysis of the project. Additionally, the proposed project would conflict with some of the implementation measures provided in the USSS. Specifically, the proposed hotel structure would reduce mountain views to the

north at the intersection of State Street and Hitchcock Way. The proposed project would conflict with the driveway spacing guidelines, and would reduce (rather than extend) the raised median in State Street to improve access to the residential parking garage.

Applicant's Alternative

The applicant's alternative can be found generally consistent with most of the direction and improvement measures identified in the USSS, some of which to a higher degree than the proposed project. Certain policies require additional direction from the City, and analysis cannot be concluded until the City adopts formal guidelines. Other policies provide somewhat conflicting direction to the project (again, such as opening up views of the mountains versus retention of mature trees), and conflicting implementation strategies must be weighed against one another in the ultimate analysis of the project. Additionally, the applicant's alternative would conflict with some of the implementation measures provided in the USSS. Specifically, the applicant's alternative would conflict with the driveway spacing guidelines, and would reduce (rather than extend) the raised median in State Street to improve access to the residential parking garage. The applicant's alternative would be more consistent with policies regarding view protection and maintaining views at intersections than the proposed project.

5.6 CONCLUSION

Both the proposed project and the applicant's alternative would be consistent with most of the policies of the general plan and the USSS; however, there are specific inconsistencies related to visual resources and circulation that have been identified. Both projects would be consistent with current zoning as defined in the City's Municipal Code. Broad consistency with City policies is often considered adequate for project approval, but such decisions are at the City's discretion. Mitigation measures recommended in this EIR would make the project more consistent with policies related to visual resources and circulation.

6.0 AIR QUALITY

6.1 INTRODUCTION

The project site is located within the City of Santa Barbara, which is part of the South Central Coast Air Basin (basin) and is under the jurisdiction of the Santa Barbara County Air Pollution Control District (SBCAPCD). The air quality assessment for the project includes estimating emissions associated with construction and analysis of greenhouse gases of the project. **Appendix 6.0** includes detailed information on these analyses.

6.2 REGULATORY FRAMEWORK

6.2.1 Federal and State Regulations

The US Environmental Protection Agency (US EPA) established national ambient air quality standards (NAAQS). The NAAQS were established for six major pollutants, termed “criteria” pollutants. The state began to set California ambient air quality standards (CAAQS) in 1969 under the mandate of the Mulford-Carrell Act. The CAAQS are generally more stringent than the NAAQS. The US EPA has designated the Santa Barbara County Association of Governments (SBCAG) as the Metropolitan Planning Organization (MPO) responsible for ensuring compliance with the requirements of the federal Clean Air Act (CAA) for the basin. Both the State of California (state) and the federal government use these six “criteria pollutants” as indicators of air quality and have established for each of them a maximum concentration above which adverse effects on human health may occur. These threshold concentrations are called Ambient Air Quality Standards (AAQS). As shown in **Table 6.0-1, Ambient Air Quality Standards**, these pollutants include ozone (O₃); carbon monoxide (CO); nitrogen dioxide (NO₂); sulfur dioxide (SO₂); two categories of particulate matter: coarse particulate matter with a diameter of 10 microns or less (PM₁₀) and fine particulate matter less than 2.5 microns in diameter (PM_{2.5}); and lead. In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

**Table 6.0-1
Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards ¹		Federal Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O ₃)	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.075 ppm (147 µg/m ³)		
Respirable Particulate Matter (PM ₁₀)	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		—		
Fine Particulate Matter (PM _{2.5})	24 Hour	No Separate State Standard		35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	15.0 µg/m ³		
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m ³)	None	Non- Dispersive Infrared Photometry (NDIR)
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—		
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Gas Phase Chemi- luminescence	0.053 ppm (100 µg/m ³)	Same as Primary Standard	Gas Phase Chemi- luminescence
	1 Hour	0.18 ppm (339 µg/m ³)		—		
Sulfur Dioxide (SO ₂)	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	0.030 ppm (80 µg/m ³)	—	Spectro- photometry (Pararosaniline Method)
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (365 µg/m ³)	—	
	3 Hour	—		—	0.5 ppm (1,300 µg/m ³)	
	1 Hour	0.25 ppm (655 µg/m ³)		—	—	
Lead ⁸	30 Day Average	1.5 µg/m ³	Atomic Absorption	—	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m ³		
	Rolling 3-Month Average ⁹	—		0.15 µg/m ³		

Pollutant	Averaging Time	California Standards ¹		Federal Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer—visibility of 10 miles or more (0.07-30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		No Federal Standards		
Sulfates	24 Hour	25 µg/m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ⁸	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

Source: California Air Resources Board, November 2008.

Footnotes:

- ¹ California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter—PM₁₀, PM_{2.5}, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- ² National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact US EPA for further clarification and current federal policies.
- ³ Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- ⁴ Any equivalent procedure which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
- ⁵ National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- ⁶ National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- ⁷ Reference method as described by the US EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the US EPA.
- ⁸ The ARB has identified lead and vinyl chloride as “toxic air contaminants” with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- ⁹ National lead standard, rolling three-month average: final rule signed October 15, 2008.

In addition to setting out primary and secondary AAQS, the state has established a set of episode criteria for O₃, CO, NO₂, SO₂, and PM₁₀. These criteria refer to episode levels representing periods of short-term exposure to air pollutants that threaten public health. Health effects are progressively more severe as pollutant levels increase from Stage One to Stage Three. **Table 6.0-2, Summary of Health Effects of the Major Criteria Air Pollutants**, lists the health effects of these criteria pollutants and their potential sources. These health effects will not occur unless the standards are exceeded by a large margin or for a prolonged period of time.

**Table 6.0-2
Summary of Health Effects of the Major Criteria Air Pollutants**

Pollutants	Sources	Primary Effects
Ozone (O ₃)	Atmospheric reaction of organic gases with nitrogen oxides in the presence of sunlight.	Aggravation of respiratory and cardiovascular diseases. Irritation of eyes. Impairment of cardiopulmonary function. Plant leaf injury.
Nitrogen Dioxide (NO ₂)	Motor vehicle exhaust. High temperature stationary combustion. Atmospheric reactions.	Aggravation of respiratory illness. Reduced visibility. Reduced plant growth. Formation of acid rain.
Carbon Monoxide (CO)	Byproducts from incomplete combustion of fuels and other carbon containing substances, such as motor exhaust. Natural events, such as decomposition of organic matter.	Reduced tolerance for exercise. Impairment of mental function. Impairment of fetal development. Death at high levels of exposure. Aggravation of some heart diseases (angina).
Suspended Particulate Matter (PM _{2.5} and PM ₁₀)	Stationary combustion of solid fuels. Construction activities. Industrial processes. Atmospheric chemical reactions.	Reduced lung function. Aggravation of the effects of gaseous pollutants. Aggravation of respiratory and cardiorespiratory diseases. Increased cough and chest discomfort. Soiling. Reduced visibility.
Sulfur Dioxide (SO ₂)	Combustion of sulfur-containing fossil fuels. Smelting of sulfur-bearing metal ores. Industrial processes.	Aggravation of respiratory diseases (asthma, emphysema). Reduced lung function. Irritation of eyes. Reduced visibility. Plant injury. Deterioration of metals, textiles, leather, finishes, coatings, etc.
Lead	Contaminated soil (e.g., from leaded fuels and lead based paints).	Impairment of blood functions and nerve construction. Behavioral and hearing problems in children.

Source: California Air Resources Board.

The California Clean Air Act (CCAA) provides the air districts, such as SBCAPCD, with the authority to manage transportation activities at indirect sources. Indirect sources of pollution are generated when minor sources collectively emit a substantial amount of pollution. Examples of this would be the motor vehicles at an intersection, a mall, and on highways. The SBCAPCD also regulates stationary sources of pollution throughout its jurisdictional area. Direct emissions from motor vehicles are regulated by the California Air Resources Board (CARB).

6.2.2 Regional Air Quality Planning Framework

The 1976 Lewis Air Quality Management Act established the SBCAPCD and other air districts throughout the state. The federal CAA Amendments of 1977 required that each state adopt an implementation plan outlining pollution control measures to attain the federal standards in nonattainment areas of the state. The CCAA, adopted in 1988, requires that all Air Pollution Control Districts (APCDs) and Air Quality Management Districts (AQMDs) adopt and enforce regulations to achieve and maintain the state ambient air quality standards for the area under its jurisdiction. The CCAA requires nonattainment districts to develop and adopt an Air Quality Management Plan (AQMP) or Clean Air Plan (CAP), which forms the basis for the State Implementation Plan (SIP). The AQMP/CAP must include emission reduction strategies and control measures sufficient to demonstrate that California air quality standards will be attained by the “earliest practicable date.” As a demonstration of progress toward attainment, the CCAA requires that emissions of nonattainment pollutants be reduced by at least 5 percent per year (compared to 1987 emission levels) until the standards are achieved. The CCAA identifies transportation control measures as an essential element of the SIP.

Regional Clean Air Plan

The SBCAPCD and the SBCAG are responsible for formulating and implementing the CAP for the basin, which includes the City of Santa Barbara. Every three years the SBCAPCD prepares a new CAP, updating the previous plan and having a 20-year horizon. Compliance with the provisions of the CAA and the CCAA is the primary focus of the CAP developed by the SBCAPCD and the SBCAG.

The 2001 CAP was prepared to formally request the US EPA to redesignate Santa Barbara County as an attainment area for the federal 1-hour ozone standard. The Final 2001 Clean Air Plan was adopted by the SBCAPCD Board of Directors on November 15, 2001. As of August 8, 2003, the US EPA approved this redesignation. The US EPA also approved the 1-hour maintenance plan and motor vehicle emissions budgets in the 2001 CAP as revisions to the Santa Barbara portion of the SIP. The County continues to violate the state 1-hour standard for ozone and the state standard for PM₁₀. To coordinate all applicable state and federal planning requirements, the 2001 Plan integrates the technical and policy issues associated with both the state and federal 1-hour ozone standards. The 2001 CAP satisfies federal planning requirements.

The SBCAPCD adopted the ~~2004~~ 2007 CAP in ~~December 2004~~ August 2007, and it has been approved by CARB as the comprehensive SIP component for the region. The 2007 CAP is currently going through the federal approval process. ~~While the SBCAPCD has adopted its 2007 CAP, it has not been approved by CARB or the US EPA. Therefore, the 2004 CAP is the “applicable regional plan” in terms of CEQA~~

~~requirements for assessing plan consistency.~~ The 2001 CAP has been approved by both CARB and the US EPA and remains in effect for federal standards.

The purpose of the 2004 CAP is to address CCAA mandates under Health and Safety Code Sections 40924 and 40925 that require that every three years areas update their clean air plans to attain the state 1-hour ozone standard. The 2004 CAP provides a three-year update to the SBCAPCD's 2001 Clean Air Plan (2001 CAP). Other key requirements of the CCAA addressed in the 2004 CAP include demonstration of an annual 5 percent emission reduction of ozone precursors, or, if this cannot be done, inclusion of every feasible measure as part of the emission controls strategy. State law also requires the 2004 CAP to provide for attainment of the state ambient air quality standards at the earliest practicable date.¹ The 2004 CAP continues the overall strategy for control of both ROC and NO_x emissions adopted in the 2001 CAP with the addition of eight new or revised stationary source control measures, and updated transportation control measures.

6.3 EXISTING SETTING

6.3.1 Project and Surrounding Air Quality

The project site currently has hotel and restaurant uses that include both mobile (vehicles) and stationary sources emitting criteria pollutants.

The SBCAPCD, together with CARB, maintains and operates air monitoring stations in the County. The nearest monitoring station to the project is located in the City of Santa Barbara at 700 East Canon Perdido Street, approximately 3.2 miles to the southeast of the project site. This station monitors ambient concentrations of CO, O₃, PM₁₀, PM_{2.5}, and NO₂. The nearest station that monitors SO₂ is the Goleta-Fairview Station located at 380 N. Fairview Avenue, approximately 5 miles to the west of the project site. **Table 6.0-3, Ambient Air Quality at Monitoring Station in Project Vicinity**, lists the ambient pollutant concentrations registered and the exceedances of state and federal standards that have occurred at the abovementioned monitoring stations from 2005 through 2007, the three most recent years for which data are available. As shown, the monitoring station has registered values above state standards for O₃ and PM₁₀. Values for lead and sulfate are not presented in the table because ambient concentrations are well below the standards. Hydrogen sulfide, vinyl chloride, and visibility-reducing particles were not monitored by CARB or the SBCAPCD during the period of 2005 to 2007. Hydrogen sulfide, sulfates, vinyl chloride, and visibility reducing particles are not applicable to the proposed uses on the project site. Generally, the sources for hydrogen sulfide emissions include decomposition of human and animal wastes and industrial activities, such as food processing, coke ovens, kraft paper mills, tanneries, and

¹ California Health and Safety Code Section 40910

petroleum refineries. Similarly, the sources for vinyl chloride emissions include manufacturing of plastic products, hazardous waste sites, and landfills. As a result, there is no need for any further evaluation of the hydrogen sulfide or vinyl chloride emissions.

**Table 6.0-3
Ambient Air Quality at Monitoring Station in Project Vicinity**

Pollutant	Standard	2005	2006	2007
Carbon Monoxide				
Maximum 1-hour concentration (ppm)		4.0	4.1	3.5
Number of days exceeded	State: > 20 ppm	0	0	0
	Federal: >35 ppm	0	0	0
Maximum 8-hour concentration (ppm)		1.66	1.81	1.38
Number of days exceeded	State: > 9.0 ppm	0	0	0
	Federal: > 9 ppm	0	0	0
Ozone (O₃)				
Maximum 1-hour concentration (ppm)		0.077	0.075	0.079
Number of days exceeded	State: > 0.09 ppm	0	0	0
Maximum 8-hour concentration (ppm)		0.064	0.062	0.071
Number of days exceeded	State: > 0.070 ppm	0	0	1
	Federal: > 0.075 ppm	0	0	0
Coarse Particulates (PM₁₀)				
Maximum 24-hour concentration (µg/m ³)		58.8	107.7	399.7
Estimated number of days exceeded	State: > 50 µg/m ³	1.1	12.7	26.7
	Federal: > 150 µg/m ³	0	0	6.1
Annual arithmetic average concentration (µg/m ³)		27.8	29.6	33.9
Exceeded for year	State: > 20 µg/m ³	Yes	Yes	Yes
Fine Particulates (PM_{2.5})				
Maximum 24-hr concentration (µg/m ³)		28.3	27.9	23.5
Number of days exceeded	Federal: > 35 µg/m ³	0	0	0
Annual arithmetic average concentration (µg/m ³)		10.6	10.1	9.5
Exceeded for year	State: > 12 µg/m ³	0	0	0
	Federal: > 15.0 µg/m ³	0	0	0
Nitrogen Dioxide				
Maximum 1-hr concentration (ppm)		0.062	0.063	0.065
Number of days exceeded	State: > 0.18 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.012	0.011	0.014
Exceeded for year	Federal: > 0.053 ppm	No	No	No

Pollutant	Standard	2005	2006	2007
Sulfur Dioxide				
Maximum 1-hr concentration (ppm)		0.006	0.008	0.003
Number of days exceeded	State: > 0.25 ppm	0	0	0
Maximum 3-hr concentration (ppm)		0.003	0.004	0.002
Number of days exceeded	Federal: > 0.5 ppm	0	0	0
Maximum 24-hr concentration (ppm)		0.002	0.003	0.002
Number of days exceeded	State: > 0.04 ppm	0	0	0
	Federal: > 0.14 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.001	0.001	0.001
Exceeded for year	Federal: > 0.030 ppm	No	No	No

Source: SBCAPCD, CARB, and US EPA.

ppm = parts per million

$\mu\text{g}/\text{m}^3$ = microgram of pollutant per cubic meter of air

6.3.2 Regional Air Quality

Air quality in Santa Barbara County has undergone a gradual improvement over many years, with 1999 being one of the cleanest years on record. Air quality has improved to the point that the air is clean enough to meet the federal 1-hour ozone standard for the first time since the standard was instituted. The number of days on which the air was declared unhealthy in Santa Barbara County has been reduced by over 80 percent from 1990 to 2000 despite substantial increases in population and vehicle miles traveled.

6.3.3 Climate/Meteorology

Air quality in the planning area is not only affected by various emission sources (mobile, industry, etc.) but is also affected by atmospheric conditions such as wind speed, wind direction, temperature, and rainfall. The climate of Santa Barbara County can be characterized as Mediterranean, with warm, dry summers and cooler, damp winters. Along the coast, mild temperatures are the rule throughout the year due to the moderating influence of the Pacific Ocean.

The climatological station closest to the site is the Santa Barbara Station (station located near the intersection of East Islay Street and Anacapa Street in downtown Santa Barbara). The monthly average maximum temperature recorded at this station from 1927 to 2003 ranged from 65.2°F to 77.5°F, with an annual average maximum of 71.1°F. The monthly average minimum temperature recorded at this station ranged from 42.6°F to 58.2°F, with an annual average minimum of 50.3°F. Regional meteorology is largely dominated by a persistent high-pressure area that commonly resides over the eastern Pacific Ocean. The Pacific High remains generally fixed several hundred miles offshore from May through September, enhancing onshore winds and opposing offshore winds.

From November through April, the Pacific High tends to migrate south, allowing northern storms to move across the county. About 90 percent of the total annual rainfall is received during this period. Winter conditions are usually mild, with intermittent periods of precipitation followed by mostly clear days. Rainfall amounts can vary considerably around the county. The Santa Barbara Station recorded average monthly rainfall from 1927 to 2003 as much as 4.04 inches in February to 0.47 inch or less between May and October, with an annual average total of 17.62 inches. Patterns in monthly and yearly rainfall totals are unpredictable due to fluctuations in the weather.

Airflow around the county plays an important role in the movement and dispersion of pollutants. In spring and summer, when the Pacific High attains its greatest strength, onshore winds from the northwest generally prevail during the day. At night, as the sea breeze dies, weak drainage winds flow down the coastal mountains and valleys to form a light, easterly land breeze.

In the fall, the diurnal alternation of land-sea breeze circulation can cause pollutants to accumulate over the ocean for a period of one or more days and subsequently be carried back onshore with the return of the sea breeze. Strong inversions can form at this time, trapping pollutants near the surface.

This effect is intensified when the Pacific High weakens or moves inland. This may produce a “Santa Ana” condition, in which air, often pollutant-laden, is transported into the county from the east and southeast. This can occur over a period of several days until the high-pressure system returns to its normal location, breaking the pattern. The onset of the typical daytime sea breeze can bring these pollutants back onshore, where they combine with local emissions to cause high pollutant concentrations. Not all occurrences of the post-Santa Ana condition lead to high ambient pollutant levels, but they do play an important role in the air pollution meteorology of the county.

6.3.4 Air Pollution Constituents and Attainment Status

CARB coordinates and oversees both state and federal air pollution control programs in California, oversees activities of local air quality management agencies, and maintains air quality monitoring stations throughout the state in conjunction with the US EPA and local air districts. CARB has divided the state into 15 air basins based on meteorological and topographical factors of air pollution. Data collected at these stations are used by CARB and the US EPA to classify air basins as attainment, nonattainment, nonattainment-transitional, or unclassified for each criteria pollutant based on air quality data for the most recent three calendar years compared with the AAQS. Nonattainment areas are imposed with additional restrictions as required by the US EPA. The air quality data are also used to monitor progress in attaining air quality standards.

CARB provided the US EPA with California's recommendations for 8-hour ozone area designations on July 15, 2003. The recommendations and supporting data were an update to a report submitted to the EPA in July 2000. As of August 8, 2003, Santa Barbara County has been redesignated as a federal ozone attainment area for 1-hour ozone. The US EPA issued final designations for the 8-hour ozone designations on April 15, 2004. **Table 6.0-4, Attainment Status of Criteria Pollutants (South Central Coast Air Basin – Santa Barbara County)**, lists the attainment status for the criteria pollutants in the basin.

Table 6.0-4
Attainment Status of Criteria Pollutants
(South Central Coast Air Basin – Santa Barbara County)

Pollutant	State	Federal
O ₃ 1-hour	Attainment	Attainment (Standard was revoked)
O ₃ 8-hour	Nonattainment	Attainment
PM ₁₀	Nonattainment	Attainment
PM _{2.5}	Unclassified	Attainment/Unclassified
CO	Attainment	Attainment
NO ₂	Attainment	Attainment
SO ₂	Attainment	Attainment
Lead	Attainment	Attainment
All others	Attainment/Unclassified	Not Applicable

Source: SBCAPCD, Santa Barbara County Air Quality Attainment Designation, <http://www.sbcapcd.org/sbclattainment.htm>, accessed February 18, 2009.

The following are descriptions of the priority pollutants.

Ozone. O₃ (smog) is formed by photochemical reactions between NO_x and VOC rather than being directly emitted. O₃ is a pungent, colorless gas typical of Southern California smog. Elevated O₃ concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, the elderly, and young children. O₃ levels peak during summer and early fall. Santa Barbara County is designated as an attainment area for the state 1-hour O₃ standard and a nonattainment area for the state 8-hour O₃ standard, and is in attainment for the federal 1-hour and 8-hour O₃ standards.

Carbon Monoxide. CO is formed by the incomplete combustion of fossil fuels, almost entirely from automobiles. It is a colorless, odorless gas that can cause dizziness, fatigue, and impairments to central nervous system functions. The entire basin is in attainment with both federal and state CO standards.

Nitrogen Oxides. NO₂, a reddish brown gas, and nitric oxide (NO), a colorless, odorless gas, are formed from fuel combustion under high temperature or pressure. These compounds are referred to as nitrogen oxides, or NO_x. NO_x is a primary component of the photochemical smog reaction. It also contributes to other pollution problems, including a high concentration of fine particulate matter, poor visibility, and acid deposition (i.e., acid rain). NO₂ decreases lung function and may reduce resistance to infection. The entire basin is in attainment with both federal and state NO₂ standards.

Sulfur Dioxide. SO₂ is a colorless, irritating gas formed primarily from incomplete combustion of fuels containing sulfur. Industrial facilities also contribute to gaseous SO₂ levels. SO₂ irritates the respiratory tract, can injure lung tissue when combined with fine particulate matter, and reduces visibility and the level of sunlight. The entire basin is in attainment or unclassified with both federal and state SO₂ standards.

Lead. Lead is found in old paints and coatings, plumbing, and a variety of other materials. Once in the blood stream, lead can cause damage to the brain, nervous system, and other body systems. Children are highly susceptible to the effects of lead. The entire basin is in attainment for the state and federal standards for lead.

Particulate Matter. Particulate matter is the term used for a mixture of solid particles and liquid droplets found in the air. Coarse particles, PM₁₀, derive from a variety of sources, including windblown dust and grinding operations. Fuel combustion and resultant exhaust from power plants and diesel buses and trucks are primarily responsible for fine particle, PM_{2.5}, levels. Fine particles can also be formed in the atmosphere through chemical reactions. PM₁₀ can accumulate in the respiratory system and aggravate health problems such as asthma. The US EPA's scientific review concluded that PM_{2.5}, which penetrates deeply into the lungs, is more likely than PM₁₀ to contribute to the health effects listed in a number of recently published community epidemiological studies at concentrations that extend well below those allowed by the current PM₁₀ standards. These health effects include premature death and increased hospital admissions and emergency room visits (primarily the elderly and individuals with cardiopulmonary disease); increased respiratory symptoms and disease (children and individuals with cardiopulmonary disease such as asthma); decreased lung functions (particularly in children and individuals with asthma); and alterations in lung tissue and structure and in respiratory tract defense mechanisms. The entire basin is attainment for the federal PM₁₀ standard and is in nonattainment for the state PM₁₀ standard. The attainment status of PM_{2.5} in the basin was not officially established by the EPA

or CARB at the time this analysis was prepared. However, based on the monitored data, the basin is likely to be designated as a nonattainment area for PM_{2.5}.

6.4 PROJECT FEATURES

The proposed project consists of a 106-room hotel and 73 residential condominium units. The hotel building would be 62,298 square feet, including 19,834 square feet of non-room area (i.e., meeting rooms, corridors, lobby, laundry area, etc.), above a 46,701-square-foot parking garage. The proposed residential development would total 93,719 square feet above a 129,100-square-foot parking garage. The proposed project would also include open space and a plaza that would provide physical separation between the hotel and condominiums and landscaping along State Street. The hotel and residential condominium development would be on separate parcels.

The applicant's alternative consists of 14,254 square feet of office space and 73 residential condominium units. The office buildings would be 5,803 and 8,791 square feet. The proposed residential development would total 93,797 square feet above a 131,400-square-foot parking garage. The applicant's alternative would also include open space and plaza areas that would provide physical separation between the office and condominiums, and between the development and State Street. The office and residential condominium development would be on separate parcels.

6.5 IMPACT SIGNIFICANCE GUIDELINES

6.5.1 Impact Evaluation Guidelines

A project would result in a significant air quality impact if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Exceed any City air quality emission threshold: Long-term;
- Exceed any City air quality emission threshold: Short-term.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated in non-attainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutants; or
- Create objectionable odors affecting a substantial number of people.

6.5.2 Thresholds of Impact Significance

A project would normally be considered to have a significant effect on air quality if it would violate any AAQS, contribute substantially to an existing air quality violation, expose sensitive receptors to substantial pollutants concentrations, or conflict with adopted environmental plans and goals of the community in which it is located.

In addition to the federal and state AAQS, there are emissions thresholds for operation of a proposed project in the basin. The City of Santa Barbara utilizes the quantitative and qualitative thresholds developed by the SBCAPCD for evaluating the air quality impacts of projects. The SBCAPCD originally adopted impact thresholds of significance for air quality in October 1995. The most recent revisions to the thresholds are contained in the SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents*.²

Construction Emissions Thresholds

Construction of the project will be assessed in accordance with the impact thresholds of significance for construction. While the SBCAPCD does not have quantitative thresholds for short-term or construction emissions, the SBCAPCD uses the following guidelines for determining the significance of construction impacts. Construction of a project would result in a less than significant impact on air quality if the project would:

- Result in reactive organic compounds (ROC) emissions of less than 25 tons per year, or
- Result in nitrogen oxide (NO_x) emissions of less than 25 tons per year.

The SBCAPCD and City have policies to reduce dust and particulate matter emissions and construction equipment emissions to the extent feasible to minimize the incremental contribution of construction emissions to cumulative air pollution. SBCAPCD Rule 202.D.16 specifies that if the combined emissions from all construction equipment used to construct a stationary source which requires an Authority to Construct (ATC) have the potential to emit more than 25 tons per year of ROC, NO_x, SO_x, or PM₁₀, offsets shall be provided under the provisions of Rule 804. SBCAPCD Rule 302 requires that fugitive dust be controlled so that the presence of such dust is not darker than No. 1 on the Ringelmann Chart (as published by the United States Bureau of Mines). In addition, SBCAPCD Rule 303 requires implementation of techniques to prevent fugitive dust from creating a nuisance.

² Santa Barbara County Air Pollution Control District, *Scope and Content of Air Quality Sections in Environmental Documents*, June 2008.

Toxic Air Contaminant Emission Thresholds

Construction of the project will be assessed with regard to potential health impacts that may occur due to emissions of toxic air contaminants (TACs) during construction. Construction of a project would result in a less than significant impact on air quality if the project would:

- Not exceed the SBCAPCD health risk public notification thresholds adopted by the SBCAPCD Board (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than one [1.0] for non-cancer risk).

Greenhouse Gas Thresholds

The State of California has adopted legislation regulating emissions of greenhouse gases (GHGs). California law (Senate Bill 97, Chapter 185, 2007) states that GHG emissions and the effects of GHG emissions are subject to CEQA. Pursuant to SB 97, the Governor's Office of Planning and Research (OPR) is in the process of developing guidelines for the mitigation of greenhouse gas emissions for the effects of greenhouse gas emissions. As part of this process, OPR has asked the California Air Resources Board (CARB) to recommend statewide interim thresholds of significance for greenhouse gases. CARB has released a *Preliminary Draft Staff Proposal* (CARB, October 2008) recommending interim significance thresholds for GHGs under CEQA. The thresholds for residential and commercial projects are based on as yet to be determined performance standards for construction, water use, waste, and transportation sources of GHGs and an energy use performance standard equal to the California Energy Commission's Tier II Energy Efficiency goal. In addition, CARB is recommending that a project, with performance standards or equivalent mitigation, emit no more than a certain level of GHGs per year, to be determined.

OPR issued its *Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions* on January 8, 2009. The preliminary draft amendments do not identify thresholds of significance nor do they prescribe assessment methodologies or specific mitigation measures. Rather, the amendments are consistent with the existing CEQA framework allowing lead agencies discretion in making determinations based on substantial evidence. OPR has requested that CARB recommend a statewide method for setting thresholds of significance that lead agencies may adopt.

Since CARB does not have not specific numerical thresholds for GHGs and neither the City of Santa Barbara nor the SBCAPCD have adopted significance thresholds for impacts related to GHGs and global climate change, it is difficult to determine impacts under CEQA. While direct GHG emissions can be calculated, the emissions cannot be precisely correlated with specific impacts based on currently available science and climate change prediction models. Climate change is a global phenomenon and scientific tools do not exist to determine impacts from a single project. The California Global Warming Solutions

Act of 2006 (Assembly Bill [AB] 32) created a framework for the reduction of GHGs in California; however, it did not specifically address the role of CEQA in achieving the goals of the Act. AB 32 requires CARB to adopt a scoping plan by January 2009 indicating how reductions in significant GHG sources will be achieved through regulations, market mechanisms, and other actions. On December 11, 2008, the CARB Governing Board passed a resolution that initiated steps toward the final approval of the *Climate Change Proposed Scoping Plan*³ required by AB 32. Therefore, in the absence of an established significance threshold for GHGs, the impact of the project with respect to GHG emissions and global climate change will be analyzed based on whether or not the project would:

- be consistent with the emissions reduction targets and strategies prescribed in CARB's *Climate Change Proposed Scoping Plan* (CARB, updated December 2008); and
- meet the City's sustainability and energy efficiency goals (see **Section 10.0**).

6.6 METHODOLOGY

The SBCAPCD has established guidelines and requirements to conduct air quality analyses. The SBCAPCD *Guidelines for the Implementation of the California Environmental Quality Act of 1970* were followed in the assessment of air quality impacts for the project.⁴ These methodologies are referenced and updated in SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents*.⁵

Air quality impacts are predicted by characterizing project-related emission sources involved with construction and demolition. To characterize emission sources, project-specific information was used wherever available. When project-specific data were not available, representative data supplied by local, state, and federal agencies were used. These emission rates are compared with thresholds and district clean air plans to determine if there will be a significant impact on air quality.

Modeling tools are used to translate these emission rates into pollutant concentrations at specific sensitive locations. These concentrations are compared to standards and thresholds to determine the potential for impacts on the health of individuals at those sensitive locations. **Appendix 6.0** contains detailed information on these analyses.

Short-term impacts include construction-related emissions both from vehicular exhaust and activities that generate fugitive dust. The analysis of short-term impacts also includes a diesel toxics analysis similar to the long-term analysis. The net increase in pollutant emissions determines the significance and impact on

³ California Air Resources Board, *Climate Change Proposed Scoping Plan*, updated December 2008.

⁴ Santa Barbara County Air Pollution Control District, *Guidelines for the Implementation of the California Environmental Quality Act of 1970*, revised December 2003.

⁵ *Ibid*, *Scope and Content of Air Quality Sections in Environmental Documents*, June 2008.

regional air quality as a result of the project. The results also allow the local government to determine whether the project is consistent with the local Clean Air Plan and would not deter the region from achieving the goal of reducing pollutants to comply with federal and state AAQS.

The Office of Environmental Health Hazard Assessment (OEHHA) method was used for estimating potential health risks associated with diesel equipment particulates emissions, as described in Appendix I of the *Air Toxics Hot Spots Program Risk Assessment Guidelines*⁶ (OEHHA, August 2003) and detailed in **Appendix 6.0** of this EIR, "Diesel Exhaust Particulate Screening Health Risk Assessment."

6.7 IMPACTS

The environmental impact analysis presented below is based on determinations made in the Notice of Preparation (NOP) for issues that were determined to be potentially significant, or for issues identified by reviewing agencies, organizations, or individuals commenting on the NOP that made a reasonable argument that the issue was potentially significant (see **Responses to NOP, Appendix 2.0**).

The Initial Study determined that the proposed project would not result in significant impacts for the following thresholds:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Exceed any City air quality emission threshold: Long-term;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated in non-attainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutants; or
- Create objectionable odors affecting a substantial number of people.

A discussion of the potential impacts for these effects that were determined not be significant is provided in **Section 11.0** of this EIR.

The Initial Study determined that the proposed project may result in significant impacts for the following threshold:

- Exceed any City air quality emission threshold: Short-term.

⁶ Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Risk Assessment Guidelines*, August 2003.

6.7.1 Exceed any City air quality emission threshold: Short-term.

Air quality impacts during demolition and construction of the project result from demolition and soil disturbance and equipment exhaust. Major sources of air pollutant emissions during demolition, site preparation, grading, and construction include: (1) exhaust emissions from construction vehicles; (2) fugitive dust generated by construction vehicles and equipment traveling over exposed surfaces; (3) demolition activities; and (4) soil disturbances from grading and backfilling. Construction emissions are of particular concern to sensitive receptors.

Demolition, excavation and construction of the proposed project would be phased over approximately 124 weeks (see **Figure 3.0-16**), estimated to start in mid-2009 and continue through the year 2011. The demolition, excavation, and construction of the applicant's alternative would occur over a 104-week period (see **Figure 3.0-16**), estimated to start in mid-2009. This analysis evaluates construction and vehicle exhaust emissions and diesel toxics, fugitive dust and particulate matter associated with site preparation, grading, and construction.

The project (either the proposed project or the applicant's alternative) would include the demolition of 65,500 square feet of existing structures and 135,000 square feet of site clearing. Preliminary earthwork anticipates 80,000 cubic yards of earth to be exported as part of the excavation of the parking structure for the proposed project, or 60,000 cubic yards of earth for the applicant's alternative.

The URBEMIS2007 Environmental Management Software was used to quantify construction emissions generated during each phase of project construction. URBEMIS2007 is a land use and transportation based computer model designed to estimate regional air emissions from new development projects. The model accounts for certain meteorological conditions that characterize specific air basins in California.

A number of variables are input into the model including the construction schedule, the type of construction equipment required to build the project, and emission factors for each piece of equipment. The approximate construction schedule was obtained from the project applicant. The number and types of construction equipment that would operate simultaneously on any given day during each construction phase were also obtained from the project applicant or were based on SCBAPCD accepted default values. Based on data from the applicant, the project would be constructed in five major phases. The details regarding the phases and associated URBEMIS2007 inputs are discussed below.

Phase 1, Hazardous Material Abatement. This phase would begin in mid-2009 and last for approximately five weeks. Emissions during this phase would be limited to worker trips and occasional heavy-duty trucks as needed. URBEMIS2007 does not specifically have a phase dedicated for hazardous material abatement; therefore, adjustments were made to use the building construction phase as a surrogate to

conservatively estimate the emissions. The worker trip factors were adjusted to account for 35 workers that would be used during this phase and an off-road heavy-duty truck was assumed to operate for 8 hours per day.

Phase 2, Demolition. This phase would begin after Phase 1 and would last for approximately nine weeks. Emissions during this phase would occur due to demolition of existing structures, removal of existing asphalt and other foundational materials, and removal of landscaping. Approximately 20 to 28 haul trucks would be used during each workday to remove the demolition debris. Off-road equipment would include an excavator, rubber-tired loader, skid steer loader, and industrial saws. Worker trips would also be a source of emissions during this phase as well as fugitive dust. Three separate demolition phases were used in the URBEMIS2007 to model the impacts associated with (1) demolition of existing structures, (2) removal of existing asphalt and other foundational materials, and (3) removal of landscaping.

Phase 3, Grading and Excavation. This phase would begin after Phase 2 in roughly the fourth quarter of 2009 and would last for approximately 10 weeks for the proposed project, or 8 weeks for the applicant's alternative. Emissions during this phase would occur due to grading and excavation of soil. Approximately 120 haul trucks, at approximately 22 cubic yards capacity, would be used during each workday to export the material. Off-road equipment would include a crane, forklift, excavator, loader, and water truck. Worker trips would also be a source of emissions during this phase as well as fugitive dust.

Phase 4, Underground Construction. This phase would begin near the end of 2009 and would last for approximately 30 weeks for the proposed project, or 24 weeks for the applicant's alternative. Emissions during this phase would occur due to construction of the parking structure. The maximum amount of construction equipment were assumed for this modeling phase. Off-road equipment would include air compressors, a crane, forklift, skid steer loader, industrial saws, cement and mortar mixers, loader, and backhoes. Worker trips and vendor trips would also be a source of emissions during this modeling phase.

Phase 5, Building Construction. The final phase would begin in mid-2010 and would be complete in the fourth quarter of 2011 for the proposed project, or by middle of 2011 for the applicant's alternative. Emissions during this phase would occur due to construction of the hotel or office, and condominium buildings. This phase also includes architectural coating and asphalt paving subphases. Off-road equipment would include a crane, air compressors, forklifts, industrial saws, cement and mortar mixers. Asphalt paving would include the use of cement and mortar mixers, a paver, roller, loader, and other paving equipment. Architectural coating would result in emissions of ROC. Worker trips and vendor trips would also be a source of emissions during this modeling phase.

The emission factors for each type of construction equipment and activity were obtained from CARB's EMFAC2007 model and OFFROAD2007 model, both of which are incorporated as part of the URBEMIS2007 model. The EMFAC2007 model generated emissions factors for on-road mobile sources (e.g., passenger vehicles) and the OFFROAD2007 model generates emission factors for off-road source (e.g., construction equipment). Other emission factors, such as for fugitive dust emissions, are based on SBCAPCD-approved factors, also incorporated into the URBEMIS2007 model. Virtually all of the construction equipment and activities are assumed to operate during the workday between 6 and 8 hours. These operating estimates are conservative (i.e., an overestimate) and are based on surveys conducted on the number of hours construction equipment operate on typical construction sites in a given day. In reality, construction equipment often operates cyclically for only a fraction of each workday.

The emission calculations also assume the use of standard construction practices such as compliance with general SBCAPCD measures to reduce fugitive dust emissions. Compliance with fugitive dust measures is mandatory for all construction projects. In the URBEMIS2007 model, the emission calculations take into account compliance with these measures by incorporating the watering of exposed surfaces and unpaved roads two times daily, which is estimated to reduce fugitive dust emissions (both PM₁₀ and PM_{2.5}) by a maximum of 55 percent. The emission calculations also take into account reducing on site vehicle speeds to 15 miles per hour or less, which is estimated to reduce associated fugitive dust emissions (both PM₁₀ and PM_{2.5}) by a maximum of 44 percent. The SBCAPCD requires other mitigation measures to minimize fugitive dust emissions; however, they are not quantifiable in the URBEMIS2007 model.

Proposed Project Construction Air Quality Impacts

Demolition, Vehicle Exhaust and Dust Impacts

Table 6.0-5, Estimated Project Construction Emissions – Proposed Project, identifies the maximum daily emissions for each pollutant during each year of the proposed project's construction. Construction emissions include all emissions associated with the construction equipment, grading and demolition activities, worker trips, and on-road diesel trucks. The emissions are considered to be conservative; that is, the emissions presented in **Table 6.0-5** likely over predict the actual emissions that would occur during project construction because the use of SBCAPCD default values is known to result in a conservative assessment.

As shown, construction of the project would not exceed the SBCAPCD recommended guidelines for ROC and NO_x emissions of 25 tons per year. Therefore, construction of the project would result in a *less than significant* (Class III) impact. Nonetheless, the project is still required to comply with PM₁₀ (fugitive dust)

and exhaust construction impact mitigation measures, as stated in the SBCAPCD *Scope and Content of Air Quality Sections in Environmental Documents*)⁷, which are also standard conditions of approval for the City. These measures are discussed later in **Section 6.7.2, Construction Mitigation Measures**.

**Table 6.0-5
Estimated Project Construction Emissions – Proposed Project**

Construction Year	Maximum Emissions in Tons per Year					
	ROC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2009	0.31	3.44	1.73	0.00	3.64	0.86
2010	0.29	1.92	3.05	0.00	0.08	0.07
2011	3.87	3.06	3.53	0.00	0.20	0.18
SBCAPCD Guidelines:	25	25	—	—	—	—
Exceeds Guidelines?	NO	NO	—	—	—	—

Source: Impact Sciences, Inc., (2008). Emissions calculations are provided in **Appendix 6.0**.

¹ PM₁₀ and PM_{2.5} fugitive dust emissions reflect required fugitive dust mitigation measures.

Diesel Toxics Impacts

On August 27, 1998, CARB designated diesel particulate matter (DPM) emissions from diesel-fueled engines as a toxic air contaminant (TAC). Construction of the proposed project will result in the operation of diesel-fueled equipment on the project site. Consequently, an increase in the concentrations of DPM and its associated health effects would occur in the vicinity of the project. The SBCAPCD's *Scope and Content of Air Quality Sections in Environmental Documents* include significance thresholds for evaluating the health effects of TACs.⁸ The document recommends (1) a lifetime probability of contracting cancer greater than 10 in 1 million (10×10^{-6}) as a significance threshold for evaluating cancer impacts from TACs and (2) a health Hazard Index of 1 as a significance threshold for evaluating noncarcinogenic effects of TACs.

The OEHHA, CARB, and the US EPA have developed methodologies to evaluate the potential health impacts from TACs. The potential impacts from TACs were assessed using a screening health risk assessment (HRA) in accordance with the methodologies from OEHHA, CARB, and the US EPA. The screening HRA utilized the USEPA-approved SCREEN3 model, which is a dispersion model that

⁷ Santa Barbara County Air Pollution Control District, *Scope and Content of Air Quality Sections in Environmental Documents*, June 2008.

⁸ Ibid.

conservatively estimates pollutant concentrations at downwind receptors using worst-case meteorological conditions.

On-site DPM emissions associated with construction of the proposed project were modeled using SCREEN3. The SCREEN3 model output provides pollutant concentrations for a 1-hour averaging period. It is necessary to adjust the output to reflect annual average concentration for use in a screening HRA. Therefore, the model output was multiplied by a factor of 0.08, as recommended by the US EPA. Based on the screening HRA, the cancer risk due to construction activities would not exceed the SBCAPCD significance threshold, as indicated in **Table 6.0-6, Proposed Project Cancer Risks – Proposed Project**.

**Table 6.0-6
Proposed Project Cancer Risks – Proposed Project**

Receptor Type	Annual Average DPM Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Modeled Cancer Risk (per million)	Threshold (per million)
Residential	0.1590	6.5	10
Worker	0.1810	2.6	10
Student	0.0115	0.7	10

Source: Impact Sciences, Inc., 2008. Please see worksheet in **Appendix 6.0**.

In addition to the potential cancer risk, DPM has chronic (i.e., long-term) noncancer health impacts. The chronic noncancer health impacts are based on the annual average DPM concentration. The chronic noncancer inhalation Hazard Index was calculated by dividing the maximum annual average concentration identified in the screening HRA by the chronic Reference Exposure Level (REL) for DPM. The OEHHA Guidance has recommended an ambient concentration of 5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) as the chronic inhalation REL for DPM. The REL is the concentration at or below which no adverse noncancer health effects are anticipated. No inhalation REL for acute (i.e., short-term) effects has been determined for DPM by OEHHA.

The maximum DPM concentration and chronic Hazard Index at any receptor is shown in **Table 6.0-7, Chronic Hazard Index – Proposed Project**. As shown, the chronic Hazard Index at the most impacted receptor is less than the SBCAPCD significance threshold of 1.0 for non-cancer health impacts.

Based on this screening HRA, construction of the proposed project would not exceed the SBCAPCD significance thresholds for cancer risk and noncancer health impacts. Therefore, the health impacts are *less than significant* (Class III). For additional details regarding the screening health risk assessment, refer to **Appendix 6.0**.

**Table 6.0-7
Chronic Hazard Index – Proposed Project**

Receptor	Maximum Annual Average DPM Concentration ($\mu\text{g}/\text{m}^3$)	Chronic Hazard Index	Threshold
Maximum Impacted	0.1810	0.0362	1

Source: Impact Sciences, Inc., 2008. Please see worksheet in Appendix 6.0.

Applicant's Alternative Air Quality Impacts

Demolition, Vehicle Exhaust and Dust Impacts

The applicant's alternative project consists of the same number of condominium residences; however, the hotel is replaced with an approximately 14,600-square-foot office building. The construction phasing and equipment would be the same as for the proposed project except grading and excavation would last 8 weeks (instead of 10), underground construction would last 24 weeks (instead of 30), and building construction would last 58 weeks (instead of 70 weeks). In addition, less material would be excavated and exported due to reduced underground parking needs.

Table 6.0-8, Estimated Construction Emissions – Applicant's Alternative, identifies the maximum daily emissions for each pollutant during each phase of project construction. Construction emissions include all emissions associated with the construction equipment, grading and demolition activities, worker trips, and on-road diesel trucks. The emissions are considered to be conservative; that is, the emissions presented in **Table 6.0-8** likely overpredict the actual emissions that would occur during project construction because the use of SBCAPCD default values is known to result in a conservative assessment.

**Table 6.0-8
Estimated Construction Emissions – Applicant’s Alternative**

Construction Year	Maximum Emissions in Tons per Year					
	ROC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2009	0.31	3.36	1.78	0.00	3.03	0.73
2010	0.29	1.92	3.05	0.00	0.08	0.07
2011	2.77	1.78	2.06	0.00	0.12	0.10
SBCAPCD Guidelines:	25	25	—	—	—	—
Exceeds Guidelines?	NO	NO	—	—	—	—

Source: Impact Sciences, Inc., 2008. Emissions calculations are provided in *Appendix 6.0*.

¹ PM₁₀ and PM_{2.5} fugitive dust emissions reflect required fugitive dust mitigation measures.

As shown, construction of the ~~project~~ applicant’s alternative would not exceed the SBCAPCD recommended guidelines for ROC and NO_x emissions of 25 tons per year. Therefore, construction of the ~~project~~ applicant’s alternative would result in a *less than significant* (Class III) impact. Nonetheless, the project is still required to comply with PM₁₀ (fugitive dust) and exhaust construction impact mitigation measures, as stated in the SBCAPCD *Scope and Content of Air Quality Sections in Environmental Documents* (SBCAPCD, June 2008), which are standard conditions of approval for the City. These measures are discussed later in **Section 6.7.2, Construction Mitigation Measures**.

Diesel Toxics Impacts

Similar to the proposed project, on-site DPM emissions associated with construction of the alternative project were modeling using SCREEN3. The SCREEN3 model output provides pollutant concentrations for a 1-hour averaging period. It is necessary to adjust the output to reflect annual average concentration for use in a screening HRA. Therefore, the model output was multiplied by a factor of 0.08, as recommended by the US EPA. Based on the screening HRA, the cancer risk due to construction activities would not exceed the SBCAPCD significance threshold, as indicated in **Table 6.0-9, Project Cancer Risks – Applicant’s Alternative**.

The maximum DPM concentration and chronic Hazard Index at any receptor is shown in **Table 6.0-10, Project Chronic Hazard Index – Applicant’s Alternative**. As shown, the chronic Hazard Index at the most impacted receptor is less than the SBCAPCD significance threshold of 1.0 for noncancer health impacts.

Table 6.0-9
Project Cancer Risks – Applicant’s Alternative

Receptor Type	Annual Average DPM Concentration (µg/m³)	Maximum Modeled Cancer Risk (per million)	Threshold (per million)
Residential	0.1220	5.0	10
Worker	0.1390	2.0	10
Student	0.0088	0.5	10

Source: Impact Sciences, Inc., 2008. Please see worksheet in Appendix 6.0.

Table 6.0-10
Project Chronic Hazard Index – Applicant’s Alternative

Receptor	Maximum Annual Average DPM Concentration (µg/m³)	Chronic Hazard Index	Threshold
Maximum Impacted	0.1390	0.0278	1

Source: Impact Sciences, Inc., 2008. Please see worksheet in Appendix 6.0.

Based on this screening HRA, construction of the alternative project would not exceed the SBCAPCD significance thresholds for cancer risk and noncancer health impacts. Therefore, the health impacts are *less than significant* (Class III). For additional details regarding the screening HRA, refer to **Appendix 6.0**.

6.7.2 Construction Mitigation Measures

Construction activities would not generate emissions sufficient to exceed the impact significance guidelines stated herein, and no mitigation measures are required to reduce impacts to a less than significant level. However, the following **Mitigation Measures AQ-1** through **AQ-9** are recommended to be implemented per the CAP and City policy. These Mitigation Measures, from the SBCAPCD *Scope and Content of Air Quality Sections in Environmental Documents*), would reduce fugitive dust emissions.⁹ **Mitigation Measures AQ-10** and **AQ-11** are ozone precursor control measures also from the *Scope and Content of Air Quality Sections in Environmental Documents* and would reduce NO_x emissions from

⁹ Santa Barbara County Air Pollution Control District, *Scope and Content of Air Quality Sections in Environmental Documents*, June 2008.

construction equipment.¹⁰ **Mitigation Measure AQ-12** recognizes that application of architectural coatings needs to occur in compliance with SBCAPCD regulations to minimize air pollutant emissions. These mitigation measures supersede those identified in the Initial Study. All measures would be implemented by the project contractor.

The following mitigation measures shall be implemented for either the proposed project or the applicant's alternative:

AQ-1: Dust Mitigation - Site Watering. During site grading and transportation of fill materials, regular water sprinkling shall occur using reclaimed water whenever the Public Works Director determines that it is reasonably available. Water trucks or sprinkler systems shall be used in the late morning, during clearing, grading, earthmoving or transportation of cut and fill materials, and after work is completed for the day to prevent dust from leaving the project site and to create a crust after each day's activities cease. Reclaimed water shall be used if available. Each day, after construction activities cease, the entire area of disturbed soil shall be sufficiently moistened to create a crust.

Throughout construction, water trucks or sprinkler systems shall also be used to keep all areas of vehicle movement damp enough to prevent dust raised from leaving the site. At a minimum, this will include wetting down such areas in the late morning and after work is completed for the day. Frequency of construction site watering shall be increased when wind speeds exceed 15 miles per hour (mph) to reduce PM₁₀ emissions.

AQ-2: Dust Mitigation - Speed Limit. An on-site speed limit of 15 miles per hour shall be imposed for operation of construction vehicles on dirt surfaces.

AQ-3: Dust Mitigation - Gravel Pad/Street Sweepings. Gravel pads shall be installed at all access points prior to beginning construction to prevent tracking of mud onto public roads. Streets adjacent to the project site shall be inspected daily for accumulation of mud, dirt, or silt on streets. Affected road segments shall be cleaned daily.

AQ-4: Dust Mitigation - Stockpile Treatment. All stockpiled soil materials shall be watered regularly as needed to inhibit dust generation. Excavated material and stockpiled soil shall be covered if not being used within the next 48 hours.

¹⁰ Santa Barbara County Air Pollution Control District, *Scope and Content of Air Quality Sections in Environmental Documents*, June 2008.

AQ-5 **Dust Mitigation - Grading Suspension.** Grading and scraping operations will be suspended when wind speeds exceed 20 mph to reduce PM₁₀ emissions.

AQ-6: **Dust Mitigation - Site Stabilization.** Disturbed areas will be permanently stabilized with landscaping ground cover or site improvements as soon as practicable following the completion of earthwork.

After clearing, grading, earth moving, or excavation is completed, the entire area of disturbed soil shall be treated to prevent wind pickup of soil. This may be accomplished by:

- A. Seeding and watering until grass cover is grown;
- B. Spreading soil binders;
- C. Sufficiently wetting the area down to form a crust on the surface with repeated soakings as necessary to maintain the crust and prevent dust pickup by the wind;
- D. Other methods approved in advance by the Air Pollution Control District.

All roadways, driveways, sidewalks, etc., shall be paved as soon as possible. Additionally, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

AQ-7: **Dust Mitigation - Truck Covering.** All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code (CVC) section 23114 (“freeboard” means vertical space between the top of the load and top of the trailer).

AQ-8: **Dust Mitigation - Monitor.** The contractor shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the City and SBCAPCD prior to permit clearance for grading.

AQ-9: **Dust Mitigation - Plan Specifications.** Prior to grading permit clearance, the applicant shall include all dust control requirements as notes on construction grading and building plans.

AQ-10: **Diesel Vehicle Emissions Control.** Operators of diesel-powered vehicles should turn off the engine after 5 minutes when the vehicle is not in motion, keep the vehicles well-tuned

and maintained, and retrofit engines with pollution control devices. Consideration should be given to purchasing trucks and buses that meet new US EPA standards ahead of schedule. Vehicle owners should use ultra-low-sulfur fuel in combination with pollution control equipment such as particulate matter filters.

AQ-11: Construction Equipment Emissions. As of June 15, 2008, fleet owners are subject to sections 2449, 2449.1, 2449.2, and 2449.3 in Title 13, Article 4.8, Chapter 9, of the California Code of Regulations (CCR) to reduce diesel particulate matter and criteria pollutant emissions from in-use off-road diesel-fueled vehicles. The following shall be adhered to during project grading and construction to reduce NO_x and PM_{2.5} emissions from construction equipment:

- All portable construction equipment shall be registered with the state's portable equipment registration program OR permitted by the District by September 18, 2008.
- Diesel construction equipment meeting the California Air Resources Board's Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting Tier 2 or higher emission standards should be used to the maximum extent feasible.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction equipment shall be maintained in tune per the manufacturer's specifications.
- Construction equipment operating on site shall be equipped with two to four degree engine timing retard or pre-combustion chamber engines.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- Diesel catalytic converters, diesel oxidation catalysts, and diesel particulate filters as certified and/or verified by US EPA or California shall be installed on equipment operating on site.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- Idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes; auxiliary power units should be used whenever possible.
- ~~Construction worker trips should be minimized by requiring carpooling and by providing for lunch on site.~~

AQ-12: Construction Equipment Operations. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number of equipment is operating at any one time. The Construction Contractor shall ensure that work crews shut off equipment when not in use. In addition, California's more recent anti-idling regulations (with some exemptions) require that drivers of diesel-fueled commercial vehicles weighing more than 10,000 pounds: (1) shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, and (2) shall not use diesel-fueled auxiliary power units for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle equipped with a sleeper berth, at any location.

AQ-13: Architectural Coating Emissions. Compliance with the SBCAPCD Rules and Regulations on the use of architectural coatings shall be implemented as applicable, including using pre-coated/natural colored building materials, using water-based or low-ROC coating, and using coating transfer or spray equipment with high transfer efficiency.

AQ-14: Asbestos. The project applicant shall complete and submit a SBAPCD Asbestos Demolition and Renovation Compliance Checklist at least 10 days prior to the commencement of any demolition activities.

AQ-15 Construction Worker Trips. Construction worker trips should be minimized by requiring carpooling and by providing for lunch on site.

6.7.3 Cumulative Construction Air Quality Impacts

Based on SBCAPCD and City evaluation criteria, cumulative construction-related air quality emissions from construction projects occurring within the basin are not significant. Project-specific air quality impacts and impacts from buildout of the entire specific plan area are identified as less than significant, and mitigation measures are identified to minimize construction dust, particulates, and equipment emissions. It cannot be known if or when other construction projects in the vicinity would be built. Other construction projects would also be subject to standard mitigation measures consistent with SBCAPCD and City policy to minimize incremental contributions to cumulative air quality impacts. Therefore, either the proposed project's or applicant's alternative's contribution to cumulative construction air quality impacts would be *less than significant*.

6.8 GREENHOUSE GAS

GHG emissions due to construction and operation of the project are presented in this analysis. Construction emissions consist of on-site construction activity and off-site hauling, and vendor and worker trip emissions. Operational emissions consist of natural gas and electricity consumption, transportation, water demand, and solid waste generation. The tools used to evaluate the GHG impacts associated with construction and operation of the project include the URBEMIS2007 Environmental Management Software and emission factors and data primarily provided by CARB, the US EPA and the California Climate Action Team. In addition, the traffic impact analysis for the project was used to determine transportation emissions associated with project-generated trips.

6.8.1 Existing Greenhouse Gas Setting

Global climate change refers to any significant change in climate measurements, such as temperature, precipitation, or wind, lasting for an extended period (i.e., decades or longer). Climate change may result from:

- Natural factors, such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun;
- Natural processes within the climate system (e.g., changes in ocean circulation, reduction in sunlight from the addition of GHG and other gases to the atmosphere from volcanic eruptions); and
- Human activities that change the atmosphere's composition (e.g., through burning fossil fuels) and the land surface (e.g., deforestation, reforestation, urbanization, desertification).

The global scientific community has concluded that human activities are likely responsible for current changes in the climate. The World Meteorological Organization (WMO) and United Nations Environmental Program (UNEP) established the Intergovernmental Panel on Climate Change (IPCC) in 1988. The IPCC assesses information (i.e., scientific literature) regarding human-induced climate change, impacts of human-induced climate change, and options for adaptation and mitigation of climate change. The IPCC reports its evaluations in special reports called "assessment reports." The latest assessment report (i.e., Fourth Assessment Report, consisting of three working group reports and a synthesis report based on the first three assessment reports) was published in 2007. In its 2007 report, the IPCC stated that global temperature increases since the mid-20th century was "very likely" attributable to man-made activities (greater than 90 percent certainty).

Heat retention within the atmosphere is an essential process to sustain life on Earth. The natural process through which heat is retained in the troposphere¹¹ is called the “greenhouse effect.” The greenhouse effect traps heat in the troposphere through a three-fold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long-wave radiation; and GHGs in the upper atmosphere absorb this long-wave radiation and emit this long-wave radiation into space and toward the Earth. This “trapping” of the long-wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect. According to the National Oceanic and Atmospheric Administration (NOAA), without the greenhouse effect, the Earth’s average temperature would be approximately -18 degrees Celsius (°C) (0°F) instead of its present 14°C (57°F).¹² The most abundant GHGs are water vapor and carbon dioxide (CO₂). Many other trace GHGs have a greater ability to absorb and re-radiate long-wave radiation than water vapor or CO₂; however, these gases are not as plentiful. For this reason, and to gauge the potency of GHGs, scientists have established a Global Warming Potential (GWP) for each GHG based on its ability to absorb and re-radiate long-wave radiation. The GWP of a gas is determined using CO₂ as the reference gas with a GWP of 1. As an example, a gas with a GWP of 10 is 10 times more potent than CO₂ over a specified time period (typically 100 years) with respect to its ability to absorb and re-radiate long-wave radiation. The use of GWP allows GHG emissions to be reported using CO₂ as a baseline. The sum of each GHG multiplied by its associated GWP is referred to as carbon dioxide equivalents (CO₂e). This essentially means that 1 metric ton of a GHG with a GWP of 10 is equivalent to 10 metric tons of CO₂ over a specified time period.

The following gases are considered to be the primary GHGs.¹³ Although water vapor is a primary GHG, it is not technologically possible to regulate ambient concentrations because of the influence of the oceans and other bodies of water.

- *Water Vapor (H₂O)*. Although water vapor has not received as much scrutiny as the other GHGs, it is the primary contributor to the greenhouse effect. Water vapor and clouds contribute 66 to 85 percent of the greenhouse effect (water vapor alone contributes 36 to 66 percent).¹⁴ Natural processes such as evaporation from oceans and rivers and transpiration from plants contribute 90 percent and 10 percent of the water vapor in our atmosphere, respectively.¹⁵ The primary human-related source

¹¹ The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth’s surface from 10 to 12 kilometers). In general, day-to-day weather is confined to the troposphere (e.g., clouds, rain, convection, etc.)

¹² Data is available at <http://www.ncdc.noaa.gov/oa/climate/globalwarming.html>.

¹³ All GWPs are given as 100-year GWP. Unless noted otherwise, all GWPs were obtained from the Intergovernmental Panel on Climate Change. *Climate Change 1995: The Science of Climate Change – Contribution of Working Group I to the Second Assessment Report of the IPCC*. Cambridge (UK): Cambridge University Press, 1996.

¹⁴ Gavin A. Schmidt, “Water Vapour: Feedback or Forcing?” <http://www.realclimate.org/index.php?p=142>. 2005.

¹⁵ United States Geological Survey, “The Water Cycle: Evaporation,” <http://ga.water.usgs.gov/edu/watercycleevaporation.html>. 2007.

of water vapor comes from fuel combustion in motor vehicles; however, this is not believed to contribute a significant amount (less than 1 percent) to atmospheric concentrations of water vapor.¹⁶ Therefore, the control and reduction of water vapor emissions is not within reach of human actions. The Intergovernmental Panel on Climate Change (IPCC) has not determined a GWP for water vapor.

- *Carbon Dioxide (CO₂)*. Carbon dioxide primarily is generated by fossil fuel combustion from stationary and mobile sources. Due to the emergence of industrial facilities and mobile sources over the past 250 years, the concentration of carbon dioxide in the atmosphere has increased 35 percent.¹⁷ Carbon dioxide is the most widely emitted GHG and is the reference gas (GWP of 1) for determining the GWPs of other GHGs. According to the California Energy Commission's *Inventory of California Greenhouse Gas Emissions and Sinks 1990 to 2004*, 83.8 percent of California's GHG emissions were carbon dioxide in 2004 (CEC, December 2006a).
- *Methane (CH₄)*. Methane is emitted from biogenic sources, incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. In the United States, the top three sources of methane are landfills, natural gas systems, and enteric fermentation.¹⁸ Methane is the primary component of natural gas, which is used for space and water heating, steam production, and power generation. The GWP of methane is 21.
- *Nitrous Oxide (N₂O)*. Nitrous oxide is produced by both natural and human-related sources. Primary human-related sources include agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. The GWP of nitrous oxide is 310.
- *Hydrofluorocarbons (HFCs)*. HFCs typically are used as refrigerants in both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is growing particularly as the continued phaseout of chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) gains momentum. The GWP of HFCs range from 140 for HFC-152a to 6,300 for HFC-236fa.
- *Perfluorocarbons (PFCs)*. Perfluorocarbons are compounds consisting of carbon and fluorine. They are primarily created as a byproduct of aluminum production and semiconductor manufacturing. Perfluorocarbons are potent GHGs with a GWP several thousand times that of carbon dioxide, depending on the specific PFC. Another area of concern regarding PFCs is their long atmospheric lifetime (up to 50,000 years).¹⁹ The GWPs of PFCs range from 5,700 to 11,900.
- *Sulfur Hexafluoride (SF₆)*. Sulfur hexafluoride is a colorless, odorless, nontoxic, nonflammable gas. It is most commonly used as an electrical insulator in high voltage equipment that transmits and distributes electricity. Sulfur hexafluoride is the most potent GHG that has been evaluated by the IPCC with a GWP of 23,900. However, its global warming contribution is not as high as the GWP

¹⁶ Energy Information Administration, "Alternatives to Traditional Transportation Fuels 1994," <http://www.eia.doe.gov/cneaf/alternate/page/environment/exec2.html>. 2008.

¹⁷ United States Environmental Protection Agency, "Inventory of US Greenhouse Gas Emissions and Sinks 1990-2006," <http://www.epa.gov/climatechange/emissions/usinventoryreport.html>. 2008.

¹⁸ Ibid, "Methane: Sources and Emissions," <http://www.epa.gov/methane/sources.html>. n.d.

¹⁹ Energy Information Administration, "Other Gases: Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride," http://www.eia.doe.gov/oiaf/1605/gg00rpt/other_gases.html. n.d.

would indicate due to its low mixing ratio, as compared to carbon dioxide (4 parts per trillion [ppt] of SF₆ in 1990 versus 365 parts per million [ppm] of CO₂).²⁰

In addition to the primary GHGs discussed above, many other compounds have the potential to contribute to the greenhouse effect. Some of these substances previously were identified as stratospheric ozone depleters; therefore, their gradual phaseout currently is in effect. Some of the noteworthy compounds are discussed below:

- *Hydrochlorofluorocarbons (HCFCs)*. HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, all developed countries that adhere to the protocol are subject to a consumption cap and gradual phaseout of HCFCs. The United States is scheduled to reduce its HCFC consumption to the allowed cap by 2030. The GWPs of HCFCs range from 93 for HCFC-123 to 2,000 for HCFC-142b.²¹
- *1,1,1-trichloroethane*. 1,1,1-trichloroethane or methyl chloroform is a solvent and degreasing agent that was commonly used by manufacturers. In 1992, the US EPA issued Final Rule 57 FR 33754, which scheduled the phaseout of methyl chloroform by 2002.²² This was later accelerated to a 1995 phaseout. The GWP of methyl chloroform is 110 times that of carbon dioxide.²³
- *Chlorofluorocarbons (CFCs)*. CFCs are used as refrigerants, cleaning solvents, and aerosol spray propellants. CFCs also were part of the US EPA's Final Rule 57 FR 3374, and were phased out in 1995. Currently, CFCs have been replaced by HFCs in cooling systems and a variety of alternatives for cleaning solvents. Nevertheless, CFCs remain suspended in the atmosphere, contributing to the greenhouse effect. CFCs are potent GHGs with GWPs ranging from 4,600 for CFC-11 to 14,000 for CFC-13.²⁴
- *Ozone (O₃)*. Ozone occurs naturally in the stratosphere²⁵ where it is largely responsible for filtering harmful ultraviolet (UV) radiation. In the troposphere, ozone acts as a GHG by absorbing and re-radiating the infrared energy emitted by the Earth. As a result of the industrial revolution and rising emissions of oxides of nitrogen and volatile organic compounds, both of which act as ozone

²⁰ United States Environmental Protection Agency, "High GWP Gases and Climate Change," <http://www.epa.gov/highgwp/scientific.html#sf6>. n.d.

²¹ United States Environmental Protection Agency, "Protection of Stratospheric Ozone: Listing of Global Warming Potential for Ozone-Depleting Substances," <http://www.epa.gov/fedrgstr/EPA-AIR/1996/January/Day-19/pr-372.html>. 1996.

²² Ibid, "The Accelerated Phase-Out of Class 1 Ozone-Depleting Substances," <http://www.epa.gov/ozone/title6/phaseout/accfact.html>. 2007.

²³ Ibid, "Protection of Stratospheric Ozone: Listing of Global Warming Potential for Ozone-Depleting Substances," <http://www.epa.gov/fedrgstr/EPA-AIR/1996/January/Day-19/pr-372.html>. 1996.

²⁴ Ibid, "Class I Ozone Depleting Substances," <http://www.epa.gov/ozone/ods.html>. 2006.

²⁵ The stratosphere is defined as the layer of the Earth's atmosphere above the troposphere from approximately 10 to 12 miles up to 30 to 35 miles. The ozone layer is located in the stratosphere.

precursors, the concentrations of ozone in the troposphere have increased.²⁶ Due to the short life span of ozone in the troposphere, its concentration and contribution to global climate change is not well established. However, the greenhouse effect of tropospheric ozone is considered small, as the radioactive forcing²⁷ of ozone is 25 percent of that of CO₂.²⁸

State Regulatory Setting

In order to address and mitigate impacts from global climate change due to GHG emissions, the State of California has enacted legislation targeting GHG emissions. A comprehensive discussion of the major legislation enacted by the state is provided in **Appendix 6.0**. Also, see **Section 6.5.2**.

State GHG Emission Inventory

Based upon the 2004 GHG inventory data (i.e., the latest year for which data are available) compiled by CARB for the *California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit*, California emitted 484 million metric ton carbon dioxide equivalent (MMTCO_{2e}), including emissions resulting from out-of-state electrical generation.²⁹ A CEC emissions inventory report placed CO₂ produced by fossil fuel combustion in California as the largest source of GHG emissions in 2004, accounting for 81 percent of the total GHG emissions (CEC, December 2006a). CO₂ emissions from other sources contributed 2.8 percent of the total GHG emissions; methane emissions 5.7 percent; nitrous oxide emissions 6.8 percent; and the remaining 2.9 percent was composed of emissions of high-GWP gases (CEC, December 2006a). These high-GWP gases are largely composed of refrigerants, with small contributions of SF₆ used in connection with insulating materials for electricity transmission and distribution.

The primary contributors to GHG emissions in California are transportation, electric power production from both in-state and out-of-state sources, industry, agriculture and forestry, and other sources, which include commercial and residential activities. These primary contributors to California's GHG emissions and their relative contributions are presented in **Table 6.0-11, GHG Sources in California**. It should be noted that emissions from each of these economic sectors are not confined to emissions from a single process, since there is crossover with other sectors. For example, fossil fuel combustion occurs in several of the sectors in **Table 6.0-11**. In the case of landfills, methane emissions and CO₂ emissions and sinks are

²⁶ Intergovernmental Panel on Climate Change, "Climate Change 2001: Tropospheric Ozone," http://www.grida.no/climate/ipcc_tar/wg1/142.htm. n.d.

²⁷ Radioactive forcing, measured in Watts/m², is an externally imposed perturbation (e.g., stimulated by greenhouse gases) in the radioactive energy budget of the Earth's climate system (i.e., energy and heat retained in the troposphere minus energy passed to the stratosphere).

²⁸ Intergovernmental Panel on Climate Change, "Climate Change 2007: The Physical Science Basis, Summary for Policymakers," http://ipcc-wg1.ucar.edu/wg1/docs/WG1AR4_SPM_PlenaryApproved.pdf. 2007.

²⁹ California Air Resources Board, *California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit*, 2007.

reported in their respective portions of the inventory. Taken together, the CO₂ sinks approximately offset the landfill methane emissions. Additionally, fuel-related GHG emissions from transporting wastes to landfills are included in transportation fuels.

**Table 6.0-11
GHG Sources in California**

Source Category	Annual GHG Emissions (MMTCO ₂ e) ¹	Percent of Total	Annual GHG Emissions (MMTCO ₂ e) ²	Percent of Total
Agriculture	27.9	5.8%	27.9	6.6%
Commercial Uses	12.8	2.6%	12.8	3.0%
Electricity Generation	119.8	24.7%	58.5	13.8%
Forestry (excluding sinks)	0.2	0.0%	0.2	0.0%
Industrial Uses	96.2	19.9%	96.2	22.7%
Residential Uses	29.1	6.0%	29.1	6.9%
Transportation	182.4	37.7%	182.4	43.1%
Other ³	16.0	3.3%	16.0	3.8%
Totals	484.4	100.0%	423.1	100.0%

Source: California Air Resources Board, California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, 2007.

¹ Includes emissions associated with imported electricity, which account for 61.3 MMTCO₂e annually.

² Excludes emissions associated with imported electricity.

³ Unspecified combustion and use of ozone-depleting substances.

Existing Project GHG Emission Inventory

The existing project site consists of a 113-room motel and 5,050 square feet of restaurant space. The existing land uses would result in direct annual emissions of GHGs during operation. These emissions, primarily CO₂, CH₄, and N₂O, are the result of fuel combustion from electricity consumption, building heating systems and motor vehicles. Building and motor vehicle air conditioning systems may use HFCs (and HCFCs and CFCs to the extent that they have not been completely phased out at later dates); however, these emissions are not quantified since they would only occur through accidental leaks and it is not possible to reliably quantify these accidental losses.

The direct emissions of CO₂, the primary greenhouse gas associated with operation of the existing site were estimated using the URBEMIS2007 Environmental Management Software. Because the software only provides CO₂ emissions, the following adjustments were used to convert CO₂ emissions to GHG emissions on a CO₂e basis:

- Area sources (natural gas combustion): The CO₂ emissions from natural gas consumption for the project were adjusted based on emission factors for CO₂, CH₄, and N₂O for natural gas combustion from URBEMIS2007 and the California Climate Action Registry's *General Reporting Protocol*, Version 3.0 (CCAR, April 2008).
- Motor vehicles: Based on the US EPA's *Greenhouse Gas Emissions from a Typical Passenger Vehicle (EPA420-F-05-004)*, CO₂ emissions associated with project-generated trips were multiplied by a factor based on the assumption that CO₂ represents 95 percent of the CO_{2e} emissions associated with passenger vehicles, which account for most of the vehicle trips (US EPA, February 2005).

The existing site also results in indirect GHG emissions from various off-site sources. These include emissions due to electricity demands, water demands, wastewater generation, and solid waste generation. Emission factors for GHGs due to electrical demand from the existing land uses were obtained from the Southern California Edison's (SCE) *2006 Power/Utility Protocol (PUP) Report* to the California Climate Action Registry (CCAR).³⁰ The CCAR is a private non-profit organization formed by the State of California and serves as a voluntary GHG registry to protect and promote early actions to reduce GHG emissions by organizations. CCAR members voluntarily measure, verify, and publicly report their GHG emissions. The *SCE 2006 PUP Report* provides a GHG emission factor from electrical generation in units of metric tons of CO_{2e} per megawatt-hour (MW-hr), which was converted to metric tons per million kilowatt-hours (10⁶ kW-hr). This emission factor takes into account the current mix of energy sources used to generate electricity for SCE and the relative carbon intensities of these sources, and includes natural gas, coal, nuclear, large hydroelectric, and other renewable sources of energy. The estimated annual electrical demand for the project was obtained from factors in the South Coast Air Quality Management District's *CEQA Air Quality Handbook* (SCAQMD, 1993).

In addition to electrical demand, the existing site would also result in indirect GHG emissions due to water demand, wastewater treatment, and solid waste generation. GHG emissions from water demand are due to the electricity needed to convey, treat, and distribute potable water. GHG emissions from wastewater are due to the electricity needed to treat wastewater. GHG emissions from solid waste generation are due to the decomposition of organic material, which releases CH₄ into the atmosphere. The annual electrical demand factor for water demand was obtained from the CEC's *Refining Estimates of Water-Related Energy Use in California, PIER Final Project Report (CEC-500-2006-118)* (CEC, December 2006b). GHG emission factors for wastewater treatment and solid waste generation were obtained from the US EPA's *Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I, Chapter 4.3.5* (US EPA, February 1998) and *Greenhouse Gas Emission Factors for Management of Selected Materials in Municipal Solid Waste (EPA-530-R-98-013)* (US EPA, September 1998). Water demand, wastewater

³⁰ California Climate Action Registry, "Reporting Online Tool, Public Annual Entity Emissions," *Southern California Edison, PUP Report*, (2006), <http://www.climateregistry.org/CARROT/public/Reports.aspx>.

generation, and solid waste generation rates were obtained from the City of Santa Barbara, *Draft Initial Study/Environmental Checklist MST2007-00591, Project 3714-3744 State Street and 3715 San Remo Drive* (City of Santa Barbara, May 2008).

The estimated maximum annual GHG emissions associated with operation of the existing site are shown in **Table 6.0-12, Estimated Existing Annual GHG Emissions**.

**Table 6.0-12
Estimated Existing Annual GHG Emissions**

GHG Emissions Source	Emissions (Metric Tons CO ₂ e/year)
Annual Existing GHG Emissions:	
Motor Vehicles	837.15
Area Sources (Natural Gas Consumption)	190.28
Electricity Consumption	244.39
Solid Waste Generation	9.02
Water Supply	15.43
Wastewater	2.30
Total Annual Existing GHG Emissions	1,298.57

Source: Impact Sciences, Inc., 2008. Emissions calculations are provided in Appendix 6.0. Totals in table may not appear to add exactly due to rounding.

6.8.2 Proposed Project Greenhouse Gas Assessment

The proposed project would result in the construction and operation of 73 condominiums and a 106-room hotel. As discussed in the previous section, the City of Santa Barbara has adopted ordinances and guidelines in an effort to reduce the energy consumption of new construction. The proposed project would comply with applicable ordinances. In May 2008, the City's increased minimum energy efficiency standards went into effect. The increased standards require that all appliances, when installed, be Energy Star rated appliances, when available, in residential buildings. New low-rise residential buildings are required to consume 20 percent less energy than is mandated by law. New hotel buildings are generally required to consume 10 percent less energy for heating and cooling systems than is mandated by law. Additionally, the City's Landscape Design Standards for Water Conservation went into effect in September 2008. This standard requires that new landscaping or alterations to existing landscaping that is subject to review by the Architectural Board of Review, the Historic Landmarks Commission, or the

Single Family Design Board are required to use reclaimed water for irrigation of greenbelts when suitable reclaimed water is available.

The proposed project would result in one-time emissions of GHGs during construction. These emissions, primarily CO₂, CH₄, and N₂O, are the result of fuel combustion from construction equipment and motor vehicles. The other primary GHGs (perfluorocarbons and sulfur hexafluoride) are associated with specific industrial sources and are not expected to be emitted by the proposed project.

The one-time emissions of CO₂, the primary greenhouse gas associated with construction of the proposed project, were estimated using URBEMIS2007 using the same construction phasing, equipment, and hauling assumptions in the air quality analysis. In addition to criteria pollutant emissions, URBEMIS2007 calculates CO₂ emissions for land use projects. The following adjustments were used to convert the calculated CO₂ emissions to GHG emissions on a carbon dioxide equivalent basis:

- Construction diesel trucks and equipment: The CO₂ emissions associated with off-road and on-road equipment were multiplied by a factor based on the assumption that CO₂ represents approximately 99.4 and 99.0 percent, respectively, of the CO_{2e} emissions. These assumptions were derived from the California Climate Action Registry's *General Reporting Protocol*, Version 3.0 (CCAR, April 2008), and the California Energy Commission.³¹
- Motor vehicles: Based on the US EPA's *Greenhouse Gas Emissions from a Typical Passenger Vehicle (EPA420-F-05-004)*, CO₂ emissions associated with project-generated trips were multiplied by a factor based on the assumption that CO₂ represents 95 percent of the CO_{2e} emissions associated with passenger vehicles, which account for most of the vehicle trips (US EPA, February 2005).

The estimated one-time GHG emissions associated with construction of the proposed project are shown in **Table 6.0-13, Estimated Construction GHG Emissions - Proposed Project**. These emissions are presented in order to fully disclose the impacts. The CARB *Proposal for Significance Thresholds for GHGs under CEQA* does not currently include construction emissions as part of any proposed annual threshold. Rather, CARB is proposing to evaluate the significance of construction GHG emissions in accordance with as yet to be determined performance standards. Although the performance standards have not been determined, the total project emissions from construction are relatively small and would likely not result in a significant impact.

At full buildout, the proposed project would result in direct annual emissions of GHGs during operation. These emissions, primarily CO₂, CH₄, and N₂O, are the result of fuel combustion from electricity consumption, building heating systems and motor vehicles. Building and motor vehicle air conditioning systems may use HFCs (and HCFCs and CFCs to the extent that they have not been completely phased

³¹ California Energy Commission, *Diesel Use in California*, Remarks by Commissioner James D. Boyd, (2002).

out at later dates); however, these emissions are not quantified since they would only occur through accidental leaks.

Table 6.0-13
Estimated Construction GHG Emissions - Proposed Project

GHG Emissions Source	Emissions (Metric Tons CO ₂ e/year)
One-Time Emissions:	
Construction Year 2009	377.70
Construction Year 2010	338.00
Construction Year 2011	415.39
One-Time Total GHG Emissions	1,131.09

*Source: Impact Sciences, Inc., 2008. Emissions calculations are provided in Appendix 6.0.
Totals in table may not appear to add exactly due to rounding.*

The operational GHG emissions were estimated using the same methodology described previously for the existing project site. The estimated maximum annual GHG emissions associated with operation of the proposed project are shown in **Table 6.0-14, Estimated Annual GHG Emissions – Proposed Project**. While the proposed project has fewer overall trips compared to the existing site, the overall vehicle miles traveled is greater primarily due to the home-work commutes associated with the residential land uses. The URBEMIS2007 model assumes that residential home-work trips result in more miles traveled per trip than for commercial trips. This results in greater motor vehicle GHG emissions compared to the existing site.

The GHG emissions presented in the table above include the required energy efficiency requirements under the City of Santa Barbara ordinances (20 percent below Title 24 for residential uses and 10 percent below for hotel uses). While CARB has not yet proposed significance thresholds for residential and commercial projects, the net annual emissions associated with the proposed project would likely not exceed the threshold for residential and commercial projects if such a threshold were established. Compared to the State of California's GHG emission inventory, the proposed project's net emissions represents approximately 0.0001 percent of the state's GHG emissions. Clearly, the project on its own would not impact global climate change.

However, the proposed project's cumulative emissions combined with all other projects in the state could result in climate change impacts. While no significance threshold has been formally adopted by any state or local agency, cumulative impacts have been addressed in accordance with preliminary and draft

guidance documents from CARB and OPR. Both CARB and OPR have proposed that projects reduce energy consumption relative to “business as usual” – that is, energy consumption rates that would occur in the absence of green building standards or other energy efficiency regulations enacted to reduce greenhouse gas emissions. The proposed project would comply with the additional requirements of the City’s energy ordinance (see **Section 10.5.3**) and would incorporate other sustainable measures as discussed in **Table 10.0-2**. The proposed project would, therefore, not substantially contribute to cumulative global warming impacts.

Table 6.0-14
Estimated Annual GHG Emissions – Proposed Project

GHG Emissions Source	Emissions (Metric Tons CO ₂ e/year)
Annual Emissions:	
Motor Vehicles	1,002.62
Area Sources (Natural Gas Consumption)	308.32
Electricity Consumption	258.11
Solid Waste Generation	26.80
Water Supply	35.93
Wastewater	5.36
Annual GHG Emissions	1,637.14
Existing Land Use GHG Emissions	1,298.57
Net Annual GHG Emissions	338.57

Source: Impact Sciences, Inc., 2008. Emissions calculations are provided in Appendix 6.0. Totals in table may not appear to add exactly due to rounding.

6.8.3 Applicant’s Alternative Greenhouse Gas Assessment

The applicant’s alternative would result in the construction and operation of 73 condominiums and a 14,600-square-foot office development. As discussed in the previous section, the City of Santa Barbara has adopted ordinances and guidelines in an effort to reduce the energy consumption of new construction. The applicant’s alternative would comply with applicable ordinances.

The applicant’s alternative would result in one-time emissions of GHGs during construction. These emissions, primarily CO₂, CH₄, and N₂O, are the result of fuel combustion from construction equipment and motor vehicles. The other primary GHGs (perfluorocarbons and sulfur hexafluoride) are associated with specific industrial sources and are not expected to be emitted by the applicant’s alternative.

The one-time emissions of CO₂, the primary greenhouse gas associated with construction of the applicant's alternative were estimated using the same methodologies previously described. The estimated one-time GHG emissions associated with construction of the applicant's alternative are shown in **Table 6.0-15, Estimated Construction GHG Emissions – Applicant's Alternative**. These emissions are presented in order to fully disclose the impacts. The CARB *Proposal for Significance Thresholds for GHGs under CEQA* does not currently include construction emissions as part of any proposed annual threshold. Rather, CARB is proposing to evaluate the significance of construction GHG emissions in accordance with as yet to be determined performance standards. Although the performance standards have not been determined, the total emissions for the applicant's alternative are relatively small and would likely not result in a significant impact.

Table 6.0-15
Estimated Construction GHG Emissions – Applicant's Alternative

GHG Emissions Source	Emissions (Metric Tons CO ₂ e/year)
One-Time Emissions:	
Construction Year 2009	377.24
Construction Year 2010	338.00
Construction Year 2011	242.20
One-Time Total GHG Emissions	957.44

Source: Impact Sciences, Inc., 2008. Emissions calculations are provided in Appendix 6.0. Totals in table may not appear to add exactly due to rounding.

At full buildout, the alternative project would result in direct annual emissions of GHGs during operation. These emissions, primarily CO₂, CH₄, and N₂O, are the result of fuel combustion from electricity consumption, building heating systems and motor vehicles. Building and motor vehicle air conditioning systems may use HFCs (and HCFCs and CFCs to the extent that they have not been completely phased out at later dates); however, these emissions are not quantified since they would only occur through accidental leaks.

The operational GHG emissions were estimated using the same methodology described previously for the existing project site. The estimated maximum annual GHG emissions associated with operation of the applicant's alternative are shown in **Table 6.0-16, Estimated Annual GHG Emissions – Applicant's Alternative**.

The GHG emissions presented in **Table 6.0-16** include the required energy efficiency requirements under the City of Santa Barbara ordinances (20 percent for residential uses and 10 percent for nonresidential uses). While CARB has not yet proposed significance thresholds for residential and commercial projects, the net annual emissions associated with the applicant’s alternative would likely not exceed the threshold for residential and commercial projects if such a threshold were established. In addition, the net emissions would result in a reduction compared to existing levels. Clearly, the project on its own would not impact global climate change.

Table 6.0-16
Estimated Annual GHG Emissions – Applicant’s Alternative

GHG Emissions Source	Emissions (Metric Tons CO ₂ e/year)
Annual Emissions:	
Motor Vehicles	638.77
Area Sources (Natural Gas Consumption)	174.21
Electricity Consumption	145.99
Solid Waste Generation	21.00
Water Supply	23.25
Wastewater	3.50
Annual GHG Emissions	1,006.72
Existing Land Use GHG Emissions	1,298.57
Net Annual GHG Emissions	-291.85

*Source: Impact Sciences, Inc., 2008. Emissions calculations are provided in Appendix 6.0.
Totals in table may not appear to add exactly due to rounding.*

While no significance threshold has been formally adopted by any state or local agency, cumulative impacts have been addressed in accordance with consistency with preliminary and draft guidance documents from CARB and OPR. Both CARB and OPR have proposed that projects reduce energy consumption relative to “business as usual”—that is, energy consumption rates that would occur in the absence of green building standards or other energy efficiency regulations enacted to reduce greenhouse gas emissions. The applicant’s alternative would comply with the additional requirements of the City’s energy ordinance (see **Section 10.5.3**) and would incorporate other sustainable measures as discussed in **Table 10.0-2**. The applicant’s alternative would, therefore, not substantially contribute to cumulative global warming impacts

6.9 SUMMARY OF AIR QUALITY IMPACTS

6.9.1 Construction Air Quality Impacts

Project-specific and cumulative construction air quality impacts would be *less than significant* (Class III) for either the proposed project or the applicant's alternative. Recommended mitigation measures, which are also standard conditions of approval in the City, have been identified that would minimize construction-related emissions associated with dust, equipment exhaust, and architectural coating application.

6.9.2 Greenhouse Gas Impacts

While no significance threshold has been formally adopted by any state or local agency, cumulative impacts have been addressed in accordance with preliminary and draft guidance documents from CARB and OPR. Both CARB and OPR have proposed that projects reduce energy consumption relative to "business as usual"—that is, energy consumption rates that would occur in the absence of green building standards or other energy efficiency regulations enacted to reduce greenhouse gas emissions. The proposed project and applicant's alternative would comply with the additional requirements of the City's energy ordinance. The project would be located on a transit corridor and would not add substantial vehicle miles traveled. The greenhouse gas emissions of either the proposed project or applicant's alternative would be minimal.

7.0 TRANSPORTATION AND CIRCULATION

7.1 INTRODUCTION

The following section provides an overview of the traffic, circulation, and parking systems in and around the Sandman Inn project site as well as a description of transportation-related policies relevant to the proposed project. The section concludes with an evaluation of impacts related to pedestrian and vehicular transportation and parking that would result from implementation of either the proposed project or the applicant's alternative. Mitigation measures are identified, as appropriate.

This section has been prepared using:

- *Sandman Inn Redevelopment Project Traffic Study, Santa Barbara, California, March 2009, prepared by Iteris, Inc. prepared for the project.*

Additionally, the traffic analysis utilized information and data from:

- *Associated Transportation Engineers (ATE), Sandman Inn Redevelopment Project, Santa Barbara, California, Traffic and Circulation Study, August 2005;*
- *Associated Transportation Engineers (ATE), Supplemental Analysis of the Access Alternative for the Proposed Sandman Inn Redevelopment Project, City of Santa Barbara, March 2006.*
- *Associated Transportation Engineers (ATE), Revised Trip Generation for the Sandman Inn Project, November 2007.*

7.2 REGULATORY FRAMEWORK

7.2.1 City of Santa Barbara Development Requirements

Currently, the amount and density of development that can occur in the City is governed by different sets of regulations. Passed by the voters in 1989, Measure E was incorporated into the City Charter as Charter Section 1508. This Charter Section not only places a ceiling on the total amount of non-residential square footage developed in the City until the year 2010, it also states that new non-residential construction can only occur where it will not cause a significant and unmitigated adverse impact on traffic within the City.

Traffic impacts are currently determined based on adopted Level of Service (LOS) standards for signalized City intersections. Currently, signalized intersections are considered impacted if they exceed the City's LOS goal of C, which carries a Volume to Capacity (V/C) ratio of 0.80. However, for the purposes of environmental assessment in the City of Santa Barbara under the California Environmental Quality Act, a signalized intersection is considered impacted if a project causes the V/C Ratio to exceed

0.77. By state law, in any case where a project results in a significant traffic impact, an environmental impact report must be prepared.

7.2.2 Congestion Management Plan

In June, 1990 California voters approved legislation (Proposition 111) that increased funding for California's transportation system. With the passage of Proposition 111 there were new requirements for the transportation planning process that required urbanized counties, such as Santa Barbara County, to prepare, adopt, and biennially update a Congestion Management Program (CMP). The CMP is a comprehensive program designed to reduce auto-related congestion through capital improvements, travel demand management, and coordinated land use planning among all jurisdictions. The CMP was also intended to facilitate an integrated approach to programming transportation improvements.

As the designated Congestion Management Agency (CMA) for Santa Barbara County, Santa Barbara County Association of Governments (SBCAG) is required to monitor CMP implementation and annually determine if each local jurisdiction is in conformance with the CMP. As required, the CMP establishes a minimum roadway level of service (LOS D or the existing LOS of the facility, whichever is worse). Based on the Santa Barbara County Association of Governments (SBCAG) CMP, LOS E is the minimum acceptable level of service for CMP intersections, except where a segment or intersection has been designated deficient and a deficiency plan has been adopted.

At CMP intersections, the project would be considered to have a significant effect on the level of service if it would:

- Decrease the LOS at an intersection operating at LOS A or B, two levels of service from project added traffic.
- Decrease the level of service from LOS C to LOS D.
- Add 20 or more peak-hour trips to an intersection operating at LOS D.
- Add 10 or more peak-hour trips to an intersection operating at LOS E or F.

The CMA agency (such as the City) may set more stringent LOS standards at its discretion. The LOS standards adopted by local jurisdictions for the Circulation Element of their General plans, or for environmental review of projects under the California Environmental Quality Act (CEQA), may be more stringent than those specified in the CMP.

Study area CMP roadway segments and intersections include the following:

- CMP Roadways Sections
 - State Street from De La Vina to Hollister Avenue
 - Las Positas Road from US Highway 101 Ramps to State Street.
 - US Highway 101
- CMP Study Area Intersections
 - Las Positas Road at US Highway 101 Northbound Ramps
 - Las Positas Road at US Highway 101 Southbound Ramps
 - US Highway 101 Northbound Ramps at Earl Warren Showground/Calle Real
 - Hope Avenue at US Highway Northbound Ramps
 - Las Positas Road at Modoc Road
 - Las Positas Road at State Street
 - State Street at Hope Avenue
 - State Street at La Cumbre Road
 - State Street at Calle Real/US Highway 101
 - State Street at Plaza Street
 - La Cumbre Road at La Cumbre Lane

As discussed earlier, the LOS and intersection impact thresholds for the City are more restrictive than those set forth in the CMP and therefore the City's criteria are the significance thresholds that are followed for this analysis.

7.2.3 General Plan Circulation Element Policies and Implementation Measures

Several policies within the City's General Plan Circulation Element also provide direction regarding the preparation and review of transportation operations for developments. These include:

- The City shall facilitate the use of transit and alternative modes of transportation by emphasizing compact, pedestrian oriented development and connections among all forms of travel during the development and environmental review process.
- The City shall continue to use existing traffic standards and impact thresholds as described in the City's Master Environmental Assessment (MEA), until new standards and thresholds consistent with the 1997 Circulation Element are developed and incorporated into the City's Environmental Goals and Guidelines.

7.2.4 Upper State Street Study

In March 2007 the City completed the *Upper State Street Study* (USSS). The purpose of the USSS was to identify changes that could improve traffic circulation and urban design in the study area. Issues addressed in the USSS included area character and openness, landscaping and “streetscape” design, scenic views, open space and creeks, building heights and setback distances from the street, vehicle traffic, circulation and parking, and pedestrian and bicycle safety and connectivity in the area. The City Council specified that this effort be focused on roadway improvements and amendments to development and design standards that could occur within the existing City policy framework. Section 5.5.4 provides a detailed discussion of the USSS.

The USSS includes recommendations to address mid-block congestion and safety. One such recommendation that specifically applies to the access and circulation component of the proposed project is that expanded and landscaped medians are recommended on State Street along the project frontage to control turning movements in to and out of the uncoordinated driveways along State Street in order to reduce the friction and conflicts between vehicles and pedestrians and bicyclists travelling along State Street.

The USSS also provides driveway spacing guidelines as a means to create more uniform spacing and minimize conflict points with through traffic. These recommendations within the USSS provide direction regarding the review of transportation operations for developments, and will be analyzed in relation to the proposed project and applicant’s alternative.

7.3 EXISTING SETTING

7.3.1 Existing Project Site

Existing structures include a 5,050-square-foot restaurant with capacity for 216 patrons, and the Sandman Inn with 113 rooms. The existing structures are relatively low-profile, 1960s-style buildings distributed throughout the property, interspersed with parking and open areas. The hotel includes one- and two-story hotel buildings and associated improvements including swimming pools. The restaurant operates as an independent business from the hotel.

The current site also provides for access to the Town & County Apartments (located immediately north of the main project site) through the Sandman Inn parking area from State Street. Immediately north of the Town & County Apartments is a residential duplex located at 3715 San Remo Drive

7.3.2 Existing Streets and Highways

The project site is located on State Street several blocks north of US 101 between North Hope Avenue and North Ontare Road, as shown in **Figure 3.0-1**. Local access to the facility is currently provided from State Street and Hitchcock Way.

US Highway 101

US Highway 101 (US 101) is a six-lane freeway located south of the site and provides regional access to the project site via the Las Positas Road, State Street, and South La Cumbre Road/South Hope Avenue interchanges. US 101 connects the project area to the City of Santa Barbara to the south and to Goleta to the north.

State Street

State Street is a four-lane multi-modal arterial and provides access to the project site. The street provides service for automobiles, bus transit vehicles, bicycles, and pedestrians. The average daily trips (ADT) on State Street between Las Positas Road to the east and La Cumbre Road to the west generally range from 24,400 to 30,800 vehicles per day. There are frequent signalized intersections and crosswalks, and multiple uncoordinated driveways into small buildings and commercial areas. Left turns onto State Street are restricted in areas with raised medians, and where allowed, may be difficult during peak periods of traffic. The speed limit along State Street in the project area is 35 miles per hour.

The addition of Class II on-street bike lanes¹ along State Street has increased bike activity as well as potential bike-car conflicts for right turns. For the most part, the pedestrian experience includes multiple driveways, conflicts with cars at large intersections, and the occasional sidewalk obstruction.

Hope Avenue

Hope Avenue is a two-lane arterial street that runs from northbound Highway 101 on- and off-ramps at Calle Real to Foothill Road (State Route 192). Hope Avenue changes its street name from North to South Hope Avenue at State Street. The ADT on South Hope Avenue is about 6,800 vehicles. The ADT on North Hope Avenue is 9,300 vehicles. Sidewalks and bicycle lanes run along both sides of Hope Avenue south of State Street. Bike lanes are not present on North Hope Avenue; however, the section between Via

¹ Class II Bike Lane provides a striped lane for one-way bike travel on a street or highway adjacent to auto travel lanes.

Lucero and San Remo Drive is part of the Foothill Route Class III bike route.² The intersection with State Street is controlled by a traffic signal. The speed limit along Hope Avenue is 35 miles per hour.

Hitchcock Way

Hitchcock Way is a two-lane local street that extends north from Calle Real to State Street, and terminates near the project site. Its intersection with State Street is controlled by a traffic signal. The ADT on Hitchcock Way is 6,200 vehicles. Sidewalks and bicycle lanes are on both sides of Hitchcock Way. The speed limit along Hitchcock Way is 30 miles per hour.

Ontare Road

Ontare Road is a two-lane residential street that extends south from Foothill Road across State Street to its terminus at McCaw Avenue. Ontare Road changes its street name from North to South Ontare Road at State Street. The ADT on North Ontare Road is about 5,600 vehicles. The ADT on South Ontare Road is about 2,000 vehicles. The intersection with State Street is controlled by a traffic signal. The speed limit along North Ontare Road is 30 miles per hour.

San Remo Drive

San Remo Drive is a two-lane residential street that runs to the north of and parallel to State Street between North Hope Avenue and North Ontare Road. The ADT is approximately 2,500 to 3,300 vehicles per day. It has on-street parking along most of its length between Hope and Ontare. The street provides direct access to numerous residential lots, single and multi-family dwellings, and has a speed limit of 25 miles per hour. San Remo is a Class III bikeway in the City's Bicycle Master Plan. The intersections with North Hope Avenue and North Ontare Road are both controlled by a two-way stop.

7.3.3 Existing Transit Facilities

The Las Positas Road, La Cumbre Road, and State Street corridors are served by several transit lines operated by the Santa Barbara Metropolitan Transit District (MTD). MTD lines include stops on State Street, Las Positas Road, Calle Real, La Cumbre Road, and Modoc Road. The various bus lines provide frequent transit service between the study area and downtown Santa Barbara, as well as Goleta and UCSB to the west. Line 1 serves La Cumbre Middle School and the eastern portion of Modoc Road. Line 5 serves the Mesa and part of Las Positas Road. Line 3 (Oak Park shuttle), Line 6 (State/Hollister Traveler), and Line 11 (Downtown/UCSB connection) serve the outer State Street and La Cumbre Road area. The nearest bus stops to the project site are located on State Street at Hope Avenue and Ontare Road (towards

² Class III Bike Route provides for shared use with pedestrian or motor vehicle traffic.

Goleta), and on State Street at Hitchcock Way (towards downtown). Lines 3, 6, and 11 stop at these locations. Both the proposed project and applicant's alternative include construction of a new bus stop on the westbound side of State Street adjacent to the proposed hotel or office site.

7.3.4 Existing Bicycle and Pedestrian Facilities

Several bicycle facilities are located within the study area. These include the Class II on-street bike lanes on State Street (State Street Route), Modoc Road, Las Positas Road, La Cumbre Road, and Calle Real. San Remo is part of the Foothill Route Class III bikeway in the City's Bicycle Master Plan.³ Additional bicycle opportunities exist on the residential streets in the local areas.

Currently, pedestrian have use of sidewalks along both sides of State Street. Additionally, metered crosswalks are provided at State Street and Hitchcock west of the site, and at State Street and Ontare Road west of the site.

7.3.5 Existing Traffic Volumes and Operating Conditions

Weekday peak-hour traffic count data for the analyzed intersections was collected from several sources. Data for most of the intersections were provided by the City of Santa Barbara from counts that were conducted in 2008 as part of the Plan Santa Barbara effort. However, the City's 2008 traffic counts did not include data for the intersections along San Remo Drive. Therefore, intersection turning movement counts for these three analyzed intersections (San Remo Drive at Hope Avenue, Grove Lane, and Ontare Road) were conducted. The counts were conducted on Tuesday, November 18, 2008, between 7:00 AM and 9:00 AM, and 4:00 PM and 6:00 PM. The remaining intersection peak-hour turning movement counts, which were not available from the Plan Santa Barbara project, were obtained from either the USSS or from the 2005 ATE traffic study. **Table 7.0-1, Intersection Traffic Count Sources**, lists the analyzed intersections and the traffic count sources. A summary of the counts are provided in the traffic study (**Appendix 7.0**).

Figure 7.0-1, Existing Year 2008 Peak Hour Traffic Volumes, shows the intersection turning movement volumes for the busiest morning and afternoon 1-hour periods at the three intersections.

The existing intersection peak hour LOS' were calculated for the study intersections. The results of the existing conditions intersection analyses are listed in **Table 7.0-2, Existing Intersection Levels of Service**. All of the study intersections were found to be operating at acceptable levels of service during both the

³ City of Santa Barbara, Bicycle Master Plan, adopted October 1998 and updated December 2003.

**Table 7.0-1
Intersection Traffic Count Sources**

Intersection	AM	PM	Intersection	AM	PM
State Street/ La Cumbre Road	City	USSS	Calle Real/Hope Avenue/ US 101 NB Ramps	City	City
State Street/ Hope Avenue	City	City	Calle Real/ Hitchcock Way	ATE	USSS
State Street/ Hitchcock Way	City	City	San Remo Drive/ Hope Avenue	Iteris	Iteris
State Street/ Ontare Road	ATE	USSS	San Remo Drive/ Grove Lane	Iteris	Iteris
State Street/ Las Positas Road	City	City	San Remo Drive/ Ontare Road	Iteris	Iteris

Source: Iteris, 2009.

Notes:

City = 2008 Plan Santa Barbara

Iteris = November 2008 count

USSS = Upper State Street Study 2006

ATE = 2005 project traffic study

**Table 7.0-2
Existing Intersection Levels of Service**

Intersection	Control	AM Peak Hour	PM Peak Hour
		V/C / LOS	V/C / LOS
State Street / La Cumbre Road	Signal	0.60 / LOS A	0.70 / LOS B
State Street / Hope Avenue	Signal	0.51 / LOS A	0.66 / LOS B
State Street / Hitchcock Way	Signal	0.52 / LOS A	0.67 / LOS B
State Street / Ontare Road	Signal	0.43 / LOS A	0.55 / LOS A
State Street / Las Positas Road	Signal	0.64 / LOS B	0.77 / LOS C
Calle Real/Hope Avenue / US 101 NB Ramps	Signal	0.56 / LOS A	0.72 / LOS C
Calle Real / Hitchcock Way	Signal	0.43 / LOS A	0.46 / LOS A
		Delay* / LOS	Delay* / LOS
San Remo Drive / Hope Avenue	2-way Stop	12.5 / LOS B	12.4 / LOS B
San Remo Drive / Grove Lane	All-way Stop	** / LOS A	7.8 / LOS A
San Remo Drive / Ontare Road	2-way Stop	9.3 / LOS A	9.9 / LOS A

Sources: Iteris, 2009

* - Delay measured in seconds per vehicle

** - Delay amount below the minimum threshold of the calculation methodology.

AM and PM peak hours, however the intersection of State Street with Las Positas Road is operating with a V/C ratio of 0.77 (LOS C) during the PM peak hour.

7.4 PROJECT FEATURES

This study evaluates the potential impacts from the proposed project (hotel and residential condominiums) and applicant's alternative (offices and residential condominiums) as described in **Section 3.0, Project Description**.

7.4.1 Proposed Project

The proposed project is a mixed-use development with 106 hotel rooms and 73 residential condominium units (one-, two-, and three-bedroom units). All existing site improvements, including the existing Sandman Inn (113 rooms) and restaurant, would be demolished. Access to the proposed project would be via two driveways located on State Street. The westerly driveway would provide access to the hotel porte cochere, service area, and parking garage access. The easterly driveway would provide access to the residential parking garage.

The existing site has four access driveways along State Street. These provide access to the existing Sandman Inn, restaurant, and Town & County Apartments. The proposed project would reduce the access driveways on State to two, with those driveways serving only the new hotel and condominiums. The westerly driveway would serve the hotel and would be located approximately 250 feet (center-to-center) east of the State/Hitchcock intersection. The easterly driveway would provide access to the residential condominium parking garage and would be located approximately 130 feet (center-to-center) further to the east. The westerly and easterly driveways would be approximately 210 and 340 feet, respectively, from the approach side of the east crosswalk at the Hitchcock intersection.

The westerly driveway is proposed as a right-in/right-out only driveway. Drivers entering the hotel driveway from the west would be required to drive past the site and make a U-turn at the State Street and Ontare Road intersection, as no U-turns are allowed at the eastern end of the existing median. Vehicles leaving the westerly driveway would need to make a U-turn at the State Street and Hitchcock Way intersection if they needed to head east from the site.

The easterly driveway is proposed to allow only right turns for outbound movements, and to allow right and left turns in. This would require alteration of the existing median located on State Street to allow for a left-turn pocket with queuing area. Vehicles leaving the easterly driveway would need to make a U-turn at the State Street and Hitchcock Way intersection if they needed to head east from the site.

Access through the site to the Town & County Apartments, which are located immediately behind the main project site, would be permanently closed. A new access to the apartments would be provided via a driveway connection at 3715 San Remo Drive. Developing this new access would require demolition of one-half of the existing duplex residence on the 3715 San Remo Drive site and modification the easterly driveway on that site to serve the apartments.

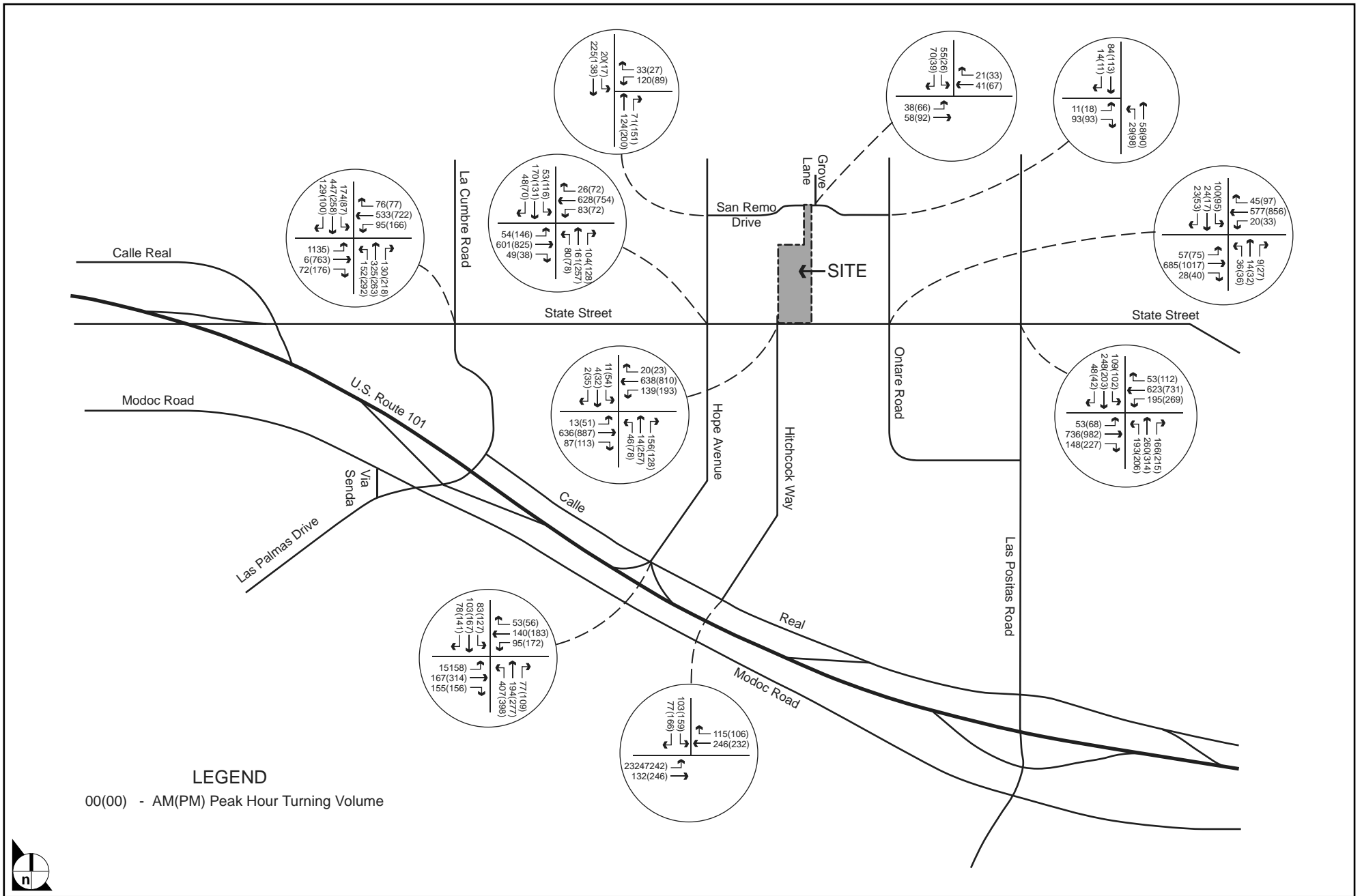
Parking for the proposed project would be provided in two underground parking garages with some additional at-grade parking provided along the access drive to the hotel. The parking garage for the hotel would contain 110 spaces, while the residential parking garage would contain 163 spaces. One hotel space would be located at-grade and 17 shared use spaces would be located at-grade along the hotel access drive.

While the project site has permanent access to four parking spaces on the west side of the site accessed through the adjacent property to the west via an easement agreement (and more during evenings and weekends), because the spaces are not directly accessible on foot from the hotel or residential uses (parkers would need to access the spaces using the sidewalk along State Street), the spaces have not been included in the proposed project's parking total.

In total, the proposed project would have 291 parking spaces with the hotel component having 111 parking spaces, the residential condominiums having 163 spaces, and 17 at-grade spaces would be shared by the hotel and residential condominiums.

7.4.2 Applicant's Alternative

The applicant's alternative is a mixed-use development with 14,254 net square feet of commercial office space contained in two buildings, and 73 residential condominium units (one-, two-, and three-bedroom units). As with the proposed project, the existing Sandman Inn and restaurant would be demolished and the access to the Town & County Apartments would be relocated to a driveway connection off of San Remo Drive.



SOURCE: EIR Traffic Study, Iteris - March 2009

FIGURE 7.0-1

Existing Year 2008 Peak Hour Traffic Volumes

The applicant's alternative would have an access plan similar to the proposed project in that there would be two driveways onto State Street with the westerly driveway providing access to the office building's parking lot and the residential drop-off area, and the easterly driveway accessing the underground parking garage for the residential uses (plus a limited number of reserved office parking spaces).

Parking for the office space would be provided on the north side of the buildings within a surface parking lot (52-spaces), on the entry driveway (9-spaces), and within the residential underground parking area (5-spaces), for a total of 66-spaces. Parking for the residential condos would be provided in a 169-space underground parking garage, with 123 spaces in private garages under some units and the remaining spaces provided in 46 surface spaces. Of the 46 surface spaces, 22 would be reserved for residents, 19 would be open for guest parking, and the remaining 5 spaces would be for the office use as noted above.

In addition, nine shared spaces would be provided along the access driveway to the office buildings and would be open for visitor parking for both the offices and the residential condos. Unlike with the proposed project, the 4 spaces located on west side of the site accessed through the adjacent property to the west via an easement agreement are included in the parking supply total (included as part of the 52-space parking lot) because they would be easily accessible on foot from the office buildings.

In total, the applicant's alternative project will have 239 parking spaces with the office component having 66 parking spaces, the residential condominiums having 164 spaces, and 9 at-grade spaces would be shared by the offices and residential condominiums for visitor parking.

7.5 IMPACT SIGNIFICANCE GUIDELINES

Within the City of Santa Barbara, project-related significant impacts may be caused by the volume of traffic a project generates, the effect of that traffic on area circulation and safety, and/or the amount of parking provided by the project and the level of parking demand generated.

7.5.1 Vehicle Traffic

A project may have a significant impact on if it would:

- Cause an increase in traffic that is substantial in relation to the existing traffic load and street system capacity (see traffic thresholds below),
- Cause insufficiency in transit systems,
- Conflict with the Congestion Management Plan (CMP) or Circulation Element or other adopted plan or policy pertaining to vehicle or transit systems.

The City uses levels of service (LOS) “A” through “F” to describe operating conditions at signalized intersections in terms of volume-to-capacity (V/C) ratios, with LOS A (up to 0.60 V/C) representing free flowing conditions and LOS F (1.01+ V/C) describing conditions of substantial delay. The City General Plan Circulation Element establishes the goal for City intersections to not exceed LOS C (0.70-0.80 V/C).⁴

For purposes of environmental assessment, LOS C at 0.77 V/C is the threshold Level of Service against which impacts are measured. An intersection is considered “impacted” if the volume to capacity ratio is 0.77 V/C or greater.

Project-Specific Significant Impact: A project-specific significant impact results when:

- a) Project peak-hour traffic would cause a signalized intersection to exceed 0.77 V/C, or
- b) The V/C of an intersection already exceeding 0.77 V/C would be increased by 0.01 (1 percent) or more as a result of project peak-hour traffic. For non-signalized intersections, delay-time methodology is utilized in evaluating impacts.

Significant Cumulative Contribution: A project would result in a significant contribution to cumulative traffic impacts when:

- a) Project peak-hour traffic together with other cumulative traffic from existing and reasonably foreseeable pending projects would cause an intersection to exceed 0.77 V/C, or
- b) Project would contribute 5 or more vehicles to an intersection already exceeding 0.77 V/C.

The City’s general plan does not set forth a level of service threshold for unsignalized intersections, nor do the City’s Environmental Impact Evaluation Guidelines. In order to fully disclose the effects of the project on the surrounding circulation system, impacts to unsignalized intersections are provided. Consistent with City practice, the minimum acceptable operating standard for unsignalized intersections is an average vehicle delay of 22 seconds, based on the Highway Capacity Manual (HCM) methodology. A criterion similar to the signalized intersections (an increase of 1 percent to the delay) was applied to the unsignalized intersections to determine a project impact.

7.5.2 Circulation and Traffic Safety

A project may have a significant impact on if it would:

- Create potential hazards due to addition of traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, and/or inadequate pavement structure) or that supports uses that would be incompatible with substantial increases in traffic.

⁴ City of Santa Barbara, *General Plan*, “Circulation Element,” adopted November 1997.

- Diminish or reduce safe pedestrian and/or bicycle circulation.
- Result in inadequate emergency access on-site or to nearby uses.

Specific impact criteria for these points are related to compatibility with adopted City policies and design guidelines. In addition, impacts may be experienced if the features of the proposed project do not include elements identified in applicable area or neighborhood planning or design guidelines. The identification of these items as significant impacts is not as defined as the thresholds above and therefore gives decision-makers more discretion in their final analysis and decision.

7.5.3 Parking

A project may have a significant impact on if it would:

- Result in insufficient parking capacity for the projected amount of automobiles and bicycles.

A significant impact may be experienced if the project does not provide enough on-site parking that meets minimum site design requirements based on the City's Municipal Code,⁵ or may be created if the project generates an excessive amount of new parking demand to a shared parking area.

7.6 METHODOLOGY

The analyses provided in the traffic study (see **Appendix 7.0**) was performed using the methodology followed by the City of Santa Barbara and that is compliant with the California Environmental Quality Act (CEQA).

7.6.1 Analysis Scenarios

Traffic operations analysis for the study area intersections included the following three traffic scenarios:

- "Existing Traffic Conditions" at area intersections during the peak-hour traffic periods based on the existing traffic counts.
- "Future With- and Without Project Traffic Conditions", which includes existing traffic plus traffic growth from general background development and population (ambient) growth in the area. Based on data from the City the ambient growth rate used was 0.5 percent per year for four years (2.0 percent total ambient growth). This assumed full project occupancy in Year 2012.
- "Future Cumulative Traffic With- and Without Project Conditions", which includes existing traffic plus ambient background growth plus traffic from identified approved and pending cumulative

⁵ City of Santa Barbara, Municipal Code, Title 10, Transportation and Parking.

projects in the surrounding City and County areas that would intensify land uses and send additional traffic to area intersections.

For each intersection, the analysis reviewed both the weekday AM and PM peak hours.

7.6.2 Analyses and Levels of Service

Surface street traffic conditions are characterized using LOS ratings of A through F at signalized intersections. LOS ratings for signalized intersections are based on V/C ratios. Volume (V) is the amount of traffic at the intersection compared to Capacity (C), the maximum amount of traffic the intersection is physically designed to accommodate. LOS A (0.00 to 0.60 V/C, up to 60 percent of capacity) represents the best possible free-flow traffic conditions, and LOS F (1.01 plus V/C, or more than 100 percent of capacity) represents very congested or stopped conditions. Typically, at LOS A the motorist does not experience any delay at intersections, while at LOS E and F the motorist will experience substantial delay and may be forced to wait through multiple signal cycles to get through an intersection. **Table 7.0-3, Level of Service Descriptions**, provides a general description of the operating conditions for signalized intersections.

**Table 7.0-3
Level of Service Descriptions**

LOS	Description
A	No approach phase is fully utilized by traffic, and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily, and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized, and a substantial number are nearing full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally, drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.
D	This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is attained no matter how great the demand.
F	This level describes forced flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially, and stoppages may occur for short or long periods of time due to the congestion. In the extreme case, speed can drop to zero.

The City general plan establishes LOS C as its goal and standard for the maximum acceptable peak-hour intersection congestion level during the heaviest daily travel times. LOS C has a range of 71–80 percent of capacity (0.71–0.80 V/C). At LOS C, progression slows, and motorists often must stop at red lights, and possibly a second red light for some turning movements, before getting through the intersection. For purposes of evaluating traffic effects in the environmental assessment of development proposals, the City uses 0.77 V/C as a standard level for identifying intersections that are close to exceeding the LOS C range during peak travel times, and are therefore considered “impacted” intersections.

The Intersection Capacity Utilization (ICU) was formally adopted as the LOS methodology by the City for signalized intersections. The ICU method provides a straightforward method to calculate an intersection’s LOS by taking the sum of each pair of intersection critical movements (conflicting turning movements) and dividing that value by the intersection’s saturation flow rate (capacity). The saturation flow rate for all CMP intersections is 1,600 vehicles per lane per hour. Each critical movement’s volume to capacity ratio is then summed and a 10 percent lost time adjustment is added to this sum to derive the intersection volume to capacity ratio for the peak hour.

The Highway Capacity Manual 2000 (HCM) methodology has been used to determine intersection levels of service at unsignalized intersections. For the unsignalized HCM methodology, the LOS is presented in terms of total approach delay of the minor street (in seconds per vehicle).

The relationship between LOS and the ICU value (i.e., V/C ratio) and delay is listed in **Table 7.0-4, Relationship of LOS to ICU Delay.**

**Table 7.0-4
Relationship of LOS to ICU and Delay**

Level of Service (LOS)	Signalized Intersections	Unsignalized Intersections
	Intersection Capacity Utilization (ICU)	Delay per Vehicle (sec)
A	< 0.60	≤10.0
B	0.61–0.70	>10.0 and ≤15.0
C	0.71–0.80	>15.0 and ≤25.0
D	0.81–0.90	>25.0 and ≤35.0
E	0.91–1.00	>35.0 and ≤50.0
F	> 1.00	>50.0

7.6.3 Trip Generation Rates and Application

Trip Generation Rates

The City of Santa Barbara uses trip generation rates published by the Institute of Transportation Engineers (ITE), when available, for estimating the amount of traffic that will be generated by existing land uses and proposed development projects in conducting traffic analyses. ITE's *Trip Generation, an ITE Informational Report*,⁶ presents trip generation data for 162 different land uses. The data in the report has been collected and refined over many years by ITE and its member traffic engineers. It includes trip rates for various land uses by multiple dependent variables (square footage, employees, dwelling units, rooms, etc.) and for different time periods of the day and week. The data includes statistical information on the amount of variability in the survey data used and land uses in each category surveyed. The average rates presented in the report are a good measure of the expected trip generation for typical developments and are used by many agencies as predictors of development traffic activity and as a basis for traffic planning. For those land uses or time periods where ITE rates are not available, rates from other similar sources such as the San Diego Association of Governments (SANDAG) are used. The use of average trips rates is consistent with general planning practices, including the development of the City's general plan.

Trip Rate Application

For purposes of the environmental analysis, the project related trips assigned to the roadway network includes the peak hour traffic that is projected to be generated by the development proposal using the ITE average trip rates less the trips that would be generated by the existing development to be removed, if any, also using the ITE rates. Since existing entitled development has been planned for and/or approved using average trip rates for that existing use, the difference between the trips generated by the existing and proposed developments identifies the amount of additional or fewer trips that the proposed development would produce on the area roadway network. Since the City of Santa Barbara is essentially a "built-out" community, the comparison of the area wide trips generated by a proposed development to those of an existing development indicates the level to which the proposed redevelopment is consistent with the site's trip generation included in the current general plan.

If trips are added to off-peak hours or during peak hours at locations operating at good levels of service, the additional project traffic will typically not create an impact. At locations that are approaching or already have poor levels of service, the additional trips generated may have a significant impact if enough additional traffic is generated. At intersections that are close to the unacceptable LOS threshold (0.80 and LOS C), the City prevents new development from using the remaining capacity up to the LOS C

⁶ Institute of Transportation Engineers, *Trip Generation, an ITE Informational Report*, 8th Edition.

limit by having the project-specific significant impact threshold at a V/C ratio of 0.77 for environmental review, as previously discussed. This allows for some additional background (ambient) traffic growth to occur without the intersection reaching unacceptable LOS D conditions.

7.6.4 Intersection Analysis Locations

The study area was developed in consultation with City of Santa Barbara Planning and Transportation Division staff and includes intersections in the vicinity of the project. The study area includes the following intersections.

- State Street at La Cumbre Road
- State Street at Hope Avenue
- State Street at Hitchcock Way
- State Street at Ontare Road
- State Street at Las Positas Road
- Calle Real/Hope Avenue at US 101 NB Ramps
- Calle Real at Hitchcock Way
- San Remo Drive at Hope Avenue
- San Remo Drive at Proposed Town & Country Apartment Driveway (future)
- San Remo Drive at Grove Lane
- San Remo Drive at Ontare Road

7.7 IMPACTS

The environmental impact analysis presented below is based on determinations made in the Notice of Preparation (NOP) for issues that were determined to be potentially significant, or for issues identified by reviewing agencies, organizations, or individuals commenting on the NOP that made a reasonable argument that the issue was potentially significant (see **Responses to NOP, Appendix 2.0**).

The Initial Study determined that the proposed project would not result in significant impacts for the following thresholds:

- Emergency access or access to nearby uses, and
- Hazards or barriers for pedestrians or bicyclists.

A discussion of the potential impacts for these effects that were determined not be significant is provided in **Section 11.0** of this EIR.

The Initial Study determined that the proposed project could potentially result in significant impacts for the following threshold:

- Increased vehicle trips,
- Hazards to safety from design features (e.g., sharp curves, inadequate sight distance or dangerous intersections), and
- Insufficient parking capacity on-site or off-site.

7.7.1 Long-term Impacts

This section examines potential long-term impacts that may be generated by either the proposed project or the applicant's alternative plan. These include both project-specific and cumulative impacts. In addition, it will address some comments and questions that were raised during the public review period by City staff, officials, and the public.

It is important to note that the traffic analysis evaluates the impacts of the project assuming no left turns into the site, even though both the proposed project and applicant's alternative include the left-turn access into the easterly driveway. The March 3, 2006, ATE traffic study analyzed an option without left-turn access into the site. That analysis indicated that the option without left-turn access would have the greatest impact on the intersections of State Street with Hitchcock Way and State Street with Ontare Road because of additional site and non-site traffic that would be routed through the intersections making U-turns. Traffic entering the residential portion of the site from the west would need to make a U-turn at the State/Ontare intersection and traffic entering the Burger King to the south would need to make a U-turn at the State/Hitchcock intersection as they would lose left-turn access into their site if the median in front of the Sandman Inn site is closed to left turns.

Therefore, to analyze the option with the greatest potential impact on the adjacent transportation system the analysis presented in this section *does not include left turns into the site* at the easternmost site driveway, and requires that eastbound vehicles turning into the residential driveway would need to travel past the site and make U-turns at Ontare Road to access the residential driveway. All of the eastbound hotel or office traffic would need to make this maneuver as no left turns are allowed at that driveway.

The conclusion from this approach is that if it is shown that the option with no left turns would not have a significant impact at the analyzed intersections, then the option allowing left turns into the Sandman Inn and Burger King sites would also not have a significant impact since fewer vehicles would pass through the State/Hitchcock and State/Ontare intersections as a result of fewer U-turns. The analyses specifically dealing with the operations of the proposed left-turn access and its conformity with the USSS guidelines are presented later in this section.

Vehicle Trips and Traffic Impacts

This analysis provides information on the trip generation estimates for the proposed project and applicant's alternative and potential impacts to the operation of area intersections.

Proposed Project

Proposed Project Trip Generation

The ATE November 2007 trip generation analysis presented a trip generation estimate for the existing site and the proposed project. **Table 7.0-5, Project Trip Generation Comparison**, lists a summary of that trip generation estimate. Findings of that analysis concluded that development of the proposed project would result in 216 fewer daily trips, 25 additional AM peak hour trips, and 5 fewer PM peak hour trips than the existing uses. The trip estimates were based on rates in the ITE's *Trip Generation*, 7th Edition, which was current at the time. A review of the trip generation analysis indicates that it was done in accordance with City standards and that the trip rates used were appropriate.

**Table 7.0-5
Project Trip Generation Comparison**

Land Use	Size	Daily		AM Peak Hour		PM Peak Hour	
		Rate	Trips	Rate	Trips	Rate	Trips
A. Existing Site							
Motel	113 Rooms	9.11	1,029	0.64	72	0.58	66
Restaurant	196 Seats	2.86	561	0.03	6	0.26	51
T&C Apartments	24 Units	6.72	161	0.51	12	0.62	15
<i>Total</i>			1,751		90		132
B. Project							
Hotel	106 Rooms	8.92	946	0.67	71	0.70	74
Condominiums	73 Units	5.86	428	0.44	32	0.52	38
T&C Apartments	24 Units	6.72	161	0.51	12	0.62	15
<i>Project Total</i>			1,535		115		127
Net Difference (B-A)			-216		+25		-5

Source: Associated Traffic Engineers, 2007.

Proposed Hotel Trip Generation

Comments during the public scoping period for the proposed project questioned whether trips generated by the new hotel use were adequately captured given the new hotel would include banquet and meeting space. ITE's *Trip Generation* lists Hotels as "... places of lodging that provide accommodations and supporting facilities such as restaurants, cocktail lounges, meeting and banquet rooms or convention facilities, limited recreational facilities (pool, fitness room), and/or other retail/service shops. Some of the sites included in this land use category are actually large motels providing the facilities of a hotel noted above"⁷ Based on this description, activity from the small conference area (approximately 5,000 square feet) would be included in the trip generation for the proposed project using the ITE trip rates⁸. While it would be normal for the activity level of the conference area to fluctuate from day to day, the activity for a "typical" weekday would be included in the trip generation estimates for the proposed project. Therefore, no additional trip generation beyond the ITE per room Hotel trip rate is required to determine the proposed project's daily and peak hour trip generation for a typical weekday.

Town and County Apartment Trip Generation

To confirm the number of trips from the existing apartments that would be diverted to San Remo Drive as part of the proposed project or the applicant's alternative; a multi-day traffic count was conducted for the existing apartments. Currently, all vehicle traffic to and from the apartments must travel along the single access point located at the southeast corner of the apartments. A machine traffic counter was placed at that location and counted trips in to and out of the apartments over a 48-hour period covering Tuesday and Wednesday, November 18 and 19, 2008. The counter recorded a total of 154 total vehicles at the driveway on Tuesday and 162 vehicles on Wednesday. Based on these counts the apartments have an average daily generation of 158 trips per day $(\{154 + 162\} \div 2 = 158)$. The ITE average rate for Apartments (Land Use 220) estimates the apartments would generate 161 trips per day. The ITE average rate for Low Rise Apartments (Land Use 221) estimates the apartments would generate 158 trips per day. Based on the traffic counts and the trip rate review either ITE apartment rate appears to provide an accurate estimation of the existing Town & County Apartment trips. For the trip generation analysis, ITE Land Use 221 (Low Rise Apartments) was used.

⁷ Institute of Transportation Engineers, *Trip Generation*, 7th Edition, 2003, 541

⁸ It should be noted that the existing hotel includes approximately 2,261 square feet of meeting/conference/banquet space, thus making the net increase in meeting space approximately 2,739 square feet.

Proposed Project Trip Distribution

To determine the project-specific impacts at the analyzed intersections, traffic from the proposed project, including the relocated access driveway for the Town & County Apartments, was assigned to the area street system.

Trip distribution percentages were determined based on input from City staff as well as data contained in other local area traffic studies and a general knowledge of the traffic patterns in the local area. The distribution is consistent with that presented in the ATE 2005 traffic study. The project trip distribution percentages are illustrated in **Figure 7.0-2, Project Traffic Directional Distribution** and listed in **Table 7.0-6, Project Trip Distribution**. Separate trip distribution models were developed for existing and proposed uses.

**Table 7.0-6
Project Trip Distribution**

Route	Origin/Destination	Existing Site Conditions Percentage	Proposed Site Conditions Percentage
US Highway 101	North	10%	30% ^a
	South	10%	30% ^b
	East	25%	15%
State Street	West	15%	10%
	Local	15%	7% ^c
La Cumbre Road	South	5%	2.5%
Las Positas Road	South	5%	2.5%
San Roque area	Local	15%	3%
	Total	100%	100%

Notes:

a 50% outbound via US 101 ramp at Hope Ave.; 50% outbound via U.S.101 ramp at State St. 100% inbound via US 101 ramp at La Cumbre Road interchange.

b 50% outbound via US 101 ramp at La Cumbre; 50% outbound via 101 ramps at Las Positas. 100% inbound via US 101 ramp at Hope Avenue.

c Origin/destination along State Street between La Cumbre Road and Las Positas Road.

Proposed Project Trip Assignment

The traffic generated by the existing and proposed site uses was assigned to the study-area street system based on the percentages shown above. The existing site volumes were subtracted from the proposed project-added volumes to determine the net-added traffic at the study-area intersections. The results are illustrated in **Figure 7.0-3, Net Project Peak Hour Traffic Volumes**. Figures

illustrating the distribution of the trips generated by the existing and proposed project uses are included in the traffic study (**Appendix 7.0**).

The total future with-project intersection peak-hour traffic volumes are illustrated in **Figure 7.0-4, Total Future with Project Peak Hour Traffic Volumes**. These volumes include existing traffic, ambient background traffic growth and the net change in site-generated traffic with the proposed project.

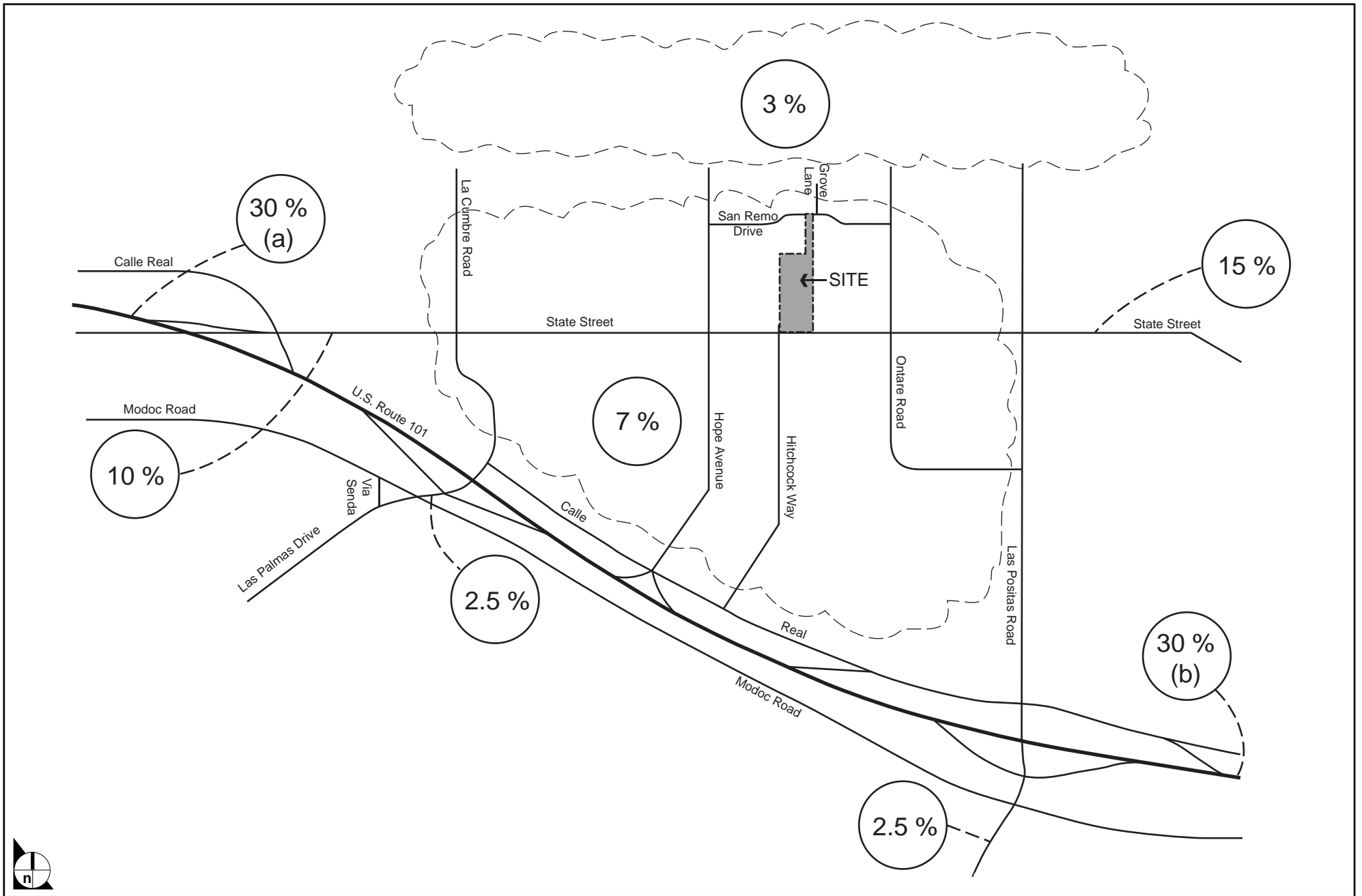
Proposed Project - Specific Impacts

Levels of service were calculated for the analyzed intersections for the AM and PM peak hours of the Future Plus Project condition for the proposed project. The Future Plus Project condition includes existing traffic volumes, the net change in site traffic with the proposed project, and ambient background traffic growth for the years between existing (2008) and the project completion year (2012). The total ambient growth rate for the four-year period is 2 percent (0.5 percent per year). **Table 7.0-7, Future Plus Proposed Project Intersection Levels of Service**, lists the results of the Future Plus Project LOS calculations.

The results of the intersection analyses show that the State Street and Las Positas Road/San Roque Road intersection is expected to operate at a V/C above 0.79 during the PM peak hour. However, as shown in **Table 7.0-7**, the increase from the existing V/C of 0.77 to 0.79 is related entirely to ambient traffic growth, not the proposed project. As previously shown in **Figure 7.0-3**, the project is expected to generate a net reduction in trips at the State Street and Las Positas Road/San Roque Road intersection during the PM peak hour.

While the proposed project is expected to generate an additional 25 AM peak hour trips versus the existing development, all of the analyzed intersections are projected to operate at acceptable levels of service during the AM peak hour. Therefore, based on the City's impact thresholds, the proposed project would not have any significant project-related impacts at the analyzed intersections.

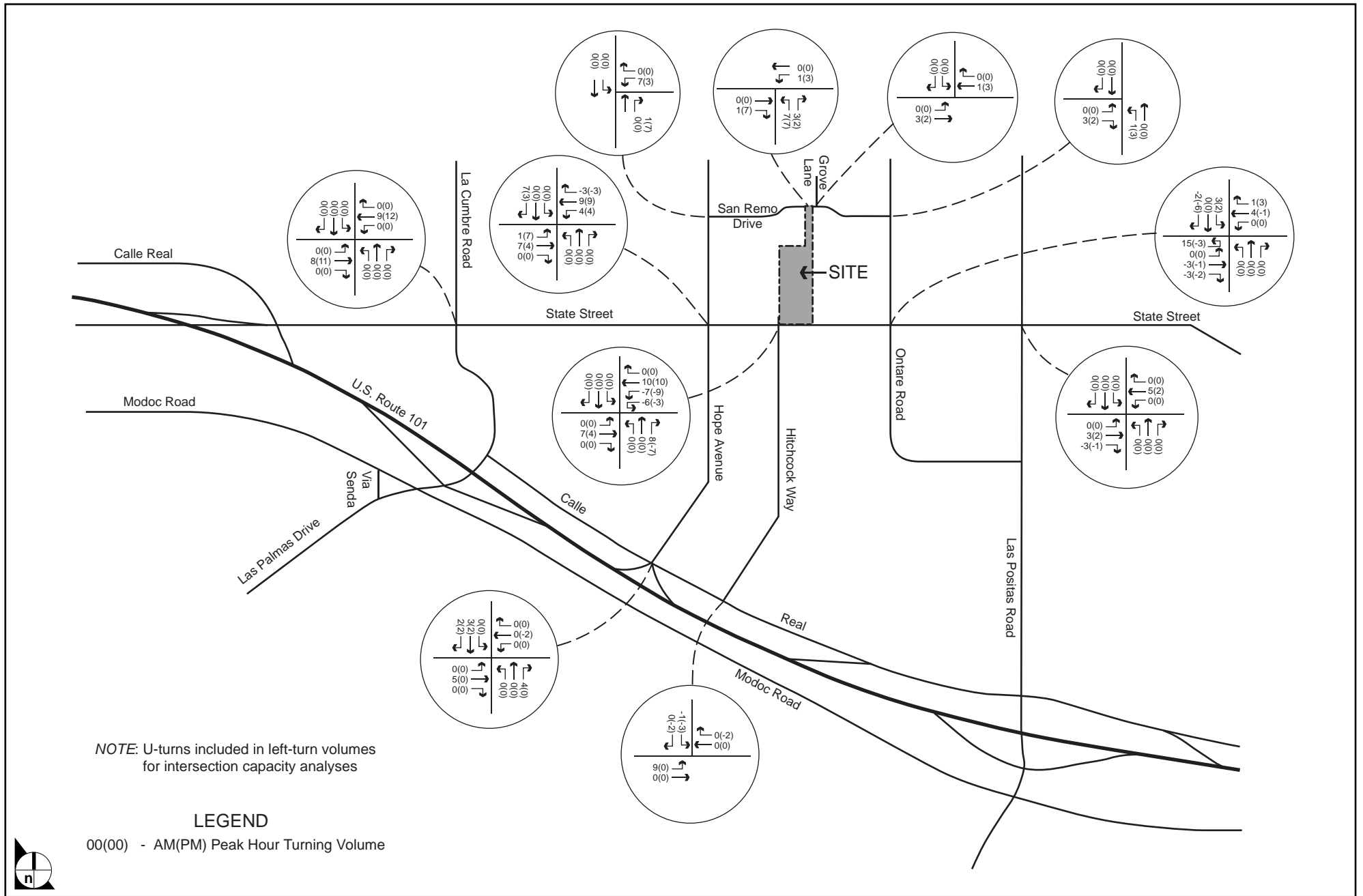
It is important to note again that these analysis results do not include the proposed project's inbound left-turn access at the proposed residential driveway. Operational conditions and issues related to the left-turn access are included below in **On-Street Circulation**.



SOURCE: EIR Traffic Study, Iteris - March 2009

FIGURE 7.0-2

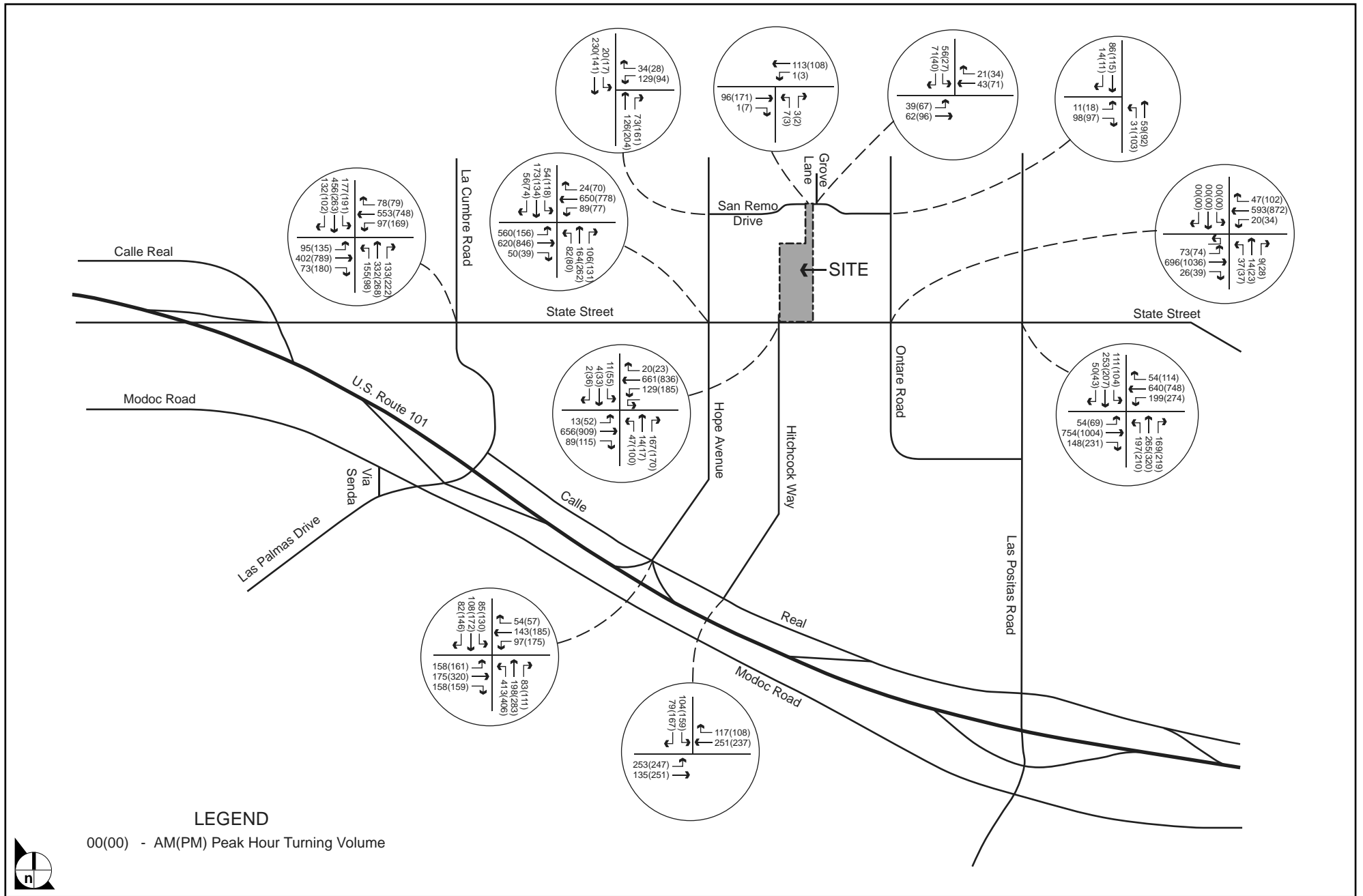
Project Traffic Directional Distribution



SOURCE: EIR Traffic Study, Iteris - March 2009

FIGURE 7.0-3

Net Project Peak Hour Traffic Volumes



SOURCE: EIR Traffic Study, Iteris - March 2009

FIGURE 7.0-4

Total Future with Project Peak Hour Traffic Volumes

**Table 7.0-7
Future Plus Proposed Project^a Intersection Levels of Service**

Intersection	V/C or Delay ^b / LOS		Diff.	Impact?
	Existing	Future Plus Project		
AM Peak Hour				
State Street / La Cumbre Road	0.60 / LOS A	0.62 / LOS B	0.02	No
State Street / Hope Avenue	0.51 / LOS A	0.53 / LOS A	0.02	No
State Street / Hitchcock Way	0.52 / LOS A	0.57 / LOS A	0.05	No
State Street / Ontare Road	0.43 / LOS A	0.46 / LOS A	0.03	No
State Street / Las Positas Road	0.64 / LOS B	0.65 / LOS B	0.01	No
Calle Real/Hope Avenue / US 101 NB Ramps	0.56 / LOS A	0.58 / LOS A	0.02	No
Calle Real / Hitchcock Way	0.43 / LOS A	0.45 / LOS A	0.02	No
San Remo Drive / Hope Avenue	12.5 ^b / LOS B	12.8 ^b / LOS B	0.3	No
San Remo Drive / T&C Apt. Access Drive	N/A	9.4 ^b / LOS A	N/A	No
San Remo Drive / Grove Lane	^c / LOS A	7.7 ^b / LOS A	^c	No
San Remo Drive / Ontare Road	9.3 ^b / LOS A	9.3 ^b / LOS A	0.0	No
PM Peak Hour				
State Street / La Cumbre Road	0.70 / LOS B	0.71 / LOS C	0.01	No
State Street / Hope Avenue	0.66 / LOS B	0.68 / LOS B	0.02	No
State Street / Hitchcock Way	0.67 / LOS B	0.73 / LOS C	0.06	No
State Street / Ontare Road	0.55 / LOS A	0.59 / LOS A	0.04	No
State Street / Las Positas Road	0.77 / LOS C	0.79 / LOS C	0.02	No ^d
State Street / Las Positas Road – without ambient growth		0.77 / LOS C	0.00	No
Calle Real/Hope Avenue / US 101 NB Ramps	0.72 / LOS C	0.76 / LOS C	0.04	No
Calle Real / Hitchcock Way	0.46 / LOS A	0.50 / LOS A	0.04	No
San Remo Drive / Hope Avenue	12.4 ^b / LOS B	12.6 ^b / LOS B	0.2	No
San Remo Drive / T&C Apt. Access Drive	N/A	9.7 / LOS A	N/A	No
San Remo Drive / Grove Lane	7.8 ^b / LOS A	7.9 ^b / LOS A	0.1	No
San Remo Drive / Ontare Road	9.9 ^b / LOS A	9.9 ^b / LOS A	0.0	No

Sources: Iteris, 2009

a – The results presented do not include the applicant's proposed left-turn access into the easterly site driveway.

b - Delay measured in seconds per vehicle

c - Delay amount below the minimum threshold of the calculation methodology.

d - Volumes for proposed project are less than the existing development at this intersection. All of the V/C increase is related to background growth and not to the Project traffic. Therefore, there would be no project-specific impact.

The results listed in **Table 7.0-7**, show that that the intersections along San Remo Drive will continue to operate at acceptable levels of service with the proposed project. In addition to the limited increase in traffic, the vehicles being diverted to San Remo Drive would be all residential traffic, which is consistent with the other traffic using San Remo Drive.

Traffic at the analyzed intersections is expected to operate at acceptable levels-of-service after completion of the proposed project for both the AM and PM peak hours. Therefore impacts would be *less than significant* (Class III).

Project Traffic Additions to San Remo Drive

The proposed project would provide access for the Town & County Apartments via a new driveway connection to San Remo Drive. This access connection would divert to San Remo Drive approximately 103 daily, 8 AM, and 11 PM peak-hour trips west of the proposed access and approximately 56 daily, 4 AM, and 5 PM peak-hour trips east of the proposed access as previously shown in **Figure 7.0-3**. This increase represents an approximate 2 to 3 percent increase in daily traffic along San Remo Drive. The addition of Town & County Apartments traffic to San Remo Drive would not generate impacts according to the City's traffic impact thresholds. Therefore, impacts would be *less than significant* (Class III).

Applicant's Alternative

This section examines potential long-term impacts that may be generated by the applicant's alternative. Since completion of the Initial Study, an alternative land use plan has been presented that replaces the hotel use in the proposed project with two office buildings with a total square footage of just less than 15,000 square feet.

As was noted in the previous section for the proposed project, the analysis presented in this section does not include left turns into the site at the residential (easterly) site driveway, and requires that eastbound vehicles turning into the residential driveway would need to travel past the site and make U-turns at Ontare Road to access the residential driveway. All of the eastbound site-related office traffic would need to make this maneuver as no left turns are allowed at that driveway.

Applicant's Alternative Trip Generation

A trip generation estimate for the applicant's alternative plan was presented in the ATE November 2007 trip generation analysis memorandum. **Table 7.0-8, Applicant's Alternative Project Trip Generation Comparison**, lists the trip rates and projected site traffic generation for the applicant's alternative compared to the existing uses and the proposed project (see analysis above). As shown in

the table, the applicant's alternative would generate fewer daily and peak-hour trips than either existing conditions or the proposed project. A review of the trip generation analysis indicates that it was done in accordance with City standards and that the trip rates used were appropriate.

Applicant's Alternative Trip Distribution

Trip distribution percentages were determined based on input from City staff as well as data contained in other local area traffic studies and a general knowledge of the traffic patterns in the local area. The distribution is the same as for the proposed project and consistent with that presented in the ATE 2005 traffic study. The project trip distribution percentages are illustrated in **Figure 7.0-2** and listed in **Table 7.0-6**.

**Table 7.0-8
Applicant's Alternative Project Trip Generation Comparison**

Land Use	Size	Daily		AM Peak Hour		PM Peak Hour	
		Rate	Trips	Rate	Trips	Rate	Trips
A. Existing Site							
Motel	113 Rooms	9.11	1,029	0.64	72	0.58	66
Restaurant	196 Seats	2.86	561	0.03	6	0.26	51
T&C Apartments	24 Units	6.72	<u>161</u>	0.51	<u>12</u>	0.62	<u>15</u>
<i>Total</i>			1,751		90		132
B. Applicant's Alternative							
Office	15,000 SF	20.64	310	2.74	41	3.06	46
Condominiums	73 Units	5.86	428	0.44	32	0.52	38
T&C Apartments	24 Units	6.72	<u>161</u>	0.51	<u>12</u>	0.62	<u>15</u>
<i>Project Total</i>			899		85		99
Net Difference to Existing (B-A)			-852		-5		-33
C. Proposed Project Trips (refer to Table 5 above)				1,535		115	127
Net Difference Compared to Proposed Project (B-C)				-636		-30	-28

Source: "Revised Trip Generation Analysis for the Sandman Inn Project," November 13, 2007, Associated Traffic Engineers

Applicant's Alternative Trip Assignment

The traffic generated by the existing and proposed site uses was assigned to the study-area street system based on the percentages shown in **Table 7.0-6**. Figures illustrating the distribution of the trips generated by the existing and applicant's alternative's uses are included in the traffic study (**Appendix 7.0**).

Applicant's Alternative Project Specific Impacts

Since the applicant's alternative generates fewer trips than the proposed project and the proposed project was shown to have less than significant project-specific impacts (Class III), it follows that the applicant's alternative would also have *less than significant* (Class III) project-specific impacts at the analyzed intersections.

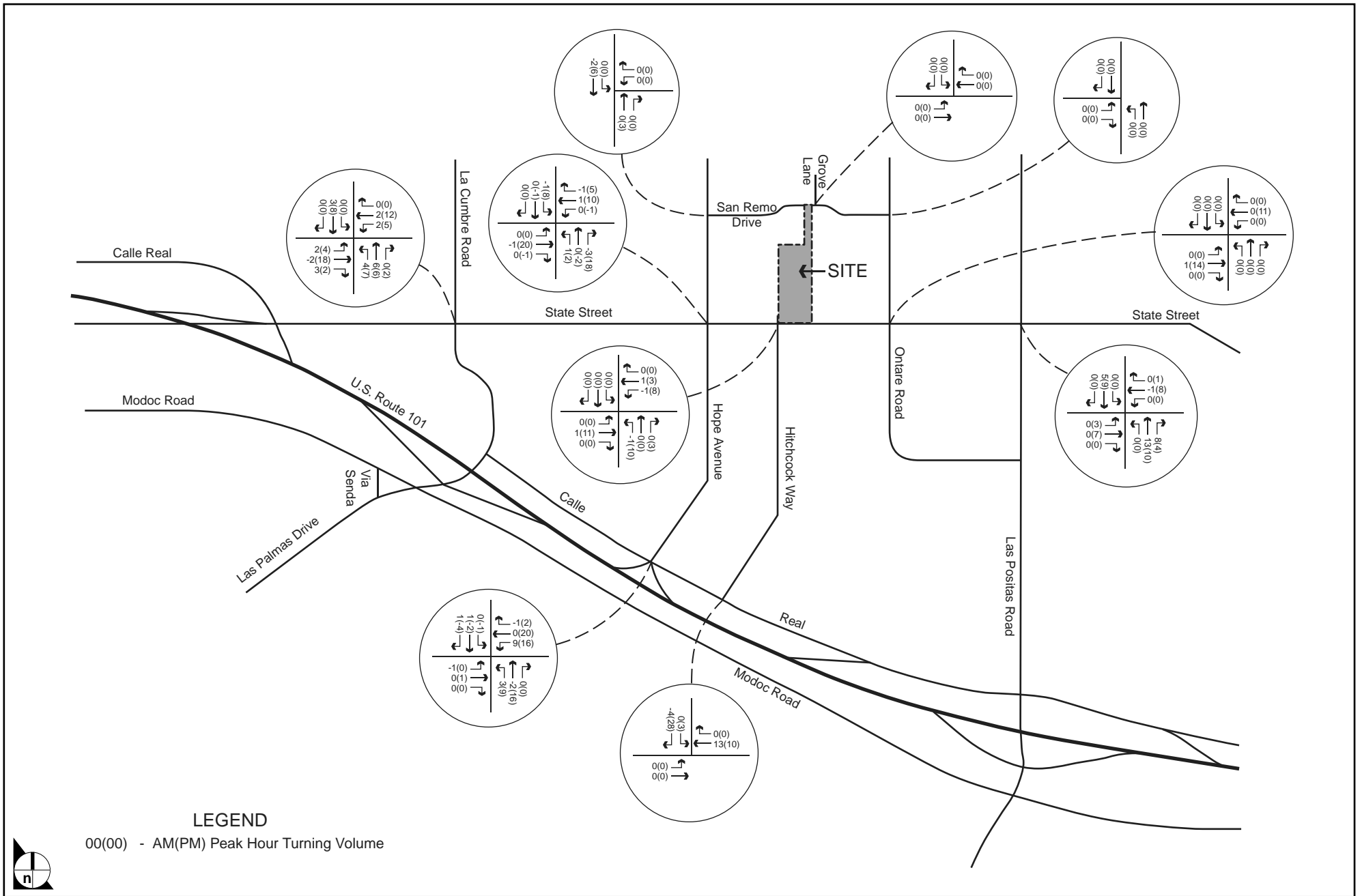
Cumulative Impacts

Tables 4.0-1 and 4.0-2 list all of the pending and approved projects identified by the City as being located near the project site, as well as a breakdown of those projects that were directly added to the cumulative traffic analysis. Some of the projects on the City's list were concluded to add only a few trips to the overall transportation system in the study area or were deemed to be too far from the project to add a substantial number of trips to the analyzed intersections—typically projects more than 1 mile from the project site. Traffic from these developments was accounted for by increasing the existing traffic volumes by the ambient growth rate as previously discussed.

Trip generation estimates for the approved and pending projects were developed using the ITE trip rates. A summary of the trip generation for each of the cumulative projects included in the traffic assignment is included in the traffic study (**Appendix 7.0**). The trip generation data indicates that the approved and pending projects would generate 4,503 daily, 263 AM peak-hour, and 378 PM peak-hour trips.

The cumulative project traffic was assigned to the analyzed intersections based on directional distribution information provided in the ATE 2005 report and in the USSS. The assigned cumulative traffic volumes at the intersections are presented in **Figure 7.0-5, Cumulative Project Peak Hour Traffic Volumes**.

Ambient background traffic growth was added for a period of four years (until 2012 when the project would be built and occupied) as in the project-specific analysis above.



SOURCE: EIR Traffic Study, Iteris - March 2009

FIGURE 7.0-5

Cumulative Project Peak Hour Traffic Volumes

Proposed Project Cumulative Impacts

The total future year cumulative traffic volumes for the without proposed project condition are illustrated in **Figure 7.0-6, Total Future Cumulative Peak Hour Traffic Volumes Without Proposed Project**.

The future volumes with the proposed project are illustrated in **Figure 7.0-7, Total Future Cumulative Peak Hour Traffic Volumes With Proposed Project**.

The LOS analyses for the analyzed intersections with the cumulative projects were conducted for the with- and without-proposed project conditions and the results are listed in **Table 7.0-9, Future Plus Project Plus Cumulative Intersection Levels of Service**. As shown, proposed project related cumulative impacts would be *less than significant* (Class III) impacts at the analyzed intersections.

**Table 7.0-9
Future Plus Project^a Plus Cumulative Intersection Levels of Service**

Intersection	V/C or Delay ^b / LOS		Diff.	Impact?
	Future W/O Project	Future Plus Project		
AM Peak Hour				
State Street / La Cumbre Road	0.62 / LOS B	0.62 / LOS B	0.00	No
State Street / Hope Avenue	0.52 / LOS A	0.53 / LOS A	0.01	No
State Street / Hitchcock Way	0.53 / LOS A	0.57 / LOS A	0.04	No
State Street / Ontare Road	0.44 / LOS A	0.46 / LOS A	0.02	No
State Street / Las Positas Road	0.66 / LOS B	0.66 / LOS B	0.00	No
Calle Real/Hope Avenue / US 101 NB Ramps	0.58 / LOS A	0.59 / LOS A	0.01	No
Calle Real / Hitchcock Way	0.44 / LOS A	0.46 / LOS A	0.02	No
San Remo Drive / Hope Avenue	12.7 ^b / LOS B	12.8 ^b / LOS B	0.1	No
San Remo Drive / T&C Apt. Access Drive	N/A	9.4* / LOS A	N/A	No
San Remo Drive / Grove Lane	7.7 / LOS A	7.7 ^b / LOS A	0.0	No
San Remo Drive / Ontare Road	9.3 ^b / LOS A	9.3 ^b / LOS A	0.0	No

Intersection	V/C or Delay ^b / LOS		Diff.	Impact?
	Future W/O Project	Future Plus Project		
PM Peak Hour				
State Street / La Cumbre Road	0.72 / LOS C	0.72 / LOS C	0.00	No
State Street / Hope Avenue	0.67 / LOS B	0.69 / LOS B	0.02	No
State Street / Hitchcock Way	0.70 / LOS B	0.74 / LOS C	0.04	No
State Street / Ontare Road	0.57 / LOS A	0.60 / LOS A	0.03	No
State Street / Las Positas Road	0.79 / LOS C	0.79 / LOS C	0.00	No ^c
Calle Real/Hope Avenue / US 101 NB Ramps	0.75 / LOS C	0.76 / LOS C	0.01	No
Calle Real / Hitchcock Way	0.51 / LOS A	0.52 / LOS A	0.01	No
San Remo Drive / Hope Avenue	12.6 ^b / LOS B	12.7 ^b / LOS B	0.1	No
San Remo Drive / T&C Apt. Access Drive	N/A	9.7 / LOS A	N/A	No
San Remo Drive / Grove Lane	7.8 ^b / LOS A	7.9 ^b / LOS A	0.1	No
San Remo Drive / Ontare Road	9.9 ^b / LOS A	9.9 ^b / LOS A	0.0	No

Sources: Iteris, 2009

a – The results presented do not include the applicant's proposed left-turn access into the easterly site driveway.

b - Delay measured in seconds per vehicle

c - Volumes for proposed project are less than the existing development at this intersection. All of the V/C increase is related to background growth and not to the Project traffic. Therefore, there would be no project-specific impact.

Applicant's Alternative Cumulative Impacts

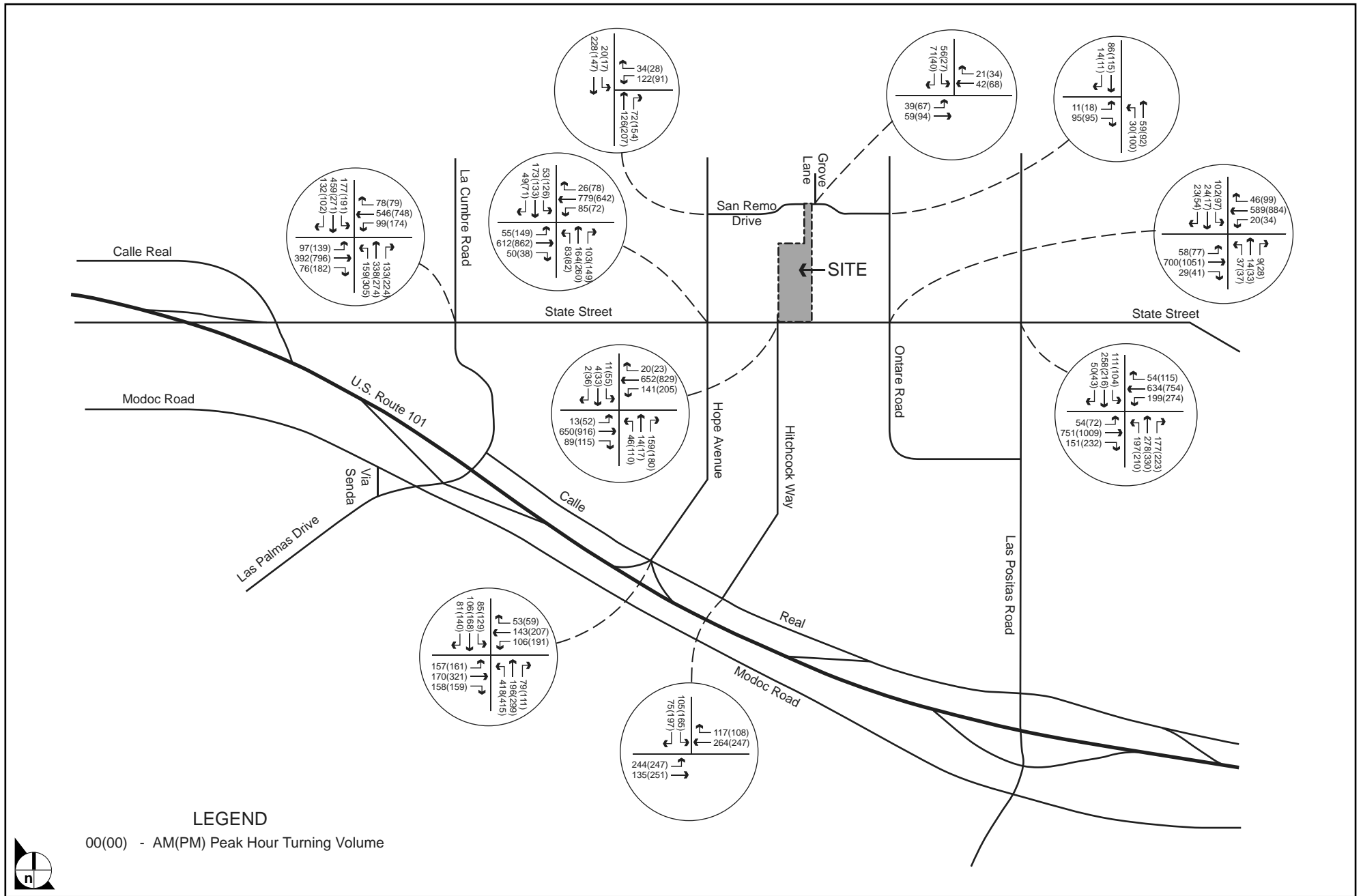
Since the applicant's alternative generates fewer trips than the proposed project, and the proposed project was shown to have less than significant (Class III) cumulative impacts, the applicant's alternative also would have *less than significant* (Class III) cumulative impacts at the analyzed intersections.

Summary of Vehicle Trips and Traffic Impacts

Proposed Project

The proposed project would result in the following impacts:

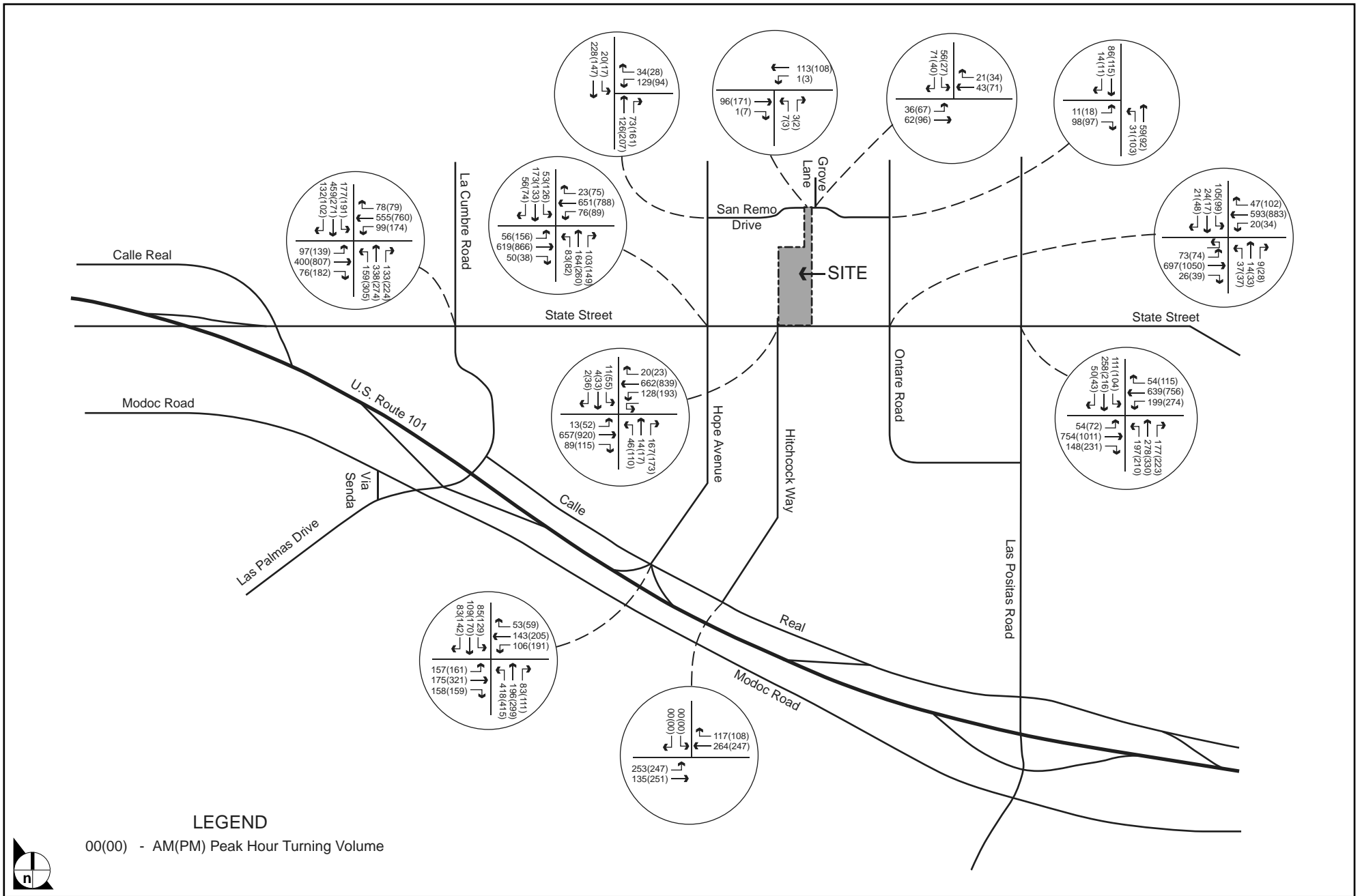
- The intersection capacity analyses indicate that, based on the City's significance criteria, the proposed project impacts would be *less than significant* (Class III) at all of the analyzed intersections for both the project-specific and cumulative scenarios.



SOURCE: EIR Traffic Study, Iteris - March 2009

FIGURE 7.0-6

Total Future Cumulative Peak Hour Traffic Volumes Without Proposed Project



SOURCE: EIR Traffic Study, Iteris - March 2009

FIGURE 7.0-7

Total Future Cumulative Peak Hour Traffic Volumes With Proposed Project

- The intersection of State Street with Las Positas Road/San Roque Road is expected to experience an increase in the V/C ratio during the PM peak hour from the existing V/C ratio of 0.77 to 0.79, above the significance threshold. However, the proposed project would have a net reduction in trips during the PM peak hour period at this intersection and does not increase projected V/C ratio. Therefore, the increase is related solely to ambient and/or future traffic growth and not the proposed project. This means the proposed project would have *no impact* at this intersection during the PM peak hour for either the project-specific or cumulative scenarios.
- The 25 additional AM peak hour trips generated by the proposed project would not cause any intersections to reach or exceed the V/C threshold of 0.77 as all of the analyzed intersections are projected to operate at LOS A or B during the AM peak hour. Therefore, the proposed project impacts would be *less than significant* (Class III) at these intersections.
- While allowing eastbound left turns into the residential driveway would improve operating conditions at the intersections of State Street with Ontare Road and State Street with Hitchcock Way by reducing the number of U-turns at these intersections, restricting the left turns would not create unacceptable operating conditions at either intersection
- The proposed project would provide access to the Town & County Apartments via a new driveway connecting to San Remo Drive. Increases to traffic along San Remo Drive are estimated to increase approximately two to three percent. Impacts would be *less than significant* (Class III).

Applicant's Alternative

The applicant's alternative would result in the following impacts:

- Since the applicant's alternative generates fewer trips than the proposed project, and the proposed project was shown to have less than significant project-specific and cumulative impacts, it follows that the applicant's alternative would also have *less than significant* (Class III) project-specific and cumulative impacts at the analyzed intersections.
- As with the proposed project, the applicant's alternative allows eastbound left turns into the residential driveway. While allowing eastbound left turns into the residential driveway would improve operating conditions at the intersections of State Street with Ontare Road and State Street with Hitchcock Way by reducing the number of U-turns at these intersections, restricting the left turns would not create unacceptable operating conditions at either intersection.
- The applicant's alternative would provide access to the Town & County Apartments via a new driveway connecting to San Remo Drive. Increases to traffic along San Remo Drive are estimated to increase the same as for the proposed project (approximately two to three percent). Impacts would be *less than significant* (Class III).

On-Street Circulation

The proposed project and applicant's alternative both propose to allow eastbound left turns from State Street into the residential (easterly) driveway, and to restrict egress turning movements from both driveways to right turn only. This would be accommodated by modifying the existing raised median

along the site frontage on State Street to create an eastbound left-turn pocket at the residential driveway with a short queuing area. The median opening would also align with the Burger King driveway on the south side of State Street.

As noted above, the vehicle trips and traffic impacts analysis conducted for this study and presented in the previous section (**Section 7.7.1.1**) does not include left turns into the site at the easterly site driveway, and requires eastbound vehicles turning into the residential driveway to travel past the site and make U-turns at Ontare Road to access the residential driveway. Eastbound traffic entering the project site's commercial (westerly) driveway (for either the proposed project or the applicant's alternative) would need to make this maneuver as well because no left turns would be allowed into this driveway.

Previous Analyses

Previous traffic studies⁹ analyzed access alternatives to the site and noted that to provide the proposed left-turn lane the existing median would be modified and the residential driveway and the Burger King driveways would align and left-turns could be more easily made into both sites. These studies also noted that if the raised median is extended eastward, as included in the USSS guidelines, and left-turns into the Sandman Inn site and into the Burger King site were no longer allowed, westbound traffic entering Burger King would be required to make a U-turn at the Ontare Road/State Street and Hitchcock Way/State Street intersections and eastbound traffic entering the Sandman Inn residential driveway would be required to make a U-turn at the State Street/Ontare Road intersection. However these additional U-turning vehicles would not result in any significant degradation in levels of service. The overall conclusion from the previous studies was that allowing the left-turn movement into the easternmost driveway was operationally feasible and would have no significant impacts on traffic operations.

The existing and proposed median configurations are illustrated in **Figure 7.0-8, Existing and Proposed Project Access Driveways and Median Configuration**.

~~The proposed project and applicant's alternative would result in less than significant impacts (Class III) with regards to on-street circulation along State Street.~~

Mid-Block Left-Turn Driveway Access

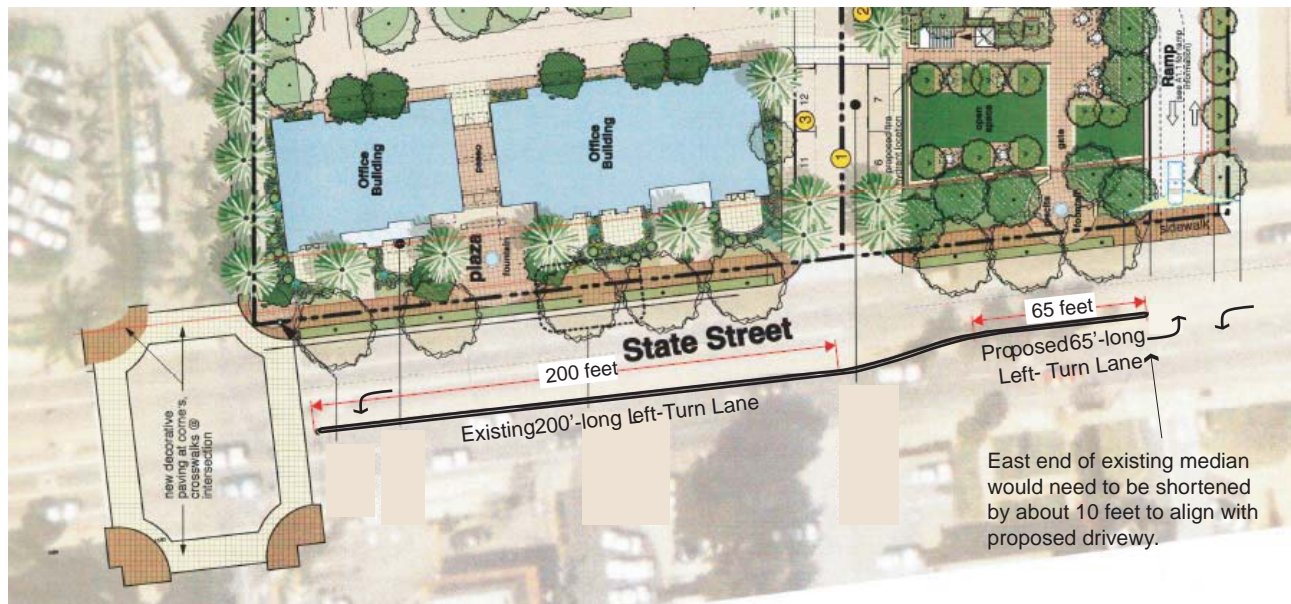
The analyses results presented in **Section 7.7.7.1** does not include the applicant's proposed inbound left-turn access to the residential driveway for either the proposed project or applicant's alternative. This section presents a detailed discussion and analysis of the proposed left-turn lane design and its potential impact on roadway operations.

⁹ ATE's 2005 Traffic and Circulation Study and ATE's 2006 Supplemental Analysis of the Access Alternatives.

Existing Raised Median at the State Street and Hitchcock Way Intersection



Proposed Raised Median Modification With Eastbound Left-Turn Lane at Sandman Site



SOURCE: EIR Traffic Study, Iteris - March 2009

FIGURE 7.0-8

Existing and Proposed Project Access Driveways and Median Configuration

Left-Turn Lane Design and Operation

A left-turn lane at the residential driveway is proposed for either the proposed project or applicant's alternative, and would be developed directly behind (to the east of) the existing westbound left-turn lane for the Hitchcock Way/State Street intersection. Using a median width of about 2 feet, a turn lane with approximately 65 feet of storage space could be developed; this length does not include the length of the transition taper. For planning purposes, this turn lane could accommodate two to three cars (using a standard length of 25 feet per car) without queuing into the adjacent through lanes (assumes one car creeps into the median opening and one car is partially stored in the taper area). To provide the proposed left-turn lane, the existing raised median would need to be shortened by approximately 10 feet to align with the proposed residential driveway.

Even with the turn lane, U-turns would still not be allowed at this location because of both the proximity to the Hitchcock Way/State Street intersection, and because westbound State Street is not wide enough for most vehicles to make a U-turn in a single maneuver.

The eastern end of the existing median is posted for no U-turns. The "No U-Turn" sign would need to remain in order to prevent mid-block U-turns on eastbound State Street. However, the proposed median would not be wide enough to place the "No U-Turn" sign; a width of at least 3 feet is required to avoid damage to passing cars and/or downed signs. At locations where a sign is required but the median is too narrow, such as the eastbound approach at the State Street/Hitchcock Way intersection, the sign is posted overhead on a mast arm (see **Figure 7.0-9, Existing No U-Turn Signage**).

While the proposed left-turn lane could be physically developed, the lane would provide minimal storage capacity and would create a raised median width too narrow to place the necessary control sign. This reduces the desirability and feasibility of the turn lane as proposed. In addition, creating the eastbound left-turn pocket would eliminate the ability to provide median landscaping, another goal to improve corridor aesthetics.

Controlling U-turns at this location will be difficult for hotel or office traffic as some patrons/tenants will likely not want to travel to Ontare Road to make a U-turn when the median opening is close to the site's commercial (westerly) driveway. If all of the vehicles entering the non-residential driveway from the west were to make a U-turn at this opening, as many as 54 additional vehicles could attempt to make turns at the opening during AM peak hour, although it is anticipated that the actual number would be less.

The USSS guidelines recommend extending the existing raised median along State Street between Hitchcock Way and Ontare Road. The additional raised medians would be beneficial to improving the flow of through traffic between Hitchcock Road and Ontare Road. The concept plan presented in the USSS shows one median opening provided between Hitchcock Way and Ontare Road, but it is located about midway between the intersections. Where a mid-block left-turn access is provided along State

Street between the signalized intersections, the preferred location is at a location about midway between the traffic signals to minimize any impacts on the left turns from queues at the downstream traffic signals and at locations where a large volume of left-turn traffic would be expected. The proposed left-turn access would not address either of these design issues. Therefore, reducing the length of the existing median in order to provide the left-turn access at the Sandman project driveway would not be consistent with the median guidelines in the USSS.

Both the proposed project and applicant's alternative would generate approximately four AM peak hour and 20 PM peak hour inbound left turns at the proposed residential access drive. Without the left-turn access these vehicles would need to make a U-turn at the State Street/Ontare Road intersection to access the site. As discussed above, the storage capacity of the left-turn lane would be for two to three cars before vehicles would begin to stack into the adjacent through lanes. Using a Poisson distribution¹⁰ along with the cycle length of the nearby traffic signals and hourly arrival rate of vehicles to predict the likely queue length, the 95th percentile queue length would be three vehicles.¹¹ That means that only 5 percent of the time would the queue in the left lane be expected to exceed three vehicles.

The analysis shows that the proposed left-turn lane storage for two to three cars would be adequate to accommodate most queues assuming no U-turning traffic; however, there would also be some likelihood that cars could queue back out of the lane and into the eastbound through lanes. If U-turns were to occur regularly, the queues would likely extend into the through lane and impede traffic flow.

Impact on Operations From U-Turns at Hitchcock and Ontare Intersections

As previously noted, the traffic impact analyses presented in **Section 7.7.1.1** were conducted assuming no left turns would be allowed at the proposed residential driveway and that all of the eastbound vehicles entering the site would be required to make a U-turn at the State Street and Ontare Road intersection.

Currently, the Sandman Inn site experiences approximately 12 left turns into the site according to the ATE traffic study data. Under either the proposed project or applicant's alternative, the residential development would increase this number to approximately 20 vehicles in the PM peak hour—a net increase of 8 vehicles at the proposed residential driveway. However, the change in non-residential uses on the site (from the Sandman Inn and restaurant) to non-residential uses (either hotel or office) and residential uses, and the relocation of the Town & County Apartment access, will also affect the number of vehicle entering the site from the west and exiting to the east, whether or not the left turn into the site is preserved.

¹⁰ Poisson distribution is a discrete probability distribution that expresses the probability of a number of events occurring in a fixed period of time if these events occur with a known average rate and independently of the time since the last event.

¹¹ Statistics with application to Highway Traffic Analyses, ENO Foundation, 1978

**Existing Eastbound No U-Turn Sign
at State Street and Hitchcock Way Intersection**



Existing Eastbound No U-Turn Sign at Site Driveway



SOURCE: EIR Traffic Study, Iteris - March 2009

FIGURE **7.0-9**

Existing No U-Turn Signage

The proposed project, including the Town & County Apartment access relocation, will generate a net increase of about 15 U-turning vehicles at the Ontare Road intersection during the AM peak hour and a net reduction in U-Turns of about 3 vehicles in the PM peak hour. The proposed project will generate a small net reduction in U-turns at the Hitchcock intersection; however, whether or not the proposed site-access left-turn is provided will have no effect on these values.

As shown in the analysis results presented in **Section 7.7.1.1**, the additional vehicles that would be generated by not allowing the left turns at the site driveways can be accommodated at both the State Street and Ontare Road, and State Street and Hitchcock Way intersections without any significant degradation in the levels of service.

However, the number of U-turns at these two intersections would also be affected by other corridor changes and secondary impacts related to providing raised medians on State Street. If the existing raised median on State Street is extended east to block left turn access to the Sandman Inn site, it will also no longer permit left-turn access in to the Burger King restaurant on the south side of State Street. The ATE traffic study indicated that approximately 14 vehicles turned left into the Burger King site during the PM peak hour on the day surveyed. Therefore, extending the raised median and eliminating left-turn access to the Burger King site would increase the number of westbound U-turns at the State Street and Hitchcock Way intersection by approximately 14 vehicles during the PM peak hour as these vehicles could no longer turn directly into the Burger King site. The intersection analyses presented in the ATE traffic studies and the results of the analyses presented in this report indicate that the added number of turning vehicles generated by eliminating left-turn access to the Burger King site could be accommodated at the State Street intersections; impacts would be *less than significant* (Class III) to traffic operations.

A larger issue than just the Sandman Inn site and Burger King left-turn access is that by adding raised medians along State Street between Hitchcock Way and Ontare Road, as recommended in the USSS guidelines, the number of U-turns at both the State Street at Ontare Road and State Street at Hitchcock Way intersections will increase as vehicles that currently make mid-block left turns along this block will need to make U-turns at these two intersections in the future. This will increase the need for future additional left-turn lane storage at the westbound State Street/Hitchcock Way and eastbound State Street/Ontare Road intersection approaches. The amount of additional storage space is not currently known. However, developing the proposed left-turn lane at the site access driveway will preclude any future lengthening of the westbound Hitchcock left-turn lane.

As shown in **Figure 7.0-10, PM Peak Hour Stacking in Westbound Left-Turn Lane, State Street and Hitchcock Way**, the westbound left-turn lane at the State Street and Hitchcock Way intersection already occasionally fills during the peak hours. Anecdotal data and field observations indicated that the queues in this westbound left-turn lane extend briefly into the adjacent through lanes during the PM peak hour. With the potential to add more traffic to this turn lane by background traffic growth and cumulative

projects, and with any future restriction of mid-block left turns along State Street, the queues in this turn lane will very likely get longer and require additional stacking space. Providing the left-turn access for the site's proposed residential driveway would eliminate the potential to extend the westbound left-turn lane at the State Street and Hitchcock Way intersection as the lanes would be back-to-back as previously shown in **Figure 7.0-8**.

Based on the data and future planning goals for the Upper State Street corridor, the preferred option for the City would be to retain the ability to extend the length of the westbound left-turn lane at the State Street and Hitchcock Way intersection. Retaining that ability would preclude the development of an adequately sized left-turn lane for the site's residential access driveways.

Driveway Frequency and Spacing

The USSS recommends reducing the number of driveways and median access points along State Street and providing a minimum driveway spacing of 220 feet and a preferable spacing of 440 feet, if feasible, in order to reduce potential conflicts/"friction" and improve mid-block through traffic flow.

The project site currently has four access driveways with the westernmost driveway located very close to the State Street and Hitchcock Way intersection. The proposed project and applicant's alternative both propose to reduce the number of site driveways from four to two, with the westerly driveway located about 210 feet east of the Hitchcock Way crosswalk and the easterly driveway located another 130 feet to the east of the westerly driveway. The existing and proposed project access driveways were previously illustrated in **Figure 7.0-8**.

The close spacing of the two driveways increases the friction between westbound vehicles entering the hotel/office driveway (westerly driveway) and vehicles exiting to the west from the residential driveway (easterly driveway). The exiting residential traffic will need to look to the east to identify gaps in traffic when exiting the site and will also need to look to the west immediately to make sure no vehicles are slowing to turn into the hotel driveway. While this spacing is not optimal, it is an improvement from the existing conditions.

The location of the site driveways in relation to the Hitchcock Way intersection is also important. For the proposed project, the proposed hotel (westerly) driveway would be located at the eastern end of the existing westbound left-turn lane. Vehicles exiting the hotel and then making a U-turn at the Hitchcock Way intersection may find the left-turn lane filled with vehicles waiting for the left-turn arrow on State Street at Hitchcock. If vehicles attempt to exit the hotel driveway when the left-turn lane is queued past the driveway they would be stopped crossways in the westbound through lanes blocking traffic.



**PM Peak Hour Stacking in Westbound Left-Turn Lane
State Street and Hitchcock Way, January 2009**



SOURCE: EIR Traffic Study, Iteris - March 2009

FIGURE **7.0-10**



PM Peak Hour Stacking in Westbound Left-Turn Lane, State Street and Hitchcock Way

1012-001•03/09

The proposed residential driveway provides a better location to accommodate exiting westbound traffic because of the longer distance from the Hitchcock Way intersection. This will reduce the potential for westbound vehicles queued at the State Street/Hitchcock Way intersection to block the driveway. However, as noted in the ATE traffic studies, the existing westerly driveway at the project site currently is occasionally blocked by stopped traffic during the peak hours.

In addition to the distance between the proposed driveways and the Hitchcock Way intersection, it is important to consider the spacing to the east of the site. Approximately 100 feet east of the proposed residential (easterly) driveway site is the Auto Club building (3712 State Street) driveway. If a large volume of traffic is concentrated at the eastern end of the project site, the problems outlined above due to closely spaced intersections will be exacerbated at that driveway. Therefore, a balance between the number of driveways and the spacing of access along the street will need to be considered.

The allowed movement of traffic in to and out of the driveways is also important in minimizing operational conflicts. If left turns are allowed at the site driveways there will be additional potential conflict points between through and turning vehicles versus if the driveways are right-turn only (as proposed).

The close spacing and number of driveways also increases the potential conflicts between vehicles and pedestrians or bicyclists and between multiple vehicles, especially as vehicles approach the Hitchcock Way intersection where drivers will need to watch the traffic signal. Reducing the number of access driveways will reduce the potential for conflicts at the driveways. In addition, increasing the spacing between the driveways and intersections will improve traffic flow along State Street and provide a better pedestrian and bicyclist environment.

The reduction from four site driveways to two will improve operating conditions at the site driveways and along State Street. The spacing of the proposed project's hotel driveway as measured from the centerline of Hitchcock Way to the driveway edge would meet the minimum driveway spacing requirement of 220 feet identified in the USSS; however, the spacing of 130 feet between the proposed project hotel and residential driveways would be less than the minimum recommendation of 220 feet. Based on the project site frontage length, meeting the spacing for both of the above would not be feasible. Given the physical size of the site frontage, the proposed land uses, the expected volume of traffic to be generated, and the proposed net decrease in number of driveways along the properties, the proposed project and applicant's alternative driveway access configuration is potentially an acceptable design from a technical traffic and circulation perspective.

Impacts associated with reducing the number of driveways would not be significant (*no impact*). However, as the spacing of the project driveways as proposed would be less than the recommended minimums, they would be potentially inconsistent with the USSS.

Summary of On-Street Circulation

The left-turn lane proposed for eastbound State Street under either the proposed project or the applicant's alternative could be physically installed and, if implemented, could accommodate queuing for up to three vehicles. The intersection analyses indicate that the additional U-turns generated by not having a left-turn site access will have a *less than significant* (Class III) impact at the Ontare Road or Hitchcock Way intersections.

The long-range goal of providing extended landscaped medians on State Street between Hitchcock and Ontare is to reduce friction along the corridor and reduce the number of potential conflicts between through and turning vehicles. Since the number of vehicles that will need to make U-turns at the Hitchcock and Ontare intersections along State Street will increase as left-turn access to other sites is restricted, it will be important for the City to maintain the ability to provide extra left-turn lane storage at the westbound State/Hitchcock intersection approach. The proposed left-turn lane for the Sandman Inn site would preclude future expansion of the left-turn lane at the Hitchcock intersection.

In general, the proposed left-turn would not be consistent with the USSS guidelines, neither for expanding medians to control mid-block turns and reduce conflict points nor for providing landscape improvements in the area. In addition, the limited number of left turns that would be served by the proposed left-turn access and the design issues related to controlling illegal U-turns and limited left-turn storage do not make the left-turn access a necessary measure for addressing site impacts or improving corridor operations. While the environmental impact of the left-turn lane is less than significant, mitigation measures have been recommended for policy consistency.

The two project driveways, as proposed in both the proposed project and applicant's alternative, are consistent with the USSS guidelines in terms of reducing the number of access driveways the number of driveways from the current four driveways. However, even with the reduction to two driveways as proposed, the driveway spacing in relation to each other and to the State Street/Hitchcock Way intersection is less than desirable. Optimally, the spacing between a driveway and the Hitchcock Way intersection should be more than the minimal 110 feet listed in the USSS guidelines (see Table 3 of the USSS guidelines). However, that spacing would be acceptable if a longer spacing could not be provided. A more desirable location would be at least 300 feet east of Hitchcock Way. This is so that vehicles exiting the site and wanting to access the westbound left-turn lane at Hitchcock would be entering State Street

beyond the start of the turn lane. However, as noted above the proposed commercial driveway is about 210 feet from the Hitchcock Way intersection and would be acceptable. There would be *no environmental impact* associated with the proposed driveways; however, reducing the number of driveways to one would be more consistent with City policy.

Safety

Impacts to Bicycle Traffic on San Remo

The relocation of the Town & County driveway would add at most about 11 PM peak-hour vehicles (see **Figure 7.0-3**) to the sections of San Remo Drive east and west of the proposed Town & County Apartment access driveway. During that same time period, San Remo carries about 285 vehicles. The increase in vehicles represents a less than 4 percent increase in volume and a total peak-hour link volume of less than 300 vehicles. The conclusion of this analysis is that the added trips will have little impact on bicycle trips and the Foothill Bicycle Route along San Remo Drive because of the small percentage and increase in the number of cars using San Remo Drive (on average about 1 car every 5.5 minutes) With this small increase a bicyclist using San Remo Drive may not even encounter one of the additional vehicles as it would generally take less than 5.5 minutes to bicycle the length of San Remo Drive between Hope Avenue and Ontare Road. Impacts associated with bicycle safety would be *less than significant* (Class III).

Impacts of Apartment Driveway on San Remo

As described above, the proposed access and circulation change for the Town & County Apartments will have no significant capacity impacts on San Remo Drive; however, the design of the access drive must take into consideration the existing physical conditions along the street and on both sides of the proposed driveway.

San Remo Drive is about 40 feet wide with on-street parking allowed along both sides near the proposed access point. Along most of San Remo Drive there are residential access driveways to single-family homes, duplexes, and larger apartment/condominium developments.

As shown in **Figure 7.0-11, Proposed Town and Country Apartment San Remo Access Sight Lines**, there is currently substantial vegetation on both sides of the proposed driveway location and sight lines are limited when the on-street parking is being fully utilized. The new access driveway will need to be designed to provide adequate sight lines by trimming or removing vegetation both on the site and on the adjacent parcel to the east. This will include reducing the height of the existing wood fence along the east side of the driveway to provide adequate sight lines consistent with the City's Municipal Code (SBMC Section 28.90.001.K), which requires that:

Each entrance and exit to a parking lot shall be constructed and maintained so that a pedestrian within ten feet (10') of the driveway is visible to the driver when the vehicle is stopped at the property line.

In addition, the existing on-street parking space in between the remaining driveway for the 3715 San Remo Drive site (west side of the new Town & Country Apartment access) and the proposed Town & Country Apartment access would need to be eliminated. Parking on the east side of the apartment driveway would not be affected unless the eastern edge of the new driveway is farther east than the existing residential driveway. However, to provide better sight lines for vehicles exiting the apartment driveway no parking should be allowed within 5 feet of the east edge of the driveway.

Therefore, safety due to the new Town & Country Apartment access driveway is considered a *potentially significant, but mitigable* (Class II) impact. With good design and removal of vegetation and on-street parking, adequate sight lines along San Remo Drive for vehicles exiting the driveway would be provided, and the proposed access driveway would have a *less than significant* impact on San Remo Drive operations.

Parking

The following sections provide the results and recommendations of a parking analysis for the proposed project and applicant's alternative.

Proposed Project

The proposed project includes a total of 291 parking spaces (111 parking spaces, including 4 handicap-accessible spaces for the hotel component, 145 resident parking spaces plus 18 guest spaces for the residential component in the underground parking garage, and 17 common/shared spaces along the hotel entry drive). The Santa Barbara Municipal Code¹² parking requirement for the project is 259 spaces (106 for the hotel component and 153 for the residential component). A breakdown of the required and proposed parking for the proposed project is provided in **Table 7.0-10, Proposed Project Required and Proposed Parking Supply**.

¹² City of Santa Barbara, Municipal Code, Chapter 28.90, Automobile Parking Requirements.

San Remo Drive Looking West



On-street parking to be removed along 3715 San Remo frontage

No parking within 5 feet of the east side of proposed driveway

San Remo Driveway Looking East from Proposed Driveway



Fence and shrubbery will need to be removed or cutback

On-street parking and vegetation obstruct sight lines. Fence creates sight line problem to see pedestrians. Black car in photo is approaching in westbound lane. Sight line improvements will be required to provide adequate view for cars exiting T&C site.

San Remo Driveway Looking West from Proposed Driveway



On-street parking and vegetation obstruct sight lines. Bush will need to be removed to provide adequate view of oncoming pedestrians. Sight line improvements will be required to provide adequate view for cars exiting T&C site

SOURCE: EIR Traffic Study, Iteris - April 2009

FIGURE 7.0-11

Proposed Town and Country Apartment San Remo Access Sight Lines

**Table 7.0-10
Proposed Project Required and Proposed Parking Supply**

Proposed Project	Required Spaces	Proposed Spaces	Tandem Spaces	Operationally Deficient Spaces
106 hotel rooms	106	111	0	0
73 Condominium Units	153	163*	21	12
1 Bedroom (22)	33	43	20	4
2 Bedroom (14)	28	28	0	0
3 Bedroom (37)	74	74	1	8
Guests	18	18	0	1
Shared	NA	17	NA	NA
Total Spaces	259	291	21	12

Note: Number of required spaces based on City of Santa Barbara Municipal Code Section 28.90.100.

** Includes 145 spaces in private garages with 42 of the residential spaces provided in tandem configuration for 21 units (2 spaces per unit). The 18 guest spaces are provided in open spaces in the residential garage.*

Forty-two of the residential parking spaces (21 residential units) are provided in a tandem configuration in underground garages. These tandem spaces would only be counted as one space per unit unless a parking design waiver is approved by Transportation Planning Staff.¹³ While Transportation Planning Staff have indicated support for these tandem spaces, the Planning Commission will ultimately determine if they can be supported. A reasonable worst-case scenario would result in the tandem parking spaces being counted as one space, rather than two, thereby reducing the number of proposed residential

¹³ City of Santa Barbara, Municipal Code, Chapter 28.90.045.D, "Parking Design Standards – Tandem Parking," and 28.90.100.H. Parking Required – Mixed Used Developments."

28.90.045.D. TANDEM PARKING. Notwithstanding any other provision in this Title, parking for mixed use developments may be provided in a tandem configuration (one parking space behind the other) if each set of tandem parking spaces is assigned to a single residential unit, and the tandem parking spaces are provided either on the subject lot or on an immediately adjacent lot. Vehicle movements necessary to move cars parked in a tandem arrangement shall not take place on any public street or alley. Guest parking spaces shall not be provided in a tandem configuration.

28.090.100.H. MIXED USE DEVELOPMENTS.1.Residential Uses. Parking spaces shall be provided in accordance with Subsection 28.90.100.G, subject to the following exceptions: a. In any mixed use development, where residential uses occupy up to fifty percent (50%) of the development, residential parking requirements may be reduced by fifty percent (50%) and covered parking will not be required, although it will be encouraged. If the residential use is changed to a nonresidential use, the full number of parking spaces as required in this Chapter shall be added. b. In the delineated areas of the Central Business District (CBD) shown on the map (Figure A) which is part of this code, the residential parking requirement for mixed use developments is one uncovered parking space per dwelling unit, and guest parking is not required. If the residential use is changed to a nonresidential use, the full number of parking spaces as required in this Chapter shall be added.

2. Nonresidential Uses. Parking spaces shall be provided in accordance with Subsections 28.90.100.I., 28.90.100.J. and 28.90.100.K.

parking spaces by 21 to 142. Adding in the 17 shared/guest spaces proposed, the project would continue to satisfy its residential parking requirement (142 + 17 = 159 spaces where 153 are required) per the Municipal Code requirements.

Hotel Parking Operations

Comments during the public scoping process for the proposed project questioned whether adequate parking for the hotel banquet/meeting rooms was provided. The Santa Barbara Municipal Code uses a parking rate of 1.0 parking space per room, which is the same as the rate identified in the ITE's *Parking Generation*.¹⁴ The ITE *Parking Generation* rate is the average parking demand for a Hotel (Land Use 310, see definition previously provided). Based on the land use description of a Hotel, activity for the small conference area would be included in the ITE parking generation rate. As such, the 1.0 space per room rate is appropriate for the proposed project. Additionally, as previously noted, the existing hotel contains approximately 2,261 square feet of meeting room space, so the net increase in meeting room space is approximately 2,739 square feet.

In addition to the on-site parking identified, the proposed project also has access to approximately 60 parking spaces in the adjacent office parking lot (3760 State Street) to the west of the site from 5:30 PM to 2:00 AM Monday through Friday and between 6:00 AM and 2:00 AM on Saturday and Sunday. These spaces could provide additional parking, if needed, for evening events when the banquet facility is in use and additional parking is required.

Further, to accommodate additional parking in the hotel garage, the facility could be operated as a valet facility with guests picking up and dropping off their vehicles at the hotel entrance and valets would take them to and from the garage. That would allow additional areas of the garage to be utilized for parking to increase the number of available parking spaces. It should be noted that this is not a part of the project proposal, nor is it required or recommended as a mitigation measure to address daily parking needs.

Impacts associated with hotel parking would be *less than significant* (Class III).

Residential Parking Operations

Access to the residential parking area is via a ramp from the easterly driveway on State Street to the underground parking garage. The ramp has a sharp left-turn as drivers descend the ramp into the garage. In the garage, most of the residential spaces (145 out of 163 spaces) are provided in enclosed parking areas (private garages) dedicated and connected to the unit above. This parking is secured behind closed doors for security. The remaining 18 spaces are provided in open parking stalls along the west central portion of the garage, and are intended as guest spaces.

¹⁴ *Parking Generation*, 3rd Edition, Institute of Transportation Engineers, Washington, D.C., 2004

As noted in the Initial Study (see **Appendix 2.0**), City transportation staff had concerns with visibility, friction and turning movements in the garage. A review of the draft parking garage layout revealed that the access maneuvers into and out of some of these parking spaces are awkward and cannot be completed in a single maneuver as required by the City's Municipal Code.

Figure 7.0-12, Parking Access Review for Proposed Project Residential Garage, illustrates the results of a parking circulation analysis of the residential parking garage. As shown in the **Figure 7.0-12**, access to six residential garages require vehicles to either make multiple maneuvers to enter or exit the garage or would require the driver to drive into the opposing traffic lane multiple times to access the garage stall. In addition, one of the guest spaces could not be egressed in a single maneuver without contacting one of the structural columns. The following provides a brief description of the issues with each of the six units' garages¹⁵ (see **Figure 7.0.12** for locations):

- **Unit 1:** This one-bedroom unit is located in the southeast corner of the garage. Access out of this unit's garage is difficult in that when vehicles are leaving and accessing the exit ramp to State Street they cross into the path of possible oncoming traffic in the exit drive and the ramp itself. The access to this unit's garage is very poor and its parking should be relocated.
- **Unit 2:** This three-bedroom unit is located directly west of the garage ramp and is accessed from the south side and appears to share access with Unit 3. Access into this unit's garage requires drivers to make a set of reverse turns to enter and in the process cross into the path of exiting vehicles. In addition, unless the car has a very short turning radius, it cannot enter the parking space in one movement without contacting the west side of the entry door. The poor access to this unit is compounded by being located near the garage ramp. Combined, these factors would rate the access to this unit as below average and an alternative design should be considered.
- **Unit 3:** This one-bedroom unit is located directly west of the ramp and appears to share access with Unit 2. Access into this unit's garage parking space is very difficult as vehicles will cross into the path of oncoming vehicles and will be required to stop and back up in order to get into the space. This is compounded by being located adjacent to the ramp. The access to this unit is very poor and its parking should be relocated.
- **Unit 4:** This three-bedroom unit is located directly north of the garage ramp and cannot be entered without vehicles using the far left side of the ramp, crossing into opposing traffic, and then stopping and making a Y-turn to enter the unit. This is compounded by being located adjacent to the ramp. The access to this unit's parking is very poor and its parking should be relocated.
- **Unit 5:** This three-bedroom unit is located in the north central interior of the garage. Access into the north space (right space in **Figure 7.0-12**) in this unit's garage requires cars to cross into the oncoming travel lane twice. If those paths are blocked, the cars will have to make a Y-turn to enter. Access into the south (left) space cannot be made without a Y-turn maneuver. While access to this unit is not optimal, the sight lines can be improved by angling back the corner of the garage wall or converting it

¹⁵ Please note that unit references correspond to Figure 7.0-12 identifications, not actual unit references.

to open parking. Access to this unit is below average and improvements to its design should be considered.

- **Unit 6:** This three-bedroom unit is located in the west central interior of the garage. Access into the north space (right space in **Figure 7.0-12**) in this unit requires cars to cross into the oncoming travel lane twice. If those paths are blocked the cars will have to make a Y-turn to enter the garage. Access into the south (left) space cannot be made without a Y-turn maneuver. While access to this unit is not optimal, the sight lines can be improved by angling back the corner of the garage or converting it to open parking. Access to this unit is below average and improvements to its design should be considered.
- **Guest Space 7:** For guests to leave this parking space, they will have to make several maneuvers, as the space is located too close to the wall on the south side of the parking space. If the storage area door is open, the available space is even less. This parking space should be eliminated from the plan.

In addition to the number of parking spaces in the residential garage identified above as operationally deficient, the general garage layout and operation creates several conflict locations and operating problems:

- The garage has several blind corners where vehicles in the drive aisles and cars exiting garages could collide because of poor visibility (see locations marked #8 on **Figure 7.0-12**).
- The number of vehicle conflicts at the base of the access ramp creates unnecessary confusion and a high accident potential (see locations marked #9 on **Figure 7.0-12**).
- The location of guest parking near the center of the garage requires guest to travel well into the facility before even seeing the spaces. Then spaces are located in several different orientations making accessing and exiting the spaces difficult.
- The use of “dead-end” corridors is acceptable for resident parking where people using those aisles are familiar with circulation and will have a destination there when entering a dead end aisle. However, a visitor to the garage may turn down a wrong aisle when looking for the guest parking spaces or when exiting. This could result in drivers needing to back up in order to exit as there is no turnaround area provided at the ends of the aisles. If dead end aisles are used, they should be restricted to resident parking only to reduce errant driving by entering or exiting guests.
- For the tandem spaces proposed, there is no space to move the “first” vehicle in the garage while getting to the tandem-parked car. This results in blocking the drive aisles until the cars are moved.
- The design of the garage with enclosed parking spaces for each unit provides good security and options for residents to utilize the parking garages if a car is not stored there, but the design does not allow for spaces to be shifted as demand requires. This results in more parking spaces being needed since the resources cannot be shared by all users.

If all 12 spaces identified in **Figure 7.0-12** as operationally deficient were eliminated from the proposed project, it could continue to satisfy its Municipal Code parking requirement by replacing some of the shared parking spaces along the hotel access drive with residential guest parking and converting underground residential guest parking spaces to tenant parking. The 6 units with problematic spaces include 4 three-bedroom units and 2 one-bedroom units. To meet the City's parking code they must have 11 dedicated parking spaces. By replacing 11 of the 18 underground guest parking spaces with reserved resident parking and replacing 11 of the 17 spaces along the hotel access drive with residential guest parking, the project could still meet its code-required amount of parking.

If the tandem spaces do not receive decision-maker support and the 12 operationally deficient spaces are eliminated from the design, the proposed project would provide only 130 residential parking spaces (163 - 12 - 21), and the proposed project would not be able to meet the required number of parking spaces per the City's Municipal Code.

Because the ramp design and some of the operationally deficient stalls (eight parking spaces) represent a safety hazard, parking impacts associated with the residential component of the proposed project is considered *potentially significant, mitigable* (Class II). Mitigation is proposed to eliminate these eight spaces from the design and resolve the issues with the ramp, which would result in a *less than significant* parking impact. Mitigation is also recommended to improve sight lines for the remainder of the operationally deficient spaces.

Applicant's Alternative

The applicant's alternative includes a total of 239 spaces. Parking for the office space would be provided on the north side of the buildings within a surface parking lot (52 spaces), on the entry driveway (9 spaces), and within the underground parking garage (5 spaces), for a total of 66 spaces. Parking for the residential portion would be provided in a 169-space underground parking structure, with 123 spaces provided in private garages and the remaining spaces provided in surface spaces. Of the 46 surface spaces, 22 would be reserved for residents, 19 would be open for guest parking, and 5 would be allocated to the office use. Nine shared spaces would be provided on the westerly entry driveway. City code requires 155 spaces for the residential portion of the development with 137 spaces required for resident parking and 18 spaces for guest parking. A breakdown of the required and proposed parking for the applicant's alternative is provided in **Table 7.0-11, Applicant's Alternative Required and Proposed Parking Supply**.

**Table 7.0-11
Applicant's Alternative Required and Proposed Parking Supply**

Proposed Project	Required Spaces	Proposed Spaces	Tandem Spaces	Operationally Deficient Spaces
14,254 Square Foot Office	64	66	0	0
73 Condominium Units	155	164*	12	4
1 Bedroom (18)	27	27	12	0
2 Bedroom (14)	28	28	0	0
3 Bedroom (41)	82	90	0	4
Guests	18	19	0	0
Shared	-	9	NA	NA
Total Spaces	219	239	12	4

Note: Number of required spaces based on City of Santa Barbara Municipal Code.

**- Includes 123 spaces in private garages with 24 of the residential spaces provided in tandem configuration for 12 units (2 spaces per unit). The 46 open parking spaces in the residential garage are allocated for 22 resident spaces, 19 guest space, and 5 office spaces.*

As with the proposed project, many of the resident spaces are provided in secure areas within the underground structure (private garages) and therefore cannot be easily shared between units or used as shared parking for other uses on site. In addition, 24 of the resident parking spaces (12 units) are provided in a tandem configuration. All of the units with tandem parking arrangements are one-bedroom units and by code are required to provide 18 total parking spaces (1.5 spaces per unit). While City staff has indicated preliminary support for these tandem spaces, the Planning Commission will ultimately determine if they can be supported. If City decision-makers do not support a waiver for those 12 inboard spaces, the total number of parking spaces provided for the residents would be reduced to 152 spaces (164 – 12) and could continue to meet the minimum code requirement of 155 spaces by reallocating parking spaces in the residential garage and some of the shared spaces along the office access drive.

Office Parking Operations

While the 66 office parking spaces meets the City's parking code requirement, some of these spaces should be allocated to specific office users. The five spaces located in the residential garage, if remaining there, should be designated to specific office tenants, as visitors would likely not find these spaces without assistance. The spaces located along the access driveway adjacent to the "shared spaces" should be marked for general office use only during normal business hours. This will limit the amount of

convenient at-grade commercial parking that may be taken by residents and their guests. To provide a more contiguous parking field for the office space, it is recommended that the plan have 14 of the 18 at-grade spaces along the office access drive be allocated to office parking and have the 5 spaces in the residential garage be designated as “guest/shared” spaces. This would provide all of the office parking in the surface facilities. Impacts associated with the office parking are considered *less than significant* (Class III).

Residential Parking Operations

A review of the circulation patterns within the underground garage revealed that access into two of the residential garages would require the driver to travel in the opposing traffic lane around a corner. **Figure 7.0-13, Parking Access Review for Applicant’s Alternative Residential Garage**, provides a diagram of the applicant’s alternative garage plan with the problem units’ garages identified. In addition to access to the two private residential garages, the garage plan also has one internal intersection that would have limited sight lines and could be a problem accident location. A vehicle backing out of the garage at the southwest corner cannot see vehicles approaching from the intersecting aisle. The following provides a brief description of the issues with each of the two units¹⁶ (see **Figure 7.0-13** for locations):

- **Unit 1:** This three-bedroom unit is located in the north central interior of the garage. Access into the north space (right space in **Figure 7.0-13**) in this unit’s garage requires cars to cross into the oncoming travel lane twice. If those paths are blocked, the cars will have to make a Y-turn to enter. Access into the south (left) space cannot be made without a Y-turn maneuver. While access to this unit is not optimal, the sight lines can be improved by angling back the corner of the garage wall. The garage could also be converted to surface parking spaces with access from the east-west drive aisle. Access to this unit is below average and improvements to its design should be considered.
- **Unit 2:** This three-bedroom unit is located in the west central interior of the garage. Access into the north space (right space in **Figure 7.0-13**) of this unit’s garage requires cars to cross into the oncoming travel lane twice. If those paths are blocked the cars will have to make a Y-turn to enter the garage. Access into the south (left) space cannot be made without a Y-turn maneuver. While access to this unit is not optimal, the sight lines can be improved by angling back the corner of the garage. The garage could also be converted to surface parking spaces with access from the east-west drive aisle. Access to this unit is below average and improvements to its design should be considered.

If the 4 spaces identified in **Figure 7.0-13** as operationally deficient were eliminated from the applicant’s alternative, the project could still continue to satisfy its Municipal Code parking requirement if, for example, the office spaces in the garage were reserved for resident parking and the office spaces were moved to the office entrance drive in place of the shared spaces.

¹⁶ Please note that unit references correspond to Figure 7.0-13 identifications, not actual unit references.

If the tandem spaces do not receive decision-maker support and the 4 operationally deficient spaces are eliminated from the design, the applicant's alternative would provide only 148 residential parking spaces (164 – 12 – 4), where 155 are required. The seven-space shortfall could be accommodated by relocating office and/or guest parking to the office access driveway in place of seven of the nine proposed shared spaces.

Parking impacts associated with the residential component of the applicant's alternative are considered *less than significant* (Class III). Mitigation is recommended to improve sight lines for some of the spaces.

Town & Country Apartments

The existing Town & County Apartments have 40 parking spaces for tenants and guests. Because the apartments are located adjacent to the Sandman Inn and there is no physical barrier between the two parking facilities, the Initial Study concluded that some residents or guests of the apartments may park in the hotel parking spaces occasionally. An informal observation of the apartment parking was conducted during a weekday in November 2008, and no apartment tenants or guests were observed parking in the hotel spaces on that day.

The Town & Country Apartments development is legal non-conforming as to parking because it does not satisfy the City's current parking requirements. However, there appears to be no data to substantiate the claim that the apartments will create spillover parking onto San Remo Drive and into the adjacent neighborhood if the project is constructed. Therefore, there would be *no parking impact* related to the Town & Country Apartments.

Summary of Parking Impacts

Proposed Project

- While the garage design is creative in finding enough parking spaces, it creates several operational concerns and is not very friendly to visitors to the site.
- The number of conflicts at the base of the garage access ramp is not acceptable. Access to private garages and surface parking spaces should be kept back from the ramp to provide clear space for vehicles using the garage ramp. In addition, vehicles entering the garage should not be required to stop while still on the sloped portion of the ramp. If stopping is required, vehicles should be on level ground beyond the ramp. This is considered a *potentially significant, mitigable* (Class II) impact.

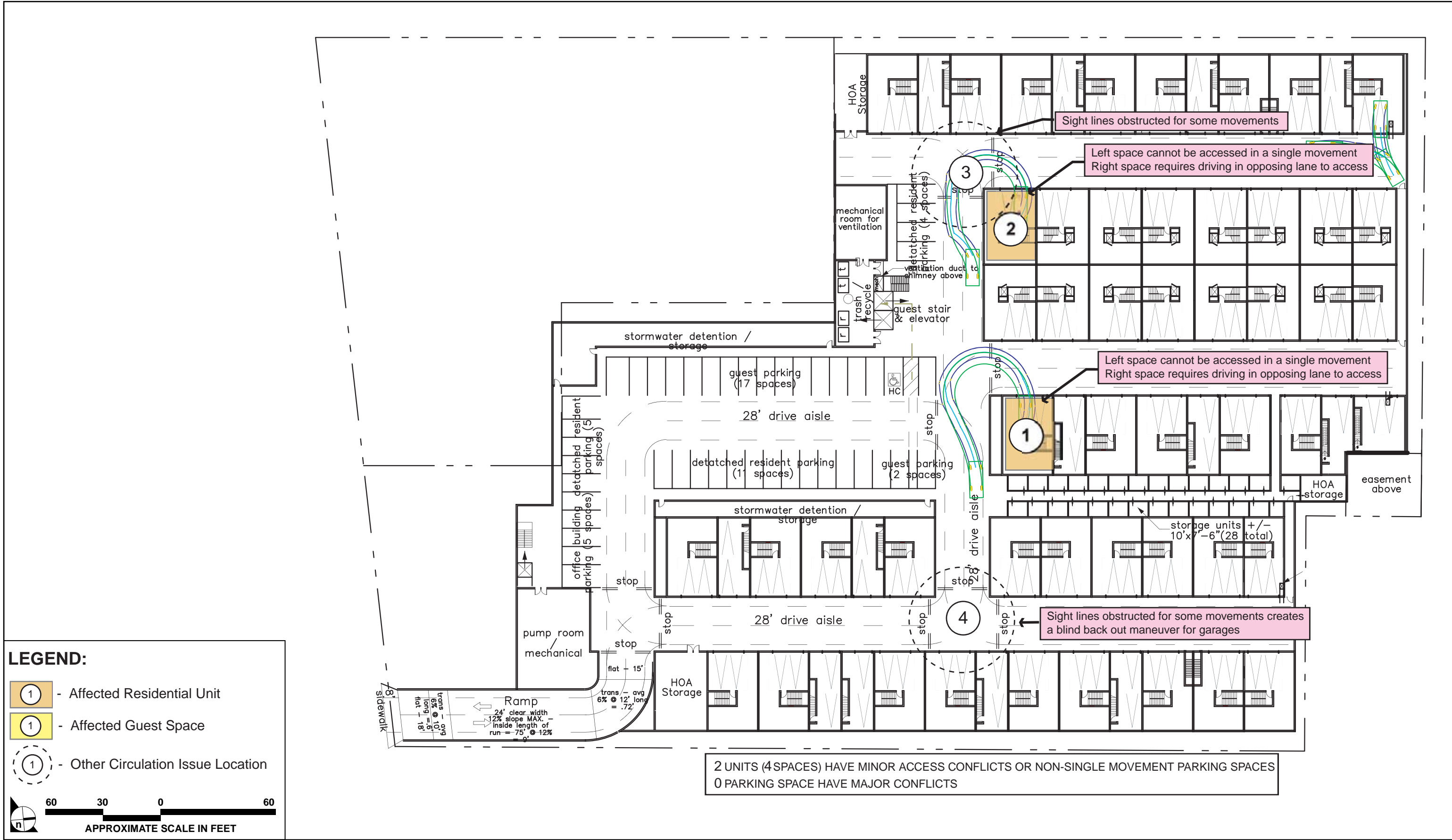


FIGURE 7.0-13

Parking Access Review for Applicant's Alternative Residential Garage

- Access to several of the private residential garages is difficult and parking for those units should be either relocated or eliminated from the plan. These include the 4 units identified in **Figure 7.0-12** that are closest to the garage ramp (units 1-4). Safety and circulation impacts associated with these spaces are considered *potentially significant, mitigable* (Class II).
- If the 12 operationally deficient spaces are eliminated from the design, the proposed project would provide only 151 residential parking spaces (163 - 12) where 153 are required. The proposed project could continue to satisfy its Municipal Code parking requirement by reallocating some underground and shared at-grade parking. (Note: only 8 of the 12 operationally deficient spaces are considered a significant safety impact from an environmental standpoint.) This is considered a *less than significant* (Class III) impact.
- Access to two of the interior residential units' parking is difficult because of the unit's location at the intersection of two access drives. Access and visibility to these units can be improved through measures such as cutting the corners of the garages back to improve site lines or converting the spaces to open parking. This is considered a *less than significant* (Class III) impact. Mitigation is recommended to further reduce any adverse affects related to visibility.
- The residential garage is not friendly to visitors looking for parking. Parking for visitors should be located near the garage entrance and have straightforward access to and from the spaces. The proposed design has visitor parking on the garage interior and in a difficult configuration for guests to find spaces. This is considered a *less than significant* (Class III) impact.

Applicant's Alternative

- Mitigation in the form of signage is recommended to ensure that the office parking is fully utilized. This is considered a *less than significant* (Class III) impact.
- The parking garage design includes 4 spaces that have been identified as operationally deficient. Access to the 4 operationally deficient parking spaces (affecting 2 residential units) could be improved by either modifying the garage designs to provide better sight lines at the aisle intersections or by converting the two private garages to open surface spaces. The design of the 2 private resident garages should be reviewed to determine if the corners of the garage adjacent to the intersecting aisles can be cut back to improve sight lines at the aisle junctions. This is considered a *less than significant* (Class III) impact.
- If the 4 operationally deficient spaces are eliminated from the design, the applicant's alternative would provide 160 residential parking spaces (164 - 4), where 155 are required. Therefore the applicant's alternative would continue to satisfy it Municipal Code parking requirement under this scenario, and there would be *no environmental impact*.

Town & Country Apartments

No Impacts.

Mitigation/Recommendations

The following measures are required and/or recommended to ensure that either the proposed project or applicant's alternative would have no significant impacts on the environment related to transportation.

Proposed Project

Required Mitigation

The following mitigation measures shall be implemented for the proposed project:

- T-1:** Final plans submitted to the Architectural Board of Review for review and approval prior to issuance of a building permit shall show the existing vegetation and fencing adjacent to the proposed new Town & County Apartment driveway being trimmed and/or removed to provide adequate sight lines along San Remo Drive in accordance with City code (SBMC Section 28.90.001.K). This shall apply to all landscaping and fencing on the 3715 San Remo Drive property. The owner of 3715 San Remo Drive shall request the neighboring property owner to the east to trim or remove vegetation and fencing on that property sufficient to provide adequate sight lines from the proposed new driveway, to be paid for by the owner of 3715 San Remo Drive.
- T-2:** Existing on-street parking adjacent to the proposed Town & County Apartment driveway will need to be removed to allow for adequate sight lines along San Remo Drive. This will result in the loss of at least one on-street parking space along the south curb. This will include the curbfront between the proposed driveway and the remaining 3715 San Remo driveway to the west. Parking should be restricted along the south curb on San Remo Drive within 5 feet of the east side of the driveway to provide adequate sight lines along the street for exiting vehicles. This information shall be shown on final plans submitted to the Architectural Board of Review for review and approval prior to issuance of a building permit.
- T-3:** The residential parking garage shall be redesigned to eliminate the movement conflicts at the base of the garage access ramp to acceptable City standards. Access to private garages and surface parking spaces should be kept back from the ramp to provide clear space for vehicles using the garage ramp. This includes addressing spaces for units 1-4 as shown in **Figure 7.0-12** of the EIR and eliminating the need for vehicles to stop on the sloped portion of the ramp. The revised parking design shall be reviewed and approved

by the City's Transportation Division, and shall be included in the plans presented to the Architectural Board of Review prior to final approval.

Recommendations

In addition to the required mitigation measures to address significant project-specific impacts, the following measures are also recommended to address operational issues, non-significant project impacts, and consistency with the *Upper State Street Guidelines*:

- T-4:** The proposed left-turn access from eastbound State Street should not be included as part of the proposed project in order to reduce the potential conflicts with opposing traffic on State Street, reduce the potential for queuing left-turn vehicles to block through traffic and reduce potential impacts on pedestrians and bicyclists.
- T-5:** The raised median in front of the site on State Street should be extended to the east, or other similar treatment, to restrict left-turns into the site. The applicant should work with City staff to determine what modifications to the existing raised median would be required to adequately accommodate the extended median. At the new eastern end of the raised median, No U-Turn signage will need to be provided. The revised median design shall be reviewed and approved by the City's Transportation Division and the City Engineer.
- T-6:** If the residential left-turn lane is allowed, the median and turn lane should be designed to accommodate No U-Turn signage, to physically restrict the ability for vehicles to turn left out of the residential driveway, and to discourage drivers from attempting U-turns at the median opening. The revised median design shall be reviewed and approved by the City's Transportation Division and the City Engineer.
- T-7:** Internal garage conflicts at the drive aisle junctions should be addressed to provide better sight lines between vehicles. Options include cutting back corners of some garages (locations 8 and 9 as identified on EIR **Figure 7.0-12** for the proposed project, or locations 3 and 4 on EIR **Figure 7.0-13** for the applicant's alternative) to improve sight lines within the garage. Circulation problems that were identified in the analysis as problematic will need to be modified or the parking spaces relocated to address congestion/conflicts in the garage.

Applicant's Alternative

Required Mitigation

The following mitigation measures shall be implemented for the applicant's alternative:

Mitigation Measures T-1 and T-2 shall be implemented.

Recommendations

In addition to the required mitigation measures to address significant project-specific impacts, the following measures are also recommended to address operational issues, non-significant project impacts, and consistency with the *Upper State Street Guidelines*:

Mitigation Measures T-4 to T-7 are recommended.

- T-8:** Commercial parking spaces located in the residential parking garage should be assigned to specific users to ensure greater use of the spaces. ~~A preferred option is to relocate these spaces to the surface spaces along the access driveway to the office buildings.~~
- T-9:** Spaces located along the office access driveway that are included in the total number of spaces required to meet the parking code requirement for the office use, should be marked as "for office use only" during business hours.

Residual Long-term Impacts

After the implementation of the required mitigation measures, the long-term impacts related to traffic, circulation, safety, and parking for either the proposed project or the applicant's alternative would be *less than significant* (Class II).

7.7.2 Temporary Construction Impacts

Subsurface parking garages are proposed for both the proposed project and applicant's alternative, resulting in excavation up to 15 feet in depth, excluding foundation excavation. It is anticipated that excavation will total approximately 80,000 cubic yards of material for the proposed project, or 60,000 cubic yards for the applicant's alternative. As with demolition waste, excavated materials will be transported from the site via the proposed haul route as shown in **Figure 3.0-6**.

The overall project construction process is estimated to last approximately 2 years and 5 months (29 months) for the proposed project. This would include demolition and site preparation lasting

approximately 14 weeks, grading and excavation for an estimated 10 weeks, and construction duration of an estimated 25 months. Working hours during the construction process are proposed to be 7:00 AM to 7:00 PM Monday through Saturday and 8:00 AM to 7:00 PM Sunday and holidays. It is anticipated that staging, equipment, materials storage, and temporary construction worker parking would occur on-site for the duration of the project.

For the applicant's alternative, the overall project construction process is estimated to last approximately two years (24 months). This would include demolition and site preparation lasting approximately 14 weeks, grading and excavation for an estimated eight weeks, and construction duration of an estimated 19 months. Working hours during the construction process are proposed to be 7:00 AM to 7:00 PM Monday through Saturday and 8:00 AM to 7:00 PM Sunday and holidays. It is anticipated that staging, equipment, materials storage, and temporary construction worker parking would occur on-site for the duration of the project.

Because the proposed project includes a longer construction period, with more excavation and export than the applicant's alternative, the proposed project will be used for this analysis. The assumption is that the applicant's alternative would result in similar or reduced impacts associated with construction than the proposed project.

The proposed project would generate construction-related traffic that would occur over the twenty-nine month construction period and would vary depending on the stage of construction. The peak traffic generated at any one time by construction is estimated to be 120 vehicles per day (during Phase III – Temporary Shoring and Mass Excavation). Temporary construction traffic is generally considered an adverse but not significant impact. However, given the relatively long duration of construction required for this project, there is the potential for construction to overlap with other large projects proposed in the area, and given existing traffic levels in the area, short-term construction-related traffic may create impacts if not effectively managed.

Construction Traffic Generation

To determine what impacts project construction might create, an estimate of trips generated by project construction was prepared. As noted above, the peak traffic generation is expected to be during the shoring and mass excavation phase of the proposed project where 120 vehicle trips per day would be generated. For the analysis we have assumed that all of these trips are materials hauling with trucks exiting the site full with debris and returning to the site empty. Additionally, to account for the extra impact that large trucks have on traffic operations, a passenger cars equivalency (PCE) factor was used.

A PCE factor of 2.0, or 1 truck is equal to 2 cars, was used. In addition, we have assumed that the trips are spread evenly over an 8-hour period.

Using these assumptions, the 120 trips per day would equate to 15 vehicle trips per hour. Multiplying by the PCE factor of 2.0, the result is that the construction traffic generated would be equivalent to approximately 30 cars per hour. As shown in **Table 7.0-12, Construction Trip Generation Comparison**, the construction traffic generation is significantly less than the traffic generated by the existing uses.

**Table 7.0-12
Construction Trip Generation Comparison**

Land Use	Size	Daily		AM Peak Hour		PM Peak Hour	
		Rate	Trips	Rate	Trips	Rate	Trips
A. Existing Site							
Motel	113 Rooms	9.11	1,029	0.64	72	0.58	66
Restaurant	196 Seats	2.86	561	0.03	6	0.26	51
T&C Apartments	24 Units	6.72	<u>161</u>	0.51	<u>12</u>	0.62	<u>15</u>
Total			1,751		90		132
B. Site Construction Traffic During Mass Excavation							
Soil Haul-Away			120		15		15
Passenger Car Equivalent Factor	2 autos per truck		<u>2</u>		<u>2</u>		<u>2</u>
Construction Total			240		30		30
Net Difference to Existing (B-A)			-1,511		-60		-102

Source: Associated Traffic Engineers, 2007.

Project-Related Construction Impacts

Since the peak construction activity period would generate fewer peak-hour and daily trips than the existing development or either the proposed project or the applicant's alternative, the conclusion is that the project would not have any short-term project-related construction impacts. However, to ensure that the project would not create any unforeseen impacts as a result of program problems, the applicant will need to prepare a construction management plan and coordinate construction activities with the City to ensure that no unscheduled overlap in major construction activities occur between this project and other

efforts in the area. As a result, increased truck traffic could create short-term delays and safety concerns with existing traffic.

Impacts related to construction traffic would be *less than significant* (Class III), and mitigation is recommended to further reduce any adverse impacts.

Construction Mitigation Measures

The following mitigation measures should be implemented to further reduce any adverse impacts associated with construction traffic:

T-10: To reduce trips associated with export of site debris, prior to issuance of grading and/or demolition permits, the applicant shall develop and implement a solid waste management plan for review and approval by the City to reduce waste generated by construction and demolition activities. In addition, the applicant shall work with other development projects in the area to minimize the distance that export material is hauled from the site and manage the hours during which that hauling occurs to minimize the effects on area traffic.

T-11: Prior to issuance of building permits, the applicant shall prepare a construction management plan for review and approval by City Public Works staff. Prior to beginning the next phase of construction, review the plan with City Public Works staff and modify as needed to ensure coordination with other area construction projects to minimize any lane closures or traffic intensive activities. The construction management plan shall provide for:

- No hauling of bulk materials and waste shall occur during peak traffic hours.
- Hauling of materials shall be limited along streets that have fronting residential land uses or near school sites.
- Flagmen shall be provided at the project's truck entrance to expedite movements into and out of the site.
- Access of all but essential construction traffic on San Remo Drive shall be limited.
- Any lane closures required along State Street for construction should be done during off-peak hours and all lanes should be open for travel during the peak commute hours and on weekends.

T-12: Prior to issuance of building permits, the applicant shall prepare a management plan for review and approval by City staff for employee parking to eliminate intrusion into area on-street parking spaces and maximize the use of available on-site parking.

Construction parking and storage shall be provided as follows:

- During construction, free parking spaces for construction workers and construction shall be provided on-site or off-site in a location subject to the approval of the Public Works Director. Construction workers are prohibited from parking within the public right-of-way, except as outlined below.
- Parking in the public right of way is permitted as posted by Municipal Code, as reasonably allowed for in the 2006 Greenbook (or latest reference), and with a Public Works permit in restricted parking zones. No more than three (3) individual parking permits without extensions may be issued for the life of the project.
- Storage or staging of construction materials and equipment within the public right-of-way shall not be permitted, unless approved by the Transportation Manager.

Cumulative Construction Impacts

As the most intense construction phase activities would generate less peak-hour traffic than the existing uses or either the proposed project or the applicant's alternative, and those projects were deemed to have no cumulative traffic impacts, the conclusion of this analysis is that the project would have no cumulative construction impacts.

As noted above, a construction management plan is recommended for the project. The applicant should work closely with other development projects in the area and the City to coordinate construction activities and minimize conflicts and/or overlap of activities that may restrict traffic capacity or create excessive construction-related traffic.

7.8 SUMMARY OF TRAFFIC, CIRCULATION AND PARKING IMPACTS

The transportation analysis for the environmental study reviewed the traffic and parking analyses previously conducted for the proposed project and applicant's alternative and conducted additional analyses for these plans. The following summarizes the findings, conclusions, and recommendations based on these analyses and reviews.

7.8.1 Project Traffic Impacts

The proposed project would generate approximately 215 fewer daily trips and 5 fewer PM peak hour trips, and 25 additional AM peak hour trips than existing conditions. The applicant's alternative would

generate approximately 852 fewer daily trips, 33 fewer PM peak hour trips, and 5 fewer AM peak hour trips than existing conditions. Traffic counts at nearby intersections show that the level of service in the AM peak hour is acceptable for existing, future, and cumulative conditions. Therefore, either the proposed project or the applicant's alternative would result in *less than significant* (Class III) project-related and cumulative traffic impacts on State Street and at area intersections and roadways.

7.8.2 State Street Residential Access

It would be physically feasible to allow left-turn access into the proposed residential access drive on State Street. Additionally, allowing left turns into the residential access drive would not result in a significant environmental impact related to traffic or circulation. Impacts are *less than significant* (Class III).

However, the modification of the existing median and provisions for eastbound left turns into the site ~~would~~ may not be compatible with the guidelines and ~~principals principles~~ of the USSS and would limit the City's ability to provide future improvements at the Hitchcock Way intersection. ~~Because~~ The recommendations of the USSS were adopted in order to improve circulation, traffic operations, and safety within the Upper State Street corridor for automobiles, pedestrians, and bicyclists, and the proposal for a left turn lane may conflicts with this direction, ~~it is recommended that the proposed residential left-turn access not be provided.~~

7.8.3 Impacts of Apartment Driveway on San Remo

The proposed access and circulation change for the Town & County Apartments will have no significant capacity impacts on San Remo Drive; however, the design of the access drive must take into consideration the existing physical conditions along the street and on both sides of the proposed driveway. The current design raises concerns relative to safety and adequate sight lines. Therefore, safety due to the new Town & County Apartment access driveway is considered a *potentially significant, but mitigable* (Class II) impact that can be resolved with design measures to ensure adequate sight lines.

7.8.4 Parking Supply, Access and Circulation

The residential garage plan for the proposed project has several operational issues and if spaces are excluded for not being compliant with City standards then the plan, as presented, would not meet code requirements for parking relative to parking stall assignment (SBMC Section 28.90.100.G.3.e), but could still meet the numerical requirement (SBMC Section 28.90.100). The ramp and some of the spaces represent a *potentially significant, but mitigable* (Class II) impact related to safety that can be resolved by eliminating or redesigning those impacted spaces as well as the driveway ramp.

The residential garage plan for the applicant's alternative has several operational issues and if spaces are excluded for not being compliant with City standards then the plan, as presented, would not meet code requirements for parking relative to parking stall assignment (SBMC Section 28.90.100.G.3.e), but could still meet the total numerical requirements (SBMC Section 28.90.100) for number of spaces. The operationally deficient spaces represent a *less than significant* (Class III) impact, which could be addressed by redesigning and/or reassigning the project's parking facilities. Generally, the applicant's alternative provides a better parking layout and circulation pattern than the proposed project. Impacts related to parking supply access and circulation would be *less than significant* (Class III) for the applicant's alternative.

7.8.5 Construction Impacts

The proposed project and the applicant's alternative would result in *less than significant* (Class III) construction impacts; however, a construction management plan should be prepared and close coordination with City staff and other area construction projects will be required to prevent impacts to nearby roadways and intersections.

8.0 VISUAL AESTHETICS

8.1 INTRODUCTION

The project has the potential to adversely alter important public scenic views and community aesthetics within the North State neighborhood and within this portion of the City. This section assesses potential visual impacts based on the development of either the proposed project or the applicant's alternative using conceptual design plans. Through use of visual simulation computer modeling at selected public vantage points, the potential long-term visual impacts of the proposed project and applicant's alternative are addressed.

8.2 REGULATORY FRAMEWORK

Numerous guidance documents regulate the architectural, landscape, and lighting design of new development. These documents include the *City of Santa Barbara General Plan, Architectural Board of Review (ABR) Guidelines*, the City's *Urban Design Guidelines, Upper State Street Area Design Guidelines*, and the Municipal Code.

8.2.1 General Plan

Scenic Highways Element

State-designated scenic highways, as well as highways eligible for such designation, are discussed in the Scenic Highways Element of the *City of Santa Barbara General Plan*.¹ The Scenic Highways Element also discusses roadways proposed for eligibility as state scenic highways and as City scenic routes. The designated and eligible highways and streets are as follows:

State Designated: State Highway 154

State Eligible: US Highway 101

Proposed State Eligible: Cabrillo Boulevard from US Highway 101 to Castillo Street, Sycamore Canyon Road from Alameda Padre Serra to Stanwood Drive, Stanwood Drive to Mission Ridge Road where it intersects with Mountain Drive, and Mountain Drive to Los Olivos Street.

Proposed City Eligible: Shoreline Drive from Castillo Street to the end of Shoreline Park.

¹ City of Santa Barbara, *General Plan*, Vol. I, 115–124.

Conservation Element

The Conservation Element notes that land areas which are high in scenic value should be conserved. It also notes that it is these scenic values which attract both tourism and residential development in areas of high visual sensitivity.² The Conservation Element also recognizes the presence of trees throughout the City as invaluable in the preservation of the rustic, visually pleasing appearance of Santa Barbara. Widely distributed along many streets, the trees provide needed greenery and shade while concealing some buildings and unsightly utility lines and poles.

The City's visual resources are discussed in the Conservation Element of the general plan. The Conservation Element lists the following goals that would be applicable to the project site:³

- Protect and enhance the scenic character of the City, and
- Maintain the scenic character of the City by preventing unnecessary removal of significant trees and encouraging cultivation of new trees.

Specific policies applicable to the proposed project and applicant's alternative include:

3.0: New development shall not obstruct scenic view corridors, including those of the ocean and lower elevations of the City viewed respectively from the shoreline and upper foothills, and of the upper foothills and mountains viewed respectively from the beach and lower elevations of the City.

4.0: Trees enhance the general appearance of the City's landscape and should be preserved and protected.

Applicable implementation strategies include:

4.1 Mature trees should be integrated into project design rather than removed. The Tree Ordinance should be reviewed to ensure adequate provision for review of protection measures proposed for the preservation of trees in the project design.

4.2 All feasible options should be exhausted prior to the removal of trees.

4.3 Major trees removed as a result of development or other property improvement shall be replaced by specimen trees on a minimum one-for-one basis.

In response to the need for the protection of trees from removal during construction, the Municipal Code includes a tree ordinance.⁴ Under this ordinance, it is "unlawful to cut down or otherwise destroy or authorize the destruction or cutting down of any tree that has been designated as an historic or specimen

² City of Santa Barbara, *General Plan*, "Conservation Element," adopted August 1979 and last amended July 1994.

³ Ibid.

⁴ Ibid., Municipal Code, Chapter 15.24, "Preservation of Trees."

tree by the City Council ...” Continued protection and enhancement of trees is an important consideration in maintaining the visual resources of the City.

8.2.2 Architecture Board of Review Guidelines

The *Architectural Board of Review (ABR) Guidelines* have been developed to guide development proposals to ensure high standards of design are maintained in development and construction in the City of Santa Barbara.⁵ The guidelines are also intended to assist public understanding of the stated goals and adopted policies of the ABR. In addition to ABR-specific guidelines, there are supplemental design guidelines found in a series of separate documents. If applicable, these supplemental design guidelines provide more detailed direction for some projects in certain areas of the City.

Architectural Design Guidelines

The Architectural Design Guidelines are intended to provide a clear statement of preferred design solutions and building materials considered acceptable by the ABR. Generally, these guidelines apply to both commercial and multi-family residential projects, unless the more-specific guideline specifies a more narrow scope of application.

Landscape Guidelines

The Landscape Guidelines provide general and specific guidelines for landscape plan design and installation throughout the City. Landscaping should be used as a unifying element within a project to enhance a building site and help achieve project compatibility with existing surroundings while complying with applicable policies and regulations.

8.2.3 Urban Design Guidelines

City Grid

The City of Santa Barbara adopted *Urban Design Guidelines* for projects in the City grid in 1999.⁶ These guidelines apply to projects located within the traditional center of Santa Barbara and the City’s south coast. The proposed project is west of the center of the City and is not located within the City grid. Therefore, these design guidelines do not pertain to the proposed project or applicant’s alternative.

⁵ City of Santa Barbara., *Architectural Board of Review Guidelines*, revised July 3, 2007.

⁶ *Ibid.*, *Urban Design Guidelines: City Grid*, prepared by the City of Santa Barbara Planning Division, adopted by the City Council Resolution 99-138, December 1999.

Upper State Street Area

The City adopted special design guidelines for the Upper State Street area (see **Figure 3.0-4, Neighborhood Map**) to encourage designs which will be compatible with the existing neighborhoods and enhance the City's distinct built environment.⁷ It is recognized that the Upper State Street area contains several unique neighborhoods, a variety of old and new architecture, and a desire to possess its own identity within the context of Santa Barbara.

8.2.4 Upper State Street Study

In 2006, in recognition of community concerns about development proposals in the Upper State Street area, the Santa Barbara City Council directed staff of the Planning and Transportation Divisions to undertake a study of the Upper State Street commercial corridor between Highway 101 and Calle Laureles, working with the public, City commissions, and consultant teams.

The purpose of the *Upper State Street Study*⁸ (USSS) report is to identify changes that could improve traffic circulation and urban design in the study area. Issues addressed in this study include area character and openness, landscaping and streetscape design, scenic views, open space and creeks, building heights and setback distances from the street, vehicle traffic, circulation and parking, and pedestrian and bicycle safety and connectivity in the area. The USSS includes Summary Direction and Improvement Measures that relate directly to aesthetics, compatibility, and protection of mountain views.

Summary Direction: Maintain the backdrop of panoramic mountain views that contributes to the area's sense of place by protecting or establishing intermittent and recurring mountain view corridors and viewing locations on a block-by-block basis.

- **Step Buildings.** Consider stepping upper stories back as one design solution to create view corridors.
- **Intersection Views.** Protect views at corners that intersect with State Street.
- **Parking Placement.** Parking may be placed in the front of buildings if necessary to provide scenic view corridors or public viewing locations, with landscaping or other visual screening of the parking provided.

⁷ City of Santa Barbara, *Upper State Street Area Design Guidelines*, adopted by the City Council on July 7, 1992.

⁸ *Ibid.*, *Upper State Street Study Report*, prepared by the Planning Division, March 2007.

Summary Direction: Maintain, enhance, and create open space where feasible.

- **Open Spaces and Parks.** Create opportunities for private and public open spaces when siting development, including pocket parks, passive open spaces, and landscaping. Recognize various populations that have park needs, including all ages, and both residents and persons that come to shop or recreate (examples include passive open space, tot lots, skate parks, dog walking areas, and outdoor amphitheaters).
- **Plaza Elements.** Incorporate plaza elements as a part of development to establish street presence and a sense of open space, such as plazas, paseos, pedestrian resting areas, and bulb-outs for bus waiting areas.

Summary Direction: Encourage variation of building sizes, and require the height, bulk, mass and scale of buildings to be compatible within the context of respective blocks and subareas, proportional to parcel size, and consistent with the *Upper State Street Area Design Guidelines*, as amended.

8.3 EXISTING SETTING

The aesthetic qualities of the City of Santa Barbara vary as widely as the nature of the topography and the land uses. The manner in which the City's visual resources are perceived is twofold: first, those areas possessing aesthetic qualities attributable to natural or structural amenities; and second, those places from which scenic areas can be viewed.⁹ The close proximity of beach and mountain landforms offers a unique visual setting for Santa Barbara.

Major hillside topography does much to accentuate the visual contrast of Santa Barbara. Foothill open space provides a transition zone between residential development and the natural mountain areas. The natural character of the hillsides is aesthetically attractive in and of itself, with the real beauty of these hillsides lying in the scenic vistas they provide for residents and tourists alike.

The main project site is located in an urban environment in the western portion of the City of Santa Barbara in the North State neighborhood, which is an intensely developed commercial area with a scattering of multiple-family residential development.¹⁰ The San Roque and Hope neighborhoods, located north of the main project site, are virtually fully developed with single-family homes. The other involved parcels (to provide access to the Town & Country Apartments) are in the San Roque neighborhood.

As previously mentioned, the project site is located on the north side of State Street, in an area identified as the Upper State Street corridor. The City recently undertook a comprehensive review of this corridor,

⁹ City of Santa Barbara, *General Plan*, "Conservation Element," amended July 1994, 10.

¹⁰ *Ibid*, "Land Use Element," Amended 1995, 58 and 65.

focusing specifically on development standards, urban design, traffic, and circulation.¹¹ The USSS addresses immediate needs for physical improvements and development design standards for the area that are consistent with existing policy.

8.3.1 Upper State Street Visual Characteristics

Upper State Street is a four-lane commercial thoroughfare, well served by transit, with banks, offices, stores, a regional shopping center to the west, smaller shops to the east, and residential neighborhoods to the north and south.¹² The corridor also has magnificent views of the Santa Ynez Mountains to the north, a City park, and is a convenient destination within the South Coast region. The auto-oriented convenience affects the pedestrian character, and tends to create a disincentive to walk, stroll, or participate in other outdoor sidewalk activities.

The project site is located in the west subarea of Upper State Street as defined in the USSS.¹³ The west subarea (Highway 101 to San Roque Creek just east of Hitchcock Way) is developed with larger two- and three-story buildings, many of which meet the S-D-2 setback requirement of 10 to 20 feet.

There is tremendous variation in the public streetscape along Upper State Street, ranging from areas with lush landscaping, well-maintained sidewalk, and medians with large shade trees, to areas with little landscaping, narrow and obstructed sidewalks, many driveways, and no shade trees.¹⁴

The Upper State Street area is distinguished by scenic views of the Santa Ynez Mountains to the north, an important community asset.¹⁵ Generally, the views of the mountains are seen while traveling eastbound on State Street, with the most expansive views occurring at street intersections. Building setbacks, parking lots, and creeks also provide opportunities for views. On the north side of the street, parking lots and driveways located in the front and along the sides of buildings provide mountain view corridors. On the south side of the street, surface parking lots at the major shopping centers offer unobstructed mountain views when entering and exiting buildings or parked cars.

The amount of open space varies along the corridor.¹⁶ Large intersections with expansive views of the mountains give an overall sense of openness. Some of the larger buildings along the west subarea limit this feeling of openness. Landscaping and green spaces vary within the built environment. Some sites

¹¹ City of Santa Barbara, *Upper State Street Study Report*, prepared by the Planning Division, March 2007.

¹² *Ibid*, *Upper State Street Study Report*, prepared by the Planning Division, March 2007. 3-1.

¹³ *Ibid*.

¹⁴ *Ibid*, 3-6.

¹⁵ *Ibid*, 3-9.

¹⁶ *Ibid*, 3-12.

have landscaping between the sidewalk and the structure, and others do not. Generally, as one travels the western end of the Upper State Street corridor, the large amount of street paving, expansive front parking and landscaped areas, and deep building setbacks, give the area a “campus” office park feel.

Upper State Street has a mix of one- to three-story buildings with a wide variation in size, mass, bulk, and scale.¹⁷ This variation affects how each building appears from passing cars as well as by pedestrians, and can affect views of the mountains, depending on where a structure is located or how much of the site is built out or up. The size and massing of buildings generally relate to the size of their respective parcels. The west subarea has some of the larger buildings.

8.3.2 Surrounding Development

The project site is located in the North State neighborhood on upper State Street, which is a four-lane commercial thoroughfare, generally characterized as having commercial uses including hotels, commercial retail, office, restaurants, and banks. A variety of architectural styles and periods of construction can be found within the corridor. As noted previously, the main project site is located in the North State neighborhood and south of the San Roque neighborhoods. The neighborhoods are urban in nature and built out.

A series of photographs has been provided to show nearby development along State Street between Hope Avenue and Ontare Road. **Figure 8.0-1, Surrounding Development Photograph Locations**, shows the locations from which these photographs were taken. The photographs show surrounding development from west to east, beginning with the south side of State Street in **Figures 8.0-2 and 8.0-3, Surrounding Development – North of State Street**. **Figures 8.0-4 and 8.0-5, Surrounding Development – South of State Street**, show development from west to east on the north side of State Street.

As shown in **Figures 8.0-2 through 8.0-5**, structures in the area are generally one and two stories in height, and, along with existing landscaping, afford partial mountain views to the north. Setbacks along this stretch of State Street vary from minimal (10 feet) to substantial (up to 100 feet) separation from the sidewalk right-of-way.

Streetscape along this section of State Street includes a variety of landscaping including a mixture of street trees. Landscaping of individual parcels vary from the use of uniform street trees to a variety of small and mature trees including palms and deciduous species. Several of the parcels include small turf areas and planters. State Street is lined on both sides by 6- to 8-foot-wide sidewalks that are adjacent to the curb. Portions of the street are separated by landscaped medians that also include street trees. In

¹⁷ City of Santa Barbara, *Upper State Street Study Report*, prepared by the Planning Division, March 2007, 3-19.

addition to landscaping, streetscape includes bus stops and benches, monument signs, streetlights, and light poles.

Residential uses are located to the north of the main project site in the San Roque neighborhood. These include both single-family, duplexes, and multi-family units.

8.3.3 Existing Project Site Conditions

Structures

Existing structures on the main project site consist of the 113-room Sandman Inn, which also houses other commercial uses (nail salon) and a restaurant. The structures are relatively low-profile, one- and two-story 1960s-style buildings interspersed with parking and open areas, including swimming pools. Hotel structures are one and two stories tall, and the restaurant, which is independent of the hotel, is a single-story structure. Photographs of the existing development on the main project site as seen from State Street are provided from the locations shown in **Figure 8.0-6, Existing Project Site Photograph Locations**. The photographs of existing conditions are provided in **Figure 8.0-7, Existing Site Photographs**.

The restaurant is located on the western portion of the site as seen along State Street (see **Figure 8.0-7** [Location 1]) with two-story portions of the hotel structures partially visible behind it. The existing restaurant building (currently occupied by the Downtown Brewing Company) was originally part of the hotel complex; and, as shown in **Figures 8.0-8a, and 8.0-8b, Existing On-site Photographs**, includes a single structure with an articulated roof design that varies in height up to approximately 25 feet. The building is set back from the street approximately 20 feet and has landscaping consisting of mature trees, shrubbery, and planters.

The hotel complex consists of several buildings that are connected by surface parking accessed by four driveways from State Street (see **Figure 8.0-7** [Locations 2 and 3]). The buildings that front State Street include the hotel, office, and other commercial uses in separate buildings, along with a partially enclosed (glass windows) pool area. The front of the hotel complex includes landscaping of manicured turf, shrubs and mature trees (jacarandas and palms). The buildings fronting State Street are set back from the curb from 20 to 30 feet.

In addition to the main project site, the other involved parcels include the Town & Country Apartments (3730 State Street) and a residential duplex (3715 San Remo Drive). As shown in **Figure, 8.0-9, Town and Country Apartment Photographs**, the apartments consist of a single two-story building with an internal open common area and surface parking; in some cases, parking areas are tucked under apartments. The apartments gain access from State Street through the existing hotel parking lot. The apartments include limited vegetation and some mature trees that reach the roofline of the buildings. As shown in **Figure 8.0-**

10, 3715 San Remo Drive Duplex Photographs, the existing duplex consists of a single-story building with two driveways, each accessing a two-car garage. The eastern unit of the duplex would be demolished to create the vehicular access from the Town & Country Apartments to San Remo Drive. Each of the two duplex units takes direct access from San Remo Drive via a driveway.

Vegetation

The main project site contains approximately 205 mature trees and ornamental plants.¹⁸ Vegetation on the project site is characterized primarily by specimen non-native plants, mainly subtropical plants such as palm trees, birds of paradise, yucca, and tupidanthus, as well as jacaranda, coral, and one cedar tree. Views of the existing vegetation consist mainly of palm trees, which would be considered skyline trees under the *ABR Guidelines*.¹⁹

Mature trees on the project site along State Street include king palm, queen palm, Mexican fan palm, umbrella tree, golden bamboo, jacaranda, and cedar. A cluster of king palm, queen palm, and Mexican fan palm trees in the southwestern corner of the project site adjacent to Hitchcock Way ranges from 20 to 45 feet in height. Jacaranda trees along the site's State Street frontage range from 30 to 35 feet in height. A blue atlas cedar tree in the southeastern corner of the site reaches a height of approximately 30 feet. These plantings, along with various other ornamental landscaping, screen existing structures on the proposed project site from State Street.

In addition to trees at the perimeter of the project site, a number of trees located within the site reach heights that frame public views of the site, and would be considered skyline trees under the *ABR Guidelines*.²⁰ The majority of these trees are Mexican fan palms ranging from 45 to 65 feet in height.

As seen in the photographs of the site from State Street (see **Figure 8.0-7**), the larger trees are prominent in the views and skyline along the project site. As a result of the size of several of the non-palm trees, the views of the Santa Ynez Mountains are partially obstructed.

Views

As previously noted, the project site is located in the west subarea of the Upper State Street corridor. This stretch of State Street is distinguished by scenic views of the Santa Ynez mountain range to the north. Views of mountains are available across the project site (see **Figure 8.0-7**). These range from fully available with interruptions from skyline trees to partially and fully obscured by on-site trees. As the site

¹⁸ Charlie Eckberg, *Tree Study/Inventory, Sandman Inn 3714 State Street, Santa Barbara*, prepared for Investec, December 1, 2006.

¹⁹ City of Santa Barbara, *Architectural Board of Review Guidelines*, revised July 3, 2007.

²⁰ *Ibid.*

is viewed from State Street from the west (at approximately Hitchcock Way) to the east (to the easternmost driveway), the views of the Santa Ynez Mountains are clear with only interruptions from the taller palms that extend into the skyline. Views across the project site from the east are almost completely obscured by cedar and jacaranda trees and existing structures.

8.4 PROJECT FEATURES

The project will include the construction of either

- **Proposed Project:** construction of a three-story 106-room hotel (maximum height of 45 feet) and 73 residential condominium units (maximum height of 31 feet). This will include a total of 291 parking spaces (110 underground parking spaces for the hotel component, one at-grade hotel parking space, 163 underground parking spaces for the residential component, and 17 at-grade common/shared spaces); or
- **Applicant's Alternative:** construction of two two-story office buildings (maximum height if 31 feet) totaling approximately 14,254 square feet and 73 residential condominium units (maximum height of 31 feet). This will include a total of 239 parking spaces (66 spaces for the office development and 164 underground parking spaces for the residential component and 9 at-grade common/shared spaces).

Under either scenario, the construction of a new driveway access from San Remo Drive is proposed for the Town & Country Apartments, necessitating demolition of an existing residential unit that fronts San Remo Drive.

8.4.1 Proposed Building and Landscaping Features

Proposed Project (Hotel and Residential Condominiums)

Under the proposed project, the applicant would construct a 106-room hotel and 73 residential condominium units. The project includes a total of 291 parking spaces (111 parking spaces for the hotel component, 163 parking spaces for the residential component, and 17 common/shared spaces). **Figure 3.0-7, Proposed Project Site Plan**, shows the hotel and condominium building footprints and site details. **Figures 3.0-8 and 3.0-9, Proposed Project Elevation Diagrams**, provide architectural renderings of the proposed hotel and residential condominiums.

Hotel

The proposed hotel would measure 44 feet 6 inches in height above existing grade and would contain three stories above a one-level underground parking garage. The first floor of the hotel would be set back 20 feet from the edge of the State Street right-of-way (back of sidewalk). The second floor would be set back 30 feet from the State Street right-of-way and the third floor would be set back 50 feet from the State

Street right-of-way. The hotel has been designed in a “U” configuration around a porte cochere/loading area and includes a pool and lounging areas within the interior courtyard. The buildings would have a Mediterranean architectural theme, and would include articulated massing to break up the appearance.

Residential Condominiums

The proposed residential condominiums would be two to three stories tall and constructed above a one-level underground parking garage. The residential development would have a maximum height of 31 feet above finished grade. The units closest to State Street would have a first-floor setback of 20 feet from the edge of the State Street right-of-way (back of sidewalk); the second floor would be set back 25 feet from the edge of the right-of-way. The closest three-story residential building element is located a minimum of 85 feet from the edge of the right-of-way. The style of the residential condominiums would be Mediterranean in theme and would be generally consistent with both the proposed hotel and surrounding development.

Open Space/Plaza

A plaza and open space area (located on the residential condominium parcel) would separate the hotel from the condominiums along the hotel’s north side. This area would include a circular 76-foot-diameter turn circle with a 21-foot drive aisle located at the northern end of the access driveway. An open space area would be provided to the west of the turn circle and elevator/stairs. This area would provide a landscaped turf area suitable for active recreation for the residents of the condominiums. Spaces for bicycle parking would also be provided.

Landscaping

The proposed project would provide for landscaping throughout the main project site as illustrated in **Figure 3.0-11, Proposed Project Landscape Plan**. Landscaping along State Street would follow the City of Santa Barbara’s Master Street Tree Plan.²¹ The project would result in the removal of all existing trees from the main project site. If feasible, some trees (mature palms) may be retained and relocated on site as part of the landscaping plan. The applicant has stated the intention of incorporating the majority of on-site mature trees within the landscape plan, but no specific information on their locations is available at this time.

The landscaping plan provides for a 4-foot-wide landscape strip planted with low shrubs between State Street and the sidewalk along the frontage of the main project site. Box trees would be planted as

²¹ City of Santa Barbara, Municipal Code, Section 15.20.030, Master Street Tree Plan.

required by the City arborist. Canopy trees and/or groupings of palm trees with an underplanting of shrubs would be featured in entry areas. Landscaping along the driveway would be designed to create a linear park-like space. Medium-size canopy trees would line the driveway. Medium-size trees (15 to 22 feet in height) would also be planted in raised planters set close to buildings. Large canopy trees would be planted on the periphery of the open space/plaza area to create spatial definition between the private driveway and play/open areas.

Applicant's Alternative (Office Buildings and Residential Condominiums)

Under the applicant's alternative, the applicant would construct approximately 14,254 square feet of office space and 73 residential condominium units. The applicant's alternative includes a total of 239 parking spaces (66 parking spaces for the office component, 164 parking spaces for the residential component and 9 at-grade shared/common spaces). **Figure 3.0-12, Applicant's Alternative Site Plan**, shows the office and condominium building footprints and site details. **Figure 3.0-13, Applicant's Alternative Elevation Diagrams**, provides architectural renderings of the ~~proposed~~ office and residential condominium buildings.

Office Buildings

The ~~proposed~~ office use would be split between two buildings. The building in the southwest corner of the property would contain two offices totaling 5,688 net square feet. The second building, to the east, would include three offices totaling 8,566 net square feet. Total floor area for the office uses would be 14,594 gross and 14,254 net square feet. Each building would be two stories in height and would be set back from the sidewalk on State Street a minimum of 20 feet.

The buildings would have a Mediterranean architectural theme with covered entries to each office fronting State Street, along with second-story balcony features to break up the appearance of the south-facing elevation. A pedestrian-oriented plaza with a fountain feature would be installed within the street frontage of the offices.

Residential Condominiums

The ~~proposed~~ residential condominiums would be similar to those described under the proposed project. The applicant's alternative differs slightly from the proposed project in that the units in the proposed project that front State Street are, under the applicant's alternative, incorporated within the residential portion of the project (within an area that included portions of the hotel proposal under the proposed project), thereby providing additional open area and building setbacks (at least 95 feet) along State Street. The condominiums would be two to three stories tall and constructed above an underground parking

garage containing 169 parking spaces (164 of which are designated as residential parking spaces). The style of the residential condominiums would be Mediterranean in theme and would be generally consistent with both the proposed hotel and surrounding development.

Landscaping

The applicant's alternative would provide for landscaping throughout the main project site. The alternative landscape plan is similar to that of the proposed project, and is illustrated in **Figure 3.0-15, Applicant's Alternative Landscape Plan**. Landscaping along State Street would follow the City of Santa Barbara's Master Street Tree Plan.²² As with the proposed project, the applicant's alternative would result in the removal of all existing trees from the main project site. ~~If possible, some~~ Some trees (mature palms) may be retained and relocated on site as part of the landscaping plan. The applicant has stated the intention of incorporating the majority of on-site mature trees within the landscape plan, but no specific information on their locations is available at this time. The Conceptual Landscape Plan Plant Palette is provided on **Figure 3.0-15**.

New Town & Country Apartment Access

Access to the Town & Country Apartments, which are located immediately behind the main project site parcels, is currently provided through the hotel property. This access would be permanently closed as part of either the proposed project or the applicant's alternative. A new access to the Town & Country Apartments would be provided via a driveway connection off of San Remo Drive, requiring demolition of one residential unit (located at 3715 San Remo Drive).

8.5 IMPACT SIGNIFICANCE GUIDELINES

In accordance with the City of Santa Barbara environmental review guidelines, significant visual aesthetic impacts may potentially result if a project would:

- affect a public scenic vista or designated scenic highway or highway/roadway eligible for designation as a scenic highway;
- have a demonstrable negative aesthetic effect in that it is inconsistent with Architectural Board of Review or Historic Landmarks Guidelines or guidelines/criteria adopted as part of the Local Coastal Program; or
- create light or glare.

²² City of Santa Barbara, Municipal Code, Section 15.20.030, Master Street Tree Plan.

8.6 METHODOLOGY

The significance of visual change is assessed qualitatively based on consideration of the proposed physical change and project design within the context of the surrounding visual setting. Additionally, a project's aesthetic effects may be perceived and valued differently from one person to the next. Under CEQA, the evaluation of a project's potential impacts to scenic views is focused primarily on views from public viewpoints, but may also consider private views experienced by a community in the project's immediate vicinity. The importance of existing views is assessed qualitatively based on whether important visual resources such as mountains, skyline trees, or the coastline, can be seen, the extent and scenic quality of the views, and whether the views are experienced from public viewpoints. The visual changes associated with the project are then assessed qualitatively to determine whether the project would result in substantial effects associated with important scenic views, on-site visual aesthetics, and lighting.

Significant visual aesthetics impacts may potentially result from:

- Substantial obstruction or degradation of important scenic views, including views from scenic highways; extensive grading and/or removal of substantial amounts of vegetation and trees visible from public areas without adequate landscaping; or substantial loss of important public open space.
- Substantial negative aesthetic effect or incompatibility with surrounding land uses or structures due to project size, massing, scale, density, architecture, signage, or other design features.
- Substantial light and/or glare that poses a hazard or substantial annoyance to adjacent land uses and sensitive receptors.

The visual impact analysis uses massing studies and view simulations to assess the potential effect of the proposed project or the applicant's alternative on the quality of the existing viewshed within the project vicinity, as well as from off-site locations.

8.6.1 Massing Study

Articulated massing simulations were prepared for both the proposed project and applicant's alternative. Articulated massing represents a middle ground between photorealism and plain massing. Massing diagrams were prepared depicting the major sculptural elements of the buildings, and included the location of such elements as windows and doors, balconies, roof overhangs, and chimneys. The shade cast, corresponding with the photograph, for each view location was prepared to assist reviewers in assessing bulk and scale. Articulated massing diagrams do not include vegetation or streetscape.

Photographs of each view location were taken using a high-resolution “full frame” digital camera, taking into consideration the amount of area that can be seen by the human eye at any given point. Photographs were taken at an eye-level height of 5 feet 8 inches to represent a pedestrian’s view frame.

The photograph locations were selected in consultation with City staff and were taken on November 10, 2008.

The process for developing the simulations included the following:

1. Photographs were taken at five locations and GPS coordinates for each location were recorded. The locations of photographs correspond to the view corridor and line-of-sight profiles.
2. Three photographs were selected for the final simulations.
3. Proposed topography was inserted and the results were matched to the selected photographs.
4. Using the selected views, 3-D coordinates for each of the cameras were established by matching the existing conditions found in the photography to the digital topography.
5. Visual models were prepared for the proposed project and applicant’s alternative as viewed in the selected photographs.

8.6.2 Visual Simulations

Using the topographic model from the massing study in conjunction with the site plans, three photorealistic simulations were developed for both the proposed project and the applicant’s alternative and included versions with and without landscape vegetation (for a total of 12 simulations). Simulations used site plans and three-dimensional computer models provided by the applicant of both the proposed project and the applicant’s alternative.

Limited landscape and streetscape were included in the visual simulations; this included major trees and shrubs, light poles, and substantial streetscape components. The simulations were based on pedestrian-level views from viewpoint locations selected in consultation with City staff.

Photorealistic simulations depict all elements of a building and include windows and doors, balconies, roof overhangs, chimneys, walkways, stairs, and hardscape. Realistic texturing was applied to all surfaces for evaluating whether the proposed project or applicant’s alternative blended into the surrounding environment.

Based on the technical drawings provided, subtle details were added to make the photo simulations as realistic as possible. Realistic effects such as lighting, shadows, contours, and landscape were included as they would appear following construction. The landscape concepts are approximate and demonstrate the

look and feel of vegetation growth after five years, based on landscape plans provided by the applicant for both the proposed project (see **Figure 3.0-11**) and the applicant's alternative (see **Figure 3.0-15**)

8.7 IMPACTS

The environmental impact analysis presented below is based on determinations made in the Notice of Preparation (NOP) for issues that were determined to be potentially significant, or for issues identified by reviewing agencies, organizations, or individuals commenting on the NOP that made a reasonable argument that the issue was potentially significant (see **Responses to NOP, Appendix 2.0**).

The Initial Study determined that the proposed project would not result in significant impacts for the following threshold:

- Create light or glare.

A discussion of the potential impacts for those effects determined not to be significant is provided in **Section 11.0** of this EIR.

The Initial Study determined that the proposed project may result in significant impacts for the following thresholds:

- affect a public scenic vista or designated scenic highway or highway/roadway eligible for designation as a scenic highway; and
- have a demonstrable negative aesthetic effect in that it is inconsistent with Architectural Board of Review or Historic Landmarks Guidelines or guidelines/criteria adopted as part of the Local Coastal Program.

8.7.1 Affect a public scenic vista or designated scenic highway or highway/roadway eligible for designation as a scenic highway?

The City's general plan requires that new development not obstruct scenic view corridors, including views of the upper foothills and mountains.²³ The USSS provides further guidance on the implementation of this policy as it relates to the context of the Upper State Street area. In particular, public views of the Santa Ynez Mountains are protected by the implementation of building height restrictions within the S-D-2 zone, by required setbacks for two- and three-story structures, and by the preparation of landscaping plans that frame mountain views without blocking them. View corridors, particularly those at street intersections, are considered important resources and should be preserved or created by development with the study area.

²³ City of Santa Barbara, *General Plan*, "Conservation Element," 47.

Scenic Vistas

As previously noted, the project site is located on Upper State Street in an area noted in the USSS as the western subarea. This area is noted for views of the Santa Ynez Mountains to the north.

Massing and Visual Simulations

To evaluate the potential impacts to scenic vistas, a massing study and visual simulations were completed.

Project Massing

The key elements of urban design are street hierarchy and block form; building bulk, use, type, and arrangement; view corridors; natural areas and open space; and streetscape elements.

Massing diagrams were prepared for both the proposed project and the applicant's alternative that illustrate the mass (size and bulk) of the proposed structures against the existing topography without any landscaping. **Figure 8.0-11, Massing Diagram Photograph Locations**, shows the viewpoints that are represented in the massing diagrams, which are provided in **Figures 8.0-12 through 8.0-15**. The proposed buildings for both the proposed project and applicant's alternative were superimposed onto the existing topography from a number of viewpoints around the project site. The massing diagrams for viewpoints 1 through 4 provide for a simulation of the potential massing of the proposed project and applicant's alternative as viewed from vantage points along State Street with the Santa Ynez Mountains in the background. Viewpoints 5 and 6 show both the proposed project and applicant's alternative from vantage points looking south across the project site towards State Street.

As illustrated, the structures of either the proposed project (hotel and condominiums) or the applicant's alternative (offices and condominiums) would fully or partially obstruct the views of the Santa Ynez Mountains (see **Figures 8.0-12 through 8.0-15** [Locations 1 through 4]). Looking toward the south [Locations 5 and 6], the structures of either the proposed project or the applicant's alternative tend to mirror the elevation of the hills south of the project site. However, as noted in the photographs for all the vantage points, existing development/landscaping tend to fully or partially obstruct the ridgelines and mountain views as seen in all the photographs.

As shown in the massing diagrams (see **Figure 8.0-12** [Locations 2 and 3] and **Figure 8.0-14** [Locations 2 and 3]), the proposed hotel and office buildings both obstruct views of the mountains. For the most part, the residential condominium portion of either project would preserve existing views of the mountains to the north.

Visual Simulations

Visual simulations were prepared of both the proposed project and the applicant's alternative. Visual simulations were prepared using photographs taken from the locations indicated in **Figure 8.0-16, Visual Simulation Photograph Locations**.

As shown in the visual simulations (see **Figures 8.0-17** through **8.0-19** for the proposed project, and **Figures 8.0-20** through **8.0-22** for the applicant's alternative), development of the proposed structures would partially obscure mountain views to the north of the project site, while removal of existing vegetation would open currently obstructed mountain views. The degree of view obstruction from the applicant's alternative is less than for the proposed project as viewed from the State/Hitchcock intersection (Location 1). Views from Location 2 would be relatively similar for either project. Views from Location 3 (**Figures 8.0-19** and **8.0-22**) would be similar, and would not impact mountain views, as no such views currently exist. For the most part, the residential condominium portions of either project would be located below the top of the mountains and allow for views of the mountains similar to those that presently exist.

Proposed Project

The proposed project would construct a new hotel (one structure) and residential condominiums (23 total structures) ranging in height from two to three stories. As proposed, the maximum height of the buildings would be 44 feet 6 inches and would be within the 45-foot height limit as established by the project site's zoning (S-D-2). The buildings would be set back from State Street by 20 feet. The proposed project would require the removal of all existing vegetation within the main project site, including a number of mature palm trees, which range in height from 20 to 65 feet. The site would be revegetated in accordance with the proposed landscape plan (see **Figure 3.0-11**). **Figures 8.0-17** through **8.0-19** show the proposed project both with and without new landscape plants. As shown in these figures, development of the proposed structures would partially obscure mountain views to the north of the project site, while removal of existing vegetation would open currently obstructed mountain views.

None of the trees proposed for removal are considered a "landmark," "specimen," or "historic" tree by the City.²⁴ The Municipal Code prohibits the removal of certain trees without a permit.²⁵ Many of the trees on site are considered "skyline" trees (55- to 65-foot tall Mexican Fan palms [*Washingtonia robusta*] and a 25- to 30-foot-tall blue atlas cedar (*Cedrus Atlantica 'Glauca'*) tree located at the front of the exiting hotel property).

²⁴ City of Santa Barbara, Municipal Code, Section 15.24.020, "Preservation of Trees," *Definitions*.

²⁵ *Ibid*, Section 15.24.020, "Prohibition."

The Mexican Fan palm trees are not provided any specific protection under the Municipal Code due to their location outside the front setback. The mature blue atlas cedar tree located at the front of the exiting hotel property within the proposed open space area between the garage ramp for the residential condominiums and the shared driveway is located within the front setback area and requires the approval of a Tree Removal Permit by the City's Park and Recreation Commission. The applicant has submitted an application to the City's Park and Recreation Commission²⁶ for removal of trees within the front setback.

As noted, landscaping would be replaced in accordance with the proposed landscape plan (see **Figure 3.0-11**). The proposed landscape plan plant palette lists a variety of trees that could be utilized. Depending upon the specific species selected, new trees planted as part of the proposed project landscaping would contribute to the aesthetics of the site and result in a variety of tree heights. The future heights of trees will depend upon landscaping maintenance practices. While several of the tree species listed can reach heights of 60 to 90 feet at full maturity and could be considered "skyline trees," it is anticipated that future landscape practices and limitations on root growth will restrict the future heights to approximately the rooflines of the proposed buildings (25 to 35 feet).

The applicant has indicated that, to the degree feasible, some mature palm trees would be relocated on site. It should be noted that due to the proximity of the proposed underground parking structures for both the hotel and residential condominiums, the ability to relocate large trees may be limited due to the lack of planting space for root balls. As proposed, the roof of the parking structures would be approximately 6 feet or less below ground surface, which may preclude the placement of trees with large root balls. Feasibility of relocating trees on site will be examined by an arborist prior to any relocations.

As shown in the massing diagrams (see **Figure 8.0-12** [Locations 2 and 3]), the proposed hotel building would obstruct views of the mountains. For the most part, the residential condominium portions of the proposed project are located below the top of the mountains and allow for views of the mountains to be seen similar to those today. As shown in the visual simulation, development of the structures associated with the proposed project would partially obscure mountain views to the north of the project site; while removal of existing vegetation would open currently obstructed mountain views (see **Figures 8.0-17** through **8.0-19**).

The proposed new hotel structure would obscure partial mountain views available between the trunks of mature palm trees from Location 1. Additionally, the proposed new hotel structure would fully obscure partial mountain views currently available between the trunks of mature palm trees in the western

²⁶ Tree Removal Application – Front Yard Setback, submitted by Kellogg Associates, LLC, February 9, 2009.

portion of the project site from Location 2, while removal of existing trees would open new mountain views across the eastern portion of the project site. Mountain views from Location 3 are currently obscured by existing mature vegetation; the proposed new hotel structure would continue to obscure these views. This overall change would constitute a substantial alteration of the existing views available across the project site.

The Conservation Element lists the following policies and implementation strategies that would be applicable to the proposed project and the project site:

3.0 New development shall not obstruct scenic view corridors, including those of the ocean and lower elevations of the City viewed respectively from the shoreline and upper foothills, and of the upper foothills and mountains viewed respectively from the beach and lower elevations of the City.

Analysis: The proposed project would obstruct scenic views of the Santa Ynez Mountains as viewed from along selected viewpoints on State Street. Specifically, the proposed hotel would block views of the mountains from the intersection of Hitchcock Way and State Street. This is due primarily to the mass of the hotel and the fact that the hotel has a third story reaching almost 45 feet in height located within 50 feet of State Street. The residential condominium portion of the project does not obstruct views of the mountains as viewed from State Street because these buildings have a maximum height of 31 feet and all third-story elements are setback at least 85 feet from State Street.

4.0 Trees enhance the general appearance of the City's landscape and should be preserved and protected.

Analysis: The proposed project would remove the existing trees from the project site. While the landscape plan (see **Figure 3.0-11**) does provide for some trees to be replanted on site, the loss of mature trees, including prominent skyline trees, would not be consistent with this policy. The applicant has provided additional information indicating that 141 existing trees, mostly mature palms, would be preserved in place or relocated as part of project landscaping which would be consistent with this policy.

4.1 Mature trees should be integrated into project design rather than removed. The Tree Ordinance should be reviewed to ensure adequate provision for review of protection measures proposed for the preservation of trees in the project design.

Analysis: The proposed project would remove all of the existing trees from the project site. While the landscape plan (see **Figure 3.0-11**) does provide for some trees to be replanted, the loss of mature trees, including prominent skyline trees, would ~~not be~~ potentially inconsistent with this implementation strategy policy. Relocating mature trees on site may not be feasible due to the proximity of the underground parking structure,

depending on the amount of root space available and the ability of the underground structures to support the weight of the trees. However, the applicant has provided additional information indicating that 141 existing trees, mostly mature palms, would be preserved in place or relocated as part of project landscaping, which would be consistent with this implementation strategy.

4.2 All feasible options should be exhausted prior to the removal of trees.

Analysis: The proposed project would remove all of the existing trees from the project site in order to construct the underground parking garages. While the landscape plan (see **Figure 3.0-11**) does provide for a number of new trees to be planted and for some trees to be replanted, the loss of mature trees, including prominent skyline trees, would ~~not be~~ potentially inconsistent with this implementation strategy policy. The proposed site plan requires the removal of all existing trees in order to construct the underground parking structures. Replanting those mature trees on site may not be feasible due to the proximity of the underground parking structure, depending on the amount of root space available and the ability of the underground structures to support the weight of the trees. However, the applicant has provided additional information indicating that 141 existing trees, mostly mature palms, would be preserved in place or relocated as part of project landscaping, which would be consistent with this implementation strategy.

4.3 Major trees removed as a result of development or other property improvement shall be replaced by specimen trees on a minimum one-for-one basis.

Analysis: As noted above, the proposed project would remove all of the existing trees from the project site. While the landscape plan (see **Figure 3.0-11**) does provide for a number of trees to be planted and for some existing trees to be replanted on site, the proposed new trees are smaller than existing trees due to constraints of the underground parking garage and the intent to plant trees that would not block mountain views. Therefore, the loss of mature trees, including prominent skyline trees, would ~~not be~~ potentially inconsistent with this implementation strategy policy. However, the applicant has provided additional information indicating that 141 existing trees, mostly mature palms, would be preserved in place or relocated as part of project landscaping, which would be consistent with this implementation strategy.

An analysis of the USSS recommendations regarding the preservation of mountain views as they apply to the proposed project is provided below:²⁷

1. **Building Height Limits.** Retain and enforce current height limits for buildings in the S-D-2 zone with special findings for three-story buildings. The findings would provide that a three-story building can only be supported in the event that a development proposal has important tradeoffs or provides important community benefits such as preservation or creation mountain views, provision of creek buffers, enhanced pedestrian streetscape amenities, placement of parking underground in combination with substantial open space, or other improved design features identified in the amended *Upper State Street Area Design Guidelines*.

Analysis: The proposed project would be consistent with the requirements of the S-D-2 zone. The proposed project does include a third story; however, it provides the following trade-offs or benefits in support of the three-story development: underground parking for both the hotel and residential condominium portions of the project, and enhanced pedestrian streetscape amenities (paving at State/Hitchcock intersection. However, the hotel portions do obstruct certain views of the Santa Ynez Mountains. Determination of whether the amenities provided are an adequate trade-off for the third story is ultimately a decision for the Planning Commission.

2. **View Corridors.** Existing view corridors should be protected or new view corridors created when siting new buildings, parking and streetscapes.

Analysis: The proposed project does provide for a new view corridor from State Street that affords views of the mountains to the north. The site design includes a landscaped driveway that cuts through the project to separate the hotel and residential condominiums. This driveway provides for views of the Santa Ynez Mountains from public viewpoints along State Street. However, the existing view corridor at the State/Hitchcock intersection is reduced due to the location and height of the new hotel building.

3. **Step Buildings.** Encourage developments to step second and third floor stories back to allow views to the north.

Analysis: The proposed project does step the hotel building back from State Street. As designed, the proposed hotel includes two story development within 30 feet of State Street with the third story stepped back an additional 20 feet (for a total of 50 feet). From the western property line (adjacent to the commercial driveway opposite the terminus of Hitchcock Way), the proposed hotel would be set back 5 feet (first floor) and 12 feet (second and

²⁷ City of Santa Barbara, *Upper State Street Study Report*, prepared by the Planning Division, March 2007, 3-10 and 3-11.

third floors). However, as illustrated in the massing diagrams (see **Figure 8.0-12**) the proposed hotel obstructs views of the mountains despite this stepping back of the mass from State Street and the western property line. The proposed three-story residential condominiums are set back at least 85 feet from State Street and only two-story structures front on State Street. As a result, views of the mountains in the background (see **Figure 8.0-18**) are provided behind the residential condominiums.

4. **Intersection Views.** Consider the preservation of views at corners that intersect with State Street. Corner buildings at intersections can be designed to preserve or minimize the change in the existing views.

Analysis: As noted above, the proposed project would obstruct views at the State/Hitchcock intersection as a result of the mass and third story of the proposed hotel portion of the project (see **Figures 8.0-12** and **8.0-17**). The residential condominiums do not obstruct mountain views at the intersection.

5. **Parking Placement.** Parking in front of buildings along the north or south side of State Street could be supported if the design allows for preserving view corridors on the north or viewing locations on the south, and is designed to provide visual screening with landscaping or other features.

Analysis: The proposed project does not include parking in front of the proposed hotel or residential condominiums along State Street. Parking is proposed in underground parking structures with some limited parking (17 spaces) along the driveway on the condominium parcel.

6. **Viewing Locations.** Redevelopment of parking lots on the south side of State Street must consider lost opportunities for views to the north.

Analysis: The proposed project is located on the north side of State Street and this policy does not apply.

7. **Landscaping and Trees.** Consideration shall be given to landscaping plans so that views are framed but not substantially blocked by vegetation.

Analysis: The proposed project provides for landscaping that affords views and does not obstruct views of the Santa Ynez Mountains (see **Figures 8.0-11** and **8.0-18**).

Conclusion

As a result of the proposed project, views of the mountains across the project site would be obstructed from key viewpoints (most important, the intersection of Hitchcock Way and State Street) by the mass of

the second and third story of the proposed hotel. Other views would be generally similar to existing views, and a new view corridor would be opened up along the proposed hotel driveway. From an environmental standpoint, although scenic views of the mountains would be obstructed at some public viewing areas along State Street, other views would be opened up through the removal of mature landscaping. Therefore, the proposed project would result in an adverse but *less than significant* impact on the environment (Class III) relative to public scenic views. This determination is based on weighing all of the applicable policies and thresholds and analyzing the project both qualitatively and quantitatively.

Nevertheless, the City, in its review and consideration of the development application permits associated with the proposed project, including review and consideration of its design for consistency with City land use and design policies, may choose to further address any scenic view effects associated with the proposed project.

As a result of the loss of prominent (skyline and mature) trees, and due to complete removal and no replacement of significant vegetation, scenic views from along State Street and the aesthetics of the site would be substantially altered. As a result, the proposed project would result in *potentially significant* impacts (Class II); however, with mitigation these impacts could be reduced to a *less than significant* level. It should be noted, as previously discussed, that mitigation to replant mature trees on site may not be feasible due to the proximity of the underground parking structure, depending on the amount of root space available and the ability of the underground structures to support the weight of the trees.

Applicant's Alternative

The applicant's alternative would construct new two two-story office buildings and 73 residential condominiums (24 total two- and three-story buildings). As proposed, the maximum height of the buildings would be 31 feet and would be within the 45-foot height limit as established by the project site's zoning (S-D-2). The buildings would be set back from State Street by 20 feet for the office buildings and 80 feet for the residential condominiums.

The applicant's alternative also includes the removal of all existing vegetation within the main project site, including a number of mature palm trees, which range in height from 20 to 65 feet. The site would be revegetated in accordance with the proposed landscape plan (see **Figure 3.0-15**). **Figures 8.0-20 through 8.0-22** show the applicant's alternative both with and without new landscape plants. As shown in these figures, development of the proposed structures would partially obscure mountain views to the north of the project site, while removal of existing vegetation would open currently obstructed mountain views.

None of the trees proposed for removal are considered a "landmark," "specimen," or "historic" tree by the City. However, many of the trees are considered "skyline" trees (55 to 65 foot tall Mexican Fan palms

[*Washingtonia robusta*] and a 25- to 30-foot-tall mature blue atlas cedar [*Cedrus Atlantica 'Glauca'*] tree located at the front of the exiting hotel property).

The Mexican Fan palm trees are not provided any specific protection under the Municipal Code due to their location outside the front setback. The mature blue atlas cedar tree located at the front of the property within the proposed open space area, between the garage ramp for the residential condominiums and the westerly driveway, is located within the front yard setback area and requires the approval of a Tree Removal Permit by the City's Park and Recreation Commission.²⁸ The applicant has submitted an application to the City's Park and Recreation Commission for removal of trees within the front setback.²⁹

As noted, landscaping would be replaced in accordance with the proposed landscape plan (see **Figure 3.0-15**). The proposed landscape plan plant palette lists a variety of trees that could be utilized; depending upon the specific species selected, new trees planted as part of the proposed project landscape will contribute to the aesthetics of the site and result in a variety of tree heights. The future heights of trees will depend upon landscaping maintenance practices. While several of the tree species listed can reach heights of 60 to 90 feet at full maturity and could be considered "skyline trees," it is anticipated that future landscape practices and limitations on root growth will restrict the future heights to approximately the rooflines of the proposed buildings (25 to 35 feet).

The applicant has indicated, to the degree feasible, some mature palm trees would be relocated on site. It should be noted that due to the proximity of the proposed underground parking structures for the residential condominiums, the ability to relocate large trees on the condominium parcel may be limited due to the lack of planting space for root balls. As proposed, the roof of the condominium's parking structure would be approximately 6 feet or less below ground surface, which may preclude the placement of trees with large root balls. Feasibility of relocating trees on site will be examined by an arborist prior to any relocations.

As shown in the massing diagrams (see **Figure 8.0-14** [Locations 2 and 3]), the ~~proposed~~ office buildings obstruct views of the mountains. For the most part, the residential condominium portions of the applicant's alternative are located below the top of the mountains and allow for views of the mountains to be seen similar to those today. As shown in the visual simulation, development of the proposed structures associated with the applicant's alternative would partially obscure mountain views to the

²⁸ Tree Removal Application – Front Yard Setback, submitted by Kellog Associates, LLC, February 9, 2009.

²⁹ Ibid.

north of the project site (although to a lesser extent than the proposed project), while removal of existing vegetation would open currently obstructed mountain views (see **Figures 8.0-20** through **8.0-22**).

As viewed from Location 1, the ~~proposed~~ office development would partially obscure mountain views currently available between the trunks of mature palm trees; however, as a result of the removal of some landscaping, views would be somewhat improved of the mountain north of the ~~proposed~~ office buildings. The impact on views from this location would be less than that of the proposed project. Additionally, the ~~proposed office~~ office buildings would fully obscure partial mountain views currently available between the trunks of mature palm trees in the western portion of the project site from Location 2, while removal of existing trees (primarily the blue atlas cedar [*Cedrus atlantica* 'Glauca'] tree) would open new mountain views across the eastern portion of the project site. The impact on views from this location would be generally similar to that of the proposed project. Mountain views from Location 3 are currently obscured by existing mature vegetation. The ~~proposed office~~ office buildings would continue to obscure these views. The impact on views from this location would be generally similar to that of the proposed project. The Conservation Element lists the following policies and implementation strategies that would be applicable to the applicant's alternative and the project site:

3.0 New development shall not obstruct scenic view corridors, including those of the ocean and lower elevations of the City viewed respectively from the shoreline and upper foothills, and of the upper foothills and mountains viewed respectively from the beach and lower elevations of the City.

Analysis: Although the ~~proposed office~~ office buildings are two stories, they would allow views of the Santa Ynez Mountains from selected viewpoints on State Street. As shown in **Figures 8.0-14**, **8.0-20**, and **8.0-21**, the office buildings do partially obstruct the views of the mountains to the north. The residential condominium portion of the project does not obstruct views of the mountains as viewed from State Street.

4.0 Trees enhance the general appearance of the City's landscape and should be preserved and protected.

Analysis: The applicant's alternative would remove the existing trees from the project site. While the landscape plan (see **Figure 3.0-15**) does provide for some trees to be replanted on site, the loss of mature trees, including prominent skyline trees, would ~~not be potentially inconsistent with this policy. However, the applicant has provided additional information indicating that 141 existing trees, mostly mature palms, would be preserved in place or relocated as part of project landscaping, which would be consistent with this policy.~~

4.1 Mature trees should be integrated into project design rather than removed. The Tree Ordinance should be reviewed to ensure adequate provision for review of protection measures proposed for the preservation of trees in the project design.

Analysis: The applicant's alternative would remove the existing trees from the project site. While the landscape plan (see **Figure 3.0-15**) does provide for some new trees to be planted, the loss of mature trees, including prominent skyline trees, would ~~not be~~ potentially inconsistent with this ~~policy implementation strategy~~. Relocating mature trees on site may not be feasible due to the proximity of the underground parking structure, depending on the amount of root space and available the ability of the underground structures to support the weight of the trees. However, the applicant has provided additional information indicating that 141 existing trees, mostly mature palms, would be preserved in place or relocated as part of project landscaping, which would be consistent with this implementation strategy.

4.2 All feasible options should be exhausted prior to the removal of trees.

Analysis: As noted above, the applicant's alternative would remove all of the existing trees from the project site. While the landscape plan (see **Figure 3.0-15**) does provide for a number of new trees to be planted and for some trees to be replanted, the loss of mature trees, including prominent skyline trees, would ~~not be~~ potentially inconsistent with this ~~policy implementation strategy~~. The applicant's alternative includes removal of all existing trees, most of which are in order to construct the underground residential parking structure. Additionally, replanting those mature trees on site may not be feasible in areas above the proposed parking structure depending on the amount of root space available and the ability of the underground structure to support the weight of the trees. However, the applicant has provided additional information indicating that 141 existing trees, mostly mature palms, would be preserved in place or relocated as part of project landscaping, which would be consistent with this implementation strategy.

4.3 Major trees removed as a result of development or other property improvement shall be replaced by specimen trees on a minimum one-for-one basis.

Analysis: As noted above, the applicant's alternative would remove all of the existing trees from the project site. While the landscape plan (see **Figure 3.0-15**) does provide for a number of new trees to be planted and for some trees to be replanted on site, the new trees are smaller than the existing trees due both to constraints of the underground parking garage and to the intent of the landscape design to plant trees that would not block mountain views. Therefore, the loss of mature trees, including prominent skyline trees, would ~~not~~

be potentially inconsistent with this implementation strategy policy. However, the applicant has provided additional information indicating that 141 existing trees, mostly mature palms, would be preserved in place or relocated as part of project landscaping, which would be consistent with this implementation strategy.

An analysis of the USSS recommendations regarding the preservation of mountain views as they apply to the applicant's alternative are provide below:³⁰

1. **Building Height Limits.** Retain and enforce current height limits for buildings in the S-D-2 zone with special findings for three-story buildings. The findings would provide that a three-story building can only be supported in the event that a development proposal has important tradeoffs or provides important community benefits such as preservation or creation mountain views, provision of creek buffers, enhanced pedestrian streetscape amenities, placement of parking underground in combination with substantial open space, or other improved design features identified in the amended *Upper State Street Area Design Guidelines*.

Analysis: The applicant's alternative is consistent with the requirements of the S-D-2 zone in that the buildings do not exceed three stories or 45 feet in height. The ~~proposed office~~office buildings are two stories in height and the residential condominiums range from two to three stories. Parking consistent with the S-D-2 zone is proposed for both the office buildings and the residential condominiums. The following trade-offs or benefits are provided by the project in support of the three-story residential development: underground parking and enhanced pedestrian streetscape amenities (paving at Hitchcock Way/State Street intersection).

As shown in **Figures 8.0-14, 8.0-20, and 8.0-21**, the office buildings do partially obstruct the views of the mountains to the north. The residential condominium portion of the project does not obstruct views of the mountains as viewed from State Street. These buildings are setback at least 85 feet from State Street. Determination of whether the amenities provided are an adequate trade-off for the third story is ultimately a decision for the Planning Commission.

2. **View Corridors.** Existing view corridors should be protected or new view corridors created when siting new buildings, parking and streetscapes.

Analysis: The applicant's alternative does provide for view corridors from State Street that afford views of the mountains to the north. The site design includes a landscaped driveway that

³⁰ City of Santa Barbara, *Upper State Street Study Report*, prepared by the Planning Division, March 2007, 3-10 and 3-11.

cuts through the project to separate the office buildings and residential condominiums. This driveway provides for views of the Santa Ynez Mountains from public viewpoints along State Street.

3. **Step Buildings.** Encourage developments to step second and third floor stories back to allow views to the north.

Analysis: The applicant's alternative does not step the upper floors back from State Street. As designed, the ~~proposed office~~ office buildings include two-story development within 20 feet of State Street and approximately 6 feet from the western property line. As illustrated in the massing diagrams (see **Figure 8.0-1**) the ~~proposed office~~ office buildings partially obstruct views of the mountains. However, as shown in the visual simulations, views from the State Street/Hitchcock Way intersection to the north are provided behind the office buildings, across the at-grade parking lot. The proposed residential condominiums are setback at least 85 feet from the Street. As a result, views of the mountains in the background (see **Figure 8.0-21**) are provided.

4. **Intersection Views.** Consider the preservation of views at corners that intersect with State Street. Corner buildings at intersections can be designed to preserve or minimize the change in the existing views.

Analysis: As noted above, the applicant's alternative would partially obstruct mountain views at the State/Hitchcock intersection. However, the roof line of the office buildings as viewed from the intersection of Hitchcock Way and State Street parallels the top of the mountains and does not fully interrupt the view from this intersection (see **Figures 8.0-14** and **8.0-20**). The residential condominiums do not obstruct mountain views.

5. **Parking Placement.** Parking in front of buildings along the north or south side of State Street could be supported if the design allows for preserving view corridors on the north or viewing locations on the south, and is designed to provide visual screening with landscaping or other features.

Analysis: The applicant's alternative does not include parking in front of the ~~proposed office~~ offices or residential condominiums along State Street. Parking is primarily provided behind the office buildings (at-grade) and in an underground parking structure for the residential condominium, with some limited parking (nine spaces) along the driveway on the condominium parcel.

6. **Viewing Locations.** Redevelopment of parking lots on the south side of State Street must consider lost opportunities for views to the north.

Analysis: The project is located on the north side of State Street and this policy does not apply.

7. **Landscaping and Trees.** Consideration shall be given to landscaping plans so that views are framed but not substantially blocked by vegetation.

Analysis: The applicant's alternative provides for landscaping that frames and does not obstruct views of the Santa Ynez Mountains (see **Figures 8.0-15 and 8.0-21**).

Although the applicant's alternative would obscure some mountain views, the removal of large trees from the front of the project site would make other views available. While the removal of existing vegetation on the project site would potentially result in the loss of skyline trees, some mature palm trees (Mexican fan palms) would be relocated (to the degree feasible) on site as part of site landscaping and would be located to frame mountain views. The extent to which mountain views across the project site is reduced under the applicant's alternative, and the adverse effect on views is less than that of the proposed project.

Conclusion

As a result of the applicant's alternative, views of the mountains across the project site would be generally similar to existing views, although the nature of the view would change (view blockage by buildings rather than landscaping). From an environmental standpoint, no substantial adverse change in scenic views of the mountains from public viewing areas along State Street would occur. Therefore, the applicant's alternative would result in a *less than significant* impact on the environment (Class III) relative to public scenic views.

Nevertheless, the City, in its review and consideration of the development application permits associated with the proposed project, including review and consideration of its design for consistency with City land use and design policies, may choose to further address any scenic view effects associated with the proposed project.

As a result of the loss of prominent (skyline and mature) trees, and due to complete removal and no replacement of significant vegetation, scenic views from along State Street and the aesthetics of the site would be substantially altered. As a result, the applicant's alternative would result in *potentially significant* impacts (Class II); however, with mitigation these impacts could be reduced to a *less than significant* level. It should be noted, as previously discussed, that mitigation to replant mature trees on site may not be feasible due to the proximity of the underground parking structure, depending on the amount of root space available and the ability of the underground structures to support the weight of the trees.

Scenic Highways

The *City of Santa Barbara General Plan*, as previously discussed, lists designated, eligible, and proposed state and City scenic drives. The project site is not located on or visible from a designated scenic highway. The nearest scenic highways are State Route 154 (state designated), approximately 0.85 mile west of the site, and US Highway 101 (state eligible), approximately 0.6 mile west and south of the site. The project site is not visible from these roadways and they would not be affected by development of the proposed project or the applicant's alternative. There would be *no impact*.

8.7.2 Have a demonstrable negative aesthetic effect in that it is inconsistent with Architectural Board of Review or Historic Landmarks Guidelines or guidelines/criteria adopted as part of the Local Coastal Program?

Consistency with the Architectural Board of Review Guidelines

Proposed Project

The proposed project would develop a 106-room hotel and 73 residential condominium units. The proposed new structures would use Mediterranean architectural styles and color palettes, and would be generally consistent with surrounding uses and the architectural styles found in the North State neighborhood and west State Street visual corridor.

In addition to the ABR design guidelines, the *City of Santa Barbara General Plan* provides goals and policies that encourage new development to be planned consistent with existing City uses and to preserve important views and skyline trees, which are discussed in the previous section. In addition to the goals and policies contained in the general plan, the proposed project lies within the Upper State Street area, and is subject to the *Upper State Street Area Design Guidelines* and the recommendations of the USSS. An analysis of the proposed project's consistency with the general plan and the USSS is provided in **Section 5.0, Land Use and Policy Consistency**, of this EIR. **Appendix 8.0, Consistency Analysis with Architectural Board of Review Guidelines**, provides a review of and discusses the proposed project's consistency with the ABR design guidelines.

The *ABR Guidelines* include policies intended to create pleasing designs that are well-suited to the area and compatible with surrounding development. Specifically, policies applicable to the proposed project call for: development to be integrated with the site and surrounding area; architectural styles to be used consistently throughout the development; high quality materials to be used; utility equipment to be screened; energy efficient and green building design is encouraged and natural lighting systems are encouraged; visual interest and harmony with surrounding development is encouraged; and landscape

plans should preserve mature trees, use water-efficient species, create private and shared outdoor areas, screen undesirable views and compliment the architecture.

The proposed project would use Mediterranean architectural styles throughout the commercial and residential portions, which would be suited to the area. The project site is located in an area of primarily commercial development, and would be generally consistent with surrounding development. Building materials would be selected to meet City standards and would be high quality. The proposed project would screen utility areas for trash collection and commercial equipment, and rooftop equipment would likewise be screened by roof parapets. The proposed structures are oriented to maximize natural lighting during daytime hours, and proposed landscaping would provide natural cooling. Adequate sun exposure would be available to make the future installation of solar energy and lighting systems feasible. The proposed project would comply with the City's energy efficiency standards for commercial and residential development. The proposed project includes green building features, which are discussed in **Table 10.0-3**. The landscape plans for the proposed project include shared open space areas, private outdoor living space, vegetation to soften building edges and screen undesirable views, and small recreational turf areas. The plant palette incorporates water-efficient plant species. The proposed project would provide street trees and a landscaped buffer area along State Street, and includes planting areas to separate pedestrian and vehicular traffic along the shared driveway. In order to accommodate site grading and excavation for the proposed underground parking garages, all existing site vegetation would need to be removed. The landscaping plan for the proposed project calls for the reuse of mature trees to the extent feasible, but the proposed project could potentially result in the complete removal of mature trees, and is therefore potentially inconsistent with City policies related to the preservation of mature trees.

Conclusion

The proposed project is consistent with the *ABR Guidelines* for architectural review except for those regarding the preservation of skyline trees, as discussed in the previous section; therefore impacts related to tree removal would be *potentially significant* (Class II). With mitigation, these impacts could be reduced to a *less than significant* level.

Applicant's Alternative

The applicant's alternative, which proposes 14,594 gross square feet of commercial office uses and 73 residential condominiums, would use the same Mediterranean architectural styles and color palette as the proposed project; it would therefore be consistent with surrounding uses and the architectural styles found in the North State neighborhood and west State Street visual corridor.

In addition to the ABR design guidelines, the *City of Santa Barbara General Plan* provides goals and policies that encourage new development to be planned consistent with existing City uses and to preserve important views and skyline trees. The applicant's alternative lies within the Upper State Street area and is subject to the *Upper State Street Area Design Guidelines* and the recommendations of the USSS. An analysis of the proposed project consistency with the general plan and the USSS is provided in **Section 5.0, Land Use and Policy Consistency**, of this EIR. **Appendix 8.0** provides a review of and discusses the consistency of the applicant's alternative with the ABR design guidelines.

The *ABR Guidelines* include policies intended to create pleasing designs that are well-suited to the area and compatible with surrounding development. Specifically, policies that would apply to the applicant's alternative call for development to be integrated with the site and surrounding area; architectural styles to be used consistently throughout the development; high-quality materials to be used; utility equipment to be screened; energy-efficient and green building design is encouraged and natural lighting systems are encouraged; visual interest and harmony with surrounding development is encouraged; and landscape plans should preserve mature trees, use water-efficient species, create private and shared outdoor areas, screen undesirable views and compliment the architecture.

Development in the Upper State Street area is not characterized by a single architectural style. The applicant's alternative would use Mediterranean architectural styles throughout the residential and commercial portions, which would be suited to the area. The project site is located in an area of primarily commercial development, and the proposed development would be generally consistent with surrounding development. Building materials would be selected to meet City standards and would be high quality. The applicant's alternative would screen utility areas for trash collection and commercial equipment, and rooftop equipment would likewise be screened by roof parapets. The proposed structures are oriented to maximize natural lighting during daytime hours, and proposed landscaping would provide natural cooling. Adequate sun exposure would be available to make the future installation of solar energy and lighting systems feasible. The applicant's alternative would comply with the City's energy-efficiency standards for commercial and residential development. The applicant's alternative includes green building features, which are discussed in **Table 10.0-3**. The landscape plans for the applicant's alternative include shared open space areas, private outdoor living spaces, vegetation to soften building edges and screen undesirable views, and small recreational turf areas. The plant palette incorporates water-efficient plant species. The applicant's alternative would provide street trees and a landscaped buffer area along State Street, and includes planting areas to separate pedestrian and vehicular traffic along the shared driveway. In order to accommodate site grading and excavation for the proposed underground parking garage, all existing site vegetation is proposed to be removed. The landscaping plan for the applicant's alternative calls for the reuse of mature trees to the extent feasible,

but the applicant's alternative could potentially result in the complete removal of mature trees, and is therefore potentially inconsistent with City policies related to the preservation of mature trees.

Conclusion

The applicant's alternative is consistent with the applicable design standards except for those regarding the preservation of skyline trees, as discussed in the previous section; therefore, impacts related to tree removal would be *potentially significant* (Class II). With mitigation, these impacts could be reduced to a *less than significant* level.

Historic Landmarks Guidelines or guidelines/criteria adopted as part of the Local Coastal Program

The project site is approximately 2 miles from the City's coastal zone and is not located within the local coastal zone. The site also does not contain any historic landmarks nor is it located in an area subject to review by the Historic Landmarks Commission. Therefore, guidelines and criteria related to the Historic Landmarks Commission and Local Coastal Program do not apply. There would be *no impact*.

8.7.3 Mitigation Measures

The following required mitigation measures shall be implemented:

Proposed Project

Landscaping would be replaced in accordance with the proposed project's landscape plan; the applicant has indicated, to the degree feasible, some mature palm trees would be relocated on site. It should be noted that due to the proximity of the proposed underground parking structures for ~~the~~ proposed ~~the~~ hotel and residential condominiums, the ability to relocate large trees above the underground parking structures may be limited due to the lack of planting space for root balls. As proposed, the roof of the proposed parking structures would be approximately 6 feet or less below ground surface. Feasibility of relocating trees on site will be examined by an arborist prior to any relocations.

Required Mitigation

VA-1: Prior to removal of any trees, and prior to final design review, a landscape plan accommodating the relocation of existing mature palm trees, particularly those considered "skyline trees" (tall [55 to 65 foot] Mexican Fan palms [*Washingtonia robusta*]), to the ~~maximum~~ extent reasonably feasible, shall be submitted to the City arborist for

review and approval. This plan shall include planter design specifications to ensure the long-term growth and survival of the relocated trees.

VA-2: Prior to removal of any trees, the applicant shall revise the landscape plan to include one specimen replacement tree for each ~~major~~ mature tree (as determined by the City arborist) removed.

Applicant's Alternative

Landscaping would be replaced in accordance with the applicant's alternative's proposed landscape plan; the applicant has indicated, to the degree feasible, some mature palm trees would be relocated on site. It should be noted that due to the proximity of the proposed underground parking structures for the residential condominiums, the ability to relocate large trees above the underground parking structure may be limited due to the lack of planting space for root balls. As proposed, the roof of the proposed parking structures would be approximately 6 feet or less below ground surface. Feasibility of relocating trees on site will be examined by an arborist prior to any relocations.

The applicant's alternative does however provide for open space (turf) area where the existing mature blue atlas cedar (*Cedrus Atlantica 'Glauca'*) tree is located at the front of the exiting hotel between the garage ramp for the residential condominiums and the shared driveway. It may be feasible to retain this tree in its present location since there is no subsurface parking structure proposed under this open space area for the parking garage. This option is analyzed in the **Alternatives** section (9.0) of this EIR.

Required Mitigation

Mitigation Measures VA-1 and V-2 shall be implemented.

8.7.4 Residual Impacts

With the implementation of the ~~proposed~~ required mitigation measures, impacts would be *less than significant* (Class II) for either the proposed project or the applicant's alternative. Although a *less than significant* impact from an environmental perspective, the proposed project (hotel portion), and, to a lesser degree the applicant's alternative, would partially obstruct views of the Santa Ynez Mountains from the Hitchcock Way/State Street intersection and other viewpoints along State Street, thereby making it potentially inconsistent with some policies of the general plan and USSS.

8.7.5 Cumulative Long-term Visual Impacts

Cumulative impacts as defined in CEQA Section 15130 refer to the combined effect of project impacts with the impacts of other “past, present, and probable future projects.” When considered together, this development would continue the trend within the City that has resulted in the conversion of older parcels developed along this portion of State Street. The project site is located on the north side of State Street between Hope Avenue (to the west) and Ontare Road (to the east). Cumulative development projects would potentially affect other viewsheds, but would not cumulatively act to exacerbate project-specific impacts. Based on the above, no cumulative impacts are expected with respect to these viewing audiences.

When viewed from a distance, the project site would be visible to observers at higher elevations. From such viewing locations, redevelopment of the project would cumulatively act with other residential and commercial projects that are proposed or reasonably foreseeable and blend with the existing development of the North State and San Rogue neighborhoods. The net effect of this cumulative development from these viewing locations would be the continuation of an urban setting. All proposed cumulative development would occur in areas already dominated by urban land uses or below ridgelines, where it would not alter the visual backdrop of the City. Based on the above, *less than significant* (Class III) cumulative impacts on the visual resources are expected after mitigation with respect to viewing audiences.

8.8 SUMMARY OF VISUAL AESTHETIC IMPACTS

The proposed project and the applicant’s alternative would both result in a change to the aesthetics of the site. ~~Either~~ Both the proposed project and the applicant’s alternative would partially obstruct views of the mountains; however, the removal of existing landscape trees would open up currently obstructed views. The proposed project (hotel portion) would obstruct views of the Santa Ynez Mountains from key locations (most important, the Hitchcock Way and State Street intersection). However, due to the creation of a view corridor and the removal of vegetation that currently blocks views, this change is considered adverse, but not significant in terms of environmental thresholds. The proposed project’s residential development would not significantly block mountain views. The applicant’s alternative (both the office and residential components) would change views of the mountains; however, due to the creation of a view corridor and the removal of vegetation that currently blocks views, this change is not considered significant in terms of environmental thresholds. Impacts are considered adverse, but *less than significant* (Class III) for both the proposed project and the applicant’s alternative with regards to the loss of scenic views.

The loss of all on-site trees and lack of significant replacement vegetation is considered a *potentially significant, mitigable* (Class II) impact for both the proposed project and the applicant's alternative. Identified mitigation measures would ensure that skyline trees are relocated on site and adequate replacement trees are included in the landscape plan.

Both the proposed project and applicant's alternative are generally consistent with ABR's guidelines. The proposed project (hotel portion) would partially obstruct views of the Santa Ynez Mountains from the Hitchcock Way and State Street intersection, thereby making it potentially inconsistent with some policies of the USSS.



SOURCE: Impact Sciences, Inc. – January 2009

FIGURE 8.0-1

Surrounding Development Photograph Locations



Location 1 - Looking Northeast
State Street at Hope Road



Location 2 - Looking Northwest
State Street West of Project Site



Location 2 - Looking Northeast
State Street West of Project Site



Location 3 - Looking Northwest
Hitchcock Way at State Street



Location 3 - Looking Northeast
Hitchcock Way at State Street



Location 4 - Looking Northwest
State Street at East Project Driveway

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-2



1012-001•01/09

Surrounding Development - North of State Street



Location 4 - Looking Northeast
State Street at East Project Driveway



Location 5 - Looking Northwest
State Street at San Roque Creek



Location 5 - Looking Northeast
State Street at San Roque Creek



Location 6 - Looking Northwest
State Street East of Project Site



Location 6 - Looking Northeast
State Street East of Project Site



Location 7 - Looking Northwest
State Street at Ontare Road

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-3

Surrounding Development - North of State Street



Location 8 - Looking Southeast
State Street at Hope Road



Location 9 - Looking Southwest
State Street West of Project Site



Location 9 - Looking Southeast
State Street West of Project Site



Location 10 - Looking Southwest
State Street at Hitchcock Way



Location 10 - Looking Southeast
State Street at Hitchcock Way



Location 11 - Looking Southwest
State Street at East Project Driveway

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-4

Surrounding Development - South of State Street



Location 11 - Looking Southeast
State Street at East Project Driveway



Location 12 - Looking Southwest
State Street at San Roque Creek



Location 12 - Looking Southeast
State Street at San Roque Creek



Location 13 - Looking Southwest
State Street East of Project Site



Location 13 - Looking Southeast
State Street East of Project Site



Location 14 - Looking Southwest
State Street at Ontare Road

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-5



1012-001•01/09

Surrounding Development - South of State Street



SOURCE: Impact Sciences, Inc. – January 2009

FIGURE **8.0-6**

Existing Project Site Photograph Locations



Location 1 - Existing Restaurant and On-Site Commercial Uses (Nail Salon)



Location 2 - Existing West Driveway and On-Site Commercial Uses and Hotel Office



Location 3 - Existing East Driveway and Hotel



Existing On-Site Restaurant



Existing Hotel Office



Existing On-Site Commercial Use (Nail Salon)

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-8a

Existing On-Site Photographs





Hotel Entrance, Single Story Hotel Units, Pool and Driveway



Two Story Hotel Units

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-8b

Existing On-Site Photographs





SOURCE: Impact Sciences, Inc. – January 2009

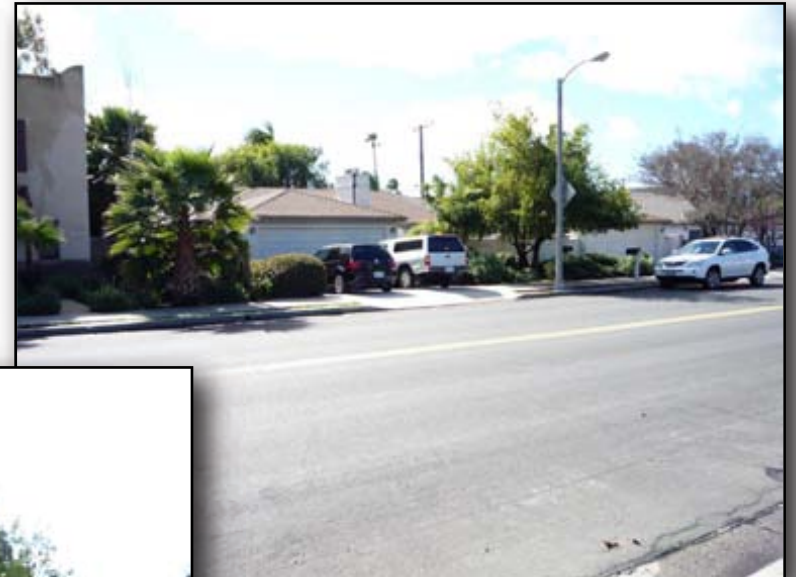
FIGURE 8.0-9

Town and Country Apartment Photographs

View from the West



View from the East



Center View

SOURCE: Impact Sciences, Inc. – February 2009

FIGURE 8.0-10

3715 San Remo Drive Duplex Photographs



SOURCE: Impact Sciences, Inc. – January 2009

FIGURE 8.0-11

Massing Diagram Photograph Locations



Location 1 - Existing
State Street at Hope Road



Location 2 - Existing
State Street at Hitchcock Way



Location 3 - Existing
State Street at Project Site



Location 1 - Proposed Project



Location 2 - Proposed Project



Location 3 - Proposed Project

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-12

Proposed Project Massing Diagrams - Locations 1-3





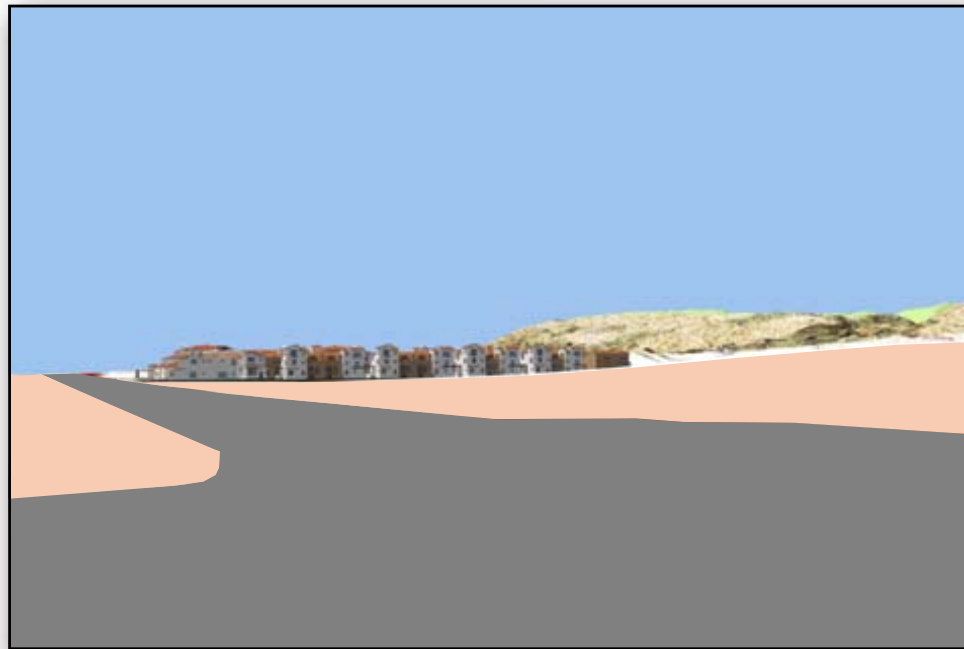
Location 4 - Existing
State Street at Ontare Road



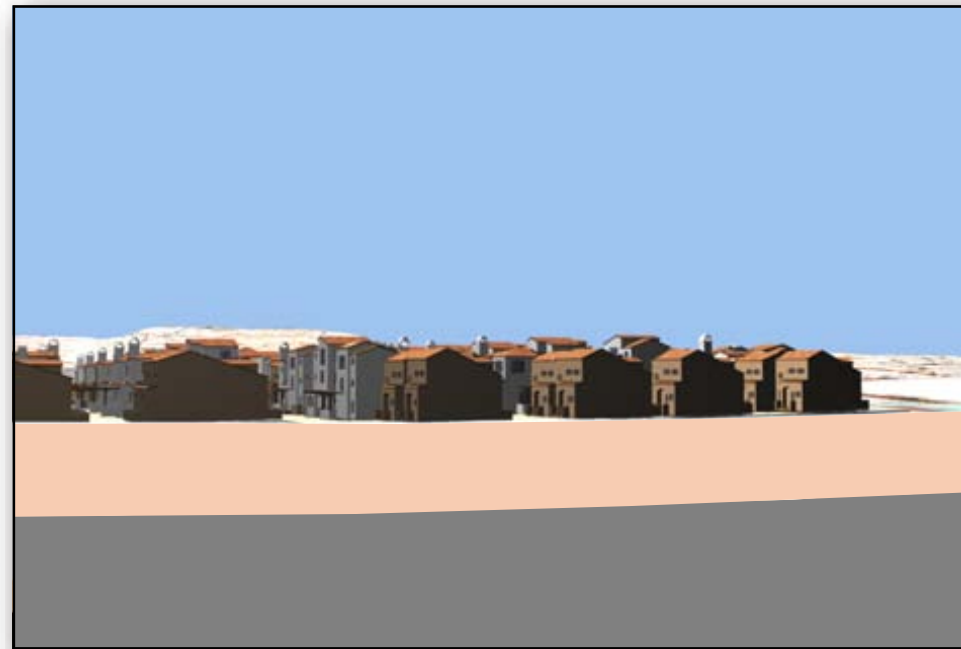
Location 5 - Existing
San Remo Drive at Grove Lane



Location 6 - Existing
San Remo Drive at T&C Apartments



Location 4 - Proposed Project



Location 5 - Proposed Project



Location 6 - Proposed Project

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-13



1012-001•01/09

Proposed Project Massing Diagrams - Locations 4-6



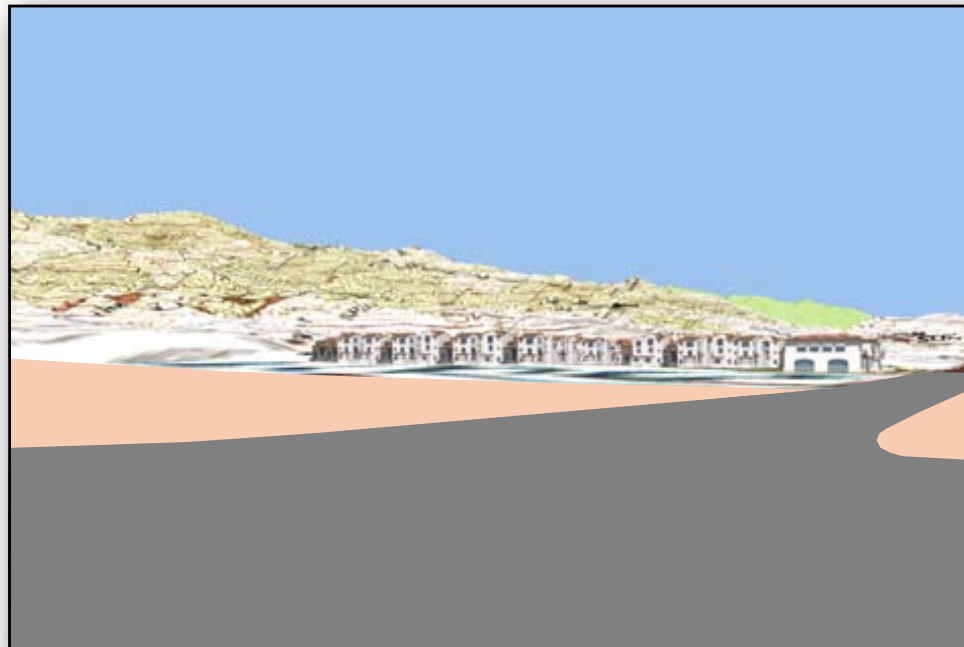
Location 1 - Existing
State Street at Hope Road



Location 2 - Existing
State Street at Hitchcock Way



Location 3 - Existing
State Street at Project Site



Location 1 - Applicant's Alternative



Location 2 - Applicant's Alternative



Location 3 - Applicant's Alternative

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-14

Applicant's Alternative Massing Diagrams - Locations 1-3





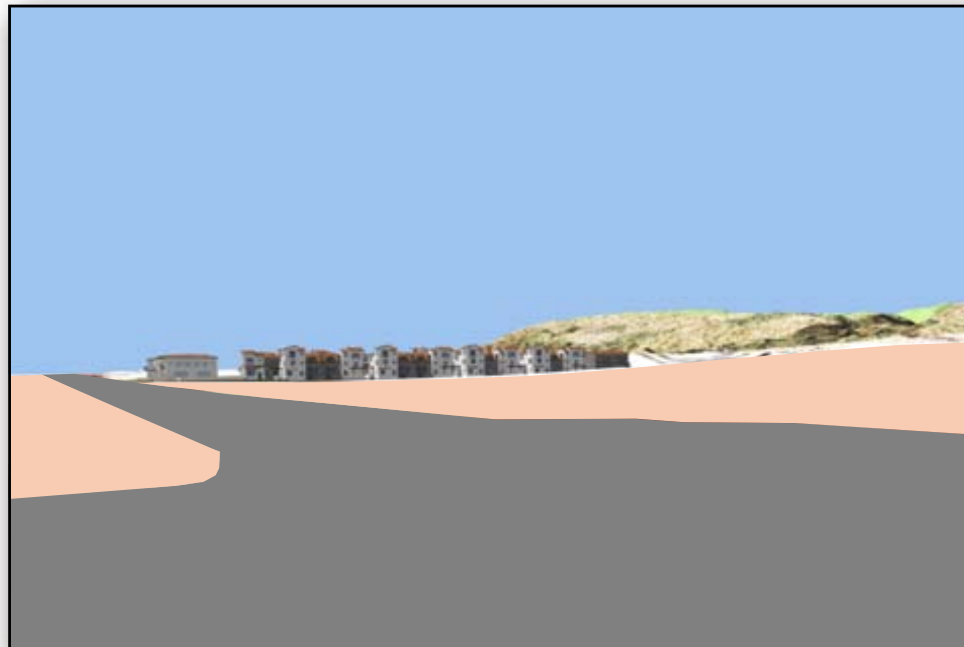
Location 4 - Existing
State Street at Ontare Road



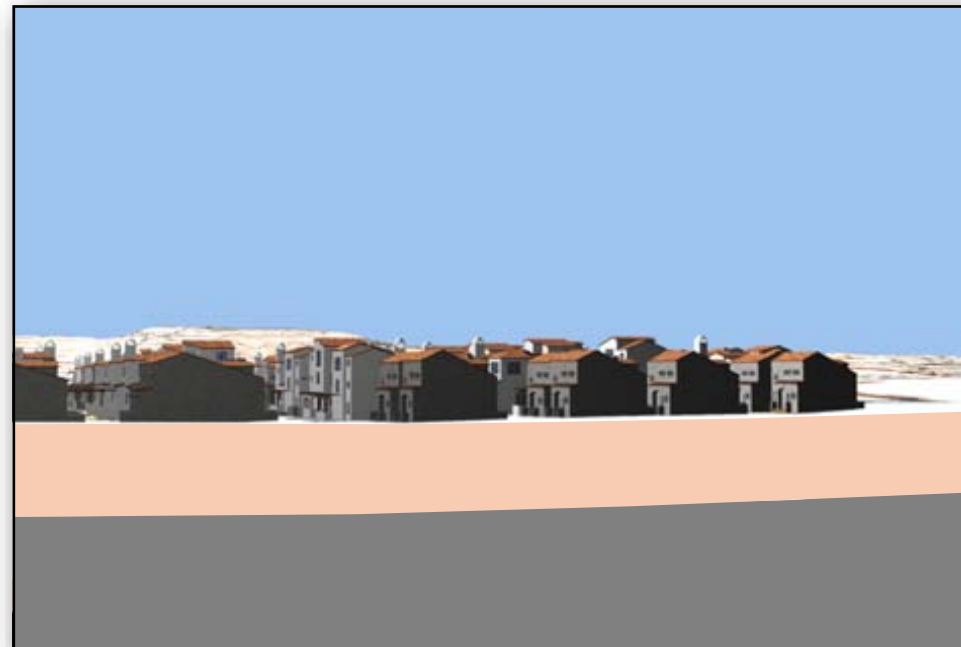
Location 5 - Existing
San Remo Drive at Grove Lane



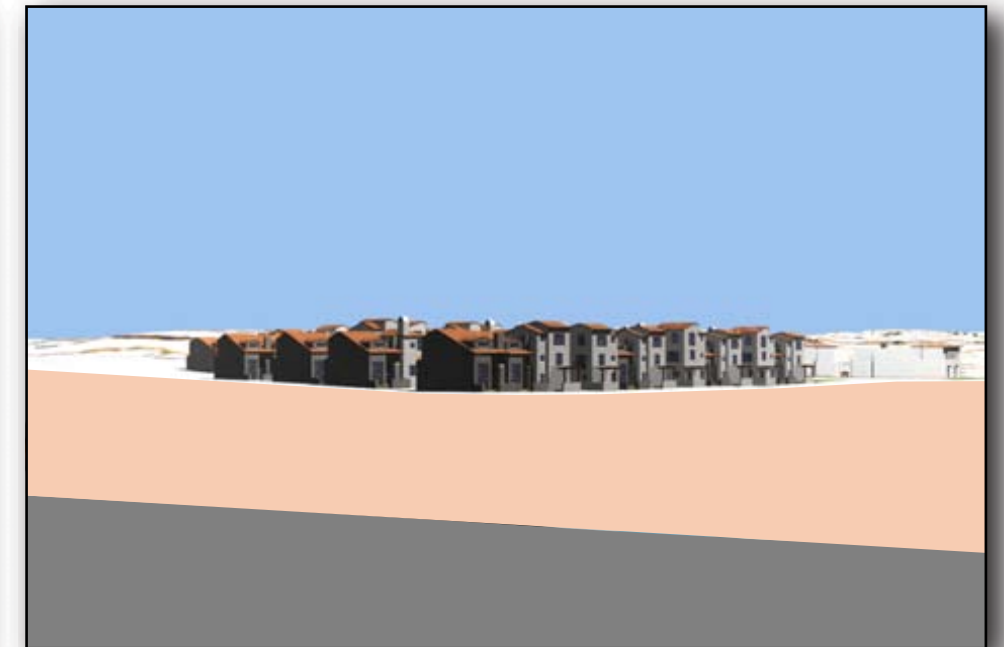
Location 6 - Existing
San Remo Drive at T&C Apartments



Location 4 - Applicant's Alternative



Location 5 - Applicant's Alternative



Location 6 - Applicant's Alternative

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-15



1012-001•01/09

Applicant's Alternate Massing Diagrams - Locations 4-6



SOURCE: Impact Sciences, Inc. – January 2009

FIGURE 8.0-16

Visual Simulation Photograph Locations



Existing



Without Trees



With Trees

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-17

Visual Simulations of Proposed Project - Location 1



Existing



Without Trees



With Trees

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-18

Visual Simulations of Proposed Project - Location 2



Existing



Without Trees



With Trees

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-19

Visual Simulations of Proposed Project - Location 3



Existing



Without Trees



With Trees

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-20

Visual Simulations of Applicant's Alternative - Location 1



Existing



Without Trees



With Trees

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-21

Visual Simulations of Applicant's Alternative - Location 2



Existing



Without Trees



With Trees

SOURCE: Impact Sciences, Inc. - January 2009

FIGURE 8.0-22

Visual Simulations of Applicant's Alternative - Location 3

9.0 ALTERNATIVES

9.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) describe a range of reasonable alternatives to the project, or its location, that could feasibly avoid or lessen any significant environmental impacts while substantially attaining the basic objectives of the project. An EIR should also evaluate the given alternatives' comparative merits. This section sets forth potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the *State CEQA Guidelines*¹ pertaining to the alternatives analysis are summarized below:

- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The No Project alternative shall be evaluated along with its impact. The no-project analysis shall discuss the existing conditions at the time the notice of preparation is published. Additionally, the analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason"; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are environmental impacts; site suitability; economic viability; availability of infrastructure; general plan consistency; regulatory limitations; jurisdictional boundaries;

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126.6.

and whether the applicant could reasonably acquire, control, or otherwise have access to the alternative site.²

9.2 ALTERNATIVES CONSIDERED

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible—and therefore merit in-depth consideration—and which are infeasible. The alternatives considered include a range of potential projects to meet the applicant’s objectives while eliminating or reducing significant environmental impacts identified in **Sections 6.0** through **8.0**.

Alternatives considered include the following:

- No Project/No Development,
- Alternative Site Design – Reconfigure Hotel (proposed project),
- Retain Front Setback Trees Alternative (applicant’s alternative), and
- Single Driveway Alternative– Single driveway access for either the proposed project or applicant’s alternative from State Street.

9.3 ALTERNATIVES ELIMINATED FROM FUTURE CONSIDERATION

Alternatives that are remote or speculative, or have effects that cannot be reasonably predicted, need not be considered.³ The following alternatives were considered by the City, but rejected as infeasible:

- Alternative Site – This alternative was not considered for further analysis because the City is primarily built out. Additionally, selection of an alternate site would require the applicant to secure a site; such an acquisition would be considered speculative and beyond what is considered reasonably feasible.
- Alternative Site Design – No Transfer Density – This specific alternative was not considered for further analysis because if the applicant were to merge the two parcels (rather than doing a lot line adjustment), the issue of density/development rights transfer would be irrelevant. The purpose of the alternatives analysis is to consider alternatives that are capable of avoiding or substantially lessening any significant effects of the project. Reducing the size/density of the project could potentially address visual impacts of the project. The Alternative Site Design – Reconfigure Hotel alternative addresses visual impacts of the project.

² California Code of Regulations, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126.6(f)(1).

³ *Ibid*, Section 15126.6(f)(3).

- Alternative Access – Use of Hitchcock Way as an access for the hotel – This alternative was not considered due to the fact that the owners of the project site do not have the ability to implement a single approach to the site using Hitchcock Way. Existing recorded documents indicate that the existing landowner of the Sandman property (3714-3740 State Street) has the right to use the common driveway and parking lot located on the west (Gwen Griffin property located at 3760 and 3768 State Street). However, disagreement exists between the applicant for the Sandman project and the owner of the lands to the west (Griffin) regarding the interpretation of the agreement to provide access beyond what exists currently. Additionally, it is the opinion of the applicant that the adjacent property owner (Griffin) will continue to assert its position that the existing easement does not permit any revisions to accommodate a proposal for access to the hotel. The applicant has indicated that it may require a court opinion and decision to resolve.⁴ Therefore, this alternative is considered speculative and not reasonably feasible.
- Remodel of Existing Use – the re-modeling of the existing Sandman Inn was not considered for further analysis because it would not make any substantive changes to the project site. A remodel would retain the existing uses including the motel, restaurant, and other commercial uses. Most significantly, it would not provide any residential use of the site and would be infeasible because it would not meet most of the project objectives.

9.4 SUMMARY OF ALTERNATIVES CONSIDERED

9.4.1 Alternative 1: No Project/No Build

The *State CEQA Guidelines* require that the EIR include evaluation of a no-project alternative along with its impact.⁵ The *State CEQA Guidelines* also state that

*the no project analysis shall discuss the existing conditions at the time the notice of preparation is published ... as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.*⁶

Under this alternative, the existing Sandman Inn would remain. There would be no redevelopment of the site. The existing commercial uses (restaurant and nail salon) would continue to operate. There would no change in the access to the Town & Country Apartments; the existing duplex on San Remo Drive would remain as is.

⁴ Letter from Greg Parker, Investec to Brent Daniels, L & P Consultants, June 16, 2004.

⁵ California Code of Regulations, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126.6(e)(1).

⁶ *Ibid*, Section 15126.6(e)(2).

9.4.2 Alternative 2: Alternative Site Design – Reconfigure Hotel (proposed project only)

This alternative would reconfigure the hotel portion of the proposed project such that the massing would be modified to shift the proposed third story portions of the project to the rear/interior portion of the proposed hotel parcel.

The hotel would be redesigned to move the mass away from State Street by removing the portion of the third floor above the front portion of the hotel (rooms room 301 to 314 [12 total rooms; note there are no rooms 311 or 312]) and constructing a two story building in the area of the proposed at-grade parking on the western side of the building.

The applicant is party to an existing easement agreement with the owners of the adjacent property to the west.⁷ These existing recorded documents show that the applicant has the right to use the common driveway and parking lot on the property to the west for ingress and egress for guests of the Sandman Inn hotel. In return, the easement provides the owners of the property to the west the right for ingress and egress for one motor vehicle described as “a single vehicle parking space” on the project site. Currently, a total of eight parking spaces that are accessed from the common driveway on the adjacent property are located on the project site. The applicant utilizes four of these spaces for the existing Sandman Inn. However, the applicant’s has indicated that these spaces were not included in the parking analysis for the proposed hotel under the proposed project as they did not provide for convenient access.⁸ Alternative 2 would result in the elimination of these eight spaces; however, the alternative could be slightly modified to accommodate one vehicle parking space for the neighboring property, if needed.

The revised design is shown on **Figure 9.0-1, Alternative Design Massing Diagram – Proposed Project**. This figure also shows the location of one-, two-, and three-story rooflines. The massing diagram view from Hitchcock Way and State Street corresponds to View Location 2 as seen on **Figure 8.0-12** for the proposed project.

⁷ Declaration of Easements, Covenants, Conditions and Restrictions by and among Corporate Plaza Partners, and Sandman Partners dated January 16, 1986 and amended May 5, 1986.

⁸ Personal correspondence from Greg Parker, Investec, to Joe Gibson, Impact Sciences, Inc., e-mail regarding Sandman Parking dated February 12, 2009.



View from Hitchcock Way and State Street

As Proposed

With Revised Rooflines



Legend:

Building Heights

- One-Story
- Two-Story
- Three-Story

Plan View of Building Heights of Proposed Project



NOT TO SCALE

SOURCE: Impact Sciences, Inc. - February 2009

FIGURE 9.0-1

Alternative Design Massing Diagram - Proposed Project

Depending upon design and space requirements, an additional building footprint in the location of the former at-grade parking spaces located on the western portion of the project site could be up to 38 feet by 118 feet resulting in an additional 4,484 gross square feet per floor (8,968 square feet for two floors). The existing design for the proposed project includes 10 guest rooms averaging 364 square feet each and two suites at approximately 600 square feet each for a total of 4,840 square feet on the third-floor portion of the building of the main hotel building that fronts State Street that would be eliminated as part of this alternative. Additionally, the existing design includes additional common area (hallways, stairwells, etc.) that would include up to an additional 1,500 square feet; therefore, the total existing third floor that would be relocated would be approximately 6,340 square feet. This area could be accommodated within the alternative redesign's 8,968 square feet.

No other changes (e.g., access) would be proposed under this redesign.

9.4.3 Alternative 3: Retain Front Setback Trees (applicant's alternative)

Under this alternative, mature trees located within the front setback area would be retained for the applicant's alternative. The applicant's alternative provides for additional front setback area along State Street for the residential condominium portion of the project. This alternative is not considered for the proposed project in that insufficient area is available in the front setback area due to the location of proposed residential condominiums along State Street and underground parking garages that extend to the front property line.

As noted previously, as currently proposed, both projects would require a permit for the removal of trees in the front yard setback. This permit request would include the removal of a major, 35-foot-tall jacaranda tree (*jacaranda mimosifolia* [tree no. 83 in the tree inventory]), and a 25- to 30-foot-tall mature blue atlas cedar tree (*Cedrus Atlantica 'Glauca'* [tree no. 85 in the project tree inventory]).⁹

The applicant's alternative would provide opportunity for the retention of the jacaranda and the blue atlas cedar in the front setback area that is proposed to be developed with a large turf landscaped area. Additionally, there is no underground parking structure proposed in this area. The retention of trees, particularly the jacaranda, may require some redesign of the shared office/residential driveway entrance from State Street to accommodate the tree's trunk and root system. However, there appears to be adequate space to accommodate the retention of these trees.

⁹ Charlie Eckberg, *Tree Study/Inventory, Sandman Inn 3714 State Street, Santa Barbara*, prepared for Investec, December 1, 2006.

Figure 9.0-2, Applicant's Alternative Visual Simulation (from Location 2) with Retained Trees, shows the applicant's alternative with the retained skyline trees (per required mitigation) and retained front yard setback trees (jacaranda and blue atlas cedar). These visual simulations correspond to **Figure 8.0-21** (applicant's alternative). It should be noted that a mitigation measure has been identified (see **Mitigation Measure VA-1** in **Section 8.7.4**) to relocate existing skyline trees, to the degree feasible, into the interior courtyard area of the proposed hotel for the proposed project or the office parking for the applicant's alternative, and/or the plaza/active open space area of the interior within the residential condominium portion.

9.4.4 Alternative 4: Single Driveway Alternative (proposed project and applicant's alternative)

An alternative site design being evaluated in the environmental analysis for either the proposed project or the applicant's alternative is a site plan that would have a single access driveway on State Street versus the two proposed driveways. Under this alternative, a single access driveway would provide access to both site uses (non-residential and residential) for either the proposed project or the applicant's alternative.

Under this alternative the current proposed access driveway for the residential condominiums in either scenario would be eliminated and access to the underground parking structure for the residential condominiums would be as follows:

- For the proposed project, the underground parking structure for the residential condominium portion would share the proposed ramp to the underground parking structure for the hotel portion. This would require a redesign of the parking spaces for the residential condominium parking structure to accommodate the new ingress/egress point. Under this alternative, there would also be security controls to prevent access to non-residents to the residential condominium portion of the parking structure.
- For the applicant's alternative, a new entrance to the residential condominium parking structure would be required to be installed within the interior of the office/residential condominium project area to allow for ingress/egress to the underground parking structure. The underground parking structure would be for use only by the residents of the condominiums; the proposed office buildings would continue to be served by a surface parking lot.



With Proposed Landscaping



With Retained Trees

SOURCE: Impact Sciences, Inc. – March 2009

FIGURE 9.0-2

Applicant's Alternative Visual Simulation (from Location 2) with Retained Trees

9.5 IMPACTS OF PROJECT ALTERNATIVES

9.5.1 Alternative 1: No Project/No Build

Impact Analysis

Air Quality

Under the No Project alternative, there would be no changes to uses on the project site that would result in any increase or decrease in emissions compared to existing conditions. The site would continue to function as a hotel with the related commercial (restaurant and nail salon) uses. There would be no impact to air quality.

Traffic/Transportation

Under this alternative, there would be no changes in traffic generated by the existing uses on the project site. The site would continue to function as a hotel with the related commercial (restaurant and nail salon) uses. The existing driveways to the site would continue to serve the site. Access to the Town & Country Apartments would continue via the hotel property and there would be no new access for the apartments to the north to San Remo Avenue. Under this alternative, the directions and strategies provided in the Upper State Street Study (USSS) would not be implemented and the site would continue to have multiple access points along State Street. There would be no impact to traffic/transportation.

Visual Aesthetics

Under the No Project alternative, the existing hotel and associated buildings would remain. The landscaping on the site, including the skyline lines, would remain. As such, existing views of the Santa Ynez Mountains from public viewing areas along State Street would remain. Under this alternative, there would be no impact to visual aesthetics.

Summary

The No Project alternative would not result in any new impacts. However, under this alternative, the directions and strategies outlined in the USSS would not be implemented.

The following objectives for the Sandman Inn Redevelopment Project would not be achieved:

- Provide an in-fill redevelopment project that is consistent with the City's existing general plan vision, specifically as it applies to the North State neighborhood, and taking into consideration direction given in the City's *General Plan Update: Policy Preferences Report* (December 2008);

- Provide increased housing opportunities, including affordable housing, which are located on the City's major transportation corridor and which are in close proximity to retail and service facilities;
- Incorporate the direction provided in the USSS as appropriate including project/site design, access and parking;
- Redevelop an existing underutilized commercial property with improvements which will maintain or enhance views of the mountains;
- Redevelop an existing underutilized commercial property to a mixed use project consisting of commercial and residential units; and
- Eliminate access conflicts between the Town & Country Apartments and the project parcels fronting State Street.

9.5.2 Alternative 2: Alternative Site Design – Reconfigure Hotel (proposed project)

Impact Analysis

Air Quality

Under the Site Design alternative, impacts to air quality would be similar to those for the proposed project. The site would still require the demolition of the existing hotel and associated buildings, an underground parking structure would be excavated and built, and the hotel and residential condominiums would be constructed. As the proposed hotel would remain essentially the same square footage, impacts resulting from emissions generated during construction would be the same as those for the proposed project.

Traffic/Transportation

Impacts to traffic and transportation would be the same under this alternative as estimated for the proposed project. Under this alternative, the number of rooms and other uses for the proposed hotel would remain the same and the proposed condominiums would remain as proposed under the proposed project; therefore, trip generation would be the same as estimated for the proposed project.

The parking spaces that are shared between the applicant's property and the property to the west would be eliminated. However, these parking spaces were not considered in the parking demand requirements for the hotel portion of the proposed project. The existing easement agreement¹⁰ does provide for one parking space to be used by the adjacent property in return for access across their site by Sandman Inn

¹⁰ Declaration of Easements, Covenants, Conditions and Restrictions by and among Corporate Plaza Partners, and Sandman Partners dated January 16, 1986 and amended May 5, 1986.

patrons to the other parking spaces located on the western side of the project site. The existing easement agreement would need to be revised/terminated should this alternative proceed and a determination made that the adjacent site did not require the use of the allocated space. As a result, there would be no impact resulting from the loss of these spaces.

Visual Aesthetics

Under this alternative, views from the Hitchcock Way–State Street intersection would afford more opportunity to view the Santa Ynez Mountains. By reducing the mass of the project along State Street and eliminating the third story on the front portion of the building, additional portions of the top of the Santa Ynez Mountains can be viewed from the intersection. However, the second story of the hotel portion of the proposed project still obstructs views of the lower portions of the mountains. The views of the mountains resulting from this design alternative for the hotel would be similar to those provided by the applicant's alternative.

Under this alternative, the landscape of the hotel portion of the site would be the same as for the proposed project. The existing vegetation would be removed, including the front setback trees and skyline trees; to the degree feasible, the skyline trees possibly could be retained. Impacts to the loss of trees and vegetation would be similar to those of the proposed project.

Summary

The Alternative Site Design – Reconfigure Hotel alternative would not result in any new impacts with regards to air quality and traffic/transportation. However, under this alternative, views of the Santa Ynez Mountains would improve over those of the proposed project and would be similar to those of the applicant's alternative.

The Alternative Site Design alternative would achieve the project objectives. However, implementation of this alternative would most likely require revision or termination of the existing access easement that exists with the adjacent property to the west. The ability of the applicant to terminate the easement may preclude a redesign that utilizes the area provided for shared parking between the two properties to accommodate the redesign suggested under this alternative; and this alternative may be therefore infeasible.

9.5.3 Alternative 3: Retain Front Setback Trees Alternative (applicant's alternative)

Impact Analysis

Air Quality

Under the Retain Front Setback Trees alternative, impacts to air quality would be similar to those for the applicant's alternative. The site would still require the demolition of the existing hotel and associated buildings, an underground parking structure would be excavated and built, and the office buildings, and residential condominiums would be constructed. As the proposed office buildings would remain the same square footage, impacts resulting from emissions generated during construction would be the same as those for the applicant's alternative.

Traffic/Transportation

Impacts to traffic and transportation would be the same under this alternative as estimated for the applicant's alternative. Under this alternative, the proposed office buildings and condominiums would remain as proposed under the applicant's alternative; therefore, trip generation would be the same as estimated.

To accommodate the retention of the mature jacaranda, blue atlas star trees and other mature trees located within the front setback area of the residential condominium open space area, some redesign of the entrance driveway between the office buildings and residential condominiums may be required; however, there would be no change in the number of driveways from State Street to the project site.

Visual Aesthetics

The trees in the front setback of the residential condominium portion of the applicant's alternative (the major jacaranda and blue atlas cedar) would be retained; this would reduce the number of trees subject to the Tree Removal Permit. The ability to retain these trees is based on the front setback shown on the site plan for the applicant's alternative (see **Figure 3.0-12**), which includes a landscaped area along State Street in front of the residential condominiums. Additionally, the plan for the underground parking structure does not show any proposed structure in this area. The retention of trees, particularly the jacaranda, may require some redesign of the shared office/residential driveway entrance from State Street to accommodate the tree's trunk and root system. However, there appears to be adequate space to accommodate the retention of these trees.

Under this alternative, the views of the skyline from along State Street also would include the skyline trees (Mexican Fan palms) as provided by the required mitigation (see **Mitigation Measure VA-1 in Section 8.7.4**). As such, the existing skyline view would be retained and would provide for a continuation of the skylines along State Street.

Under this alternative, the retention of these front setback trees would continue obstruct views of the Santa Ynez Mountains from along State Street the same as they do at present. This means that the view corridor created by the project would not be opened up. However, the number of trees to be removed from the front setback area would be reduced thereby providing more consistency with the ABR's landscape guidelines. This alternative would result in achieving more consistency with the policies and implementation strategies of the Conservation Element of the general plan, specifically:

- 4.0 Trees enhance the general appearance of the City's landscape and should be preserved and protected; and
- 4.1 Mature trees should be integrated into project design rather than removed. The Tree Ordinance should be reviewed to ensure adequate provision for review of protection measures proposed for the preservation of trees in the project design.

Visual aesthetic impacts related to tree loss under this alternative would be less than those for either the proposed project or the applicant's alternative.

Summary

The Retain Front Setback Trees alternative would not result in any new impacts with regards to air quality and traffic/transportation. However, under this alternative, views of the Santa Ynez Mountains would not be opened as proposed under the applicant's alternative because mature vegetation would not be removed. Views would be similar to those that exist currently. While this alternative would meet the project objectives and is more consistent with certain City policies related to trees, it also reduces the project's ability to open up scenic views to the mountains. Therefore, decision-makers would need to weigh the merits of this alternative as it relates to both view policies and tree preservation policies.

9.5.4 Alternative 4: Single Driveway Alternative (proposed project and applicant's alternative)

Impact Analysis

Air Quality

Under the Single Driveway alternative, impacts to air quality would be similar to those for the proposed project or applicant's alternative, respectively. The site would still require the demolition of the existing hotel and associated buildings, an underground parking structure would be excavated and built, and the hotel or office and residential condominiums would be constructed. As the proposed development (hotel or office and condominiums) would remain essentially the same square footage (respectively), impacts resulting from emissions generated during construction would be the same as those for the proposed project or applicant's alternative, respectively.

Traffic/Transportation

Under this alternative, the number of access points to the project site would be reduced from two to one for both the proposed project and applicant's alternative. With this alternative the results and conclusions of the intersection analyses would be the same as those for the proposed project and applicant's alternative presented in **Section 7.7.1**. As the proposed development would remain the same, there would be no changes in trips forecast from either proposal. A reduction of the number of driveways along State Street would lend itself to making the pedestrian experience more friendly and reducing potential conflicts between pedestrian and vehicular traffic entering and exiting the project site.

Since the volume and assignment of project-related traffic would be the same as the previous alternatives, the Single Driveway alternative would have no significant project-related or cumulative impacts at the analyzed intersections.

As previously discussed, reducing the number of driveways on State Street and increasing the spacing between the remaining driveways will improve traffic flow, reduce potential conflict between vehicle, bicycles, and pedestrians, and make the corridor a more bicycle- and pedestrian-friendly environment. To reduce the project access to a single location, several site design issues would need to be addressed. These include the following:

- The site access driveway must provide adequate stacking space for outbound vehicles. This would eliminate some at-grade parking that is currently proposed along the outbound side of the access drive. Parking spaces located too close to the intersection could impede outbound traffic flow.

- The inbound side of the driveway must allow for unobstructed movement into the site to minimize possible backing up of vehicles onto State Street. This would eliminate some parking along the inbound side of the driveway (for 100 feet back of the curblin) and access to any parking lots or side driveways should be beyond any queues from vehicles exiting the site.
- With all site traffic accessing at a single location, the driveway must be located far enough east of the Hitchcock Way intersection to allow exiting cars to not be blocked from exiting the site by westbound queues on State Street. The proposed commercial driveway location would be adequate for this access; however, any additional space that could be provided between the driveway and the State Street and Hitchcock Way intersection would improve overall traffic operations.
- Adequate way finding within the site and visibility at driver decision points should be provided to reduce the possibility of unfamiliar drivers making wrong turns.

Additionally, this alternative would provide for the implementation of the following guidelines for vehicle access management provided in the USSS:¹¹

- Encourage joint and cross access, and consolidate access whenever separate parcels are assembled under one purpose, plan, entity or use, to increase average spacing between adjacent driveways;
- Attempt to achieve uniform spacing of driveways along the street as much as possible;
- Minimum driveway spacing of 440 feet apart for new redevelopment is desired if feasible given existing development patterns. Where necessary based on special land use patterns and access requirements that cannot otherwise be met, a minimum driveway spacing distance of 220 feet may be considered; and
- Limit all new access to one driveway per property, except where properties exceed 300 feet in frontage, in which case allow two driveways as needed based on site design.

Reducing the number of site driveways from four to two as proposed for the proposed project and applicant's alternative is consistent with the USSS guidelines for reducing the number of driveways along State Street to help improve traffic flow by reducing friction and potential conflicts. However, providing a single access driveway, versus the proposed segregated residential and non-residential driveways, would better address this USSS guideline as it would also address the guideline for providing shared driveway access. A single driveway would also allow for easier circulation between parking areas and encourage the shared use of parking by visitors. This would be especially beneficial for the applicant's alternative with office and residential uses as more office parking spaces would be available for evening and weekend parking versus the hotel parking.

Optimally, the spacing between a single driveway and the Hitchcock Way intersection should be more than the minimal 110 feet listed in the USSS guidelines (see Table 3 of the USSS guidelines). However, that spacing would be acceptable if a longer spacing could not be provided. A more desirable location

¹¹ City of Santa Barbara, *Upper State Street Study Report*, March 2007, Table 2 and Table 3.

would be at least 300 feet east of Hitchcock Way. This is so that vehicles exiting the site and wanting to access the westbound left-turn lane at Hitchcock would be entering State Street beyond the start of the turn lane. However, as noted above, the proposed commercial driveway is about 210 feet from the Hitchcock Way intersection and would be acceptable.

Further, this alternative would provide for reducing the number and frequency of driveways along State Street (as called out in the USSS), thereby reducing the “friction” of starting, stopping, and slowing by vehicles, reducing potential conflicts, and improving mid-block through traffic flow.¹² Further, Policy 5.4.4 of the Circulation Element of the City’s general plan currently states that driveways should be minimized in width and number.¹³

Implementation of this alternative would require a new access point to the underground parking structure for the residential condominiums. Under the proposed project, a shared access point with the hotel could be provided; under the applicant’s alternative, a new ramp to the condominium parking structure would be required from the shared driveway. Depending upon these redesigns and locations of the ramps, parking spaces in the residential condominium parking structure may require reconfiguration.

Based on the size of the property and the plans submitted for either the proposed project or the applicant’s alternative, the development of a Single Driveway alternative should be feasible with adequate parking provided to meet City code requirements.

Visual Aesthetics

Under this alternative, there would be very little change to the visual aesthetics. The proposed driveway and ramp to the residential parking structure on the eastern portion of the property would be eliminated and likely replaced with landscaping.

Summary

The Single Driveway alternative would not result in any new impacts with regards to air quality or visual analysis. Additionally, as neither the proposed project nor applicant’s alternative results in significant impacts to either traffic/circulation or parking, there would be no change in levels of service or parking demand. However, this alternative would provide for more consistency with the policies of the USSS and Circulation Element in that it would reduce the number of driveways and provide for increased spacing of driveways along State Street. This should improve traffic flow and pedestrian safety by reducing “friction.” The Single Driveway alternative would meet the project objectives.

¹² City of Santa Barbara, *Upper State Street Study Report*, March 2007, 4-7

¹³ City of Santa Barbara, *General Plan*, “Circulation Element,” adopted November 1997, 5-5

9.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 9.0-1, Summary Comparison of All Alternatives, provides a comparative analysis of the environmental impacts of the project and alternatives. These alternatives were identified to avoid or minimize the significant or adverse impacts identified for the project.

Per the *State CEQA Guidelines*, the purpose of evaluating alternatives to the project is to determine whether any different project designs or locations could feasibly attain most of the basic project objectives while eliminating or reducing adverse environmental impacts.¹⁴

As previously noted, neither the proposed project nor the applicant's alternative have any significant impacts that can not be mitigated. The alternatives presented herein either reduce already less than significant adverse impacts, or present options to make the project more consistent with the City policies outlined in the General Plan and the Upper State Street Study guidelines.

The Alternative Site Design, Retain Front Setback Trees, and Single Driveway Alternatives address three different less than significant environmental and policy concerns related to scenic mountain views, loss of onsite trees, and circulation. All three of these designs would be more consistent with City policy than the proposed project (hotel and residential development).

Both the Alternative Site Design Alternative (hotel and residential complex) and applicant's alternative (office and residential complex) would block scenic views of the mountains as seen from intersection of Hitchcock and State Street less than the proposed project (hotel and residential complex). The Alternative Site Design for the hotel and applicant's alternative would have very similar impacts with relation to blockage of scenic views.

Both the Retain Front Setback Trees and Single Driveway Alternatives, if added into the applicant's alternative, would make that alternative more consistent with City policy and result in a reduction of less than significant environmental impacts. It should be noted, however, that while the Retain Front Setback Trees Alternative would further reduce less than significant impacts related to the loss of trees, retaining skyline trees onsite would reduce the project's ability to open up scenic views of the mountains. Therefore, decision-makers would need to weigh the merits of this alternative as it relates to both view policies and tree preservation policies.

As previously stated, none of the alternatives or projects presented would result in any significant environmental impacts.

¹⁴ California Code of Regulations, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126.6.

**Table 9.0-1
Comparison of Alternatives**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	Applicant's Alternative Impact (After Mitigation)	Alternative 1: No Project		Alternative 2: Alternative Site Design		Alternative 3: Retain Major Trees		Alternative 4: Alternative Access	
			Compared to Proposed Project	Compared to Applicant's Alternative	Compared to Proposed Project	Compared to Applicant's Alternative	Compared to Proposed Project	Compared to Applicant's Alternative	Compared to Proposed Project	Compared to Applicant's Alternative
			Air Quality	Less than significant	Less than significant	Less Impact	Less Impact	Similar Impact	Similar Impact	Similar Impact
Transportation/Circulation	Less than significant	Less than significant	Less Impact	Less Impact	Similar Impact	Similar Impact	Similar Impact	Similar Impact	Similar Impact	Similar Impact
Visual Aesthetics	Less than Significant	Less than significant	Less Impact	Less Impact	Less Impact	Similar Impact	Less Impact	Less Impact	Similar Impact	Similar Impact

10.0 LONG-TERM IMPLICATIONS OF THE PROJECT

10.1 INTRODUCTION

This section presents the evaluation of other types of environmental impacts required by the California Environmental Quality Act (CEQA) that are not covered within the other sections of this environmental impact report (EIR). The other CEQA considerations include unavoidable adverse impact and long-term implications of the project.

10.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD BE INVOLVED IN THE PROJECT SHOULD IT BE IMPLEMENTED

According to the *State CEQA Guidelines*, “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.”¹ Primary impacts and, particularly, secondary impacts (such as highway improvement that provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that cannot be avoided.

Both construction and operation of the project would necessarily lead to the consumption of limited, slowly renewable, and nonrenewable resources, committing such resources to uses that future generations would be unable to reverse. The new development would require the commitment of resources that include (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project site.

Construction of either the proposed project or the applicant’s alternative would consume limited amounts of certain types of lumber; other raw materials such as steel, metals such as copper and lead; aggregate materials used in concrete and asphalt such as sand and stone; water; petrochemical construction materials such as plastic; petroleum-based construction materials; and other similar slowly renewable or nonrenewable resources. Additionally, fossil fuels for construction vehicles and equipment would be consumed.

¹ California Code of Regulations, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126.6 (c).

In terms of project operations, the following slowly renewable and nonrenewable resources would be required: natural gas and electricity, petroleum-based fuels, fossil fuels, and water. The California Administrative Code (Title 24) regulates the amount of energy consumed by new development for heating, cooling, ventilation, and lighting purposes. Nevertheless, the consumption of such resources for operation of the development would represent a long-term commitment of those resources.²

The commitment of resources required for the construction and operation of either project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth and planned changes on the project site and within the general vicinity.

Along with the long-term commitment of land uses is an increased commitment of certain public services to the proposed land uses. This includes the provision of police and emergency medical services, water supply services, wastewater treatment services, and solid waste disposal. However, as indicated in the Initial Study and **Section 11.0** of this EIR, impacts associated with these public services would be less than significant.

Both the proposed project's and applicant's alternative's contribution to state, national, and global greenhouse gases (GHG) emission inventories and the resultant effect on global climate change were evaluated on a cumulative basis.

The fact that the both proposed project and the applicant's alternative would result in emissions of GHGs (chiefly carbon dioxide) and that global GHGs emissions contribute to the greenhouse effect, the resultant impacts on global climate change do not imply that the proposed project would have a cumulatively considerable impact on global climate change. Furthermore, to date no criteria have been established to assess the cumulative impact of a single project on global climate change. Moreover, consistency with the implementing programs and regulations to achieve the statewide GHG emission reduction goals established under Executive Order S-3-05 and Assembly Bill (AB) 32 cannot be evaluated because they are still under development. Nonetheless, the Climate Action Team, established by Executive Order S-3-05, has recommended strategies that could be implemented at the statewide level to meet the goals of the executive order. In the absence of an adopted plan or program by which to assess the proposed project's cumulative impacts through its consistency with such plans or programs, the Climate Action Team's strategies serve as the current statewide approaches to reducing the state's GHG emissions.

In its report to the governor and the legislature, the Climate Action Team recommended strategies that could be implemented by various state boards, departments, commissions, and other agencies to reduce

² California Code of Regulations, Title 24, Part 6, California Energy Code.

GHG emissions.³ The project contains several design features such as considerations for the use of solar panels, increased access to natural lighting and adherence to the City's energy ordinance that would result in lower fuel combustion emissions, reduced energy usage, water conservation, and other collateral benefits with respect to GHG emissions.⁴ In addition to these project design features, the applicant has made a commitment to implement several corporate initiatives to reduce GHG emissions.

10.3 GROWTH INDUCING IMPACTS OF THE PROJECT

The *State CEQA Guidelines* require that an EIR discuss ways in which a proposed project could directly or indirectly foster economic or population growth or the construction of additional housing.⁵ Direct growth-inducing impacts are generally associated with aspects of a project that could remove obstacles to population or other growth, such as a major expansion of a wastewater treatment plant or upgrading of regional master plan infrastructure and facilities that would allow more construction in a service area. The extension of new services and facilities because of one project can eliminate constraints to other development by creating additional capacity in utilities and/or facilities, which can then serve additional development.

In general terms, a project may foster growth in a geographic area if it meets any of the criteria identified below:

- The project removes an impediment to growth, such as through the establishment of an essential public service, or the provision of new access to an area that will facilitate additional growth.
- The project results in the urbanization of land in a remote location that will induce the growth of undeveloped areas between the project and existing developed areas, commonly referred to as "leap-frog development."
- Economic expansion or growth occurs in an area in response to the project, such as by means of a substantial change in revenue base or an expansion of employment.
- The project establishes a precedent-setting action, such as approval of a general plan amendment or change in zoning that will serve as a precedent for other similar projects.

Should a project meet any one of these criteria, it may be considered growth inducing. An evaluation of the proposed Sandman Inn Redevelopment Project in relation to these criteria is provided in this section.

³ California Environmental Protection Agency, Climate Action Team, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006.

⁴ Mitigation measures that are intended to reduce criteria pollutant emissions associated with fuel combustion (e.g., truck emissions) or energy conservation would allow serve to reduce GHG emissions.

⁵ California Public Resources Code, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Section 15126(d).

10.3.1 Removal of an Impediment to Growth

Growth in an area may result from the removal of physical impediments or restrictions to growth. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack or insufficiency of essential public services, such as sewer and water service.

The project site is currently served by water, sewer, electricity, and natural gas infrastructure, and the construction of new infrastructure is not required to support development of the uses that would be required by the proposed project or applicant's alternative. Additionally, complete access to the site (transportation infrastructure) is currently provided. Therefore, no growth-inducing impacts are expected with regard to this type of infrastructure.

10.3.2 Urbanization of Land in Remote Locations (Leap-Frog Development)

Development can be considered growth inducing when it is not contiguous to existing urban development and "leaps" over open space areas. The project site is located within the City and the North State neighborhood, and located immediately south of existing residential development in the City (San Roque neighborhood). While the project would extend this existing pattern of development, it will not leap over undeveloped areas and introduce development that is not contiguous with existing development. As the project site is adjacent to development on all sides, the redevelopment of the site under either the proposed project or the applicant's alternative is consistent with the existing urban development pattern in the City and the North State and San Roque neighborhoods, and will not result in additional growth.

10.3.3 Economic Growth

The proposed project provides for a new hotel and 73 residential condominiums; the applicant's alternative provides for 14,600 square feet of office use and, 73 residential condominiums. The project area is located in the North State neighborhood, which presently is served by existing retail-commercial uses and other support services and facilities, including public transit. Given the relation of the project site to the existing development pattern in the surrounding area, it is not anticipated that the project will foster or promote additional growth of commercial uses in the area, but rather will support existing resources of this nature. Given the size of the residential portion of the proposed project or the applicant's alternative (73 residential units each), and the relatively small resulting increase in population, it is expected that new residents seeking commercial uses in the City could be absorbed by the existing commercial opportunities in the City.

The future residents of the ~~single-family~~ residential condominiums (of either the proposed project or applicant's alternative) that would be developed would also represent an incremental increase in the local labor force. Given the size of the proposed project and the applicant's alternative, and the relatively small resulting increase in population, it is expected that new residents seeking employment within the City would be absorbed by existing employment opportunities in the City and nearby communities. The growth in population associated with the project is consistent with the adopted growth projections for the City. Therefore, it is not anticipated that either the proposed project or applicant's alternative alone would induce growth in commercial, industrial, or office development on presently undeveloped property in the City.

10.3.4 Precedent-Setting Action

The project site is located on the north side of State Street in an area identified as the Upper State Street corridor. As identified in the *Upper State Street Study (USSS) Information Booklet*, the site is located within the west subarea of the Upper State Street area.

The Upper State Street area of the City is primarily in residential use (44 percent) under the *City of Santa Barbara General Plan*. Zoning in the Upper State Street area provides for low-density residential use with commercial, office, and hotel uses indicated for much of the State Street frontage and La Cumbre-State Street area.

As shown on **Figure 3.0-5**, a variety of uses lie adjacent to the project site, including:

- North: apartment buildings and condominiums;
- South: State Street and commercial uses (restaurants, car wash, bank, retail, etc.);
- East: office buildings; and
- West: banks and office buildings.

The main project site and immediate areas to the east and west are part of the North State neighborhood. This neighborhood is an intensively developed commercial strip containing a scattering of multiple-family residential development; mobile home parks are also located on the periphery.

Development of the site with the proposed uses (either hotel and residential or office and residential) is, therefore, consistent with existing land use plans and policies and is not precedent setting. For an extensive discussion of land use approvals being sought by the applicant and the land use compatibility of the project with the relevant planning and land use regulations, please refer to **Section 5.0, Land Use and Policy Consistency**, of this draft EIR.

10.3.5 Conclusion

The proposed project will not induce additional growth in the surrounding area.

10.4 ENERGY CONSERVATION

This section of the EIR provides a discussion and analysis of the proposed project's and applicant's alternative's

- potential energy impacts with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy using procedures described in the *State CEQA Guidelines*, Appendix F;
- consistency with the City of Santa Barbara Energy Ordinance;
- sustainability/smart growth benefits using tools such as Built Green Santa Barbara's checklist rating system and smart growth indicators.

10.4.1 Regulatory Framework

State

California's Energy Commission

The California Legislature established the Energy Commission and its basic mandates in 1975.⁶ The Energy Commission is required to adopt, implement, and periodically update energy efficiency standards for both residential and nonresidential buildings.

California Energy Code

The California Energy Code (Title 24) provides energy building regulations for all occupiable residential and non-residential buildings.⁷ The regulations are set forth in the Building Energy Efficiency Standards, which are currently being updated for adoption in 2008 and implementation in 2009.⁸

California Global Warming Solutions Act of 2006

Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006, mandates that California reduce its GHG emissions to 1990 levels by 2020.⁹ AB 32 marks a significant change in California's energy

⁶ California Public Resources Code, Sections 25402 and 25402.1.

⁷ California Code of Regulations, Title 24, Part 6, California Energy Code.

⁸ California Energy Commission, Commission Proposed Standards, *2008 Building Energy Efficiency Standards for Residential and Nonresidential Buildings*, November 2007.

policies. Before its passage, energy policy makers focused on stabilizing and/or minimizing energy costs, ensuring supply, limiting dependence on imports and fossil fuels, protecting the environment, and benefiting the state's economy. AB 32 obligates the state to meet its previous energy goals, but it must do so while reducing the volume of CO₂ emissions. Slowing global warming requires meeting energy needs with zero- or low-carbon energy sources.

California Energy Action Plan

The California Energy Action Plan is developed jointly by the California Public Utilities Commission and the California Energy Commission with active participation from other state agencies with energy-related responsibilities.¹⁰ The Energy Action Plan establishes energy efficiency as the resource of first choice for meeting California's energy needs (i.e., energy efficiency is at the "top of the loading order"). On September 21, 2005, the commissions adopted Energy Action Plan II. Among other directives, Energy Action Plan II directs the Energy Commission to adopt new building standards for implementation in 2008 that include new energy-efficiency measures, cost-effective demand-response technologies (such as programmable communicating thermostats), and the integration of photovoltaic systems.

California Environmental Quality Act

The *State CEQA Guidelines* include Appendix F, which provides for consideration of energy implications of proposed projects.¹¹ It requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

Local

City of Santa Barbara Energy Ordinance

The City of Santa Barbara established local energy-efficiency standards in February 2008.¹² The standards took effect in March 2008 and require that new building meet certain energy-efficiency standards.

⁹ California Energy Code, Chapter 488, California Global Warming Solutions Act of 2006 (AB 32).

¹⁰ California Energy Commission, Notice of Proposed Action, *2008 Building Energy Efficiency Standards*, November 16, 2007, 6.

¹¹ California Public Resources Code, Title 14, Division 6, Chapter 3, *California Environmental Quality Act Guidelines*, Appendix F.

¹² City of Santa Barbara, Municipal Code, Title 22, Chapter 22.82, Local Energy Efficiency Standards, adopted February 5, 2008.

In addition to requiring that the California Title 24 standards be installed, the ordinance requires that specific additional measures, as applicable, be installed.¹³

The ordinance also provides requirements for low-rise (three stories or fewer) and high-rise residential building.

For hotels and non-residential buildings, as proposed under the proposed project and applicant's alternative, the ordinance requires that all new construction meet the general compliance using a perspective- or performance-based approach.

Municipal Code

The Santa Barbara Municipal Code provides for protection and enhancement of solar access.¹⁴ The code establishes height limitations for the maximum elevation of certain structures to protect and enhance solar access.

10.4.2 CEQA Appendix F Considerations

Energy Setting

Regional Service

Electricity

Electrical energy to the City of Santa Barbara is provided by Southern California Edison (SCE). SCE is the largest electric utility in California, serving more than 13 million people in a 50,000-square-mile area of central, coastal, and Southern California, excluding the City of Los Angeles and certain other cities.¹⁵ Based in Rosemead, California, the utility has been providing electric service in the region for more than 120 years. SCE's service territory includes more than 180 cities. SCE uses more kinds of energy to produce electricity than any other utility in the world. These resources include natural gas, a fossil fuel; falling water in hydroelectric plants; nuclear energy; and renewable resources, like solar and wind.¹⁶

¹³ Energy Star is a joint program of the US Environmental Protection Agency and the US Department of Energy to reduce energy costs and protect the environment through energy efficient products and practices.

¹⁴ City of Santa Barbara, Municipal Code, Chapter 28.11, Protection and Enhancement of Solar Access.

¹⁵ Edison International, "Southern California Edison," <http://www.edison.com/ourcompany/sce>.

¹⁶ Southern California Edison, "Power generation," <http://www.sce.com/PowerandEnvironment/PowerGeneration/PowerProduction/>.

Edison International and its subsidiaries, Southern California Edison and Edison Mission Group, have reduced emissions through the development of clean generation technologies and investments in energy efficiency.¹⁷

Annually, California uses 272,000 million kilowatt-hours (kWh) of electricity and is ranked second in electricity consumption behind Texas (334,258 million kWh).¹⁸ In 2005, the US used approximately 3,661,000 millions kWh. California was ranked fiftieth out of the 50 states with the lowest per capita use (7,032 kWh per capita in 2005); the national average was 12,347 kWh in 2005. Electric energy consumption in California has continued to increase from 1980 to 2005 from 167,935 million kWh to 272,385 million kWh as shown in **Table 10.0-1, California Electrical Consumption by Sector 1980 to 2005**.

The California Energy Commission's projection for electrical consumption for 2006 was 297,733 million kWh and 302,399 million kWh for 2007.¹⁹ The California Energy Commission's estimated electrical consumption is anticipated to grow to 320,178 million kWh in 2018.²⁰

The project site is located in SCE service area 16.²¹

Natural Gas

SoCalGas, a subsidiary of Sempra Energy, is the nation's largest natural gas distribution utility, serving more than 20 million customers across 20,000 square miles throughout most of central and southern California including the counties of Fresno, Imperial, Kern, Kings, Los Angeles, Orange, Riverside, Santa Barbara, San Bernardino, San Luis Obispo, Tulare, and Ventura.²²

17 Edison International, Greenhouse Gas Initiatives, "Edison International actions to address the risks of potential global warming," http://www.edison.com/community/eme_ghg.asp.

18 California Energy Commission, *U.S. Per Capita Electricity Use by State in 2005*, May 9, 2007, http://www.energy.ca.gov/electricity/us_per_capita_electricity_2005.html.

19 Ibid, *1998 Baseline Energy Outlook*, CEC Staff Report, Appendix A: Electric Consumption Data

20 Ibid, *California Energy Demand 2008-2018 Staff Revised Forecast, Staff Final Report*, CEC-200-2007-015-SF2, November 2007.

21 California Public Utilities Commission, *Southern California Edison Service Territory Map*, <http://www.cpuc.ca.gov/maps/SCEServiceTerritoryMap>

22 Sempra Energy, The Sempra Utilities, <http://www.sempra.com/companies/utilities.htm#scg>.

Table 10.0-1
California Electrical Consumption by Sector 1980 to 2005
(million kWh)

Year	Residential	Commercial	Industrial	Mining	Agriculture	Transportation, Communication & Utility	Street Lighting	Total Consumption
1980	52,082	47,600	40,771	4,104	13,737	7,956	1,685	167,935
1985	58,528	56,908	41,496	7,329	17,453	10,423	1,537	193,673
1990	67,667	72,753	47,384	6,786	20,774	12,430	1,580	229,375
1995	69,770	78,409	46,834	6,148	14,301	13,238	1,624	230,323
2000	80,612	95,148	49,801	5,713	17,532	14,486	1,730	265,021
2005	84,527	101,393	44,586	6,559	19,502	14,014	1,804	272,385

Source: California Energy Commission, September 11, 2006.

The utility distributes 1 trillion cubic feet of natural gas annually to 5.7 million residential, commercial, and industrial customers throughout the southern half of California.²³ SoCalGas owns and operates 100,400 miles of gas distribution mains and service lines, as well as about 2,900 miles of transmission and storage pipeline. The utility also owns gas transmission compressor stations and underground storage facilities.

Local Service and Use

The project site is located in an urban area where all public services are available. In 2005, the City prepared a *General Plan Update: 2030 Conditions, Trends, and Issues (CTI) Report*, which examined existing conditions associated with electrical power and natural gas.²⁴ The *CTI Report* specifically analyzed whether there were deficiencies, existing or anticipated, for each of the public services. The *CTI Report* determined that electricity and natural gas services are being provided at acceptable service levels and utility companies did not identify any deficiencies in providing service in the future.

²³ Hoover's, Southern California Gas Company, Company Description, http://www.hoovers.com/socalgas/--ID__109117--/free-co-profile.xhtml.

²⁴ City of Santa Barbara, *General Plan Update: 2030 Conditions, Trends, and Issues*, September 2005.

Project Energy Requirements

Construction

During construction, both mobile and stationary equipment will require energy supplies. Construction equipment, vehicles transporting construction workers, and on-site facilities will require gas and diesel fuels and electrical energy. The amount of energy to be consumed during construction will be limited to the construction period of up to 124 weeks for the proposed project and 104 weeks for the applicant's alternative, as shown in **Figure 3.0-16**, and would be supplied to the site by existing infrastructure. A variety of equipment for the different phases of construction would be used (see **Table 3.0-3**).

Operation

Once built the proposed project would include a 106-room hotel with 73 residential condominium units; the applicant's alternative would include an office building of approximately 14,254 square feet and 73 residential condominium units.

Both projects would result in employees of either the hotel or offices being located on site. The following employment projections are assumed:

- 1 employee per hotel room
- 1 employee per 300 square feet of commercial office space

Based on these factors, the proposed project's hotel would result in approximately 106 employees and the applicant's alternative would result in approximately 49 employees. The hotel would operate 24 hours a day and 7 days a week with reduced staffing and energy use in the evenings and nighttime; the commercial offices would operate during business hours (8:00 AM to 5:00 PM) Monday through Friday. Energy use for both projects would not increase beyond the current use of the existing Sandman Inn and would be subject to the City's energy ordinance, compliance with which would result in increased energy efficiency.

Photovoltaic (Solar Access) Considerations

The proposed project was evaluated for consideration off access for the use of photovoltaic (solar) panels.

Shade and Shadow Analysis

Shade and shadow simulations were prepared for the proposed project and the applicant's alternative to assist in evaluating whether areas of either project are suited for photovoltaic systems. Shade and shadow simulations do not include vegetation or streetscape.

The process for developing the simulations included the following:

1. Proposed structures supplied by the applicant's architect.
2. Structures were placed on a Globe Explorer aerial photograph base that included the immediate surrounding area.
3. Simulations of the summer and winter solstices, June 21 and December 21, respectively, were prepared for the following periods in response to the threshold used by the City to determine the significance of shading impacts:
 - Summer Solstice: June 21 9:00 AM to 5:00 PM
 - Winter Solstice: December 21 9:00 AM to 3:00 PM

These periods were selected because they represent the portion of the day during which maximum seasonal shading would occur during the winter and summer periods

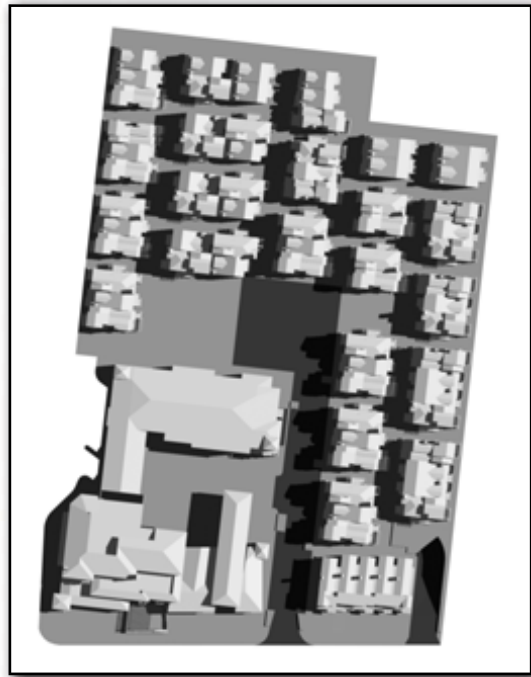
Shade and Shadow Evaluation

The potential shade and shadow impacts of the proposed project and applicant's alternatives were analyzed by preparing a computer model of the proposed structures for each and simulating the shadows that would be created by the structures. The models were based on the conceptual site plans presented in **Section 3.0, Project Description**, and reflect the height of the proposed hotel and residential condominium structures for the proposed project and of the proposed office and residential condominiums for the applicant's alternative.

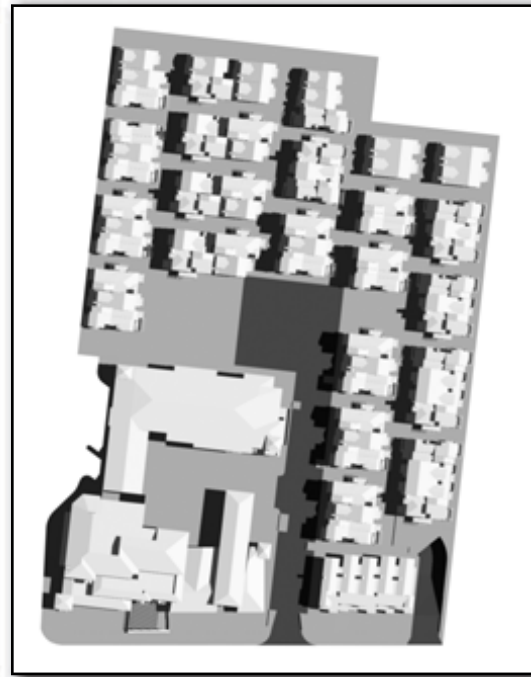
Figure 10.0-1, Shade & Shadow Analysis: Proposed Project – June 21 Conditions, presents graphic analysis of shade and shadow patterns cast by the proposed project at 9:00 AM, 10:00 AM, 11:00 AM, 12:00 PM, 3:00 PM, 4:00 PM, and 5:00 PM during the summer solstice. **Figure 10.0-2, Shade & Shadow Analysis: Proposed Project – December 21 Conditions**, presents graphic analysis of shade and shadow patterns cast by the proposed project at 9:00 AM, 10:00 AM, 11:00 AM, 12:00 PM, 1:00 PM, 2:00 PM, and 3:00 PM during the winter solstice.

Figure 10.0-3, Shade & Shadow Analysis: Applicant's Alternative – June 21 Conditions, presents graphic analysis of shade and shadow patterns cast by the proposed project at 9:00 AM, 10:00 AM, 11:00 AM, 12:00 PM, 3:00 PM, 4:00 PM, and 5:00 PM during the summer solstice. **Figure 10.0-4, Shade & Shadow Analysis: Applicant's Alternative – December 21 Conditions**, presents graphic analysis of shade and shadow patterns cast by the proposed project at 9:00 AM, 10:00 AM, 11:00 AM, 12:00 PM, 1:00 PM, 2:00 PM, and 3:00 PM during the winter solstice.

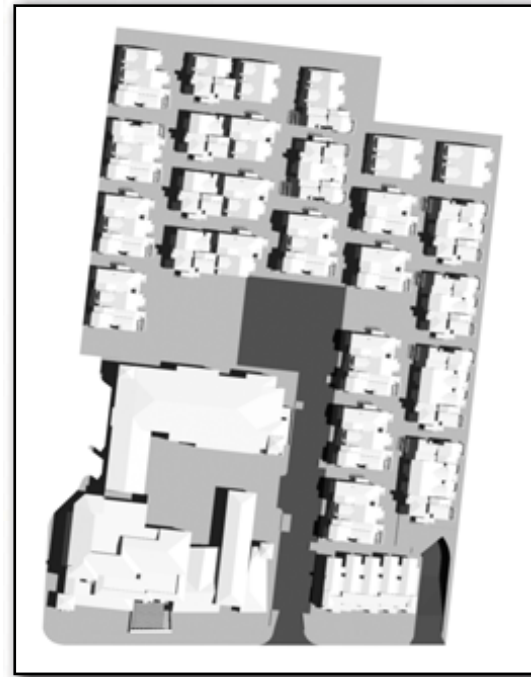
The shade and shadow modeling conducted for the project demonstrates that shadows cast by either the proposed project or the applicant's alternative would not affect existing uses adjacent to the project site.



9:00 AM



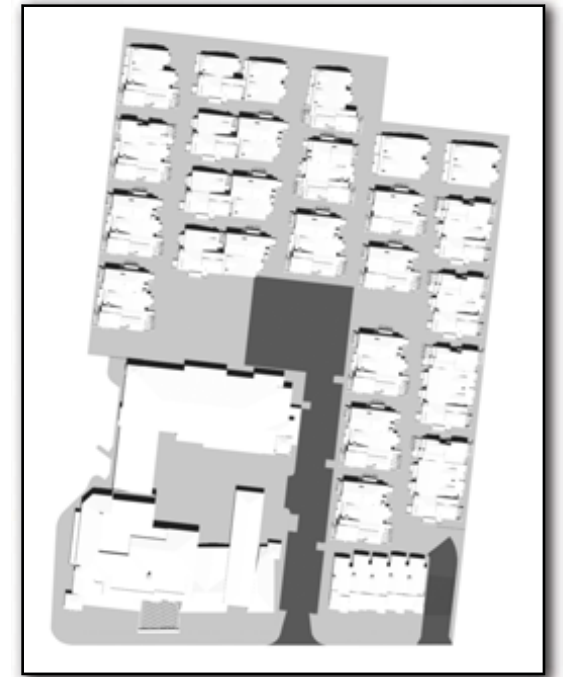
10:00 AM



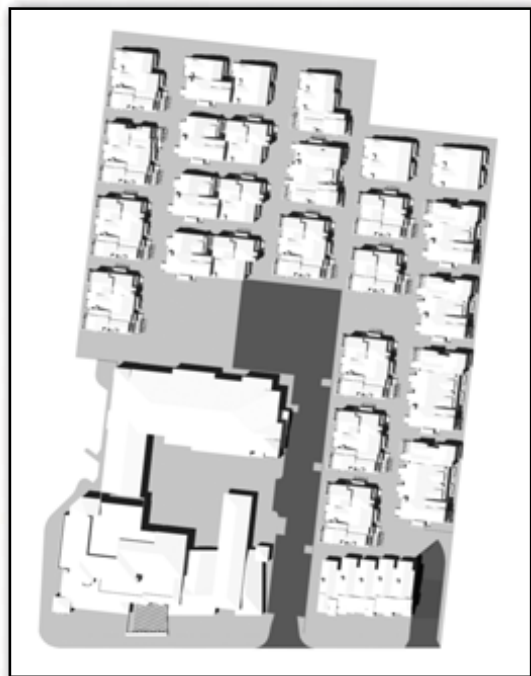
11:00 AM



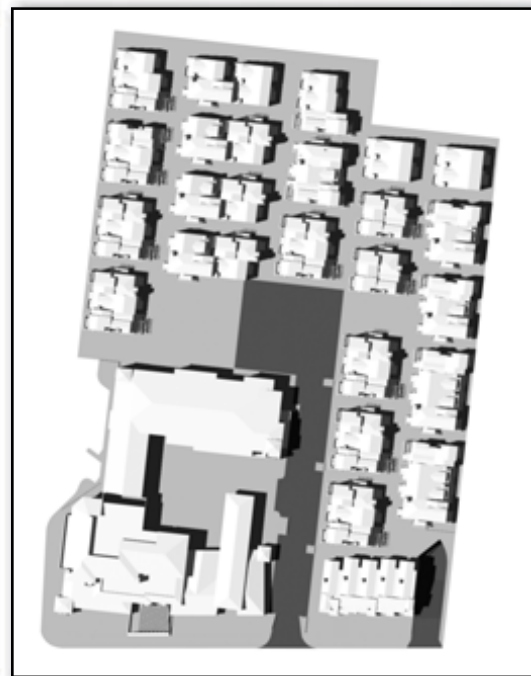
12:00 PM



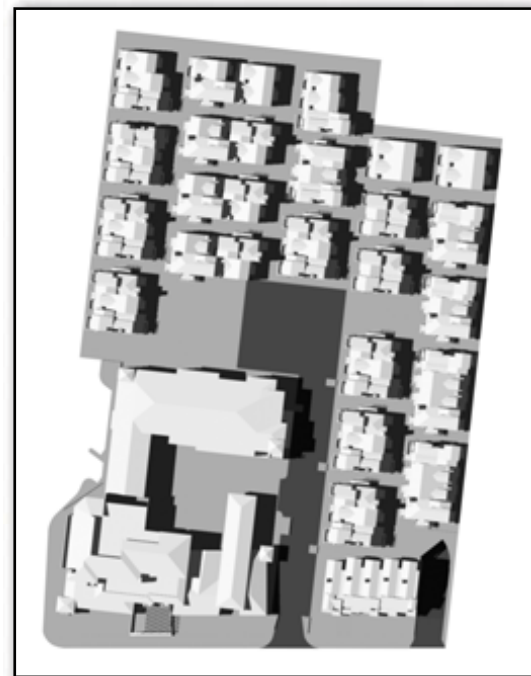
1:00 PM



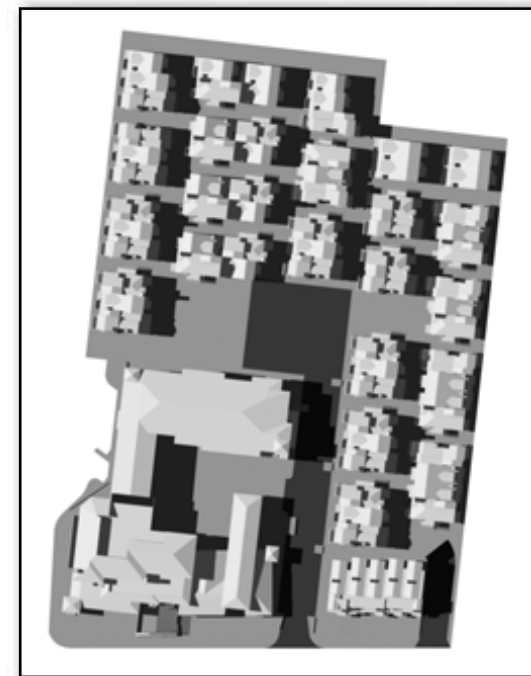
2:00 PM



3:00 PM



4:00 PM



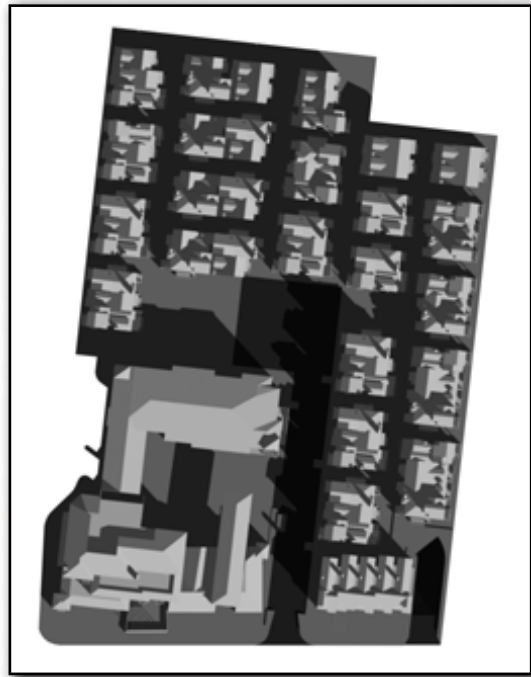
5:00 PM

SOURCE: Impact Sciences, Inc. – December 2008

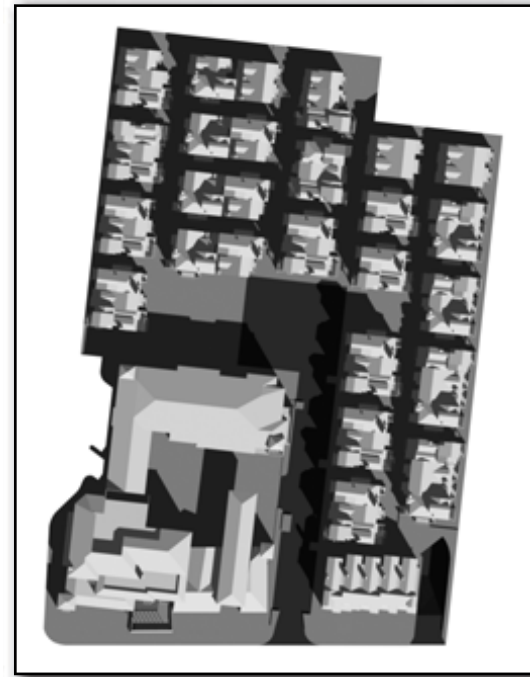
FIGURE 10.0-1

Shade & Shadow Analysis: Proposed Project – June 21 Conditions

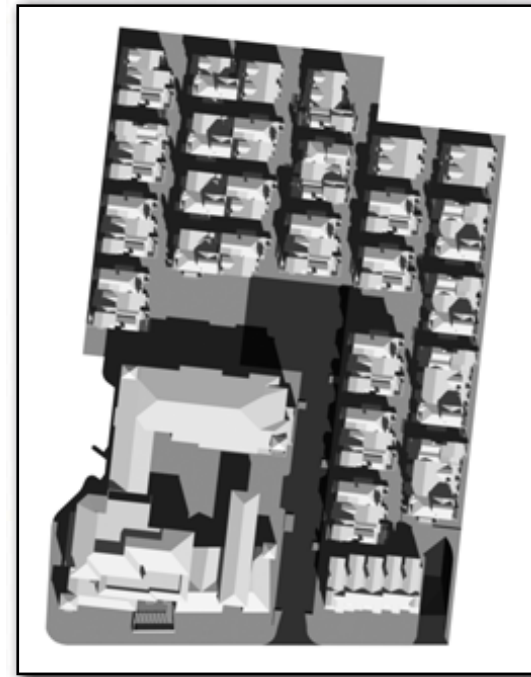




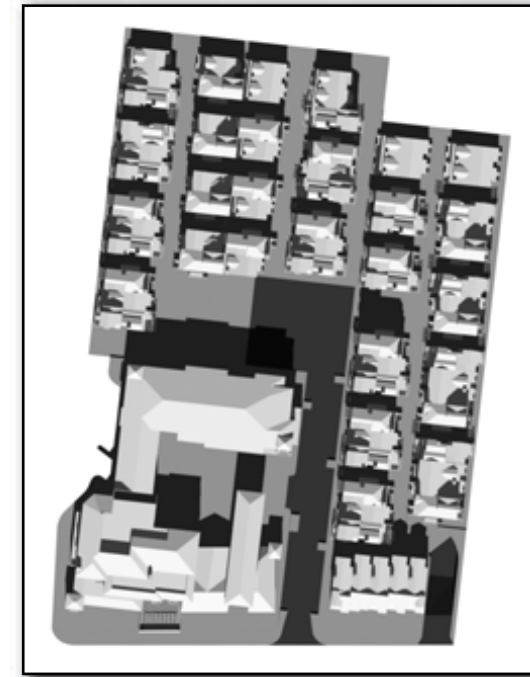
9:00 AM



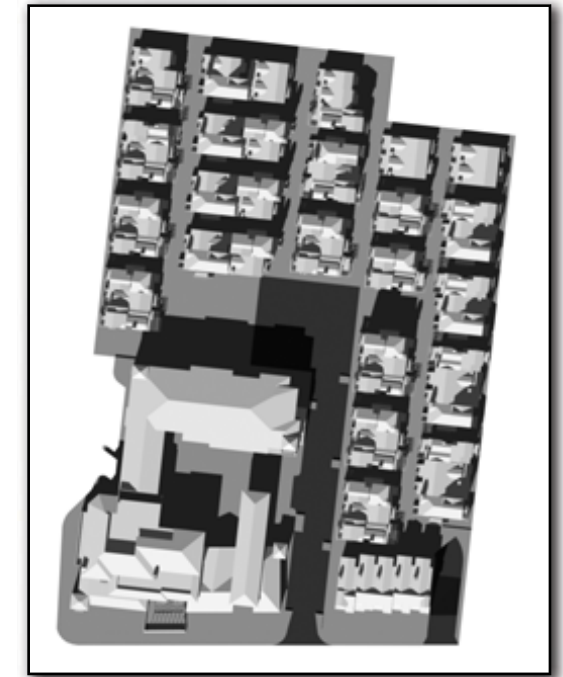
10:00 AM



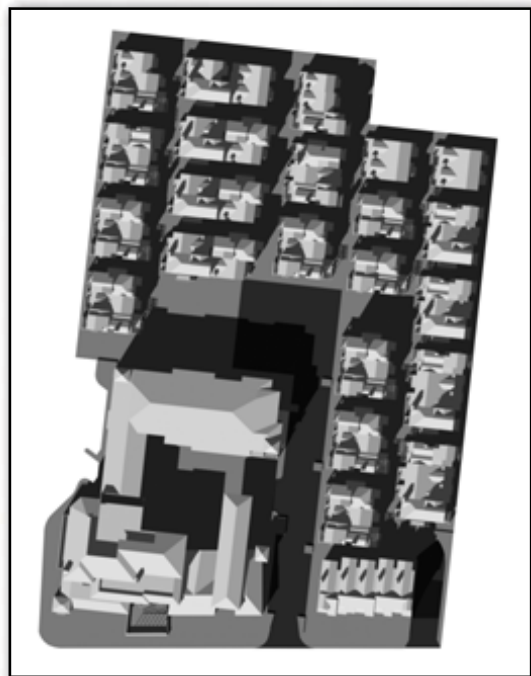
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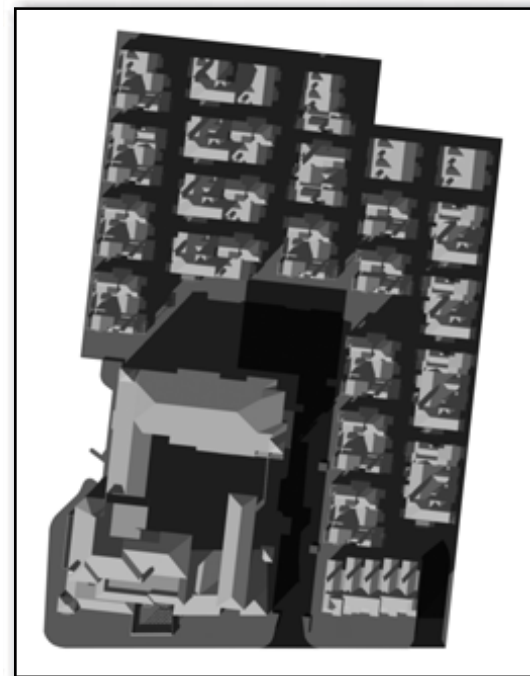
12:00 PM



1:00 PM



2:00 PM



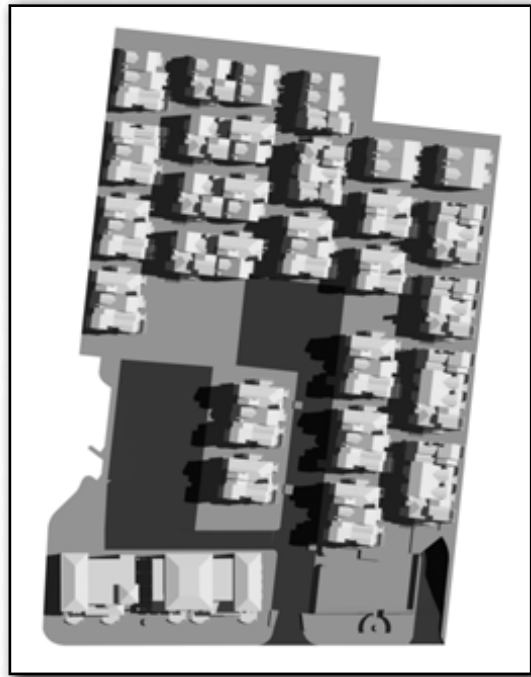
3:00 PM

SOURCE: Impact Sciences, Inc. – December 2008

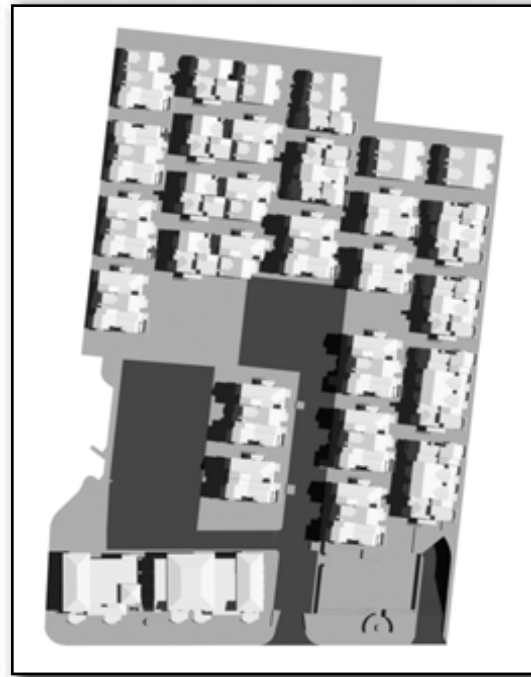
FIGURE 10.0-2

Shade & Shadow Analysis: Proposed Project – December 21 Conditions

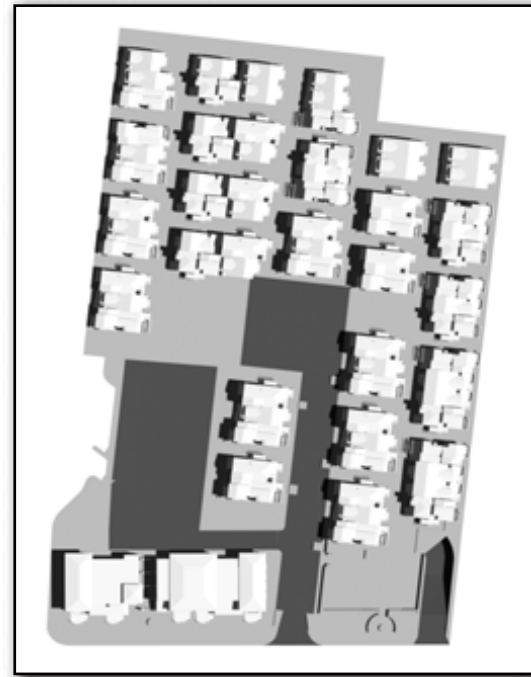




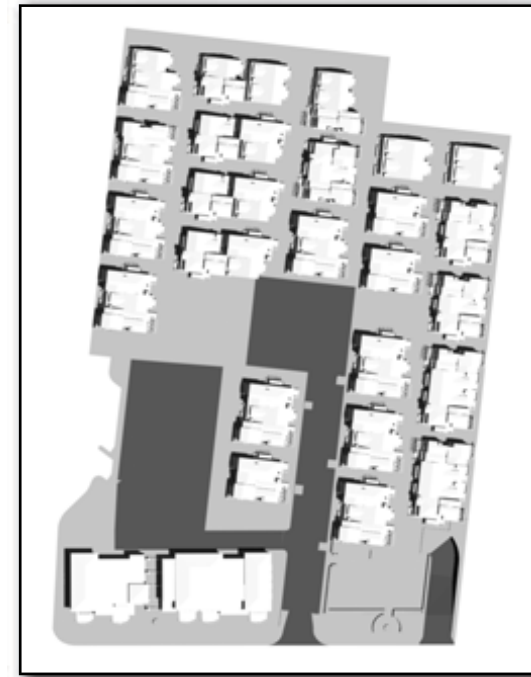
9:00 AM



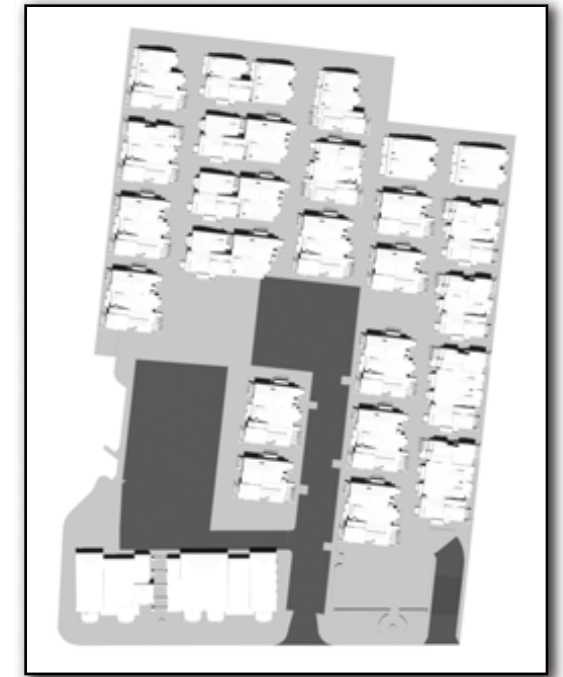
10:00 AM



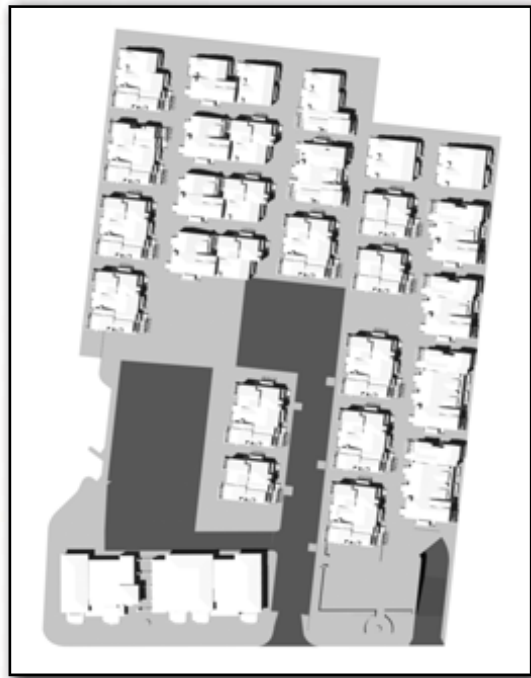
11:00 AM



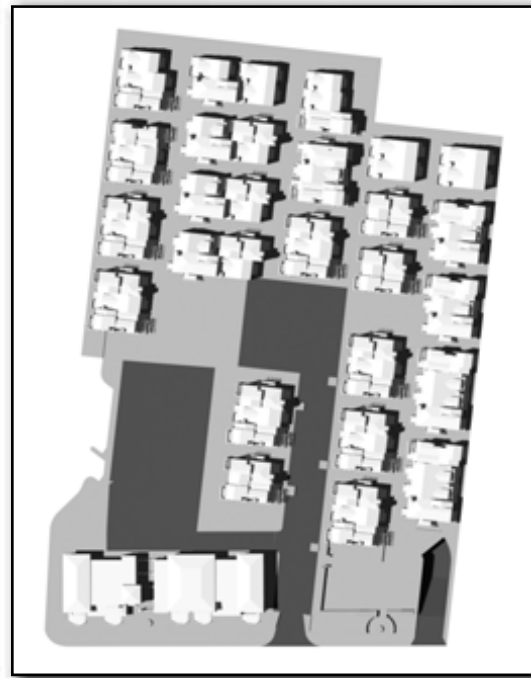
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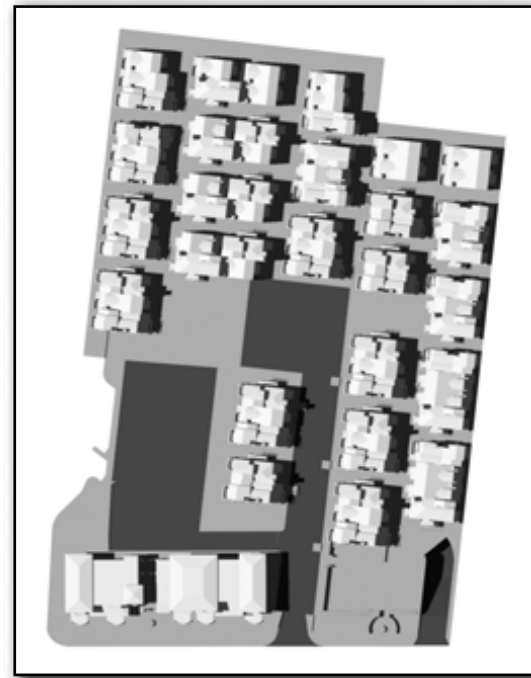
1:00 PM



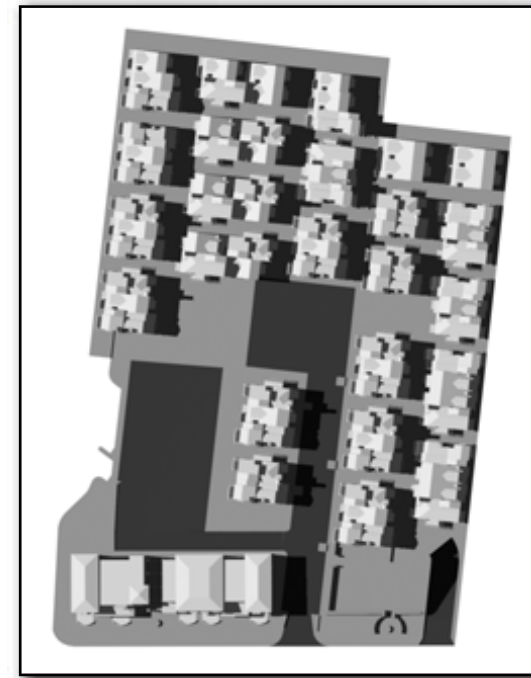
2:00 PM



3:00 PM



4:00 PM

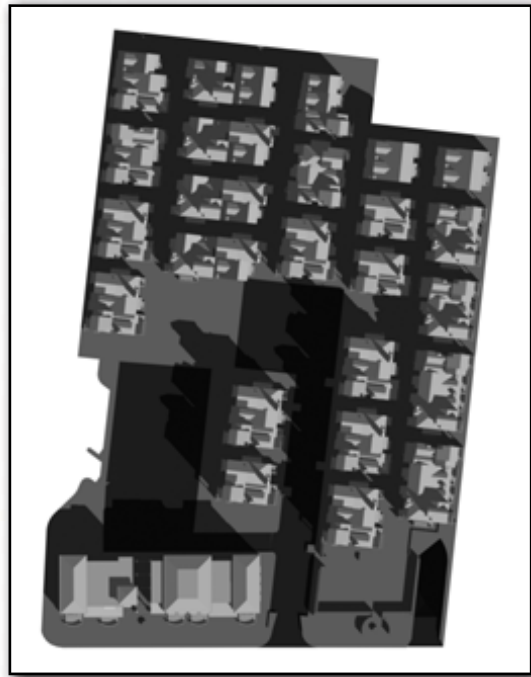


5:00 PM

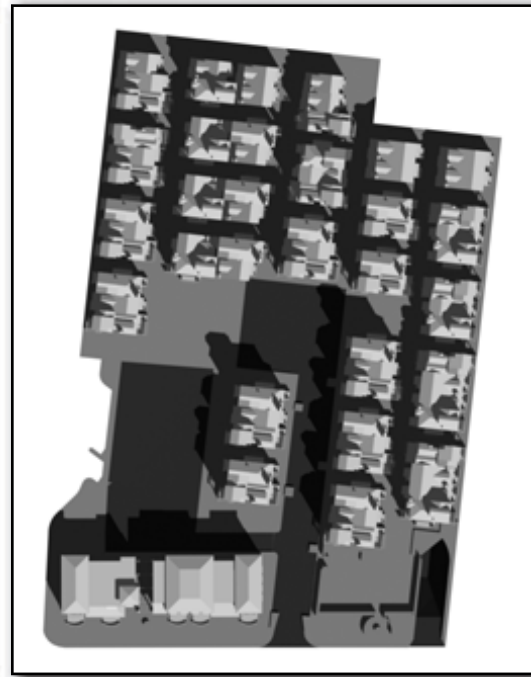
SOURCE: Impact Sciences, Inc. – December 2008

FIGURE 10.0-3

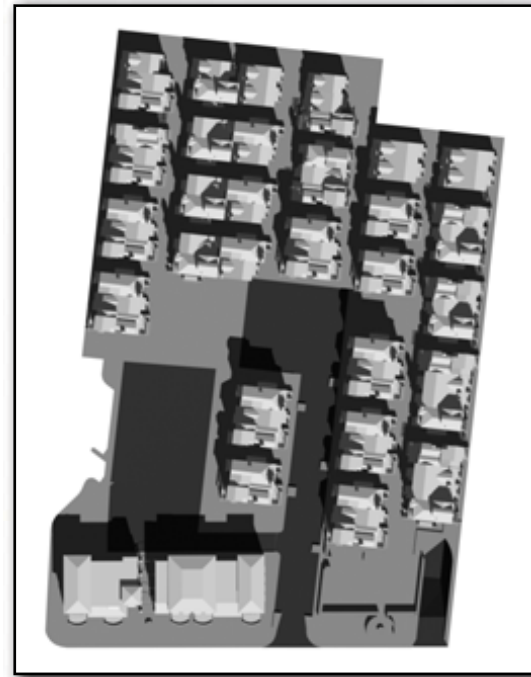
Shade & Shadow Analysis: Applicant's Alternative – June 21 Conditions



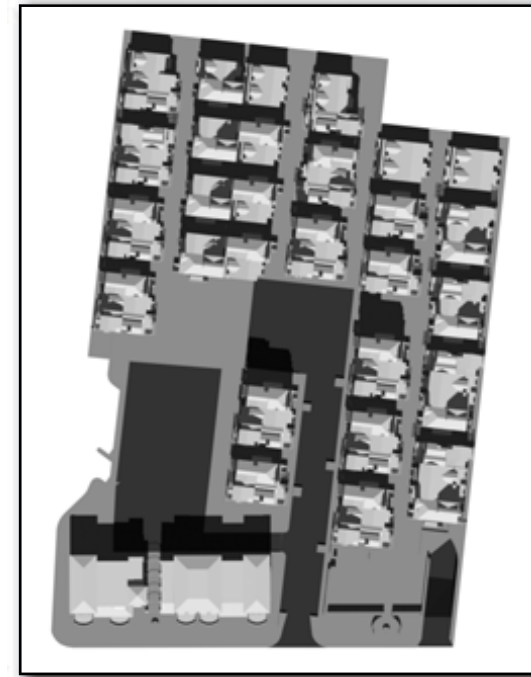
9:00 AM



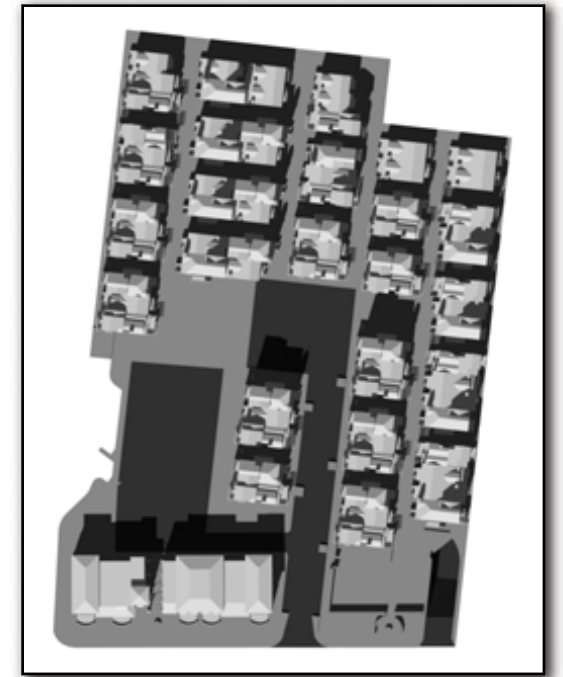
10:00 AM



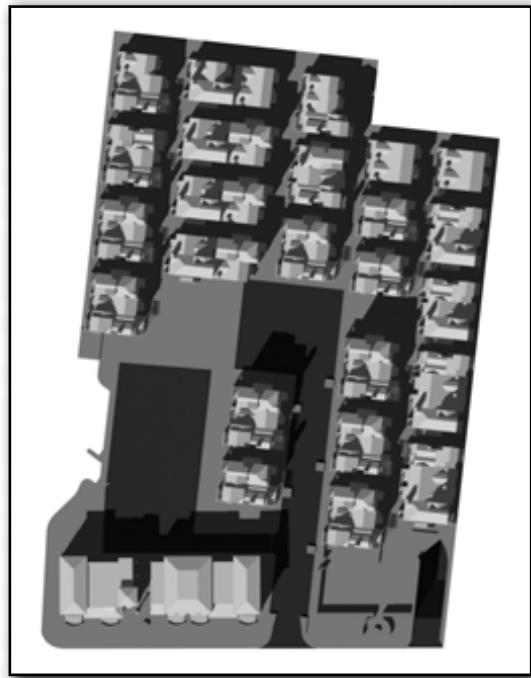
11:00 AM



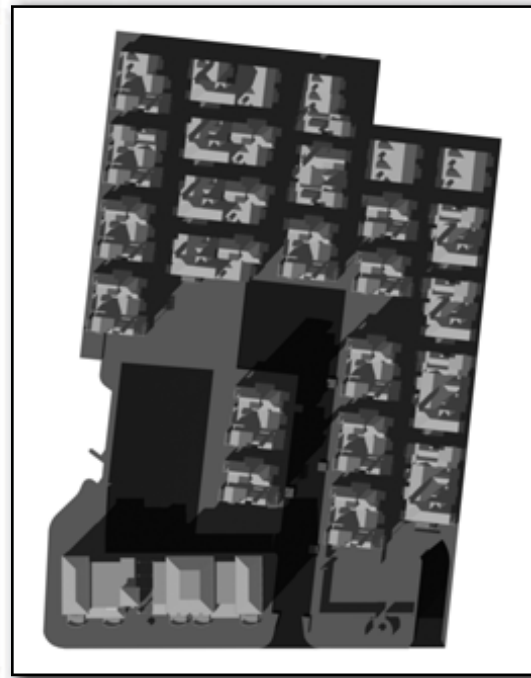
12:00 PM



1:00 PM



2:00 PM



3:00 PM

SOURCE: Impact Sciences, Inc. – December 2008

FIGURE 10.0-4

Shade & Shadow Analysis: Applicant's Alternative – December 21 Conditions



Additionally, the proposed project and applicant's alternative would be consistent with the City of Santa Barbara Municipal Code that regulates protection and enhancement of solar access.²⁵ Therefore, the impact of shade and shadows cast by the proposed project or the applicant's alternative would not inhibit the use of photo-voltaics on site or on adjacent properties.

10.4.3 Consistency with the City of Santa Barbara Energy Ordinance

The proposed project and applicant's alternative would be subject to the requirements of the City's energy ordinance. The ordinance requires that all mandatory measures in the California Title 24 standards be installed, and that the following additional measures, as applicable, be installed:

- All fan and pump motors 1.0 nominal horsepower (HP) or greater must be National Electrical Manufacturers Association (NEMA) premium motors.
- All public and private swimming pools, spas, and fountains must have natural gas heaters with a minimum annual fuel utilization efficiency (AFUE) of 90 percent or greater; and all circulating and filtration pump motors 0.75 horsepower or greater must be two-speed or variable speed. (Exception: dedicated motors serving only spa jets).
- If provided by the builder, all installed home appliances for which there are Energy Star ratings must have the Energy Star label, including refrigerators/freezers, clothes washers, and dishwashers.²⁶

The ordinance also provides requirements for low-rise (three stories or less) buildings. As the proposed project and applicant's alternative include low-rise residential buildings, the following would apply:

- All new single-family homes, multi-family buildings must exceed the 2005 Title 24 energy performance standards by at least 20 percent.
- Solar photovoltaic (PV) systems may be used as a partial credit to achieve the above requirement only if the building exceeds the Title 24 requirements by 15 percent.

For hotels and non-residential buildings, as proposed under the proposed project and applicant's alternative, the ordinance requires that all new construction meet the general compliance using a perspective or performance based approach.

Measures that would be required under the perspective approach include:

- The overall heat gain (HG) of the proposed building envelope as calculated on the Title 24 ENV-3-C form, part 6 of 7, Column I, must be 10 percent less than the standard overall HG on Column M; and

²⁵ City of Santa Barbara, Municipal Code, Chapter 28.11, Protection and Enhancement of Solar Access.

²⁶ Energy Star is a joint program of the US Environmental Protection Agency and the US Department of Energy to reduce energy costs and protect the environment through energy efficient products and practices.

- The overall heat loss (HL) of the proposed building envelope as calculated on the Title 24 ENV-3-C form, part 3 of 7, Column E, must be 10 percent less than the standard over all HL on Column H.

Measures that would be required under the performance approach include:

- Modeling envelope only, the sum of the proposed design heating, cooling and fan energy must be at least 10 percent less than the sum of the same energy component of the standard design; or
- Modeling envelope and mechanical, the sum of the proposed design heating, cooling, fan, pump and heat rejection energy must be at least 10 percent less than the sum of the same energy component of the standard design.
- Solar photovoltaic systems may be used as a partial credit to achieve the above requirement only if the building exceeds the Title 24 standards by at least 5 percent.
- The proposed project and applicant's alternative are required to comply with the requirements of the energy ordinance.

10.4.4 Sustainability/Smart Growth Benefits

The proposed project and applicant's alternative were evaluated to assess sustainability/smart growth benefits using tools such as Built Green Santa Barbara's checklist rating system and smart growth indicators.

Built Green Santa Barbara

Built Green Santa Barbara is a voluntary environmental building program that distinguishes and promotes resource-efficient development, design, and construction.²⁷ Green building practices go beyond energy and water conservation to incorporate environmentally sensitive site planning, resource-efficient building materials, and superior indoor air environmental quality.

The program offers detailed information, materials, and a checklist rating system to help participants. The checklist serves as a guide in making hundreds of decisions that are a usual part of the building process.

²⁷ Built Green Santa Barbara, <http://www.builtgreensb.org/home.html>.

Each Built Green checklist provides the framework for builders or developers to qualify homes, communities, or commercial projects (a checklist for commercial, single-family homes, and communities is under development) for inclusion in one of the four programs. There are several important areas that are addressed in the checklists:

- **Site and Water** - The Built Green program places a high priority on water conservation and quality. The action items include practices to conserve water, protect natural features, prevent erosion, and to promote and otherwise improve water quality.
- **Energy Efficiency** – A Built Green home or building can be designed and constructed to maximize energy savings by reducing heat loss through a combination of design elements and building practices, thereby making the home or building more economical to operate.
- **Indoor Air Quality** – Indoor air quality can be improved through a series of practices and features that reduce indoor pollutants such as installing low-toxicity finishes.
- **Material Selection** – Builders use design and material selections that can result in conserving limited resources. Using recycled-content products reduces the use of "virgin" materials. Using current waste-minimizing practices can contribute to the overall efficiency of the project. Encouraging builders to use locally manufactured products also reduces the energy used to get them to the job site.

The program includes a voluntary self-certification building process designed to create market distinction for builders, architects, and property owners who incorporate green building practices in their projects.

When construction is complete, the builder or architect submits a signed copy of the checklist to the Santa Barbara Contractors Association (SBCA), certifying that the project identified in the application contains the identified features. Based upon that builder/architect certification and verification where applicable, and after reviewing the application, the SBCA will award the appropriate Certificate of Merit indicating that the project has achieved a 1-, 2-, or 3- star rating. A copy of the checklist is provided in **Appendix 10.0**. The requirements for each of the star ratings are:

- 1-Star Level – 50 Points Total
 - All star-designated items, 50 points, plus orientation
 - Attend Program Orientation (one time only).
 - Earn 50 points. Minimum 10 percent of points from each of Sections Two, Three and Four.
 - Build to Local Codes
 - Prepare/Implement Construction Erosion & Sediment Control Plan
 - Design/Install exterior lighting to eliminate light pollution
 - Develop and Implement a Construction Waste Management Plan
 - Provide Waste Reduction Resource Sheet to trades
 - Prepare/post a jobsite recycling plan

- Provide Building Operations & Maintenance Manual
- 2-Star Level – 100 Points Total
- Meet 1-Star requirements.
 - Earn additional points to meet the minimum 100 points. Minimum 10 percent of points from each of Sections Two, Three, and Four.
 - Attend a BUILT GREEN™ approved workshop within past 12 months prior to certification.
- 3-Star Level – 175 Points Total
- Meet 2-Star requirements.
 - Earn 75 additional points to meet the minimum for [the appropriate] project category.
 - Minimum 10 percent of points from each of Sections Two, Three, and Four.

Sustainability/Smart Growth Evaluation

The applicant provided information on smart growth principals that would be included within the Sandman Inn Redevelopment Project.²⁸ These are provided in **Table 10.0-23, Smart Growth Principals** ~~Principals~~ **Principles within the Sandman Inn Redevelopment & Townhome Project.**

Additionally, the applicant provided the following discussion of smart growth and green aspects:²⁹

The Project is a “Smart Growth Project” designed to provide the many substantial benefits of “Smart Growth.” It is a redevelopment of a vastly under utilized, sprawling, asphalt dominated motel property at or near the end of its useful life. The Project results in much more efficient uses of the land space by concentrating the visitor serving uses on a smaller portion of the site and adding new residential development to the site. The Project contemplates development on an existing under utilized in-fill site located on a major traffic corridor near schools, places of employment, shopping and recreation. A summary of the Project’s many Smart Growth features is attached as Appendix A. These aspects of the Project should be considered by the EIR and factored in as mitigations of the impact of the proposed Project. The Project has also been designed to be a “green” project. The Project owner has researched and intends to incorporate many “green” building features and environmentally sensitive and friendly aspects into the Project. The Owner’s design guidelines for the Project will focus on particular “green” aspects. At the time of the Project hearings, specific green building approaches (such as specific materials selections, specific building elements and technologies, etc.) will be identified and presented for consideration.

²⁸ Letter from Gregory Parker, Executive Vice President, Investec Properties, Inc. to Allison DeBusk, Planning Division, City of Santa Barbara, Re: Comments to Draft Initial Study MST 2003-00286, Sandman Inn Project 3714-3748 State Street, June 26, 2008, Appendix A – Summary of Smart Growth Features.

²⁹ Ibid.

The proposed project and applicant's alternative were preliminarily evaluated using the Commercial Self-Certification Checklist, established by Built Green Santa Barbara.³⁰ The preliminary evaluation utilized information available from the site plans and included only the site selection and development criteria from the checklist.

As a result of the evaluation, the preliminary site ratings are provided in **Table 10-34, Preliminary Green Santa Barbara Checklist Considerations – Sandman Inn Redevelopment Project, Site Selection and Development.**

Based on the preliminary rating, the proposed project and the applicant's alternative would both score 69. Therefore, both projects would rate at the 1-Star Level on the Green Santa Barbara checklist. This preliminary rating is based on the level of detail provided at this stage of the development process. A qualified contractor would need to prepare a formal worksheet once construction plans are in place.

³⁰ Built Green Santa Barbara, "Commercial Self-checklist," <http://www.builtgreensb.org/home.html>.

Table 10.0-2
Project Smart Growth Principles within the Sandman Inn Redevelopment & Townhome
Project Identified by Project Applicant

Principal	Project Feature Proposed Project/(Applicant's Alternative)
<p>Create Range of Housing Opportunities and Choices Providing quality housing for people of all income levels is an integral component in any smart growth strategy.</p>	<ul style="list-style-type: none"> • Housing diversity via a range of home types, sizes, and scales accommodate various lifestyle and household types in the project. • 23%/(25%) of units (18/[18]) are 903 sf or less. • 19%/(19%) of units (14)/[14] are 904–1251 sf. • 23%/(26%) of units ((17/[19]) are 1252–1448 sf. • 35%/(30%) of units (25/[22]) are 1449–1531 sf. • Affordable ownership housing via municipal programs. • Affordable ownership housing via small unit size (lower market price)
<p>Create Walkable Neighborhoods Walkable communities are desirable places to live, work, learn, worship and play, and therefore a key component of smart growth.</p>	<ul style="list-style-type: none"> • The project creates a coherent non-auto-oriented pedestrian network of ways and paseos connecting residences and the hotel to State Street. • Sidewalks and related pedestrian amenities all along the project frontage and at the State/Hitchcock intersection are improved and widened. • Neighborhood consideration of buildings, open spaces, walkable streets and pedestrian networks created inter-property collaboration to create resident interconnections and direct pedestrian connections to State Street for project neighbors
<p>Encourage Community and Stakeholder Collaboration Growth can create great places to live, work and play—if it responds to a community's own sense of how and where it wants to grow.</p>	<ul style="list-style-type: none"> • The Outer State Street Study provides a valuable framework for the City, individual property owners and the community at large to discuss the potential for positive change along State Street. • Community dialogue and consensus by City decision-makers on key topics such as traffic projections, required parking, desired building setbacks, the importance for mixed-use development along State Street, and the role of maintaining mountain views to creating a vibrant pedestrian experience is essential to allow individual projects to move forward as catalysts of positive change.
<p>Foster Distinctive, Attractive Communities with a Strong Sense of Place Smart growth encourages communities to craft a vision and set standards for development and construction which respond to community values of architectural beauty and distinctiveness, as well as expanded choices in housing and transportation.</p>	<ul style="list-style-type: none"> • Green planning and livable design—with an uptown village feel—allows neighbors to interact with services close at hand in a walkable and bikeable neighborhood. • The project's central multi-use plaza and connecting open space provide for passive and active uses and create a lively shared amenity for all residents.
<p>Make Development Decisions Predictable, Fair and Cost Effective For a community to be successful in implementing smart growth, it must be embraced by the private sector.</p>	<ul style="list-style-type: none"> • The project illustrates the critical need for a new land planning paradigm for Outer State Street which de-emphasizes the role of the automobile in favor of creating places for people to live, work, and play.
<p>Mix Land Uses Smart growth supports the integration of mixed land uses into communities as a critical component of achieving better places to live.</p>	<ul style="list-style-type: none"> • The project rehabilitates an urban site to maintain existing City-serving hotel use/(replace existing hotel use with office use) while providing market rate and affordable housing—the City's highest development priority. • The Outer State Street corridor is a key area of the City that will benefit greatly from residential development to shift the area from auto-focused, commercial serving land planning to people -places.

Principal	Project Feature Proposed Project/(Applicant's Alternative)
<p>Preserve Open Space, Farmland, Natural Beauty and Critical Environmental Areas</p> <p>Open space preservation supports smart growth goals by bolstering local economies, preserving critical environmental areas, improving our communities' quality of life, and guiding new growth into existing communities.</p>	<ul style="list-style-type: none"> • Redevelopment of this key urban site in the City becomes a catalyst for continued improvements nearby and promotes rehabilitation of the existing urban fabric as opposed to greenfield development. • The project frames a key view to the Santa Barbara foothills while creating a needed urban vitality and street presence along State Street to provide pedestrian-serving amenities • Extensive site landscaping fosters livability and biodiversity, maximizing drought tolerant and low-maintenance plantings, with reuse of some existing healthy palm trees on site.
<p>Provide a Variety of Transportation Choices</p> <p>Providing people with more choices in housing, shopping, communities, and transportation is a key aim of smart growth.</p>	<ul style="list-style-type: none"> • Transit: Located along the City's primary transit corridor, the project is designed to participate in local & regional transit/transportation solutions • Transit amenities: New and rehabilitated MTD bus stops as project components • Biking: Located along a primary City bikeway with close connections to routes serving all areas of the region, and with storage space for bicycles provided at each unit. • Pedestrian & Bicycle Orientation – less than 5-minute walking/biking distance to local job opportunities, retail, and community services via a connected network of pedestrian and cycling ways. • Other services: Project is well situated to take part in City and regional ride-share, van-pool, and telecommuting programs and initiatives
<p>Strengthen and Direct Development Towards Existing Communities</p> <p>Smart growth directs development towards existing communities already served by infrastructure, seeking to utilize the resources that existing neighborhoods offer, and conserve open space and irreplaceable natural resources on the urban fringe.</p>	<ul style="list-style-type: none"> • Homes, porches, yards, and open space replace 3+ acres of asphalt dramatically improving local livability and setting the tone for future improvements in Uptown. • The project setting and design allows independence for all ages and incomes, and the integration into the community fosters a broader participation in civic life. • Shops, grocery stores, restaurants, and recreational amenities abound within walking distance. • Hotel/(Offices) and residences complement and diversify retail uses along State St., enlivening the corridor and contributing to long-term stability. • Equidistant from downtown Santa Barbara, Goleta, and UCSB, the project offers close connections to local and regional centers. • Housing in town lessens Santa Barbara's local jobs/housing imbalance
<p>Take Advantage of Compact Building Design</p> <p>Smart growth provides a means for communities to incorporate more compact building design as an alternative to conventional, land consumptive development.</p>	<ul style="list-style-type: none"> • Effective site planning allows more residences in the project while fostering small overall building sizes, individual front doors with porches, more light and air into each home, all main living areas at grade with strong connections to the outdoors, and greater privacy of each individual unit (no stacking of occupancy). • Underground parking accommodates cars and unit storage, allowing main living spaces to be on the ground level; also connected to useable private and public outdoor living spaces. • Building orientation and design to maximize daylighting, passive heating and cooling, views and natural ventilation. Living spaces are integrated into the natural environment. • Underground parking eliminates large parking footprint and heat island effect.

Please note: These features apply to both the proposed project and the applicant's alternative. Any changes related to the applicant's alternative are identified in parentheses

**Table 10.0-3
Preliminary Green Santa Barbara Checklist Considerations – Sandman Inn Redevelopment Project
Site Selection and Development**

No.	Category/Criteria	Point Value Range	Proposed Project Rating	Applicant's Alternative Rating
Site Selection				
2-1	Reuse or renovate an existing building.	3-5	0	0
2-2	Build on an infill lot.	3	3	3
2-3	Develop a mixed-use property.	3	3	3
2-4	Locate in an established, pedestrian-friendly community with a minimum density of 60,000 square feet per net acre (two story downtown development), OR walkable access within 0.25 mile of 6 or more specified community services.	10	5	5
2-5	Provide on-site cafeteria, day care center, gym or other tenant/employee amenities if these are not available within 0.25 mile (see item 2-4).	2-6	2	2
2-6	Locate within 0.5 mile of a commuter rail, light rail or subway station, or 0.25 mile of two or more campus bus lines usable by tenant occupants.	5	0	0
Site Development				
2-7	Provide and Implement construction erosion and sedimentation control plan.	Star ¹	Star	Star
2-8	Orient building to optimize: (a) solar access; and (b) access to prevailing breezes. (3 points each).	3-6	3	3
2-9	Use surfaces and appropriate shading to reduce the urban heat island effect.	2-10	8	8
2-10	Use light-colored materials for roofing to reduce urban heat island effect.	5	5	5
2-11	Install a vegetated roof. (50% of roof – 10 points, 80% of roof – 15 points).	10-15	0	0
2-12	Optimize accessibility beyond ADA compliance.	5	3	3
2-13	Design and install exterior lighting to eliminate light pollution (Ref. City of Santa Barbara Light Pollution Ordinance).	Star	Star	Star
2-14	Provide secure bicycle storage, with convenient changing/shower facilities.	5	3	3
2-15	Minimize parking and provide preferred parking for carpools, vanpools and hybrid/alternative fuel vehicles: (a) Meet, not exceed code req. MIN. parking – 3 pts (b) Reduce parking by 10% or better BELOW req. MIN. parking – 5 pts.	3-5	3	3
2-16	Provide lease/on-site parking for car-share program.	3	0	0
2-17	Provide improved pedestrian and non-motorized access to the site.	5	5	5

No.	Category/Criteria	Point Value Range	Proposed Project Rating	Applicant's Alternative Rating
Water Quality Protection and Conservation				
2-18	Minimize disturbance to site.	5	3	3
2-19	Use low-toxic construction and landscape materials.	3	3	3
2-20	Implement Low Impact Development strategies to reduce and/or treat stormwater runoff. Three points for each strategy (see list) in an integrated stormwater management plan. Max 15 points.	3-15	9	9
2-21	Preserve in place/reuse existing landscaping where appropriate.	2	1	1
2-22	Landscape with water wise plants, native plants, and no turf.	2	1	1
2-23	Use greywater in place of potable water for allowable uses.	10	0	0
2-24	Install efficient irrigation system (or see 2-23).	5	4	4
2-25	Install no permanent irrigation system (or see 2-22).	10	0	0
Innovation				
2-26	Include innovative design, equipment, and operation solutions to protect the site's natural features, conserve water, and reduce impact on water resources.	4-10	5	5
Totals		103-146	69	69

Notes: 1 – Star indicates required items.

11.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

11.1 INTRODUCTION

This section is based on the Initial Study and Notice of Preparation (IS/NOP), dated May 22, 2008, and contained in **Appendix 2.0** of this environmental impact report (EIR). The IS/NOP was prepared to identify the potentially significant effects of the proposed project; it was circulated for public review between May 27 and June 25, 2008.

In the course of this evaluation, certain impacts were found to be less than significant because the proposed project's characteristics would not create such impacts. The effects determined not to be significant are not required to be included in primary analysis sections of the draft EIR. In accordance with *California Environmental Quality Act (CEQA) Guidelines* Section 15128, this section provides a brief description of effects found not to be significant or less than significant based on the IS/NOP comments or more detailed analysis conducted as part of the EIR preparation process. Note that a number of impacts that are found to be less than significant are addressed in the various EIR topical sections (**Sections 6.0 through 8.0**) to provide a more comprehensive discussion of why impacts are less than significant, in order to better inform decision makers and the general public.

11.2 EFFECTS FOUND NOT TO BE SIGNIFICANT

The following issues were determined to be not significant. Issues are listed on the Initial Study checklist (see **Appendix 2.0**) and are numbered accordingly.

11.2.1 Aesthetics

Proposed Project

Impacts

Could the project

1c. Create light or glare?

The project is located in a commercial/residential area with the nearest residence located 50 feet from the project site. Existing night lighting in the area is generally in parking lots and for security purposes around buildings. A lighting plan has not been provided for the proposed project; however, lighting is anticipated for security purposes. Additionally, interior lighting of residences would be visible from off site. New exterior lighting would be required to comply with the requirements of the City's Outdoor

Lighting and Design Ordinance¹, which limits exterior lighting placement and height, and requires that lighting be hooded and directed so that it does not illuminate areas off site. Compliance with this ordinance, as enforced by Architectural Board of Review (ABR) review of the lighting plan, would ensure that exterior lighting does not result in a significant impact. Spillover of interior lighting would adversely increase lighting of the night sky in the area; however, this impact is considered less than significant.

Required Mitigation Measures

No additional mitigation is required.

Applicant's Alternative

Impacts

Could the project

1c. Create light or glare?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No additional mitigation is required.

11.2.2 Air Quality

Proposed Project

Impacts

Could the project

2a. Conflict with or obstruct implementation of the applicable air quality plan?

Direct and indirect emissions associated with the project are accounted for in the Clean Air Plan (CAP) emissions growth assumptions. Appropriate air quality mitigation measures, including construction dust suppression, would be applied to the project, consistent with CAP and City policies. The project could be found consistent with the CAP.

¹ City of Santa Barbara, Municipal Code, Section 22.75.

2b. Exceed any City air quality emission threshold? Long-term?

Substantial long-term project emissions could potentially stem from stationary sources, which may require the Santa Barbara County Air Pollution Control District (SBCAPCD) permits, from motor vehicles associated with the project, and mobile sources including the automobile. The proposed project does not contain any stationary sources (e.g., gas stations, auto body shops, dry cleaners, oil and gas production and processing facilities, and water treatment facilities) which require permits from SBCAPCD.

Utilizing the URBEMIS 9.2.4 computer model, it is estimated that the proposed project will generate 16.21 pounds per day of oxides of nitrogen (NO_x) and 16.58 pounds per day of reactive organic gases (ROG). Using the same model, it is estimated that the existing development generates 15.09 pounds per day of NO_x and 11.54 pounds per day of ROG. The proposed project would result in a net increase in NO_x of 1.12 pounds per day and a net increase in ROG of 5.04 pounds per day. Therefore, the proposed project is anticipated to have a less than significant impact on the environment related to long-term emissions.

2c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated in non-attainment under an applicable federal or state ambient air quality standard?

Since project impacts do not exceed the significance thresholds and the project is consistent with the CAP, project cumulative impacts would be less than significant.

2d. Expose sensitive receptors to substantial pollutants?

The proposed project would generate 1,535 average daily trips (ADTs) which is 216 ADTs less than are currently generated by the existing uses on the project site.² Additionally, the proposed project would generate less than 127 peak hour vehicle trips AM or PM peak hour. Therefore, the project would be unlikely to generate dangerous concentrations of carbon monoxide at any location. Additionally, the proposed project does not include stationary sources. However, sensitive receptors could be affected by dust and particulates during project site grading. As described above, impacts associated with dust and particulates are considered potentially significant, though mitigable through application of dust control mitigation measures. Therefore, the less than significant amounts of dust and particulates would result in a less than significant impact related to exposure of sensitive receptors to these pollutants. A detailed

² Associated Transportation Engineers, *Revised Trip Generation Analysis for the Sandman Inn Project*, November 13, 2007.

analysis of air quality impacts associated with construction of the proposed project is provided in **Section 6.0, Air Quality**, of this EIR.

2e. Create objectionable odors affecting a substantial number of people?

The proposed project would not contain features with the potential to emit substantial odorous emissions from sources such as commercial cooking equipment, combustion or evaporation of fuels, sewer systems, or solvents and surface coatings. Due to the nature of the proposed land use and limited size of the project, project impacts related to odors are considered less than significant.

Required Mitigation Measures

The mitigation measures (**Mitigation Measure AQ-1 to AQ-13**) provided in **Section 6.0, Air Quality**, shall be implemented.

Applicant's Alternative

Impacts

Could the project

2a. Conflict with or obstruct implementation of the applicable air quality plan?

Same as proposed project.

2b. Exceed any City air quality emission threshold? Long-term?

Substantial long-term project emissions could potentially stem from stationary sources, which may require the Santa Barbara County Air Pollution Control District (SBCAPCD) permits, from motor vehicles associated with the project, and mobile sources including the automobile. The proposed project does not contain any stationary sources (e.g., gas stations, auto body shops, dry cleaners, oil and gas production and processing facilities, and water treatment facilities) which require permits from SBCAPCD.

Again, using URBEMIS 9.2.4, it is estimated that the applicant's alternative will generate a maximum of 8.57 pounds per day of NOX and 10.01 pounds per day of ROC. Utilizing the same model, it is estimated that the existing development generates a maximum of 14.28 pounds per day of NOX and 12.66 pounds per day of ROC. The applicant's alternative would result in a net reduction in NOX of 5.71 pounds per day and a net reduction in ROC of 2.65 pounds per day. Therefore, the applicant's alternative is anticipated to have a less than significant impact on the environment related to long-term emissions.

- 2c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated in non-attainment under an applicable federal or state ambient air quality standard?

Same as proposed project.

- 2d. Expose sensitive receptors to substantial pollutants?

The applicant's alternative would generate 899 ADTs which is 852 ADTs less than are currently generated by the existing uses on the project site.³ Additionally, the applicant's alternative would generate less than 99 peak hour vehicle trips for either the AM or PM peak hour. Therefore, the project would be unlikely to generate dangerous concentrations of carbon monoxide at any location. Additionally, the applicant's alternative does not include stationary sources. However, sensitive receptors could be affected by dust and particulates during project site grading. As described above, impacts associated with dust and particulates are considered potentially significant, though mitigable through application of dust control mitigation measures. Therefore, the less than significant amounts of dust and particulates would result in a less than significant impact related to exposure of sensitive receptors to these pollutants. A detailed analysis of air quality impacts associated with construction of the applicant's alternative is provided in **Section 6.0, Air Quality**, of this EIR.

- 2e. Create objectionable odors affecting a substantial number of people?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. **Mitigation Measures AQ-1 to AQ-13** provided in **Section 6.0, Air Quality**, shall be implemented.

³ Associated Transportation Engineers, *Revised Trip Generation Analysis for the Sandman Inn Project*, November 13, 2007.

11.2.3 Biological Resources

Proposed Project

Impacts

Could the project

- 3a. Endangered threatened or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)?
- 3c. Natural communities (e.g., oak woodland, coastal habitat, etc.).
- 3d. Wetland habitat (e.g., marsh, riparian, and vernal pool)?
- 3e. Wildlife dispersal or migration corridors?

As recognized by the City of Santa Barbara *Master Environmental Assessment*, the project site is located in a portion of the City that is almost entirely urbanized, where biological resources are limited. Vegetation on the project site is characterized primarily by specimen non-native plant material, mainly sub-tropical plants such as palms, bird of paradise, yucca, and tupidanthus, as well as jacaranda, coral and one cedar tree. No endangered, threatened, or rare species or their habitats currently listed or identified as being candidates for state or federal protection are present at this site. The project site does not support any contiguous natural communities or function as an important wildlife movement or dispersal area. No wetlands exist on the project site. The proposed project would not result in any significant impacts to these resources, their habitats, or wildlife movement opportunities. Project impacts to biological resources would be less than significant.

The vegetation on site has limited habitat value for roosting and foraging by urban-adapted species, such as by birds and invertebrates. However, given the amount, height, and type of trees and vegetation currently existing on site—all of which are proposed to be removed as part of the project—there may be an adverse, but less than significant, impact on birds and invertebrates. A recommended mitigation measure is included to reduce possible disturbances to nesting species to further reduce this less than significant impact.

3b. Locally designated historic, Landmark or specimen trees?

Mature native and non-native specimen trees provide numerous benefits to the environment, including visual beauty, shade, soil stability, air quality, and localized habitat for urban-adapted wildlife species such as birds. City policies address the protection, maintenance, and replacement of mature trees, and require replacement on a minimum one-to-one basis when removed.

The project site includes approximately 205 mature trees and ornamental plants, according to the tree inventory prepared for the site.⁴ There are no City-designated specimen, historic, or landmark trees on the site. The majority of the trees on site are palm trees. All of the trees on site are proposed to be removed, although approximately 80 of the trees are proposed to be transplanted for reuse in the new development. The preliminary landscape plans for the proposed project (See **Figure 3.0-11**) include enhanced street tree planting and placement of trees in planters around the perimeter of the site. Skyline trees are proposed to screen adjacent commercial uses. The removal of existing skyline trees and vegetation is considered a less than significant impact related to biological resources.

Required Mitigation Measures

No mitigation is required.

Recommended Mitigation Measure

The following mitigation measure should be implemented:

BIO-1: Seasonal Restriction. Removal of trees during initial site development should be limited to the time period between September 1 and January 31. If tree removal or construction is to occur during the bird nesting season (February 1 through August 31), a City-approved biologist shall conduct a survey at the site for active nests two weeks prior to any scheduled tree removal, tree pruning, development, or grading. If active nests are located, setbacks for construction work would be required until the nest is no longer active or the young have fledged. If no active nests are found, the construction, tree removal, or grading restrictions specified in this section shall not apply.

⁴ Charlie Eckberg, *Tree Study/Inventory, Sandman Inn 3714 State Street, Santa Barbara*, prepared for Investec, December 1, 2006.

Applicant's Alternative

Impacts

Could the project

- 3a. Endangered threatened or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)?
- 3c. Natural communities (e.g., oak woodland, coastal habitat, etc.).
- 3d. Wetland habitat (e.g., marsh, riparian, and vernal pool)?
- 3e. Wildlife dispersal or migration corridors?

Same as proposed project.

- 3b. Locally designated historic, Landmark or specimen trees?

Same as proposed project (See **Figure 3.0-15**).

Required Mitigation Measures

Same as proposed project. No mitigation is required.

Recommended Mitigation Measures

Same as proposed project. **Mitigation Measure BIO-1** should be implemented.

11.2.4 Cultural Resources

Proposed Project

Impacts

Could the project

- 4a. Disturb archaeological resources?

The project site is not located within a prehistoric or historic cultural resources sensitivity area. However, as with any ground-disturbing activity, there is the remote possibility of encountering unknown buried deposits. For this reason, contractors and construction personnel should be alerted to the remote

possibility of encountering archaeological resources within the project parcel. If archaeological resources are encountered, work in the area of the find should be halted and a professional archaeologist consulted. Impacts to archaeological resources are considered less than significant.

- 4b. Affect a historic structure or site designated or eligible for designation as a National, State or City landmark?

The project site is currently developed with a hotel that was constructed approximately 50 years ago, with additions being made through the 1960s. The structures on the site are not considered to have historic merit. No impacts to historic structures or sites would occur as a result of the proposed project.

- 4c. Have the potential to cause a physical change which would affect ethnic cultural values or restrict religious uses in the project area?

There is no evidence that the site involves any ethnic or religious use or importance. The project would have no impact on historic, ethnic, or religious resources.

Required Mitigation Measures

No mitigation is required.

Recommended Mitigation Measure

The following mitigation measure should be implemented:

- CR-1: Unanticipated Archaeological Resources Contractor Notification.** Prior to the start of any vegetation or paving removal, demolition, trenching or grading, contractors and construction personnel shall be alerted to the possibility of uncovering unanticipated subsurface archaeological features or artifacts associated with past human occupation of the parcel. If such archaeological resources are encountered or suspected, work shall be halted immediately, the City Environmental Analyst shall be notified, and an archaeologist from the most current City Qualified Archaeologists List shall be retained by the applicant. The latter shall be employed to assess the nature, extent, and significance of any discoveries and to develop appropriate management recommendations for archaeological resource treatment, which may include, but are not limited to, redirection of grading and/or excavation activities, consultation and/or monitoring with a Barbareño Chumash representative from the most current City-qualified Barbareño Chumash Site Monitors List, etc.

If the discovery consists of possible human remains, the Santa Barbara County Coroner shall be contacted immediately. If the coroner determines that the remains are Native American, the coroner shall contact the California Native American Heritage Commission. A Barbareño Chumash representative from the most current City-qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.

If the discovery consists of possible prehistoric or Native American artifacts or materials, a Barbareño Chumash representative from the most current City-qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.

Applicant's Alternative

Impacts

Could the project

4a. Disturb archaeological resources?

Same as proposed project.

4b. Affect a historic structure or site designated or eligible for designation as a National, State or City landmark?

Same as proposed project.

4c. Have the potential to cause a physical change which would affect ethnic cultural values or restrict religious uses in the project area?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No mitigation is required.

Recommended Mitigation Measure

Same as propose project. **Mitigation Measure CR-1** should be implemented.

11.2.5 Geophysical Conditions

Proposed Project

Impacts

Could the project result in or expose people to

- 5a. Seismicity: fault rupture?
- 5b. Seismicity: ground shaking or liquefaction?
- 5c. Seismicity: seiche or tsunami?

Fault Rupture: The City *Master Environmental Assessment* (MEA) identifies the project site as not located on or near a known fault or fault zone.⁵ The closest mapped fault is the Mission Ridge/Arroyo Parida fault, which is approximately 500 feet to the southeast. This fault is not considered to be active. The Santa Ynez fault is the closest mapped active fault, and is approximately 4.5 miles northwest of the project site. Because no known active or potentially active faults are located within or immediately adjacent to the subject site, potential impacts associated with fault rupture from proposed development would be less than significant.

Ground Shaking and Liquefaction: The project site is located in a seismically active area of southern California (Seismic Zone 4 per 2001 California Building Code).⁶ Significant ground shaking as a result of a local or regional earthquake is likely to occur during the life of the project. Ground shaking and liquefaction are considered potentially significant impacts. The City's MEA indicates that the project site is located in an area of anticipated low-damage level to one- to three-story structures and moderate-damage level larger structures from potential earthquake ground shaking.⁷ Future development would be required to comply with building code requirements that would minimize potential hazards associated with ground shaking. The site is considered to be minimally susceptible to liquefaction in the

⁵ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

⁶ California Building Code, Chapter 16, Figure 16-2.

⁷ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

event of a strong earthquake per the City's MEA.⁸ Further, the types of soils present (high percentage of silt and/or clay) are less prone to liquefaction than a more granular material would be. The *Soils Engineering Report* prepared for the site identifies a relatively low potential for liquefaction.⁹ Therefore, impacts from ground shaking or liquefaction would be less than significant.

Seiche or Tsunami: The project site is not located within the tsunami run-up zone as identified in the City's MEA.¹⁰ "Seiche" refers to seismic waves within an enclosed water body such as a lake, which is not applicable to the project site location. No impacts related to tsunami or seiche are anticipated.

5d. Landslides or mudslides?

5e. Subsidence of the land?

5f. Expansive soils?

Landslides: The project site topography is flat; therefore, no impacts associated with landslide hazards would occur.

Subsidence: The potential for subsidence on the site is considered low, and impacts are considered less than significant. Further, recommendations in the geotechnical report include over-excavation and replacement of soils such that any risk from subsidence would be substantially reduced.¹¹

Expansive Soils: The soils tests performed at the site indicated that the soil would be classified in the "medium" expansion category per CBC Table 18-I-B. Precautionary measures are proposed in the geotechnical report to reduce any potentially significant, mitigable impacts associated with expansive soils to a less than significant level.¹²

5g. Excessive grading or permanent changes in the topography?

Grading: Site preparation would include demolition of all existing site improvements, including a motel, restaurant, and three swimming pools. Removal of these features is likely to result in disturbed soils at

⁸ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

⁹ Earth Systems Pacific, *Soils Engineering Report, Sandman Hotel and Condominiums, 3714 State Street, Santa Barbara, California*, September 25, 2003.

¹⁰ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

¹¹ Earth Systems Pacific, *Soils Engineering Report, Sandman Hotel and Condominiums, 3714 State Street, Santa Barbara, California*, September 25, 2003.

¹² Ibid.

significant depths. For the proposed project, subsurface parking garages are proposed for both the hotel and residential condominiums; developing the parking garages would result in excavation up to 15 feet in depth, excluding foundation excavation. It is anticipated that excavation will total approximately 80,000 cubic yards of material. Although the project will require extensive excavation, it is to construct underground parking facilities for the project; therefore, the proposed grading would not result in a significant alteration of the natural landform or substantially change the existing topography of the site. Impacts associated with landform changes (grading) are considered less than significant.

Required Mitigation Measures

The following mitigation measure shall be implemented:

- G-1: Geotechnical Recommendations.** Site preparation and project construction related to soil conditions and seismic hazards shall be in accordance with the recommendations contained in the *Soils Engineering Report*, prepared by Earth Systems Pacific, dated September 25, 2003. Compliance shall be demonstrated on plans submitted for grading and building permits.

Applicant's Alternative

Impacts

Could the project result in or expose people to

- 5a. Seismicity: fault rupture?
- 5b. Seismicity: ground shaking or liquefaction?
- 5c. Seismicity: seiche or tsunami?
- 5d. Landslides or mudslides?
- 5e. Subsidence of the land?
- 5f. Expansive soils?

Same as proposed project.

- 5g. Excessive grading or permanent changes in the topography?

Grading: Site preparation would include demolition of all existing site improvements, including a motel, restaurant, and three swimming pools. Removal of these features is likely to result in disturbed soils at significant depths. For the applicant's alternative, a subsurface parking garage is proposed for the residential condominiums; developing the parking garage would result in excavation up to 15 feet in depth, excluding foundation excavation. It is anticipated that excavation will total approximately 60,000 cubic yards. Although the project will require extensive excavation, it is to construct underground parking facilities for the project; therefore, the proposed grading would not result in a significant alteration of the natural landform or substantially change the existing topography of the site. Impacts associated with landform changes (grading) are considered less than significant.

Required Mitigation Measures

Same as proposed project. **Mitigation Measure G-1** shall be implemented.

11.2.6 Hazards

Proposed Project

Impacts

Could the project involve

- 6a. A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation)?
- 6b. The creation of any health hazard or potential health hazards?
- 6c. Exposure of people to existing sources of potential health hazards?

No hazardous materials are known to exist on the site with the exception of asbestos used in the construction of the existing buildings. Abatement is proposed to occur in compliance with Santa Barbara Air Pollution Control District's rules and regulations during the first phases of construction. Impacts from asbestos exposure are anticipated to be less than significant.

The proposed project (hotel and residential condominiums) is not anticipated to create any new hazards. Hazardous material usage on the site would likely be limited to the storage and use of relatively small quantities of materials such as paint, oils, cleaners, and landscape maintenance materials. Any use of hazardous materials would be subject to all applicable state and local requirements for management and disposals of such materials. No impact from hazardous materials is anticipated.

6d. Increased fire hazard in areas with flammable brush, grass, or trees?

The project site is not located in a City-designated high fire hazard area. Existing vegetation would be relocated or replaced with building and limited ornamental landscaping. The project would be subject to fire department and City ordinance requirements for adequate access, structural design, and materials. Adherence to the standard requirements of the Uniform Fire Code with respect to building design would ensure that fire hazard impacts for the proposed project would be less than significant.

Required Mitigation Measures

No mitigation is required.

Applicant's Alternative

Impacts

Could the project involve

6a. A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation)?

6b. The creation of any health hazard or potential health hazards?

6c. Exposure of people to existing sources of potential health hazards?

Same as proposed project.

6d. Increased fire hazard in areas with flammable brush, grass, or trees?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No mitigation is required.

11.2.7 Noise

Proposed Project

Impacts

Could the project result in

- 7a. Increases in existing noise levels?
- 7b. Exposure of people to severe noise levels?

Long-Term Operational Noise

The project site is located in an area subject to average ambient noise levels from roadway noise of less than 60 A-weighted decibels (dB(A)) day/night average noise level L_{dn} , 60 to 65 dB(A) L_{dn} and 65 to 70 dB(A) L_{dn} , as shown on the City's MEA noise contour maps.¹³ A project noise study¹⁴ and a supplemental noise study¹⁵ to address construction-related impacts were prepared. As part of the noise study, existing noise levels were monitored at a number of points. This information was then used to model current and future expected noise levels for the proposed project. Measured and modeled noise levels indicate current noise levels at a range of 45 to 49 dB(A) L_{dn} at the northwest corner of the site to a high of 67.7 to 70 dB(A) L_{dn} along State Street. For hotels, normally acceptable noise levels are 70 dB(A) for exterior areas and 45 dB(A) for interior areas. For residential uses, normally acceptable noise levels are 60 dB(A) for exterior areas and 45 dB(A) for interior areas.

Interior Noise Levels – Standard construction practices are considered to reduce noise levels by 15 dB(A); therefore, interior areas of the hotel and residential units exposed to exterior noise levels above 60 dB(A) L_{dn} may not meet the 45 dB(A) L_{dn} standard. Therefore, interior noise level impacts are considered potentially significant and mitigable. The noise study prepared for the project includes noise attenuation features that would reduce interior noise levels to 45 dB(A) L_{dn} or less. With incorporation of these features (**Mitigation Measures N-1** and **N-2**), interior noise level impacts would be reduced to less than significant levels.

¹³ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

¹⁴ Rincon Consultants, *Noise Study for Revised Sandman Redevelopment Project – City of Santa Barbara*, June 15, 2005.

¹⁵ *Ibid.*, *Sandman Redevelopment Housing Project, "Supplemental Noise Study to Address Construction-Related Impacts,"* April 2006.

Exterior Noise Levels – The exterior noise level at the site is less than the 70 dB(A) L_{dn} standard for hotel uses, so no mitigation would be required. However, the five residential condominiums along State Street (Unit Type E) would be subject to exterior noise levels that exceed the City’s standard for outside residential uses. The design of these two-story condominiums would attenuate noise from State Street to approximately 45.5 dB(A) L_{dn} at the required outdoor living spaces for each unit. No additional exterior mitigation is required apart from the proposed building design. All other exterior living areas on the project site would be protected from noise levels above 60 dB(A) L_{dn} . Impacts associated with exterior noise levels are considered less than significant.

Temporary Construction Noise

Uses around the project site are primarily commercial, retail, and residential. Residential uses are considered noise sensitive. The closest residences are located approximately 50 feet from the project site’s northern perimeter. Noise from grading and construction equipment, truck traffic, and vibration would affect surrounding noise-sensitive uses during the construction period (approximately two years and five months [124 weeks] for the proposed project).

The applicant has prepared a construction phasing schedule to address project length, construction equipment, trucks, and personnel required for each stage of the development. Hazardous material abatement, building demolition, and site-clearing operations for the proposed project are anticipated to last 14 weeks (3.5 months). Temporary shoring and mass excavation, which have the greatest potential noise impacts, are anticipated to last 10 weeks (2.5 months). Underground parking construction is anticipated to last 30 weeks (7.5 months). The hotel and condominium construction is scheduled to be completed over a 70-week (1 year, 4.5 months) period.

For the proposed project, the supplemental noise study concluded that, at 50 feet from sensitive receptors, construction noise during the 124 weeks of construction will range between 60–85 dB(A) CNEL, and that for 12–13 weeks of the duration of construction the noise level will range from 81–85 dB(A) at 50 feet from the sensitive receptor.¹⁶ These conclusions from the supplemental noise study are based on assumptions that mechanical equipment other than vehicles and equipment that are operated by electricity obtained from an electricity utility company would not be used before 7:00 AM or after 7:00 PM Monday through Friday or before 8:00 AM or after 7:00 on Saturday, Sunday, and holidays. Temporary construction noise impacts are considered potentially significant, mitigable (see **Mitigation Measures N-6 through N-13**).

¹⁶ Rincon Consultants, *Sandman Redevelopment Housing Project*, “Supplemental Noise Study to Address Construction-Related Impacts,” April 2006.

Required Mitigation Measures

The following mitigation measures shall be implemented:

N-1: Sound Barrier. As part of the building plan submittal, either of the following shall be included to reduce noise levels to the easternmost residence adjacent to the parking garage driveway:

- a. The easternmost residence along State Street shall include a solid wall on its eastern side to act as a noise barrier between the driveway and interior living area of that unit; or
- b. The driveway slope shall not exceed 10 percent for at least one car length at the top of the ramp where cars may be waiting to exit to State Street; do not allow windows to directly face the driveway at this location on the first floor; and use dual-glazed window panes on any second-story windows that overlook the driveway.

N-2: Interior Noise Reduction:

- a. The walls, doors, and windows of units that face State Street shall be constructed to include sufficient noise attenuation to reduce interior levels to a CNEL of 45 dB(A). This would require, at a minimum, the use of double-paned windows on all floors for those windows that face State Street.
- b. Windows shall have a minimum Standard Transmission Class (STC) of 35 and be properly installed, weather-stripped, and insulated.
- c. Doors with a minimum STC of 35 shall be used for doorways facing State Street and shall be insulated in conformance with California Title 24 requirements.
- d. The exterior wall facing shall be stucco and/or shall be designed for a minimum STC of 45.
- e. Roof or attic vents facing State Street shall be baffled.
- f. Air conditioning or a mechanical ventilation system shall be installed in at least the five dwelling units fronting on State Street, as well as the two others outside the 60-dB noise corridor so that windows and doors may remain closed. Ventilation systems shall be installed and operable prior to Certificate of Occupancy.

N-3: Exterior Residential Areas. Usable residential exterior areas (patios, balconies, courtyards) shall be oriented away from State Street to the extent feasible, and preferably shielded from roadways by the structures themselves.

- N-4: Pavement.** The residential parking lot driveway shall be paved with a coating to reduce tire squeal. This coating would consist of granulate rubber made from used tires as its aggregate and urethane resin as its binder.
- N-5: Left Turns.** Prohibit left turns onto State Street from the residential parking lot to eliminate sudden car accelerations that could otherwise occur when making this turn.
- N-6: Construction Notice.** At least 30 days prior to commencement of construction, the contractor shall provide written notice to all property owners and building occupants within 450 feet of the project area that proposed construction activities could substantially affect outdoor or indoor living areas. The notice shall contain a description of the proposed project, a construction schedule including days and hours of construction, a description of noise-reduction measures, and the name and phone number of the Project Environmental Coordinator (PEC) who can answer questions and provide additional information or address problems that may arise associated with construction noise. A 24-hour construction hot line shall be provided. Any noise complaints received shall be documented, and, as appropriate, construction activities shall be modified to the extent feasible to address such complaints. Informational signs with the PEC's name and telephone number shall also be posted at the site and shall be easily viewed from adjacent public areas.
- N-7: Construction Hours.** Noise-generating construction activities (which may include preparation for construction work) shall be permitted weekdays between the hours of 8:00 AM and 5:00 PM, excluding holidays observed by the City as legal holidays: New Year's Day (January 1); Martin Luther King Jr.'s birthday (3rd Monday in January); President's Day (3rd Monday in February); Memorial Day (Last Monday in May); Independence Day (July 4); Labor Day (1st Monday in September); Thanksgiving Day (4th-Thursday in November); Day Following Thanksgiving Day (Friday following Thanksgiving); Christmas Day (December 25). When a holiday falls on a Saturday or Sunday, the preceding Friday or following Monday respectively shall be observed as a legal holiday. Occasional night work may be approved for the hours between 5:00 PM and 8:00 AM weekdays by the Chief of Building and Zoning (per Section 9.13.015 of the Municipal Code). In the event of such night work approval, the applicant shall provide written notice to all property owners and occupants within 450 feet of the project property boundary and the City Planning and Building Divisions at least 48 hours prior to commencement of night work. Night work shall not be permitted on weekends or holidays.

- N-8: Construction Equipment Sound Barrier.** Stationary construction equipment that generates noise that exceeds 50 dB(A) at the property boundaries shall be shielded with a barrier that meets a STC) rating of 25.
- N-9: Construction Equipment Sound Control.** All construction equipment powered by internal combustion engines shall be properly muffled and maintained. No internal combustion engine shall be operated on the site without a muffler. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers. Unnecessary idling of internal combustion engines shall be prohibited.
- N-10: Construction Noise Barrier.** Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters. Whenever feasible, electrical power shall be used to run air compressors and similar power tools.
- N-11: Window Replacement.** The applicant shall offer to have a minimum 4-millimeter-thick, double-paned glass installed in the first- and second-story windows of the residences that face the project site.
- N-12: Air Conditioning.** The applicant shall offer to install temporary air conditioning in those residential units adjacent to the project site that do not already have this feature to allow residents to keep their windows closed during construction activities.
- N-13: Construction Sound Barrier Wall.** Install a temporary construction sound barrier wall along the northern half of the western edge of the project site, the entire northern end of the site, and the ~~northern half~~ portion of the eastern edge of the project site abutting the San Remo condominium complex. The barrier should be made of sound-attenuating material (not landscaping). The noise barrier can be constructed from concrete, masonry, wood, metal, or other materials determined to be appropriate by the City. To effectively reduce sound transmission through the barrier, the material chosen must be rigid and sufficiently dense (at least 20 kilograms/square meter). All noise barrier material types are equally effective, acoustically, if they have this density. The barrier shall be of sufficient height to block direct line of sight to the first story of adjacent residential uses. It is estimated that a noise barrier of the prescribed density would reduce average noise levels to sensitive receptors by up to 5 dB if the barrier blocks direct line of sight, and an additional 1.5 dB for each meter of barrier height for those uses blocked from direct line of sight.

Applicant's Alternative

Impacts

Could the project result in

- 7a. Increases in existing noise levels?
- 7b. Exposure of people to severe noise levels?

Long-Term Operational Noise:

The project site is located in an area subject to average ambient noise levels from roadway noise of less than 60 dB(A) L_{dn} , 60 to 65 dB(A) L_{dn} and 65 to 70 dB(A) L_{dn} , as shown on the City's MEA noise contour maps.¹⁷ A noise study¹⁸ and a supplemental noise study¹⁹ were prepared for the proposed project to address operational and construction-related impacts. As part of the noise study, existing noise levels were monitored at a number of points. This information was then used to model current and future expected noise levels for the proposed project. Measured and modeled noise levels indicate current noise levels at a range of 45 to 49 dB(A) L_{dn} at the northwest corner of the site to a high of 67.7 to 70 dB(A) L_{dn} along State Street. For office uses, normally acceptable noise levels are 75 dB(A) for exterior areas and 50 dB(A) for interior areas. For residential uses, normally acceptable noise levels are 60 dB(A) for exterior areas and 45 dB(A) for interior areas.

Interior Noise Levels – Standard construction practices are considered to reduce noise levels by 15 dB(A); therefore, interior areas of the office units exposed to exterior noise levels above 65 dB(A) L_{dn} may not meet the 50 dB(A) L_{dn} standard, and interior areas of the residential unit exposed to exterior noise levels above 60 dB(A) L_{dn} may not meet the 45 dB(A) L_{dn} standard. Therefore, interior noise level impacts are considered potentially significant and mitigable. The noise study prepared for the project includes noise attenuation features that would reduce interior noise levels to 45 dB(A) L_{dn} or less. These noise attenuation features can be feasibly incorporated into the office building design to reduce noise levels. With incorporation of these features (**Mitigation Measure N-2**), interior noise level impacts would be reduced to less than significant levels.

¹⁷ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

¹⁸ Rincon Consultants, *Noise Study for Revised Sandman Redevelopment Project – City of Santa Barbara*, June 15, 2005.

¹⁹ *Ibid.*, *Sandman Redevelopment Housing Project*, "Supplemental Noise Study to Address Construction-Related Impacts," April 2006.

Exterior Noise Levels – The exterior noise level at the site is less than the 75 dB(A) L_{dn} standard for office uses, so no mitigation would be required. One residential condominium may be subject to exterior noise levels that exceed the City's 60 dB(A) standard for outside residential uses. However, given the location of the unit away from State Street and close to the 60 dB noise contour line, in addition to the proposed 6-foot tall wall located approximately 30 feet north of State Street, noise from State Street would be reduced to less than 60 dB(A) L_{dn} at the required outdoor living space for this unit. No additional exterior mitigation is required apart from the proposed wall. All other exterior living areas on the project site would be protected from noise levels above 60 dB(A) L_{dn} . Impacts associated with exterior noise levels are considered less than significant.

Temporary Construction Noise:

Uses around the project site are primarily commercial, retail, and residential. Residential uses are considered noise sensitive. The closest residences are located approximately 50 feet from the project site's northern perimeter. Noise from grading and construction equipment, truck traffic, and vibration would affect surrounding noise-sensitive uses during the construction period (approximately two years and five months [124 weeks] for the proposed project, and two years [104 weeks] for the applicant's alternative).

The applicant has prepared a construction phasing schedule to address project length, construction equipment, trucks, and personnel required for each stage of the development. Hazardous material abatement, building demolition, and site-clearing operations for the applicant's alternative are anticipated to last 14 weeks (3.5 months). Temporary shoring and mass excavation, which have the greatest potential noise impacts, are anticipated to last 8 weeks (2 months). Underground parking construction is anticipated to last 24 weeks (6 months). The office and condominiums construction is scheduled to be completed over a 58-week (1 year, 1.5 months) period.

For the applicant's alternative, impacts from construction noise would be similar to the proposed project, but would occur over shorter periods of time for the mass excavation, construction of the underground parking structure, and office and condominium construction phases (approximately five months less than the proposed project). As with the proposed project, temporary construction noise impacts associated with the applicant's alternative are considered potentially significant and mitigable (see **Mitigation Measures N-6** through **N-13**).

Required Mitigation Measures

The following mitigation measures shall be implemented:

N-3 through N-13 (as identified above for proposed project) and

N-14: Interior Noise Reduction for Residential Units adjacent to State Street:

- a. The walls, doors, and windows of residential units closest to State Street shall be constructed to include sufficient noise attenuation to reduce interior levels to a CNEL of 45 dB(A).
- b. Windows shall have a minimum Standard Transmission Class (STC) of 35 and be properly installed, weather-stripped, and insulated.
- c. Doors with a minimum STC of 35 shall be used for doorways facing State Street and shall be insulated in conformance with California Title 24 requirements.
- d. Roof or attic vents facing State Street shall be baffled.
- e. Air conditioning or a mechanical ventilation system shall be installed in the two dwelling units outside the 60 dB noise corridor so that windows and doors may remain closed. Ventilation systems shall be installed and operable prior to Certificate of Occupancy.

N-15: Interior Noise Reduction for Office Units Adjacent to State Street:

The walls, doors, and windows of office units adjacent to State Street shall be constructed to include sufficient noise attenuation to reduce interior levels to a CNEL of 50 dB(A).

11.2.8 Population and Housing

Proposed Project

Impacts

Could the project

- 8a. Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?

The project site is located in an existing developed urban area already served by urban infrastructure. No extensions of infrastructure or urban services would be necessary to serve the project site. The proposed residential units are intended to meet existing demand for ownership housing units within the

community and would not induce growth. Growth inducing impacts as a result of the project would be less than significant.

8b. Displace existing housing, especially affordable housing?

Under the project, one residential unit would be removed (duplex at 3715 San Remo Drive would be converted to a single-family residence to allow for vehicular access to the Town & Country Apartments [3730 State Street]). While this would result in the loss of one residential unit, the project would provide 73 new housing units for the City, 11 of which would be designated as middle-income affordable housing units. No adverse housing impact would result from the project.

Required Mitigation Measures

No mitigation is required.

Applicant's Alternative

Impacts

Could the project

8a. Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?

Same as proposed project.

8b. Displace existing housing, especially affordable housing?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No mitigation is required.

11.2.9 Public Services

Proposed Project

Impacts

Could the project have an effect upon, or result in a need for new or altered services in, any of the following areas?

- 9a. Fire protection?
- 9b. Police protection?
- 9d. Maintenance of public facilities, including roads?
- 9e. Other governmental services?
- 9f. Electrical power or natural gas?
- 9g. Water treatment or distribution facilities?

The project site is located in an urban area where all public services are available. In 2005, the City prepared a *General Plan Update: 2030 Conditions, Trends, and Issues (CTI) Report*,²⁰ which examined existing conditions associated with fire protection, police protection, library services, public facilities, governmental facilities, electrical power, and natural gas. The *CTI Report* specifically analyzed whether there were deficiencies existing or anticipated for each of the public services. The *CTI Report* determined that police and fire protection services, and library services are being provided at acceptable levels to the City. In addition, the *CTI Report* determined that electricity, natural gas, telephone, and cable telecommunication services are being provided at acceptable service levels, and utility companies did not identify any deficiencies in providing service in the future. Finally, the *CTI Report* determined that demand for City buildings and facilities will continue to be impacted by growth, although no appropriate/acceptable levels of service have been established.

The project site is located in an urban area and involves the demolition of existing buildings and construction of new buildings in its place. Because the existing buildings already utilize existing public services, the project would be served with connections to existing public services for gas, electricity, cable, and telephone traversing the site, as well as access to existing roads. The project is not anticipated to create a substantially different demand on fire or police protection services, library services, or City

²⁰ City of Santa Barbara, *General Plan Update: 2030 Conditions, Trends, and Issues Report*, September 2005.

buildings and facilities than that anticipated in the *CTI Report*. Therefore, impacts from both the proposed project and the applicant's alternative to fire protection, police protection, library services, City buildings and facilities, electrical power, natural gas, telephone, and cable telecommunication services are anticipated to be less than significant.

9c. Schools?

The project site is served by the Santa Barbara Elementary and High School Districts. The proposed project would provide an increase of 73 residential units, which could generate additional students.

The project may also result in a minor increase in area employees (for the commercial portion of the project). It would be expected that some of the added employees would already reside in the area. Some portion of new employees may in-migrate. The commercial portion of the project may generate new elementary and secondary students to the extent that new employment created by the project results in new residents to the area. Unlike the residential portion of the project, which is located in a defined school attendance area, students generated by the commercial portion could live and attend a school in any area of the South Coast. Some students generated by the commercial portion could also live outside the boundaries of the Santa Barbara School Districts or attend private schools.

None of the school districts in the South Coast have been designated "overcrowded," as defined by California state law. School impact fees would be applied to the project in accordance with state law. Project impacts to schools would be less than significant.

9h. Sewer or septic tanks?

9i. Water distribution/demand?

Water

The City of Santa Barbara's water supply comes from the following sources, with the actual share of each determined by availability and level of customer demand: Cachuma Reservoir and Tecolote Tunnel, Gibraltar Reservoir and Mission Tunnel, 300 acre-feet per year (afy) of contractual transfer from Montecito Water District, groundwater, State Water Project entitlement, desalination, and recycled water. Conservation and efficiency improvements are projected to contribute to the supply by displacing demand that would otherwise have to be supplied by additional sources. In 1994, based on the comprehensive review of the City's water supply in the *Long Term Water Supply Alternatives Analysis*

(LTWSAA), the City Council approved the Long Term Water Supply Program (LTWSP).²¹ The LTWSP outlines a strategy to use the above sources to meet the projected demand of 17,900 afy (including 1,500 afy of demand projected to be met with conservation) plus a 10 percent safety margin for a total of 19,700 afy. Therefore, the target for the amount of water the system will actually have to supply, including the safety margin, is 18,200 afy. The *2003 Water Supply Management Report* documents an actual system demand of 13,460 afy and a theoretical commitment of 16,170 afy. Of the total system production, 95 percent was potable water and 5 percent was reclaimed water.²²

In 2005, the City prepared a *General Plan Update: 2030 Conditions, Trends, and Issues Report*,²³ which examined existing conditions associated with water supply, treatment, and distribution system, and specifically analyzed and determined that there were no existing or anticipated deficiencies for the next 20-year planning period based on a growth rate of 7 percent per year.

The project site receives water service from the City of Santa Barbara and is within the anticipated growth rate for the City. Therefore, the City's long-term water supply and existing water treatment and distribution facilities would adequately serve the proposed project.

The proposed project's net water demand is estimated at 19.53 afy. This increase in water use would result in a less than significant impact to the City's water supply and distribution facilities.

Sewer

The maximum capacity of the El Estero Treatment Plant is 11 million gallons per day (MGD), with current average daily flow of 8.5 MGD. The treatment plant is designed to treat the wastewater from a population of 104,000. The proposed project's estimated net new sewer demand is 15,127 gallons per day (gpd) or 16.94 afy. The potential increased sewage treatment associated with the proposed project can be accommodated by the existing City sewer system and sewage treatment plant, and would represent a less than significant impact.

9j. Solid waste disposal?

Most of the waste generated in the City is transported on a daily basis to seven landfills located around the County. The County of Santa Barbara, which operates the landfills, has developed impact significance

²¹ City of Santa Barbara, Long-Term Water Supply Program, prepared by the Water Resources Division, Public Works Department, July 5, 1994.

²² Ibid., *Water Supply Management Report*, prepared by the Water Resources Division, Public Works Department, 2003.

²³ City of Santa Barbara, *General Plan Update: 2030 Conditions, Trends, and Issues Report*, September 2005.

thresholds related to the impacts of development on remaining landfill capacity. The County thresholds are based on the projected average solid waste generation for Santa Barbara County from 1990 to 2005. The County assumes a 1.2 percent annual increase (approximately 4,000 tons per year) in solid waste generation over the 15-year period.

The County's threshold for project specific impacts to the solid waste system is 196 tons per year (this figure represents 5 percent of the expected average annual increase in solid waste generation [4,000 tons per year]). Source reduction, recycling, and composting can reduce a project's waste stream by as much as 50 percent. If a proposed project generates 196 or more tons per year after reduction and recycling efforts, impacts would be considered significant and unavoidable.

Proposed projects with a project-specific impact as identified above (196 tons per year or more) would also be considered cumulatively significant, as the project-specific threshold of significance is based on a cumulative growth scenario. However, as landfill space is already extremely limited, any increase in solid waste of 1 percent or more of the expected average annual increase in solid waste generation (4000 tons per year), which equates to 40 tons per year, is considered an adverse cumulative impact.

Long-Term (Operational)

The proposed project use is estimated to generate 268.58 tons per year of solid waste as follows:

Attached Residential: 2.65 people/unit x 73 units x 0.95 tons/year =	183.78 tons/year
Hotel/Motel: 106 rooms x 0.80 (tons/year) =	<u>84.80 tons/year</u>
Total:	268.58 tons/year

The existing use is estimated to generate 90.4 tons per year of solid waste. Therefore, the net solid waste generation of the project would be 178.18 tons per year (tpy) for the proposed project. With application of source reduction, reuse, and recycling, landfill disposal of solid waste could be reduced by 50 percent, to 89.09 tpy. The proposed project's project-specific impact is considered less than significant because the 196-ton-per-year threshold is not exceeded; however, an adverse cumulative impact would result from either because waste generation would exceed 40 tons per year.

The County of Santa Barbara is working on an update to their waste generation rates and thresholds; however, it has not yet been adopted. The draft updated waste generation numbers reflect the increase in residential trash generation over the last decade. However, a numeric threshold of significance is not identified with the updated generation rates. Because all measures that could feasibly be applied to projects are currently required by state law and City ordinance, recycling programs are available and

required throughout the City, and the County has met and is exceeding its state mandated waste diversion requirements. Operational solid waste generation from new discretionary development is considered to result in an adverse, but less than significant, solid waste impact on County-operated facilities.

Short-Term (Demolition and Construction)

Project demolition and excavation will require export of non-structural fill. The solid waste generation/disposal thresholds adopted by the City do not apply to short-term construction projects. However, new construction, especially remodeling and demolition, represents the greatest challenge to maintaining existing diversion rates. Solid waste generation guidelines have been developed by the County of Santa Barbara;²⁴ however, it should be noted that these numbers have not been adopted by the City.

Based on these guidelines, it is anticipated that the proposed project would generate 4,121 tons of waste for demolition and construction (2,640 tons of demolition waste plus 1,481 tons of construction waste).

Under the County's draft significance thresholds, any project that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on solid waste generation. Therefore, under these draft thresholds of significance, the proposed project would be considered to have a potentially significant, mitigable impact based on its construction-related solid waste generation. Although this threshold has not been formally adopted by the City, the amount of trash anticipated to be generated by the project warrants mitigation. The implementation of a solid waste management plan that includes measures to reduce, reuse, and recycle construction and demolition waste to the extent feasible would reduce short-term waste disposal impacts to less than significant.

Required Mitigation Measures

The following mitigation measures shall be implemented:

PS-1: Operational Recycling. Hotel and restaurant operators shall encourage guests to recycle by using recyclable materials and providing sufficient and appropriate receptacles, such as recycling or green waste containers, in each room. Recyclable material collection and pick-up areas shall be provided on site for the hotel and restaurant operations. The hotel and restaurant operators shall use materials that are recyclable to the extent feasible.

²⁴ County of Santa Barbara, *Environmental Thresholds and Guidelines Manual*, Chapter 17, "Solid Waste Thresholds," as revised and adopted by the Board of Supervisors September 23, 2008.

PS-2: Trash Enclosure Provision and Design. A trash enclosure with adequate area for recycling containers shall be provided on each property and screened from view from surrounding properties and the street. Dumpsters and containers with a capacity of 1.5 cubic yards or more shall not be placed within 5 feet of combustible walls, openings, or roofs unless protected with fire sprinklers. Project trash container areas shall incorporate approved long-term structural storm water best management practices (BMPs) to protect water quality. The applicant shall submit project plans to the satisfaction of Public Works Engineering and Solid Waste Department that incorporate long-term structural BMPs for trash storage areas to protect storm water quality. The owners shall maintain these structural storm water quality protections in working order for the life of the project, and shall inspect them at least annually and report to the City annually.

PS-3: Waste Management Plan. The applicant shall develop and implement a solid waste management plan to reduce waste generated by construction and demolition activities. Consistent with City of Santa Barbara ordinances, and in order to achieve the waste diversion goals required by state law, the contractor may choose to separate waste and recyclables on site or use a combination of source separation and a construction and demolition (C&D) sorting facility. The solid waste management plan shall include the following:

1. Contact information: The name and contact information of who will be responsible for implementing the solid waste management plan.
2. Waste assessment: A brief description of the proposed project wastes to be generated, including types and estimated quantities during the construction phase of this project. A minimum of 90 percent of demolition and construction materials shall be recycled or reused.
3. Recycling and waste collection areas: Waste sorting and/or collection and/or recycling areas shall be clearly indicated on the project plans and approved by the City Solid Waste Specialist.
4. Transportation: A description of the means of transportation of recyclable materials and waste (whether materials will be site-separated and self-hauled to designated centers, or whether mixed materials will be collected by a waste hauler and removed from the site to be processed) and destination of materials.
5. Landfill information: The name of the landfill(s) where trash will be disposed of and a projected amount of material that will be landfilled.

6. Meetings: A description of meetings to be held between applicant and contractor to ensure compliance with the site solid waste management plan.
7. Alternatives to landfilling: A list of each material proposed to be salvaged, reused, or recycled during the course of the project.
8. Contingency Plan: An alternate location to recycle and/or stockpile C&D in the event of local recycling facilities becoming unable to accept material (for example: all local recycling facilities reaching the maximum tons per day due to a time period of unusually large volume).
9. Implementation and documentation of solid waste management plan:
 - a. Manager: The permit applicant or contractor shall designate an on-site party (or parties) responsible for instructing workers and overseeing and documenting results of the solid waste management plan for the project site foreman. The contact will notify the Public Works Department immediately should any deviance from the solid waste management plan be necessary.
 - b. Distribution: The contractor shall distribute copies of the solid waste management Plan to the job site foremen, impacted subcontractors, and the architect.
 - c. Instruction: The permit applicant or contractor shall provide on-site instruction of appropriate separation, handling, and recycling, salvage, reuse, and return methods to be used by all parties at the appropriate stages of project development.
 - d. Separation and/or collection areas: The permit applicant or contractor shall ensure that the approved recycling and waste collection areas are designated on site.
 - e. Construction of recycling and waste container facilities: Inspection shall be made by Public Works to ensure the appropriate storage facilities are created in accordance with AB 2176, California State Public Resources Code 42911 and City of Santa Barbara Zoning Ordinances.
 - f. Hazardous wastes: Hazardous wastes shall be separated, stored, and disposed of according to federal, state, and local regulations.
 - g. Documentation: The contractor shall submit evidence at each inspection to show that recycling and/or reuse goals are being met and a summary of waste generated by the project shall be submitted on a monthly basis. Failure to submit this information shall be grounds for a stop work order. The summary shall be submitted on a form acceptable to the Public Works Department and shall contain the following information:

- Disposal information: amount (in tons or cubic yards) of material landfilled; identity of the landfill; total amount of tipping fees paid at the landfill; weight tickets, manifests, receipts, and invoices (attach copies).
 - Recycling information: amount and type of material (in tons or cubic yards); receiving party; manifests, weight tickets, receipts, and invoices (attach copies).
 - Reuse and salvage information: list of items salvaged for reuse on project or campus (if any); amount (in tons or cubic yards); receiving party or storage location.
- h. Contingency Plan: The permit applicant or contractor shall detail the location and recycling of stockpiled material in the event of the implementation of a contingency plan.

Applicant's Alternative

Impacts

Could the project have an effect upon, or result in a need for new or altered services in, any of the following areas?

- 9a. Fire protection?
- 9b. Police protection?
- 9d. Maintenance of public facilities, including roads?
- 9e. Other governmental services?
- 9f. Electrical power or natural gas?
- 9g. Water treatment or distribution facilities?

Same as proposed project.

- 9c. Schools?

Same as proposed project.

- 9h. Sewer or septic tanks?
- 9i. Water distribution/demand?

Water

Similar to proposed project; however, the applicant's alternative's net water demand is estimated at 7.44 afy (compared to 19.53 afy for the proposed project). This increase in water use would result in a less than significant impact to the City's water supply and distribution facilities.

Sewer

Similar to proposed project; however the applicant's alternative's net sewer demand would be 5,922 gpd or 6.63 afy (compared to 16.94 afy for the proposed project). The potential increased sewage treatment associated with the applicant's alternative can be accommodated by the existing City sewer system and sewage treatment plant, and would represent a less than significant impact.

9j. Solid waste disposal?

Same as proposed project.

Long-Term (Operational)

The applicant's alternative use is estimated to generate 195.46 tons per year of solid waste as follows:

Attached Residential: 2.65 people/unit x 73 units x 0.95 tons/year =	183.78 tons/year
Office: 14,600 square feet x 0.0013tons/year. =	<u>18.98 tons/year</u>
Total:	202.76 tons/year

The existing use is estimated to generate 90.4 tons per year of solid waste. Therefore, the net solid waste generation of the project would be 112.36 tpy for the applicant's alternative. With application of source reduction, reuse, and recycling, landfill disposal of solid waste could be reduced by 50 percent, to 56.18 tpy (compared to 89.09 tpy for the proposed project). The applicant's alternative's project-specific impact is considered less than significant because the 196-ton-per-year threshold is not exceeded; however, an adverse cumulative impact would result from either because waste generation would exceed 40 tons per year.

Short-Term (Demolition and Construction)

Project demolition and excavation will require export of non-structural fill. The solid waste generation/disposal thresholds adopted by the City do not apply to short-term construction projects. However, new construction, especially remodeling and demolition, represents the greatest challenge to maintaining existing diversion rates. Solid waste generation guidelines have been developed by the

County of Santa Barbara; however, it should be noted that these numbers have not been adopted by the City.

Based on these guidelines, it is anticipated that the applicant's alternative would generate 2,640 tons of waste for demolition (same as proposed project); however, it would only generate approximately 1,000 tons of construction waste for a total of 3,640 tons.

Under the County's draft significance thresholds, any project that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on solid waste generation. Therefore, under these draft thresholds of significance, the applicant's alternative would be considered to have a potentially significant, mitigable impact based on its construction-related solid waste generation. Although this threshold has not been formally adopted by the City, the amount of trash anticipated to be generated by the project warrants mitigation. The implementation of a solid waste management plan that includes measures to reduce, reuse, and recycle construction and demolition waste to the extent feasible would reduce short-term waste disposal impacts to less than significant.

Required Mitigation Measures

Similar to proposed project. **Mitigation Measures PS-2** and **PS-3** shall be implemented.

11.2.10 Recreation

Proposed Project

Impacts

Could the project

10a. Increase the demand for neighborhood or regional parks or other recreational facilities?

Currently, within the City there are more than 1,800 acres of natural open space, park land, and other recreational facilities. In addition, there are 28 tennis courts, 2 public outdoor swimming pools, beach volleyball courts, sport fields, lawn bowling greens, a golf course, 13 community buildings, and a major skateboard facility. The City also offers a wide variety of recreational programs for people of all ages and abilities in sports, various classes, tennis, aquatics, and cultural arts.

In 2005, the City prepared a *General Plan Update: 2030 Conditions, Trends, and Issues (CTI) Report*, which examined existing conditions associated with recreation and parks.²⁵ Population characteristics including

²⁵ City of Santa Barbara, *General Plan Update: 2030 Conditions, Trends, and Issues Report*, September 2005.

income, age, population growth, education, and ethnicity affect recreation interests and participation levels.

The National Recreation and Park Association (NRPA) has established park service area standards for various types of parks. The NRPA standards have not been adopted by the City; however, the standards do provide a useful tool for assessing park space needs. The *CTI Report* determined that, based on NRPA standards, there is an uneven distribution of parkland in the City, such that some areas of the City may currently be underserved with neighborhood and community parks, but overall the City has adequate passive, community, beach, regional, open space, and sports facility parks.

The development of the proposed project with new residences and a hotel, or the applicant's alternative with new residences and offices, would create an increase in the demand for park and recreational opportunities in the general area. As indicated above, the City of Santa Barbara has ample parkland, albeit unevenly distributed, throughout the City and adequate recreation facilities. Both the proposed project and applicant's alternative would introduce additional residents into the North State neighborhood, where existing nearby neighborhood parks (those intended to serve nearby residents) include MacKenzie Park, Stevens Park, Willowglen Park, and Los Robles Park. None of the above referenced neighborhood parks are within the NRPA 0.25- to 0.5-mile radius standard of the proposed project site. Residents of the residential condominiums (of either the proposed project or the applicant's alternative) would have access to these neighborhood parks, although somewhat less conveniently than if located within the NRPA standard distance. In addition, residents would have access to other community, beach, regional, open space and sports facility parks, plus all City recreation programs.

Because of the transient nature of hotel guests, their park and recreation needs differ from that of residents. Often, on-site recreational opportunities are provided that are tailored to hotel guest needs (i.e., swimming pool, kids' game room, etc.). In addition, hotel guests often seek more tourist-oriented attractions and destinations, and, overall, their use of neighborhood and community parks is limited. Employees of the offices would not require recreational areas.

The increase in park and recreational demands associated with the residences, hotel guests, and office employees is considered a less than significant impact.

10b. Affect existing parks or other public recreational facilities?

As described above, the project site is not within close proximity of either neighborhood or community parks. The project is located across State Street from a path along San Roque Creek, and within a block of the YMCA facility. However, the proposed residential condominium, hotel, and commercial office land uses by their nature, would not interfere or cause a substantial loss of use of existing parks or recreational

facilities by means of obnoxious or offensive emission of odors, dust, gas, fumes, smoke, liquids, wastes, noise, vibrations, or disturbances. Therefore, the project would have a less than significant impact on recreational facilities.

Required Mitigation Measures

No mitigation is required.

Proposed Project

Impacts

Could the project

10a. Increase the demand for neighborhood or regional parks or other recreational facilities?

Same as proposed project; however, office use would replace the hotel use, thereby slightly changing the demand for park facilities (office employee use versus hotel employee and guest use).

10b. Affect existing parks or other public recreational facilities?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No mitigation is required.

11.2.11 Transportation and Circulation

Proposed Project

Impacts

Could the project result in

11c. Inadequate emergency access or access to nearby uses?

The fire department has reviewed the site plan for the proposed project and has indicated that emergency vehicle maneuvering areas are adequate and access/distance from fire-fighting equipment to the proposed structures meets standards. Emergency access impacts of the project would be less than significant.

11e. Hazards or barriers for pedestrians or bicyclists?

The project proposes to widen the sidewalk from approximately 4 feet in width to 8 feet in width with a 4-foot-wide parkway adjacent to State Street. This would increase pedestrian circulation opportunities and improve the pedestrian environment along the State Street corridor. Impacts associated with sidewalk improvements are considered less than significant.

Required Mitigation Measures

No additional mitigation is required.

Applicant's Alternative

Impacts

Could the project result in

11c. Inadequate emergency access or access to nearby uses?

Same as proposed project.

11e. Hazards or barriers for pedestrians or bicyclists?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No additional mitigation is required.

11.2.12 Water Environment

Proposed Project

Impacts

Could the project result in

12a. Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?

12c. Discharge into surface waters?

12e. Increased storm water drainage?

Drainage: Drainage from the site sheet flows in a southerly direction down the existing driveway to State Street, at which point it flows in a westerly direction via curb and gutter towards drainage inlets that eventually convey runoff to Arroyo Burro Creek. The *Preliminary Drainage Analysis* indicates that runoff from the site in a 25-year storm event would increase by 0.90 cubic feet per second following construction of the project. An underground collection system is proposed to reduce the increase in peak flow, and corresponding overall drainage volume, to pre-project levels.²⁶ Thus, there would be no net increase of runoff and impacts would be less than significant.

Surface Water Quality: Project demolition and grading activities create the potential for erosion and sedimentation to affect water quality. Surface water quality impacts are, therefore, considered potentially significant and mitigable through implementation of erosion-control measures. Numerous federal, state, and local regulatory programs have been established to minimize impacts to water quality resulting from construction operations. Compliance with applicable regulations and the mitigation requirements provided below will reduce the potential for the proposed project to result in short-term construction-related water quality impact to a less than significant level.

Runoff of pollutants from parking areas or commercial operations could also degrade water quality. Project drainage will be designed to flow south toward State Street, as it currently flows. Storm flows that are directed to the underground garage areas will be pumped via a lift station up to grade. Outflow from the detention facility will be discharged via gravity flow to an existing subsurface storm drain conduit under State Street. Compliance with standard City requirements would reduce the project's potentially significant, mitigable long-term water quality impacts to a less than significant level. These requirements include the preparation of an operation and maintenance plan for the use of storm drain surface water pollutant interceptors, stenciling of storm drain warnings of the direct connection of the drainage system to creeks and the ocean, and implementation of water quality protection BMPs.

12b. Exposure of people or property to water related hazards such as flooding?

The project site is not within a flood hazard area as shown on the Federal Insurance Rate Map published by Federal Emergency Management Agency (FEMA). No impacts are anticipated related to flooding.

12d. Change in the quantity, quality, direction or rate of flow of ground waters?

²⁶ Flowers & Associates, Inc., *Preliminary Drainage Analysis, Sandman Inn Redevelopment and Condominium Project*, April 20, 2005 – revised April 27, 2006.

The groundwater table on site was measured at 22 to 26 feet below the surface in 2003. On-site grading is not anticipated to reach the level of the groundwater table; therefore, direct contact with groundwater is not anticipated to occur. Therefore, no impacts to groundwater are expected.

Required Mitigation Measures

The following mitigation measures shall be implemented:

W-1: Construction Erosion/Sedimentation Control Plan. Project grading and construction shall be conducted in accordance with an approved erosion control plan to protect water quality throughout the duration of site preparation, earthwork, and construction process. Prior to the issuance of a demolition or building permit for the proposed project, the applicant or project developer shall prepare an erosion control plan that is consistent with the requirements outlined in the *Procedures for the Control of Runoff into Storm Drains and Watercourses* and the Building and Safety Division *Erosion/Sedimentation Control Policy* (2003). The erosion control/water quality protection plan shall specify how the required water quality protection procedures are to be designed, implemented, and maintained over the duration of the development project. A copy of the plan shall be submitted to the Community Development and Public Works Departments for review and approval, and a copy of the approved plan shall be kept at the project site.

At a minimum, the erosion control/water quality protection plan prepared for the proposed project shall address the implementation, installation, and/or maintenance of each of the following water resource protection strategies: paving and grinding, sandbag barriers, spill prevention/control, solid waste management, storm drain inlet protection, stabilize site entrances and exits, illicit connections and illegal discharges, water conservation, stockpile management, liquid wastes, street sweeping and vacuuming, concrete waste management, sanitary/septic waste management, vehicle and equipment maintenance, vehicle and equipment cleaning, and vehicle and equipment fueling.

W-2: Minimization of Storm Water Pollutants of Concern. The applicant shall implement approved plans incorporating long-term storm water best management practices (BMPs) to minimize identified storm water pollutants of concern including automobile oil, grease and metals. The applicant shall submit project plans incorporating long-term BMPs to minimize storm water pollutants of concern to the extent feasible, and obtain approval from Public Works Engineering. The owners association shall maintain approved

facilities in working order for the life of the project, and shall inspect annually and submit report to City annually.

W-3: Storm Drain System Stenciling and Signage. Within the project area, the applicant shall implement stenciling of all storm drain inlets and catch basins, and posting of signs at all public access points along channels and creeks, with language in English and Spanish and graphic icons prohibiting dumping, per approved plans. The applicant shall submit project plans to the satisfaction of Public Works Engineering that identify storm drain inlet locations throughout the project area, and specified wording and design treatment for stenciling of storm drain inlets and signage for public access points that prohibit dumping. The owners association shall maintain ongoing legibility of the stenciling and signage for the life of the project, and shall inspect at least annually and submit report annually.

Applicant's Alternative

Impacts

Could the project result in

- 12a. Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?
- 12c. Discharge into surface waters?
- 12e. Increased storm water drainage?

Drainage: Drainage from the site sheet flows in a southerly direction down the existing driveway to State Street, at which point it flows in a westerly direction via curb and gutter towards drainage inlets that eventually convey runoff to Arroyo Burro Creek. The *Preliminary Drainage Analysis* indicates that runoff from the site in a 25-year storm event would increase by 0.90 cubic feet per second following construction of the proposed project. While a similar analysis has not been prepared for the applicant's alternative, permeable surface area would be greater in that additional turf area is available along the front of the site facing State Street and runoff would be proportionally reduced. An underground collection system is proposed to reduce the increase in peak flow, and corresponding overall drainage volume, to pre-project levels.²⁷ Thus, there would be no net increase of runoff and impacts would be less than significant.

Surface Water Quality: Same as proposed project.

- 12b. Exposure of people or property to water related hazards such as flooding?

²⁷ Flowers & Associates, Inc., *Preliminary Drainage Analysis, Sandman Inn Redevelopment and Condominium Project*, April 20, 2005 – revised April 27, 2006.

Same as proposed project.

12d. Change in the quantity, quality, direction or rate of flow of ground waters?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. **Mitigation Measures W-1** through **W-3** shall be implemented.

11.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

11.1 INTRODUCTION

This section is based on the Initial Study and Notice of Preparation (IS/NOP), dated May 22, 2008, and contained in **Appendix 2.0** of this environmental impact report (EIR). The IS/NOP was prepared to identify the potentially significant effects of the proposed project; it was circulated for public review between May 27 and June 25, 2008.

In the course of this evaluation, certain impacts were found to be less than significant because the proposed project's characteristics would not create such impacts. The effects determined not to be significant are not required to be included in primary analysis sections of the draft EIR. In accordance with *California Environmental Quality Act (CEQA) Guidelines* Section 15128, this section provides a brief description of effects found not to be significant or less than significant based on the IS/NOP comments or more detailed analysis conducted as part of the EIR preparation process. Note that a number of impacts that are found to be less than significant are addressed in the various EIR topical sections (**Sections 6.0 through 8.0**) to provide a more comprehensive discussion of why impacts are less than significant, in order to better inform decision makers and the general public.

11.2 EFFECTS FOUND NOT TO BE SIGNIFICANT

The following issues were determined to be not significant. Issues are listed on the Initial Study checklist (see **Appendix 2.0**) and are numbered accordingly.

11.2.1 Aesthetics

Proposed Project

Impacts

Could the project

1c. Create light or glare?

The project is located in a commercial/residential area with the nearest residence located 50 feet from the project site. Existing night lighting in the area is generally in parking lots and for security purposes around buildings. A lighting plan has not been provided for the proposed project; however, lighting is anticipated for security purposes. Additionally, interior lighting of residences would be visible from off site. New exterior lighting would be required to comply with the requirements of the City's Outdoor

Lighting and Design Ordinance¹, which limits exterior lighting placement and height, and requires that lighting be hooded and directed so that it does not illuminate areas off site. Compliance with this ordinance, as enforced by Architectural Board of Review (ABR) review of the lighting plan, would ensure that exterior lighting does not result in a significant impact. Spillover of interior lighting would adversely increase lighting of the night sky in the area; however, this impact is considered less than significant.

Required Mitigation Measures

No additional mitigation is required.

Applicant's Alternative

Impacts

Could the project

1c. Create light or glare?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No additional mitigation is required.

11.2.2 Air Quality

Proposed Project

Impacts

Could the project

2a. Conflict with or obstruct implementation of the applicable air quality plan?

Direct and indirect emissions associated with the project are accounted for in the Clean Air Plan (CAP) emissions growth assumptions. Appropriate air quality mitigation measures, including construction dust suppression, would be applied to the project, consistent with CAP and City policies. The project could be found consistent with the CAP.

¹ City of Santa Barbara, Municipal Code, Section 22.75.

2b. Exceed any City air quality emission threshold? Long-term?

Substantial long-term project emissions could potentially stem from stationary sources, which may require the Santa Barbara County Air Pollution Control District (SBCAPCD) permits, from motor vehicles associated with the project, and mobile sources including the automobile. The proposed project does not contain any stationary sources (e.g., gas stations, auto body shops, dry cleaners, oil and gas production and processing facilities, and water treatment facilities) which require permits from SBCAPCD.

Utilizing the URBEMIS 9.2.4 computer model, it is estimated that the proposed project will generate 16.21 pounds per day of oxides of nitrogen (NO_x) and 16.58 pounds per day of reactive organic gases (ROG). Using the same model, it is estimated that the existing development generates 15.09 pounds per day of NO_x and 11.54 pounds per day of ROG. The proposed project would result in a net increase in NO_x of 1.12 pounds per day and a net increase in ROG of 5.04 pounds per day. Therefore, the proposed project is anticipated to have a less than significant impact on the environment related to long-term emissions.

2c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated in non-attainment under an applicable federal or state ambient air quality standard?

Since project impacts do not exceed the significance thresholds and the project is consistent with the CAP, project cumulative impacts would be less than significant.

2d. Expose sensitive receptors to substantial pollutants?

The proposed project would generate 1,535 average daily trips (ADTs) which is 216 ADTs less than are currently generated by the existing uses on the project site.² Additionally, the proposed project would generate less than 127 peak hour vehicle trips AM or PM peak hour. Therefore, the project would be unlikely to generate dangerous concentrations of carbon monoxide at any location. Additionally, the proposed project does not include stationary sources. However, sensitive receptors could be affected by dust and particulates during project site grading. As described above, impacts associated with dust and particulates are considered potentially significant, though mitigable through application of dust control mitigation measures. Therefore, the less than significant amounts of dust and particulates would result in a less than significant impact related to exposure of sensitive receptors to these pollutants. A detailed

² Associated Transportation Engineers, *Revised Trip Generation Analysis for the Sandman Inn Project*, November 13, 2007.

analysis of air quality impacts associated with construction of the proposed project is provided in **Section 6.0, Air Quality**, of this EIR.

2e. Create objectionable odors affecting a substantial number of people?

The proposed project would not contain features with the potential to emit substantial odorous emissions from sources such as commercial cooking equipment, combustion or evaporation of fuels, sewer systems, or solvents and surface coatings. Due to the nature of the proposed land use and limited size of the project, project impacts related to odors are considered less than significant.

Required Mitigation Measures

The mitigation measures (**Mitigation Measure AQ-1 to AQ-13**) provided in **Section 6.0, Air Quality**, shall be implemented.

Applicant's Alternative

Impacts

Could the project

2a. Conflict with or obstruct implementation of the applicable air quality plan?

Same as proposed project.

2b. Exceed any City air quality emission threshold? Long-term?

Substantial long-term project emissions could potentially stem from stationary sources, which may require the Santa Barbara County Air Pollution Control District (SBCAPCD) permits, from motor vehicles associated with the project, and mobile sources including the automobile. The proposed project does not contain any stationary sources (e.g., gas stations, auto body shops, dry cleaners, oil and gas production and processing facilities, and water treatment facilities) which require permits from SBCAPCD.

Again, using URBEMIS 9.2.4, it is estimated that the applicant's alternative will generate a maximum of 8.57 pounds per day of NOX and 10.01 pounds per day of ROC. Utilizing the same model, it is estimated that the existing development generates a maximum of 14.28 pounds per day of NOX and 12.66 pounds per day of ROC. The applicant's alternative would result in a net reduction in NOX of 5.71 pounds per day and a net reduction in ROC of 2.65 pounds per day. Therefore, the applicant's alternative is anticipated to have a less than significant impact on the environment related to long-term emissions.

- 2c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated in non-attainment under an applicable federal or state ambient air quality standard?

Same as proposed project.

- 2d. Expose sensitive receptors to substantial pollutants?

The applicant's alternative would generate 899 ADTs which is 852 ADTs less than are currently generated by the existing uses on the project site.³ Additionally, the applicant's alternative would generate less than 99 peak hour vehicle trips for either the AM or PM peak hour. Therefore, the project would be unlikely to generate dangerous concentrations of carbon monoxide at any location. Additionally, the applicant's alternative does not include stationary sources. However, sensitive receptors could be affected by dust and particulates during project site grading. As described above, impacts associated with dust and particulates are considered potentially significant, though mitigable through application of dust control mitigation measures. Therefore, the less than significant amounts of dust and particulates would result in a less than significant impact related to exposure of sensitive receptors to these pollutants. A detailed analysis of air quality impacts associated with construction of the applicant's alternative is provided in **Section 6.0, Air Quality**, of this EIR.

- 2e. Create objectionable odors affecting a substantial number of people?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. **Mitigation Measures AQ-1 to AQ-13** provided in **Section 6.0, Air Quality**, shall be implemented.

³ Associated Transportation Engineers, *Revised Trip Generation Analysis for the Sandman Inn Project*, November 13, 2007.

11.2.3 Biological Resources

Proposed Project

Impacts

Could the project

- 3a. Endangered threatened or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)?
- 3c. Natural communities (e.g., oak woodland, coastal habitat, etc.).
- 3d. Wetland habitat (e.g., marsh, riparian, and vernal pool)?
- 3e. Wildlife dispersal or migration corridors?

As recognized by the City of Santa Barbara *Master Environmental Assessment*, the project site is located in a portion of the City that is almost entirely urbanized, where biological resources are limited. Vegetation on the project site is characterized primarily by specimen non-native plant material, mainly sub-tropical plants such as palms, bird of paradise, yucca, and tupidanthus, as well as jacaranda, coral and one cedar tree. No endangered, threatened, or rare species or their habitats currently listed or identified as being candidates for state or federal protection are present at this site. The project site does not support any contiguous natural communities or function as an important wildlife movement or dispersal area. No wetlands exist on the project site. The proposed project would not result in any significant impacts to these resources, their habitats, or wildlife movement opportunities. Project impacts to biological resources would be less than significant.

The vegetation on site has limited habitat value for roosting and foraging by urban-adapted species, such as by birds and invertebrates. However, given the amount, height, and type of trees and vegetation currently existing on site—all of which are proposed to be removed as part of the project—there may be an adverse, but less than significant, impact on birds and invertebrates. A recommended mitigation measure is included to reduce possible disturbances to nesting species to further reduce this less than significant impact.

3b. Locally designated historic, Landmark or specimen trees?

Mature native and non-native specimen trees provide numerous benefits to the environment, including visual beauty, shade, soil stability, air quality, and localized habitat for urban-adapted wildlife species such as birds. City policies address the protection, maintenance, and replacement of mature trees, and require replacement on a minimum one-to-one basis when removed.

The project site includes approximately 205 mature trees and ornamental plants, according to the tree inventory prepared for the site.⁴ There are no City-designated specimen, historic, or landmark trees on the site. The majority of the trees on site are palm trees. All of the trees on site are proposed to be removed, although approximately 80 of the trees are proposed to be transplanted for reuse in the new development. The preliminary landscape plans for the proposed project (See **Figure 3.0-11**) include enhanced street tree planting and placement of trees in planters around the perimeter of the site. Skyline trees are proposed to screen adjacent commercial uses. The removal of existing skyline trees and vegetation is considered a less than significant impact related to biological resources.

Required Mitigation Measures

No mitigation is required.

Recommended Mitigation Measure

The following mitigation measure should be implemented:

BIO-1: Seasonal Restriction. Removal of trees during initial site development should be limited to the time period between September 1 and January 31. If tree removal or construction is to occur during the bird nesting season (February 1 through August 31), a City-approved biologist shall conduct a survey at the site for active nests two weeks prior to any scheduled tree removal, tree pruning, development, or grading. If active nests are located, setbacks for construction work would be required until the nest is no longer active or the young have fledged. If no active nests are found, the construction, tree removal, or grading restrictions specified in this section shall not apply.

⁴ Charlie Eckberg, *Tree Study/Inventory, Sandman Inn 3714 State Street, Santa Barbara*, prepared for Investec, December 1, 2006.

Applicant's Alternative

Impacts

Could the project

- 3a. Endangered threatened or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)?
- 3c. Natural communities (e.g., oak woodland, coastal habitat, etc.).
- 3d. Wetland habitat (e.g., marsh, riparian, and vernal pool)?
- 3e. Wildlife dispersal or migration corridors?

Same as proposed project.

- 3b. Locally designated historic, Landmark or specimen trees?

Same as proposed project (See **Figure 3.0-15**).

Required Mitigation Measures

Same as proposed project. No mitigation is required.

Recommended Mitigation Measures

Same as proposed project. **Mitigation Measure BIO-1** should be implemented.

11.2.4 Cultural Resources

Proposed Project

Impacts

Could the project

- 4a. Disturb archaeological resources?

The project site is not located within a prehistoric or historic cultural resources sensitivity area. However, as with any ground-disturbing activity, there is the remote possibility of encountering unknown buried deposits. For this reason, contractors and construction personnel should be alerted to the remote

possibility of encountering archaeological resources within the project parcel. If archaeological resources are encountered, work in the area of the find should be halted and a professional archaeologist consulted. Impacts to archaeological resources are considered less than significant.

4b. Affect a historic structure or site designated or eligible for designation as a National, State or City landmark?

The project site is currently developed with a hotel that was constructed approximately 50 years ago, with additions being made through the 1960s. The structures on the site are not considered to have historic merit. No impacts to historic structures or sites would occur as a result of the proposed project.

4c. Have the potential to cause a physical change which would affect ethnic cultural values or restrict religious uses in the project area?

There is no evidence that the site involves any ethnic or religious use or importance. The project would have no impact on historic, ethnic, or religious resources.

Required Mitigation Measures

No mitigation is required.

Recommended Mitigation Measure

The following mitigation measure should be implemented:

CR-1: Unanticipated Archaeological Resources Contractor Notification. Prior to the start of any vegetation or paving removal, demolition, trenching or grading, contractors and construction personnel shall be alerted to the possibility of uncovering unanticipated subsurface archaeological features or artifacts associated with past human occupation of the parcel. If such archaeological resources are encountered or suspected, work shall be halted immediately, the City Environmental Analyst shall be notified, and an archaeologist from the most current City Qualified Archaeologists List shall be retained by the applicant. The latter shall be employed to assess the nature, extent, and significance of any discoveries and to develop appropriate management recommendations for archaeological resource treatment, which may include, but are not limited to, redirection of grading and/or excavation activities, consultation and/or monitoring with a Barbareño Chumash representative from the most current City-qualified Barbareño Chumash Site Monitors List, etc.

If the discovery consists of possible human remains, the Santa Barbara County Coroner shall be contacted immediately. If the coroner determines that the remains are Native American, the coroner shall contact the California Native American Heritage Commission. A Barbareño Chumash representative from the most current City-qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.

If the discovery consists of possible prehistoric or Native American artifacts or materials, a Barbareño Chumash representative from the most current City-qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.

Applicant's Alternative

Impacts

Could the project

4a. Disturb archaeological resources?

Same as proposed project.

4b. Affect a historic structure or site designated or eligible for designation as a National, State or City landmark?

Same as proposed project.

4c. Have the potential to cause a physical change which would affect ethnic cultural values or restrict religious uses in the project area?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No mitigation is required.

Recommended Mitigation Measure

Same as propose project. **Mitigation Measure CR-1** should be implemented.

11.2.5 Geophysical Conditions

Proposed Project

Impacts

Could the project result in or expose people to

- 5a. Seismicity: fault rupture?
- 5b. Seismicity: ground shaking or liquefaction?
- 5c. Seismicity: seiche or tsunami?

Fault Rupture: The City *Master Environmental Assessment* (MEA) identifies the project site as not located on or near a known fault or fault zone.⁵ The closest mapped fault is the Mission Ridge/Arroyo Parida fault, which is approximately 500 feet to the southeast. This fault is not considered to be active. The Santa Ynez fault is the closest mapped active fault, and is approximately 4.5 miles northwest of the project site. Because no known active or potentially active faults are located within or immediately adjacent to the subject site, potential impacts associated with fault rupture from proposed development would be less than significant.

Ground Shaking and Liquefaction: The project site is located in a seismically active area of southern California (Seismic Zone 4 per 2001 California Building Code).⁶ Significant ground shaking as a result of a local or regional earthquake is likely to occur during the life of the project. Ground shaking and liquefaction are considered potentially significant impacts. The City's MEA indicates that the project site is located in an area of anticipated low-damage level to one- to three-story structures and moderate-damage level larger structures from potential earthquake ground shaking.⁷ Future development would be required to comply with building code requirements that would minimize potential hazards associated with ground shaking. The site is considered to be minimally susceptible to liquefaction in the

⁵ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

⁶ California Building Code, Chapter 16, Figure 16-2.

⁷ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

event of a strong earthquake per the City's MEA.⁸ Further, the types of soils present (high percentage of silt and/or clay) are less prone to liquefaction than a more granular material would be. The *Soils Engineering Report* prepared for the site identifies a relatively low potential for liquefaction.⁹ Therefore, impacts from ground shaking or liquefaction would be less than significant.

Seiche or Tsunami: The project site is not located within the tsunami run-up zone as identified in the City's MEA.¹⁰ "Seiche" refers to seismic waves within an enclosed water body such as a lake, which is not applicable to the project site location. No impacts related to tsunami or seiche are anticipated.

5d. Landslides or mudslides?

5e. Subsidence of the land?

5f. Expansive soils?

Landslides: The project site topography is flat; therefore, no impacts associated with landslide hazards would occur.

Subsidence: The potential for subsidence on the site is considered low, and impacts are considered less than significant. Further, recommendations in the geotechnical report include over-excavation and replacement of soils such that any risk from subsidence would be substantially reduced.¹¹

Expansive Soils: The soils tests performed at the site indicated that the soil would be classified in the "medium" expansion category per CBC Table 18-I-B. Precautionary measures are proposed in the geotechnical report to reduce any potentially significant, mitigable impacts associated with expansive soils to a less than significant level.¹²

5g. Excessive grading or permanent changes in the topography?

Grading: Site preparation would include demolition of all existing site improvements, including a motel, restaurant, and three swimming pools. Removal of these features is likely to result in disturbed soils at

⁸ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

⁹ Earth Systems Pacific, *Soils Engineering Report, Sandman Hotel and Condominiums, 3714 State Street, Santa Barbara, California*, September 25, 2003.

¹⁰ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

¹¹ Earth Systems Pacific, *Soils Engineering Report, Sandman Hotel and Condominiums, 3714 State Street, Santa Barbara, California*, September 25, 2003.

¹² Ibid.

significant depths. For the proposed project, subsurface parking garages are proposed for both the hotel and residential condominiums; developing the parking garages would result in excavation up to 15 feet in depth, excluding foundation excavation. It is anticipated that excavation will total approximately 80,000 cubic yards of material. Although the project will require extensive excavation, it is to construct underground parking facilities for the project; therefore, the proposed grading would not result in a significant alteration of the natural landform or substantially change the existing topography of the site. Impacts associated with landform changes (grading) are considered less than significant.

Required Mitigation Measures

The following mitigation measure shall be implemented:

- G-1: Geotechnical Recommendations.** Site preparation and project construction related to soil conditions and seismic hazards shall be in accordance with the recommendations contained in the *Soils Engineering Report*, prepared by Earth Systems Pacific, dated September 25, 2003. Compliance shall be demonstrated on plans submitted for grading and building permits.

Applicant's Alternative

Impacts

Could the project result in or expose people to

- 5a. Seismicity: fault rupture?
- 5b. Seismicity: ground shaking or liquefaction?
- 5c. Seismicity: seiche or tsunami?
- 5d. Landslides or mudslides?
- 5e. Subsidence of the land?
- 5f. Expansive soils?

Same as proposed project.

- 5g. Excessive grading or permanent changes in the topography?

Grading: Site preparation would include demolition of all existing site improvements, including a motel, restaurant, and three swimming pools. Removal of these features is likely to result in disturbed soils at significant depths. For the applicant's alternative, a subsurface parking garage is proposed for the residential condominiums; developing the parking garage would result in excavation up to 15 feet in depth, excluding foundation excavation. It is anticipated that excavation will total approximately 60,000 cubic yards. Although the project will require extensive excavation, it is to construct underground parking facilities for the project; therefore, the proposed grading would not result in a significant alteration of the natural landform or substantially change the existing topography of the site. Impacts associated with landform changes (grading) are considered less than significant.

Required Mitigation Measures

Same as proposed project. **Mitigation Measure G-1** shall be implemented.

11.2.6 Hazards

Proposed Project

Impacts

Could the project involve

- 6a. A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation)?
- 6b. The creation of any health hazard or potential health hazards?
- 6c. Exposure of people to existing sources of potential health hazards?

No hazardous materials are known to exist on the site with the exception of asbestos used in the construction of the existing buildings. Abatement is proposed to occur in compliance with Santa Barbara Air Pollution Control District's rules and regulations during the first phases of construction. Impacts from asbestos exposure are anticipated to be less than significant.

The proposed project (hotel and residential condominiums) is not anticipated to create any new hazards. Hazardous material usage on the site would likely be limited to the storage and use of relatively small quantities of materials such as paint, oils, cleaners, and landscape maintenance materials. Any use of hazardous materials would be subject to all applicable state and local requirements for management and disposals of such materials. No impact from hazardous materials is anticipated.

6d. Increased fire hazard in areas with flammable brush, grass, or trees?

The project site is not located in a City-designated high fire hazard area. Existing vegetation would be relocated or replaced with building and limited ornamental landscaping. The project would be subject to fire department and City ordinance requirements for adequate access, structural design, and materials. Adherence to the standard requirements of the Uniform Fire Code with respect to building design would ensure that fire hazard impacts for the proposed project would be less than significant.

Required Mitigation Measures

No mitigation is required.

Applicant's Alternative

Impacts

Could the project involve

6a. A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation)?

6b. The creation of any health hazard or potential health hazards?

6c. Exposure of people to existing sources of potential health hazards?

Same as proposed project.

6d. Increased fire hazard in areas with flammable brush, grass, or trees?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No mitigation is required.

11.2.7 Noise

Proposed Project

Impacts

Could the project result in

- 7a. Increases in existing noise levels?
- 7b. Exposure of people to severe noise levels?

Long-Term Operational Noise

The project site is located in an area subject to average ambient noise levels from roadway noise of less than 60 A-weighted decibels (dB(A)) day/night average noise level L_{dn} , 60 to 65 dB(A) L_{dn} and 65 to 70 dB(A) L_{dn} , as shown on the City's MEA noise contour maps.¹³ A project noise study¹⁴ and a supplemental noise study¹⁵ to address construction-related impacts were prepared. As part of the noise study, existing noise levels were monitored at a number of points. This information was then used to model current and future expected noise levels for the proposed project. Measured and modeled noise levels indicate current noise levels at a range of 45 to 49 dB(A) L_{dn} at the northwest corner of the site to a high of 67.7 to 70 dB(A) L_{dn} along State Street. For hotels, normally acceptable noise levels are 70 dB(A) for exterior areas and 45 dB(A) for interior areas. For residential uses, normally acceptable noise levels are 60 dB(A) for exterior areas and 45 dB(A) for interior areas.

Interior Noise Levels – Standard construction practices are considered to reduce noise levels by 15 dB(A); therefore, interior areas of the hotel and residential units exposed to exterior noise levels above 60 dB(A) L_{dn} may not meet the 45 dB(A) L_{dn} standard. Therefore, interior noise level impacts are considered potentially significant and mitigable. The noise study prepared for the project includes noise attenuation features that would reduce interior noise levels to 45 dB(A) L_{dn} or less. With incorporation of these features (**Mitigation Measures N-1** and **N-2**), interior noise level impacts would be reduced to less than significant levels.

¹³ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

¹⁴ Rincon Consultants, *Noise Study for Revised Sandman Redevelopment Project – City of Santa Barbara*, June 15, 2005.

¹⁵ *Ibid.*, *Sandman Redevelopment Housing Project, "Supplemental Noise Study to Address Construction-Related Impacts,"* April 2006.

Exterior Noise Levels – The exterior noise level at the site is less than the 70 dB(A) L_{dn} standard for hotel uses, so no mitigation would be required. However, the five residential condominiums along State Street (Unit Type E) would be subject to exterior noise levels that exceed the City’s standard for outside residential uses. The design of these two-story condominiums would attenuate noise from State Street to approximately 45.5 dB(A) L_{dn} at the required outdoor living spaces for each unit. No additional exterior mitigation is required apart from the proposed building design. All other exterior living areas on the project site would be protected from noise levels above 60 dB(A) L_{dn} . Impacts associated with exterior noise levels are considered less than significant.

Temporary Construction Noise

Uses around the project site are primarily commercial, retail, and residential. Residential uses are considered noise sensitive. The closest residences are located approximately 50 feet from the project site’s northern perimeter. Noise from grading and construction equipment, truck traffic, and vibration would affect surrounding noise-sensitive uses during the construction period (approximately two years and five months [124 weeks] for the proposed project).

The applicant has prepared a construction phasing schedule to address project length, construction equipment, trucks, and personnel required for each stage of the development. Hazardous material abatement, building demolition, and site-clearing operations for the proposed project are anticipated to last 14 weeks (3.5 months). Temporary shoring and mass excavation, which have the greatest potential noise impacts, are anticipated to last 10 weeks (2.5 months). Underground parking construction is anticipated to last 30 weeks (7.5 months). The hotel and condominium construction is scheduled to be completed over a 70-week (1 year, 4.5 months) period.

For the proposed project, the supplemental noise study concluded that, at 50 feet from sensitive receptors, construction noise during the 124 weeks of construction will range between 60–85 dB(A) CNEL, and that for 12–13 weeks of the duration of construction the noise level will range from 81–85 dB(A) at 50 feet from the sensitive receptor.¹⁶ These conclusions from the supplemental noise study are based on assumptions that mechanical equipment other than vehicles and equipment that are operated by electricity obtained from an electricity utility company would not be used before 7:00 AM or after 7:00 PM Monday through Friday or before 8:00 AM or after 7:00 on Saturday, Sunday, and holidays. Temporary construction noise impacts are considered potentially significant, mitigable (see **Mitigation Measures N-6 through N-13**).

¹⁶ Rincon Consultants, *Sandman Redevelopment Housing Project*, “Supplemental Noise Study to Address Construction-Related Impacts,” April 2006.

Required Mitigation Measures

The following mitigation measures shall be implemented:

N-1: Sound Barrier. As part of the building plan submittal, either of the following shall be included to reduce noise levels to the easternmost residence adjacent to the parking garage driveway:

- a. The easternmost residence along State Street shall include a solid wall on its eastern side to act as a noise barrier between the driveway and interior living area of that unit; or
- b. The driveway slope shall not exceed 10 percent for at least one car length at the top of the ramp where cars may be waiting to exit to State Street; do not allow windows to directly face the driveway at this location on the first floor; and use dual-glazed window panes on any second-story windows that overlook the driveway.

N-2: Interior Noise Reduction:

- a. The walls, doors, and windows of units that face State Street shall be constructed to include sufficient noise attenuation to reduce interior levels to a CNEL of 45 dB(A). This would require, at a minimum, the use of double-paned windows on all floors for those windows that face State Street.
- b. Windows shall have a minimum Standard Transmission Class (STC) of 35 and be properly installed, weather-stripped, and insulated.
- c. Doors with a minimum STC of 35 shall be used for doorways facing State Street and shall be insulated in conformance with California Title 24 requirements.
- d. The exterior wall facing shall be stucco and/or shall be designed for a minimum STC of 45.
- e. Roof or attic vents facing State Street shall be baffled.
- f. Air conditioning or a mechanical ventilation system shall be installed in at least the five dwelling units fronting on State Street, as well as the two others outside the 60-dB noise corridor so that windows and doors may remain closed. Ventilation systems shall be installed and operable prior to Certificate of Occupancy.

N-3: Exterior Residential Areas. Usable residential exterior areas (patios, balconies, courtyards) shall be oriented away from State Street to the extent feasible, and preferably shielded from roadways by the structures themselves.

- N-4: Pavement.** The residential parking lot driveway shall be paved with a coating to reduce tire squeal. This coating would consist of granulate rubber made from used tires as its aggregate and urethane resin as its binder.
- N-5: Left Turns.** Prohibit left turns onto State Street from the residential parking lot to eliminate sudden car accelerations that could otherwise occur when making this turn.
- N-6: Construction Notice.** At least 30 days prior to commencement of construction, the contractor shall provide written notice to all property owners and building occupants within 450 feet of the project area that proposed construction activities could substantially affect outdoor or indoor living areas. The notice shall contain a description of the proposed project, a construction schedule including days and hours of construction, a description of noise-reduction measures, and the name and phone number of the Project Environmental Coordinator (PEC) who can answer questions and provide additional information or address problems that may arise associated with construction noise. A 24-hour construction hot line shall be provided. Any noise complaints received shall be documented, and, as appropriate, construction activities shall be modified to the extent feasible to address such complaints. Informational signs with the PEC's name and telephone number shall also be posted at the site and shall be easily viewed from adjacent public areas.
- N-7: Construction Hours.** Noise-generating construction activities (which may include preparation for construction work) shall be permitted weekdays between the hours of 8:00 AM and 5:00 PM, excluding holidays observed by the City as legal holidays: New Year's Day (January 1); Martin Luther King Jr.'s birthday (3rd Monday in January); President's Day (3rd Monday in February); Memorial Day (Last Monday in May); Independence Day (July 4); Labor Day (1st Monday in September); Thanksgiving Day (4th-Thursday in November); Day Following Thanksgiving Day (Friday following Thanksgiving); Christmas Day (December 25). When a holiday falls on a Saturday or Sunday, the preceding Friday or following Monday respectively shall be observed as a legal holiday. Occasional night work may be approved for the hours between 5:00 PM and 8:00 AM weekdays by the Chief of Building and Zoning (per Section 9.13.015 of the Municipal Code). In the event of such night work approval, the applicant shall provide written notice to all property owners and occupants within 450 feet of the project property boundary and the City Planning and Building Divisions at least 48 hours prior to commencement of night work. Night work shall not be permitted on weekends or holidays.

- N-8: Construction Equipment Sound Barrier.** Stationary construction equipment that generates noise that exceeds 50 dB(A) at the property boundaries shall be shielded with a barrier that meets a STC) rating of 25.
- N-9: Construction Equipment Sound Control.** All construction equipment powered by internal combustion engines shall be properly muffled and maintained. No internal combustion engine shall be operated on the site without a muffler. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers. Unnecessary idling of internal combustion engines shall be prohibited.
- N-10: Construction Noise Barrier.** Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters. Whenever feasible, electrical power shall be used to run air compressors and similar power tools.
- N-11: Window Replacement.** The applicant shall offer to have a minimum 4-millimeter-thick, double-paned glass installed in the first- and second-story windows of the residences that face the project site.
- N-12: Air Conditioning.** The applicant shall offer to install temporary air conditioning in those residential units adjacent to the project site that do not already have this feature to allow residents to keep their windows closed during construction activities.
- N-13: Construction Sound Barrier Wall.** Install a temporary construction sound barrier wall along the northern half of the western edge of the project site, the entire northern end of the site, and the ~~northern half~~ portion of the eastern edge of the project site abutting the San Remo condominium complex. The barrier should be made of sound-attenuating material (not landscaping). The noise barrier can be constructed from concrete, masonry, wood, metal, or other materials determined to be appropriate by the City. To effectively reduce sound transmission through the barrier, the material chosen must be rigid and sufficiently dense (at least 20 kilograms/square meter). All noise barrier material types are equally effective, acoustically, if they have this density. The barrier shall be of sufficient height to block direct line of sight to the first story of adjacent residential uses. It is estimated that a noise barrier of the prescribed density would reduce average noise levels to sensitive receptors by up to 5 dB if the barrier blocks direct line of sight, and an additional 1.5 dB for each meter of barrier height for those uses blocked from direct line of sight.

Applicant's Alternative

Impacts

Could the project result in

- 7a. Increases in existing noise levels?
- 7b. Exposure of people to severe noise levels?

Long-Term Operational Noise:

The project site is located in an area subject to average ambient noise levels from roadway noise of less than 60 dB(A) L_{dn} , 60 to 65 dB(A) L_{dn} and 65 to 70 dB(A) L_{dn} , as shown on the City's MEA noise contour maps.¹⁷ A noise study¹⁸ and a supplemental noise study¹⁹ were prepared for the proposed project to address operational and construction-related impacts. As part of the noise study, existing noise levels were monitored at a number of points. This information was then used to model current and future expected noise levels for the proposed project. Measured and modeled noise levels indicate current noise levels at a range of 45 to 49 dB(A) L_{dn} at the northwest corner of the site to a high of 67.7 to 70 dB(A) L_{dn} along State Street. For office uses, normally acceptable noise levels are 75 dB(A) for exterior areas and 50 dB(A) for interior areas. For residential uses, normally acceptable noise levels are 60 dB(A) for exterior areas and 45 dB(A) for interior areas.

Interior Noise Levels – Standard construction practices are considered to reduce noise levels by 15 dB(A); therefore, interior areas of the office units exposed to exterior noise levels above 65 dB(A) L_{dn} may not meet the 50 dB(A) L_{dn} standard, and interior areas of the residential unit exposed to exterior noise levels above 60 dB(A) L_{dn} may not meet the 45 dB(A) L_{dn} standard. Therefore, interior noise level impacts are considered potentially significant and mitigable. The noise study prepared for the project includes noise attenuation features that would reduce interior noise levels to 45 dB(A) L_{dn} or less. These noise attenuation features can be feasibly incorporated into the office building design to reduce noise levels. With incorporation of these features (**Mitigation Measure N-2**), interior noise level impacts would be reduced to less than significant levels.

¹⁷ City of Santa Barbara, *Master Environmental Assessment*, prepared by Interface Planning and Counseling Corporation and Envicom Corporation, September 1981.

¹⁸ Rincon Consultants, *Noise Study for Revised Sandman Redevelopment Project – City of Santa Barbara*, June 15, 2005.

¹⁹ *Ibid.*, *Sandman Redevelopment Housing Project*, "Supplemental Noise Study to Address Construction-Related Impacts," April 2006.

Exterior Noise Levels – The exterior noise level at the site is less than the 75 dB(A) L_{dn} standard for office uses, so no mitigation would be required. One residential condominium may be subject to exterior noise levels that exceed the City’s 60 dB(A) standard for outside residential uses. However, given the location of the unit away from State Street and close to the 60 dB noise contour line, in addition to the proposed 6-foot tall wall located approximately 30 feet north of State Street, noise from State Street would be reduced to less than 60 dB(A) L_{dn} at the required outdoor living space for this unit. No additional exterior mitigation is required apart from the proposed wall. All other exterior living areas on the project site would be protected from noise levels above 60 dB(A) L_{dn} . Impacts associated with exterior noise levels are considered less than significant.

Temporary Construction Noise:

Uses around the project site are primarily commercial, retail, and residential. Residential uses are considered noise sensitive. The closest residences are located approximately 50 feet from the project site’s northern perimeter. Noise from grading and construction equipment, truck traffic, and vibration would affect surrounding noise-sensitive uses during the construction period (approximately two years and five months [124 weeks] for the proposed project, and two years [104 weeks] for the applicant’s alternative).

The applicant has prepared a construction phasing schedule to address project length, construction equipment, trucks, and personnel required for each stage of the development. Hazardous material abatement, building demolition, and site-clearing operations for the applicant’s alternative are anticipated to last 14 weeks (3.5 months). Temporary shoring and mass excavation, which have the greatest potential noise impacts, are anticipated to last 8 weeks (2 months). Underground parking construction is anticipated to last 24 weeks (6 months). The office and condominiums construction is scheduled to be completed over a 58-week (1 year, 1.5 months) period.

For the applicant’s alternative, impacts from construction noise would be similar to the proposed project, but would occur over shorter periods of time for the mass excavation, construction of the underground parking structure, and office and condominium construction phases (approximately five months less than the proposed project). As with the proposed project, temporary construction noise impacts associated with the applicant’s alternative are considered potentially significant and mitigable (see **Mitigation Measures N-6** through **N-13**).

Required Mitigation Measures

The following mitigation measures shall be implemented:

N-3 through N-13 (as identified above for proposed project) and

N-14: Interior Noise Reduction for Residential Units adjacent to State Street:

- a. The walls, doors, and windows of residential units closest to State Street shall be constructed to include sufficient noise attenuation to reduce interior levels to a CNEL of 45 dB(A).
- b. Windows shall have a minimum Standard Transmission Class (STC) of 35 and be properly installed, weather-stripped, and insulated.
- c. Doors with a minimum STC of 35 shall be used for doorways facing State Street and shall be insulated in conformance with California Title 24 requirements.
- d. Roof or attic vents facing State Street shall be baffled.
- e. Air conditioning or a mechanical ventilation system shall be installed in the two dwelling units outside the 60 dB noise corridor so that windows and doors may remain closed. Ventilation systems shall be installed and operable prior to Certificate of Occupancy.

N-15: Interior Noise Reduction for Office Units Adjacent to State Street:

The walls, doors, and windows of office units adjacent to State Street shall be constructed to include sufficient noise attenuation to reduce interior levels to a CNEL of 50 dB(A).

11.2.8 Population and Housing

Proposed Project

Impacts

Could the project

- 8a. Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?

The project site is located in an existing developed urban area already served by urban infrastructure. No extensions of infrastructure or urban services would be necessary to serve the project site. The proposed residential units are intended to meet existing demand for ownership housing units within the

community and would not induce growth. Growth inducing impacts as a result of the project would be less than significant.

8b. Displace existing housing, especially affordable housing?

Under the project, one residential unit would be removed (duplex at 3715 San Remo Drive would be converted to a single-family residence to allow for vehicular access to the Town & Country Apartments [3730 State Street]). While this would result in the loss of one residential unit, the project would provide 73 new housing units for the City, 11 of which would be designated as middle-income affordable housing units. No adverse housing impact would result from the project.

Required Mitigation Measures

No mitigation is required.

Applicant's Alternative

Impacts

Could the project

8a. Induce substantial growth in an area either directly or indirectly (e.g., through projects in an undeveloped area or extension of major infrastructure)?

Same as proposed project.

8b. Displace existing housing, especially affordable housing?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No mitigation is required.

11.2.9 Public Services

Proposed Project

Impacts

Could the project have an effect upon, or result in a need for new or altered services in, any of the following areas?

- 9a. Fire protection?
- 9b. Police protection?
- 9d. Maintenance of public facilities, including roads?
- 9e. Other governmental services?
- 9f. Electrical power or natural gas?
- 9g. Water treatment or distribution facilities?

The project site is located in an urban area where all public services are available. In 2005, the City prepared a *General Plan Update: 2030 Conditions, Trends, and Issues (CTI) Report*,²⁰ which examined existing conditions associated with fire protection, police protection, library services, public facilities, governmental facilities, electrical power, and natural gas. The *CTI Report* specifically analyzed whether there were deficiencies existing or anticipated for each of the public services. The *CTI Report* determined that police and fire protection services, and library services are being provided at acceptable levels to the City. In addition, the *CTI Report* determined that electricity, natural gas, telephone, and cable telecommunication services are being provided at acceptable service levels, and utility companies did not identify any deficiencies in providing service in the future. Finally, the *CTI Report* determined that demand for City buildings and facilities will continue to be impacted by growth, although no appropriate/acceptable levels of service have been established.

The project site is located in an urban area and involves the demolition of existing buildings and construction of new buildings in its place. Because the existing buildings already utilize existing public services, the project would be served with connections to existing public services for gas, electricity, cable, and telephone traversing the site, as well as access to existing roads. The project is not anticipated to create a substantially different demand on fire or police protection services, library services, or City

²⁰ City of Santa Barbara, *General Plan Update: 2030 Conditions, Trends, and Issues Report*, September 2005.

buildings and facilities than that anticipated in the *CTI Report*. Therefore, impacts from both the proposed project and the applicant's alternative to fire protection, police protection, library services, City buildings and facilities, electrical power, natural gas, telephone, and cable telecommunication services are anticipated to be less than significant.

9c. Schools?

The project site is served by the Santa Barbara Elementary and High School Districts. The proposed project would provide an increase of 73 residential units, which could generate additional students.

The project may also result in a minor increase in area employees (for the commercial portion of the project). It would be expected that some of the added employees would already reside in the area. Some portion of new employees may in-migrate. The commercial portion of the project may generate new elementary and secondary students to the extent that new employment created by the project results in new residents to the area. Unlike the residential portion of the project, which is located in a defined school attendance area, students generated by the commercial portion could live and attend a school in any area of the South Coast. Some students generated by the commercial portion could also live outside the boundaries of the Santa Barbara School Districts or attend private schools.

None of the school districts in the South Coast have been designated "overcrowded," as defined by California state law. School impact fees would be applied to the project in accordance with state law. Project impacts to schools would be less than significant.

9h. Sewer or septic tanks?

9i. Water distribution/demand?

Water

The City of Santa Barbara's water supply comes from the following sources, with the actual share of each determined by availability and level of customer demand: Cachuma Reservoir and Tecolote Tunnel, Gibraltar Reservoir and Mission Tunnel, 300 acre-feet per year (afy) of contractual transfer from Montecito Water District, groundwater, State Water Project entitlement, desalination, and recycled water. Conservation and efficiency improvements are projected to contribute to the supply by displacing demand that would otherwise have to be supplied by additional sources. In 1994, based on the comprehensive review of the City's water supply in the *Long Term Water Supply Alternatives Analysis*

(LTWSAA), the City Council approved the Long Term Water Supply Program (LTWSP).²¹ The LTWSP outlines a strategy to use the above sources to meet the projected demand of 17,900 afy (including 1,500 afy of demand projected to be met with conservation) plus a 10 percent safety margin for a total of 19,700 afy. Therefore, the target for the amount of water the system will actually have to supply, including the safety margin, is 18,200 afy. The *2003 Water Supply Management Report* documents an actual system demand of 13,460 afy and a theoretical commitment of 16,170 afy. Of the total system production, 95 percent was potable water and 5 percent was reclaimed water.²²

In 2005, the City prepared a *General Plan Update: 2030 Conditions, Trends, and Issues Report*,²³ which examined existing conditions associated with water supply, treatment, and distribution system, and specifically analyzed and determined that there were no existing or anticipated deficiencies for the next 20-year planning period based on a growth rate of 7 percent per year.

The project site receives water service from the City of Santa Barbara and is within the anticipated growth rate for the City. Therefore, the City's long-term water supply and existing water treatment and distribution facilities would adequately serve the proposed project.

The proposed project's net water demand is estimated at 19.53 afy. This increase in water use would result in a less than significant impact to the City's water supply and distribution facilities.

Sewer

The maximum capacity of the El Estero Treatment Plant is 11 million gallons per day (MGD), with current average daily flow of 8.5 MGD. The treatment plant is designed to treat the wastewater from a population of 104,000. The proposed project's estimated net new sewer demand is 15,127 gallons per day (gpd) or 16.94 afy. The potential increased sewage treatment associated with the proposed project can be accommodated by the existing City sewer system and sewage treatment plant, and would represent a less than significant impact.

9j. Solid waste disposal?

Most of the waste generated in the City is transported on a daily basis to seven landfills located around the County. The County of Santa Barbara, which operates the landfills, has developed impact significance

²¹ City of Santa Barbara, Long-Term Water Supply Program, prepared by the Water Resources Division, Public Works Department, July 5, 1994.

²² Ibid., *Water Supply Management Report*, prepared by the Water Resources Division, Public Works Department, 2003.

²³ City of Santa Barbara, *General Plan Update: 2030 Conditions, Trends, and Issues Report*, September 2005.

thresholds related to the impacts of development on remaining landfill capacity. The County thresholds are based on the projected average solid waste generation for Santa Barbara County from 1990 to 2005. The County assumes a 1.2 percent annual increase (approximately 4,000 tons per year) in solid waste generation over the 15-year period.

The County's threshold for project specific impacts to the solid waste system is 196 tons per year (this figure represents 5 percent of the expected average annual increase in solid waste generation [4,000 tons per year]). Source reduction, recycling, and composting can reduce a project's waste stream by as much as 50 percent. If a proposed project generates 196 or more tons per year after reduction and recycling efforts, impacts would be considered significant and unavoidable.

Proposed projects with a project-specific impact as identified above (196 tons per year or more) would also be considered cumulatively significant, as the project-specific threshold of significance is based on a cumulative growth scenario. However, as landfill space is already extremely limited, any increase in solid waste of 1 percent or more of the expected average annual increase in solid waste generation (4000 tons per year), which equates to 40 tons per year, is considered an adverse cumulative impact.

Long-Term (Operational)

The proposed project use is estimated to generate 268.58 tons per year of solid waste as follows:

Attached Residential: 2.65 people/unit x 73 units x 0.95 tons/year =	183.78 tons/year
Hotel/Motel: 106 rooms x 0.80 (tons/year) =	<u>84.80 tons/year</u>
Total:	268.58 tons/year

The existing use is estimated to generate 90.4 tons per year of solid waste. Therefore, the net solid waste generation of the project would be 178.18 tons per year (tpy) for the proposed project. With application of source reduction, reuse, and recycling, landfill disposal of solid waste could be reduced by 50 percent, to 89.09 tpy. The proposed project's project-specific impact is considered less than significant because the 196-ton-per-year threshold is not exceeded; however, an adverse cumulative impact would result from either because waste generation would exceed 40 tons per year.

The County of Santa Barbara is working on an update to their waste generation rates and thresholds; however, it has not yet been adopted. The draft updated waste generation numbers reflect the increase in residential trash generation over the last decade. However, a numeric threshold of significance is not identified with the updated generation rates. Because all measures that could feasibly be applied to projects are currently required by state law and City ordinance, recycling programs are available and

required throughout the City, and the County has met and is exceeding its state mandated waste diversion requirements. Operational solid waste generation from new discretionary development is considered to result in an adverse, but less than significant, solid waste impact on County-operated facilities.

Short-Term (Demolition and Construction)

Project demolition and excavation will require export of non-structural fill. The solid waste generation/disposal thresholds adopted by the City do not apply to short-term construction projects. However, new construction, especially remodeling and demolition, represents the greatest challenge to maintaining existing diversion rates. Solid waste generation guidelines have been developed by the County of Santa Barbara;²⁴ however, it should be noted that these numbers have not been adopted by the City.

Based on these guidelines, it is anticipated that the proposed project would generate 4,121 tons of waste for demolition and construction (2,640 tons of demolition waste plus 1,481 tons of construction waste).

Under the County's draft significance thresholds, any project that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on solid waste generation. Therefore, under these draft thresholds of significance, the proposed project would be considered to have a potentially significant, mitigable impact based on its construction-related solid waste generation. Although this threshold has not been formally adopted by the City, the amount of trash anticipated to be generated by the project warrants mitigation. The implementation of a solid waste management plan that includes measures to reduce, reuse, and recycle construction and demolition waste to the extent feasible would reduce short-term waste disposal impacts to less than significant.

Required Mitigation Measures

The following mitigation measures shall be implemented:

PS-1: Operational Recycling. Hotel and restaurant operators shall encourage guests to recycle by using recyclable materials and providing sufficient and appropriate receptacles, such as recycling or green waste containers, in each room. Recyclable material collection and pick-up areas shall be provided on site for the hotel and restaurant operations. The hotel and restaurant operators shall use materials that are recyclable to the extent feasible.

²⁴ County of Santa Barbara, *Environmental Thresholds and Guidelines Manual*, Chapter 17, "Solid Waste Thresholds," as revised and adopted by the Board of Supervisors September 23, 2008.

PS-2: Trash Enclosure Provision and Design. A trash enclosure with adequate area for recycling containers shall be provided on each property and screened from view from surrounding properties and the street. Dumpsters and containers with a capacity of 1.5 cubic yards or more shall not be placed within 5 feet of combustible walls, openings, or roofs unless protected with fire sprinklers. Project trash container areas shall incorporate approved long-term structural storm water best management practices (BMPs) to protect water quality. The applicant shall submit project plans to the satisfaction of Public Works Engineering and Solid Waste Department that incorporate long-term structural BMPs for trash storage areas to protect storm water quality. The owners shall maintain these structural storm water quality protections in working order for the life of the project, and shall inspect them at least annually and report to the City annually.

PS-3: Waste Management Plan. The applicant shall develop and implement a solid waste management plan to reduce waste generated by construction and demolition activities. Consistent with City of Santa Barbara ordinances, and in order to achieve the waste diversion goals required by state law, the contractor may choose to separate waste and recyclables on site or use a combination of source separation and a construction and demolition (C&D) sorting facility. The solid waste management plan shall include the following:

1. Contact information: The name and contact information of who will be responsible for implementing the solid waste management plan.
2. Waste assessment: A brief description of the proposed project wastes to be generated, including types and estimated quantities during the construction phase of this project. A minimum of 90 percent of demolition and construction materials shall be recycled or reused.
3. Recycling and waste collection areas: Waste sorting and/or collection and/or recycling areas shall be clearly indicated on the project plans and approved by the City Solid Waste Specialist.
4. Transportation: A description of the means of transportation of recyclable materials and waste (whether materials will be site-separated and self-hauled to designated centers, or whether mixed materials will be collected by a waste hauler and removed from the site to be processed) and destination of materials.
5. Landfill information: The name of the landfill(s) where trash will be disposed of and a projected amount of material that will be landfilled.

6. Meetings: A description of meetings to be held between applicant and contractor to ensure compliance with the site solid waste management plan.
7. Alternatives to landfilling: A list of each material proposed to be salvaged, reused, or recycled during the course of the project.
8. Contingency Plan: An alternate location to recycle and/or stockpile C&D in the event of local recycling facilities becoming unable to accept material (for example: all local recycling facilities reaching the maximum tons per day due to a time period of unusually large volume).
9. Implementation and documentation of solid waste management plan:
 - a. Manager: The permit applicant or contractor shall designate an on-site party (or parties) responsible for instructing workers and overseeing and documenting results of the solid waste management plan for the project site foreman. The contact will notify the Public Works Department immediately should any deviance from the solid waste management plan be necessary.
 - b. Distribution: The contractor shall distribute copies of the solid waste management Plan to the job site foremen, impacted subcontractors, and the architect.
 - c. Instruction: The permit applicant or contractor shall provide on-site instruction of appropriate separation, handling, and recycling, salvage, reuse, and return methods to be used by all parties at the appropriate stages of project development.
 - d. Separation and/or collection areas: The permit applicant or contractor shall ensure that the approved recycling and waste collection areas are designated on site.
 - e. Construction of recycling and waste container facilities: Inspection shall be made by Public Works to ensure the appropriate storage facilities are created in accordance with AB 2176, California State Public Resources Code 42911 and City of Santa Barbara Zoning Ordinances.
 - f. Hazardous wastes: Hazardous wastes shall be separated, stored, and disposed of according to federal, state, and local regulations.
 - g. Documentation: The contractor shall submit evidence at each inspection to show that recycling and/or reuse goals are being met and a summary of waste generated by the project shall be submitted on a monthly basis. Failure to submit this information shall be grounds for a stop work order. The summary shall be submitted on a form acceptable to the Public Works Department and shall contain the following information:

- Disposal information: amount (in tons or cubic yards) of material landfilled; identity of the landfill; total amount of tipping fees paid at the landfill; weight tickets, manifests, receipts, and invoices (attach copies).
 - Recycling information: amount and type of material (in tons or cubic yards); receiving party; manifests, weight tickets, receipts, and invoices (attach copies).
 - Reuse and salvage information: list of items salvaged for reuse on project or campus (if any); amount (in tons or cubic yards); receiving party or storage location.
- h. Contingency Plan: The permit applicant or contractor shall detail the location and recycling of stockpiled material in the event of the implementation of a contingency plan.

Applicant's Alternative

Impacts

Could the project have an effect upon, or result in a need for new or altered services in, any of the following areas?

- 9a. Fire protection?
- 9b. Police protection?
- 9d. Maintenance of public facilities, including roads?
- 9e. Other governmental services?
- 9f. Electrical power or natural gas?
- 9g. Water treatment or distribution facilities?

Same as proposed project.

- 9c. Schools?

Same as proposed project.

- 9h. Sewer or septic tanks?
- 9i. Water distribution/demand?

Water

Similar to proposed project; however, the applicant's alternative's net water demand is estimated at 7.44 afy (compared to 19.53 afy for the proposed project). This increase in water use would result in a less than significant impact to the City's water supply and distribution facilities.

Sewer

Similar to proposed project; however the applicant's alternative's net sewer demand would be 5,922 gpd or 6.63 afy (compared to 16.94 afy for the proposed project). The potential increased sewage treatment associated with the applicant's alternative can be accommodated by the existing City sewer system and sewage treatment plant, and would represent a less than significant impact.

9j. Solid waste disposal?

Same as proposed project.

Long-Term (Operational)

The applicant's alternative use is estimated to generate 195.46 tons per year of solid waste as follows:

Attached Residential: 2.65 people/unit x 73 units x 0.95 tons/year =	183.78 tons/year
Office: 14,600 square feet x 0.0013tons/year. =	<u>18.98 tons/year</u>
Total:	202.76 tons/year

The existing use is estimated to generate 90.4 tons per year of solid waste. Therefore, the net solid waste generation of the project would be 112.36 tpy for the applicant's alternative. With application of source reduction, reuse, and recycling, landfill disposal of solid waste could be reduced by 50 percent, to 56.18 tpy (compared to 89.09 tpy for the proposed project). The applicant's alternative's project-specific impact is considered less than significant because the 196-ton-per-year threshold is not exceeded; however, an adverse cumulative impact would result from either because waste generation would exceed 40 tons per year.

Short-Term (Demolition and Construction)

Project demolition and excavation will require export of non-structural fill. The solid waste generation/disposal thresholds adopted by the City do not apply to short-term construction projects. However, new construction, especially remodeling and demolition, represents the greatest challenge to maintaining existing diversion rates. Solid waste generation guidelines have been developed by the

County of Santa Barbara; however, it should be noted that these numbers have not been adopted by the City.

Based on these guidelines, it is anticipated that the applicant's alternative would generate 2,640 tons of waste for demolition (same as proposed project); however, it would only generate approximately 1,000 tons of construction waste for a total of 3,640 tons.

Under the County's draft significance thresholds, any project that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on solid waste generation. Therefore, under these draft thresholds of significance, the applicant's alternative would be considered to have a potentially significant, mitigable impact based on its construction-related solid waste generation. Although this threshold has not been formally adopted by the City, the amount of trash anticipated to be generated by the project warrants mitigation. The implementation of a solid waste management plan that includes measures to reduce, reuse, and recycle construction and demolition waste to the extent feasible would reduce short-term waste disposal impacts to less than significant.

Required Mitigation Measures

Similar to proposed project. **Mitigation Measures PS-2** and **PS-3** shall be implemented.

11.2.10 Recreation

Proposed Project

Impacts

Could the project

10a. Increase the demand for neighborhood or regional parks or other recreational facilities?

Currently, within the City there are more than 1,800 acres of natural open space, park land, and other recreational facilities. In addition, there are 28 tennis courts, 2 public outdoor swimming pools, beach volleyball courts, sport fields, lawn bowling greens, a golf course, 13 community buildings, and a major skateboard facility. The City also offers a wide variety of recreational programs for people of all ages and abilities in sports, various classes, tennis, aquatics, and cultural arts.

In 2005, the City prepared a *General Plan Update: 2030 Conditions, Trends, and Issues (CTI) Report*, which examined existing conditions associated with recreation and parks.²⁵ Population characteristics including

²⁵ City of Santa Barbara, *General Plan Update: 2030 Conditions, Trends, and Issues Report*, September 2005.

income, age, population growth, education, and ethnicity affect recreation interests and participation levels.

The National Recreation and Park Association (NRPA) has established park service area standards for various types of parks. The NRPA standards have not been adopted by the City; however, the standards do provide a useful tool for assessing park space needs. The *CTI Report* determined that, based on NRPA standards, there is an uneven distribution of parkland in the City, such that some areas of the City may currently be underserved with neighborhood and community parks, but overall the City has adequate passive, community, beach, regional, open space, and sports facility parks.

The development of the proposed project with new residences and a hotel, or the applicant's alternative with new residences and offices, would create an increase in the demand for park and recreational opportunities in the general area. As indicated above, the City of Santa Barbara has ample parkland, albeit unevenly distributed, throughout the City and adequate recreation facilities. Both the proposed project and applicant's alternative would introduce additional residents into the North State neighborhood, where existing nearby neighborhood parks (those intended to serve nearby residents) include MacKenzie Park, Stevens Park, Willowglen Park, and Los Robles Park. None of the above referenced neighborhood parks are within the NRPA 0.25- to 0.5-mile radius standard of the proposed project site. Residents of the residential condominiums (of either the proposed project or the applicant's alternative) would have access to these neighborhood parks, although somewhat less conveniently than if located within the NRPA standard distance. In addition, residents would have access to other community, beach, regional, open space and sports facility parks, plus all City recreation programs.

Because of the transient nature of hotel guests, their park and recreation needs differ from that of residents. Often, on-site recreational opportunities are provided that are tailored to hotel guest needs (i.e., swimming pool, kids' game room, etc.). In addition, hotel guests often seek more tourist-oriented attractions and destinations, and, overall, their use of neighborhood and community parks is limited. Employees of the offices would not require recreational areas.

The increase in park and recreational demands associated with the residences, hotel guests, and office employees is considered a less than significant impact.

10b. Affect existing parks or other public recreational facilities?

As described above, the project site is not within close proximity of either neighborhood or community parks. The project is located across State Street from a path along San Roque Creek, and within a block of the YMCA facility. However, the proposed residential condominium, hotel, and commercial office land uses by their nature, would not interfere or cause a substantial loss of use of existing parks or recreational

facilities by means of obnoxious or offensive emission of odors, dust, gas, fumes, smoke, liquids, wastes, noise, vibrations, or disturbances. Therefore, the project would have a less than significant impact on recreational facilities.

Required Mitigation Measures

No mitigation is required.

Proposed Project

Impacts

Could the project

10a. Increase the demand for neighborhood or regional parks or other recreational facilities?

Same as proposed project; however, office use would replace the hotel use, thereby slightly changing the demand for park facilities (office employee use versus hotel employee and guest use).

10b. Affect existing parks or other public recreational facilities?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No mitigation is required.

11.2.11 Transportation and Circulation

Proposed Project

Impacts

Could the project result in

11c. Inadequate emergency access or access to nearby uses?

The fire department has reviewed the site plan for the proposed project and has indicated that emergency vehicle maneuvering areas are adequate and access/distance from fire-fighting equipment to the proposed structures meets standards. Emergency access impacts of the project would be less than significant.

11e. Hazards or barriers for pedestrians or bicyclists?

The project proposes to widen the sidewalk from approximately 4 feet in width to 8 feet in width with a 4-foot-wide parkway adjacent to State Street. This would increase pedestrian circulation opportunities and improve the pedestrian environment along the State Street corridor. Impacts associated with sidewalk improvements are considered less than significant.

Required Mitigation Measures

No additional mitigation is required.

Applicant's Alternative

Impacts

Could the project result in

11c. Inadequate emergency access or access to nearby uses?

Same as proposed project.

11e. Hazards or barriers for pedestrians or bicyclists?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. No additional mitigation is required.

11.2.12 Water Environment

Proposed Project

Impacts

Could the project result in

12a. Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?

12c. Discharge into surface waters?

12e. Increased storm water drainage?

Drainage: Drainage from the site sheet flows in a southerly direction down the existing driveway to State Street, at which point it flows in a westerly direction via curb and gutter towards drainage inlets that eventually convey runoff to Arroyo Burro Creek. The *Preliminary Drainage Analysis* indicates that runoff from the site in a 25-year storm event would increase by 0.90 cubic feet per second following construction of the project. An underground collection system is proposed to reduce the increase in peak flow, and corresponding overall drainage volume, to pre-project levels.²⁶ Thus, there would be no net increase of runoff and impacts would be less than significant.

Surface Water Quality: Project demolition and grading activities create the potential for erosion and sedimentation to affect water quality. Surface water quality impacts are, therefore, considered potentially significant and mitigable through implementation of erosion-control measures. Numerous federal, state, and local regulatory programs have been established to minimize impacts to water quality resulting from construction operations. Compliance with applicable regulations and the mitigation requirements provided below will reduce the potential for the proposed project to result in short-term construction-related water quality impact to a less than significant level.

Runoff of pollutants from parking areas or commercial operations could also degrade water quality. Project drainage will be designed to flow south toward State Street, as it currently flows. Storm flows that are directed to the underground garage areas will be pumped via a lift station up to grade. Outflow from the detention facility will be discharged via gravity flow to an existing subsurface storm drain conduit under State Street. Compliance with standard City requirements would reduce the project's potentially significant, mitigable long-term water quality impacts to a less than significant level. These requirements include the preparation of an operation and maintenance plan for the use of storm drain surface water pollutant interceptors, stenciling of storm drain warnings of the direct connection of the drainage system to creeks and the ocean, and implementation of water quality protection BMPs.

12b. Exposure of people or property to water related hazards such as flooding?

The project site is not within a flood hazard area as shown on the Federal Insurance Rate Map published by Federal Emergency Management Agency (FEMA). No impacts are anticipated related to flooding.

12d. Change in the quantity, quality, direction or rate of flow of ground waters?

²⁶ Flowers & Associates, Inc., *Preliminary Drainage Analysis, Sandman Inn Redevelopment and Condominium Project*, April 20, 2005 – revised April 27, 2006.

The groundwater table on site was measured at 22 to 26 feet below the surface in 2003. On-site grading is not anticipated to reach the level of the groundwater table; therefore, direct contact with groundwater is not anticipated to occur. Therefore, no impacts to groundwater are expected.

Required Mitigation Measures

The following mitigation measures shall be implemented:

W-1: Construction Erosion/Sedimentation Control Plan. Project grading and construction shall be conducted in accordance with an approved erosion control plan to protect water quality throughout the duration of site preparation, earthwork, and construction process. Prior to the issuance of a demolition or building permit for the proposed project, the applicant or project developer shall prepare an erosion control plan that is consistent with the requirements outlined in the *Procedures for the Control of Runoff into Storm Drains and Watercourses* and the Building and Safety Division *Erosion/Sedimentation Control Policy* (2003). The erosion control/water quality protection plan shall specify how the required water quality protection procedures are to be designed, implemented, and maintained over the duration of the development project. A copy of the plan shall be submitted to the Community Development and Public Works Departments for review and approval, and a copy of the approved plan shall be kept at the project site.

At a minimum, the erosion control/water quality protection plan prepared for the proposed project shall address the implementation, installation, and/or maintenance of each of the following water resource protection strategies: paving and grinding, sandbag barriers, spill prevention/control, solid waste management, storm drain inlet protection, stabilize site entrances and exits, illicit connections and illegal discharges, water conservation, stockpile management, liquid wastes, street sweeping and vacuuming, concrete waste management, sanitary/septic waste management, vehicle and equipment maintenance, vehicle and equipment cleaning, and vehicle and equipment fueling.

W-2: Minimization of Storm Water Pollutants of Concern. The applicant shall implement approved plans incorporating long-term storm water best management practices (BMPs) to minimize identified storm water pollutants of concern including automobile oil, grease and metals. The applicant shall submit project plans incorporating long-term BMPs to minimize storm water pollutants of concern to the extent feasible, and obtain approval from Public Works Engineering. The owners association shall maintain approved

facilities in working order for the life of the project, and shall inspect annually and submit report to City annually.

W-3: Storm Drain System Stenciling and Signage. Within the project area, the applicant shall implement stenciling of all storm drain inlets and catch basins, and posting of signs at all public access points along channels and creeks, with language in English and Spanish and graphic icons prohibiting dumping, per approved plans. The applicant shall submit project plans to the satisfaction of Public Works Engineering that identify storm drain inlet locations throughout the project area, and specified wording and design treatment for stenciling of storm drain inlets and signage for public access points that prohibit dumping. The owners association shall maintain ongoing legibility of the stenciling and signage for the life of the project, and shall inspect at least annually and submit report annually.

Applicant's Alternative

Impacts

Could the project result in

- 12a. Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?
- 12c. Discharge into surface waters?
- 12e. Increased storm water drainage?

Drainage: Drainage from the site sheet flows in a southerly direction down the existing driveway to State Street, at which point it flows in a westerly direction via curb and gutter towards drainage inlets that eventually convey runoff to Arroyo Burro Creek. The *Preliminary Drainage Analysis* indicates that runoff from the site in a 25-year storm event would increase by 0.90 cubic feet per second following construction of the proposed project. While a similar analysis has not been prepared for the applicant's alternative, permeable surface area would be greater in that additional turf area is available along the front of the site facing State Street and runoff would be proportionally reduced. An underground collection system is proposed to reduce the increase in peak flow, and corresponding overall drainage volume, to pre-project levels.²⁷ Thus, there would be no net increase of runoff and impacts would be less than significant.

Surface Water Quality: Same as proposed project.

- 12b. Exposure of people or property to water related hazards such as flooding?

²⁷ Flowers & Associates, Inc., *Preliminary Drainage Analysis, Sandman Inn Redevelopment and Condominium Project*, April 20, 2005 – revised April 27, 2006.

Same as proposed project.

12d. Change in the quantity, quality, direction or rate of flow of ground waters?

Same as proposed project.

Required Mitigation Measures

Same as proposed project. **Mitigation Measures W-1** through **W-3** shall be implemented.

12.0 COMMENTS AND RESPONSES TO COMMENTS

12.1 INTRODUCTION

Section 15132 of the *California Environmental Quality Act (CEQA) Guidelines* states that the Final EIR shall consist of: “(a) the draft EIR or a revision of the draft; (b) comments and recommendations received on the draft EIR either verbatim or in summary; (c) a list of persons, organizations and public agencies comments on the draft EIR; and (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process.” This section of the Final EIR contains responses to written comments received during the public review period for the Draft EIR.

The April 2009 Draft EIR was submitted to the State Clearinghouse, Governor’s Office of Planning and Research, and circulated for a 30-day public review period beginning on April 22, 2009, and ending on May 22, 2009. A public hearing was held on May 14, 2009 to collect additional comments on the Draft EIR. Included within this section of the Final EIR are the City of Santa Barbara’s responses to all written comments received during the public review period and to comments made at the public hearing.

The City’s responses to comments on the April 2009 Draft EIR represent a good faith, reasoned effort to address the environmental issues identified by the comments. Under *State CEQA Guidelines* Section 15088(a), the City is not required to respond to all comments on the April 2009 Draft, but only to respond to those comments that raise environmental issues. Case law under CEQA recognizes that the City need only provide responses to comments that are commensurate in detail with the comments themselves. In the case of specific comments, the City has responded with specific analysis and detail; in the case of a general comment, the reader is referred to a related response to a specific comment, if possible.

12.2 LIST OF AGENCIES AND INDIVIDUALS THAT COMMENTED ON THE DRAFT EIR

The City received 16 comments pertaining to the April 2009 Draft EIR. These letters included submissions from one state agency, as well as from organizations and private individuals. Comments were received by the City as mailed letters, e-mails, and faxes. Each of these comments is responded to in this the Final EIR. These letters are reproduced in this section, followed by the City’s response to each letter. The comments contained in each letter have been numbered in order to provide a corresponding response from the City. For example, the first comment contained in **Letter No. 1**, from the California Department of Transportation, is listed as **Comment 1-1**, and **Response No. 1-1** from the City corresponds to this comment.

At the public hearing held before the City Planning Commission on May 14, 2009, comments were received from six individuals or organization. The comments are summarized based on notes taken at the hearing and numbered sequentially. A response for each comment is provided below.

12.2.1 List of Written Comments on the Draft EIR

1. Chris Shaeffer, California Department of Transportation, May 7, 2009
2. John DeVore, May 10, 2009
3. Paul Hernadi, Citizens Planning Association, May 10, 2009
4. John C. Jostes, Interactive Planning and Management, May 11, 2009
5. Judith Dodge Orias, Allied Neighborhoods Association, May 12, 2009
6. Judith Dodge Orias, May 12, 2009
7. Rhonda Adawi, May 12, 2009
8. Vijaya Jammalamadaka, Santa Barbara County Air Pollution Control District, May 12, 2009
9. Jim and Ginger Peterson, May 13, 2009
10. Paula Westbury, May 13, 2009
11. Connie Hannah, League of Women Voters of Santa Barbara, May 14, 2009
12. Herbert Simkins, May 14, 2009
13. Linda Antone, May 14, 2009
14. Naomi Kovacs, Citizens Planning Association, May 21, 2009
15. Gregory J. Parker, Investec, May 22, 2009
16. Isabelle Greene, May 22, 2009

12.2.2 List of Verbal Comments made at May 14, 2009 Planning Commission Public Hearing

1. Paul Hernadi, Citizens Planning Association
2. Mary Louise Days, Citizens Planning Association
3. Naomi Kovacs, Citizens Planning Association
4. Jean Holmes, Grove Lane Neighborhood Association
5. Judy Orias, Allied Neighborhood Association
6. Connie Hannah, Santa Barbara League of Women Voters
7. Planning Commissioner Harwood "Bendy" White
8. Planning Commissioner Charmaine Jacobs
9. Planning Commissioner Bruce Bartlett
10. Planning Commissioner Sheila Lodge

12.3 RESPONSES TO COMMENTS

12.3.1 Responses to Written Comment Letters

This section provides responses to the comments letters received on the Draft EIR during the 30-day review period.

DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
SAN LUIS OBISPO, CA 93401-5415
PHONE (805) 549-3101
FAX (805) 549-3329
TDD (805) 549-3259
<http://www.dot.ca.gov/dist05/>



*Flex your power!
Be energy efficient!*

May 7, 2009

Allison De Busk
City of Santa Barbara
PO Box 1990
Santa Barbara, CA 93102-1990

SB-101-17.8
SCH 2007011090

Subject: Draft Environmental Impact Report for 3714-3744 State Street; Sandman Project

Dear Ms. De Busk:

Thank you for the opportunity to provide comments upon the Draft Environmental Impact Report for the proposed 3714-3744 State Street; Sandman Project. Caltrans' offers the following comments:

- 1. DEIR traffic study, page 10: A number of CMP Study Area Intersections are listed which do not appear to be included in the study. Of particular note are the ramps and ramp nodes at Las Positas Road and US 101 interchange and the US 101 NB ramp/Calle Real/Earl Warren Showground intersection.
- 2. The US 101 NB diverge at Hope Avenue off-ramp currently operates at LOS F in the am peak hour and LOS E in pm peak hour. In July 2004 a Project Study Report (PSR) was approved for an auxiliary lane on northbound US 101 between Las Positas Road and Hope Ave off-ramp. This study was accomplished at the request of the Santa Barbara County Association of Governments and the City of Santa Barbara. The PSR is identified as EA 0H340k. This highway improvement project provides a mitigation mechanism that can be use for this development, and all others, which add any trips to this on- and off-ramp area. The subject development should be required to participate financially, on a pro-rata basis, toward the auxiliary lane project.
- 3. In conjunction paragraph 2, the DEIR should discuss whether the auxiliary lane project is included in the City's Capital Improvement Program and/or AB1600 program.

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Thank you again for the opportunity to provide comments on this project. If you have any questions regarding these comments, please call me at (805) 549-3632.

Sincerely,

Chris Shaeffer
Caltrans District 5
Development Review

Cc. Larry Newland, CT

"Caltrans improves mobility across California"

Comment Letter No. 1, California Department of Transportation, May 7, 2009

Response 1-1

Locations included in the Congestion Management Plan (CMP) intersection list, but not analyzed in the report, are locations that are not projected to experience any increase in traffic volumes with the proposed land uses versus the existing uses. Therefore, no analysis was required.

Response 1-2

Since no additional project-related traffic is projected for the US 101 ramps, no contribution to the proposed highway project would be required of the proposed project.

Response 1-3

The City does not include Caltrans projects as part of its CIP list or other programs.

Letter No. 2

-----Original Message-----
From: DeVore Family [mailto:devore@cox.net]
Sent: Sunday, May 10, 2009 3:59 PM
To: Community Development PC Secretary
Cc: DeBusk, Allison L.
Subject: RE Sandman Inn Redevelopment

Dear Planning Commissioners,

I am pleased that the applicant for the Sandman Inn redevelopment has come in with a second proposal for a considerably smaller commercial project. Given the current jobs/housing imbalance as well as the already congested traffic conditions on Upper State Street, the second, reduced proposal is much better. That said, the second alternative could be even better with a few small changes, such as locating the State Street access away from the Hitchcock intersection to reduce congestion, adding some open space for the condominium residents, and further reducing the number of market-rate units because of their affect on the jobs/housing imbalance as well as water usage.

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Thank you,

John DeVore
429 Stanley Drive

Comment Letter No. 2, John DeVore, May 10, 2009

Response 2-1

The commenter states a preference for the applicant's alternative over the proposed project. The comment is noted and no response is required.

Response 2-2

The proposed project and applicant's alternative would both reduce the number of access points along State Street from four driveways to two, and would remove the driveway nearest Hitchcock Way. As noted in the EIR, the two project driveways, as proposed in both the proposed project and applicant's alternative, are consistent with the Upper State Street Study (USSS) guidelines in terms of reducing the number of access driveways from the current four driveways. However, even with the reduction to two driveways as proposed, the driveway spacing in relation to each other and to the State Street/Hitchcock Way intersection is less than optimal. As identified in the USSS, optimally, the spacing between a driveway and the Hitchcock Way intersection should be more than 110 feet (see Table 3 of the USSS guidelines). However, a spacing of 100 feet would be acceptable if a wider spacing could not be provided. A more desirable location would be at least 300 feet east of Hitchcock Way. This is so that vehicles exiting the site and wanting to access the westbound left-turn lane at Hitchcock would be entering State Street beyond the start of the turn lane. However, as noted above the proposed commercial driveway is about 210 feet from the Hitchcock Way intersection and would be acceptable. The traffic impact analysis performed for the proposed project concluded that no significant impacts to traffic at the intersection of State Street and Hitchcock Way would occur with development of either the proposed project or the applicant's alternative.

Section 9.4.4 of the EIR analyzes an alternative with single driveway access.

Response 2-3

The initial study performed for the proposed project concluded that project impacts related to recreational resources would be less than significant.

As noted in the Initial Study the proposed development of the proposed project with new residences and a hotel would create an increase in the demand for park and recreational opportunities in the general area. The City of Santa Barbara has ample parkland, albeit unevenly distributed throughout the City and adequate recreation facilities. The project would introduce additional residents into the North State neighborhood where existing nearby neighborhood parks (those intended to serve nearby residents) include MacKenzie Park, Stevens Park, Willowglen Park and Los Robles Park. Residents of the proposed project would have access to these neighborhood parks. In addition, residents would have access to other community, beach, regional, open space and sports facility parks, and all City recreation programs.

The City of Santa Barbara Zoning Ordinance Section 28.21.081 requires that residential development in the R-3 and R-4 zones provide outdoor living space, which may be in the form of private or common outdoor living space.¹ Section 28.51.081 requires residential development in the C-P zone provide outdoor living space in accordance with the provisions of the R-3 and R-4 zones.² The applicant has chosen to provide common outdoor living space for the development, which requires that 15% of the net lot area be provided as common outdoor living space.

The residential portion of the proposed project is located on a lot 141,081 square feet (sf) in size. The total lot area including the hotel parcel is 198,013 sf. Based on the size of the residential lot, 21,162 sf of common outdoor living space would be required for the residential development. If the calculation is based on the size of the entire project site, the amount of common outdoor living space required would increase to 29,702 sf. The proposed residential development includes 23,600 sf of common outdoor living space. This would meet the requirements of the Zoning Ordinance for the residential lot. A calculation of the open space areas on the hotel parcel is not available; however, based on site plans that show outdoor living areas within the proposed hotel development, the total outdoor living area for the entire project site would meet or exceed 29,702 sf. The proposed project is therefore potentially consistent with City requirements for outdoor living space.

The residential portion of the applicant's alternative is located on a lot 153,365 sf in size. The total lot area including the office parcel is 198,013 sf. Based on the size of the residential lot, 23,004 sf of common outdoor living space would be required for the residential development. If the calculation is based on the size of the entire project site, the amount of common outdoor living space required would increase to 29,702 sf. The proposed residential development includes 29,300 sf of common outdoor living space. This would meet the requirements of the Zoning Ordinance for the residential lot. A calculation of the open space areas on the office parcel is not available, but, based on site plans that show outdoor living areas within the office development, the total outdoor living area for the entire project site would meet or exceed 29,702 sf. The applicant's alternative is therefore potentially consistent with City requirements for outdoor living space.

In addition to satisfying the zoning ordinance requirements for the provision of common outdoor living space, the residential portion of the project includes private outdoor areas for each residential unit. Ultimately, the Planning Commission must determine whether or not the project provides adequate open space based on City policy; but this does not represent a significant environmental impact.

¹ City of Santa Barbara, *Municipal Code*, Sec. 28.21.081.

² City of Santa Barbara, *Municipal Code*, Sec. 28.51.081.

Response 2-4

The proposed project and the applicant's alternative both consist of the demolition the existing 113-room Sandman Inn hotel and the construction of new commercial development (either a new 106-room hotel in the case of the proposed project or 14,264 square feet of office space in two buildings in the case of the applicant's alternative) and 73 residential units, 62 of which would be market-rate units and 11 of which would be medium-income affordable units. As discussed in **Section 5.0, Land Use and Policy Consistency**, of the EIR, the proposed project and the applicant's alternative would be consistent with existing General Plan land use designations and with existing zoning for the project site. The residential component of both the proposed project and the applicant's alternative would furthermore be consistent with General Plan policies in the Circulation and Housing Elements that support the construction of affordable housing, the development of housing near transit opportunities, and the location of compact pedestrian-oriented development near major transit corridors.

This comment states that the development of market-rate residential units exacerbates the existing jobs/housing imbalance by creating additional jobs and increases water usage.

The jobs/housing balance is a simple ratio of the number of houses to the number of jobs within a designated area. Currently, the City of Santa Barbara offers more employment opportunities than it does housing opportunities. Based on data provided in the current Santa Barbara County Association of Governments (SBCAG) 2007 Regional Growth Forecast, in 2005 the City had a population of 89,800 residents, and provided 63,699 jobs.³ The US Census Bureau estimate for the period 2005–2007 indicated a resident labor force of 49,375 and a housing stock of 38,172 residential units.⁴ Based on these numbers, the City provides approximately 1.7 jobs per residential unit.

While new residents of both market-rate and affordable housing units may generate additional demand for goods and services within the City, no information is available that indicates the extent to which this demand would not be able to be accommodated by existing goods and services providers.

As described above, the proposed project and the applicant's alternative would remove an existing commercial development and construct both commercial and residential development. Thus, the amount of housing on the site would increase from 0 units to 73 units, including 11 affordable units, and a

³ Santa Barbara County Association of Governments, *Regional Growth Forecast 2005–2040*, (2007) <http://www.sbcag.org/publications.html>.

⁴ US Census Bureau, "Santa Barbara city, California Fact Sheet," http://factfinder.census.gov/servlet/ACSSAFFacts?_event=&geo_id=16000US0669070&_geoContext=01000US|04000US06|16000US0669070&_street=&_county=santa+barbara&_cityTown=santa+barbara&_state=04000US06&_zip=&_lang=en&_sse=on&ActiveGeoDiv=&_useEV=&pctxt=fph&pgsl=160&_submenuId=factsheet_1&ds_name=DEC_2000_SAFF&_ci_nbr=null&qr_name=null®=null%3Anull&_keyword=&_industry=

commercial, employment-generating use would remain on the site. Based on employment holding capacity numbers for similar uses in nearby jurisdictions,⁵ the existing hotel and restaurant development is expected to generate four jobs per thousand square feet of development, or approximately 130 jobs. The proposed hotel development would generate two jobs for every thousand square feet of development, which would result in approximately 125 jobs. The office development in the applicant's alternative would generate four jobs for every thousand square feet of development, or approximately 57 jobs. Thus, the jobs to housing balance for the proposed project would be approximately 1.8 jobs per residential unit (125 jobs for 73 units), while the applicant's alternative would create approximately 0.8 job per housing unit (57 jobs for 73 units).

The proposed project thus would create a number of jobs equal to the existing development, while the applicant's alternative would create an approximately 80 percent reduction in the number of jobs generated by the project site. In either case, the City's jobs/housing balance would be slightly improved over existing conditions as net new housing units would be provided under either the proposed project or the applicant's alternative.

As identified in Section 11.2.9 of the EIR, the project would result in an increased demand for water compared to the existing development. However, this increased demand is considered to be a less than significant impact. Any reduction in residential units or commercial development would have a corresponding reduction on projected water demand. Nevertheless, due to the relatively small size of the development relative to the City's water supply, water supply is not considered to be a significant impact.

⁵ Data for employment holding capacity for the City of Ventura as provided on the Land Use Appendix, Figure 3.2.3 – Employment Holding Capacity, for the Ventura County General Plan (July 22, 2008) was utilized. This information noted that for commercial use, 4.0 jobs would be provided per 1,000 sq. ft. of floor space, and for tourist (including hotel uses) 2.0 jobs would be provide per 1,000 sq. ft. of floor space.



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RE: Sandman Inn Redevelopment -- DEIR and Concept Review comments
TO: Planning Commission
CC: Allison DeBusk
FROM: Citizens Planning Association's South Coast Land Use Committee

DATE: May 10, 2009

Dear Chair Larson and Planning Commissioners:

This letter by CPA's South Coast Land Use Committee comments on the April 2009 Draft EIR addressing two versions of the Sandman Inn Redevelopment proposal: the original Project (a three-story, 62,298-square-foot hotel plus 73 residential condominiums) and the Applicant's Alternative (two two-story buildings for 14, 254 square-feet of office space plus 73 residential condominiums).

1

Introduction

Our 8-page scoping comment, dated June 24, 2008, and reproduced in the Draft EIR (Volume II, pp. 63-70 of 577), argued that the May 2008 Initial Study failed to reveal the proposed redevelopment's full environmental impacts. Since we find the present Draft EIR's approach to the original Project similarly flawed, we are delighted that the applicant decided to propose a more attractive and far more sustainable alternative.

Hoping that Planning Commission shares ABR's strong preference for the Applicant's Alternative, our present comments focus on that alternative. But if needed, we will later submit a detailed account of what we perceive as major flaws in the DEIR's approach to the original Project.

Summary

Given the DEIR's attribution of major advantages to the Applicant's Alternative (see items 1 - 6 below), we believe that the Alternative should have been declared environmentally superior to the original Project. At the same time, we urge that close attention be paid to the need to improve the Applicant's Alternative further (see items 7- 12 below) and propose a relatively simple way to achieve that objective (see "Conclusion" below).

Some environmental advantages of the Applicant's Alternative directly or indirectly acknowledged by the DEIR

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1. By reducing the height and bulk of the original project's commercial component, the Applicant's Alternative would largely avoid obstructing existing mountain views and would be generally more compatible with the neighborhood. The bulk reduction also removes the original Project's need to request a transfer of development rights from another location.
2. By reducing the trip generation potential and parking needs of the original project's commercial component, the Applicant's Alternative would moderate the proposed redevelopment's adverse impact on mid-block congestion and on the number of U-turns at nearby intersections associated with the right-

CPA LUC Sandman DEIR comments of 2009-05-10 p.1 of 3

turn-only egress and ingress. The following figures indicate the extent of the impact reduction: while the original Project was expected to generate 1,535 average daily trips and proposed 291 parking spaces, the Applicant's Alternative is expected to generate 899 average daily trips and proposes 239 parking spaces.

3. The Applicant's Alternative would result in significant reduction in water and sewer usage, as well as in solid waste generation. The following figures indicate the diminished impact estimated by the DEIR for the offices versus the hotel. Water: 7.44 acre feet per year versus 19.53 afy; sewer: 6.63 afy versus 16.94; solid waste: 18.98 tons per year versus 84.80. The total impact figures, which include the unchanged impact of the 73 residences as well, are of course much higher.
4. By moving five residential units further away from State Street, the Applicant's Alternative would reduce the number of units requiring closed windows and built-in air conditioning or mechanical ventilation for indoor noise mitigation from 7 to 2 units. We also note that the same spatial rearrangement would expose fewer residential units to the worst effects of traffic-generated air pollution.
5. By avoiding the construction of a large three-story hotel and the associated need for the underground parking of 111 cars, the Applicant's Alternative would reduce the air quality, noise, and traffic impacts of the construction period by almost half a year (from 29 to 24 months).
6. By replacing one of the two planned underground garages with surface parking, the Applicant's Alternative would reduce the likelihood of storm water run-off into other properties. This would be especially important should conditions outstrip the "25-year storm event" referenced by the DEIR.

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(B) Additional recommendations for improving the Applicant's Alternative

7. Circulation: The DEIR is sensitive to a number of serious problems caused by the project's location on one of the city's busiest traffic corridors. Indeed, following recommendations of the Upper State Street Study, the traffic consultant opposes left turns into the residential driveway and the DEIR proposes combining the respective driveways leading to the residential and to the commercial parking areas into a Single Driveway Alternative. It is further suggested that the resulting single driveway be located as far as practicable from the State/Hitchcock intersection, in part to increase the usefulness of a possible extension of the present left-turning lane into Hitchcock Way. We support the Single Driveway Alternative, especially if the access is located between the two presently proposed sites for the separate driveways because one of them would be too close to the driveway serving the AAA parking lot. The DEIR notes that the proposed elimination of one driveway would lead to the loss of some shared parking spaces. Coupled with the elimination of the residential garage's dozen or so ill-designed or tandem parking spots discussed in the DEIR, the Single Driveway Alternative may thus make a slight reduction in the number of residential units highly desirable.
8. Recreation: The EIR mentions the problematic distance (more than the recommended half a mile) between the project site and the nearest neighborhood parks. Two recent ABR concept reviews, reproduced as Appendix D in the Staff Report, also commented on the need for more and better-utilized open space. Given that the majority of the proposed 73 condominiums are intended to have two or three bedrooms (14 and 41, respectively), the lack of sufficient active open space for adults and especially for children and adolescents will prompt more car trips than desirable. We urge the provision of at least one small playground and at least one public basketball hoop as far as possible from State Street traffic and the transformation of one condominium into a community facility for friendly gatherings, child daycare, and after-school activities.

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9. Tree protection: At present, the site is home for one of the very few "urban forests" in the uptown business district. Rather than acquiesce into the removal or risky transplantation of most or all of the 210 listed mature trees, we welcome the EIR consultant's "Retain Front Setback Trees Alternative" even though removing all trees from the site could enlarge some view corridors toward the Santa Ynez Mountains. We urge the judicious weighing of pros and cons in deciding about the fate of individual trees and, other things being equal, the retention of vegetation with beneficial impact on air quality.

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10. The EIR strikes us as less insightful in addressing, or by not addressing, areas of concern covered in this and the next two paragraphs. Despite pertinent current discussions about the Inclusionary Housing Ordinance, the DEIR fails to recognize that it is not only the commercial component of the redevelopment proposal that would generate jobs and add to the number of commuters. Especially the 62 market-rate units, but even the 11 middle-income affordable units, must be considered job generators which would deteriorate rather than improve the city's current jobs/housing imbalance and enhance the adverse environmental impact of that imbalance.

6

11. In assessing the potential impact of the proposed redevelopment on the city's natural and infrastructural resources, the DEIR seems to ignore that Santa Barbara's daily influx of nonresident population oscillates between 40,000 and 100,000 people (see the City's Conditions, Trends, and Issues report of August 2005, p. 152 of 350). We believe that the high and increasing number of tourists and commuters should have been taken into account in the cumulative analysis of the city's present and likely future demand for public facilities (water supply, waste water, solid waste disposal, utilities) and public services (police, fire protection, parks, etc). Likewise, the actual size of the "day time" plus resident population should have been considered in any analysis, now absent, of emergency services and our road capacity for evacuations.

7

12. Last but not least, a more realistic EIR would not ignore the recently enhanced strain on our natural and infrastructural resources by such factors as the decreasing availability of state water, the increased siltation of local lakes and reservoirs, and the increasing year-round wild fire danger apparently due to climate change. In light of the considerations advanced in this and the five previous paragraphs, we urge the re-examination of the 3.52-acre residential parcel's unacknowledged density of about 21, mostly multi-bedroom, units per acre.

8

Conclusion: The problems associated with the Applicant's Alternative noted above are far less troublesome than the problems associated with the original Project. In fact, we believe that most of the remaining problems could be easily resolved if the allowable residential density of the Applicant's Alternative had been calculated on the basis of the 3.52-acre parcel which is to be actually occupied by the residences (rather than the 4.58-acre area consisting of two separate parcels which are to be respectively occupied by the redevelopment's residential and commercial components). The resulting lower density and greater environmental sustainability might indeed yield an attractive redevelopment welcome to its neighborhood and an asset to the entire city.

9

We thank you in advance for your consideration.

For the South Coast Land Use Committee,

Paul Hernadi
South County Vice President
Citizens Planning Association

Comment Letter No. 3, Citizens Planning Association, May 10, 2009

Response 3-1

The commenter also states a preference for the applicant's alternative over the proposed project. Comment is noted and no response is required.

Response 3-2

For purposes of the EIR, the applicant's alternative was considered at the same level of analysis as the proposed project. The EIR does not make recommendations of one project over another as this is the discretion of the decision making bodies. The comment notes several advantages of the applicant's alternative over the proposed project. These comments are noted.

Response 3-3

The EIR provides a discussion of the potential impacts and concerns associated with driveway spacing/location. As identified in EIR section 7.7.1, the driveway spacing as proposed is acceptable and would not result in any significant environmental impacts.

The commenter expresses a preference for the single driveway alternative which was evaluated in the EIR, and further recommends that this driveway be located as far as practicable from the State/Hitchcock intersection. This comment will be provided to decision makers. No further response is required.

Response 3-4

The City does not currently have adopted standards for proximity of residential development to parks. While both the proposed project and the applicant's alternative would increase the residential population at the project site, as noted in the Initial Study, existing parkland within the City would be adequate to serve these residents.

Also see **Response 2-3**.

Response 3-5

As discussed in the Draft EIR, the proposed project and applicant's alternative would require the removal or relocation of most of the mature trees within the project site. In a comment letter submitted in response to the Draft EIR (see comment letter No. 15), the applicant has indicated that most of these mature trees would be retained as part of the landscaping for either the proposed project or the applicant's alternative.

Response 3-6

See **Response 2-4**.

Response 3-7

The analysis of potential impacts to public services in the Initial Study prepared for the proposed project was based on the City's *Conditions, Trends, and Issues* report referenced in this comment.

As noted in the Initial Study, the project site is located in an urban area where all public services are available. In 2005, the City prepared a *General Plan Update: 2030 Conditions, Trends, and Issues* (CTI) Report (September 2005) that examined existing conditions associated with fire protection, police protection, library services, public facilities, governmental facilities, electrical power, and natural gas. The CTI Report specifically analyzed whether there were deficiencies existing or anticipated for each of the public services. The CTI report determined that police and fire protection services, and library services are being provided at acceptable levels to the City. In addition, the CTI Report determined that electricity, natural gas, telephone, and cable telecommunication services are being provided at acceptable service levels and utility companies did not identify any deficiencies in providing service in the future. Finally, the CTI Report determined that demand for City buildings and facilities will continue to be impacted by growth, although no appropriate/acceptable levels of service have been established.

As discussed in the Initial Study, the project site is located in an urban area and involves the demolition of existing buildings and construction of new buildings in its place. Because the existing buildings already utilize existing public services, the project would be served with connections to existing public services for gas, electricity, cable, and telephone traversing the site, as well as access to existing roads. The project is not anticipated to create a substantially different demand on fire or police protection services, library services, or City buildings and facilities than that anticipated in the CTI Report.

The CTI Report examined existing conditions associated with water supply, treatment, and distribution system, and specifically analyzed and determined that there were no existing or anticipated deficiencies for the next 20-year planning period.

As stated in the Initial Study, increased sewage treatment associated with the project can be accommodated by the existing City sewer system and sewage treatment plant, and would represent a less than significant impact.

As noted in the Initial Study, the County's threshold for project specific impacts to the solid waste system is 196 tons per year (this figure represents 5 percent of the expected average annual increase in solid waste generation [4,000 tons per year]). Source reduction, recycling and composting can reduce a project's waste stream by as much as 50 percent. If a proposed project generates 196 or more tons per year after reduction and recycling efforts, impacts would be considered significant and unavoidable. The existing use is estimated to generate 90.4 tons per year of solid waste, and the proposed project would generate an

estimated 268.58 tons. Therefore, the net solid waste generation of the project would be 178.18 tons per year, which is less than the threshold of 196 tons per year. With application of source reduction, reuse, and recycling, landfill disposal of solid waste could be reduced by 50 percent to 89.09 tons per year.

Proposed projects with a project specific impact as identified above (196 tons per year or more) would also be considered cumulatively significant, as the project specific threshold of significance is based on a cumulative growth scenario. However, as landfill space is already extremely limited, any increase in solid waste of 1 percent or more of the expected average annual increase in solid waste generation [4000 tons per year], which equates to 40 tons per year, is considered an adverse cumulative impact.

The Initial Study concluded that impact related to public facilities (water supply, waste water, solid waste disposal, and utilities) and public services (police, fire protection and parks) would be less than significant with the implementation of waste reduction mitigation requiring the implementation of a recycling program for the hotel portion of the proposed project and the development of a waste management plan to reduce waste generated during demolition and construction.

Response 3-8

The City's 2005 Urban Water Management Plan (UWMP), provides water supply estimates, which include growth projections and a margin of safety.⁶ As discussed in the Initial Study and noted in the UWMP, the City's water supply is diverse, probably as diverse as any municipal water supply in California, and perhaps in the nation. The City's supplies are provided by both surface and groundwater sources, as well as recycled water, water from the State Water Project, and desalination efforts. The UWMP determined that the City's water supply is adequate for the foreseeable future. Additionally, the City continues to maintain an active and progressive water conservation program as discussed in the UWMP. Finally, the City Council has an adopted Drought Contingency Plan which has been updated as part of the current UWMP to reflect that water shortage may be induced by factors other than climatic drought.

Recent events may have impacted supplies, but no determination has been made that supplies are inadequate to meet the UWMP demand growth forecast.

Response 3-9

The commenter believes that the residential density calculations should be based solely on the residential component of the proposed project (3.24 acres, or 3.52 acres for the applicant's alternative), rather than the entire 4.58-acre project site. (Through project review, this issue has also been referred to as a "transfer

⁶ City of Santa Barbara, *Urban Water Management Plan*, (2005) <http://www.santabarbaraca.gov/NR/rdonlyres/3F63EF5F-4F45-4642-AD32-293E67BB7A10/0/UWMP2005.pdf>.

of development,” not to be confused with the official Transfer of Existing Development Rights (for non-residential development) requested by the applicant for the proposed project.) The project site is comprised of two parcels, and the project includes a lot line adjustment to separate the commercial portion of the project from the residential portion. Early on in density discussions with the applicant, City staff determined that using the entire site to determine density was appropriate because the development is essentially a mixed-use development of the entire site. The applicant could have proposed to merge the two lots and create a condominium parcel for the commercial component of the project, in which case density would not be an issue. Therefore, staff determined that, as long as future development of residential uses was prohibited on the commercial parcel, the end result in terms of total allowable square footage and residential density for the entire project site is the same.

Essentially, calculating density utilizing the entire project site results in 19 additional units for the proposed project, or 15 additional units for the applicant’s alternative, compared to utilizing only the proposed residential parcel for the density calculation. Staff continues to support using the entire project site to determine density, because the applicant could easily revise the project to be include a lot merger, rather than a lot line adjustment, at which point this discussion becomes moot. With the restriction on future residential development on the commercial parcel, the end result (maximum number of units permitted) would be the same. Nevertheless, the Planning Commission has the ultimate authority in determining the appropriate density.

Julie – Could you please forward the following comments to the Planning Commissioners as soon as possible, so that they have time to review them? Also, please be sure that a copy gets to Brent Daniels the applicant’s representative. I don’t want him to be taken by surprise.

EIR Public Hearing and Concept Review of Sandman Inn Proposal

My main concern with the staff report and the DEIR is with the characterization and analysis of the buffer overlay strip which is indicated on the existing General Plan Land Use Element. Staff seeks guidance from the Commission as to whether the Commission considers the analysis to be adequate and agrees with the conclusions represented by staff.

The need for a physical buffer zone on the property:

I do not agree with either the level of analysis or the conclusions at this point for a number of reasons. From an analytical point of view, the Draft EIR does not provide a sufficient amount of analysis because it does not scale the location of the buffer from the Land Use Map to either the tentative subdivision map or the development plan. This is necessary to support the conclusions of the EIR that commercial land uses lie on one side of the buffer and residential uses lie on the other side. My preliminary analysis of this indicates that the buffer is considerably south of the zone boundary between R-4 and C-2, which brings into question the underlying assumption of the staff that this is a separation buffer rather than a physical buffer.

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Secondly, the EIR refers to the function of the green-colored “buffer” as a tool for buffering or transitioning commercial and residential land uses from one another. This interpretation, both in the staff report and in the EIR, fails to acknowledge that a buffer zone is actually a physical area or strip of land. (Various real estate and planning reference sources define a buffer as “An area of land specifically designed to separate one zoning use from another, such as separating a residential neighborhood from an industrial area” or “A strip of land created to separate and protect one type of land use from another; for example, as a screen of planting or fencing to insulate the surroundings from the noise, smoke, or visual aspects of an industrial zone or junkyard”). Even the City’s own Zoning Ordinance refers to a buffer as having the attributes of both size and location. This, coupled with the green coloring of the map designation, and its classification as a Recreation and Open Space designation on the Land Use map clearly reflect the intent as being more than simply transitional, but rather a physical area or strip of land dedicated to open space or recreation.

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For these reasons, staff’s analysis and that of the Draft EIR must be considered incomplete and misleading if it simply states that buffer was intended to be interpreted to be a separation line between residential and non-residential land uses.

Once the EIR accurately maps the location of the open space buffer on the project’s maps, only then can conclusions be rendered whether the proposed land uses are consistent with both the actual intent and letter of the General Plan, not just presumed intent. Just because the text of the Land Use Element might be silent on the purpose of the open space buffer overlay zone doesn’t mean that its existence on the map can be ignored. If a buffer zone designation is determined to traverse the site, which it does, then the project must either provide such a meaningful linear buffer through the site, or its equivalent, or propose a General Plan Amendment to the land use map to either eliminate or

6/2/2009

relocate the buffer designation. As currently conceived, the plan is inconsistent with the physical location of the buffer overlay and its subdivision map cannot be approved because of this fact.

At the last hearing on this project, I offered this perspective and staff was unwilling or unable to provide more than a cursory response. I bring this issue up again because along with annexations, a general plan amendment is one of the most significant land use decisions made by a City, and as a result, requires a super majority and findings of “living within our resources”. I continue to believe that avoidance of such consideration renders the EIR fatally flawed because it misrepresents the project and its discretionary approvals necessary. Finally, this issue begs the question of articulating a design alternative to the proposed project that would not require the removal or relocation of the open space buffer.

2

Thank you for the opportunity to provide this comment. I am sorry that I will not be able to attend the meeting in person.

John

John C. Jostes, AICP
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Facilitating productive dialogue on environmental and public policy issues in California and the West

6/2/2009

Comment Letter No. 4, John C. Jostes, May 11, 2009**Response 4-1**

The comment addresses the conclusions regarding the “Buffer” land use designation and the lack of analysis contained in the EIR, specifically the fact that there is no mapping of the “Buffer” designation in the EIR. Two new figures, **Figure 5.0-3, Land Use Map with Project Site Overlay**, and **Figure 5.0-4, Project Plan with Buffer Designation**, have been provided in **Section 5.0, Land Use and Policy Consistency**. **Figure 5.0-3** shows the project boundary and zoning as an overlay on the General Plan Land Use Map. **Figure 5.0-4** shows the site plan for the proposed project, with the site zoning and the approximate location of the Buffer designation indicated. Both figures show that the Buffer/Stream designation is located approximately 20 to 30 feet south of the division between the C-P and R-3/R-4 zones. As illustrated, both the proposed project and the applicant’s alternative would develop residential uses in areas designated as Buffer/Stream in the Land Use Map. Additional consideration of the implementation of the Buffer designation has been provided in **Section 5.0, Land Use and Policy Consistency**, of the Final EIR. Additional discussion of the Buffer designation is provided in **Response 4-2** below.

Response 4-2

An expanded discussion of the Buffer designation has been added to **Section 5.0, Land Use and Policy Consistency**, of the Final EIR.

The Buffer designation is provided on the City’s Land Use Map.⁷ The General Plan does not provide a definition of the Buffer/Stream designation. However, according to the Local Coastal Plan,

*The purpose of this classification is to signify the need for a separation between potentially conflicting uses or an area of transition between land uses not directly compatible.*⁸

Based on this definition of the Buffer designation, a physical separation would be required when adjacent uses, such as commercial and residential development, directly abut each other. Within the proposed project site, as shown in the Land Use Map (**Figure 5.0-1**), the Buffer designation separates the General Commerce/Offices area from the Residential-12 units per acre area. Based on the information currently available, the Buffer designation may be interpreted as indicating an area of unspecified dimensions between planning areas, or as a line of demarcation between incompatible uses.

The City’s Zoning Ordinance and Map, which implement the land use designations provided in the general plan, do not contain a Buffer zone. It would appear that the Zoning Ordinance implements the

⁷ City of Santa Barbara, Land Use Map, adopted by the City Council April 22, 1975.

⁸ *Ibid*, *Local Coastal Plan*, (2004) 207.

needed separation between incompatible uses specified by the Buffer through the establishment of setback requirements. As shown in **Figure 5.0-4, Project Plan with Buffer Designation**, the Buffer area follows a similar alignment to the border between the CP and R-4/R-3 zoning designations.

The proposed project and the applicant's alternative include both residential and commercial development. These uses are physically separated by the 6-foot interior setbacks required by Section 28.21.060 of the zoning code, and are further separated by the interior driveway and turnaround plaza, parking areas, and open space areas. Specifically, residential uses in the northwestern portion of the site are separated from commercial uses in the southwestern portion of the site by setbacks that exceed zoning code requirements, and by shared open space areas that roughly correspond to the location of the Buffer designation. Where development occurs in Buffer-designated areas, such as the residences in the eastern portion of the site, the adjacent uses are compatible. This is consistent with the general pattern of development along the Buffer corridor north of State Street, in which residential development to the north of the Buffer is separated from commercial uses to the south not by an undeveloped open space area but by implementation of setback requirements in the zoning code.

If the Buffer designation is interpreted as requiring an open space area in the specified location, the proposed project and the applicant's alternative would be inconsistent with the Land Use Map, as both would locate residential development in areas with the Buffer designation. If the Buffer designation is interpreted as requiring only the separation of incompatible uses, the proposed project and the applicant's alternative would be consistent with the Land Use Map, as the proposed commercial uses would only be located south of the buffer, and only residential uses would be located north of the buffer. Additionally, the proposed commercial uses would be adequately separated from proposed residential uses by access driveways and open space areas. The Planning Commission will ultimately determine whether either the proposed project or the applicant's alternative is consistent with the General Plan land uses designations, or whether a General Plan amendment would be required.

Allied Neighborhoods Association

May 12, 2009
Re: Sandman Project DEIR

Planning Commissioners
Community Development Department Planning Division
630 Garden St.
Santa Barbara, CA 93101

Dear Planning Commissioners:

Allied Neighborhoods Association is pleased with the direction of the improvements in going from the first (the three-story hotel plus 73 residential condos) to the second (two two-story office buildings plus 73 residential condos) proposal for the Sandman redevelopment. Nonetheless, we think that the latter project could be even better with a few changes.

1

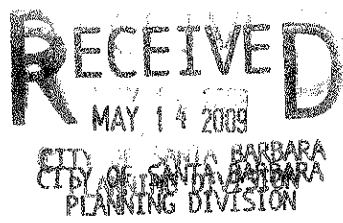
The reduction in height and bulk of the commercial segment has done much to lessen the impact of this development and to retain the existing mountain views, which, as the Upper State Street Study concluded, are such a valuable part of the ambience of the area. However, we are still concerned with the impact of the residential segment of the project on the jobs/housing imbalance. The reduction in the commercial square footage helps, but the market-rate condominium units are also detrimental to the jobs-housing imbalance. Some reduction in residential density could provide open space for those living there, as well as reduce the strain on water, sewer, and other resources. Adopting the DEIR's Single Driveway Alternative and locating the driveway between the sites of the two driveways now proposed would ensure greater distance from both the State/Hitchcock intersection and the driveway serving the large AAA parking lot.

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In conclusion we applaud the direction of the proposed changes represented by the second proposal but think that further reductions in the scale of the project would make it even better. Thank you for your consideration.

Judith Dodge Orias, president
Allied Neighborhood Association



Comment Letter No. 5, Allied Neighborhoods Association, May 12, 2009

Response 5-1

The commenter states a preference for the applicant's alternative over the proposed project. The comment is noted and no response is required.

Response 5-2

See **Response 2-4** for jobs/housing information.

See **Response 3-7** for information on public services.

Response 5-3

The EIR provides a discussion of the potential impacts and concerns associated with driveway spacing. As noted previously (see **Response 2-2**), the driveway spacing as proposed is acceptable and would not result in any significant impacts.

-----Original Message-----

From: Judy Orias [mailto:judy.orias@verizon.net]
Sent: Friday, May 15, 2009 7:32 AM
To: DeBusk, Allison L.
Subject: Sandman comments

Hi, In addition to the written comments that were submitted by Allied Neighborhood Assoc. I also made some personal comments regarding issues that became apparent during the hearing. Since I spoke during the comment period regarding the projects I would also like the personal comments to be considered in the EIR review. These comments are:
Retaining runoff on the site. The city has a history of not considering the runoff from projects and as a result the flood zones downstream have increased in size resulting in homes being required to buy flood insurance. The first cost was \$40.00 is now over \$1,000.00 and can be increased at any time without the option of appeal. The Hidden Valley area is an example of this situation, the box culverts under 101, Modoc and the railroad tracks are inadequate for the 100 year flood and result in flooding coming across the freeway and into our area. Since replacement of the box culverts will be very difficult the option of requiring projects to retain their runoff on site is right now the only option. I urge you to include this situation and a requirement in the conditions of approval to address this problem.

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The other point that I raised is the need for a play ground on the site. The city cannot regulate who will live in these units and in all probability since there are multi bedrooms there will be children. The nearest playground is over a mile away and not readily available for small children. There would have to be adult supervision as well as assistance in traveling to those sites. There is a need for some area where small children can play. It is important that proposed projects have a margin of potential to address the needs of the residents change. Once the project is built it will be there for many years.
What is thought to be adequate for today in the future may be inadequate thus planning requires a balance of addressing today desires and recognizing that times change. A play ground is an important item which allows for present as well as potential future changes in the needs of the residents.

2

Thank you Judy Orias

Comment Letter No. 6, Judy Orias, May 15, 2009

Response 6-1

This comment expresses concern about the potential for stormwater runoff affecting lower elevations.

As noted in the Initial Study, topography of the site is generally flat, sloping gently south towards State Street. The project site is not located within the 100 year flood plain as shown on the Flood Insurance Rate maps. Additionally, the Initial Study notes that the closest creeks to the project site are Arroyo Burro Creek and San Roque Creek, located approximately 205 feet to the west and 210 feet to the east, respectively. The two creeks converge approximately 1,000 feet southwest of the site, near Hope Avenue. The site is within the Arroyo Burro Creek watershed. Drainage from the site sheet flows to the south.

As stated in the Initial Study, drainage from the site sheet flows in a southerly direction down the existing driveway to State Street, at which point it flows in a westerly direction via curb and gutter towards drainage inlets that eventually convey runoff to Arroyo Burro Creek. A Preliminary Drainage Analysis prepared by Flowers & Associates, Inc., dated April 27, 2006, indicates that runoff from the site in a 25-year storm event would increase by 0.90 cubic feet per second following construction of the project. An underground collection system is proposed to reduce the increase in peak flow, and corresponding overall drainage volume, to pre-project levels. Thus, the Initial Study determined that there would be no net increase of runoff and impacts would be less than significant. Additionally, the project is required to comply with the City's Storm Water Management Program, which requires that there be no increase in storm water runoff compared to existing conditions, and that the water from a one-inch, 24-hour storm be retained on site.

Response 6-2

See **Response 2-3**.

From: r adawi [mailto:rhondaadawi@hotmail.com]
Sent: Tuesday, May 12, 2009 6:09 PM
To: Community Development PC Secretary
Cc: DeBusk, Allison L.
Subject: CITIZEN CONCERN ABOUT SANDMAN INN REDEVELOPMENT

RE: Sandman Inn Redevelopment
TO: Planning Commission
CC: Allison DeBusk
DATE: May 12, 2009

Dear Planning Commissioners:

I am writing to voice my concern about the Sandman Inn Redevelopment project. I have lived in the San Roque area for over 17 years and am a 10-year resident of the Franciscan Villas off of Hitchcock Way. It is a wonderful neighborhood but it is being threatened by too many new construction projects.

I am very concerned about the impact of traffic, noise and safety to pedestrians based upon the prior approval of the construction of Whole Foods. I don't think an adequate study was conducted to see the detrimental effect of additional traffic in the neighborhood. If the Sandman Inn redevelopment goes forward, I am afraid that the results would be catastrophic to an already congested Upper State Street.

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Much of the neighborhood's charm is in the beauty of the area. Although I was not happy to live so close to the mountains during the Jesusita fire last week, my mountain view is normally lovely and a large part of the property value of my home. I fear that this Sandman redevelopment would block my mountain view causing my property value to plummet.

2

I am also concerned about the impact of this proposed dense project on such limited resources as water, clean air, sewer service, public safety including fire protection, and road capacity. Many children live in this neighborhood and the increased traffic would be especially dangerous. Pedestrian children from the YMCA may be injured in traffic.

3

Also, the Rancho Franciscan's Senior Housing could be impacted detrimentally. Many of the seniors are pedestrians who would be in danger with an influx of even more traffic on an already congested Hitchcock Way.

4

1.
Please maintain the safety of my neighborhood and do not permit the Sandman Inn redevelopment project to proceed. Thank you in advance for your consideration and careful review of the proposed project.

Sincerely,
Rhonda Adawi
Santa Barbara, CA 93105
rhondaadawi@hotmail.com

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Comment Letter No. 7, Rhonda Adawi, May 12, 2009**Response 7-1**

The EIR considered a number of projects as noted in the Cumulative Scenario (see **Section 4.0** of the Final EIR). The Whole Foods project (identified as project 44 in **Table 4.0-1**) was considered in the Traffic Impact Analysis prepared for the proposed project, provided as **Appendix 7.0**.⁹

As discussed in the EIR, the proposed project would result in 215 fewer daily trips, 5 fewer PM peak hour trips, and 25 additional AM peak hour trips, and the applicant's alternative would result in 852 fewer daily trips, 33 fewer PM peak hour trips, and 5 fewer AM peak hour trips as compared to existing conditions. As shown in **Tables 7.0-7** and **7.0-9**, the intersection of State Street and Hitchcock Way would operate at LOS A in the AM peak hour and LOS C in the PM peak hour under future and cumulative conditions. These levels of service meet City standards for intersection operation, and the project-related increases are not significant. Therefore, either the proposed project or the applicant's alternative would result in less than significant project-related and cumulative traffic impacts on State Street and at area intersections and roadways. Based on the overall reduction of traffic and, in the case of the proposed project, the less than significant increase in AM peak-hour traffic, impacts to pedestrian safety would be less than significant.

Response 7-2

The EIR considers potential impacts to views from public viewing places, rather than from private property. As discussed in the EIR, both the proposed project and the applicant's alternative would partially obstruct views of the mountains; however, the removal of existing landscape trees would open up currently obstructed views. Portions of the proposed project (hotel portion) would obstruct views of the Santa Ynez Mountains from key locations (most importantly, the Hitchcock Way and State Street intersection). However, due to the creation of a view corridor and the removal of vegetation that currently blocks views, this change is considered adverse, but less than significant in terms of environmental thresholds. The loss of mountains views by the proposed project's residential development would not be considered significant. The applicant's alternative (both the office and residential components) would change views of the mountains; however, due to the creation of a view corridor and the removal of vegetation that currently blocks views, this change is not considered significant in terms of environmental thresholds. Impacts are considered adverse but less than significant for both the proposed project and the applicant's alternative with regards to the loss of scenic views.

Response 7-3

See **Response 3-7**.

⁹ Iteris, Inc., *Sandman Inn Redevelopment Project Traffic Study, Santa Barbara, California*, March 2009.

Response 7-4

This comment expresses concern about pedestrian safety as a result of potential traffic increases. As discussed in **Response 7-1**, the proposed project and the applicant's alternative would generally reduce the number of trips to and from the project site, and would have less than significant traffic impacts. The proposed project and applicant's alternative, as shown in **Tables 7.0-7** and **7.0-9**, would result in less than significant traffic increases at the intersection of State Street and Hitchcock Way, and levels of service at this intersection would remain at acceptable levels. As shown in **Figure 7.0-2, Project Traffic Directional Distribution**, 85 percent of the trips generated by the proposed project would be distributed to Highway 101 and State Street. Very few trips would be generated along Hitchcock Way. The Rancho Franciscan Senior Apartments are located approximately 0.25 mile south of the project site on Hitchcock Way. Given the overall reduction in traffic as a result of the proposed project, and the fact that most of the trips from the project site would use other area roadways, pedestrian safety on Hitchcock Way is not expected to be adversely impacted. Furthermore, as discussed in the Initial Study prepared for the proposed project, the sidewalk adjacent to the project site would be widened from its existing 4 feet to 8 feet with an additional 4-foot parkway, improving pedestrian circulation adjacent to the project site.



Our vision Clean Air

**Santa Barbara County
Air Pollution Control District**

May 12, 2009

Allison De Busk
Associate Planner
City of Santa Barbara
Planning Division
P.O. Box 1990
Santa Barbara, California 93102-1990

RECEIVED
MAY 14 2009
CITY OF SANTA BARBARA
PLANNING DIVISION

Re: 3714-3748 State Street, "Sandman Inn Redevelopment Project": DEIR

Dear Allison:

The Santa Barbara County Air Pollution Control District (APCD) has reviewed the Draft Environmental Impact Report (DEIR) for the above-mentioned project. The proposed project involves:

- 1) Demolition of the existing 113-room Sandman Inn hotel, adjacent restaurant and all site improvements.
- 2) Construction of either:
 - Proposed Project: construction of a 106-room hotel and 73 residential condominium units. This would include a total of 291 parking spaces with 1 at-grade and 100 underground parking spaces for the hotel component, 163 underground parking spaces for the residential component, and 17 at-grade common/shared spaces; or
 - Applicant's Alternative: construction of approximately 14,254 square feet of office space contained in two buildings and 73 residential condominium units. This would include a total of 237 parking spaces with 66 parking spaces (61 spaces at-grade and 5 spaces underground) for the office component, 162 underground parking spaces for the residential component, and 9 at-grade common/shared spaces.
- 3) Construction of a new driveway access from the Town & Country Apartments to San Remo Avenue, necessitating demolition of an existing residential unit.

We have the following comments on the air quality discussion in the DEIR:

- 1. We note that responses to the Notice of Preparation for this DEIR brought up concerns regarding introducing residences in close proximity to the Sate Street corridor. However, the DEIR is surprisingly silent on this issue. While the APCD does not require

1

Terence E. Dressler • Air Pollution Control Officer
260 North San Antonio Road, Suite A • Santa Barbara, CA • 93110 • www.sbapcd.org • 805.961.8800 • 805.961.8801 (fax)

an analysis of public health risks for this project, the DEIR, as a full disclosure document, should address this issue or state why the issue is not discussed.

1

2. Page 6.0-5: The DEIR states that the 2004 Clean Air Plan (CAP) is the applicable regional plan. Please note that the 2007 CAP has been adopted by the SBCAPCD Board; incorporated into the State Implementation Plan by the California Air Resources Board, and is going through the federal approval process. For the purposes of determining project consistency the 2007 CAP is the most recent plan that should be used.

2

3. The project must comply with all Rules and Regulations required by the Santa Barbara County APCD, including, but not limited to:
- Compliance with APCD Rule 339, governing application of cutback and emulsified asphalt paving materials;
 - Obtaining required APCD permits for emergency diesel generators or any individual (or grouping) of boilers or large water heaters with a rated heat over 2.0 million BTUs per hour (MMBtu/hr). Depending on the size of the individual unit, the unit must comply with the requirements of APCD Rule 360 or Rule 361.

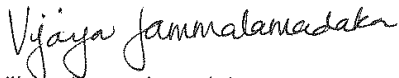
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4. Under Construction Impacts, please note that the project will involve demolition or renovation of existing structures which may release regulated friable asbestos. Friable asbestos crumbles into a dust of microscopic fibers that can remain in the air for long periods of time. If inhaled, they pose a serious health threat as asbestos fibers can become permanently lodged in body tissues. Since there is no known safe level of exposure, all asbestos exposure should be avoided. This is particularly important when removing asbestos insulation. Pursuant to APCD Rule 1001 – National Emission Standards for Hazardous Air Pollutants (NESHAPS) – Asbestos, even if the building does not contain any asbestos, the project proponent is required to complete and submit an APCD Asbestos Demolition and Renovation Compliance Checklist (available on the APCD website, www.sbcapcd.org) at least 10 working days prior to commencing any activities on the buildings.

4

We look forward to receiving the Final EIR.

Sincerely,



Vijaya Jammalamadaka
Air Quality Specialist
Technology and Environmental Assessment Division

cc: TEA Chron File
City of Santa Barbara – Sandman Inn Project file

Comment Letter No. 8, Santa Barbara County Air Pollution Control District, May 12, 2009

Response 8-1

The comment notes that the issue of the project's close proximity to the State Street corridor (as raised by Citizen's Planning Association in their June 8, 2008 letter; see **Appendix 2.0**) was not addressed in the EIR.

The proposed project and applicant's alternative would locate residential condominiums along State Street with the nearest units being approximately 30 feet from the street in the proposed project and 90 feet from the street in the applicant's alternative. State Street is designated in the City's Circulation Element as a principal arterial roadway between Hollister Avenue and De La Vina Street.

The California Air Resources Board (CARB) published its *Air Quality and Land Use Handbook* in 2005, in which its policy recommendation is that sensitive land uses not be sited within 500 feet of a highway, urban road (100,000 vehicles per day), or rural road (50,000 vehicles per day).¹⁰ The average daily trips along State Street west of Las Positas Road range from 24,400 to 30,800. This is well below the identified standards. Additionally, the SBCAPCD, in their June 2008 memorandum states, "No other roadways [besides Hwy 101] in Santa Barbara County currently have estimated traffic volumes at the magnitude for which the proximity studies have identified adverse health effects."¹¹ Therefore, potential public health risks associated with the location of residential units near the State Street corridor is not considered significant.

Response 8-2

The noted change has been made in the EIR.

Response 8-3

Compliance with these requirements has been added to the EIR as mitigation.

Response 8-4

The comment notes that asbestos containing materials (ATM) may be present in buildings to be demolished. As such, the possibility of friable asbestos or ATM may be emitted into the air during demolition activities. Compliance with the requirements for assessing and reducing potential hazards from asbestos or ATMs during demolition has been added to the EIR as mitigation.

¹⁰ California Air Resources Board, *Air Quality and Land Use Handbook: A Community Perspective*, (2005) 7.

¹¹ Terry Dressler, Santa Barbara Air Pollution Control District, Memorandum "RE: Public Health and High Traffic Roadways," June 2008.

From: Ms VIRGINIA PETERSON [mailto:ginpyt36@verizon.net]
Sent: Wednesday, May 13, 2009 2:57 PM
To: DeBusk, Allison L.
Cc: Paul Hernadi
Subject: Sandman Inn Redevelopment

Allison DeBusk:

After reading about the original project and the alternative project on above subject, we believe they are not conducive to the surrounding areas. This area has lots of traffic already. Another thing is why do we need more condos? People are losing jobs and leaving Santa Barbara. Many homes and condos are for sale. The scale of the projects are too large. More resources would be used and some of our views obstructed. We have a suggestion. Why not create a park?

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Also with the Whole Foods construction project adjacent on State and Hitchcock Way, the traffic will be a nightmare during the building process.

We live right off Hitchcock Way close to State Street and foresee difficulty leaving and entering our home. Also, the YMCA is located on Hitchcock Way and many businesses and residences.

P.S. If we really need condos then why are the Chapala condos vacant?

Thank you. Jim and Ginger Peterson

Comment Letter No. 9, Jim and Ginger Peterson, May 13, 2009

Response 9-1

The commenter's opposition to the proposed project and applicant's alternative is noted and will be forwarded to decision makers.

Response 9-2

As discussed in the EIR, the proposed project would result in 215 fewer daily trips, 5 fewer PM peak hour trips, and 25 additional AM peak hour trips, and the applicant's alternative would result in 852 fewer daily trips, 33 fewer PM peak hour trips, and 5 fewer AM peak hour trips as compared to existing conditions. Level of service calculations for area intersections are provided in **Tables 7.0-2, 7.0-7 and 7.0-9** of the EIR.

Response 9-3

This comment makes an observation regarding jobs and housing and does not raise issues related to the adequacy or completeness of the EIR. The comment will be forwarded to decision makers. No further response is required.

Response 9-4

As discussed in the EIR, while both the proposed project and the applicant's alternative would adversely affect scenic views, these impacts would be less than significant. See **Response 7-2**. Regarding use of resources, see **Response 3-7**.

Response 9-5

The project site is designated for development under existing zoning. As discussed in the Initial Study, the City currently has 1,800 acres of natural open space, park land, and other recreation facilities. Additionally, a reasonable range of alternatives that would meet most or all of the project objectives, as required by CEQA, were evaluated. Development of a park on the project site would not meet any of the project objectives.

Response 9-6

Whole Foods is currently making tenant improvements in order to occupy the space formerly occupied by Circuit City. The larger "Whole Foods Project" referred to in this letter, and considered in the EIR under cumulative impacts, is currently on hold. Because tenant improvements for Whole Foods are currently underway, development within the proposed project site would be unlikely to overlap with construction of the Whole Foods project. See **Response 7-1**.

Response 9-7

As discussed in the EIR, the proposed project would result in 215 fewer daily trips, 5 fewer PM peak hour trips, and 25 additional AM peak hour trips, and the applicant's alternative would result in 852 fewer daily trips, 33 fewer PM peak hour trips, and 5 fewer AM peak hour trips as compared to existing conditions. Impacts to the intersection of State Street and Hitchcock Way were analyzed and found to be less than significant. See **Response 7-4**.

Transcript of handwritten letter

May 13, 2009
650 Miramonte Dr.
Santa Barbara, Calif. 9310

Re: 3714-3744 3730 State St. 3715 San Remo Dr.
Please read at the hearing site 5-14-09
Be well

Dear Planning Comission,

The Sandman Inn is a Primitive Nature Preserve, full of Native American Burial Ground. It is picturesque. Lovely garden, full of Indians making Peace Baskets. Save it. The walls recuperated from the last fire. Leave all intact and Be Well. The project is erroneous. The splendid garden is full of Native American Holy People. They attend [mass?] and go to work and school. They put out the fires as much as possible. The water is much in the exquisite garden. All was helped by the butterfly collection at the Natural History Museum. Those insects died for science. Don't kill off the Holy People in this splendid walking place and garden. All are wearing green for St. Patrick's Day. They help the fires to be put out—all of them. Never forget to save S-B. Never ever have grading here. Substantial Historic Value needed to be established. It was. It was Treasured and cared for. Never ever demolish the Sandman Inn. It is off the road, not monstrous. Many people can see the vegetation from the road. It does not impede the view if it is never built. Open your eyes. See the spect[re] of tragedy. It would be a horrible building. View would be obstructed. 45' and 31' is too high—incredibly high. Never demolish. It is totally unecological—you lose everything. The grading is [incomparable?]. Never ever have underground parking. Don't lose the Chumash Burial Grounds which are extensive here. Never build so much here—62,298 sq feet and 46,701 sq feet underground is incredibly oversized. The site is Excellent now—Don't replace the Peaceful area with such and such and ground from elsewhere—Never build 73 condos here. Never lose the excellent house at 3715 San Remo, especially for driveway. Save all the site. The Alternate project—office bldg would fall down in 1 Earthquake or less. Most of the Project is unsafe—1 status and 2 status. Never overbuild [cut off]

Concept is extraordinarily horrible—be well never harm the people of Santa Barbara. Never harm the Indians. Never build. Keep land and bld. Intact. Stop foolishness. Never merge the lots—they each are really big enough to support life. No one can afford condos. Project adds to congestion. Way too many people with young in tow—into State Street etc. Colossally oversized. Never tear up the garden. Never lose a tree whatsoever.—Leave all intact at the Beautiful site. Protect and preserve the nature. Don't join the [lots?]. They would be too big. Present building is far more sturdy in an Earthquake. Never expand into the splendid garden. It is wonderful. Keep the inn. It is excellent. [cut off]

Be well
Sincerely,
Paula Westbury
PAULA WESTBURY

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May 13, 2009
 650 Miramonte Rd
 Santa Barbara, Calif 9310
 874-3741
 Re: **TR** 3730 State St
 3715 San Remo Rd
 Sandman Inn
 Please read at 4:15
 Hearing site 5-14-09
 Beuwell

Dear Planning Commission:

The Sandman Inn as a Pictorial
 nature preserve full of native
 American Burial grounds, it is
 Pictorial, lovely garden,
 full of Indians making
 Peace Baskets, Save it. The
 walls recuperated from the
 last ~~land~~ fire. Please
 contact ~~at~~ Beuwell. The project is erroneous, the
 splendid garden is full of Native American
 10th People. They attend mass and go to work
 and school. They put out the fires as much
 as possible. The water is much in the
 exquisite garden. All was helped by the
 butterfly collection at the natural history
 Museum. Those insects died for science.
 Don't kill off the 10th People in this splendid
 walling place & garden. All are wearing
 green for St Patrick's day. They help the friars
 to be put out - all of them. Never forget
 to Save Sts. Never ever have grading here.
 Substantial Historic Value needed to be
 established. It was. It was Treasured.
 and cared for. Never ever demolish the
 Sandman Inn. It is off the road, not monstrosity
 Many people can see the vegetation from
 the road. It does not impede the view if it
 is never built. Open your eyes see the specter
 of tragedy. It would be a horrible building. View
 would be obstructed 45' + 31' is too high - incredibly
 high. Never demolish. It is totally unecological -
 you lose everything. The grading is uncommensal.
 never ever have underground parking - Don't ever
 locate the Chumash Burial Grounds which are ex-
 tensive here. Never build so much here - 62,228
 sq feet + 46,701 sq feet underground is incredibly
 oversized. The site is excellent now - Don't replace
 the peaceful area with such a noisy & ground firm
 elsewhere. Never build 73 Condos here. Never lose the
 Excellent House at 3715 San Remo, especially for driveway.
 Save all the site. The alternate project - After Bids
 would fall down in 18 months or less. Most of the
 project is unsafe - 187x100 + 287x100, never over ground -

Concept is
 retroactively
 horrible -
 recall
 never harm
 the best all
 of Santa Barbara.
 never harm
 the land
 never build
 anything that
 is not for the
 best of the
 people of Santa
 Barbara.
 Kell's - they
 each are worth
 big enough to
 support life,
 no one can
 afford Condo's
 Project adds
 to congestion.
 many of the
 people in the
 young in the
 world that are
 culturally
 minded. Now
 new to the
 garden
 now live a tree
 that never
 leave all intact
 at this beautiful
 site. Protect
 & preserve the
 nature.
 Don't join the
 Sts. They would
 destroy. Present
 nothing to
 we should find
 in Santa Barbara.
 never ever build
 into the splendid
 garden. It is
 wonderful. Keep
 the town of Santa
 Barbara beautiful

Comment Letter No. 10, Paula Westbury, May 13, 2009

Response 10-1

As discussed in the Initial Study, the project site is not located within a prehistoric or historic cultural resources sensitivity area. There is no evidence that the site involves any ethnic or religious use or importance. With any ground-disturbing activity the potential exists for the discovery of previously unknown buried deposits. If any such resources are discovered, work would be halted and a professional archaeologist consulted, pursuant to mitigation measure CR-1.

Response 10-2

See **Response 7-2**.

Response 10-3

The commenter's opposition to underground parking is noted. See the response to **Response 10-1** above regarding cultural resources. This comment will be forwarded to decision makers.

Response 10-4

The commenter states an objection to the size of the project and proposed underground parking facilities. The General Plan Circulation Element encourages locating parking underground if feasible. The size of the proposed project conforms to the standards of the City's Zoning Code. This comment will be forwarded to decision makers.

Response 10-5

The commenter's opposition to the demolition of the house at 3715 San Remo Drive is noted. This comment will be forwarded to decision makers. No further response is required.

Response 10-6

The commenter states that the office buildings proposed in the applicant's alternative would be susceptible to collapse during earthquakes. As discussed in the Initial Study, the City's *Master Environmental Assessment* (MEA) identifies the project site as not located on or near a known fault or fault zone. The nearest mapped fault is the Mission Ridge/Arroyo Parida fault, approximately 500 feet to the southeast of the project site. This fault is not considered to be active. The nearest active fault is the Santa Ynez fault, approximately 4.5 miles northwest of the project site. The MEA indicates that the project site is in an area of low damage to one- to three-story structures in a seismic event. The office buildings would be constructed in conformance with current building code standards, which would reduce the potential for damage to the proposed structures.

Response 10-7

The commenter's opposition is noted. This comment will be forwarded to decision makers. No further response is required.

Response 10-8

Under both the proposed project and the applicant's alternative, 11 of the proposed 73 condominium units would be designated as affordable units, increasing the City's supply of affordable housing.

Response 10-9

As discussed in the Draft EIR, the proposed project would result in 215 fewer daily trips, 5 fewer PM peak hour trips, and 25 additional AM peak hour trips, and the applicant's alternative would result in 852 fewer daily trips, 33 fewer PM peak hour trips, and 5 fewer AM peak hour trips as compared to existing conditions. Potential effects on pedestrian safety were considered in the Initial Study prepared for the proposed project and found to be less than significant. The existing sidewalk would be widened from 4 feet to 8 feet with a 4-foot parkway, which would improve pedestrian circulation adjacent to the project site. San Remo Drive, a Class 3 bikeway, was discussed in the EIR. The additional traffic on San Remo Drive as a result of the Town & County Apartments access relocation was assessed in **Section 7.7.1.3** of this EIR and determined to result in less than significant impacts.

Response 10-10

This comment states that the proposed project would increase pedestrian traffic in State Street. No unusual hazards regarding pedestrian safety are expected as part of the proposed project or the applicant's alternative. See **Response 10-9**.

Response 10-11

As discussed in the Draft EIR, the proposed project and applicant's alternative would require the removal or relocation of most of the mature trees within the project site. In a comment letter submitted in response to the Draft EIR (see comment letter No. 15 - Comment No. 16), the applicant has indicated that most of these mature trees would be reused as part of the landscaping for either the proposed project or the applicant's alternative. However, the commenter's opposition is noted, and this comment will be forwarded to decision makers. No further response is required.

Response 10-12

See **Response 10-6**.



LEAGUE OF WOMEN VOTERS OF SANTA BARBARA, INC.

328 East Carrillo Street, Suite A
Santa Barbara, California 93101

TEL/FAX (805)965-2422

email: info@lwvsantabarbara.org
www.lwvsantabarbara.org

Statement to Santa Barbara City Planning Commission on May 14, 2009

Subject: Sandman Inn Redevelopment

I'm Connie Hannah, speaking for the Santa Barbara League of Women Voters. Many League members participated in the Upper State Street Study, and they have maintained an active interest in how that area is developed. We have strongly supported continuing all the requirements of the S-D-2 Overlay Zone. For that reason we have been following the project proposed for the Sandman Inn property since 2004. In 2007 we asked for a much reduced footprint for this redevelopment.

1

Today we welcome the Applicant's Alternative and urge you to choose that over the original project. The removal of the three story hotel will greatly reduce the traffic impacts, and better preserve the views on the site. The smaller office building will surely generate less traffic.

2

However, we continue to be concerned that 73 condominiums will produce too many daily trips for this intersection. Since many of these are two and three bedroom units, they should be suitable for families with children, and there is not enough outdoor space provided on site. More outdoor recreation space is need for both children and adults, and would certainly help to sell urban condos. Because there are such wonderful trees here, some of them should be retained and serve as an outdoor focus for the project. We would support a reduced number of units in two stories, and a better use of open space and recreation space. We think that change would improve the visual effect of the project, and increase the desirability of the condos.

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RECEIVED
MAY 14 2009

CITY OF SANTA BARBARA
PLANNING DIVISION

Comment Letter No. 11, League of Women Voters of Santa Barbara, May, 14, 2009

Response 11-1

This comment states support for the requirements of the S-D-2 zoning designation. As discussed in **Section 5.0, Land Use and Policy Consistency**, of the EIR, the proposed project and the applicant's alternative both comply with the requirements of the S-D-2 zone.

Response 11-2

The commenter states support for the applicant's alternative. This comment is noted and will be forwarded to decision makers. No further response is required.

Response 11-3

As discussed in the EIR, the proposed project would result in 215 fewer daily trips, 5 fewer PM peak hour trips, and 25 additional AM peak hour trips, and the applicant's alternative would result in 852 fewer daily trips, 33 fewer PM peak hour trips, and 5 fewer AM peak hour trips as compared to existing conditions. As shown in **Table 7.0-8**, the existing development generates a total of 1,751 daily trips, while the applicant's alternative would generate a total of 899 daily trips, 428 of which would originate from the proposed condominiums. As shown in **Table 7.0-9**, this traffic would result in increased traffic at area intersections, but all intersections studied would operate at LOS C or better, which meets City standards, and none of the project-related increases would rise to the level of a significant impact.

Response 11-4

See **Response 2-3**.

Response 11-5

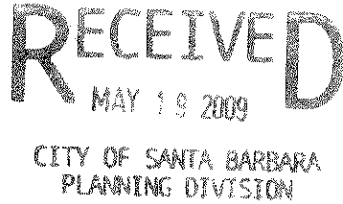
As discussed in the EIR, the proposed project and applicant's alternative would require the removal or relocation of most of the mature trees within the project site. **Section 8.0, Visual Aesthetics**, provides mitigation measures to require the relocation or replacement of mature trees to reduce potential impacts to a level less than significant. In a comment letter submitted in response the Draft EIR (see comment letter No. 15 - Comment No. 16, and Exhibit G in the applicant's comment letter), the applicant has indicated that 30 of these mature trees would be retained in place and a further 101 trees would be relocated on-site as part of the landscaping for either the proposed project or the applicant's alternative.

Response 11-6

This comment advocates a reduction in the residential density proposed for the site and better use of recreation and open space. This comment will be forwarded to decision makers. No further response is required.

May 14, 2009

Santa Barbara Planning Division
ATTN: Allison De Busk, Project Planner
P.O. Box 1990
Santa Barbara, CA 93102-1990



RE: Sandman Project-MST2007-00591

Dear Planning Division:

I remain shocked that the City is still advocating an increase in population and traffic for North State St. The portion of State St. between Las Positas/San Roque and La Cumbre Rd. has a great number of pot holes and is in a general state of disrepair. The City doesn't have the resources to properly maintain the road at the current traffic level.

1

The Whole Foods project is well under construction and will add hundreds of cars a day to the area of State and Hitchcock. That intersection is already heavily congested and at times it takes two or three cycles of the signal for cars to get through. There should be a new traffic study after Whole Foods opens.

2

The idea of putting more cars on Ontare Rd is scary! Lower Ontare Rd., above State St., has an extremely narrow bridge, has curves and a fire station that adds to the danger.

3

Even though the second proposal for this site is somewhat more acceptable, it still needs more study.


The last point is the demand on limited resources this project will put on the City. Water supplies are threatened by the Feds and state. They have already stated water flowing to the Southland will be reduced. UCSB has a plan to expand by five thousand students which will create more demand for water. The City can't pay for the current level of police and fire protection. Our infrastructure is pretty much stretched to the limit and much of it is in need of upgrading and repair.

4

All projects in "the pipeline" should be delayed until there is a complete review and upgrade of the City's infrastructure and emergency plans. The consequences of the increase in population caused by these projects are too dire to be ignored. The current EIR doesn't adequately address all the issues.

5

Sincerely,


Herbert Simpkins
3705 Hitchcock Ranch Rd.
Santa Barbara, CA 93105

Comment Letter No. 12, Herbert Simpkins, May 14, 2009

Response 12-1

The comment notes concerns regarding the general condition (disrepair) of roadways and streets in the project area and increased population and traffic associated with the project. Road maintenance is a matter addressed by the City as an ongoing issue and is covered by the City programs regarding public works and capital improvements; discussion of roadway conditions is beyond the scope of the EIR. This comment will be forwarded to decision makers. No further response is required.

Response 12-2

See **Response 7-1**.

Response 12-3

Circulation impacts on Ontare Road were considered as part of the Traffic Study, and were determined to be less than significant. As shown in **Tables 7.0-7** and **7.0-9**, the intersection of State Street and Ontare Road would operate at LOS A in both the AM and PM peak hours under both future and cumulative conditions. These levels of service meet City standards for intersection operation, and the project-related increases are not significant.

Response 12-4

See **Response 3-7** above.

The City has an approved UWMP, in which water supply estimates included growth projections and a margin of safety. The City's most recent Water Supply Management Report (WSMP), prepared in December 2008, discusses current reservoir levels and other water supply sources, including groundwater, recycled water, and desalinated water.¹² The 2008 WSMP identifies several water supply issues, including those related to supplies provided through the State Water Project, but does not conclude that water supplies are inadequate for projected demand.

The City does not supply water to UC Santa Barbara, and any additional demand generated by expansion of the university would not affect City water resources.

Response 12-5

This comment states that there is a need for review of City infrastructure and emergency plans, which is an issue of City policy and lies beyond the scope of this EIR. As discussed in the EIR, the proposed project and the applicant's alternative would be potentially consistent with the current General Plan. The Initial

¹² City of Santa Barbara, *Water Supply Management Report*, (2008) <http://www.santabarbaraca.gov/NR/rdonlyres/DD6D85AF-A326-4165-A2EB-24E346822331/0/WSMR2008FINAL.pdf>

Study evaluated the proposed project's consistency with existing emergency plans, and the project plan was evaluated by the fire department for site access. Impacts were determined to be less than significant. Similarly, as discussed in **Response 3-7**, the project was found to have less than significant impacts on public services. The EIR considered potential cumulative impacts as required by CEQA; **Section 4.0, Cumulative Scenario**, provides the list of projects that were considered along with the proposed project. No potential cumulative impacts were identified. This comment will be forwarded to decision makers. No further response is required.

-----Original Message-----

From: Linda Antone [mailto:linda@hudsoninstitute.com]
Sent: Thursday, May 14, 2009 2:33 PM
To: DeBusk, Allison L.
Subject: Sandman Inn project

I, along with many other residents of San Remo Plaza condominium complex, am opposed to specific elements of the proposed Sandman Inn project:

- Construction of a new driveway access from the Town & Country Apartments to San Remo Avenue, necessitating demolition of an existing residential unit.
- Any pedestrian passage through our condominiums (San Remo Plaza)
- Any tall buildings (3 story) near our property line

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This is the third time I have presented this information (either in writing or in person), and yet each time the project is scheduled for another hearing I see that the developers have changed very little in response to these objections.

Linda Antone
3663 San Remo Dr
Santa Barbara

Comment Letter No. 13, Linda Antone, May 14, 2009

Response 13-1

The commenter states opposition to certain aspects of the project including construction of new access driveways, pedestrian access through adjacent development, and height of buildings. Analysis of the new driveway access along San Remo is included in **Section 7.7.1, Long-Term Impacts**, of the EIR. Building height, as it relates to public views is included in **Section 8.0, Visual Aesthetics**, of the EIR. This comment will be forwarded to decision makers. No further response is required.



CITIZENS PLANNING ASSOCIATION OF SANTA BARBARA COUNTY, INC.
916 Anacapa Street, Santa Barbara, CA 93101
phone (805) 966-3979 • toll free (877) 966-3979 • fax (805) 966-3970
www.citizensplanning.org • info@citizensplanning.org

21 May 2009

Allison DeBusk, Planner
Community Development Dept.
Santa Barbara, CA

Sent via email to: *adebusk@santabarbaraca.gov*

RE: Sandman Inn Redevelopment Project DEIR

Dear Ms. DeBusk,

The Citizen Planning Association's South County Land Use Committee appreciates this opportunity to submit the following comments on the April 2009 Draft EIR about the Sandman Inn Redevelopment Project.

A. Explicitly or implicitly, the DEIR presents ample evidence for the environmental superiority of the Applicant's Alternative over the original Project. For example:

1. Less impact on mountain views and neighborhood character.
2. Less water and sewage usage, as well as less solid waste generation, by the Alternative's commercial component –

Water:	7.44 acre feet per year versus 19.53 afy
Sewer:	6.63 afy versus 16.94 afy
Solid Waste:	18.98 tons per year versus 84.80 tpy

The respective total impact figures, which include the impact of the 73 residences as well, are of course much higher.

3. Less traffic congestion (about 40% fewer average daily trips and 20% fewer parking spaces for the two parcels).
4. Less exposure of the residents to traffic noise and air pollution (2 instead of 7 dwelling units requiring closed windows and air conditioning for indoor noise mitigation).
5. Less exposure of the public to air and noise pollution during the period of demolition and construction (24 months instead of 29 months).
6. Less risk of water run-off to other properties and of eventual discharge into two nearby creeks, as well as into the drinking water well located near their confluence. The

1

CPA LUC comment letter, 5/21/09
Re: Sandman Inn Redevelopment Project DEIR
Page 1 of 3

resulting increase in the on-site retention of storm-water would help protect the floodplain south of Highway 101. This is especially important should conditions outstrip the "25-year storm event" referenced in the DEIR.

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B. In view of the above selective list of significant differences we question why the DEIR stops short of declaring the Applicant's Alternative "environmentally superior."

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We also note a few additional shortcomings in the DEIR. For example:

1. The DEIR lacks explicit analytical reference to the city's policy goal, expressed in numerous documents, of improving the jobs/housing imbalance. In particular, the job-generating potential of the 62 market-rate dwelling units is completely ignored. Furthermore, no comparison is offered between the predictably higher number of low-paying jobs generated by the original Project than by the Applicant's Alternative. Last but not least, we believe that the DEIR should have addressed the environmental desirability of transforming some of the market-rate condominiums into employer-supported rental housing for low-income employees of the 106-room hotel (original Project) or the 14,494 square feet of office space (Applicant's Alternative).
2. Several circumstances should not have been ignored when discussing the cumulative impact of growth on natural resources and public safety. The relevant factors include the decreasing availability of State Water due to last year's court decision about the Sacramento-San Joaquin River Delta, the increased siltation of local lakes and reservoirs due to large fires, and the increasing year-round wild fire danger widely attributed to climate change.
3. The project's site-specific, block-specific, and larger-scale cumulative implications for traffic and traffic-related air pollution are under-explored because the DEIR overlooks or dismisses some pertinent observations, intersection turning movement counts, road segment and collision statistics, as well as longer-term predictions that conflict with the information it relies on. Some of the evidence in question was referenced in our 8-page scoping comments of June 24, 2008 – a document included in the present DEIR, but insufficiently considered by it. We will repeat or amplify some of last year's arguments should they still be relevant at the time when the Final EIR is submitted for certification.
4. The DEIR lacks explicit analytical demonstrations of policy consistency with the Municipal Code's applicable parcel-by-parcel density limits. In this respect we note that the applicant claims the combined area of the residential and the commercial parcels (4.58 acres) for the purpose of determining the allowable density of the residences proposed for the residential parcel (3.52 acres). Likewise, the DEIR fails to analyze the extent to which the SD-2 special district's height requirement has or has not been met "in compliance with all applicable regulations." Section 28.45.008 D3 of the Municipal Code reads as follows: "Building Height. Three (3) stories not exceeding forty-five (45) feet and not exceeding the total floor area of a two (2) story building (thirty (30) feet) which could be constructed on the lot *in compliance with all applicable regulations*" [emphasis added]. Yet the applicant's diagrams of the buildable lot area and the associated calculations address only the required set-backs and ignore the required open space and the indispensable space for pedestrian connectivity, driveways, surface parking, and the like.

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5. The project site is not within the half-mile radius standard from a public park as recommended by the National Recreation and Park Association. Yet while the DEIR recognizes this fact, it does not address the issue of the high desirability of the provision of at least one playground and one or two basket ball hoops for the residents of the proposed 73 condominiums, 41 of which feature three bedrooms and can be expected to house children and adolescents.

9

6. The daily influx of tens of thousands of commuters and tourists should not have been ignored in the DEIR's cumulative analyses of our likely future demand for public facilities and public services (e.g., water supply, waste disposal, police and fire protection, emergency services, and road capacity for evacuations). In view of the recently increased gang violence, we call attention to the DEIR's disturbing silence about the following "base-line" situation, noted in *Santa Barbara General Plan Update 2030: Conditions, Trends and Issues* (August 2005), 152 of 350: "Currently the City of Santa Barbara operates with 1.58 [police] officers per 1,000 population – very close to the mean average for similar sized cities [as determined by the International City/County Management Association]. However, when the daily influx of 40,000 to 100,000 [tourists and commuters] is added to the resident population, the ratio of police officers per 1,000 is effectively reduced to between 1.1 and 0.75."

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C. We find that the unusual bifurcated format of the DEIR lacks sufficient clarity and believe that the Final EIR should either focus more sharply on evaluating the Applicant's Alternative, preferred by ABR and Planning Commission, or engage in a more systematic and more conclusive comparison of the original Project and the Applicant's Alternative as each relates to the No Project Alternative.

11

The presentation of relevant data should be made more user-friendly by the inclusion of a number of tripartite tables comparing the existing conditions, the original Project, and the Applicant's Alternative in terms of such quantifiable impacts as the following: peak-hour trips, average daily trips, projected consumption of potable water, generation of sewage inputs, etc. Separate tables should compare the current Sandman Inn's building heights, setbacks, FAR's, and the number of its mature trees with the projected results of both versions of the proposed redevelopment so that better qualitative judgments about the preservation of mountain views and of the site's feel of naturalness and openness can be rendered. Last but not least, the consultant should clearly designate which analyzed land use variant constitutes the "Environmentally Superior Alternative," and upon what factors the designation is based.

12

We thank you in advance for your serious consideration of our input.

Sincerely,



Naomi Kovacs
Executive Director

PH,GW;luc,nk

CPA LUC comment letter, 5/21/09
Re: Sandman Inn Redevelopment Project DEIR
Page 3 of 3

Comment Letter No. 14, Citizens Planning Association, May 21, 2009

Response 14-1

This is a general comment comparing the proposed project and applicant's alternative and noting a preference for the Applicant's Alternative. The comment notes several advantages of the applicant's alternative over the proposed project. These comments are noted and will be provided to decision makers for consideration; no response is required.

Response 14-2

For purposes of the EIR, the applicant's alternative was considered at the same level of analysis as the proposed project. The EIR does not make recommendations of on project over another as this is the discretion of the decision making bodies. The comment notes several advantages of the applicant's alternative over the proposed project. These comments are noted.

Response 14-3

Policies referenced in this comment are addressed in **Appendix 5.0, Supplemental Policy Consistency Analysis**, of the EIR. The proposed project would support City policies that make development of housing a priority by developing 73 residential units, including 11 affordable housing units. As the project site currently contains no residential uses, this would increase the availability of housing, including affordable housing, within the City. For additional discussion on jobs and housing, see **Response 2-4**.

Response 14-4

See **Responses 3-7** and **12-4**.

Response 14-5

As discussed in the Initial Study, the project site is not located in a City-designated high fire hazard area. Existing vegetation would be relocated or replaced with buildings and ornamental landscaping. The project would be subject to Fire Department and City Ordinance requirements for adequate access, structural design, and materials. Adherence to the standard requirements of the Uniform Fire Code with respect to building design would ensure that fire hazard impacts for the proposed project would be less than significant.

Response 14-6

The commenter refers to a comment letter submitted in response to the Initial Study, in which the commenter disputed the results of a traffic study performed by Associated Transportation Engineers (ATE). The EIR does not rely on the ATE study, and bases its analysis instead on a project-specific Traffic Impact Analysis prepared by Iteris, Inc., in 2009.

As discussed in the EIR, the proposed project would result in 215 fewer daily trips, 5 fewer PM peak hour trips, and 25 additional AM peak hour trips, and the applicant's alternative would result in 852 fewer daily trips, 33 fewer PM peak hour trips, and 5 fewer AM peak hour trips as compared to existing conditions. As shown in **Table 7.0-7** and **7.0-9** of the Draft EIR, the studied intersections would operate at LOS C or better with the addition of project-generated traffic under existing and cumulative conditions, and impacts would therefore be less than significant.

Also, see **Response 8-1**.

Response 14-7

See **Response 3-9**.

Response 14-8

The EIR provided a discussion of the S-D-2 zone overlay in **Section 5.5.3, Zoning Ordinance**, in which it was concluded that the proposed project and the applicant's alternative would be potentially consistent with all applicable zoning regulations.

The S-D-2 Zone does include the cited language with regard to allowed building height. In order to determine if a project is consistent with this requirement, the applicant typically submits an exhibit that identifies total lot area and total two-story buildable area. To determine the two-story buildable area, zoning requirements such as required setbacks, open space and parking are deducted from the lot area. This total is then multiplied by two to determine how much square footage could be contained in a two story building. When parking is proposed underground, the parking requirement does not need to be deducted from the lot area. The commenter is correct that the applicant's diagrams did not include required open space calculations.

Based on the R-3/R-4 zone's 15 percent at-grade open space requirement, the available, buildable ground area for the residential component of the proposed project would be 105,555 square feet (141,081 square feet less required setback areas less 15 percent). When this is multiplied by two, the result is 211,110 square feet of floor area that could be built in a two-story building. The proposed square footage for the residential portion of the proposed project is 93,716 square feet, well below the maximum allowable area.

Buildable ground area for the commercial component of the proposed project would be 49,615 square feet (58,370 square feet less required setback areas less 15 percent). When this is multiplied by two, the result is 99,230 square feet of floor area that could be built in a two-story building. The proposed square footage for the commercial portion of the proposed project is 62,298 square feet, well below the maximum allowable area.

Buildable ground area for the residential component of the applicant's alternative would be 119,964 square feet (141,134 square feet less required setback areas less 15 percent). When this is multiplied by two, the result is 239,928 square feet of floor area that could be built in a two-story building. The proposed square footage for the residential portion of the applicant's alternative is 93,797 square feet, well below the maximum allowable area.

The commercial component of the applicant's alternative does not contain any three-story structures; therefore no additional calculations are necessary.

Therefore, the project is consistent with the S-D-2 zoning requirements. Areas such as pedestrian connectivity, driveways, etc. are not part of the aforementioned height calculation.

Response 14-9

The City does not currently have adopted standards for proximity of residential development to parks. While both the proposed project and the applicant's alternative would increase the residential population of the proposed project site, existing parks within the City would be adequate to serve these residents. The residential portions of both the proposed project and the applicant's alternative include open space adequate to meet the requirements of the City of Santa Barbara Zoning Ordinance. (See **Response 2-3.**)

As the comment notes, the National Recreation and Park Association (NRPA) has established park service area standards for various types of parks. The Initial Study notes that NRPA standards have not been adopted by the City; however, the standards do provide a useful tool for assessing park space needs. The CTI Report determined that, based on NRPA standards, there is an uneven distribution of parkland in the City, such that some areas of the City may currently be underserved with neighborhood and community parks, but overall the City has adequate passive, community, beach, regional, open space, and sports facility parks. Residents of the proposed project would have access to these neighborhood parks, although somewhat less conveniently than if located within the NRPA standard distance.

This comment is noted and will be forwarded to decision makers.

Response 14-10

See **Response 3-7.**

Response 14-11

The EIR provides for a discussion and evaluation of the proposed project and applicant's alternative at equivalent levels. This level of analysis is provided for by CEQA and provides decisions makers the ability to select among either project should it decide to do so. The EIR does not provide a comparison

nor does it suggest a preferred project for consideration, but rather provides for a comprehensive analysis of the potentially significant issues for both. If a comparison of the applicant's alternative to the proposed project were made, similar to the comparison of alternatives in Table 1.0-1 of the EIR, it would state that the applicant's alternative would have less impact in the areas of Air Quality, Transportation/Circulation and Visual Aesthetics as compared to the Proposed Project.

Response 14-12

As discussed in the EIR, the *State CEQA Guidelines* require the consideration of alternatives to a project that could feasibly attain most of the basic project objectives while eliminating or reducing adverse environmental impacts. In the case of the proposed project and the applicant's alternative, no significant and unavoidable impacts were identified. **Subsection 9.6** of the EIR, Environmentally Superior Alternative, of the EIR considers the various environmental effects of the alternatives evaluated, but, given the absence of significant and unavoidable impacts, none of the alternatives truly constitute an environmentally superior alternative.



May 22, 2009

RECEIVED
MAY 27 2009
CITY OF SANTA BARBARA
PLANNING DIVISION

Ms. Allison DeBusk
Planning Division
City of Santa Barbara
PO Box 1990
630 Garden Street
Santa Barbara, CA 93101

Re: Comments to Sandman Inn Redevelopment Project 3714-3744 State Street Draft Environmental Impact Report (the "Draft EIR")

Dear Allison:

This letter provides comments to the Draft EIR for the Sandman Inn Redevelopment Project (the "Project"). These comments are made on behalf of Kellog Associates, LP, the property owner. These comments raise issues that should be addressed in the final Environmental Impact Report for the Project.

GENERAL COMMENTS

Project Objectives

Section 1.4 of the Draft EIR sets forth a statement of project objectives. This statement does not correspond with the stated project objectives we submitted to you, a copy of which is attached hereto as Exhibit A. Corresponding changes should be made to Section 1.4 and 3.3 of the Draft EIR.

1

Jobs-Housing Balance

Issues were raised at the EIR Comment hearing to the effect that the Project and the Applicant's Alternative will exacerbate the City's existing jobs/housing imbalance. We believe this is inaccurate. To the extent that the EIR needs to address this issue, it should factor in the extent of the housing provided by the Project and the Applicant's Alternative, and well as the 'net' number of new jobs the Project or the Applicant's Alternative may add to the City. We believe a reasoned analysis will show that both the Project and the Applicant's Alternative do not have a negative impact on the City's existing jobs/housing imbalance.

2

Housing Element Support for Three Story Units

The Draft EIR analysis of the USSS Building Height Limits (8.0-21) needs to bring forward the initially listed benefit to the City of the eleven affordable housing units proposed pursuant to the Supplemental Policy Consistency Analysis (pg 55) as described for both the Proposed Project and Applicant Alternative. Street amenities for both also include wider sidewalks, and a new bus stop.

3

Additional Policies Implemented by Project

The Draft EIR should also address various important City of Santa Barbara policies implemented by the Project and the Applicant's Alternative. These include the following:

Circulation Policies:

- ***Policy 13.1*** encourages the development of projects that combine and locate residential uses near areas of employment and services.
- ***Policy 13.2*** which encourages compact, pedestrian oriented development along major transit corridors

Housing Policies:

- ***Policy 3.1*** requires the City to make every effort to meet Santa Barbara's fair share of the regional housing need, including supporting infill residential projects and bonus density projects where appropriate
- ***Policy 4.1*** encourages the construction of new affordable housing opportunities for owners and renters, specifically encompassing three bedroom homes for first time and middle income buyers.
- ***Policy 4.3*** requires the City to concentrate its housing efforts on the redevelopment of opportunity sites in commercial and residential zones with priority for commercial and mixed-use development. The only identified opportunity site on Upper State Street is the Sandman Project site.
- ***Policy 5.2*** recommends that the City implement flexible standards for housing projects

4

Buffer Zone Issue

We agree with others that there needs to be more analysis of the General Plan Buffer. The analysis should recognize the role of the General Plan. Section 1 of the Land Use Element frames this analysis by recognizing that the General Plan is not law, rather policy. And as policy, it serves as a guide to the adoption of laws necessary to carry out its intent. The Zoning Ordinance is the law regulating the use of specific lands. The policy established by the General Plan is used to guide the structure of the Zoning Ordinance and map so that the law will have maximum effectiveness in bringing about an orderly coordinated development of the community in accordance with the General Plan.

As such, the Zoning Ordinance and Zoning Map were subsequently adopted by the City Council to effectuate General Plan policies with a clear delineation of zone districts. In this case, the Buffer policy was indicated by an imprecise line on the General Plan map, but was not otherwise defined or delineated. A detailed review of the Zoning Map will conclude that primarily residential zone districts are separated (or buffered) from primarily commercial type zone districts within the commercial corridors of the City. The buffer line on the General Plan map does not contemplate or require a physical space; none is contemplated or required by the implementing Zoning ordinance. Rather, the buffer designation indicates an approximate separation of uses which meanders through alley ways, backyards, and in this case through

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parcels. This buffer of uses has been effectuated by the Zoning Ordinance and map with a greater precision than the generalized buffer concept expressed by the General Plan.

5

Errata Sheet

Attached as Exhibit B is an errata sheet which points out errors of a typographical or phrasing nature made in the Draft EIR.

6

COMMENTS REGARDING THE APPLICANT'S ALTERNATIVE

The Applicant Alternative

During the Environmental Review Scoping Hearings, and the previous Request for Proposal of the original Sandman Inn Redevelopment & Condominium Project, the Sandman Inn applicant reserved their rights to include an applicant sponsored alternative, to be evaluated at a project level of detail and evaluation within the alternative section of the EIR.

This Applicant Alternative has been correctly identified in the Draft EIR as:

“Demolition of the existing 113-room Sandman Inn hotel, adjacent restaurant and all site improvements.” and “construction of approximately 14,254 square feet of office space contained in two buildings and 73 residential condominium units. This would include a total of 237 parking spaces with 66 parking spaces (61 spaces at-grade and 5 spaces underground) for the office component, 162 underground parking spaces for the residential component, and 9 at-grade common/shared spaces.”

7

Throughout the Draft EIR document this Applicant Alternative is frequently mentioned or identified in varying manners. The Draft EIR needs to be clear and consistent in how it addresses the Applicant Alternative, as an alternative to “Proposed Project”. Clarity on this point is essential in order to avoid potential confusion by the public, decision makers and others who may review the EIR document. The Applicant Alternative was prepared as an alternative to be included in the Alternatives Section (Sections 9.2 and 9.4) of the Draft EIR. We do acknowledge that the presentation of the Alternative in sequential sections throughout the Draft EIR may assist in the ‘side-by-side’ comparison to the proposed Project.

8

Nonetheless, to insure compliance with CEQA protocol, the Applicant Alternative should be addressed specifically within the Alternative Section of the EIR. Alternative 3 is a modified version of the Applicant Alternative; however the Applicant Alternative is not explicitly identified as requested. It is important to clarify this throughout the document and include the Applicant Alternative in some manner within the Alternative Section. See the discussion of Alternative 3 below, with respect to our suggested treatment of the Applicant Alternative in the Alternative section of the Draft EIR.

COMMENTS REGARDING TRAFFIC AND CIRCULATION ISSUES

1.6 Summary of Environmental Impacts

The reduction of overall traffic trips contemplated by the Applicant's Alternative should be expressed as a "Class IV" impact – an impact beneficial to the environment. As shown on Table 7.0-8, the Applicant's Alternative generates less traffic than the existing uses. In addition, as shown on page 6.0-41 and table 6.0-16, the Applicant's Alternative should be shown to have a Class IV impact – beneficial to the environment – as a result of its reduction of annual greenhouse gas emissions to be less than the greenhouse gas emissions of the existing land use.

9

State Street Residential Access (Eastbound Left Turn)

The Draft EIR recommends against allowing the proposed eastbound left turn access into the residential driveway along State Street. The stated reason is that the break in the median would not be compatible with the guidelines of the 2007 Upper State Street Study ("USSS"). However, the guidelines of the USSS are just that, guidelines, and are not binding and do not constitute policy mandates. The Draft EIR notes that "allowing left turns into the residential access drive would not result in a significant environmental impact related to traffic or circulation. Impacts are *less than significant* (Class III)." (Page 1.0-6). The Draft EIR also reports that the USSS contemplated a median break mid-block between Hitchcock and Ontare along State Street (see page 7.0-39). It actually appears that the USSS contemplated two mid-block breaks in the median.

10

The Draft EIR states one reason against the proposed left turn lane into the residential driveway is because it "will preclude any future lengthening of the westbound Hitchcock left turn lane" (Page 7.0-42). The Draft EIR should evaluate whether, in fact, there is any planned or contemplated future lengthening of the westbound Hitchcock left turn lane. The area surrounding the Sandman Project is entirely built out. The Draft EIR shows that even with the development of the Sandman Project, all intersections flow without any significant impacts. This applies in particular to the State Street/Hitchcock Way intersection. Therefore, it does not appear that under any reasonable analysis, there will be a future lengthening of the proposed westbound Hitchcock left turn lane.

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Attached as Exhibit C is a memorandum setting forth an analysis undertaken by Associated Traffic Engineers (ATE) regarding the capacity of the westbound Hitchcock left turn lane. This memorandum concludes that further study is warranted to address the "anecdotal data and field observation" the Draft EIR used to address the capacity of the left turn lane at Hitchcock. ATE's analysis shows that there is more than sufficient capacity for that left turn lane as it exists now, and there would be more than sufficient capacity even if the volume of left turns increased by ten percent.

Unless the Draft EIR shows the lengthening of the westbound Hitchcock left turn lane to be a planned improvement, or an improvement supported by realistic analysis, speculation as to the possibility of lengthening should not be utilized as a ground for disapproval of the proposed left

turn movement into the Project residential driveway. Further, given that this existing road improvement is in the City owned right-of-way, if future traffic conflicts dictate a need for redesign of the median area, the City would certainly have the ability to lengthen the Hitchcock left turn lane.

There are many reasons to support including a left turn lane into the underground garage of the residential portion of the Project, including the following:

- Facilitates entry to residential project
- Facilitates emergency response access to entire project
- Would not result in any environmental impacts (Draft EIR labels it Class III with the left turn)
- Reduces “U-turn” movements at State and Ontario
- The existing median landscaping which would be removed to accommodate this left turn lane can be replaced in a new median of similar dimensions located just to the east of the proposed left turn as shown on the sketch attached hereto as Exhibit D.
- The “No U-Turn” sign could be posted in this new median or on a mast arm as contemplated by the Draft EIR.
- The USSS specifically contemplated some mid-block turns in this block
 - Figure 24 of the USSS traffic study showed two in this block (a west-bound left turn into the Tee Off property, and an east-bound left turn into 3700 State Street)
 - Other locations shown could have more inbound peak hour left turns than the Sandman residences, resulting in greater ‘friction’ than the proposed location
 - The EIR should analyze whether the proposed location should be the location for one of the mid-block left turn locations used as examples in the USSS.

11

The Draft EIR should analyze two possibilities with respect to the proposed left turn access into the residential driveway. First, it should analyze whether the addition of a single break in the median (in addition to the two contemplated by the USSS) that allows left turns into the proposed residential driveway will have an impact on the traffic flow along State Street that is adverse. Second, it should evaluate whether moving one of the two mid-block breaks in the median contemplated by the USSS (Page 7.0-39) to a location that would allow left turns into the proposed residential driveway would have a detrimental effect on the flow of traffic along State Street. Merely deferring to USSS guidelines without truly analyzing the effect of the proposal is not a sufficient analysis of this subject.

The Draft EIR should also address the possibility outlined by Commissioner Bartlett at the EIR comment hearing that a left turn may be possible from east bound State Street at Hitchcock directly into the Property without crossing the property to the west. The Applicant would be willing to consider incorporating into its design any left turn movement into the Sandman Property at the Hitchcock extension intersection which the City staff and the EIR traffic consultants determine to be feasible.

12

Sandman Traffic Studies

Page 7.0-1 of the Draft EIR cites three Associated Transportation Engineers' prepared reports regarding traffic impacts of the proposed Sandman Project. The reports shown do not constitute all of the traffic analysis that has been prepared on behalf of the property owner in connection with the Sandman Project. Attached as Exhibit E is a schedule of all of the traffic studies that have been prepared and presented to the City in connection with the proposed Sandman Project.

13

Driveway Frequency and Spacing

Page 7.0-43 states that the USSS recommends reducing the number of driveways and providing a minimum driveway spacing of 220 feet and a preferable spacing of 440 feet if feasible along the upper State Street area. The Draft EIR acknowledges that the proposed two driveway spacing is an improvement over the existing situation, which consists of four driveways spaced in the same frontage. The Project, as proposed, is two parcels, one is a residential parcel and the other is a hotel parcel. In the Applicant's Alternative, the hotel parcel is generally replaced by an office complex parcel with the adjustment of its lot line to accommodate residential units moved back from State Street. The existing property configuration is two separate parcels. Both the proposed Project and the Applicant's Alternative contemplate two separate parcels.

While one of the eight recommendations of the Upper State Street Study promote 220 to 440 foot mid-block driveway spacing, these distances are impractical and infeasible given the existing parcel sizes, uses and configuration of the area. Figure 11 of the Upper State Street Study provided a tabular summary of the existing intersection and mid-block driveway spacing on both sides of State Street, and indicated average mid-block driveway spacing ranges from 39 to 176 feet – far less than the minimum recommended distances.

14

We have undertaken a graphic study of the driveway spacing of the area from La Cumbre Rd. to Alamar Ave. to identify the character of mid-block driveways in the Project vicinity. That study is attached as Exhibit F. As shown in the exhibit, the area contains 74 parcels on the north side of State Street between Alamar and La Cumbre and 50 parcels on the south side. Of these, none of the privately owned parcels meet the proposed minimum driveway spacing recommended by the USSS. The entire 15,000 linear feet of State St. frontage from La Cumbre Rd. to Alamar Ave. contains approximately 111 mid-block driveways, and therefore averages approximately only 135 feet of property frontage per driveway. The Sandman base project and applicant alternative as proposed would have two curb cuts along the Project's 372 feet of frontage for an average of 186' per curb cut – significantly above average for the area.

Focusing on the North side of the block in which the Project exists, - Hitchcock Way to Ontare Road – Table 11 of the Upper State Street Traffic, Circulation and Parking Study (Meyer, Mohaddes Associates) shows that the block is 1296 feet in length and contains thirteen mid-block driveways. The average spacing currently is 69 feet and the maximum spacing is 167 feet. Table 3 of the Upper State Street Study sets forth recommended general driveway spacing guidelines. The compliance of both the Project and the Applicant's Alternative to the USSS Driveway Spacing Guidelines are as follows:

	USSS DRIVEWAY SPACING COMPLIANCE	
USSS Table 3 Driveway Spacing Guidelines	Project Compliance	Applicant Alternative Compliance
1. Minimum driveway spacing of 440 feet is desired if feasible. Where access requirements cannot otherwise be met, a minimum driveway spacing of 220 feet may be considered.	Project does not comply – neither does any other privately owned parcel on State Street	Applicant's Alternative does not comply – neither does any other privately owned parcel on State Street
2. Locate driveways at median openings.	The residential access is proposed for location at a median opening. The primary access for the hotel (Project) is governed by its distance from the Hitchcock intersection, not the median break.	The residential access is proposed for location at a median opening. The primary access for the office (Applicant's Alternative) is governed by its distance from the Hitchcock intersection, not the median break.
3. The centerline of the drive shared by both properties is on the joint property line	Shared (westerly) access complies	Shared (westerly) access complies
4. Corner clearance (departure side) requirements	N.A.	N.A.
5. Where raised median, the approach side driveway is not less than 110 feet from intersection	Project Complies	Applicant's Alternative Complies
6. Approach side driveway where no median	N.A.	N.A.
7. Limit new access to one driveway per property.	The Project has one driveway per parcel. The Project eliminates a second drive for each parcel, reducing the number of driveways by half from the existing condition.	The Applicant's Alternative has one driveway per parcel. The Applicant's Alternative eliminates a second drive for each parcel, reducing the number of driveways by half from the existing condition.
8. Recognize that access for parcels that cannot conform to the spacing criteria may be necessary.	Access for each parcel is required separately. Access for each parcel cannot meet the driveway spacing requirements for distance from intersection and driveway to the east	Access for each parcel is required separately. Access for each parcel cannot meet the driveway spacing requirements for distance from intersection and driveway to the east

The benefits of the proposed driveway spacing include the following:

From a USSS Guideline perspective, the two driveways proposed provide several benefits:

- The USSS guidelines are expressly stated to be evaluated on a case by case basis. They do not constitute policy or mandatory requirements. A material factor in the analysis of this property is the reduction in existing driveways from four to two.
- The proposed driveway spacing satisfies four of the five applicable USSS guidelines. No privately owned parcel on State Street satisfies all of the proposed guidelines.
- There is no environmental benefit to combining the two access drives
- Combining the two access drives would not comply with Guideline 7 of the USSS Table 3, which contemplated one driveway per property.

From a traffic flow perspective the proposed two driveways also offers benefits:

- The single driveway would adversely affect traffic movement from the Sandman Project.
 - The additional concentration of vehicles exiting may find it difficult to utilize the Hitchcock left turn lane.
 - The Draft EIR notes that **“the proposed residential driveway [on the easterly end of the Project] provides a better location to accommodate exiting westbound traffic because of the longer distance from the Hitchcock Way intersection”**.
- The single access point would increase the “friction” of State Street traffic by concentrating all inbound and outbound traffic movements.
- Separation of office and residential traffic is typically preferred, as outbound AM traffic may have added conflicts with inbound AM office traffic in the driveway area itself.

14

A planning perspective also shows the benefits of the proposed driveway spacing:

- A single drive could be required to be designated as a public street under the City of Santa Barbara requirements (see July 10, 2003 staff report).
- A single drive would introduce substantial amounts of vehicle traffic into the center of the Project.
 - Significant adverse impact on the livability of residences fronting upon the center drive
 - Contrary to the main reason for incurring the expense of underground parking for the residences – eliminating cars from most of the Project surface
- A single drive does not accomplish the desired separation of most of the residential and business uses.

It is inequitable for the USSS to establish guidelines regarding driveway spacing on the Sandman Project that cannot be enforced against any of the properties in the USSS area. Further, as the property will be comprised of two lots, it is inequitable for the Draft EIR to subject in Alternative 4 a single access point on both lots. Finally, as you know from the Staff Report on the prior design of the Project, the City staff raised the issue with respect to a proposed driveway serving

more than three units as to whether it could be considered a public street. Therefore, if the single access alternative were enforced, it could be considered a “public street” which would render the proposed residential density and underground parking infeasible. Therefore, it is inequitable to enforce this driveway spacing from the USSS guideline in a manner that denies one of the two existing legal parcels its direct right of access to State Street.

14

Office Parking Operations

Pages 7.0-56 and 57 address the office parking operation. It includes a suggestion that “14 of the 18 at-grade spaces along the office access drive be allocated to office parking”. We disagree with this recommendation.

The proposed Project contains 17 unallocated spaces on the surface along the center hotel access drive. The Applicant’s Alternative shows 9 unallocated spaces along that same center drive, now proposed for an office access drive. We believe that retention of the unallocated spaces on the surface is very important for the actual operation of the Project. By way of explanation, these additional shared spaces exist for two primary reasons. First, they were added in response to neighbor and planning commission expressed concerns about overflow parking since there is no adjacent street parking which could absorb overflow. Second, they exist to facilitate the practical functioning of the property, in particular to allow for the daily in-and-out where use of the guest parking spaces in the underground parking garage might not be optimal, including:

15

- Deliveries such as overnight or package (Fed Ex/UPS), furniture and appliances, and food, as well as residential move-in/move out
- Services (plumbing, electrical, painters, appliance repair, rug cleaners, landscape etc.)
- Oversize vehicles (vans, cars with roof top bike racks, etc.)
- Short-stop drop-off/pick-up for residents

As a result, the second sentence of mitigation measure T-8 should be deleted, as the purpose can be achieved simply by the use of the first sentence of mitigation measure T-8 appearing on page 7.0-63.

ON-SITE TREES AND VIEW ISSUES

Policies Pertaining to On-Site Trees

The Draft EIR states in several places (pages 1.0-7, 5.0-10 – 11, and 8.0-20 – 34) that the loss of all on-site trees and lack of significant replacement vegetation is considered a potentially significant, mitigable (Class II) impact for both the proposed Project and the Applicant’s Alternative. The Draft EIR appears to misinterpret the landscape plan in order to derive its conclusion that there would be a lack of significant replacement vegetation or, on page 8.0-23, that there will be “no replacement of significant vegetation”.

16

The landscape plan submitted states (as the Draft EIR notes) that where feasible the existing, mature trees may be replanted on site. In order to clarify the applicant’s intent, the applicant’s

landscape architect, Susan Van Atta, has prepared a report attached as Exhibit G. This report identifies the actual number of trees existing on site, the number of existing trees that the applicant intends to replant and the number of canopy trees the applicant intends to add. As shown on that report, there will be a very substantial preservation of the existing mature trees on-site in a manner that frames, but does not block views and a very significant expansion of the number of canopy trees on the site. Given the detail of the landscape plan with this clarification, the EIR should be revised to show compliance with Conservation Element Policies 4.0-4.3 as noted in the consistency analysis below.

16

The Draft EIR further states that it may not be feasible to plant large trees on the top of the underground parking structure. The attached report by the landscape architect contains technical diagrams of how planters over parking (or roofs) are constructed, as well as numerous examples of very large trees currently existing in planters constructed over parking. The Draft EIR also does not address in detail the ample room along the 20 foot front setback and the 10 foot side and rear setbacks of the Project for planting trees that are not over the deck of the parking structure. Finally, in the Applicant's Alternative, the front eighty-five feet of the easterly half of the Project and the entire office parcel are also not over any parking structure and may be utilized to preserve or relocate existing mature trees located currently in these areas.

Other Visual Impacts

The Draft EIR states on Page 1.0-8 that the proposed Project and the Applicant's Alternative would partially obstruct views of the Santa Ynez Mountains from the Hitchcock Way and State Street intersection "thereby making it potentially inconsistent with some policies of the USSS". The reference does not show which policies of the USSS this may be inconsistent with. The Applicant's Alternative preserves vastly more views and opens up more view corridors than exist currently. The only views visible from the Hitchcock and State Street intersection currently are limited views through tree trunks. (See Draft EIR page 8.0-25). The USSS adopted guidelines, are not policy mandates. None of the guidelines adopted by the USSS discuss the need to protect partially blocked views seen through numerous tree trunks. Therefore, this statement is not accurate and does not appropriately characterize the guidelines adopted by the USSS.

17

Skyline and Mature Trees

Pages 8.0-2 through 8.0-23 discuss the impact of the proposed removal of mature trees from the property. Two common themes run through the analysis which we believe are incorrect.

The first incorrect theme is that trees will only be planted in planters over the parking structure. The entire site is approximately 4.58 acres. Under the proposed Project, the underground parking structure would be 4.14 acres. Under the Applicant's Alternative, the underground parking structure would be 3.06 acres. As a result, there is more than .44 acres in the proposed Project and 1.52 acres of land in the Applicant Alternative area of land that is not over a parking

18

deck on which trees could be planted where not inconsistent with other uses. See the calculations attached as Exhibit H.

18

The second incorrect theme is that mature trees, including in particular the existing skyline trees, could not be relocated as part of the Project. The landscape plan clearly states: "selected mature palms will be relocated onsite". The landscape architect's report attached contains additional information regarding the viability of planters located on the top of the parking deck. Based on that review and analysis, it concludes a very substantial portion of the existing mature and skyline trees may be replanted on site. In addition, the landscape plan proposes an additional very substantial number of canopy trees to be planted on site. The EIR should address how the trees to be planted or relocated by the Applicant exceed by far the existing tree count on the property.

19

Consistency Analysis – Conservation Element Rules Regarding Trees

Conservation Element Policy 4.0 states that "Trees...should be preserved and protected". The DEIR analysis concludes incorrectly that the proposed Project would remove the existing trees from the Project site, as if to suggest that most of these trees would not return to be replanted on site as proposed by the submitted landscape plan. Additional analysis of the landscape plan is necessary and should conclude that the proposal is consistent with preservation and protection of existing trees on site.

20

Implementation Strategy 4.1 states that "Mature trees should be integrated into project design..." The DEIR analysis concludes incorrectly that the proposed Project would remove the existing trees from the Project site, again as if to suggest that most of these trees would not return to be replanted on site as proposed by the submitted landscape plan. Additional analysis of the landscape plan is necessary and should conclude that the proposal is consistent with Implementation Strategy 4.1 (please note I.S. 4.1 is not a policy).

21

Implementation Strategy 4.2 states that "All feasible options should be exhausted prior to the removal of trees." The DEIR analysis concludes incorrectly that the proposed Project did not exhaust all feasible options to tree removal when planting over a proposed underground garage. In fact, the DEIR has no basis for their conclusion that all feasible options were not exhausted. We submit that short of an infeasible redesign to remove the entire underground parking structure, the applicant is proposing a feasible option to preserve trees, by replanting on site post-construction. Additional analysis of the landscape plan is necessary and should conclude that the proposal is consistent with Implementation Strategy 4.2.

22

Implementation Strategy 4.3 states that "Major trees removed as a result of development...shall be replaced..." The DEIR analysis concludes incorrectly that the proposed Project did not propose to replant or replace existing major trees on site. This analysis is also somewhat confused by mitigation measure VA-2 (8.0-34) which requires the City Arborist to determine the number of "major trees" prior to removal, yet the DEIR preparer concludes inconsistency

23

without the benefit of this determination. Additional analysis of the landscape plan is necessary and should conclude that the proposal is consistent with Implementation Strategy 4.3.

23

The Draft EIR should correctly identify which references are policies and which are implementation strategies. Specifically it should note that Implementation Strategies 4.1-4.3 are not policies.

The additional analysis should include analysis of Susan Van Atta's comments at the EIR comment hearing as well as the information provided and attached hereto. Subsequent to the additional analysis, the DEIR should also make reference to both the proposed Project and Applicant Alternative as they relate to the overall City Conservation Element Goals to "Protect and enhance the scenic character of the City", and "...preventing unnecessary removal of significant trees and encouraging cultivation of new trees." We would respectfully submit that the Project and the Applicant's Alternative each is consistent with these goals.

24

View Corridors

Page 8.0-28 addresses the view corridors created by the Applicant's Alternative. However, it does not go on to identify the view corridors, other than by reference to the landscape driveway that cuts through the center of the Project. The Applicant Alternative actually adds several view corridors. First, there is a view corridor opened up through the easterly paseo created in part by moving the proposed residential condominiums back from State Street and in part by opening a space between the two rows of those condominiums. The second is the center drive aisle noted in the draft EIR. The third is a view corridor around the two-story office buildings. Finally, a fourth view corridor is offered from the intersection of State and Hitchcock through and over the large surface parking lot located behind the office buildings shown in the Applicant's Alternative.

25

Visual Aesthetics Modifications

For clarification purposes, the visual aesthetic mitigation requirements should be modified to read as follows:

VA-1: Prior to the removal of any trees, and prior to the final design review, a landscape plan accommodating the relocation of existing mature palm trees, particularly those considered "skyline trees" (tall [55 to 65 foot] Mexican Fan palms [*Washingtonia robusta*]), to the extent reasonably feasible, shall be submitted to the City arborist for review and approval. This plan shall include planter design specifications to ensure the long-term growth and survival of relocated trees.

26

VA-2: Prior to removal of any trees, the applicant shall revise the landscape plan to include one specimen replacement tree for each mature tree (as determined by the City arborist) removed.

27

COMMENTS REGARDING TOWN & COUNTRY AND SAN REMO ISSUES

Town & County Apartment Access Relocation is Separate

The relationship between the Project and Applicant Alternative, and the separate relocation of the easement access to the Town & Country apartments require clarification within the Sandman Inn Draft EIR.

The Draft EIR correctly sets forth a description of the Project and the Applicant's Alternative, as well as the demolition on the Project site as a part of the Project Description in Section 1.3 of the Draft EIR. However, the Draft EIR erroneously includes as a part of the Sandman Project the relocation of the existing access to the Town & Country Apartments (referred to as affecting two additional parcels (APNs 053-300-032 [1.0 acre] Town & Country Apartments at 3730 State Street, and APN 053-222-010 [0.20 acres] an existing duplex at 3715 San Remo Drive) (the "T&C Easement Relocation"). The T&C Easement Relocation is not a part of the Sandman Project. It is a separate private relocation of an easement that the Draft EIR needs to account for only in the sense that it will affect both the Project and the Applicant Alternative.

The owners of Town & Country Apartments, Gene and Elaine Smith, desire to relocate an appurtenant access and utility easement, which runs southerly from their property through the Sandman Inn property, and terminates at the State Street right-of-way. The relocated easement will provide equivalent access and utility purposes, and run from the Smiths' northeasterly corner of their property, and terminate northerly at the San Remo Drive right-of-way. The T&C Easement Relocation is completely separate and apart from the Sandman Inn Project. The Smiths will move ahead with their easement relocation no matter the outcome of the Sandman Inn Project.

In the summer of 2006, the T&C Easement Relocation processing commenced with the Sandman Inn property owners. In anticipation of new easements and a new access route for the apartments, in September 2006 the Smiths began the Sign Application process in order to provide for new Town & Country Apartment access signage from San Remo Drive (Application Number SGN2006-00127). At an October 11, 2006 Sign Committee hearing, the Smiths received Preliminary Approval of their sign application and were well on their way to moving forward with their T&C Easement Relocation.

No environmental review is required for the T&C Easement Relocation. Notwithstanding, during this same time period City staff began expressing concerns to the Sandman Inn property owners about the T&C Easement Relocation moving forward prior to the Sandman Inn Project undergoing an environmental review which would establish, what, if any, impact the T&C Easement Relocation would have on the Sandman Project. City staff desired to have any impacts of the T&C Easement Relocation evaluated in the context of the Sandman Inn Project. As a result of several discussions with City staff, the Smiths ultimately acquiesced to a delay of their T&C Easement Relocation Project, in order to have the T&C Easement Relocation considered in the EIR for the Sandman Project.

This access rerouting is an independent matter. It is not dependant upon any outcome with respect to the Sandman Project or the Applicant's Alternative. The T&C Easement Relocation will go forward without respect to whether the Sandman Project is completed or not. The owner of the Town & County Apartments and the owner of the San Remo Drive duplex have delayed implementing the project solely to accommodate the request of City staff to delay it until the Sandman Project environmental assessment is completed. The Draft EIR clearly demonstrates that the T&C Easement Relocation has no adverse environmental impacts. Therefore, the relocation of the Town & County Access to San Remo will proceed independently immediately upon the completion of the EIR and will not await future developments with respect to the Sandman Project.

28

Mr. and Mrs. Smith and the San Remo duplex owners will proceed with the relocation promptly upon the certification of the EIR.

Impacts of Apartment Driveway on San Remo

The Draft EIR categorizes the potential impacts of this driveway along San Remo as potentially significant but mitigable ("Class II") impacts that can be resolved with design measures to ensure adequate sight lines. Two of the design measures identified in the Draft EIR, the removal of a fence and landscaping on neighboring property deserve comment. First, an existing driveway is present in this location. To the extent that the neighbor's landscaping or fence encroach upon mandated sight lines for this driveway, the City should enforce their removal. Second, the Draft EIR may not condition or impose mitigation conditions on a project that are dependent upon receipt of permission from a third party. Mitigation Measure T-1 should be reworded to reflect that the San Remo Drive property owner may not have control of some or all of the existing vegetation and fencing. This could be accomplished by adding the following to the end of Mitigation Measure T-1:

29

“...This shall apply to all landscaping and fencing on the 3715 San Remo Drive property. Further the owner of 3715 San Remo Drive shall request the neighboring property owner to the east to trim or remove vegetation/fencing on that property sufficient to provide adequate sight lines along San Remo Drive at the cost and expense of the owner of 3715 San Remo Drive.”

30

Project Traffic Additions to San Remo Drive

Here is yet another instance where the easement relocation is incorporated within the Sandman Project. Care is needed to clarify here and through the entirety of the EIR document that the T&C Easement Relocation is separate and distinct from the Sandman Project and any of the alternatives. Page 7.0-28 sets forth the proposed Project traffic additions to San Remo Drive. The same numbers also apply to the Applicant's Alternative. The analysis does not show that the additional traffic that would result on San Remo Drive is reduced by the demolition of the existing San Remo Drive duplex that would allow for that access.

31

Town & Country Apartments Parking on Sandman Property

The Draft EIR at page 7.0-58 concludes that the Town & Country Apartments do not appear to park on the existing Sandman hotel property. This is correct. This is entirely consistent with the observation of hotel management personnel over a number of years.

32

COMMENTS TO THE ALTERNATIVES

Alternative 2: Alternative Set Design – Reconfigure Hotel (Proposed Project Only)

Alternative 2 of the Draft EIR proposed re-designing or reconfiguring the proposed hotel. The proposed redesign of the hotel is not feasible for several reasons. Most important among them are that it would involve constructing buildings on an easement of which the neighboring property owner is the beneficiary. Those easement documents have been provided. The proposed redesign area would also need to be pulled back from the property line by at least five feet to allow operable windows for the hotel rooms to meet building code opening protection requirements. These two constraints would only allow a reduced portion of the second floor of the proposed alternative to be possible, and it is likely that the resulting “tuck-under” parking situation created by floating the second floor building mass existing parking easement would not be acceptable by ABR, as it would not be characteristic of well-designed Mediterranean-inspired architecture. Finally, while the second floor area could allow up to eight additional standard rooms, it would cause two currently proposed rooms to be un-useable, as they would not have access to light, air or view. Attached as Exhibit I is a copy of the revised proposal shown in Figure 9.0-1 with the room locations superimposed.

33

Alternative 3: Retain Front Setback Trees (Applicant’s Alternative)

Alternative 3 essentially adopts the Applicant’s Alternative as an alternative to the proposed Project in the Draft EIR. The only modification made is the retention of certain front mature trees located in the front setback area. In order to assure CEQA compliance, Alternative 3 should incorporate by reference all of the analysis, findings and mitigations with respect to the Applicant’s Alternative set forth in the body of the Draft EIR. This incorporation by reference should be inserted directly following the heading of Section 9.4.3 and should read as follows:

Alternative 3 has two components. The first [which should be labeled Alternative 3.A] is the Applicant’s Alternative as submitted by the Applicant. The second, [which should be labeled Alternative 3.B] is a refinement of the Applicant’s Alternative that retains certain trees located within the front setback.

34

Alternative 3.A: Applicant’s Alternative

This Applicant Alternative consists of the demolition of the existing 113-room Sandman Inn hotel, adjacent restaurant and all site improvements, and the construction of approximately 14,254 square feet of office space contained in two buildings and 73 residential condominium units. This would include a total of 237 parking spaces with 66 parking spaces (61

spaces at-grade and 5 spaces underground) for the office component, 162 underground parking spaces for the residential component, and 9 at-grade common/shared spaces.

This EIR has been set up to evaluate Alternative 3.A at a project level of detail and evaluation within the alternative section. In order to achieve the specified level of detail, the full evaluation of the Applicant Alternative is contained within the entirety of this document. All references to, and discussion regarding the Applicant's Alternative in this EIR are hereby incorporated into the Alternative Section of this EIR by this reference.

34

Alternative 3.B: Retain Front Setback Trees (Applicant's Alternative)

[Continue with the text of Section 9.4.3]

We further believe that Alternative 3.B has been drafted in manner that is both too broad and too narrow. In the "too broad" category, this Alternative specifically refers to the retention of both the jacaranda and the blue atlas cedar in the front setback area. It states that the retention of the jacaranda may require redesign of the shared driveway entrance. We agree the premise that this Alternative may allow for retention of certain of the mature trees, including perhaps the blue atlas cedar. However, we feel it is too broad to justify the retention of the jacaranda, which is not a significant, unique or historic tree, at a cost of potentially modifying the driveway and blocking views. This focus on retention of trees in the front setback area should be on existing trees that may be retained should they not adversely impact views. We believe that the blue atlas cedar may fall in this category while the jacaranda does not. The figure at 9.0-2 of the Draft EIR clearly shows the dramatic adverse impact on views caused by the retention of the jacaranda.

35

In context of being too narrow, Alternative 3.B also should address the possibility of the applicant utilizing the front setback area shown for the purpose of relocating from the Project site and planting other skyline or mature trees that will permit with compliance with proposed mitigation measures VA-1 and VA-2. The purpose would be to plant them in a way that screens the buildings and frames, rather than blocks, the views.

36

Alternative 4: Single Driveway Alternative

Alternative 4 – the single driveway alternative of the proposed Project and Applicant's Alternative should not be considered as feasible. This alternative exists solely to address the driveway spacing guideline of the USSS. As stated above, this driveway spacing should not be enforced on this Project considering the fact that none of the privately owned properties along State Street comply with this. Additional reasons set forth on pages 8 and 9 of this letter that this alternative should not be adopted are stated above. Each of these reasons should be evaluated by the EIR in order to constitute an accurate "case by case" evaluation of the application of the USSS guidelines to the Project or the Applicant's Alternative.

37

Conclusion

In conclusion, we appreciate the opportunity to provide comments to Draft EIR. We look forward to your incorporation of those comments into the final EIR.

Sincerely,


Gregory J. Parker
on behalf of Kellog Associates, LP

Exhibits Attached:

<u>Exhibit</u>	<u>Subject</u>
A	Project Objectives
B	Errata Sheet
C	ATE Report – Hitchcock Westbound Left Turn
D	New Median Sketch
E	Schedule of Prior Traffic Studies
F	Upper State Street Driveways
G	Landscape Architect's Report
H	Available Land Calculations (Not Over Parking Garage)
I	Alternative 2 Hotel Room Layout

Exhibit A
Sandman Project Objectives

- Provide an in-fill redevelopment Project consistent with the City's existing General Plan as applicable to the North State neighborhood and the Upper State Street Study goals and objectives, as well as the City's General Plan Update Policy Preferences as articulated in December 2008;
- Provide 73 housing opportunities including 62 units which are affordable by design (829-1531 sq. ft. – 1 to 3 bedrooms) and 11 which are Affordable units;
- Provide housing opportunities which are located on the City's major transportation corridor and which are in close proximity to retail and service facilities;
- Redevelop an existing underutilized commercial property to a mixed use project consisting of commercial and residential units;
- Redevelop an existing non-energy efficient commercial property to a mixed use project with "green/sustainable" facilities;
- Redevelop an existing underutilized commercial property with improvements which will enhance views of the mountains;
- Provide underground parking at a minimum for the residential units;
- Enhance pedestrian connectivity with State Street for the Property and neighbors to the North;
- Incorporate commercial uses into site to provide for the possibility of residents working on site, as well as locating visitor serving uses along the transportation corridor; and
- Effect the strong desire of both property owners to eliminate the access conflicts between the Town & Country Apartments and the Project property fronting on State Street.

Additional Objectives of the Developer's alternative:

- Enhanced compliance with the Upper State Street Study goals and objectives; and
- Incorporate office uses into site to increase the likelihood of residents working on site, as well as locating office uses along the transportation corridor.

EXHIBIT B
Sandman Draft EIR
Errata Sheet

<u>Page</u>	<u>Paragraph</u>	<u>Errata</u>
1.0-4	2 nd Bullet	Air Quality ... "Class II" apparently should be Class III
3.0-1	4	"100" should be "110" as the number of underground parking spaces provided for the hotel
5.0-15	3	"proposed project" in the last line should read "Applicant's Alternative"
6.0-17 6.0-18	2, 6 2, 3 & 4	References to construction commencement in mid-2009 are not accurate. Edit to refer to construction commencement following approval and recording of final parcel and tract maps, and noting that since the first construction activity for the Project has not yet been determined, construction could very well commence later than 2009.
6.0-23	1	"project" in line 2 should be "Applicant's Alternative"
7.0-29	Table 7.0-8	"proposed project" in last line should be "Applicant's Alternative"
7.0-60	4	"Class II" in last line should be "Class III"
7.0-61	7.7.1.5	Mitigation Measures T-1 and T-2 should be exclusive to the San Remo Easement Relocation.
7.0-63	1	Same as above
8.0-12	3	Double check gross and net sq.ft. 14, 594g / 14,254n, here and throughout DEIR
8.0-24		Throughout the Applicant Alternative Section be clear that the "office building alternative" is not the "proposed office building"
8.0-28	3	Should Figure 8.0-1 be 8.0-14?
8.0-33	8.7.3	End of last sentence on page should read- "for the proposed hotel"
8.0-35	Last	Second line "Either project" should state "Both the project and Applicant Alternative..."

8.0-35	1, 3	<i>“less than significant (Class II)”</i> should be <i>“less than significant (Class III)”</i>
9.0-17	3	Need to reflect that the USSS are guidelines not policy
10.0-5	1	First line need to strike “single-family”
10.0-11	5	consideration “off” access should be consideration “of” access
11.0-20	4	“northern half of eastern edge of the project site” should be rephrased as the “portion of the easterly boundary of project site abutting the San Remo condominium complex”

Exhibit C
ATE Memorandum



ASSOCIATED TRANSPORTATION ENGINEERS

100 N. Hope Avenue, Suite 4, Santa Barbara, CA 93110 • (805) 687-4418 • FAX (805) 682-8509

Since 1978

Richard L. Pool, P.E.
Scott A. Schell, AICP, PTP

MEMORANDUM

May 21, 2009

07061M01.WP

To: Greg Parker, Investec
ATE file

From: Scott A. Schell, AICP, PTP
Associated Transportation Engineers

Delivered Via Email

Subject: Sandman Inn Project - Left-Turn Access

ATE reviewed the Sandman Inn Redevelopment Project DEIR (April 2009) with respect to allowing eastbound left-turn access into the site. The EIR states,

"As shown in Figure 7.0-10, PM Peak Hour Stacking in Westbound Left-Turn Lane, State Street and Hitchcock Way, the westbound left-turn lane at the State Street and Hitchcock Way intersection already occasionally fills during the peak hours. Anecdotal data and field observation indicated that the queues in this westbound left-turn lane extend briefly into the adjacent through lanes during the PM peak hour. With the potential to add more traffic to this turn lane by background traffic growth and cumulative projects, and with any future restriction of mid-block left turns along State Street, the queues in this turn lane will very likely get longer and require additional stacking spaces. Providing the left-turn access for the site's proposed residential driveway would eliminate the potential to extend the westbound left-turn lane at the State Street and Hitchcock Way intersection as the lanes would be back-to-back as previously shown in Figure 7.0-8."

ATE recommends that further analysis be prepared to address the left-turn stacking issue, particularly since the findings are based on "*anecdotal data and field observation*". ATE observed operations at the intersection during the P.M. peak period and did not observe westbound left-turn queues spilling into the adjacent through lanes. In addition, our offices are located in the Upper State Street area and we have not observed the westbound left-turn queue spilling into the adjacent through lanes during our regular use of the intersection.

Engineering • Planning • Parking • Signal Systems • Impact Reports • Bikeways • Transit

In order to more fully evaluate this issue, ATE developed a model of the intersections operation using the SYNCHRO software program. SYNCHRO implements the Highway Capacity Manual operations method and produces level of service, delays and queue forecasts. The model is based on the existing signal timing within the Upper State Street corridor (actuated-coordinated system with 120 second background cycle length). Based on Cumulative + Project P.M. peak hour traffic volumes presented in the DEIR, the model predicts a 95th percentile queue of 163 feet (worksheet attached). The existing left-turn pocket provides over 200 feet of storage. Given this queue, there is adequate space to provide the left-turn access into the residential portion of the project. The 95th percentile queue is what is typically used for design purposes.

A second model run was completed assuming the Cumulative + Project P.M. peak hour traffic volumes plus a 10% increase in westbound left turns at the State Street/Hitchcock Way intersection. This model predicts a 95th percentile queue of 191 feet (worksheet attached). Again, there would be adequate space to provide the left-turn access into the residential portion of the project assuming the increased left turns.

Providing the left-turn access into the residential portion of the project would not "eliminate the potential to extend the westbound left-turn lane at the State Street and Hitchcock Way intersection", as stated in the DEIR. The City could chose to eliminate the left-turn into the project site and extend the westbound left-turn pocket in the future as part of a more comprehensive Upper State Street median project in the future.

Finally, a raised median could be provided on State Street east of the left-turn opening as part of the project. The raised median east of the opening would allow for the necessary signage (No U-Turn sign) as well as landscaping.

Cumulative + Project P.M. Peak
1: State Street & Hitchcock

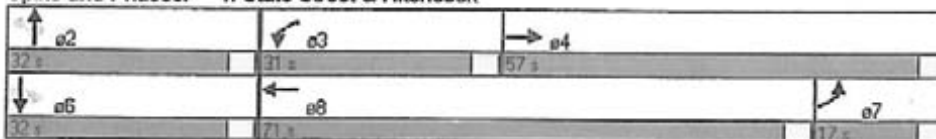
Lanes, Volumes, Timings
5/21/2009

	↖	→	↘	↙	←	↖	↙	↑	↗	↘	↓	↘
Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↖	↖↗		↖	↖↗			↖	↖		↖	↖
Total Lost Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Satd. Flow (prot)	1770	3479	0	1770	3525	0	0	1785	1583	0	1807	1583
Flt Permitted	0.950			0.950				0.658			0.757	
Satd. Flow (perm)	1770	3479	0	1770	3525	0	0	1226	1583	0	1410	1583
Satd. Flow (RTOR)		14			4				188			39
Volume (vph)	52	920	115	193	839	23	110	17	173	55	33	36
Confl. Peds. (#/hr)												
Confl. Bikes (#/hr)												
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Growth Factor	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Heavy Vehicles (%)	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%
Bus Blockages (#/hr)	0	0	0	0	0	0	0	0	0	0	0	0
Parking (#/hr)												
Mid-Block Traffic (%)		0%			0%			0%			0%	
Lane Group Flow (vph)	57	1125	0	210	937	0	0	138	188	0	96	39
Turn Type	Prot			Prot			Perm		Perm	Perm		Perm
Protected Phases	7	4		3	8			2			6	
Permitted Phases							2		2	6		6
Total Split (s)	17.0	57.0	0.0	31.0	71.0	0.0	32.0	32.0	32.0	32.0	32.0	32.0
Act Effect Green (s)	21.2	59.7		20.3	58.8			28.0	28.0		28.0	28.0
Actuated g/C Ratio	0.18	0.50		0.17	0.49			0.23	0.23		0.23	0.23
v/c Ratio	0.18	0.65		0.70	0.54			0.48	0.37		0.29	0.10
Control Delay	29.1	6.7		64.4	3.3			46.4	7.4		40.8	11.7
Queue Delay	0.0	0.1		0.0	0.0			0.0	0.0		0.0	0.0
Total Delay	29.1	6.7		64.4	3.3			46.4	7.4		40.8	11.7
LOS	C	A		E	A			D	A		D	B
Approach Delay		7.8			14.5			23.9			32.4	
Approach LOS		A			B			C			C	

Intersection Summary









Cycle Length: 120
 Actuated Cycle Length: 120
 Offset: 77 (64%), Referenced to phase 4:EBT and 7:EBL, Start of Green
 Control Type: Actuated-Coordinated
 Maximum v/c Ratio: 0.70
 Intersection Signal Delay: 13.6
 Intersection Capacity Utilization 63.4%
 Analysis Period (min) 15
 Intersection LOS: B
 ICU Level of Service B

Splits and Phases: 1: State Street & Hitchcock



Cumulative + Project P.M. Peak
1: State Street & Hitchcock

Queues
5/21/2009

								
Lane Group	EBL	EBT	WBL	WBT	NBT	NBR	SBT	SBR
Lane Group Flow (vph)	57	1125	210	937	138	188	96	39
v/c Ratio	0.18	0.65	0.70	0.54	0.48	0.37	0.29	0.10
Control Delay	29.1	6.7	64.4	3.3	46.4	7.4	40.8	11.7
Queue Delay	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	29.1	6.7	64.4	3.3	46.4	7.4	40.8	11.7
Queue Length 50th (ft)	42	95	119	37	93	0	62	0
Queue Length 95th (ft)	m66	119	m163	m45	160	59	112	29
Internal Link Dist (ft)		547		1132	196		154	
Turn Bay Length (ft)	150		200			100		100
Base Capacity (vph)	313	1737	398	1970	286	514	329	399
Starvation Cap Reductn	0	41	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.18	0.65	0.53	0.48	0.48	0.37	0.29	0.10

Intersection Summary

m Volume for 95th percentile queue is metered by upstream signal.

Cumulative + Project P.M. Peak + 10% Increase LT volumes
1: State Street & Hitchcock

Lanes, Volumes, Timings
5/21/2009

Lane Group	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↖	↕	↗	↖	↕	↗	↖	↕	↗	↖	↕	↗
Total Lost Time (s)	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Satd. Flow (prot)	1770	3479	0	1770	3525	0	0	1785	1583	0	1807	1583
Flt Permitted	0.950			0.950				0.658			0.757	
Satd. Flow (perm)	1770	3479	0	1770	3525	0	0	1226	1583	0	1410	1583
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Confl. Peds. (#/hr)												
Confl. Bikes (#/hr)												
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Growth Factor	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Heavy Vehicles (%)	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%
Bus Blockages (#/hr)	0	0	0	0	0	0	0	0	0	0	0	0
Parking (#/hr)												
Mid-Block Traffic (%)		0%			0%			0%			0%	
Lane Group Flow (vph)	62	1125	0	230	937	0	0	138	188	0	96	39
Turn Type	Prot			Prot			Perm		Perm	Perm		Perm
Protected Phases	7	4		3	8			2		6		6
Permitted Phases							2		2		6	6
Total Split (s)	15.0	55.0	0.0	33.0	73.0	0.0	32.0	32.0	32.0	32.0	32.0	32.0
Act Effct Green (s)	17.5	58.0		22.0	62.5			28.0	28.0		28.0	28.0
Actuated g/C Ratio	0.15	0.48		0.18	0.52			0.23	0.23		0.23	0.23
v/c Ratio	0.24	0.67		0.71	0.51			0.48	0.37		0.29	0.10
Control Delay	30.6	7.4		65.8	3.0			46.4	7.4		40.8	11.7
Queue Delay	0.0	0.1		0.0	0.0			0.0	0.0		0.0	0.0
Total Delay	30.6	7.5		65.8	3.0			46.4	7.4		40.8	11.7
LOS	C	A		E	A			D	A		D	B
Approach Delay		8.7			15.4			23.9			32.4	
Approach LOS		A			B			C			C	

Intersection Summary









Cycle Length: 120
 Actuated Cycle Length: 120
 Offset: 76 (63%), Referenced to phase 4:EBT and 7:EBL, Start of Green
 Control Type: Actuated-Coordinated
 Maximum v/c Ratio: 0.71
 Intersection Signal Delay: 14.4
 Intersection Capacity Utilization 64.5%
 Analysis Period (min) 15
 Intersection LOS: B
 ICU Level of Service C

Splits and Phases: 1: State Street & Hitchcock

↑ a2 32 s	↖ a3 33 s	→ a4 55 s
↓ a6 32 s	← a8 73 s	↗ a7 15 s

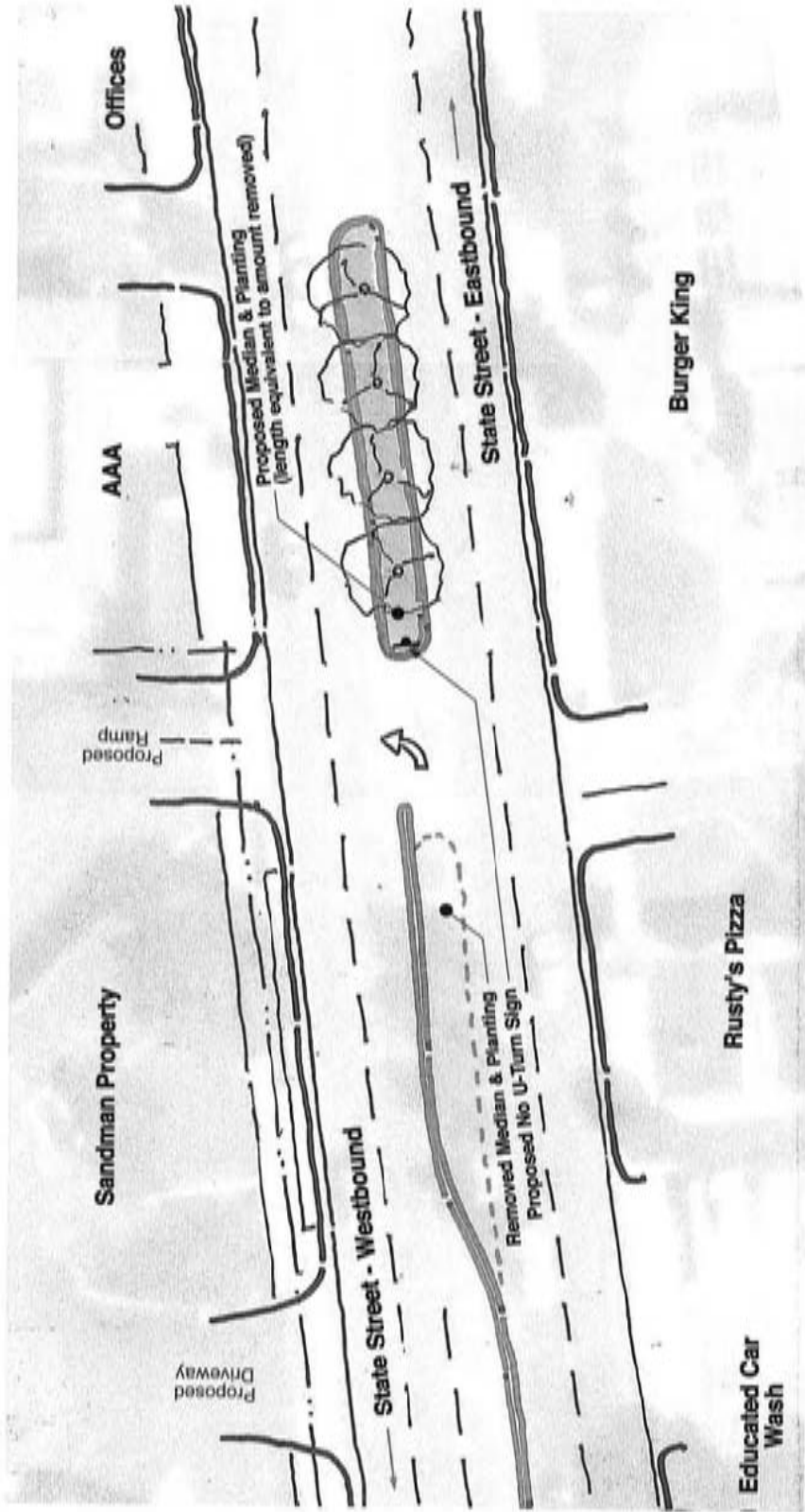
Cumulative + Project P.M. Peak + 10% Increase LT volumes
 1: State Street & Hitchcock

Queues
 5/21/2009

								
Lane Group	EBL	EBT	WBL	WBT	NBT	NBR	SBT	SBR
Lane Group Flow (vph)	62	1125	230	937	138	188	96	39
w/c Ratio	0.24	0.67	0.71	0.51	0.48	0.37	0.29	0.10
Control Delay	30.6	7.4	65.8	3.0	46.4	7.4	40.8	11.7
Queue Delay	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	30.6	7.5	65.8	3.0	46.4	7.4	40.8	11.7
Queue Length 50th (ft)	46	96	131	39	93	0	62	0
Queue Length 95th (ft)	m74	117	m191	m42	160	59	112	29
Internal Link Dist (ft)		547		1132	196		154	
Turn Bay Length (ft)	150		200			100		100
Base Capacity (vph)	258	1689	428	2029	286	514	329	399
Starvation Cap Reductn	0	36	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0
Reduced w/c Ratio	0.24	0.68	0.54	0.46	0.48	0.37	0.29	0.10

Intersection Summary

m Volume for 95th percentile queue is metered by upstream signal.



EIR Additional Information - Conceptual Median Diagram
EXHIBIT D



Sandman Inn Redevelopment & Condominium Project

Exhibit E
Sandman Traffic Studies

Date	Report Name
11/13/07	ATE - Revised Trip General Analysis
10/18/07	ATE - Trip Generation Analysis
09/18/07	ATE - Sandman Inn EIR – Trip Generation Analysis for the Developer Sponsored Alternative
03/03/06	ATE - Supplemental Analysis of the Access Alternatives for the Proposed Sandman Inn Redevelopment Project
02/14/06	ATE - Supplemental Analysis of the Access Alternatives for the Proposed Sandman Inn Redevelopment Project
02/13/06	ATE - Traffic & Parking Analysis of San Remo Drive Access for the Town & Country Apartment Complex
12/09/05	ATE - Analysis of San Remo Drive Access for the Town & Country Apartment Complex
08/19/05	ATE - Traffic & Circulation Study – Sandman Inn
11/19/04	ATE - Analysis of Access Alternatives for the Proposed Sandman Inn Redevelopment Project
05/18/04	ATE - Response to City Staff Comments on the Sandman Inn Traffic & Circulation Study
01/27/04	ATE - Traffic & Circulation Study Sandman Inn Redevelopment Project
01/23/04	ATE - Traffic & Circulation Study Sandman Inn Redevelopment Project
11/21/03	ATE - Supplemental Traffic & Circulation Analysis for the Proposed Sandman Inn Redevelopment Project
04/10/03	ATE - Traffic & Circulation Study Sandman Inn Redevelopment Project
03/28/03	ATE - Draft Traffic & Circulation Study Sandman Inn Redevelopment Project

Bold items included in Draft EIR reference



Driveway spacing along State Street from La Cumbre Rd. to Alamar Ave.

EXHIBIT F

Sandman Inn Redevelopment & Condominium Project

EXHIBIT G: LANDSCAPE RESPONSE

Clarification and Comments in Response to the Land Use and Visual Aesthetics Analysis in the Sandman Redevelopment Project EIR, April 2009

By Susan Van Atta, ASLA, Landscape Architect, May 21, 2009

Introduction

The proposed Sandman Redevelopment Project includes significant landscaping in greater abundance and quality than currently exists. Asphalt paving and buildings cover the site now, resulting in limited landscape opportunities. The aging Mexican Fan Palms, referred to in the EIR as skyline trees, have outgrown the original design intention to provide interest around the pool areas and enhance the landscape experience on-site. Although some of the single palms frame views from offsite to the foothill backdrop, the large overgrown clumps serve to block the distant mountain views from some vantage points. To create a pedestrian friendly environment, much of the landscape is planned over underground parking, although significant areas of landscape will occur in the ground.

This exhibit presents information regarding the number and effect of new trees, the proposed use of skyline trees in the applicant alternative, and the ability to provide significant landscape over parking and in the ground.

PROPOSED NEW TREES

Many more trees than now exist are included in the base and applicant alternative projects (See figure 1). Further, these trees provide additional desirable qualities balanced throughout the site including human scale, shade, privacy, fruit, and flowers, in addition to skyline trees to be viewed from cars driving by.

SKYLINE TREES

The creation of a new landscape provides the opportunity to frame views with a more artful palm placement than now exists. New skyline trees have always been a part of the base project and the applicant alternative. While the base project proposal still relocates fewer skyline trees, the applicant alternative has been revised to include most, if not all, of the existing skyline trees to the extent that they will frame or enhance distant mountain views (see potential examples in figures 2 and 3). Where ever feasible in the context of framing views, mature trees will be left in place. Those under evaluation include all of the trees along State Street consisting of palms, Jacarandas, a Coral Tree, and a Blue Atlas Cedar. The mature Mexican Fan Palms and Queen Palms can all be transplanted in the ground along the generous frontage setback, in and around the parking lot, and around the perimeter of the site. Palms transplant very successfully and have a relatively small root mass, making this easier to accomplish. The remaining smaller, yet interesting, palms that occur throughout the site will be planted above parking, along with 225 new canopy trees.

LANDSCAPE OVER PARKING AND IN THE GROUND

Significant areas over parking and in the ground will be landscaped (see figures 4 and 5). Further, the landscape over parking can attain a size and quality equal to that of

landscape growing in the ground, and this is commonplace throughout the world. Techniques for planting over structures excerpted from the book, Roof Gardens: History, Design, and Construction, by Theodore Osmundson, FASLA, 1999 are attached (See figures 6 and 7). This book provides many examples of successful landscapes over structures that have been in place for decades. Photos in this book, and others taken by our office of projects in California, are found on figures 8, 9, and 10. Please see the captions on these photos for more details.

FIGURE 1: SANDMAN INN REDEVELOPMENT TREES

TREES TO REMAIN IN PLACE

	EXISTING	APPLICANT ALTERNATIVE	BASE PROJECT
Trees	23	6	0
Palms	125	24	0
Total:	148	30	0

Note: 57 Large Shrubs and other plants included in original Tree Inventory

REMAINING PALMS TO BE TRANSPLANTED

	EXISTING	APPLICANT ALTERNATIVE	BASE PROJECT
Palms			
Mexican Fan Palm	38	38	0
Queen Palm	32	32	3
Other Palms	31	31	0
Total:	101	101	3

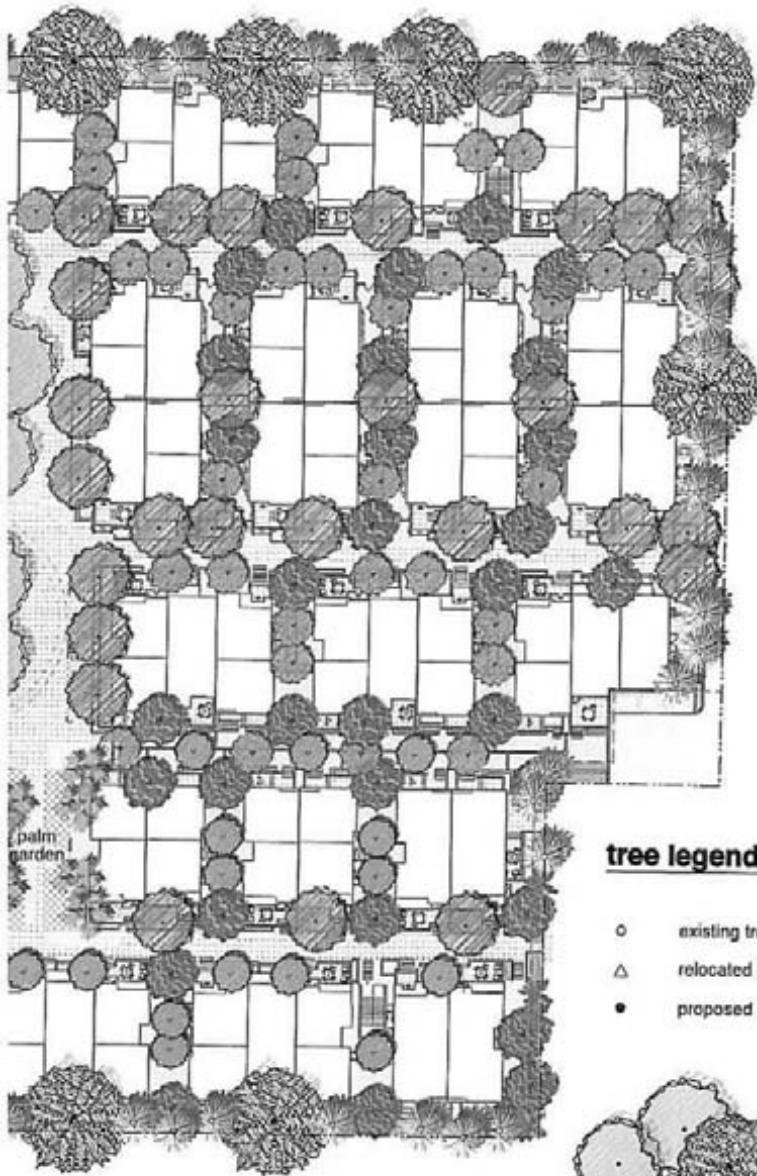
TOTAL NUMBER OF TREES

	EXISTING	APPLICANT ALTERNATIVE	BASE PROJECT
Trees to Remain in Place	23	6	0
Palms to Remain in Place	125	24	0
Palms Transplanted On-Site	-	101	3
Proposed Canopy/Fruit Trees	-	225	248
Total:	148	356	251



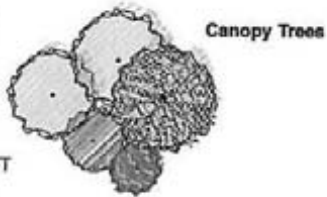
VAN ATTA Associates, Inc.
landscape architecture + planning

235 PALM AVENUE • SANTA BARBARA, CALIFORNIA 93101 • (805) 730-7441 • FAX (805) 730-7446 • EMAIL: VAN.ATTA@VAN.ATTA.COM • CL#2928



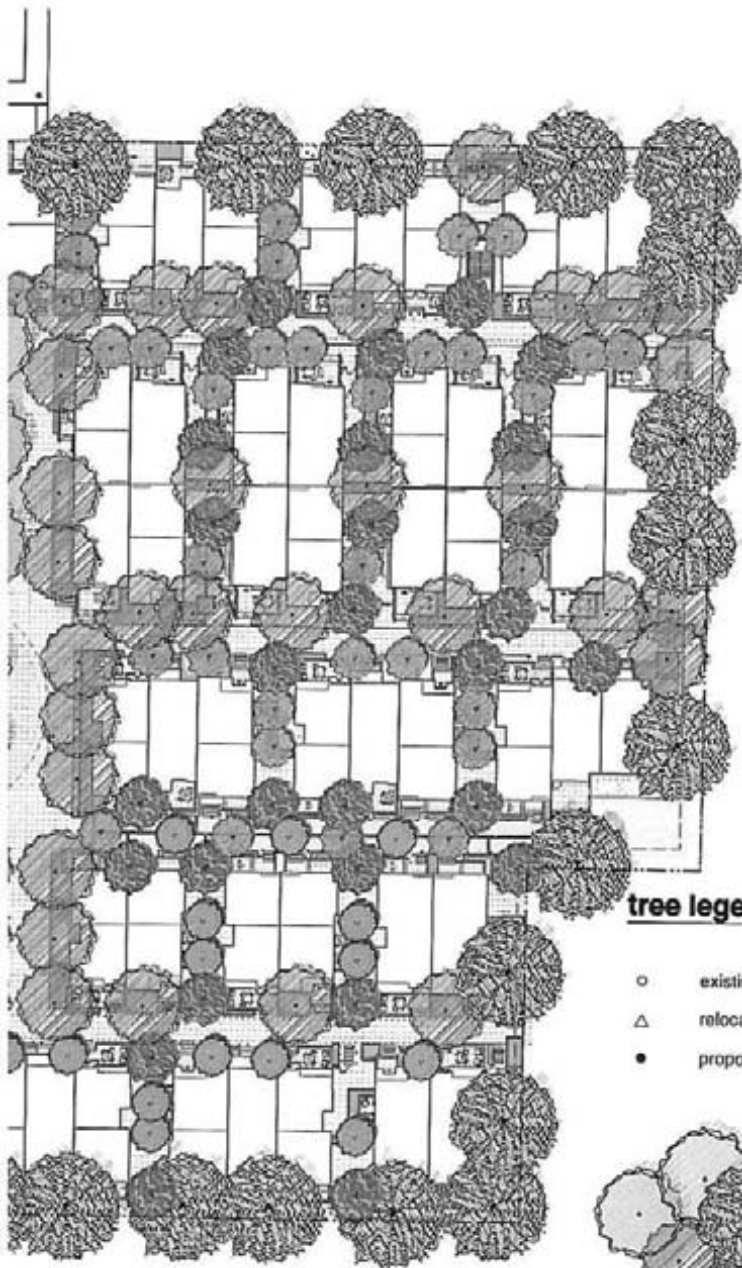
tree legend

- existing tree to remain
- △ relocated palm from on-site
- proposed tree



0 25 50 FT





tree legend

- existing tree to remain
- △ relocated palm from on-site
- proposed tree

Canopy Trees



Fruit Trees



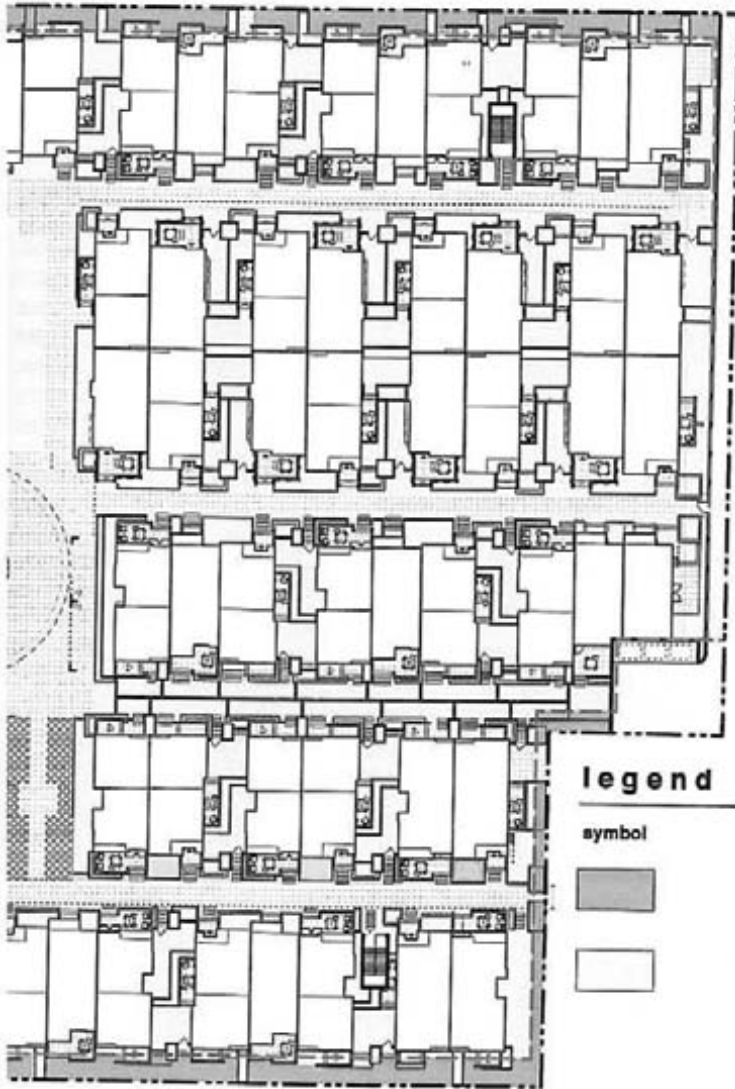
Palms
Queen Palm

Mexican Fan Palm

Specimen Palm

0 25 50 FT



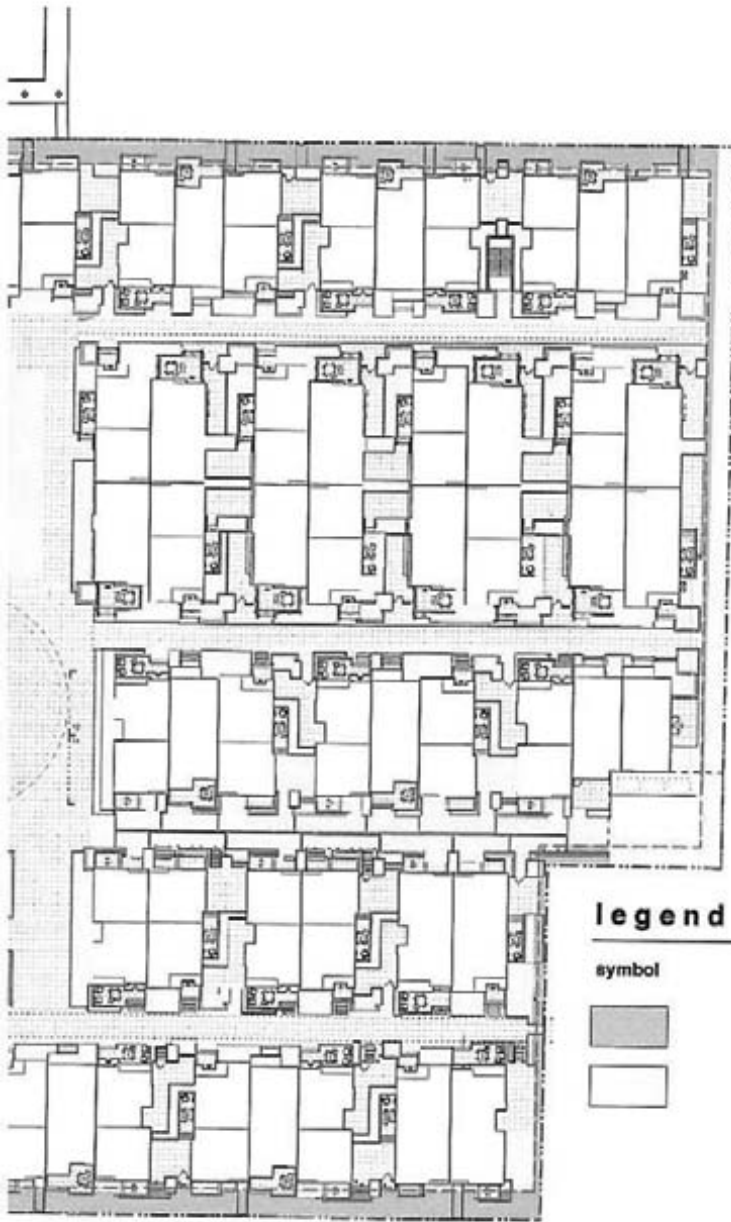


legend



symbol	description	area
	area of planters in ground	19,526 sf.
	area of planters over parking	34,048 sf.

0 25 50 FT





legend

symbol	description	area
	area of planters in the ground	8,186 sf.
	area of planters over parking	26,200 sf.

0 25 50 FT



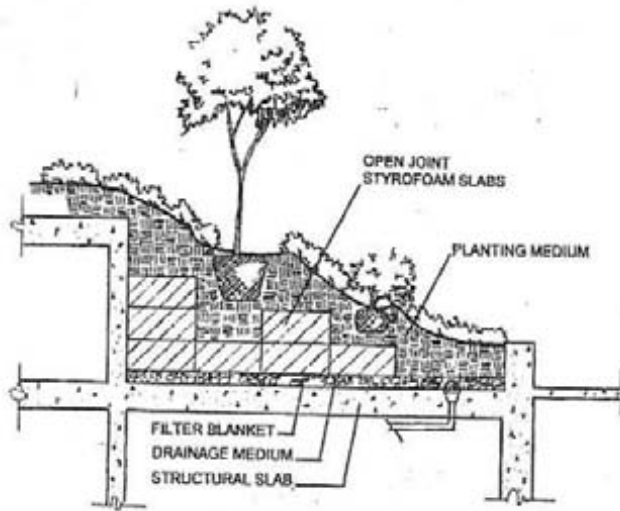
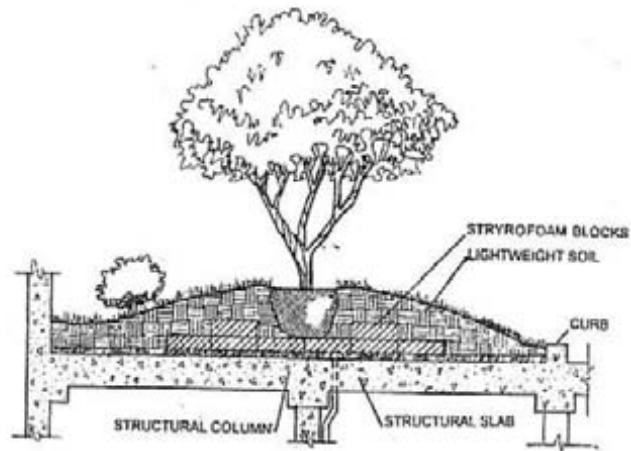
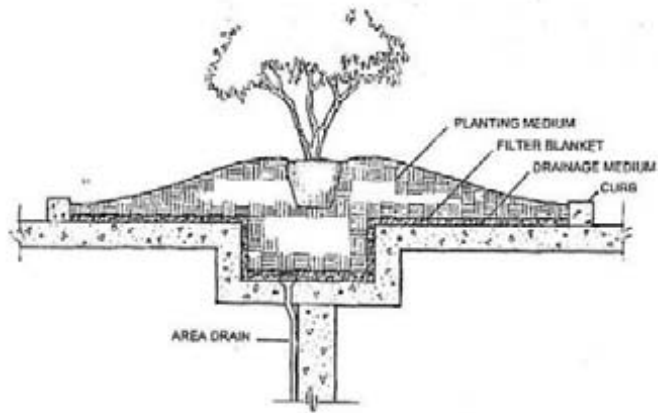


FIGURE 6: MEANS OF PLANTING OVER STRUCTURES

from, "Roof Gardens: History, Design, and Construction", 1999, Theodore Osmundson, FASLA

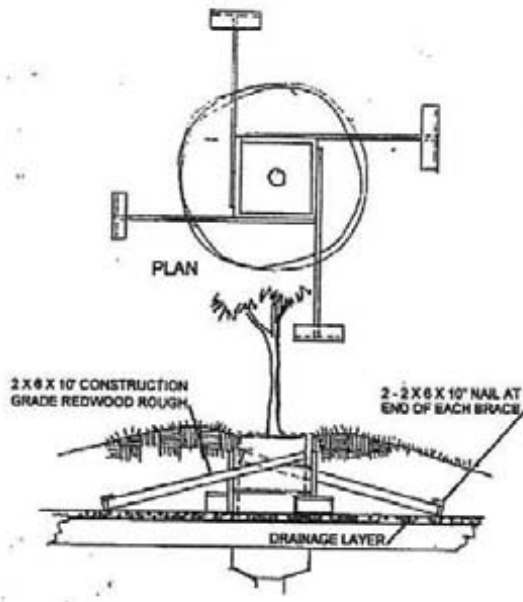


FIGURE 7: MATURE PALMS PLANTED OVER STRUCTURE IN LOS ANGELES & DETAIL



FIGURE 8: NEW SANTA BARBARA LANDSCAPE OVER PARKING



FIGURE 9: ST. MARY'S SQUARE IN SAN FRANCISCO:
HEAVILY USED PARK CREATED OVER 50 YEARS AGO ABOVE A PARKING GARAGE

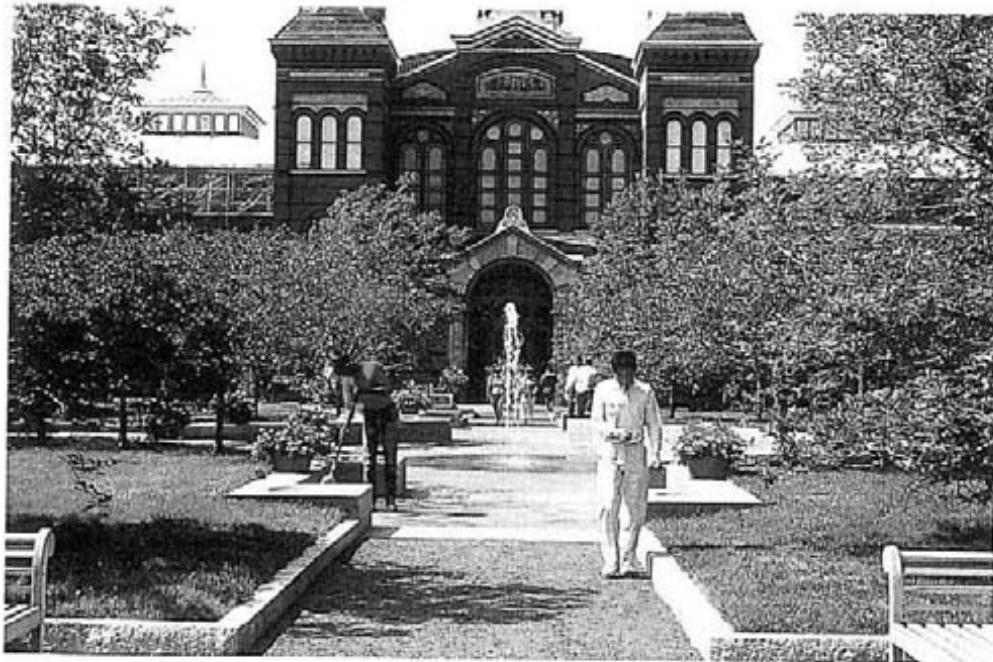
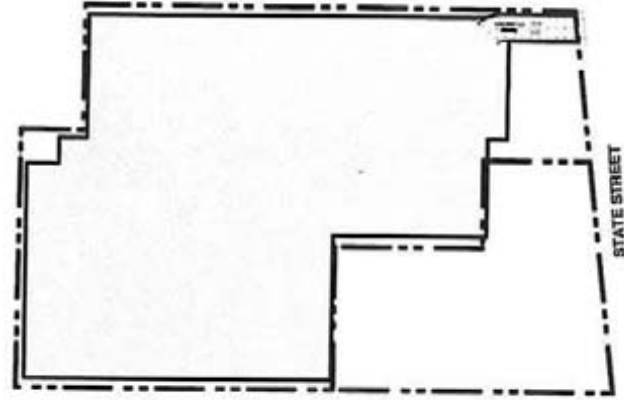
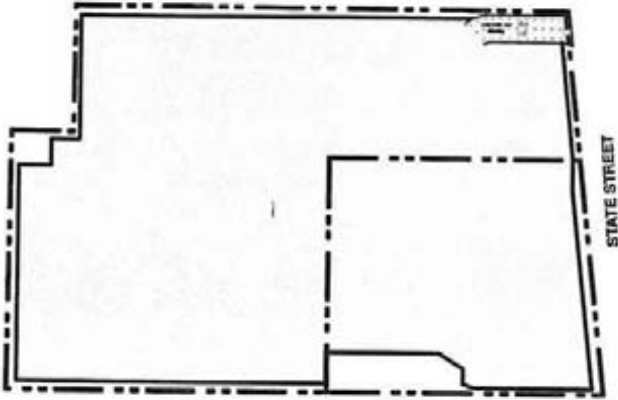


FIGURE 10: GARDENS OVER STRUCTURE AT THE SMITHSONIAN INSTITUTE



APPLICANT ALTERNATIVE
 • Combined Lot Area: +/- 4.59 Ac
 • Underground Parking Area: +/- 3.05 Ac
 • Lot Area - Underground Parking Area = +/- 1.52 Ac



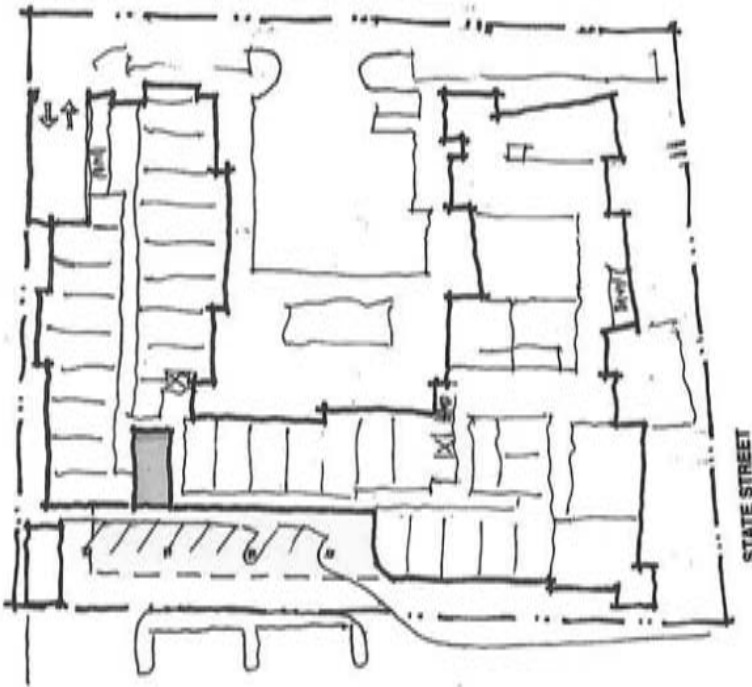
BASE PROJECT
 • Combined Lot Area: +/- 4.59 Ac
 • Underground Parking Area: +/- 4.14 Ac
 • Lot Area - Underground Parking Area = +/- .44 Ac

□ (P) underground parking garage area

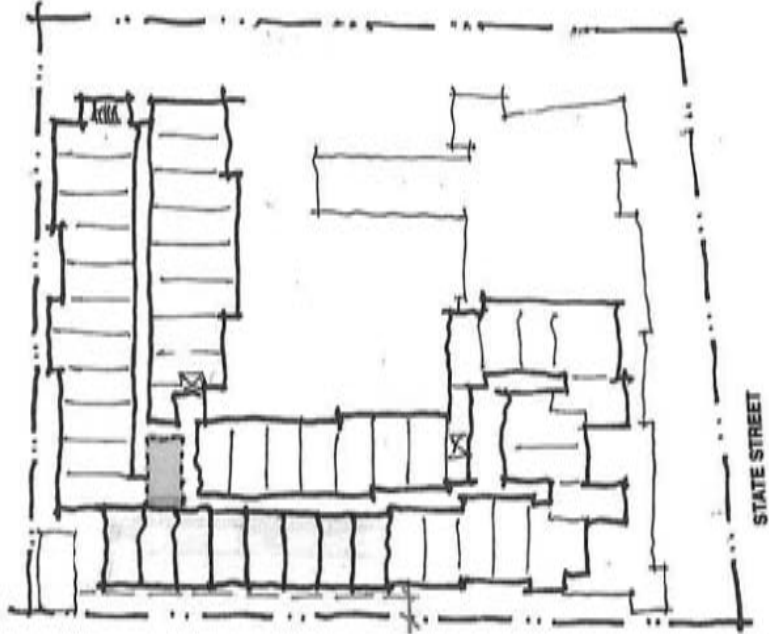
Lot and Underground Garage Area Calculations **EXHIBIT H**



Sandman Inn Redevelopment & Condominium Project



Ground Floor Plan



Second Floor Plan

- Hotel room location not feasible
- Area of addition above
- Added hotel rooms
- 5'-0" setback



EIR Alternative Analysis Diagram
EXHIBIT I

Sandman Inn Redevelopment & Condominium Project

Comment Letter No. 15, Investec, May 22, 2009

Response 15-1

As the Lead Agency under CEQA, the City determined the project objectives presented in the Draft EIR. While applicant input was considered in the process of developing project objectives, the City's judgment is that the objectives in the Draft EIR are appropriate.

Response 15-2

We concur that the project would not have a negative impact on the City's jobs/housing ratio. See

Response 2-4.

Response 15-3

The commenter identifies additional benefits that may be considered as important tradeoffs in support of allowing the development of three-story structures. Many of these were previously discussed in **Section 10.0, Long-Term Implications of the Project**, of the EIR.

As discussed in the EIR, the determination of whether the benefits are adequate to support permitting the development of three-story structures will be the responsibility of the Planning Commission.

Response 15-4

The commenter identifies City policies with which the proposed project and the applicant's alternative could be consistent. Specifically, General Plan Circulation Element Policy 13.1.1 reads, "Encourage the development of projects that combine and locate residential uses near areas of employment and services." Both the proposed project and the applicant's alternative would develop residential and commercial uses in a manner consistent with this policy.

Circulation Element Policy 13.2 reads, "Without increasing the City wide development potential as provided for in the existing Zoning Ordinance and General Plan, the City shall allow more compact, pedestrian oriented development along major transit corridors." The proposed project provides compact development by locating all parking underground, and the applicant's alternative by locating parking for residential development underground. By removing vehicular traffic from at-grade areas of the project site, and by providing a network of paths and paseos, both the proposed project and the applicant's alternative could be considered pedestrian-oriented, consistent with this policy.

The commenter's characterization of Housing Element Policy 3.1 as supporting infill projects is accurate, although the policy does not specifically refer to the City's need to meet its fair share of regional housing need. The proposed project and the applicant's alternative are both urban infill development and are thus consistent with this policy.

Housing Policies 4.1, 4.3, and 5.2 are considered in **Appendix 5.0, Supplemental Policy Consistency Analysis**, of the EIR. Overall, the proposed project and the applicant's alternative are identified as consistent with Housing Element policies.

Response 15-5

See **Responses 4-1** and **4-2**

Response 15-6

The noted changes have been incorporated in the EIR, except for the following:

- Page 6.0-17 and 6.0-18 have been preserved. The commencement of construction in mid-2009 was part of the original estimate for the project. Using this as the starting year provides a more conservative analysis.
- **Table 7.0-8** has been clarified to indicate that the row shows the difference compared to the proposed project.
- On page 8.0-35 the first paragraph correctly identified the impact as a Class II impact.

Response 15-7

This comment agrees with the EIR's characterization of the applicant's alternative. This comment is noted and no further response is required.

Response 15-8

For purposes of the EIR, the applicant's proposed alternative ("applicant's alternative") was considered as a project eligible for approval by decision makers rather than as an alternative under CEQA. In order to do this, the applicant's alternative was considered at the same level of analysis as the proposed project. The applicant's alternative therefore was not considered as an alternative to the proposed project, but rather was studied at a project level of detail.

Response 15-9

While the applicant's alternative would result in a reduction in trips as compared to existing conditions, the reduction is not considered substantial. The proposed project would result in 215 fewer daily trips, 5 fewer PM peak hour trips, and 25 additional AM peak hour trips, and the applicant's alternative would result in 852 fewer daily trips, 33 fewer PM peak hour trips, and 5 fewer AM peak hour trips as compared to existing conditions. Therefore, traffic impacts for the proposed project and the applicant's alternative are considered less than significant, but are not considered beneficial.

Response 15-10

While the Upper State Street Study (USSS) Guidelines are guidelines and not policies, the direction provided by the City Council after adoption of the USSS was that until formal policies are adopted, the Guidelines are to be used by the City staff and decision making bodies as if they were policies with appropriate discretion in their application.

The suggested raised median openings shown in the USSS for the section of State Street between Ontare and Hitchcock are shown for illustrative purposes only and were not intended to identify any defined or recommended locations for median openings. Any such locations would require additional study by the City to determine feasibility and level of benefit to the corridor. The EIR concludes that due to proximity to the State/Hitchcock intersection and the relatively low traffic volumes anticipated for the Sandman Inn Redevelopment Project, a median opening to allow left turns into the site is not recommended.

Response 15-11

The EIR and associated traffic study (Iteris, 2009) provides an image of the existing westbound left-turn lane at the State/Hitchcock intersection fully occupied during a typical PM peak hour. While the surrounding area is predominantly built out, historical traffic data indicates that volumes along the State Street corridor have increased over the years as a result of various factors including background traffic growth. In addition, if the recommended raised median is provided along State Street in this area, the number of U-turns at the intersections will increase above existing levels. Both of these factors would suggest that there will be additional vehicles using the westbound left-turn lane and that there will be little, if any, additional green time that can be diverted to the accommodate traffic in the westbound left-turn lane at Hitchcock. Therefore, it is logical to assume that longer queues will form in the left-turn lane and that additional storage space could be needed to store those queues to avoid blocking the through lanes.

Allowing a “break” in the existing landscaped median and then removing it at a later date would not be practical as it would cause disruptions twice to traffic operations on State Street and there is no guarantee that the costs for replacement of the median and landscaping would be covered by the applicant in the future. The EIR analysis confirms that the issue of allowing left-turns into the site is a less than significant environmental impact.

Commenter’s reasons for supporting the left turn lane into the residential portion of the project site are noted and will be forwarded on to decision makers.

Response 15-12

The possibility of providing access to the project site from the Hitchcock Way intersection was raised by Commissioner Bartlett at the Planning Commission public hearing (see **Comment PH-25**). Analyzing the feasibility of widening the north approach of the State Street/Hitchcock Way intersection is not part of the project and would be the responsibility of the applicant, as it is beyond the scope of the EIR. Any potential alternative design would require further consideration by the applicant and the City. However, the feasibility of such an action is not supported at a conceptual level by the City's Traffic Engineer due to the increased clearance interval at the intersection and creating driver confusion by creating two adjacent driveways at a signalized intersection.

Response 15-13

Traffic analysis in the Draft EIR was based on the report prepared by Iteris, Inc. in March 2009. While the EIR acknowledges the preparation of previous reports, the analysis relies only on the Iteris report. No further response is required.

Response 15-14

The driveway spacing guidelines provided in the USSS are a guide for dealing with future re-development. A contributing factor to the congested operation of the State Street corridor is the fact that most access driveways along the corridor do not meet these suggested design standards. The intent of the USSS site access recommendations is to increase the distance between consecutive driveways in the future where possible and encourage shared access driveways between adjacent sites and land uses where appropriate as redevelopment of sites occurs. Therefore, it is appropriate that the project access driveway configuration and spacing be reviewed relative to the USSS guidelines, rather than existing conditions. While it is understood that each site must be evaluated on its own merits, the site in the context of the overall Upper State Street environment must also be considered.

The consideration of a single access driveway is not limited to the option that the residential and non-residential uses within the project must share an access driveway. Either portion of the project could share access driveways with the adjacent sites and limit the number of access driveways onto State Street to/from the overall project to a single location.

Commenter's analysis and discussion of the driveway spacing guidelines is noted and will be forwarded to decision makers.

Response 15-15

The commenter notes disagreement with the recommendation that at-grade parking spaces be allocated to the office parking. **Mitigation Measure T-8** has been modified in response to this comment.

Response 15-16

While the original landscape plans provided for the proposed project and the applicant's alternative indicate that existing mature trees will be relocated within the project site as feasible, the landscape plans did not indicate locations for replanting mature trees, nor did they indicate the number of mature trees that would be relocated. Furthermore, no statement regarding the feasibility of relocating mature trees over the proposed underground parking garages was available at the time the Draft EIR was prepared. Therefore, in order to provide a conservative analysis, the Draft EIR assumed that most of the existing mature trees would be removed as part of project development.

As this comment indicates, landscape plans for the proposed project and the applicant's alternative provide substantial new landscaping throughout the project site. However, in preparing the EIR analysis, assumptions were made that replacement plantings would likely be smaller than existing mature trees, which would result in a loss of skyline trees across the project site. As this comment notes, additional information has been provided by the project applicant in the form of an exhibit from the applicant's landscape architect, indicating that relocation of mature trees over underground parking garages would be feasible, and that the project applicant intends to preserve 30 mature trees in their current locations and relocate another 101 such trees within the project site. An additional 225 canopy and fruit trees would be planted as part of the project's landscaping plan.

Based on the new information provided by the applicant at the public hearing conducted for the project and in this comment letter, the proposed project and applicant's alternative would be consistent with policy 4.0 and implementation measures 4.1, 4.2, and 4.3 of the Conservation Element. As discussed in the Draft EIR, the mitigation measures provided, which correspond generally with the additional information provided by the applicant, would reduce impacts related to the previously analyzed inconsistency to less than significant.

These comments are acknowledged and will be forwarded to City decision makers.

Response 15-17

An analysis of the consistency of the proposed project and the applicant's alternative with the Upper State Street Study (USSS) Guidelines is provided in Appendix 5.0, Supplemental Policy Consistency Analysis, of the EIR.

The EIR's characterization of the proposed project and the applicant's alternative as potentially inconsistent with USSS policies regarding the preservation of views is supported by the visual simulations provided in **Section 8.0, Visual Aesthetics**, of the Draft EIR.

While the applicant's alternative could potentially make certain scenic views available, depending on the relocation of mature trees within the project site, the elimination of existing views could be considered potentially inconsistent with policies supporting the preservation of views. Page 1.0-8 has been revised to be more specific relative to the specific guidelines of the USSS that the project may be inconsistent with. The City Planning Commission will determine the consistency of the proposed project and the applicant's alternative with USSS policies.

Response 15-18

The landscape plans prepared for the proposed project and the applicant's alternative indicate that existing trees will be relocated within the project site as feasible. Information provided to the City prior to the public hearing for the project did not indicate which trees would be preserved, how many mature trees would be preserved, or where such preserved trees might be planted, whether over underground parking garages or elsewhere. The EIR conservatively states that planting mature trees above underground parking garages may be possible pending an analysis of its feasibility. The EIR correctly states that all mature trees would be removed for grading and excavation as part of project construction, and the applicant submitted an application for a tree removal permit for the front yard setback in February 2009.

The EIR does not assume that mature trees would only be located in planters above the proposed underground parking garages; rather, it observes that the development of underground parking garages could potentially (pending a feasibility study) pose a constraint to the relocation of existing mature trees. As discussed in **Response 15-16** above, new information provided by the applicant indicates that planting over underground structures would be feasible and that the applicant intends to preserve a total of 131 existing trees as part of project landscaping. No further response is required.

Response 15-19

See **Responses 15-16** and **15-18**. Mitigation Measures VA-1 and VA-2 provide for the relocation of mature trees and the replacement of mature trees, which would reduce impacts to a level less than significant. The additional information provided in the commenter's letter confirms that the mitigation measures identified can be implemented. The additional information provided will assist decision makers in analyzing the project.

Response 15-20

Additional analysis based on new information provided by the applicant at the Planning Commission hearing has been incorporated in **Section 8.0, Visual Aesthetics**, indicating that the proposed preservation of 131 mature trees would be consistent with this policy.

Response 15-21

See **Response 15-20**.

Response 15-22

See **Response 15-20**.

Response 15-23

See **Response 15-20**.

Response 15-24

Implementation strategies 4.1, 4.2, and 4.3 have been identified as such in **Section 8.0, Visual Aesthetics**, in the Final EIR. Additional analysis based on new information provided by the applicant has been incorporated indicating that the proposed preservation of 131 mature trees would be consistent with City policies.

Response 15-25

The additional view corridors identified in this comment could potentially offer views of the Santa Ynez Mountains to the north. However, based on existing landscape plans and the new information provided by the applicant regarding the preservation of 131 mature trees on site, the quality of these view corridors cannot be characterized.

The EIR concludes that impacts related to view would be less than significant with the implementation of recommended mitigation that would require the preservation or replacement of mature trees.

Response 15-26

The recommended change has been made in mitigation measure VA-1.

Response 15-27

The recommended change has been made in mitigation measure VA-2.

Response 15-28

The relocation of access for the Town & Country Apartments to San Remo Drive must occur in order for the proposed development (either the proposed project or the applicant's alternative) to proceed. While said relocation may proceed independently of the redevelopment of the main project site, it is an essential part of the "project" under CEQA, and is therefore considered as such in the EIR.

Response 15-29

This comment states that some of the required mitigation for the proposed driveway at 3715 San Remo Drive cannot be performed by the applicant. The proposed mitigation measures have been changed to reflect this information.

Response 15-30

The recommended change has been made in mitigation measure T-1.

Response 15-31

See response to **Response 15-28**. Commenter is correct that the traffic analysis did not consider the loss of one unit at 3715 San Remo Drive. However, the number of trips associated with this one unit would be minimal, and traffic impacts were determined to be less than significant even including this unit in the analysis.

Response 15-32

The commenter states agreement with the EIR that the residents of the Town & Country Apartments do not appear to park on the existing Sandman Inn property. The comment is noted and no further response is necessary.

Response 15-33

The commenter states that Alternative 2 considered in the EIR is infeasible due to restrictions imposed by an existing easement granted to the owner of the adjacent property to the west of the project site. As discussed in the EIR, the applicant's ability to terminate this easement would affect the feasibility of Alternative 2. This comment will be forwarded to decision makers. No further response is required.

Response 15-34

See response to **Response 15-8**.

Response 15-35

The commenter states that the preservation of a jacaranda in the front setback of the project site under Alternative 3 is infeasible and unnecessary, and may obscure views. This comment is noted and will be forwarded to decision makers. No further response is required.

Response 15-36

The commenter states that Alternative 3 should permit relocation of mature trees from elsewhere within the project site to the front setback area, in lieu of preserving the existing setback trees. This comment is noted and will be forwarded to decision makers. No further response is required.

Response 15-37

The commenter states that Alternative 4, which calls for development of a single driveway serving both portions of the site, is infeasible. See **Response 15-14**. This comment is noted and will be forwarded to decision makers.

From: Isabelle Greene [mailto:iga@isabellegreene.com]
Sent: Friday, May 22, 2009 3:27 PM
To: DeBusk, Allison L.
Subject: Sandman project -MST 2007-00591

Dear Allison,

My comments in reference to the *Sandman Project* relate to two basic ideas:
(1) Housing is a priority need in Santa Barbara future build out.
(2) The City has already maximized many of its resources –notably water, but also streets capacity and many other elements. Therefore, the city's planning cannot afford to encourage and serve visitors/tourists to the depletion of necessities for residents.

- 1
- 2
- 3

Therefore, it seems obvious the hotel project, though esthetically more carefully arranged, needs to secede in favor of houses with shops or offices.

Secondly I believe it most important to keep substantial view-corridors open as connection to our mountains, as well as to use this opportunity to create delightful street frontages. Perhaps ¼ or ½ of the back (North) portion of the project could accommodate 3-story structures, while 2-storys span most of the property's balance. A portion of the State Street frontage should yield to one-story and/or open space (even parking –as long as not directly abutting the street). By example, it has always been a pleasure to pass by the old *Sandman Inn* with its earth-colored low-slung buildings and the mountains lifting up behind.

- 4

Thirdly, I wouldn't want to see the underground parking go away. Acknowledging the cost factor, perhaps the project could be conceived as phased- with the taller buildings providing underground parking at this time- and a future upgrade or intensification planned for later, and at that time undergrounding the rest of the parking.

- 5

Additionally I have seen that combining street-accessible offices and shops with residences above creates a nice community. Some residents and workers then can then walk to their work, while those who drive and park trade off with the others: the residents parking at night, the shoppers/ office workers parking by day. The resultant lower parking requirement can then be translated into more amenities on that land.

- 6

Respectfully,
Isabelle Greene

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 please consider the environment before printing this e-mail

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Comment Letter No. 16, Isabelle Greene, May 22, 2009

Response 16-1

The commenter states support for the development of housing. Comment is noted and no further response is required.

Response 16-2

The commenter states opposition for visitor-attracting development. Comment is noted and no further response is required.

See **Response 3-7**.

Response 16-3

The commenter states support for the proposed applicant alternative over the proposed project. No response is required.

Response 16-4

The commenter notes the importance of retaining view-corridors to mountains open, as well as retaining landscaped street frontages. The commenter identifies where three-story buildings might be appropriate, and suggests one-story buildings or open space along a portion of State Street.

The EIR provides an alternative that reduces the third story portion of the hotel and provides additional step back from State Street. While such an alternative could reduce impacts, the feasibility of the alternative has been questioned. The EIR determined that the three-story residential buildings do not significantly impact mountain views.

The comments are noted and no further response is required.

Response 16-5

The commenter states support for the development of underground parking and suggests other measures for developing the site. The comments are noted and no further response is required.

Response 16-6

The commenter states support for the development of residential and commercial uses in close proximity to each other. The comments are noted and no further response is required.

12.3.2 Responses to Verbal Comments

This section provides responses to the comments made at the May 14, 2009 public hearing on the Draft EIR.

Paul Hernadi, Citizens Planning Association

The applicant's alternative should be identified as environmentally superior.

Residential units are overdeveloped based on a miscalculation of the permitted density.

Mary Louise Days, Citizens Planning Association

The applicant's alternative should be identified as environmentally superior.

Naomi Kovacs, Citizens Planning Association

The single-driveway alternative should be encouraged.

Recreational facilities including a playground and basketball hoop should be included. One condominium should be converted to a recreation/community center.

Mature trees should be retained.

Residential density should be based on the size of the residential parcel only.

Commuters/tourists affect public services.

Jean Holmes, Grove Lane Neighborhood Association

Both the proposed project and the applicant's alternative are too big in terms of density and massing.

Traffic impacts

Both the proposed project and the applicant's alternative would be inconsistent with the surrounding neighborhood.

Setback tree preservation should be the minimum requirement.

Judy Orias, Allied Neighborhood Association

Prefers applicant's alternative

Both the proposed project and the applicant's alternative would contribute to the City's jobs/housing imbalance.

A single access driveway should be encouraged.

Connie Hannah, Santa Barbara League of Women Voters

Prefers the applicant's alternative.

Residential density should be reduced.

Mature trees should be preserved.

Additional open space/recreation facilities are needed.

Commissioner White

Expressed concern over the buffer-zone concept. Suggested the EIR deal with the buffer zone more than it has already.

Commissioner Jacobs

Would have liked to have seen a reproduction copy of the Upper State Street map, and referenced two maps that were created during the Upper State Street Study with one officially adopted as a guideline for the area. Suggested the map be included in the EIR; would show recreation and open space, as well as access to nearby creeks, and parking circulation.

Parking and circulation is a concern with the project, especially connectivity of uses. Would like to see other transportation alternatives such as pedestrian, bus, and bicycle circulation; noted Foothill scenic bikeway is close by.

Would like to see better use of the Hitchcock intersection.

Suggested future connectivity is kept in mind with the adjoining bank property at the time when the bank is redeveloped.

Commissioner Bartlett

Believes the two drivers in this project are the circulation issues, which are in conflict with the Upper State Street Study, and the lack of a buffer. Referenced the vision held in the Master Plan of 1924 that showed the east-west buffer that would have been a continuation of Via Lucero and believes that it should be put back in place in the General Plan Update to address circulation issues. Believes that direct access from Hitchcock and State Street intersection onto the subject property could be achieved.

Commissioner Lodge

Discussed the density being considered on 4.5 acres. The SD-2 overlay zone never considered parking going underground. Concerned with the job-housing balance and would like to know how many jobs are currently provided on site, and how many would be created with the proposed project or applicant's alternative project.

Public Hearing (PH)

Paul Hernadi, Citizens Planning Association

The applicant's alternative should be identified as environmentally superior.

 1

Residential units are overdeveloped based on a miscalculation of the permitted density.

 2

Mary Louise Days, Citizens Planning Association

The applicant's alternative should be identified as environmentally superior.

 3

Naomi Kovacs, Citizens Planning Association

The single-driveway alternative should be encouraged.

 4

Recreational facilities including a playground and basketball hoop should be included. One condominium should be converted to a recreation/community center.

 5

Mature trees should be retained.

 6

Residential density should be based on the size of the residential parcel only.

 7

Commuters/tourists affect public services.

 8

Jean Holmes, Grove Lane Neighborhood Association

Both the proposed project and the applicant's alternative are too big in terms of density and massing.

 9

Traffic impacts

 10

Both the proposed project and the applicant's alternative would be inconsistent with the surrounding neighborhood.

 11

Setback tree preservation should be the minimum requirement.

 12

Judy Orias, Allied Neighborhood Association

Prefers applicant's alternative

 13

Both the proposed project and the applicant's alternative would contribute to the City's jobs/housing imbalance.

 14

A single access driveway should be encouraged.

 15

Connie Hannah, Santa Barbara League of Women Voters

Prefers the applicant's alternative.

16

Residential density should be reduced.

17

Mature trees should be preserved.

18

Additional open space/recreation facilities are needed.

19

Commissioner White

Expressed concern over the buffer-zone concept. Suggested the EIR deal with the buffer zone more than it has already.

20

Commissioner Jacobs

Would have liked to have seen a reproduction copy of the Upper State Street map, and referenced two maps that were created during the Upper State Street Study with one officially adopted as a guideline for the area. Suggested the map be included in the EIR; would show recreation and open space, as well as access to nearby creeks, and parking circulation.

21

Parking and circulation is a concern with the project, especially connectivity of uses. Would like to see other transportation alternatives such as pedestrian, bus, and bicycle circulation; noted Foothill scenic bikeway is close by.

22

Would like to see better use of the Hitchcock intersection.

23

Suggested future connectivity is kept in mind with the adjoining bank property at the time when the bank is redeveloped.

24

Commissioner Bartlett

Believes the two drivers in this project are the circulation issues, which are in conflict with the Upper State Street Study, and the lack of a buffer. Referenced the vision held in the Master Plan of 1924 that showed the east-west buffer that would have been a continuation of Via Lucero and believes that it should be put back in place in the General Plan Update to address circulation issues. Believes that direct access from Hitchcock and State Street intersection onto the subject property could be achieved.

25

Commissioner Lodge

Discussed the density being considered on 4.5 acres. The SD-2 overlay zone never considered parking going underground. Concerned with the job-housing balance and would like to know how many jobs are currently provided on site, and how many would be created with the proposed project or applicant's alternative project.

Response PH-1

See **Response 3-2**.

Response PH-2

See **Response 3-9**.

Response PH-3

See **Response 3-2**.

Response PH-4

The comment is noted and will be forwarded to decision makers. No further response is required.

Response PH-5

See **Response 2-3**.

Response PH-6

The EIR includes mitigation measures requiring the retention of on-site mature trees to the extent feasible.

Response PH-7

See **Response 3-9**.

Response PH-8

See **Response 3-7**.

Response PH-9

The proposed project and applicant's alternative meet City zoning standards. This comment will be forwarded to decision makers.

Response PH-10

As discussed in the EIR, the proposed project would result in 215 fewer daily trips, 5 fewer PM peak hour trips, and 25 additional AM peak hour trips, and the applicant's alternative would result in 852 fewer daily trips, 33 fewer PM peak hour trips, and 5 fewer AM peak hour trips as compared to existing conditions. Levels of service at study intersections would fall within City standards, and impacts would be less than significant.

Response PH-11

As discussed in **Section 5.0, Land Use and Policy Consistency**, of the EIR, the proposed project and the applicant's alternative are both consistent with the general plan Land Use Map and zoning designations for the project site. The project requires design review by the Architectural Board of Review to ensure compatibility with surrounding development. This comment will be forwarded to decision makers.

Response PH-12

Section 8.0, Visual Aesthetics, of the EIR includes mitigation measures requiring the retention of on-site mature trees to the extent feasible. Where trees could not feasibly be relocated on site, replacement plantings would be required on a one-to-one basis. This comment will be forwarded to decision makers.

Response PH-13

The commenter's preference for the applicant's alternative is noted and will be forwarded to City decision makers.

Response PH-14

See **Response 2-4**.

Response PH-15

The comment is noted and will be forwarded to decision makers.

Response PH-16

The comment is noted and will be forwarded to decision makers.

Response PH-17

See **Response 3-9**. The comment is noted and will be forwarded to decision makers.

Response PH-18

Section 8.0, Visual Aesthetics, of the Draft EIR includes mitigation measures requiring the retention of on-site mature trees to the extent feasible. The project applicant would be required to preserve existing mature trees to the extent feasible. Where trees could not feasibly be relocated on site, replacement plantings would be required on a one-to-one basis.

Response PH-19

See **Response 2-3**.

Response PH-20

See **Responses 4-1 and 4-2**.

Response PH-21

The Upper State Street Study urban design recommendations map has been added as **Figure 12.0-1**.

Response PH-22

Parking and circulation for the proposed project and the applicant's alternative, as discussed in **Section 7.0, Transportation and Circulation**, would, with the implementation of provided mitigation measures, meet City standards and result in no significant and unavoidable impacts. The proposed project and the applicant's alternative would provide sidewalk improvements, including widening the pedestrian right-of-way to bring it into conformance with City standards. A proposed new bus stop would provide a new public transit facility.

Response PH-23

An alternative use of the Hitchcock Way intersection was raised by Commissioner Bartlett (see **Comment PH-25**). However, as discussed in **Response 15-12**, the feasibility of such an action is not supported at a conceptual level by the City's Traffic Engineer due to the increased clearance interval at the intersection and creating driver confusion by creating two adjacent driveways at a signalized intersection.

Response PH-24

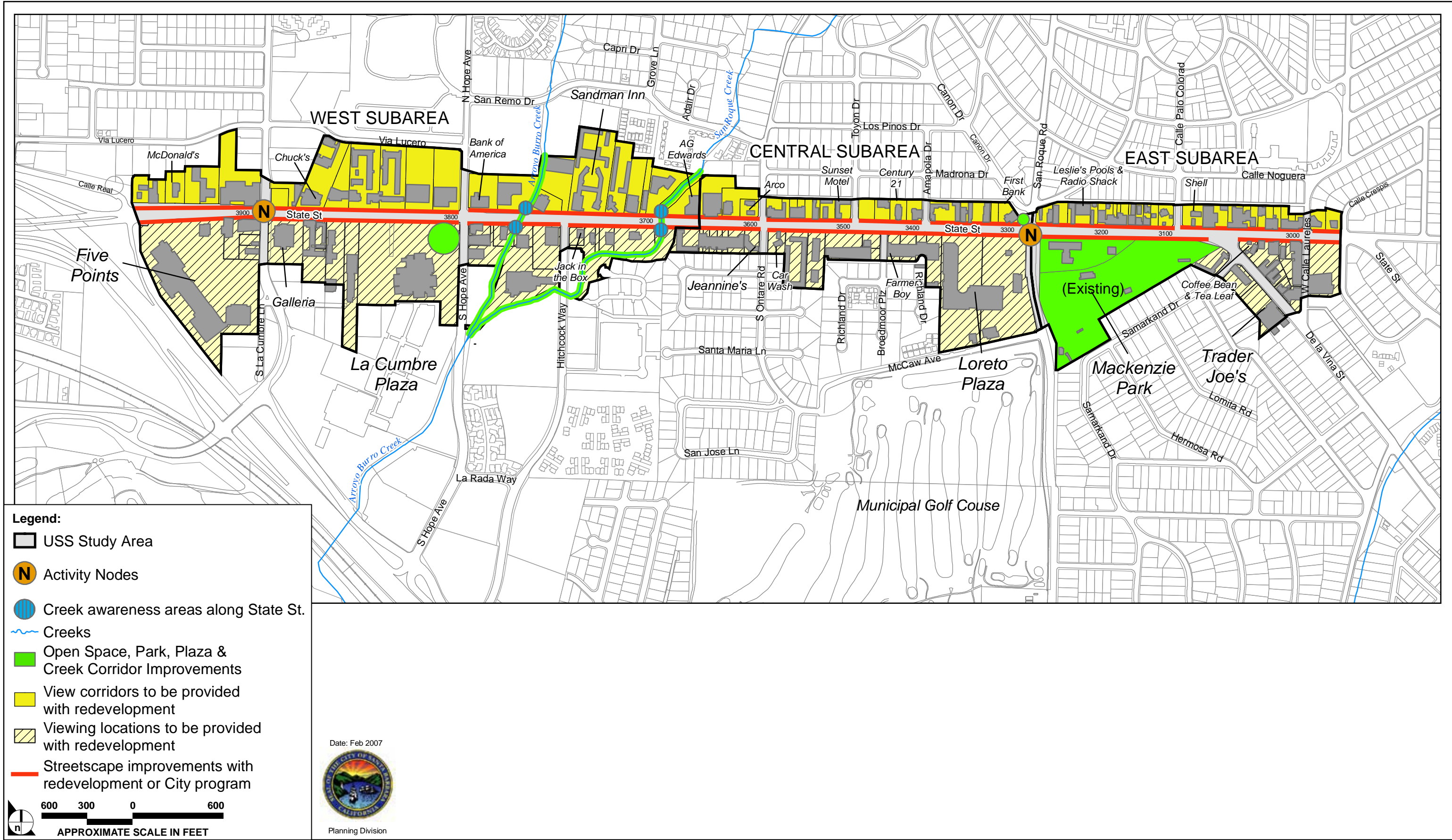
The proposed project would likely prevent the provision of shared access with the adjacent property to the west, as structures would be located along the western site boundary. The applicant's alternative could potentially share access with the adjacent property to the west via the parking lot for the office buildings.

Response PH-25

Regarding the implementation of the Buffer zone, see **Responses 4-1** and **4-2**. Regarding the suggested access from Hitchcock Way, see **Response 15-12**.

Response PH-26

As discussed in **Section 5.0, Land Use and Policy Consistency**, and in **Response 14-8**, the proposed project and the applicant's alternative would be consistent with the development standards of the S-D-2 zone. Regarding the City's jobs/housing balance, see **Response 2-4**.



SOURCE: Santa Barbara Planning Division - February 2007

FIGURE 12.0-1

Upper State Street Study Urban Design Recommendations Map

13.0 CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

INTRODUCTION

This section lists the revised pages of the draft environmental impact report (EIR) in response to comments noted in **Section 12.0** of the final EIR. All new text appears in “double underline type” and all deleted text appears in “~~striketrough~~” type.

Changed pages include the following:

1.0-1	7.0-68
1.0-3	8.0-11 through 8.0-13
1.0-4	8.0-20 through 8.0-21
1.0-6 through 1.0-8	8.0-25 through 8.0-29
2.0-3	8.0-34 through 8.0-36
2.0-8	9.0-11
3.0-1 through 3.0-2	9.0-17
5.0-8 through 5.0-10	10.0-5
5.0-14 through 5.0-15	10.0-11
5.0-18 through 5.0-19	10.0-20 through 10.0-22
6.0-5 through 6.0-6	11.0-20
6.0-23	14.0-3
6.0-27 through 6.0-28	14.0-10 through 14.0-11
7.0-29	14.0-27
7.0-37	14.0-30
7.0-60 through 7.0-61	14.0-33
7.0-63	16.0-1 through 16.0-3

14.0 MITIGATION MONITORING PROGRAM

14.1 PURPOSE

The purpose of the Sandman Inn Redevelopment Project Mitigation Monitoring and Reporting Program (MMRP) is to ensure compliance with all mitigation measures identified in the Initial Study to mitigate or avoid potentially significant adverse environmental impacts resulting from the proposed project. The implementation of this MMRP shall be accomplished by City staff and the project developer's consultants and representatives. The program shall apply to the following phases of the project:

- Plan and specification preparation,
- Preconstruction conference,
- Construction of the site improvements, and
- Post construction.

14.2 RESPONSIBILITIES AND DUTIES

A qualified representative of the developer, approved by the City Planning Division and paid for by the developer, shall be designated as the Project Environmental Coordinator (PEC). The PEC shall be responsible for assuring full compliance with the provisions of this mitigation monitoring and reporting program to the City. The PEC shall have authority over all other monitors/specialists, the contractor, and all construction personnel for those actions that relate to the items listed in this program.

It is the responsibility of the contractor to comply with all mitigation measures listed in the MMRP matrix. Any problems or concerns between monitors and construction personnel shall be addressed by the PEC and the contractor. The contractor shall prepare a construction schedule subject to the review and approval of the PEC. The contractor shall inform the PEC of any major revisions to the construction schedule at least 48 hours in advance. The PEC and contractor shall meet on a weekly basis in order to assess compliance and review future construction activities.

Preconstruction Briefing. The PEC shall prepare a preconstruction project briefing report. The report shall include a list of all mitigation measures and a plot plan delineating all sensitive areas to be avoided. This report shall be provided to all construction personnel.

The preconstruction briefing shall be conducted by the PEC. The briefing shall be attended by the PEC, construction manager, necessary consultants, monitors, Planning Division case planner, building inspector, Public Works representatives, and all contractors and subcontractors associated with the

project. Preconstruction briefings shall be conducted as needed as the work progresses or if a change in contractor occurs.

The MMRP shall be presented to those in attendance. The briefing presentation shall include project background, the purpose of the MMRP, duties and responsibilities of each participant, communication procedures, monitoring criteria, compliance criteria, filling out of reports, and duties and responsibilities of the PEC and project consultants.

It shall be emphasized at this briefing that the PEC and project consultants have the authority to stop construction and redirect construction equipment in order to comply with all mitigation measures.

Once construction commences, field meetings between the PEC and project consultants, and contractors shall be held on an as-needed basis in order to create feasible mitigation measures for unanticipated impacts, assess potential effects, and resolve conflicts.

14.3 IMPLEMENTATION PROCEDURES

There are three types of activities which require monitoring. The first type pertains to the review of the Conditions of Approval and Construction Plans and Specifications. The second type relates to construction activities and the third to ongoing monitoring activities during operation of the project.

Monitoring Procedures. The PEC and required consultant(s) shall monitor all field activities. The authority and responsibilities of the PEC and consultant(s) are described in the previous section.

Reporting Procedures. The following three types of reports shall be prepared:

Schedule. The PEC and contractor shall prepare a monthly construction schedule to be submitted to the City prior to or at the preconstruction briefing.

General Progress Reports. The PEC shall be responsible for preparing written progress reports submitted to the City. These reports would be expected on a weekly basis during demolition, grading, and excavation, and on a monthly basis during all other construction activities. The reports would document field activities and compliance with project mitigation measures, such as dust control and sound reduction during construction.

Final Report. A final report shall be submitted to the Planning Division when all monitoring (other than long-term operational) has been completed and shall include the following:

- a. A brief summary of all monitoring activities.

- b. The date(s) the monitoring occurred.
- c. An identification of any violations and the manner in which they were dealt with.
- d. Any technical reports required, such as noise measurements.
- e. A list of all project mitigation monitors.

MMRP Matrix. Table ~~12~~14.0-1, Sandman Inn Redevelopment Project Mitigation Monitoring and Reporting Program Matrix, describes each mitigation measure, lists responsible parties, the required actions, and the frequency of the actions. The matrix should be used in conjunction with the mitigation measures described in full in the Initial Study and the final EIR.

The MMRP Matrix is intended to be used by all parties involved in monitoring the project mitigation measures, as well as project contractors and others working in the field. The matrix should be used as a compliance checklist to aid in compliance verification and monitoring requirements. A copy of the MMRP matrix shall be kept in the project file as verification that compliance with all mitigation measures has occurred.

This MMRP Matrix is a draft and is not completely filled out. The final MMRP will be prepared once approval of the final EIR and Project Conditions of Approval occurs. Project features, as specified in the EIR, will also be incorporated.

**Table 14.0-1
Sandman Inn Redevelopment Project
Mitigation Monitoring and Reporting Program Matrix**

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Air Quality - Recommended Mitigation Measures							
AQ-1	<p>Dust Mitigation - Site Watering. During site grading and transportation of fill materials, regular water sprinkling shall occur, using reclaimed water whenever the Public Works Director determines that it is reasonably available. Water trucks or sprinkler systems shall be used in the late morning; during clearing, grading, earth moving, or transportation of cut and fill materials; and after work is completed for the day to prevent dust from leaving the project site and to create a crust after each day's activities cease. Reclaimed water shall be used if available. Each day, after construction activities cease, the entire area of disturbed soil shall be sufficiently moistened to create a crust.</p> <p>Throughout construction, water trucks or sprinkler systems shall also be used to keep all areas of vehicle movement damp enough to prevent dust raised from leaving the site. At a minimum, this will include wetting down such areas in the late morning and after work is completed for the day. Frequency of construction site watering shall be increased when wind speeds exceed 15 miles per hour (mph) to reduce PM₁₀ emissions.</p>	Contractor	PEC	Inspect in field to ensure compliance with requirement	During clearing, grading, and excavation	Daily Inspections	Weekly reports

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Air Quality - Recommended Mitigation Measures (continued)							
AQ-2	Dust Mitigation - Speed Limit. An on-site speed limit of 15 miles per hour shall be imposed for operation of construction vehicles on dirt surfaces.	Contractor	PEC	Inspect in field to ensure compliance with requirement	During all construction activities	Daily Inspections	Weekly reports
AQ-3	Dust Mitigation - Gravel Pad/Street Sweepings. Gravel pads shall be installed at all access points prior to beginning construction to prevent tracking of mud onto public roads. Streets adjacent to the project site shall be inspected daily for accumulation of mud, dirt, or silt on streets. Affected road segments shall be cleaned daily.	Contractor	PEC	Ensure installation of gravel pads	Prior to beginning of construction	Prior to construction	Weekly reports
		Contractor	PEC	Inspect in field to ensure compliance with requirement	During all construction activities	Daily during construction	Weekly reports
AQ-4	Dust Mitigation - Stockpile Treatment. All stockpiled soil materials shall be watered regularly as needed to inhibit dust generation. Excavated material and stockpiled soil shall be covered if not being used within the next 48 hours.	Contractor	PEC	Inspect in field to ensure compliance with requirement	During all construction activities	Regularly as Needed	Weekly reports
AQ-5	Dust Mitigation - Grading Suspension. Grading and scraping operations will be suspended when wind speeds exceed 20 mph to reduce PM ₁₀ emissions.	Contractor	PEC	Inspect in field to ensure compliance with requirement	During all construction activities	Regularly as Needed	Weekly reports

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Air Quality - Recommended Mitigation Measures (continued)							
AQ-6	<p>Dust Mitigation - Site Stabilization. Disturbed areas will be permanently stabilized with landscaping ground cover or site improvements as soon as practicable following the completion of earthwork.</p> <p>After clearing, grading, earth moving, or excavation is completed, the entire area of disturbed soil shall be treated to prevent wind pickup of soil. This may be accomplished by</p> <ul style="list-style-type: none"> A. seeding and watering until grass cover is grown; B. spreading soil binders; C. sufficiently wetting the area down to form a crust on the surface with repeated soakings as necessary to maintain the crust and prevent dust pickup by the wind; D. other methods approved in advance by the Air Pollution Control District. <p>All roadways, driveways, sidewalks, etc., shall be paved as soon as possible. Additionally, building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</p>	Contractor	PEC	Inspect in field to ensure compliance with requirement	Following completion of earthwork	As needed during construction	Weekly reports
AQ-7	<p>Dust Mitigation - Truck Covering. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code (CVC) section 23114 ("freeboard" means vertical space between the top of the load and top of the trailer).</p>	Contractor	PEC	Inspect in field to ensure compliance with requirement	During all construction activities	Daily Inspections	Weekly reporting

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Air Quality - Recommended Mitigation Measures (continued)							
AQ-8	Dust Mitigation - Monitor. The contractor shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the City and SBCAPCD prior to permit clearance for grading.	Contractor	City Staff	Monitor information to be included on construction grading and building plan specifications Inspect in field to ensure compliance with requirement	During all construction activities	At plan check	NA
AQ-9	Dust Mitigation - Plan Specifications. Prior to grading permit clearance, the applicant shall include all dust control requirements as notes on construction grading and building plans.	Applicant	City Staff	Notes to be included on construction plans	Prior to issuance of grading permit	At plan check	NA
AQ-10	Diesel Vehicle Emissions Control. Operators of diesel-powered vehicles should turn off the engine after 5 minutes when the vehicle is not in motion, keep the vehicles well-tuned and maintained, and retrofit engines with pollution-control devices. Consideration should be given to purchasing trucks and buses that meet new US EPA standards ahead of schedule. Vehicle owners should use ultra-low-sulfur fuel in combination with pollution control equipment such as particulate matter filters.	Contractor	PEC	Inspect in field to ensure compliance with requirement	During all construction activities	Daily Inspections	Weekly reporting

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Air Quality - Recommended Mitigation Measures (continued)							
AQ-11	<p>Construction Equipment Emissions. As of June 15, 2008, fleet owners are subject to sections 2449, 2449.1, 2449.2, and 2449.3 in Title 13, Article 4.8, Chapter 9, of the California Code of Regulations (CCR) to reduce diesel particulate matter and criteria pollutant emissions from in-use off-road diesel-fueled vehicles. The following shall be adhered to during project grading and construction to reduce NO_x and PM_{2.5} emissions from construction equipment:</p> <ul style="list-style-type: none"> • All portable construction equipment shall be registered with the state’s portable equipment registration program OR permitted by the district by September 18, 2008. • Diesel construction equipment meeting the California Air Resources Board’s Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting Tier 2 or higher emission standards should be used to the maximum extent feasible. • The engine size of construction equipment shall be the minimum practical size. • The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • Construction equipment shall be maintained in tune per the manufacturer’s specifications. 	Contractor	PEC	Inspect in field to ensure compliance with requirement	During all construction activities	Daily inspections	Weekly reporting

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Air Quality - Recommended Mitigation Measures (continued)							
AQ-11 (continued)	<ul style="list-style-type: none"> Construction equipment operating on site shall be equipped with two- to four-degree engine timing retard or pre-combustion chamber engines. Catalytic converters shall be installed on gasoline-powered equipment, if feasible. Diesel catalytic converters, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by US EPA or California shall be installed on equipment operating on site. Diesel powered equipment should be replaced by electric equipment whenever feasible. Idling of heavy-duty diesel trucks during loading and unloading shall be limited to five minutes; auxiliary power units should be used whenever possible. 						

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Air Quality - Recommended Mitigation Measures (continued)							
AQ-12	Construction Equipment Operations. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number of equipment is operating at any one time. The construction contractor shall ensure that work crews shut off equipment when not in use. In addition, California’s more recent anti-idling regulations (with some exemptions) require that drivers of diesel-fueled commercial vehicles weighing more than 10,000 pounds (1) shall not idle the vehicle’s primary diesel engine for greater than 5 minutes at any location, and (2) shall not use diesel-fueled auxiliary power units for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle equipped with a sleeper berth, at any location.	Contractor	PEC	Inspect in field to ensure compliance with requirement	During all construction activities	Daily inspections	Weekly reporting
AQ-13	Architectural Coating Emissions. Compliance with the SBCAPCD Rules and Regulations on the use of architectural coatings shall be implemented as applicable, including using pre-coated/natural-colored building materials, using water-based or low-ROC coating, and using coating transfer or spray equipment with high transfer efficiency.	Contractor	PEC	Inspect in field to ensure compliance with requirement.	During Construction	Daily inspections when coatings are being applied	Weekly reporting
<u>AQ-14:</u>	<u>Asbestos.</u> <u>The project applicant shall complete and submit a SBAPCD Asbestos Demolition and Renovation Compliance Checklist at least 10 days prior to the commencement of any demolition activities.</u>	<u>Applicant</u>	<u>PEC</u>	<u>Verify submission</u>	<u>Prior to demolition</u>	<u>NA</u>	<u>NA</u>

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Air Quality - Recommended Mitigation Measures (continued)							
<u>AQ-15</u>	<u>Construction Worker Trips.</u> Construction worker trips should be minimized by requiring carpooling and by providing for lunch on site.	Applicant	PEC	Inspect in field to ensure compliance with requirement	During all construction activities	Daily inspections	Weekly reporting
Biological Resources – Recommended Mitigation Measures							
BIO-1	Seasonal Restriction. Removal of trees during initial site development should be limited to the time period between September 1 and January 31. If tree removal or construction is to occur during the bird nesting season (February 1 through August 31), a City-approved biologist shall conduct a survey at the site for active nests two weeks prior to any scheduled tree removal, tree pruning, development, or grading. If active nests are located, setbacks for construction work would be required until the nest is no longer active or the young have fledged. If no active nests are found, the construction, tree removal, or grading restrictions specified in this section shall not apply.	Applicant	City-approved biologist	Prepare preconstruction surveys if vegetation must occur during nesting season and establish buffers if necessary.	Prior to removal of vegetation	Regular (daily) inspections during breeding/ nesting season	Weekly reports during breeding/ nesting season

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Cultural Resources – Recommended Mitigation Measures							
CR-1	Unanticipated Archaeological Resources Contractor Notification. Prior to the start of any vegetation or paving removal, demolition, trenching or grading, contractors and construction personnel shall be alerted to the possibility of uncovering unanticipated subsurface archaeological features or artifacts associated with past human occupation of the parcel. If such archaeological resources are encountered or suspected, work shall be halted immediately, the City Environmental Analyst shall be notified, and an archaeologist from the most current City Qualified Archaeologists List shall be retained by the applicant. The latter shall be	Applicant	PEC	Alert contractors and construction personnel of potential to uncover subsurface archaeological features	Prior to the start of any vegetation or paving removal, demolition, trenching, or grading	During preconstruction conference and during construction	PEC Reports

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Cultural Resources – Recommended Mitigation Measures (continued)							
CR-1 (continued)	<p>employed to assess the nature, extent, and significance of any discoveries and to develop appropriate management recommendations for archaeological resource treatment, which may include, but are not limited to, redirection of grading and/or excavation activities, consultation and/or monitoring with a Barbareño Chumash representative from the most current City-qualified Barbareño Chumash Site Monitors List, etc.</p> <p>If the discovery consists of possible human remains, the Santa Barbara County Coroner shall be contacted immediately. If the coroner determines that the remains are Native American, the coroner shall contact the California Native American Heritage Commission. A Barbareño Chumash representative from the most current City-qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.</p> <p>If the discovery consists of possible prehistoric or Native American artifacts or materials, a Barbareño Chumash representative from the most current City-qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.</p>						

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Geophysical Conditions– Required Mitigation Measures							
G-1	Geotechnical Recommendations. Site preparation and project construction related to soil conditions and seismic hazards shall be in accordance with the recommendations contained in the Soils Engineering Report, prepared by Earth Systems Pacific, dated September 25, 2003. Compliance shall be demonstrated on plans submitted for grading and building permits.	Applicant and Qualified Geotechnical Engineer	City Building and Safety Department	Review Final Geotechnical Reports	Prior to the issuance of grading permits	Prior to plan check for grading permit	NA
Noise – Required Mitigation Measures							
N-1 [only applicable to proposed project]	Sound Barrier. As part of the building plan submittal, either of the following shall be included to reduce noise levels to the easternmost residence adjacent to the parking garage driveway: a. The easternmost residence along State Street shall include a solid wall on its eastern side to act as a noise barrier between the driveway and interior living area of that unit; or b. The driveway slope shall not exceed 10 percent for at least one car length at the top of the ramp where cars may be waiting to exit to State Street; do not allow windows to directly face the driveway at this location on the first floor; and use dual-glazed window panes on any second-story windows that overlook the driveway.	Applicant	Community Development Department	Review Landscape Plan	Prior to issuance of building permits	Prior to plan check	After review of plan

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Noise – Required Mitigation Measures (continued)							
N-2 [only applicable to proposed project]	<p>Interior Noise Reduction:</p> <p>a. The walls, doors, and windows of units that face State Street shall be constructed to include sufficient noise attenuation to reduce interior levels to a CNEL of 45 dB(A). This would require, at a minimum, the use of double-paned windows on all floors for those windows that face State Street.</p> <p>b. Windows shall have a minimum Standard Transmission Class (STC) of 35 and be properly installed, weather-stripped, and insulated.</p> <p>c. Doors with a minimum STC of 35 shall be used for doorways facing State Street and shall be insulated in conformance with California Title 24 requirements.</p> <p>d. The exterior wall facing shall be stucco and/or shall be designed for a minimum STC of 45.</p> <p>e. Roof or attic vents facing State Street shall be baffled.</p> <p>f. Air conditioning or a mechanical ventilation system shall be installed in at least the five dwelling units fronting on State Street, as well as the two others outside the 60-dB noise corridor so that windows and doors may remain closed. Ventilation systems shall be installed and operable prior to Certificate of Occupancy.</p>	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Noise – Required Mitigation Measures (continued)							
N-3	Exterior Residential Areas. Usable residential exterior areas (patios, balconies, courtyards) shall be oriented away from State Street to the extent feasible, and preferably shielded from roadways by the structures themselves.	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans
N-4	Pavement. The residential parking lot driveway shall be paved with a coating to reduce tire squeal. This coating would consist of granulate rubber made from used tires as its aggregate and urethane resin as its binder.	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans
N-5	Left Turns. Prohibit left turns onto State Street from the residential parking lot to eliminate sudden car accelerations that could otherwise occur when making this turn.	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans
N-6	Construction Notice. At least 30 days prior to commencement of construction, the contractor shall provide written notice to all property owners and building occupants within 450 feet of the project area that proposed construction activities could substantially affect outdoor or indoor living areas. The notice shall contain a description of the proposed project, a construction schedule including days and hours of construction, a description of noise-reduction measures, and the name and phone number of the Project Environmental Coordinator (PEC) who can answer questions and provide additional information or address problems that may arise associated with construction noise.	Contractor	PEC	In field observation to verify	Prior to and during construction	Daily during all construction activities	PEC Reports

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Noise – Required Mitigation Measures (continued)							
N-6 (continued)	A 24-hour construction hot line shall be provided. Any noise complaints received shall be documented, and, as appropriate, construction activities shall be modified to the extent feasible to address such complaints. Informational signs with the PEC's name and telephone number shall also be posted at the site and shall be easily viewed from adjacent public areas.						
N-7	Construction Hours. Noise-generating construction activities (which may include preparation for construction work) shall be permitted weekdays between the hours of 8:00 AM and 5:00 PM, excluding holidays observed by the City as legal holidays: New Year's Day (January 1); Martin Luther King Jr.'s Birthday (3rd Monday in January); President's Day (3rd Monday in February); Memorial Day (Last Monday in May); Independence Day (July 4); Labor Day (1 st Monday in September); Thanksgiving Day (4 th Thursday in November); Day Following Thanksgiving Day (Friday following Thanksgiving); Christmas Day (December 25). When a holiday falls on a Saturday or Sunday, the preceding Friday or following Monday respectively shall be observed as a legal holiday. Occasional night work may be approved for the hours between 5:00 PM and 8:00 AM weekdays by the Chief of Building and Zoning (per Section 9.13.015 of the Municipal Code). In the event of such night work approval, the applicant shall provide written notice to all property owners and occupants within 450 feet of the	Contractor	PEC	In field observation to verify construction hours as 8:00 AM–5:00 PM Monday–Friday and no construction activities on weekends and legal holidays	Prior to and during construction	Daily during all construction activities	PEC Reports

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Noise – Required Mitigation Measures (continued)							
N-7 (continued)	project property boundary and the City Planning and Building Divisions at least 48 hours prior to commencement of night work. Night work shall not be permitted on weekends or holidays.						
N-8	Construction Equipment Sound Barrier. Stationary construction equipment that generates noise that exceeds 50 dB(A) at the property boundaries shall be shielded with a barrier that meets a (STC) rating of 25.	Contractor	PEC	In field observation to verify	Prior to issuance of a demolition, grading, or building permit for any construction phase	Daily, or otherwise as necessary during construction	PEC Reports
N-9	Construction Equipment Sound Control. All construction equipment powered by internal combustion engines shall be properly muffled and maintained. No internal combustion engine shall be operated on the site without a muffler. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers. Unnecessary idling of internal combustion engines shall be prohibited.	Contractor	PEC	Verify use of equipment with best available noise control technology	Prior to issuance of a demolition, grading, or building permit for any construction phase	Daily, or otherwise as necessary during construction	PEC Reports
N-10	Construction Noise Barrier. Air compressors and generators used for construction shall be surrounded by temporary acoustical shelters. Whenever feasible, electrical power shall be used to run air compressors and similar power tools.	Contractor	PEC	In field observation to verify	Prior to issuance of a demolition, grading, or building permit for any construction phase	Daily, or otherwise as necessary during construction	PEC Reports
N-11	Window Replacement. The applicant shall offer to have a minimum 4-millimeter-thick, double-paned glass installed in the first- and second-story windows of the residences that face the project site.	Applicant	Community Development Department staff	Written notice of the residences that face the project site	Prior to construction activities	NA	NA

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Noise – Required Mitigation Measures (continued)							
N-12	Air Conditioning. The applicant shall offer to install temporary air conditioning in those residential units adjacent to the project site that do not already have this feature to allow residents to keep their windows closed during construction activities.	Applicant	Community Development Department staff	Written notice of the residences that face the project site.	Prior to construction activities	NA	NA
N-13	Construction Sound Barrier Wall. Install a temporary construction sound barrier wall along the northern half of the western edge of the project site, the entire northern end of the site, and the northern half of the eastern edge of the project site. The barrier should be made of sound-attenuating material (not landscaping). The noise barrier can be constructed from concrete, masonry, wood, metal, or other materials determined to be appropriate by the City. To effectively reduce sound transmission through the barrier, the material chosen must be rigid and sufficiently dense (at least 20 kilograms/square meter). All noise barrier material types are equally effective, acoustically, if they have this density. The barrier shall be of sufficient height to block direct line of sight to the first story of adjacent residential uses. It is estimated that a noise barrier of the prescribed density would reduce average noise levels to sensitive receptors by up to 5 dB if the barrier blocks direct line of sight, and an additional 1.5 dB for each meter of barrier height for those uses blocked from direct line of sight.	Contractor	PEC	In field observation to verify	During construction (all phases)	Daily, or otherwise as necessary during construction	NA

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Noise – Required Mitigation Measures (continued)							
N-14 [only applicable to applicant’s alternative]	<p>Interior Noise Reduction for Residential Units adjacent to State Street:</p> <p>a. The walls, doors, and windows of residential units closest to State Street shall be constructed to include sufficient noise attenuation to reduce interior levels to a CNEL of 45 dB(A).</p> <p>b. Windows shall have a minimum Standard Transmission Class (STC) of 35 and be properly installed, weather-stripped, and insulated.</p> <p>c. Doors with a minimum STC of 35 shall be used for doorways facing State Street and shall be insulated in conformance with California Title 24 requirements.</p> <p>d. Roof or attic vents facing State Street shall be baffled.</p> <p>e. Air conditioning or a mechanical ventilation system shall be installed in the two dwelling units outside the 60 dB noise corridor so that windows and doors may remain closed. Ventilation systems shall be installed and operable prior to Certificate of Occupancy.</p>	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans
N-15 [only applicable to applicant’s alternative]	<p>Interior Noise Reduction for Office Units Adjacent to State Street:</p> <p>The walls, doors, and windows of office units adjacent to State Street shall be constructed to include sufficient noise attenuation to reduce interior levels to a CNEL of 50 dB(A).</p>	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Public Services – Required Mitigation Measures							
PS-1 [only applicable to proposed project]	Operational Recycling. Hotel and restaurant operators shall encourage guests to recycle by using recyclable materials and providing sufficient and appropriate receptacles, such as recycling or green waste containers, in each room. Recyclable material collection and pick-up areas shall be provided on site for the hotel and restaurant operations. The hotel and restaurant operators shall use materials that are recyclable to the extent feasible.	Hotel and restaurant operator	City Environmental Program Supervisor	Review recycling plans	Prior to issuance of occupancy permits	Annually	Annually
PS-2	Trash Enclosure Provision and Design. A trash enclosure with adequate area for recycling containers shall be provided on each property and screened from view from surrounding properties and the street. Dumpsters and containers with a capacity of 1.5 cubic yards or more shall not be placed within 5 feet of combustible walls, openings, or roofs unless protected with fire sprinklers. Project trash container areas shall incorporate approved long-term structural storm water best management practices (BMPs) to protect water quality. The applicant shall submit project plans to the satisfaction of Public Works Engineering and Solid Waste Department that incorporate long-term structural BMPs for trash storage areas to protect storm water quality. The owners shall maintain these structural storm water quality protections in working order for the life of the project, and shall inspect them at least annually and report to the City annually.	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Public Services – Required Mitigation Measures (continued)							
PS-3	<p>Waste Management Plan. The applicant shall develop and implement a solid waste management plan to reduce waste generated by construction and demolition activities. Consistent with City of Santa Barbara ordinances, and in order to achieve the waste diversion goals required by state law, the contractor may choose to separate waste and recyclables on site or use a combination of source separation and a construction and demolition (C&D) sorting facility. The solid waste management plan shall include the following:</p> <ol style="list-style-type: none"> 1. Contact information: The name and contact information of who will be responsible for implementing the solid waste management plan. 2. Waste assessment: A brief description of the proposed project wastes to be generated, including types and estimated quantities during the construction phase of this project. A minimum of 90 percent of demolition and construction materials shall be recycled or reused. 3. Recycling and waste collection areas: Waste sorting and/or collection and/or recycling areas shall be clearly indicated on the project plans and approved by the City Solid Waste Specialist. 	Applicant	City Environmental Program Supervisor	Review Waste Management Plan	Prior to the start of construction activities	Annually	Annually

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Public Services – Required Mitigation Measures (continued)							
PS-3 (continued)	4. Transportation: A description of the means of transportation of recyclable materials and waste (whether materials will be site-separated and self-hauled to designated centers, or whether mixed materials will be collected by a waste hauler and removed from the site to be processed) and destination of materials.						
	5. Landfill information: The name of the landfill(s) where trash will be disposed of and a projected amount of material that will be landfilled.						
	6. Meetings: A description of meetings to be held between applicant and contractor to ensure compliance with the site solid waste management plan.						
	7. Alternatives to landfilling: A list of each material proposed to be salvaged, reused, or recycled during the course of the project.						
	8. Contingency Plan: An alternate location to recycle and/or stockpile C&D in the event of local recycling facilities becoming unable to accept material (for example: all local recycling facilities reaching the maximum tons per day due to a time period of unusually large volume).						
	9. Implementation and documentation of solid waste management plan:						
	a. Manager: The permit applicant or contractor shall designate an						

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Public Services – Required Mitigation Measures (continued)							
PS-3 (continued)	<p>on-site party (or parties) responsible for instructing workers and overseeing and documenting results of the solid waste management plan for the project site foreman. The contact will notify the Public Works Department immediately should any deviance from the solid waste management plan be necessary.</p> <p>b. Distribution: The contractor shall distribute copies of the solid waste management Plan to the job site foremen, impacted subcontractors, and the architect.</p> <p>c. Instruction: The permit applicant or contractor shall provide on-site instruction of appropriate separation, handling, and recycling, salvage, reuse, and return methods to be used by all parties at the appropriate stages of project development.</p> <p>d. Separation and/or collection areas: The permit applicant or contractor shall ensure that the approved recycling and waste collection areas are designated on site.</p>						

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Public Services – Required Mitigation Measures (continued)							
PS-3 (continued)	<p>e. Construction of recycling and waste container facilities: Inspection shall be made by Public Works to ensure the appropriate storage facilities are created in accordance with AB 2176, California State Public Resources Code 42911 and City of Santa Barbara Zoning Ordinances.</p> <p>f. Hazardous wastes: Hazardous wastes shall be separated, stored, and disposed of according to federal, state, and local regulations.</p> <p>g. Documentation: The contractor shall submit evidence at each inspection to show that recycling and/or reuse goals are being met and a summary of waste generated by the project shall be submitted on a monthly basis. Failure to submit this information shall be grounds for a stop work order. The summary shall be submitted on a form acceptable to the Public Works Department and shall contain the following information:</p> <ul style="list-style-type: none"> Disposal information: amount (in tons or cubic yards) of material landfilled; identity of the landfill; total amount of tipping fees paid at the landfill; weight tickets, manifests, receipts, and invoices (attach copies). 						

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Public Services – Required Mitigation Measures (continued)							
PS-3 (continued)	<ul style="list-style-type: none"> • Recycling information: amount and type of material (in tons or cubic yards); receiving party; manifests, weight tickets, receipts, and invoices (attach copies). • Reuse and salvage information: list of items salvaged for reuse on project or campus (if any); amount (in tons or cubic yards); receiving party or storage location. <p>h. Contingency Plan: The permit applicant or contractor shall detail the location and recycling of stockpiled material in the event of the implementation of a contingency plan.</p>						

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Transportation and Circulation - Required Mitigation Measures							
T-1	Final plans submitted to the Architectural Board of Review for review and approval prior to issuance of a building permit shall show the existing vegetation and fencing adjacent to the proposed new Town & Country Apartment driveway being trimmed and/or removed to provide adequate sight lines along San Remo Drive in accordance with City code (SBMC §28.90.001.K). <u>This shall apply to all landscaping and fencing on the 3715 San Remo Drive property. The owner of 3715 San Remo Drive shall request the neighboring property owner to the east to trim or remove vegetation and fencing on that property sufficient to provide adequate sight lines from the proposed new driveway, to be paid for by the owner of 3715 San Remo Drive.</u>	Applicant	PEC	Inspect in field to ensure compliance with requirement	Prior to issuance of occupancy permits	Annually	Annually

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Transportation and Circulation - Required Mitigation Measures (continued)							
T-2	Existing on-street parking adjacent to the proposed Town & Country Apartment driveway will need to be removed to allow for adequate sight lines along San Remo Drive. This will result in the loss of at least one on-street parking space along the south curb. This will include the curbfront between the proposed driveway and the remaining 3715 San Remo driveway to the west. Parking should be restricted along the south curb on San Remo Drive within 5 feet of the east side of the driveway to provide adequate sight lines along the street for exiting vehicles. This information shall be shown on final plans submitted to the Architectural Board of Review for review and approval prior to issuance of a building permit.	Applicant	PEC	Inspect in field to ensure compliance with requirement	Prior to issuance of occupancy permits	NA	NA
T-3 [only applicable to proposed project]	The residential parking garage shall be redesigned to eliminate the movement conflicts at the base of the garage access ramp to acceptable City standards. Access to private garages and surface parking spaces should be kept back from the ramp to provide clear space for vehicles using the garage ramp. This includes addressing spaces for units 1-4 as shown in Figure 7.0-12 of the EIR and eliminating the need for vehicles to stop on the sloped portion of the ramp. The revised parking design shall be reviewed and approved by the City's Transportation Division, and shall be included in the final plans presented to the Architectural Board of Review prior to final approval.	Applicant	Community Development Department/ Transportation Division	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Traffic - Recommended Mitigation Measures							
T-4	The proposed left-turn access from eastbound State Street should not be included as part of the proposed project in order to reduce the potential conflicts with opposing traffic on State Street, reduce the potential for queuing left-turn vehicles to block through traffic and reduce potential impacts on pedestrians and bicyclists.	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans
T-5	The raised median in front of the site on State Street should be extended to the east, or other similar treatment, to restrict left-turns into the site. The applicant should work with City staff to determine what modifications to the existing raised median would be required to adequately accommodate the extended median. No U-Turn signage will need to be provided at the new eastern end of the raised median. The revised median design shall be reviewed and approved by the City's Transportation Division and the City Engineer.	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans
T-6	If the residential left-turn lane is allowed, the median and turn lane should be designed to accommodate No U-Turn signage, to physically restrict the ability for vehicles to turn left out of the residential driveway, and to discourage drivers from attempting U-turns at the median opening. The revised median design shall be reviewed and approved by the City's Transportation Division and the City Engineer.	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Traffic - Recommended Mitigation Measures (continued)							
T-7	Internal garage conflicts at the drive aisle junctions should be addressed to provide better sight lines between vehicles. Options include cutting back corners of some garages (locations 8 and 9 as identified in EIR Figure 7.0-12 for the proposed project, or locations 3 and 4 on EIR Figure 7.0-13 for the applicant's alternative) to improve sight lines within the garage. Circulation problems that were identified in the analysis as problematic will need to be modified or the parking spaces relocated to address congestion/conflicts in the garage.	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans
T-8 [only applicable to applicant's alternative]	Commercial parking spaces located in the residential parking garage should be assigned to specific users to ensure greater use of the spaces. A preferred option is to relocate these spaces to the surface spaces along the access driveway to the office buildings.	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans
T-9 [only applicable to applicant's alternative]	Spaces located along the office access driveway that are included in the total number of spaces required to meet the parking code requirement for the office use, should be marked as "for office use only" during business hours.	Applicant	Community Development Department	Review Project Plans	Prior to issuance of building permits	Prior to plan check	After review of plans

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Traffic - Recommended Mitigation Measures (continued)							
T-10	To reduce trips associated with export of site debris, prior to issuance of grading and/or demolition permits, the applicant shall develop and implement a solid waste management plan for review and approval by the City to reduce waste generated by construction and demolition activities. In addition, the applicant shall work with other development projects in the area to minimize the distance that export material is hauled from the site and manage the hours during which that hauling occurs to minimize the effects on area traffic.	Applicant	Community Development Department/PE C	Review Plan	During demolition, grading and construction	Daily	Daily
T-11	<p>Prior to issuance of building permits, the applicant shall prepare a construction management plan for review and approval by City staff. Prior to beginning the next phase of construction, review the plan with City Engineering staff and modify as needed to ensure coordination with other area construction projects to minimize any lane closures or traffic intensive activities.</p> <ul style="list-style-type: none"> The construction management plan shall provide for: No hauling of bulk materials and waste shall occur during peak traffic hours. Hauling of materials shall be limited along streets that have fronting residential land uses or near school sites. Flagmen shall be provided at the project's truck entrance to expedite movements into and out of the site. 	Applicant	Community Development Department/PEC	Review Plan	During demolition, grading and construction	Daily	Daily

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Traffic - Recommended Mitigation Measures (continued)							
T-11 (continued)	<ul style="list-style-type: none"> Access of all but essential construction traffic on San Remo Drive shall be limited. Any lane closures required along State Street for construction should be done during off-peak hours and all lanes should be open for travel during the peak commute hours and on weekends. 						
T-12	<p>Prior to issuance of building permits, the applicant shall prepare a management plan for review and approval by City staff for employee parking to eliminate intrusion into area on-street parking spaces and maximize the use of available on-site parking.</p> <p>Construction parking and storage shall be provided as follows:</p> <ul style="list-style-type: none"> During construction, free parking spaces for construction workers and construction shall be provided on-site or off-site in a location subject to the approval of the Public Works Director. Construction workers are prohibited from parking within the public right-of-way, except as outlined below. Parking in the public right of way is permitted as posted by Municipal Code, as reasonably allowed for in the 2006 Greenbook (or latest reference), and with a Public Works permit in restricted parking zones. No more than three (3) individual parking permits without extensions may be issued for the life of the project. 	Applicant	Community Development Department/ PEC	Review Plan	During demolition, grading and construction	Daily	Daily

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Traffic - Recommended Mitigation Measures (continued)							
T-12 (continued)	<ul style="list-style-type: none"> Storage or staging of construction materials and equipment within the public right-of-way shall not be permitted, unless approved by the Transportation Manager. 						
Visual Aesthetics – Required Mitigation Measures							
VA-1	Prior to removal of any trees, and prior to final design review, a landscape plan accommodating the relocation of existing mature palm trees, particularly those considered “skyline trees” (tall [55 to 65 foot] Mexican Fan palms [Washingtonia robusta]) to the maximum extent <u>reasonably</u> feasible shall be submitted to the City arborist for review and approval. This plan shall include planter design specifications to ensure the long-term growth and survival of the relocated trees.	Applicant	City Staff	Review and approve landscape plan	Prior to issuance of tree removal permit	NA	NA
VA-2	Prior to removal of any trees, the applicant shall revise the landscape plan to include one replacement specimen tree for each major <u>mature</u> tree (as determined by the City arborist) removed.	Applicant	City Staff	Review and approve landscape plan	Prior to issuance of tree removal permit	NA	NA

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Water Environment – Required Mitigation Measures							
W-1	<p>Construction Erosion/Sedimentation Control Plan. Project grading and construction shall be conducted in accordance with an approved erosion control plan to protect water quality throughout the duration of site preparation, earthwork, and construction process. Prior to the issuance of a demolition or building permit for the proposed project, the applicant or project developer shall prepare an erosion control plan that is consistent with the requirements outlined in the Procedures for the Control of Runoff into Storm Drains and Watercourses and the Building and Safety Division Erosion/Sedimentation Control Policy (2003). The erosion control/water quality protection plan shall specify how the required water quality protection procedures are to be designed, implemented, and maintained over the duration of the development project. A copy of the plan shall be submitted to the Community Development and Public Works Departments for review and approval, and a copy of the approved plan shall be kept at the project site.</p>	Contractor	Public Works Director	Review Project Storm Water Management Plan	Issuance of any grading permit	Prior to plan check	Subsequent to review of Storm Water Management Plan

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Water Environment – Required Mitigation Measures (continued)							
W-1 (continued)	At a minimum, the erosion control/water quality protection plan prepared for the proposed project shall address the implementation, installation, and/or maintenance of each of the following water resource protection strategies: paving and grinding, sandbag barriers, spill prevention/control, solid waste management, storm drain inlet protection, stabilize site entrances and exits, illicit connections and illegal discharges, water conservation, stockpile management, liquid wastes, street sweeping and vacuuming, concrete waste management, sanitary/septic waste management, vehicle and equipment maintenance, vehicle and equipment cleaning, and vehicle and equipment fueling.						
W-2	Minimization of Storm Water Pollutants of Concern. The applicant shall implement approved plans incorporating long-term storm water best management practices (BMPs) to minimize identified storm water pollutants of concern including automobile oil, grease and metals. The applicant shall submit project plans incorporating long-term BMPs to minimize storm water pollutants of concern to the extent feasible, and obtain approval from Public Works Engineering. The owners association shall maintain approved facilities in working order for the life of the project, and shall inspect annually and submit report to City annually.	Applicant	PEC	Compliance inspections to ensure compliance with requirement	During project operation	Periodic inspections as determined applicable	Annually

Mitigation Measure ¹	Mitigation Requirements	Responsible Entity	Monitor	Action by Monitor	Mitigation Frequency	Monitoring Frequency	Reporting Frequency
Water Environment – Required Mitigation Measures (continued)							
W-3	Storm Drain System Stenciling and Signage. Within the project area, the applicant shall implement stenciling of all storm drain inlets and catch basins, and posting of signs at all public access points along channels and creeks, with language in English and Spanish and graphic icons prohibiting dumping, per approved plans. The applicant shall submit project plans to the satisfaction of Public Works Engineering that identify storm drain inlet locations throughout the project area, and specified wording and design treatment for stenciling of storm drain inlets and signage for public access points that prohibit dumping. The owners association shall maintain ongoing legibility of the stenciling and signage for the life of the project, and shall inspect at least annually and submit report annually.	Applicant	Public Works Director	In field observation to verify	Prior to issuance of occupancy permits	NA	NA

¹ Unless otherwise noted, all mitigation measures apply to both the proposed project and the applicant’s alternative.
 PEC=Project environmental coordinator.

15.0 ORGANIZATIONS AND PERSONS CONSULTED

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Allison De Busk, Project Planner

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Rob Dayton, Managing Transportation Planner

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15.2 APPLICANT

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