

S A N T A B A R B A R A F O R A L L



May 5, 2010

Honorable Planning Commission
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93101

SUBJECT: Further Comments on the General Plan Update & Draft EIR

Honorable Commissioners:

Please allow us this opportunity to comment further on the GPU and DEIR after observing the comments of the staff, public, and Commissioners. We want to briefly reiterate our most significant recommendations for further action by the Commission.

In general, we stress our agreement that policies, mitigation implementations and alternatives operate together but that the “graphic equalizer” analogy (put forth by Commissioner Jostes at the last hearing) isn’t exactly accurate, because many of the “dials and levers” are linked, one to another. Most importantly, the TDM element will only really work when it is linked to the Additional Housing scenario. As we quoted in our previous statement:

“... this alternative would direct additional residential in-fill development and densities in the downtown and along commercial corridors, to provide more affordable housing that supports the local economy and diverse population; improve the jobs/housing balance, and reduce long-distance commuting and its associated air pollution, energy use, and regional traffic; and to provide stronger traffic management and vehicle trip reductions strategies, such as greater support of local and regional rail and bus transit, vehicle sharing, telecommuting, and parking management”.

According the EIR analysis, the Additional Housing Alternative is the ONLY scenario that allows for ALL of the projects’ objectives to be met, and is the one we *strongly recommend*. It should also be noted that the 4300 residential units associated with this Alternative represents less than a 1% growth rate, which has been Santa Barbara’s historical growth rate. *This is a housing production, NOT a high growth alternative.*

Specifically we urge you to:

- Include policies LG 4; LG 5.1; LG 6; and LG 9 from the Land Use Element into the Housing Element
- Recommend adoption of the (revised) Housing Element

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- Delete the Residential Average Density Program from the General Plan and EIR and include them as an implementation item along with the development of a Form Based Code. Further analysis of the unit sizes, FARs and residential densities is needed.
- Increase the “bonus density” for rentals to 100% of base, and legalize “legal non-conforming” rental property to allow refurbishing.
- Adoption of the Transit Demand Management plans and policies, as linked in the DEIR to the Additional Housing Alternative.
- Do not enact a moratorium for residential development within 500 feet of the freeway. Look to other ways to mitigate Air Quality impacts such as reduced traffic and closed air circulation systems in units. Replace currently proposed Policy ER 7 – Air Quality with previously proposed ER 12 – Air Quality.

There are many issues that require further community discussion and analysis in order to arrive at a true consensus. We recommend that the other elements be subject to a further ongoing process – not as extensive (or costly) as the previous Plan SB process, but one which allows staff and public development and evaluation of steps like:

- Form-based coding
- FAR and density standards for different areas of the City
- Redrawing of “Downtown Business District” lines, to include the Milpas corridor, et al
- Clearer definitions of “community character”, views, and compatibility with historic resources
- Economic effects of implemented policies

Although Plan SB has been many years in the making, we believe that it needs further work to accurately reflect majority public opinion and to effectively plan for the next 20 years.

Thank you for this further opportunity to comment.

Sincerely,



PF Mickey Flacks
Co-Chair

PF Alex Pujo
Co-Chair

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