City of Santa Barbara

Final Environmental Impact Report

Entrada de Santa Barbara
22-120 State Street and
15 East Mason Street

June 2001

City of Santa Barbara
630 Garden Street, P.O. Box 1990
Santa Barbara, CA 93102-1990

Prepared by

Science Applications International Corporation
An Employee-Owned Company
816 State Street, Suite 500, Santa Barbara, CA 93101

City of Santa Barbara

Final Environmental Impact Report

Entrada de Santa Barbara
22-120 State Street and
15 East Mason Street

June 2001

City of Santa Barbara
630 Garden Street, P.O. Box 1990
Santa Barbara, CA 93102-1990

Prepared by
Science Applications International Corporation
An Employee-Owned Company
816 State Street, Suite 500, Santa Barbara, CA 93101

TABLE OF CONTENTS

EXECUTIVE SUMMARY ES-1

1.0 INTRODUCTION 1-1
- 1.1 Purpose 1-1
- 1.2 Scope 1-1
- 1.3 Environmental Review Process 1-2
- 1.4 EIR Adequacy 1-4
- 1.5 Intended Use of the EIR 1-4
- 1.6 Required Approvals by the City of Santa Barbara 1-5
- 1.7 Other Agency Review and Approvals 1-5
- 1.8 Project Sponsors/Contact Persons 1-6
- 1.9 Document Organization 1-7

2.0 PROJECT DESCRIPTION/HISTORY 2-1
- 2.1 Project Summary 2-1
- 2.2 Project Location and Land Use Designations 2-1
- 2.3 Project Components 2-4
- 2.4 Project History 2-16

3.0 LAND USE AND POLICY CONSIDERATIONS 3-1
- 3.1 Introduction 3-1
- 3.2 California Coastal Act 3-1
- 3.3 Local Coastal Plan 3-2
- 3.4 General Plan 3-5
- 3.5 Downtown/Waterfront Santa Barbara, *A Tradition in Progress*, Final Report and Recommendations 3-7

4.0 PUBLIC VIEW ANALYSIS 4-1
- 4.1 Existing Setting 4-1
- 4.2 Existing Public View Plans and Policies 4-17
- 4.3 Analytic Methodology 4-18
- 4.4 Project Setting and Impact Analysis 4-20
- 4.5 Summary of Project Impacts on Public Views 4-113
- 4.6 Cumulative Impacts 4-116

5.0 PROJECT ALTERNATIVES 5-1
- 5.1 Alternative 1: No Project 5-1
- 5.2 Environmentally Superior Alternative 5-1

6.0 IMPACTS NOT FOUND TO BE SIGNIFICANT 6-1

7.0 OTHER CEQA SECTIONS 7-1
- 7.1 Growth Inducing Impacts 7-1
- 7.2 Significant Unavoidable Effects 7-1

8.0 REFERENCES 8-1
- 8.1 Report Preparation 8-1
- 8.2 Persons and Agencies Contacted 8-1
- 8.3 Literature Cited 8-1

APPENDICES

A Waterfront Area Aesthetic Criteria for New Development Assessment
B Waterfront Area Design Guidelines
C Local Coastal Plan Visual Resources Map
D Photographic Simulation Methodology
E View Angle Analysis
F Public Comments and Responses
G Seismic Sea Wave (Tsunami) Potential
H Lower Mission Creek Flood Control Project Feasibility Report, Alternative 12

4-22 View 15, Looking East from Intersection of Chapala and Mason Streets 4-95
4-23 View 16, Looking Toward Area A from Mason Street and Mission Creek Bridge 4-99
4-24 View 17, Looking South on Helena Avenue from Northeast Corner of Mason Street 4-103
4-25 View 18, Looking Toward Entrada Project Site from U.S. 101 West of State Street Bridge 4-107
4-26 View 19, Looking from Alameda Padre Serra Toward Entrada Project Site 4-111
4-27 Locations of Projects Considered in the Cumulative Impact Analysis 4-119
4-28 Overhead Point of View Diagram for View 1 4-125
4-29 Overhead Point of View Diagram for View 2 4-127
4-30 Overhead Point of View Diagram for View 3 4-129
4-31 Overhead Point of View Diagram for View 4 4-131
4-32 Overhead Point of View Diagram for View 5 4-133
4-33 Overhead Point of View Diagram for View 6 4-135
4-34 Overhead Point of View Diagram for View 7 4-137
4-35 Overhead Point of View Diagram for View 8 4-139
4-36 Overhead Point of View Diagram for View 9 4-141
4-37 Overhead Point of View Diagram for View 10 4-143
4-37a Overhead Point of View Diagram for View 10a 4-145
4-37b Overhead Point of View Diagram for View 10b 4-147
4-38 Overhead Point of View Diagram for View 11 4-149
4-39 Overhead Point of View Diagram for View 12 4-151
4-40 Overhead Point of View Diagram for View 13 4-153
4-41 Overhead Point of View Diagram for View 14 4-155
4-42 Overhead Point of View Diagram for View 15 4-157
4-43 Overhead Point of View Diagram for View 16 4-159
4-44 Overhead Point of View Diagram for View 17 4-161
4-45 Overhead Point of View Diagram for View 18 4-163
4-46 Overhead Point of View Diagram for View 19 4-165

APPENDIX FIGURES

C-1 Local Coastal Program, Visual Resource Map

D-1 Illustrations of the Computer Photo Simulation Methodology

E-1 View Sightlines to the Santa Ynez Mountain Range from the Entrada Project Site

E-2 Profile Sections Between the Entrada Project Site and Major Santa Ynez Mountain Peaks

TABLE OF TABLES

ES-1 Summary of Project Impacts on Important Public Scenic Views ES-9
4-1 Summary of Project Impacts on Important Public Scenic Views 4-114
4-2 Projects Considered in the Cumulative Impact Analysis 4-117
4-3 Important Public Scenic Views and Associated Overhead Point of View Diagrams and Possible Future Projects 4-121

EXECUTIVE SUMMARY

INTRODUCTION

This environmental impact report (EIR) discusses the potential consequences to public views which might result from the construction of the Entrada de Santa Barbara (Entrada) project, on a portion of[1] three blocks in Santa Barbara's Waterfront area near Highway 101. The California Environmental Quality Act (CEQA) requires the preparation of Environmental Impact Reports (EIRs) when projects, such as Entrada are determined to potentially result in significant impacts on the environment. EIRs are prepared in order to "identify the significant effects of a project on the environment, to identify alternatives to the project, and to indicate the manner in which such significant adverse effects can be mitigated or avoided" (California Code of Regulations, Section 15011). An EIR is intended to serve as an informational document for decision makers and the general public regarding the environmental consequences of a project.

This document's analysis is focused exclusively on project impacts to public views. Other environmental issues, such as air quality, biological resources, cultural resources, geology, noise, traffic and circulation, parking, water resources, public services, population and housing, ~~noise,~~ and hazardous materials have already been evaluated in a Mitigated Negative Declaration adopted by the Santa Barbara City Council in August 1999. More information on the project history and associated environmental review of the project which occurred prior to preparation of this Draft EIR is provided in Chapter 2.

The Draft EIR has been distributed to affected agencies and interested parties for a 45-day review period, in accordance with Sections 15087(e) and 15105(a) of the State CEQA Guidelines. During the 45-day public review period, which commences on February 6, 2001 and ends on March 23, 2001, the Draft EIR is available for review and/or copying at the following locations, pursuant to Section 15087(g) of the State CEQA Guidelines:

Planning Division, Community Development Department
City of Santa Barbara
630 Garden Street, 2nd Floor
Santa Barbara, CA 93102

City of Santa Barbara Public Library
Central Branch
40 East Anapamu Street
Santa Barbara, CA 93102

Interested parties may provide comments on the Draft EIR either in written form or verbally at the Draft EIR public comment hearing before the City Planning Commission. Written comments on the Draft EIR must be received by 4:30 p.m. on March 23, 2001, and should be addressed to:

Debra Andaloro, Project Planner
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102

[1] Revision marks appear as strikethroughs and underlines to show where deletions and additions have been made to this document since publication of the Draft EIR in February 2001.

and rehabilitation of several existing older buildings of both historical and architectural significance. The Entrada project is divided into three distinct sub-areas of real property, termed "Areas A, B, and C" as shown on the Area Plan (see Figure ES-1) for a development totaling approximately 133,000 net new square feet in size. The project has six inter-related components:

Redevelopment of Area A (5,368 square feet existing commercial/ retail space; 27 "time-share" units). Area A includes the existing "Californian Hotel," built in 1925 and located at 35 State Street, and adjacent property to the south on State Street. The four-story Californian Hotel (approximately 33,000 square feet of hotel space consisting of 96 hotel rooms), is a legally pre-existing non-conforming building as to its height, the number of stories, and setbacks. It would be seismically upgraded and remodeled to accommodate commercial retail uses on the ground floor and "time-share" units on the second, third, and fourth floors. Two three-story additions, similar in architectural style to the Californian Hotel, are proposed on the property abutting the existing structure to the south along State Street, an area currently occupied by a surface parking lot.

- *Redevelopment of Area B (4,588 square feet commercial/retail space; 30 "time-share" units).* Area B includes the existing "Hot Spots" café building, located at 36 State Street directly across the street from the Californian Hotel, and a beach rental shop. A total of 10,000 square feet of existing one-story buildings currently used for a variety of commercial uses would be demolished; the existing "Hot Spots" building would remain and would be incorporated into the new structure. When redeveloped, Area B would consist of two three-story buildings of a Spanish/Mediterranean style with a maximum height of 42 feet, containing 4,588 square feet of first floor commercial/retail space (more than half of which would include the restored 2,600-square-foot "Hot Spots" café building) and 30 "time-share" units on the first, second, and third floors, with subsurface parking for 48 vehicles.

- *Redevelopment of Area C (7,576 square feet commercial/retail space; 24 "time-share" units).* Area C extends from Mason Street north to the railroad right of way. The site includes existing auto detailing shops, "Jansen Marine," "Paddle Sports," and "Gessinger Wine Tasting." The project redevelopment would involve the demolition of approximately 10,000 square feet of existing commercial/retail space and the construction of 7,576 square feet of new ground-level commercial/retail space fronting on State Street. The existing "Santa Barbara Motors" building, about 2,500 square feet in size, would be relocated (and rehabilitated) to a point further up on the east side of State Street and incorporated into a new portion of a commercial space/time-share building. It would be used as a public visitor information/ tourist center through an agreement between the applicant and the City Redevelopment Agency. Area C would have 24 "time-share" units above the retail space and would be adjacent to a two-level parking structure.

- *Parking.* The Entrada project would provide a total of 210 vehicle parking spaces, including the Area C 145-space parking structure south of the railroad right-of-way between State Street and Helena Avenue. Within the parking structure 97 of the spaces would be reserved for use by the time-share owners, the remaining 48 parking spaces would be available to any member of the public on the same basis as a City-operated parking structure or lot – i.e., (currently) a 75-

minute period of free parking with low hourly rates thereafter.

- *State and Mason Street Improvements.* At the request of the City, the Entrada project proposes an agreement with the Redevelopment Agency of the City for the rehabilitation of three block faces of State Street sidewalk frontage and for extensive streetscape improvements at the intersection of State Street and Mason Street, including along the first blocks of east and west Mason Street. The purpose of this agreement is to extend the City's concept of the State Street pedestrian "Plaza" (as it presently exists in the Central Business District – along State Street from Gutierrez to Victoria Street) to the blocks of State Street between the Union Pacific Railroad tracks and Cabrillo Boulevard. The Entrada project also proposes making certain City public street right-of-way alterations including a reconfiguration of existing on-street public parking on Mason Street and Helena Avenue, a widening of the State Street sidewalks so that they are at least 15 feet wide from curb to building line, a reduction in the number of vehicle traffic lanes on State Street, and a redesign of the look of the State/Mason intersection.

- *Project Amenities.* Landscaped courtyard areas would be provided within Areas A, B, and C. Courtyards of Areas B and C would be accessible from paseos on State Street, Mason Street, and Helena Avenue, and would be open to the public during daylight hours. A traffic signal would be constructed at the intersection of State Street and Mason Street. The Entrada project would also relocate and restore the historic "Santa Barbara Motors" building on Area C. At the Redevelopment Agency's request, a public visitor/tourist information center and public restrooms would be located along the east side of State Street just south of the railroad tracks in the restored "Santa Barbara Motors" building.

The total land area to be redeveloped and rehabilitated by the Entrada project is approximately 2.41 acres (or about 104,000 square feet) in size. All total, the Entrada project proposes to demolish or rehabilitate approximately 31,000 square feet of existing commercial/retail space. When completed, the Entrada project would result in a net project total of 17,532 square feet of commercial/retail space of both new and rehabilitated building space. This represents a reduction of 13,759 square feet of commercial/retail space from the existing buildings on the site. The "time-share" portion (also called "vacation-units") of Entrada would consist of approximately 96,500 square feet of new and rehabilitated existing square footage in 81 separate time-share units (each with lock-out capability providing for the possibility of 162 units). In no instance would any new Entrada project building exceed the City's Charter height limitation of 45 feet (Charter § 1506) or the S.B.M.C. Title 28 zoning or Coastal Plan restrictions on height nor would it exceed the maximum number of stories allowed by the Municipal for the Coastal Zone (S.B.M.C. Code § 28.22.050).

PROJECT ALTERNATIVES

EIRs are required to examine alternatives to a proposed project including a "No Project" alternative. According to CEQA Guidelines Section 15126.6, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if the alternative would impede, to some degree, the attainment of project objectives or would be more costly.

cases does, have a direct affect on neighborhood compatibility, as does the size, bulk, and scale of a project.

The conclusion of this EIR is that the Entrada project would result in less than significant environmental effects to important public scenic views; however, changes to public views would occur. In the case of the Entrada project, the changes to public views would result from the project's size, bulk, and scale, and the change to public views is a component of neighborhood compatibility.

In considering the required findings for the Coastal Development Permit regarding important public scenic views, size, bulk, and scale, neighborhood compatibility, and sound community planning, City decisionmakers must determine whether the scale of the Entrada project as currently designed is appropriate or excessive for the area. Existing Coastal Act and City plans and policies demonstrate that the visual resources of this specialized area of the Coastal Zone are extremely important. Further design refinements may be considered by City decisionmakers in order to reduce the size, bulk, and scale of some portions of the buildings in order to provide a greater sense of visual openness in the project area which would potentially result in a higher level of neighborhood compatibility.

Based on the Entrada project's effect on public views, as identified in this EIR, it is anticipated that design changes considered may include, but not be limited to the following:

- Reducing some of the third-story elements in Area B to a two-story height;
- Increasing the width of the view corridor through the Area B paseo by eliminating second- and third-story structural elements on both sides of the view corridor;
- Increasing the width of the view corridor through the Area C paseo by eliminating second- and third-story structural elements on both sides of the view corridor; and
- Reducing some of the third-story elements in Area C located along State Street above its intersection with Mason Street.

Other issues associated with the Entrada project which may need to be resolved during the public hearing process on the merits of the Entrada project, include, but are not limited to, the following:

- Should the State Street sidewalks be widened as proposed?
- How and to what degree should the loss of lower-cost hotel units, with the conversion of the California Hotel to time-share vacation units, be mitigated?

CLASSIFICATION OF ENVIRONMENTAL IMPACTS

Potential environmental impacts on public views resulting from the Entrada project as a whole have been classified in the following categories:

Class I: Significant adverse impacts that cannot be feasibly mitigated or avoided. If the project is approved, decision makers are required to adopt a statement of overriding considerations pursuant to CEQA Section 15093, explaining why project benefits outweigh the damage caused by these significant environmental impacts.

Table ES-1. Summary of Project Impacts on Important Public Scenic Views

		Important Visual Resources[1]													Scenic Quality[1]		Public Viewpoint[1]		Significance Criteria[2]			
View		Santa Ynez Mountains	Shoreline	Open space	Historic buildings	Desirable per LCP Visual Resources Map	From Stearns Wharf, Chase Palm Park, and East Beach	Contrast between coastline and Santa Ynez Mountains	Views/ view corridors of ocean, harbor, Santa Ynez mts. from State, Garden, or Castillo streets, or Cabrillo Blvd.	Magnitude	Intactness	Distinctiveness	Public gathering area	Major transportation corridor	Areas of extensive pedestrian/bicycle use	Important public scenic view	Substantially degrade an important public scenic view	Substantially block an important public scenic view corridor	Substantially impair the visual context of the Waterfront area	Significant Impact to Important Public Scenic View
1	Cabrillo Blvd. at Helena Ave.	X										X		X	X		N	N	N	N
2	Dolphin Fountain	X				X	X		X	X	X	X	X	X	X	X	N	N	N	LTS
3	SW corner Cabrillo Blvd. at State Street	X				X	X		X	X		X	X	X	X	X	N	N	N	LTS
4	Cabrillo Blvd. west of State Street	X				X	X		X	X	X	X	X	X	X	X	N	N	N	LTS
5	NW corner Cabrillo Blvd. at State Street	X				X	X		X	X		X		X	X	X	N	N	N	LTS
6	State St. at Mission Creek Bridge	X							X	X	X	X		X	X	X	N	N	N	LTS
7	State St. south of Mason St.	X							X					X	X	X	N	N	N	LTS
8	Californian Hotel	X							X					X	X		N	N	N	N
9	Mason St. at State St.	X							X					X	X		N	N	N	N
10	BeBop Burgers	X							X					X	X		N	N	N	N
11	City Railroad Depot Entrance			X								X	X	X	X		N	N	N	N
12	City Railroad Depot Loading Area	X							X				X	X	X		N	N	N	N
13	Yanonali St. at State St.		X	X					X	X	X	X	X	X	X	X	N	N	N	LTS
14	Montecito St. Overpass		X	X					X			X		X			N	N	N	N
15	Mason St. at Chapala St.	X															N	N	N	N
16	Mason St. at Mission Creek Bridge	X															N	N	N	N
17	Helena Ave. at Mason St.			X								X					N	N	N	N
18	US 101 West of State St. Bridge			X	X						X	X		X		X	N	N	N	LTS
19	Alameda Padre Serra		X	X				X		X	X	X	X	X	X	X	N	N	N	N

[1] "X" denotes that a given view contains a particular important visual resource, has a particular scenic quality, or is from a particular type of public viewpoint. A blank cell indicates that no important visual resource, scenic quality, or public viewpoint is within the view.

[2] "N" denotes no impact, "NG" denotes a negligible but less than significant impact, and "LTS" denotes an adverse but less than significant impact.

View 11. These larger scale panoramic contextual view photos (wider and more realistic field of vision) demonstrate that, in the totality of visual circumstances and in view of the less than important nature of the two public views involved in these particular analyses, the Entrada project would not significantly impair a view characterized as not an important public scenic view.

Project Alternatives

Because no potentially ~~signficants~~significant environmental impacts were identified, no project alternatives other than the No Project alternative were identified. This alternative would result in fewer adverse but less than significant impacts on important public scenic views than the proposed Entrada project. However, the environmentally superior project other than the No Project alternative would be the proposed Entrada project.

Conclusion

The overall analysis of public view impacts contained within this focused EIR concludes that the Entrada project will result in an adverse, but less than significant impact on the environment (Class III). Consequently, no measures are necessary or required in order to mitigate the project's public view impacts to a less than significant environmental level.

At the same time, the City, in its review and consideration of the development application permits associated with the Entrada project, including review and consideration of its design for consistency with City land use and Coastal Act policies, may choose to further address any public view effects associated with the Entrada project. This could be accomplished through the imposition of additional project changes through conditions of approval related to the Entrada project's overall size, its architectural design, its setback from public streets, or related to the project's overall bulk and scale. Specifically, City staff may choose to recommend and the City Planning Commission or City Council may consider imposition of conditions of approval which require additional size, bulk, and scale reductions, particularly with respect to certain of the third story elements of project Areas B and C. In addition, the City may seek to increase the effect of the public view corridors currently proposed by the Applicants for Areas B and C of the project, such that the project's effect on public views are reduced to the extent possible and the project's view benefits are increased to the greatest extent feasible. These considerations are discussed further and in more detail in the section of this EIR entitled **Executive Summary, Areas of Controversy and Issues to be Resolved**.

1.0 INTRODUCTION

1.1 PURPOSE

This environmental impact report (EIR) discusses the potential consequences to public scenic views which might result from the construction of the Entrada de Santa Barbara project, on three blocks in Santa Barbara's Waterfront area near Highway 101. The California Environmental Quality Act (CEQA) requires the preparation of Environmental Impact Reports (EIRs) when projects, such as Entrada de Santa Barbara are determined to potentially result in significant impacts on the environment. EIRs are prepared in order to "analyze the significant environmental effects of a project, to identify alternatives, and to disclose possible ways to reduce or avoid the possible environmental damage" (State CEQA Guidelines, Section 15002[f]). An EIR is intended to serve as an informational document for decision makers and the general public regarding the environmental consequences of a project.

1.2 SCOPE

This document's analysis is focused exclusively on project impacts to public views. Other environmental issues, such as air quality, biological resources, cultural resources, geology, noise, traffic and circulation, water resources, public services, population and housing, noise, and hazardous materials have already been evaluated in a Mitigated Negative Declaration adopted by the Santa Barbara City Council in August 1999. More information on the project history and associated environmental review is provided in Section 2.4.

This EIR has drawn on pertinent policies, guidelines, existing reports, and extensive photographic simulations to determine baseline conditions and impacts.

The following categories for impact significance are used in this analysis:

- **Class I:** Significant adverse impacts that cannot be feasibly mitigated or avoided. If the project is approved, decisionmakers are required to adopt a statement of overriding considerations pursuant to CEQA Section 15093, explaining why project benefits outweigh the damage caused by these significant environmental impacts.

- **Class II:** Significant adverse impacts that can be feasibly mitigated or avoided. If the project is approved decisionmakers are required to make findings pursuant CEQA Section 15091, that impacts have been mitigated to the maximum extent feasible by implementation of mitigations. (This is also required for Class I impacts.)

- **Class III:** Adverse impacts that are less than significant. These impacts do not require that findings be made.

- **Class IV**: Beneficial impacts.

Alternatives to the proposed project consistent with CEQA requirements are detailed in Chapter 5.0.

The City distributed a Notice of Preparation for this Draft EIR on June 27, 2000, beginning the review period, which ended on July 27, 2000. The purpose of the public review period was to solicit comments on the scope and content of the environmental analysis to be included in the Draft EIR. In addition, the City held a public scoping hearing at the Planning Commission on July 13, 2000.

During the preparation of this Draft EIR, agencies, organizations, and persons who the City believes could have an interest in this project have been contacted. Information, data, and observations from these contacts are included in the EIR. Agencies or interested persons who did not respond during the public review period of the NOP will have an opportunity to comment during the public review period of the Draft EIR, as well as at subsequent hearings on the project.

This Draft EIR has been distributed to affected agencies and interested parties for a 45-day review period, in accordance with Sections 15087(e) and 15105(a) of the State CEQA Guidelines. During the 45-day public review period, which commences on February 6, 2001 and ends on March 23, 2001, the Draft EIR is available for review and/or copying at the following locations, pursuant to Section 15087(g) of the State CEQA Guidelines:

Planning Division, Community Development Department
City of Santa Barbara
630 Garden Street, 2nd Floor
Santa Barbara, CA 93102

City of Santa Barbara Public Library
Central Branch
40 East Anapamu Street
Santa Barbara, CA 93102

Interested parties may provide comments on the Draft EIR either in written form or verbally at the Draft EIR public comment hearing. Written comments on the Draft EIR must be received by 4:30 p.m. on March 23, 2001, and should be addressed to:

Debra Andaloro, Project Planner
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102

or emailed to dandaloro@ci.santa-barbara.ca.us, or delivered to the Community Development Department at 630 Garden Street, 2nd Floor, Santa Barbara.

The public hearing on this Draft EIR will be held at the City of Santa Barbara Planning Commission Meeting at City Hall, De La Guerra Plaza, on March 15, 2001. A meeting agenda with the hearing time will be available Monday March 12, 2001 at 630 Garden Street.

Upon completion of the 45-day public review period, written responses to all comments on environmental issues discussed in the Draft EIR will be prepared and incorporated into the Final EIR. Written responses to comments received from any state agencies will be made available to these agencies at least 10 days prior to the public hearing at which the Certification of the Final EIR will be considered. These comments, and their responses, will be included in the Final EIR for consideration by the City of

1.6 REQUIRED APPROVALS BY THE CITY OF SANTA BARBARA

This EIR will be used in connection with permits and other discretionary approvals necessary for the implementation of the proposed project. The proposed project would require the following discretionary approvals by the City of Santa Barbara Planning Commission and City Council:

- **Development Plan** to allow for the proposed new non-residential development as part of a transfer of existing development rights (TEDR);
- **Transfer of Existing Development Rights** to allow for the internal transfer of exiting development rights among the three proposed project areas;
- **Tentative Subdivision Map** for areas A, B, and C, to allow for the creation of condominiums for sale as vacation timeshare units and commercial/retail units;
- **Coastal Development Permits** to allow the following:
  1. Proposed development on Area A within the appealable jurisdiction of the Coastal Zone;
  2. Proposed development on Area B within the non-appealable jurisdiction of the Coastal Zone;
  3. Proposed development on Area C within the non-appealable jurisdiction of the Coastal Zone;
  4. Subdivision of the project site; and
  5. Street improvements proposed jointly by the City of Santa Barbara Redevelopment Agency and the Applicant.
- **Modification** to provide less than the 232 parking spaces required by code;
- **Modification** of the required HRC-II building setback requirements along State Street, Mason Street, and Helena Avenue;
- **Modification** to allow for exterior alteration to the fourth floor of the existing Californian Hotel, a portion of an existing non-conforming building that exceeds the 45-foot height limit defined by City Charter Section 1506.
- **Community Priority Square Footage Allocation** to allow for a maximum of 2,500 square feet of non-residential development to be permitted under City Charter Section 1508 (Measure E) for the proposed VIC (SBMC § 28.87.300).

1.7 OTHER AGENCY REVIEW AND APPROVALS

Based upon current information regarding the scope of the proposed project and its potential environmental impacts, there are no local, state, or federal, responsible or trustee agencies with permit authority over all, or a portion, of the proposed project. However, the Lead Agency will send this EIR to the State Clearinghouse, and a 45-day review period will satisfy the procedural requirements of State CEQA Guidelines Sections 15087(e) and 15105(a).

1.9 DOCUMENT ORGANIZATION

This EIR has been designed for easy use and reference. To help the reader locate information of particular interest, a brief summary of the contents of each section of the EIR is provided.

Executive Summary. This section contains an overview of the scope of the EIR, as well as an introduction to the project and its objectives, a summary of environmental impacts, proposed mitigation, level of significance after mitigation, and unavoidable impacts.

Chapter 1.0 Introduction. This chapter describes the basic purpose of the EIR and the environmental review process.

Chapter 2.0 Project Description/History. This chapter provides an overview of the proposed project and a detailed summary of its prior history of review by the City.

Chapter 3.0 Land Use and Policy Considerations. This chapter explains the relevant state and city public view plans and policies relevant to the proposed project.

Chapter 4.0 Public View Analysis. This chapter presents a discussion of the existing setting within the project area and vicinity, identifies potential consequences or impacts that would result on public scenic views surrounding the project site, and addresses the project's contribution to regional impacts (cumulative impacts) resulting from the project in combination with past, present, and reasonably probable projects identified by the City.

Chapter 5.0 Project Alternatives. This chapter presents the No Project alternative.

Chapter 6.0 Impacts Found Not to be Significant. This chapter discusses the major conclusions of the Second Revised Initial Study and Revised Mitigated Negative Declaration (May 1999), and the direction of the Court (May 30, 2000) which have lead to the preparation of this EIR.

Chapter 7.0 Other CEQA Sections. This section provides a summary of the proposed project's potential to lead to population growth and the indirect implications of that growth on public views within the city.

Chapter 8.0 References. This section identifies the individuals responsible for the preparation of this EIR, those public and private agencies and individuals contacted during the preparation of this report, and all references used and cited in the preparation of this report.

Appendices. Appendices include supporting materials that provide greater detail related to the EIR analysis.

2.0 PROJECT DESCRIPTION/HISTORY

2.1 PROJECT SUMMARY

Project Title:	Entrada de Santa Barbara
Project Location	Three Areas, A,B, and C, occupying addresses 22 through 120 State Street and 15 E. Mason Street, in the City of Santa Barbara
Assessor's Parcel Nos.:	Area A: 033-102-004, -014 Area B: 033-111-001, -002, -003 Area C: 033-081-003, -004, -005, -010, & -011.
Parking for VIC:	033-075-012
Site Size(s):	Area A: 20,808 square feet Area B: 32,510 s.f. Area C: 51,463 s.f. Total: 2.41 acres
Existing Land Use:	31,511 square feet of retail and 33,004 square feet of 96-room hotel (vacant)
Proposed Land Use:	17,532 square feet of retail, 2,500 square feet VIC, and 81 vacation ownership units (each with a lock-out unit providing for the possibility of 162 units).

Applicant:

S. B. Beach Properties, a California Limited Partnership
120 El Paseo
Santa Barbara, CA 93101

City Redevelopment Agency
630 Garden Street
Santa Barbara, CA 93102

Landowners:

S. B. Beach Properties, a California Limited Partnership et. al.
120 El Paseo
Santa Barbara, CA 93101

2.2 PROJECT LOCATION AND LAND USE DESIGNATIONS

The Entrada de Santa Barbara ("Entrada") development project is located within portions of three city blocks, including street and sidewalk areas of properties along State Street, between Cabrillo Boulevard and the Union Pacific Railroad tracks, in the lower State Street/Waterfront Area of the City of Santa Barbara. It includes portions of the "00" and "100" blocks of lower State Street. This area is zoned as "Hotel and Related Commerce" (the "HRC-2" zone) and is within the Local Coastal Overlay Zone (the "SD-3" Zone) of the City's certified Local Coastal Program (the "LCP"), with Area A being also within the appeal jurisdiction of the state Coastal Commission. The regional and site location of the proposed project are shown on Figures 2-1 and 2-2.

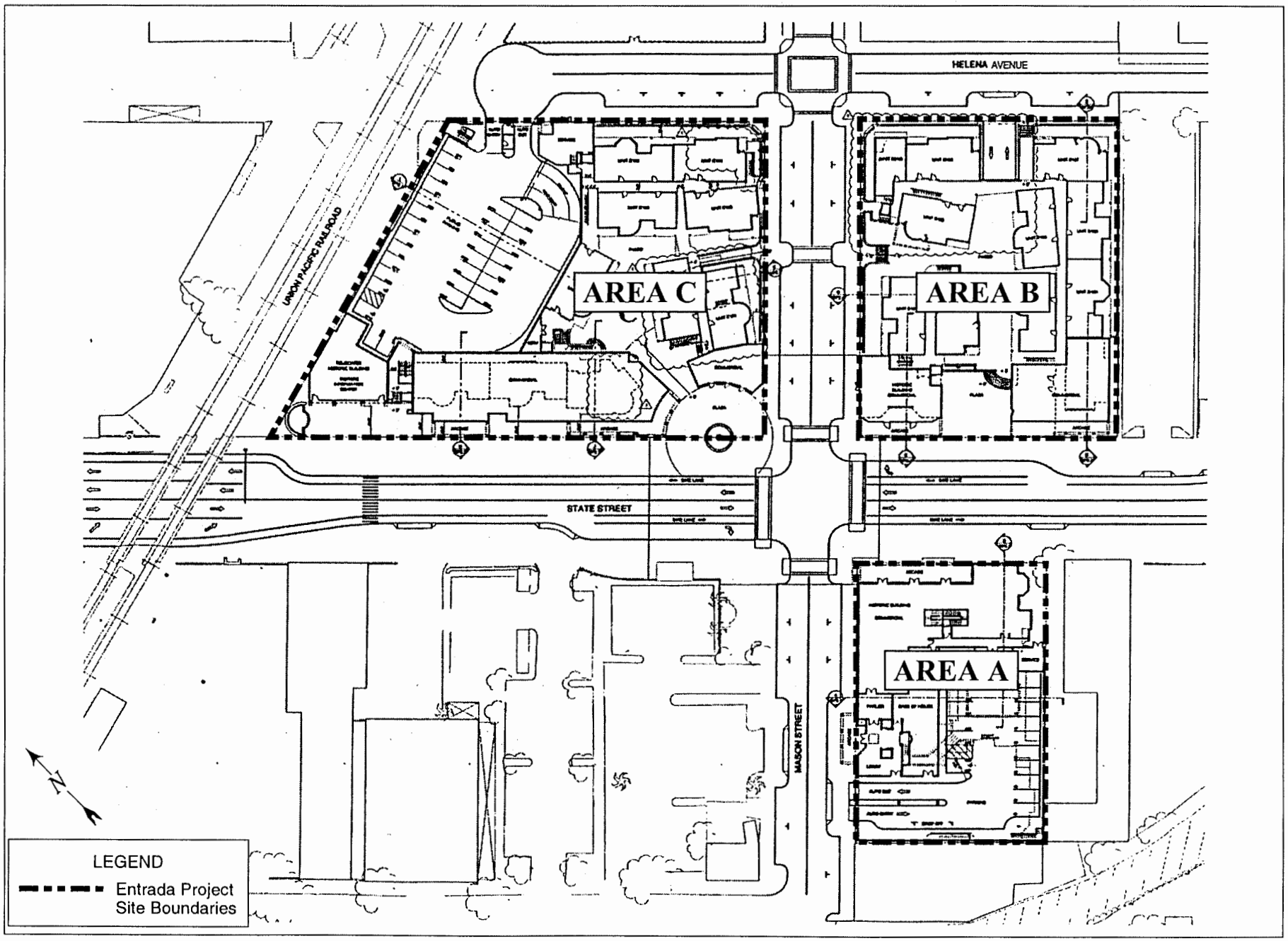


Figure 2-2. Area Location

(Charter § 1506) or the City's S.B.M.C. Title 28 zoning or Coastal Plan restrictions on height nor would it exceed the maximum number of building stories allowed by the Santa Barbara Municipal Code for the Coastal Zone (S.B.M.C. Code § 28.22.050).

Redevelopment of Area A

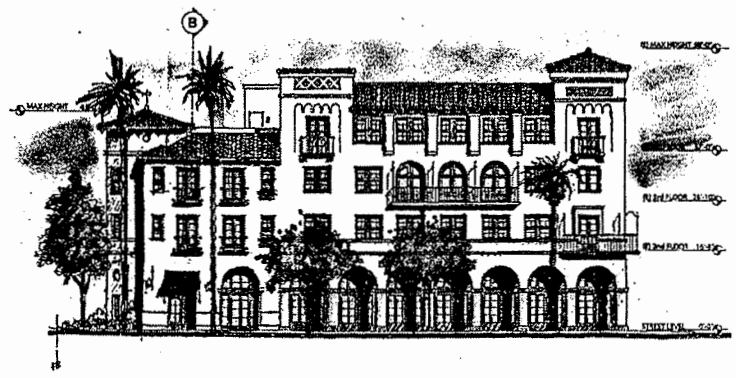
Area A includes the existing "Californian Hotel," built in 1925 and located at 35 State Street, and adjacent property to the south on State Street (see Figure 2-3). The four-story Californian Hotel (approximately 33,004 square feet of hotel space consisting of 96 hotel rooms), is legally pre-existing non-conforming building as to its height, number of stories, and setbacks. It would be seismically upgraded and remodeled to accommodate time-share units on the second, third, and fourth floors. Two three-story additions, similar in architectural style to the Californian Hotel, are proposed on the property abutting the existing structure to the south along State Street, an area currently occupied by a surface parking lot. A total of 27 vacation ownership units (or 54 units when counting lock-out units) are proposed in the Californian Hotel. The hotel's existing ground floor space, most recently devoted to bar and restaurant uses, would be redeveloped into 5,368 square feet of commercial retail space for similar uses. (The existing Californian restaurant/bar space is also part of the Entrada project's overall total retail/commercial space of 17,532 square feet) Parking for 17 cars is proposed on Area A. The parking on Area A would be for the exclusive use of the time-share units and would have access directly from Mason Street through a drive-through cut to be made through the first floor of the Californian Hotel off of Mason Street into the rear of the property.

Redevelopment of Area B

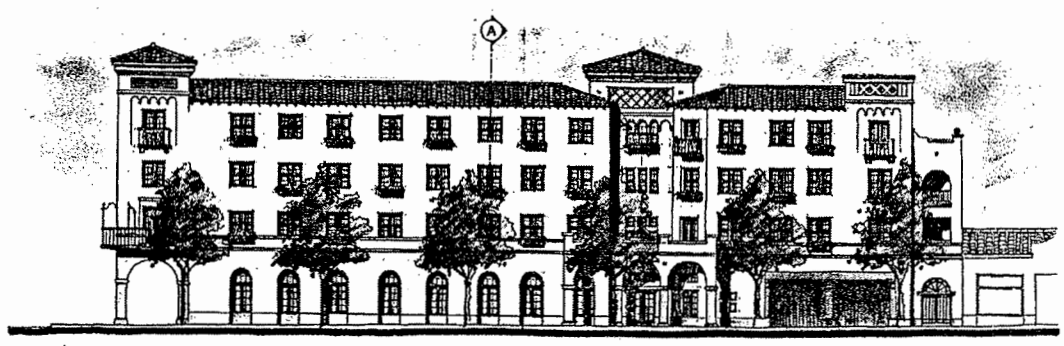
Area B includes the existing "Hot Spots" café building, located at 36 State Street directly across the street from the Californian Hotel, and a beach rental shop (see Figure 2-4). The "Hot Spots" café is the former "Hitchcock Motors" building built in 1925 (the approximately 2,600 square feet street-frontage portion only). A total of 10,000 square feet of existing one-story buildings currently used for a variety of commercial uses would be demolished; the existing 2,600 square foot "Hot Spots" building would remain. When redeveloped, Area B would consist of two and three-story buildings of a Spanish/Mediterranean style with a maximum height of 42 feet, containing 4,588 square feet of first floor commercial/retail space (more than half of which would be included within the restored 2,600 square foot "Hot Spots" café building) and 30 time-share units on the first, second, and third floors, with subsurface parking for 48 vehicles.

Redevelopment of Area C

Area C extends from Mason Street north to the railroad right of way (see Figure 2-5). The site includes existing auto detailing shops, "Jansen Marine," "Paddle Sports," and "Gessinger Wine Tasting." The "Paddle Sports" structure at 100 State Street is the former "Santa Barbara Motors" building built in 1947. Area C would involve the demolition of approximately 10,000 square feet of existing commercial/retail space and the construction of 7,576 square feet of new ground-level commercial/retail space fronting on State Street. The "Santa Barbara Motors" building, about 2,500 square feet in size, would be relocated (and rehabilitated) to a point further up on the east side of State Street and incorporated into a new portion of a commercial space/time-share building. The City Redevelopment Agency is proposing that it be used as a public visitor information/tourist center. Area C would have 24 time-share units above the retail space and would be adjacent to a two-level parking structure containing 145 spaces with vehicle ingress and egress from Helena Avenue only. Most of the parking structure would be reserved as parking for the time-share units, but some of it would be used for public retail parking. For the most part, the two-level parking structure would not be visible from State

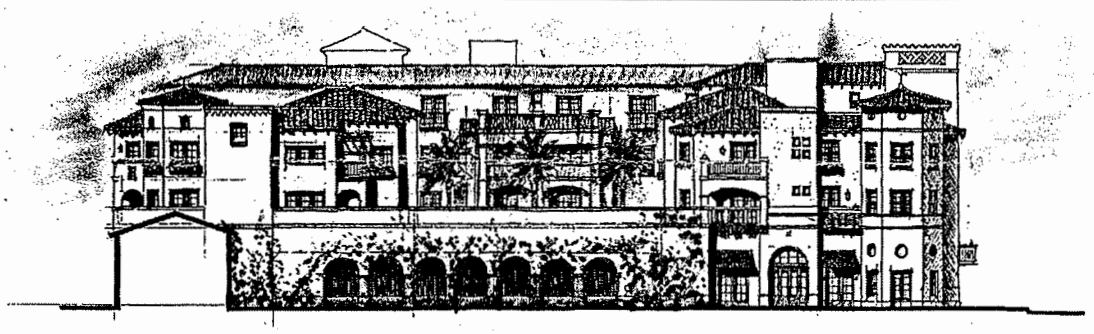


AREA A - STATE STREET ELEVATION

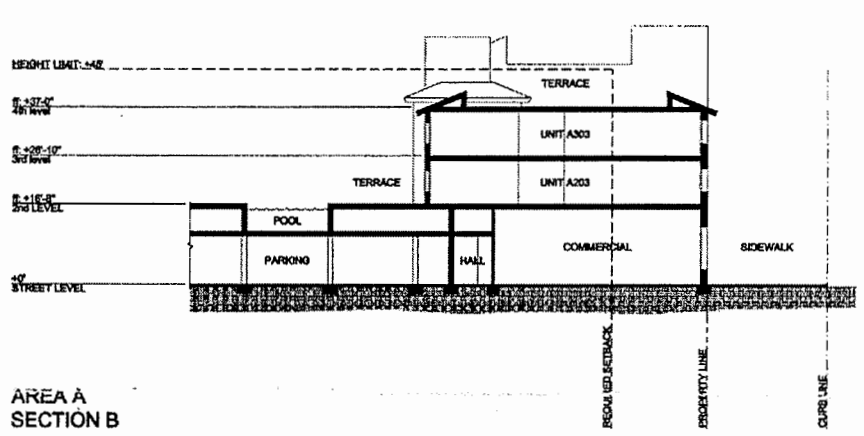


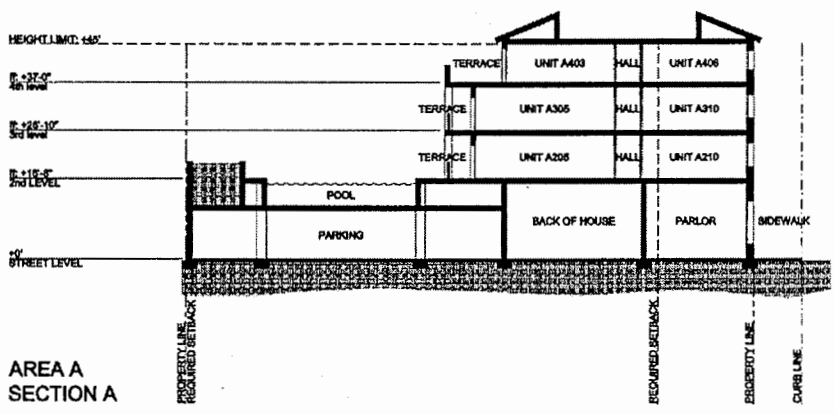
AREA A - MASON STREET ELEVATION

AREA A - MISSION CREEK ELEVATION



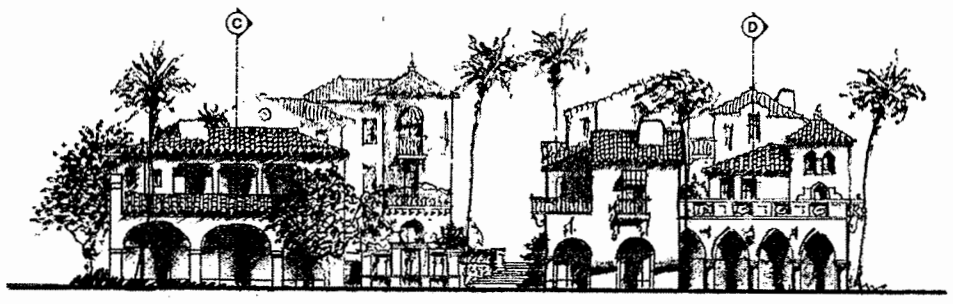
AREA A - WATERFRONT ELEVATION





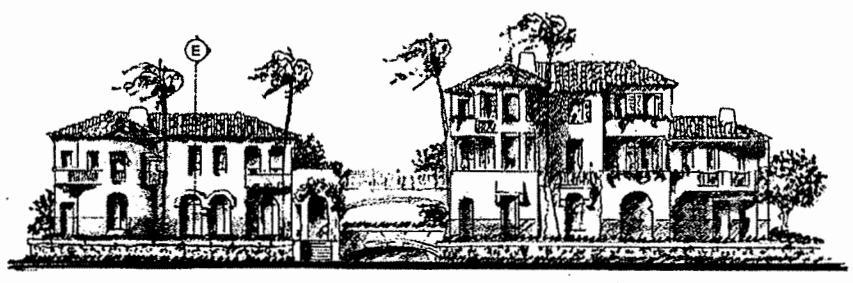
Source: David Van Hoy

Figure 2-3. Area A Exterior Elevations and Sections



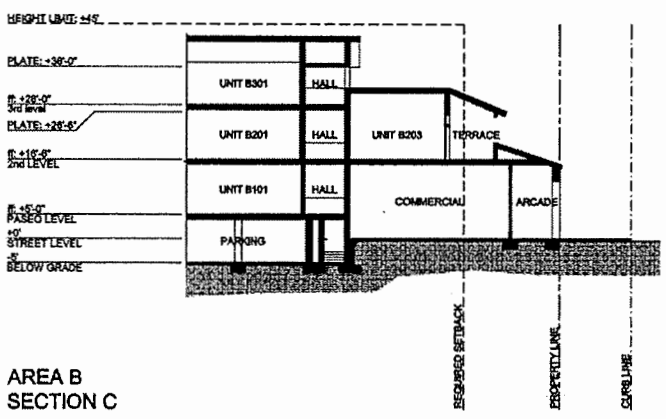
AREA B - STATE STREET ELEVATION

AREA B - MASON STREET ELEVATION

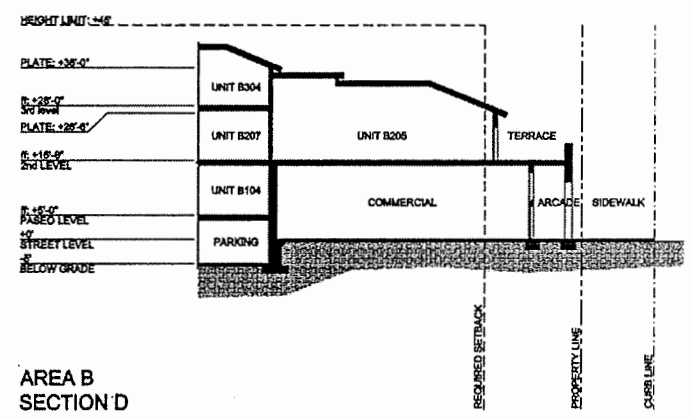


AREA B - HELENA STREET ELEVATION

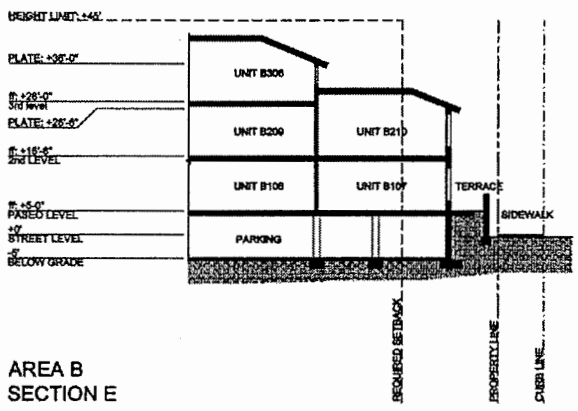
AREA B - WATERFRONT ELEVATION



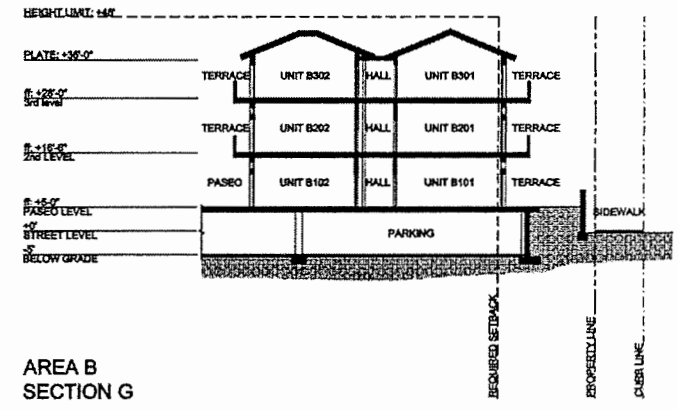
AREA B
SECTION C



AREA B
SECTION D



AREA B
SECTION E



AREA B
SECTION G

Source: David Van Hoy

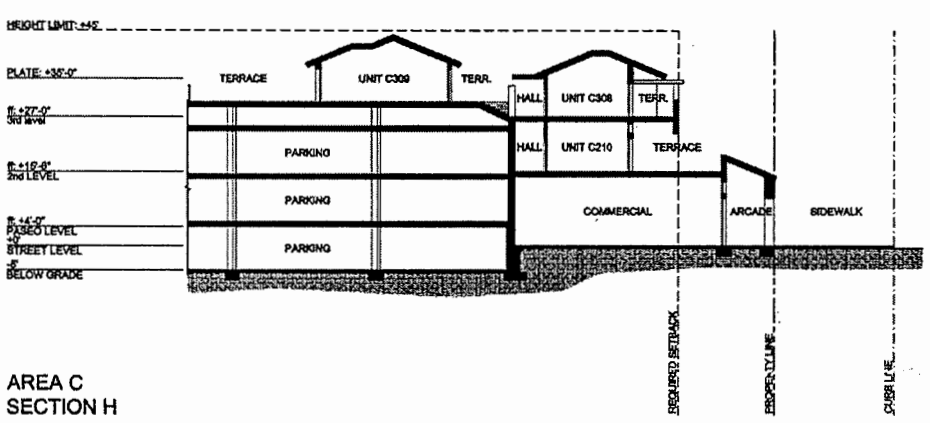
Figure 2-4. Area B Exterior Elevations and Sections

AREA C - STATE STREET ELEVATION

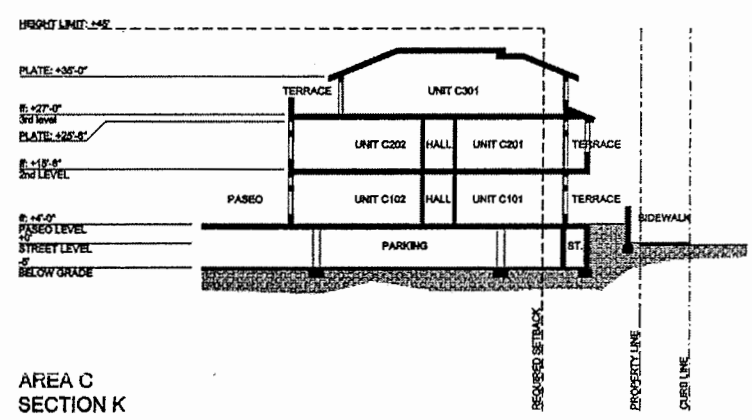
AREA C - MASON STREET ELEVATION

AREA C - HELENA STREET ELEVATION

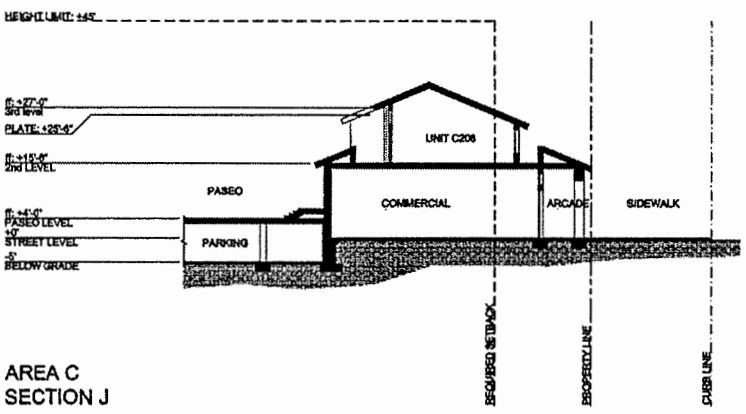
AREA C - RAILROAD ELEVATION



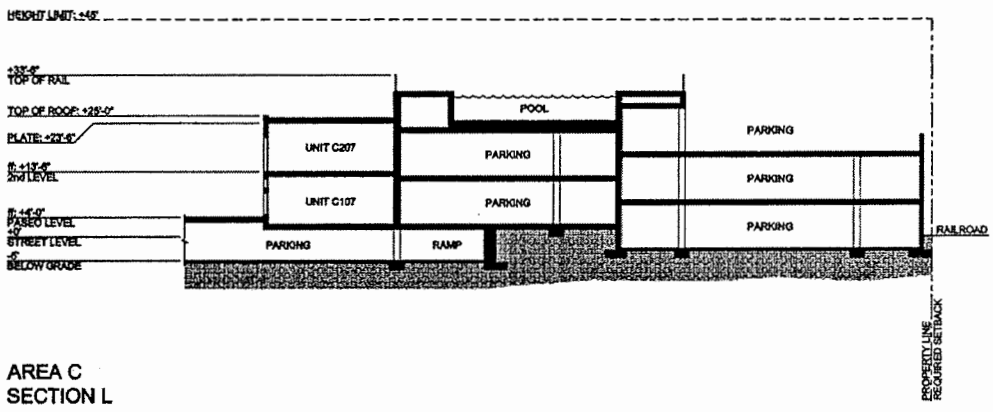
AREA C
SECTION H



AREA C
SECTION K



AREA C
SECTION J



AREA C
SECTION L

Source: David Van Hoy

Figure 2-5. Area C Exterior Elevations and Sections

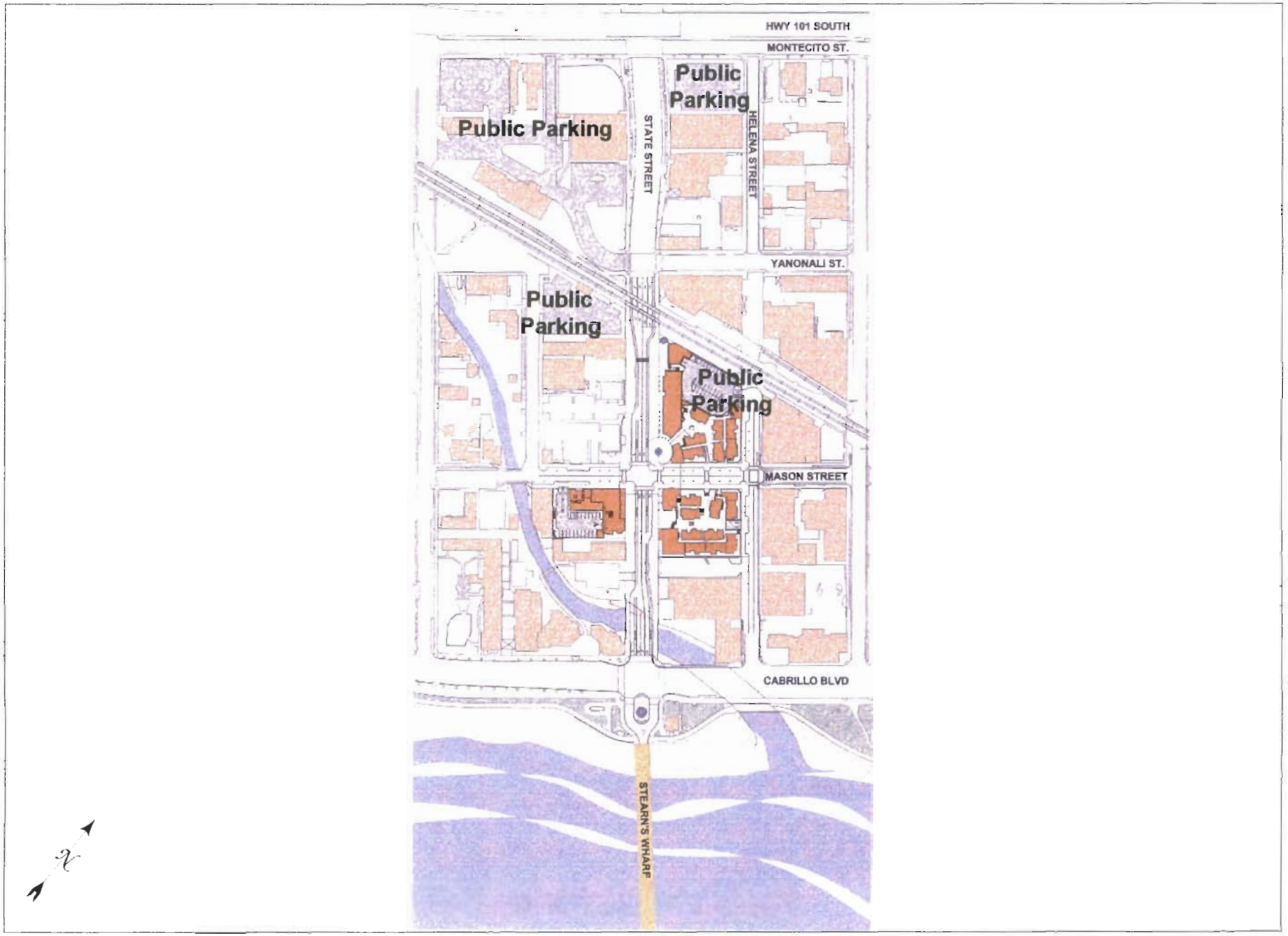


Figure 2-6. Public Parking within a Short Walking Distance of the Entrada Project

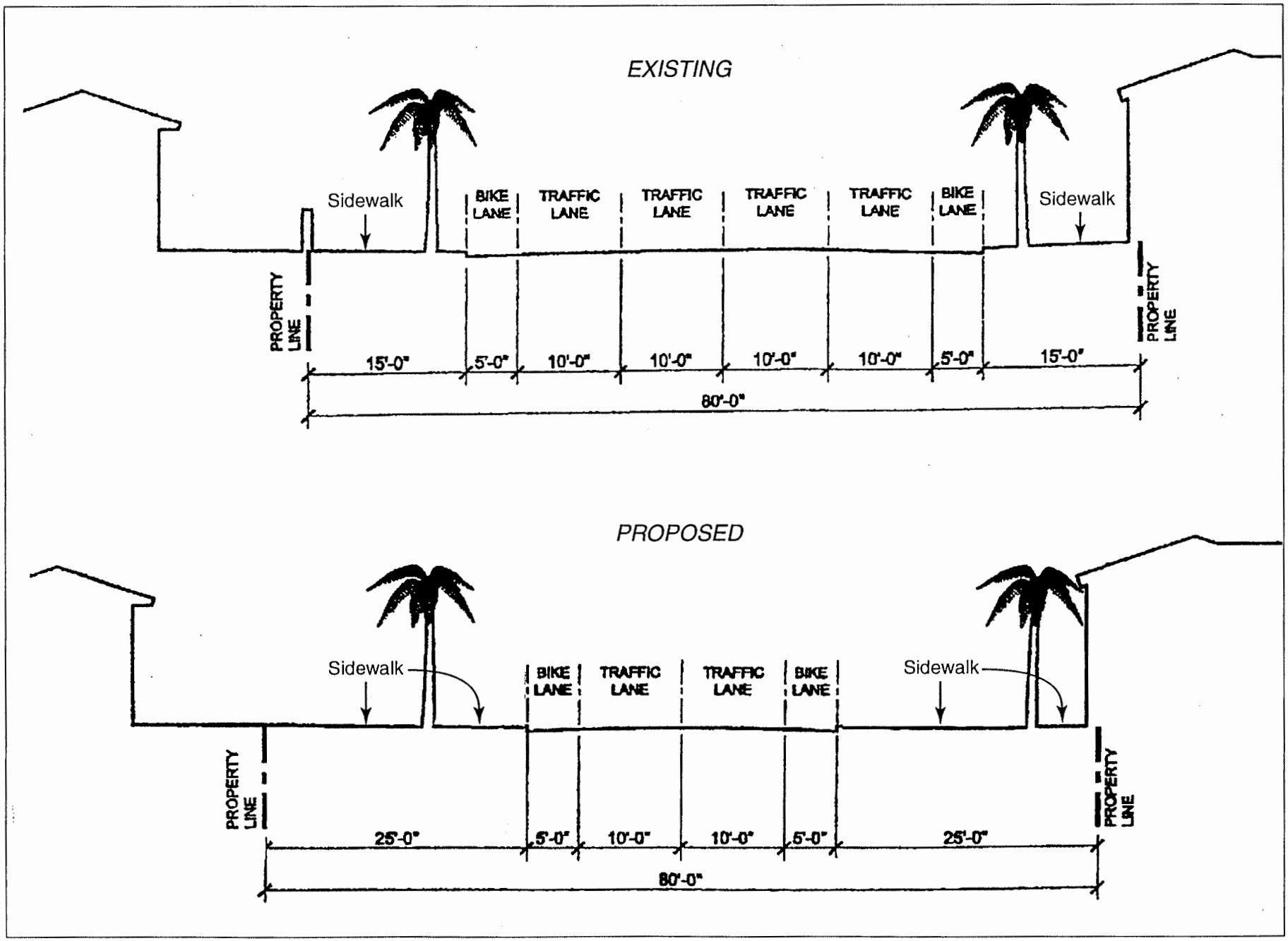


Figure 2-7. Existing and Proposed Lower State Street 00 Block Sidewalk Cross-Sections

These Redevelopment Projects are also in addition to traffic and circulation improvements undertaken by the City in public vehicular and pedestrian access to the Waterfront area and Cabrillo Boulevard completed in the last few years. These circulation improvements include the extension of Garden Street from the Garden Street/101 interchange to Cabrillo Boulevard, the extension of Calle Cesar Chavez (formerly Salsipuedes Street) to Cabrillo Boulevard, and the connection of Yanonali Street from Garden to Calle Cesar Chavez (see Figure 2-9 for an existing aerial photo of this area of the Waterfront).

Project Amenities

Landscaped courtyard areas would be provided within Areas A, B, and C. Courtyards of Areas B and C would be accessible from paseos on State Street, Mason Street, and Helena Avenue, and would be open to the public during daylight hours. A private health club, pool, and snack bar would be available to project occupants only.

The Entrada project would also relocate and restore the historic "Santa Barbara Motors" building on Area C in order to construct a public visitor/tourist information center and public restrooms along the east side of State Street just south of the railroad tracks and the Depot. Use of this "Visitor Information Center" ("VIC") would be conveyed to the Redevelopment Agency which would, in turn, contract for the operation of public information visitor center and for the operation and maintenance of the restrooms. The restrooms would be open to the public beyond normal business hours seven days a week. The Visitor's Center would provide its required public parking within the new City owned surface public parking lot previously approved at the 125 State Street (across the street from Entrada Area C), which would be a part of the Redevelopment Agency's recently completed Railroad Depot Restoration Project.

2.4 PROJECT HISTORY

2.4.1 City Design Concept Review – May 1998 Through December 1998

The proposed Entrada project was submitted to the City of Santa Barbara for development and Coastal Act permitting review on May 22, 1998 by the property owners, S.B. Beach Properties, L.P., as a major revision to previously submitted Development Review, Coastal Development Permit, and Subdivision Applications.[3]

The basic elements in the original May 1998 design included primarily two and three-story buildings, minimal building setbacks from State and Mason streets, the absence of a public visitor's center, the absence of any view-corridors through the project, vehicular access to a four-level high parking structure from State Street, and the encroachment of the parking structure into Helena Avenue. While the original May 1998 Entrada project design included streetscape improvements along State Street and Mason Street, it did not include the proposed wider State Street sidewalks nor did it propose the extensive improvements to the streetscape that are currently a part of the revised Entrada application.

---

[3] A prior development was proposed by the same Applicants in July 1997 for a project called "Santa Barbara Beach Village." "Beach Village" consisted of approximately 60,000 of net new square feet of street level commercial and office space, 53 new residential ownership condominiums, the renovation of the Californian Hotel (as an 82 room first-class hotel) along with 330 parking spaces for the entire Project, some which would have been located in a multi-level parking structure. The "Beach Village" project was conceptually reviewed in joint City Planning Commission-Historic Landmarks Commission public meetings held in December of 1997 and on January 15, 1998. The "Beach Village" application received a negative reception as to its size and scale from both the HLC and the Planning Commission.

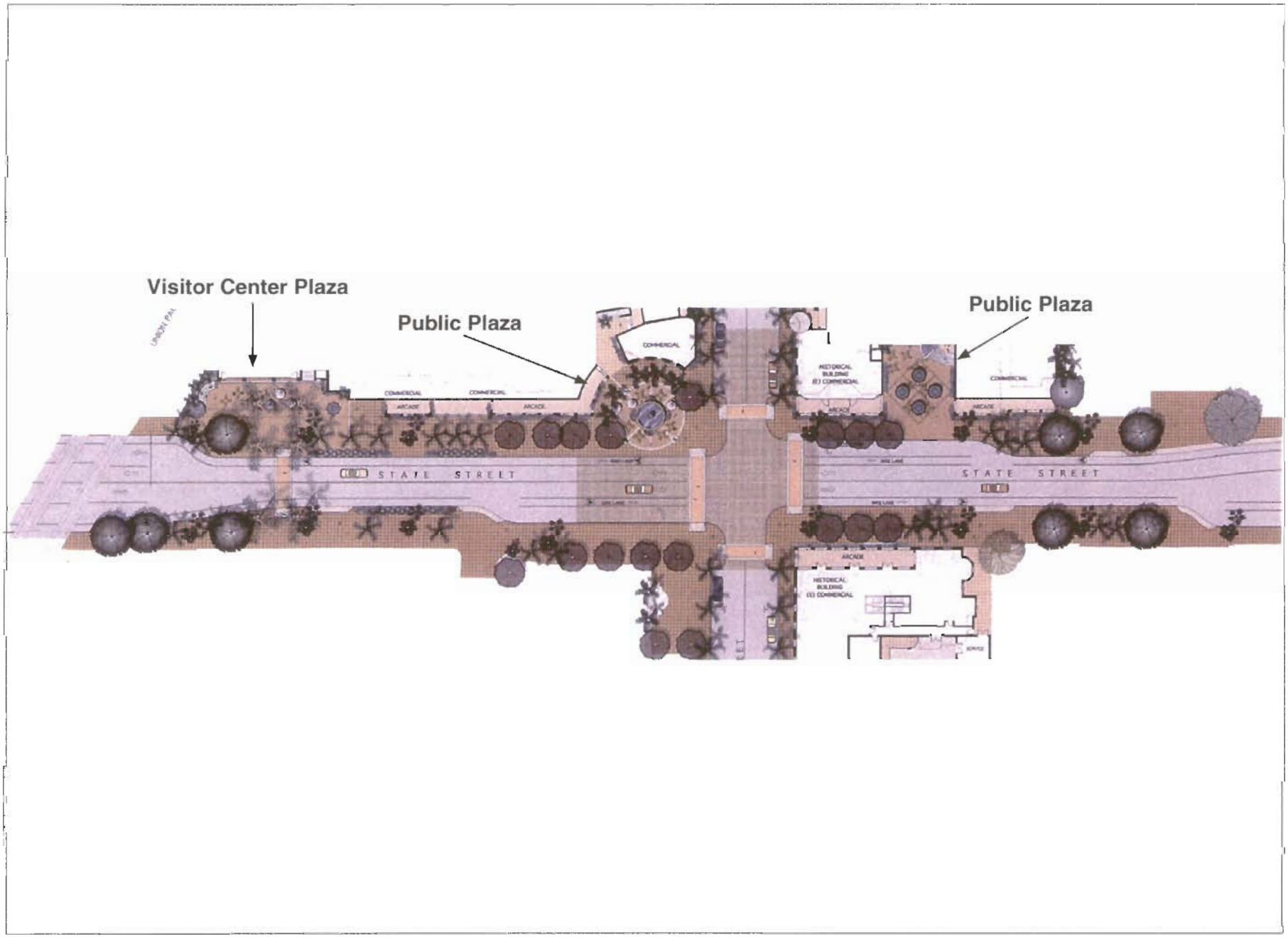


Figure 2-8. Schematic Streetscape and Intersection Improvements for State and Mason Streets

Figure 2-9. Redevelopment Projects in the Waterfront Area

The City Planning Commission conceptually reviewed the original Entrada project design for the first time in July of 1998. At that meeting, City Planning Staff and the Applicants presented a description of the substantial differences between the Applicant's former "Beach Village" proposal (see footnote 2) and the revised project which they called "Entrada de Santa Barbara." The Planning Commission was supportive of the overall Entrada project concept but offered certain specific comments for revisions.

- The Planning Commission suggested pedestrian friendly paseos in and around the proposed project;
- The Planning Commission suggested elimination of the entrance to parking structure from State Street;
- The Planning Commission appreciated and encouraged the varied configuration of street and building height setbacks in the current Entrada proposal;
- The Planning Commission was supportive of the "time-share" concept;
- The Planning Commission preferred fewer ground-level time-share units and more commercial use on Mason Street; and
- The Planning Commission expressed general support for the project size, setbacks, and the scale of Entrada proposal.

At the conclusion of the July 1998 concept review, the Planning Commission specifically asked the Entrada project Applicants to address the following concerns for the next Commission concept review of the Entrada project:

- The possible ways to develop more open space in and around the project;
- A need to provide more information regarding the possible view corridors for the "Riviera" area of Santa Barbara and of the Santa Ynez Mountains;
- A need to work with City Transportation Staff on street design and parking lot access;
- A need to re-study the feasibility of access to the parking structure from Mason Street or Helena Avenue instead of State Street;
- The possible ways to provide additional information regarding development floor-area ratio comparisons for other developments along State Street;
- A need to provide additional information regarding the proposed time-share and "lock-out" unit concept; and
- A need to provide additional information regarding the relocation of existing beach uses, especially the "beach" recreational uses such as bike and kayak rentals.

As a result of this conceptual direction by the Commission, the Entrada project was extensively revised and the Applicants re-submitted it to the City Planning Staff in August of 1998. The substantial differences from the original May 1998 Entrada design included the following:

- The removal of the vehicular entrance to the parking structure from State Street;
- The incorporation of the historically significant 100 State Street building (the "Santa Barbara Motors" building) into the project design; and

- Limit architectural styles;
- The HLC would appreciate a model of the project;
- Proper landscaping of the waterfront (south) elevation of the hotel is crucial;
- The HLC prefers that the arcade, which relates to the existing facade, be extended to State Street; and
- Simplify the addition to the Californian Hotel.

Areas B and C:

- Simplify the architectural details;
- Study the relationship between both Areas B & C to its Helena Avenue neighbors, the so-called "funk" zone and the industrial areas east of Helena Avenue;
- Study being more sympathetic to the parking structure openings along Helena Avenue;
- The landscaping on Mason Street is very important;
- Study the possibility of more variation of floor levels;
- Study allowing the massing to be the architecture rather than adorning the building with architecture and let the simplicity of the building prevail;
- Study having variation between two, three or even four story elements;
- Study skewing parts of the project, but not let it have a post-modern feel;
- Study possibly having less fenestration, perhaps incorporating more blank walls; and
- Study creating a way of encouraging public activity throughout the paseos by adding a restaurant or café.

2.4.3 The City Environmental Review of the Entrada Project under the California Environmental Quality Act

2.4.3.1 *The Decision To Use A Mitigated Negative Declaration – December 1998*

The overall conceptual direction provided by both the City's Planning Commission and the Historic Landmarks Commission in the period between the first project application in May 1998 and December 1998 was generally positive but included general Entrada re-design demands. Apparently, these changes were intended by both the HLC and the Planning Commission to reduce the possible negative environmental impacts of the Entrada project, especially the potential for public scenic view impacts. As a result, over a period of over 6 months, from May through the environmental comment hearing in December 1998, the City's process of public hearing "concept" review provided the Applicants with the following clear design mandates concerning the possible environmental view impacts from the proposed Entrada project:

1. A clear direction to redesign the Entrada project to reduce its overall size and scale.
2. An unequivocal direction to redesign the height of the project in an effort to preserve and maintain and to "frame" significant mountain views as much as possible.
3. A direction to provide public pedestrian access through the project and to provide the "view corridors" that would come with such pedestrian and public access.
4. A need to make the project feel more open and inviting to pedestrians.

potential adverse impacts on public scenic views to a less than significant level.

For City Staff, these "design" mitigation measures could and would include reductions in building heights and building scale, the use of prominent "view corridors" through the development, increased landscaping, design amenities, undergrounding of all overhead utilities, and street frontage alterations, among other things. Consequently, City Staff (specifically, the City's Environmental Analyst) agreed with the Planning Commission that the project's possible adverse impacts on public scenic views could be mitigated to a less than significant level through an agreed upon redesign of the view corridor aspects of Entrada and through reductions in its overall size and scale.

In approximately January of 1999, the Applicants agreed to the Mitigation Measure (AES-1) as an expressly required condition of approval for the Entrada project. This condition of approval was included in a Revised Initial Study which was released for public review and comment on January 13, 1999. It read as follows:

> The Project shall provide for additional building setbacks, height variations, and façade variations along the State Street and Mason Street frontages, as required by the Planning Commission and Historic Landmarks Commission, to allow for view protection and visual openness in the project area.

The Revised Initial Study and the Draft Mitigated Negative Declaration were made available for public review and comments from January 1999 to February 1999. City Staff received numerous comments on the Revised Initial Study/Draft Mitigated Negative Declaration, both in writing and at a second public environmental comment hearing held before the Planning Commission on February 4, 1999.

At the February 1999 comment hearing, City Staff also informed the Planning Commission of its belief that mitigation measure AES-1 should be refined so that specific and definite performance standards could clearly be incorporated into the actual project description rather than simply be left undefined and deferred as part of the City's final design review process. In Staff's view, such design specifics would need to clearly demonstrate that any possible "significant adverse impacts" to public scenic views had been reduced to a less than significant level. Staff also noted that, prior to adopting the Mitigated Negative Declaration and taking action to approve the Entrada project, CEQA required an assurance of the Owner's full compliance with the suggested mitigation measures (i.e. the project's re-design in an acceptable manner). Staff's recommendation for accomplishing this was to actually incorporate the Entrada redesign features into the description of the project itself. In other words, the redesigned and reduced version of Entrada, as the approved "Project" and only the approved "Project," would constitute the acceptable mitigation of the potential public scenic view concerns.

During the February 4, 1999 public "comment" hearing, the Planning Commission also provided extensive observations on changes which the Commission felt would need to be incorporated into the design of Entrada in order to fully meet their intent of mitigation measure AES-1 and to achieve an "acceptable" project on its design merits as well. The Commission was clear that these changes would need to be well-defined by the project architect and well-understood before the Planning Commission could and would make the CEQA findings necessary for a Mitigated Negative Declaration and would approve the Entrada project on its merits. As a result, the Commission indicated to the Applicants that they could not approve a Mitigated Negative Declaration until they had

3. Paseos:

   - The need to make the paseos more open and inviting to pedestrians.
   - The need to consider attractive commercial uses inside the paseos.

4. Protection of Public Views:

   - The need to understand how views are "created" as well as protected.
   - The need to consider reducing building heights or locations.
   - The related need to possibly reduce the number of time-share units if necessary.

5. The Need for More Information:

   - Agreed with Staff recommendation that additional "view study" with sight lines to the Santa Ynez Mountains be prepared for the project.
   - The need to review how view protection would be legally binding.
   - The need for new area cross-sections of the project architecture and the existing adjacent buildings
   - The need for computer generated scale sight-line studies showing the project and the scenic views from the pedestrian viewpoint.

According to Community Development Director, Dave Davis, these concerns raised a number of questions that the Planning Commission agreed would need to be further addressed, in detail, before action could be taken to adopt the proposed Mitigated Negative Declaration or, thereafter, to approve Entrada on its merits.

Consequently, following extended public hearings in March and April of 1999, and in an effort to comprehensively address the above-stated points with the Applicants, the Planning Commission decided to hold two joint Entrada project "work-sessions" with the City's Historic Landmarks Commission. Both of these work-sessions were noticed public meetings open to the public and for which written public comment was allowed.

2.4.3.2 *Two Planning Commission/HLC April 1999 Work-Sessions*

A Major Project Redesign

From these April 1999 work-sessions, the general framework of the Entrada project that was approved by the City Council in August 1999 finally began to emerge. In large part, the architectural concept for the project eventually approved was developed from a photograph presented by City Historic Landmarks Commissioner Tom Bollay. His concept depicted an old pedestrian-oriented street in a village in Spain framing a view of the mountains. Mr. Bollay's suggested approach seemed to set the tone for both the Planning Commission's and HLC's review of Entrada from that point forward.

During this time (i.e., April 1999) the Planning Commission was asking some very critical questions, both with respect to the environmental review necessary for the Entrada project and with respect to the Commission's ultimate review of Entrada on its design and land-use merits. These questions were the following:

- For environmental review (CEQA) purposes, were the substantial design revisions the Commission was demanding for the Entrada project buildings on Areas B and

- The inclusion of public scenic view corridors from State Street through the project to the "Riviera" and the Santa Ynez Mountains especially through a new public plaza on Area C and a similar "view corridor" through Area B.

- The inclusion of a 2,500 square foot City Visitor Information Center and public restrooms on Area C.

- Three open public plaza areas into Entrada along State Street.

- Plaza accessibility for the public to paseos through Entrada adjacent all the City streets.

- The availability of plazas and paseos for public use, such as for outdoor dining.

Both Commissions, the City Planning Commission and the City HLC, gave positive and favorable responses to this substantial Entrada project redesign. In short, both Commissions expressed the consensus view that the Applicants had made tremendous progress in a substantial redesign that properly addressed their prior concerns and, in their view, those of many of the public as well.

2.4.4 The Second Revised Initial Study of May 1999 and the Final Mitigated Negative Declaration

The outcome of the third round of City environmental review in the spring of 1999 was the "Second Revised Initial Study" (the "SRIS") and a Draft Mitigated Negative Declaration dated May 5, 1999. This review unequivocally concluded that the Entrada project, as then redesigned, would not have a potentially significant unmitigated adverse impact on public scenic views or on any other aspect of the physical environment. This conclusion was based on a review of the latest materials submitted by the Applicants and based on the Entrada project architect's responsiveness to the directions provided by the Planning Commission and Historic Landmarks Commission at the joint work sessions of April 1999. The Applicants had also extensively revised the Entrada project to include several features which previously would have been considered as possible mitigation of public scenic view impacts.

Following the April 1999 work session, the Applicants again submitted an official revised project application (with a full set of architectural plans) for another round of Staff formal environmental review under CEQA. Due to the substantive and significant nature of the April 1999 redesign, the City prepared a third Initial Study (SRIS) and proposed a new Mitigated Negative Declaration and re-circulated these documents for the required period of public and responsible agency review and comment mandated by CEQA.

Upon its review of this revision of the Entrada project and the receipt of public environmental comments on the SRIS and Mitigated Negative Declaration during May 1999, City Staff reached a definitive conclusion that the Entrada project application (as revised) met the substantial goals identified by the Planning Commission and Historic Landmarks Commission, particularly with respect to mitigating its possible adverse public scenic view environmental impacts to a less than significant level. Consequently, City staff had reached a point where it had determined a Mitigated Negative Declaration would achieve the appropriate level of environmental review and mitigation under CEQA (i.e., the lack of any possible unmitigated significant adverse impact). As a result, City Planning Staff recommended adoption of the SRIS/Mitigated Negative Declaration to the Planning Commission.

The SRIS and Draft Mitigated Negative Declaration were released for public review and comment from May 1999 to June 1999. The City received a number of comments on the SRIS and Draft Mitigated Negative Declaration, both in writing and at the

connection with possible environmental or public scenic view concerns, but simply with respect to the overall scale of the Entrada project. In response to this concern, the Commission crafted and imposed an additional condition of approval requiring the relocation of one time-share unit from either Area B or Area C into the interior of the development on Area A, (the existing Californian Hotel building). In other words, no new square footage would be added to the Californian but the scale of the Entrada project would be reduced by the equivalent of one time-share unit.

At the end of the July 1, 1999 public hearing, after a total of 12 hours of public hearing within one week's time (in addition to the previous 21 other public hearings on the Entrada project), the Planning Commission made the findings required by CEQA, adopted the Mitigated Negative Declaration for the project, and approved the Entrada project on its merits on a 5-1 vote, making several amendments to the exact wording of the recommended conditions of approval in order to address concerns raised by members of the public.

2.4.6 The City Council's Review and Approval of the Entrada Project on an Appeal

The City Council took up an appeal of the Planning Commission's approval of Entrada filed on August 10, 1999. Extensive presentations made by Dave Davis, the City's Community Development Director, and by the Entrada project architect, David Van Hoy, as well as a statement in support of the Entrada project from the Chair of the Planning Commission, Barbara Lowenthal, were presented. The number of people who wished to speak made it apparent to the City Council that a second hearing would be needed and, from the beginning, the Council indicated that their deliberations and their actual decision on Entrada would be continued one week. At the close of public testimony, the Council continued the Entrada hearing until August 17, 1999.

On August 17th, the Entrada hearing was reconvened, again with a full Council chambers. The Mayor made it clear that the public comment portion of the hearing had been closed, although the Entrada appellants were subsequently permitted to make certain points during the hearing. For the most part however, the August 17th hearing consisted of an extensive presentation by the Community Development Director, Dave Davis, especially with reference to the use of a Mitigated Negative Declaration for the Entrada project and the requirements of CEQA. Mr. Davis' responses and his presentation included a detailed explanation of the aesthetic, traffic, and parking analysis used in the Entrada SRIS and the Mitigated Negative Declaration.

The City Council's August 17, 1999 hearing on Entrada also lasted several hours. From the City's perspective, it was marked by the City Council's extensive questioning of City Staff and the Entrada consultants as well as by a responsive analysis from City staff regarding the City's process of environmental review for the Entrada project.

At the conclusion of the hearing, on a motion by City Councilmember Secord, seconded by Councilmember Garcia, all seven members of the Santa Barbara City Council unanimously adopted the findings necessary to adopt the Mitigated Negative Declaration for the Entrada project and voted to issue all of the necessary City approvals for the Entrada project. Concurrently, the City Council approved a City Resolution (City Resolution No. 99-098) making the necessary findings, including those necessary under CEQA and the State Coastal Act, and imposing a detailed series of 81 Conditions of Approval that included the mitigation measures and mitigation monitoring required by the City's Mitigated Negative Declaration.

Litigation over the manner of the City's environmental review of the Entrada project ensued shortly thereafter. The "Citizens Planning Association and the League of Women Voters of Santa

3.0 LAND USE AND POLICY CONSIDERATIONS

3.1 INTRODUCTION

Section 15125(d) of the CEQA Guidelines requires that EIRs discuss any potential inconsistencies between the proposed project, and applicable general plans and regional plans. The following provides a summary evaluation of the project's consistency with relevant public scenic view policies and regulations that guide development on the site and in its immediate vicinity. This analysis includes adopted City plans, policies and regulations, as well as relevant state plans, policies and regulations.

This summary evaluation differs from other EIR evaluations of plans and policies in that the proposed project has been reviewed by the City's Planning Commission and City Council. Each of the City's decisionmaking bodies has made the finding that the proposed project is consistent with relevant public scenic view plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, while typical EIR summary evaluations of plans and policies conclude with a statement specifying a project's *potential* consistency or inconsistency, this summary evaluation reports the findings made by the City's decisionmakers. These same decisionmakers will review this project again and are free to re-evaluate this consistency determination and to make any and all findings they may deem appropriate at that time.

In general, City plans are comprised of goals, policies and implementing actions. Goals are direction-setting statements that identify a future condition or state. A goal is a general expression of community values and is generally not quantifiable, time-dependent or suggestive of specific actions for its achievement. Policies are specific statements that guide decisionmaking. A policy is based on a plan's goals as well as the analysis of data, and is effectuated by implementing actions that are specific with respect to each project. Implementing actions or strategies are actions, procedures, programs, or techniques that carry out a policy.

In this section, adopted text, goals, policies and implementation strategies are presented in italics. Goals are followed by the policies and implementation strategies related to that goal. Each section is followed by a discussion of the project's consistency with that section, with conclusions shown in bold type.

3.2 CALIFORNIA COASTAL ACT

The California Coastal Act (California Public Resources Code §§30000 et seq) was enacted by the State Legislature in 1976 to provide long-term protection of California's coastline for the benefit of current and future generations. The California Coastal Act statutory policies are the heart of California's coastal protection program and constitute the standards used by the Coastal Commission in its coastal development permit decisions and for the review of local coastal programs (LCPs). The California Coastal Act includes the following policy which addresses view protection within coastal areas.

The relevant LCP visual resources policies include:

Policy 9.1 *The existing views to, from, and along the ocean and scenic coastal areas shall be protected, preserved, and enhanced. This may be accomplished by one or more of the following:*

(1) Acquisition of land for parks and open space;

(2) Requiring view easements or corridors in new developments;

(3) Specific development restrictions such as additional height limits, building orientation, and setback requirements for new development;

(4) Developing a system to evaluate view impairment of new development in the review process.

Actions

- *Delineate view corridor locations on new construction/ development plans by additional building limits, building orientation, and setback requirements.*

- *Establish standards of acceptable view protection to be utilized by developers, City staff, and discretionary bodies to ascertain a project's height, setback, and clustering of buildings.*

Policy 9.3 *All new development in the coastal zone shall provide underground utilities and the under-grounding of existing overhead utilities shall be considered high priority.*

Action

- *The City will work with the utility companies to hasten the under-grounding of utilities in the coastal zone.*

The "Waterfront Area Aesthetic Criteria for New Development Assessment" (Appendix A) were developed to assist in assessing the impacts of new development. The WAAC include criteria for evaluating the appropriate intensity of development for the Waterfront Area. Projects are evaluated based on their effect on openness, lack of congestion, naturalness, and rhythm. With regards to naturalness, the WAAC state, "Views to the foothills and mountains are still largely unimpeded by structures; in particular, the views from Stearn's Wharf, Chase Palm Park, and East Beach offer unparalleled beauty." The WAAC criteria for upholding naturalness include the following:

Views *Views are the most important dimension of naturalness. These views are to the ocean, other points along the Waterfront, and to the foothills and mountains. The contrast between the sweep of the coastline and the sweep of the mountains is especially dramatic and heightened by the linear elements of Chase Palm Park and Cabrillo Boulevard.*

Waterfront Area Design Guidelines (WADG) (Appendix B) were developed and are utilized in review of projects by both the Architectural Board of Review (ABR) and the Historic Landmarks Commission (HLC). The WADG include both area wide guidelines and guidelines for specific zone districts. The area-wide guidelines contain provisions for landscaping, views/viewsheds, El Pueblo Viejo – Landmarks District,

3.4 GENERAL PLAN

The City's General Plan is comprised of nine elements, including the seven elements mandated by State Planning law. The seven required elements include the Land Use, Housing, Circulation, Noise, Conservation, Open Space, and Seismic Safety/Safety elements. The remaining elements of the City's General Plan are the Scenic Highways Element and the Parks and Recreation Element. As a whole, the City's General Plan contains a number of goals and policies that relate to visual resource protection and are applicable to the Entrada project.

Conservation Element

The City's Conservation Element is "intended to serve as the City's official policy guide in public and private development matters related to the preservation and enhancement of natural resources." The goals and policies that are relevant to the proposed project are discussed below.

Goals – Visual Resources

- Restore where feasible, maintain, enhance and manage the creekside environments within the City as visual amenities, where consistent with sound flood control management and soil conservation techniques.
- 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.

Visual Resources Policies:

Policy 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.*

Implementation Strategies:

3.1 *In the absence of Local Coastal Program policies, develop a design overlay zone to limit building heights.*

3.2 *The northerly side of Cabrillo Boulevard from Castillo Street to Las Patos Way should be designated a special design review district. Restrictions should be developed for this district which establish setbacks and height limitations formulated to ensure the preservation of views and view corridors from the beach toward the mountains.*

3.3 *When the Local Coastal Program is finalized, this element should be revised, as needed, to preserve and enhance the harbor, shoreline, and other coastal resources.*

Conservation Element Text Discussion:

The Conservation Element includes the following discussion regarding visual resources in the Entrada project area:

> *The shoreline, harbor, and waterfront areas are key aesthetic assets which provide diverse recreational opportunities and passive enjoyment of the sea, sand, and scenic views. From the beaches, views of the ocean and the islands, with sailboats*

Route 225) was deleted from the State Highway system and its ownership was transferred to the City of Santa Barbara. However, the City still considers Cabrillo Boulevard to be an important scenic route that should remain subject to the design standards and controls outlined in the Scenic Highways Element.

The Scenic Highway Element states (Part):

> Along with other points of interest in the City, Cabrillo Boulevard is a major tourist attraction and should be preserved for visitors and residents as an urban scenic highway.
>
> Land use regulations consistent with the policies of the General Plan should be in effect over the entire corridor...

The Scenic Highways Element states that height-setback relationships should be created so that future development does not obstruct views of scenic resources. In addition to setbacks, the Element recommends that building separations be required to provide significant open spaces and to control the intensity of development.

Discussion: The design standards and controls outlined in the Scenic Highways Element pertain to Cabrillo Boulevard itself and existing and future development located along Cabrillo Boulevard. The project site is not located on Cabrillo Boulevard. The closest portions of the Entrada project to Cabrillo Boulevard are Sites A and B, approximately 250 feet north of the north side of Cabrillo Boulevard. The Entrada project would not result in any obstacles to obtaining any of the goals outlined in the Scenic Highways Element for Cabrillo Boulevard. **In approving the Entrada project, both the Planning Commission and City Council found the Entrada project consistent with the Scenic Highways Element.**

3.5 DOWNTOWN/WATERFRONT SANTA BARBARA, *A TRADITION IN PROGRESS*, FINAL REPORT AND RECOMMENDATIONS

Downtown/Waterfront Santa Barbara, *A Tradition in Progress*, Final Report and Recommendations (accepted by the City Council on February 10, 1998) is the end product of a several-month process, involving more than one hundred community members that met to discuss issues considered vital to the economic, social, and environmental well being of the City over the next 20 years. The Visioning Report consists of Themes, Action Steps, and Implementation Options. In accepting the Visioning Report, the City Council directed that the Visioning Report be considered during the review and consideration of future projects. One Theme and its accompanying Action Steps and Implementation Options contained in the Visioning Report is relevant to public views, as follows:

Theme IA *Maintain the beautiful vistas and sweeping views of the ocean and mountains.*

developed for the Waterfront/Downtown area. However, as presented in the Public View Analysis Chapter of this EIR, the Local Coastal Plan—Visual Resources Map was considered and important public scenic views and view corridors which could potentially be affected by the Entrada project have been identified and the Entrada project's potential effect on the identified important public scenic views and view corridors assessed. The analysis concludes that the Entrada project is not anticipated to result in significant effects to important public scenic views or view corridors.

Relative to Action Step 3 and its Implementing Option, please refer above to the Conservation Element Discussion.

Relative to the overall Theme IA, from the beach and most of Cabrillo Boulevard viewpoint locations, the Entrada project does not block views or view corridors of the foothills and Santa Ynez Mountains, nor are any views of the ocean blocked. However, as a viewer begins to proceed north along State Street closer to the Entrada project site, views and view corridors to the foothills and Santa Ynez Mountains become progressively more limited. View corridors to the ocean from points along lower State Street are limited by existing development and are only available by looking directly down State Street. The Entrada project will not significantly affect views to the ocean. During the review of the project, the Planning Commission and Historic Landmarks Commission determined that some foothill and Santa Ynez Mountains views and view corridors could be lost if specific view corridors that "framed" the Santa Ynez Mountains and foothills were preserved. The Entrada project includes view corridors through Sites B and C which "frame" the Santa Ynez Mountains and foothills. **In previously approving the Entrada project, the Planning Commission and City Council found the Entrada project consistent with the Visioning Report, Theme IA, and its applicable Action Steps and Implementing Options.**

4.0 PUBLIC VIEW ANALYSIS

This section describes the existing visual resources and views experienced from public places within the vicinity of the Entrada project. It provides criteria for identifying important public scenic views and project impact significance criteria. It also analyzes the impacts to important public scenic views potentially affected by the implementation of the Entrada project.

This discussion uses several related, but slightly different terms:

- *Views*. Anything that can be seen.
- *Public views*. Views experienced from public places.
- *Visual resources*. Items (such as natural features, trees, landscaping, or buildings) within a view.
- *Important visual resources*. Items within a view deemed important as described in sections 4.2 and 4.3.
- *View corridor*. A view almost completely framed on both sides by existing development (including landscaping), large enough to provide a sense of contrast between the urban area in the foreground and important visual resources in the background.
- *Important public scenic views*. Public views that contain important visual resources, have scenic qualities, and are visible from heavily visited viewing areas (further described in section 4.3.1). Important public scenic views include view corridors containing important visual resources, with scenic qualities, from heavily visited viewing areas.
- *Viewpoint*. The vantage point or location from which a view is experienced.
- *Visual context*. The visual resources that are associated with and comprise a particular physical setting. The visual context changes from one location to another. The basis of the visual context stems from both the existing physical setting and the aesthetic expectations as described in existing plans and policies.

4.1 EXISTING SETTING

The existing setting discussion describes existing visual resources and views experienced from public places in the Entrada project vicinity. This discussion is limited to views and visual resources that can be experienced from public areas since impacts to views from private settings are not subject to CEQA consideration, and private view concerns are not addressed in the City of Santa Barbara's relevant General Plan and Local Coastal Plan policies.

4.1.1 Regional Existing Setting

This section provides an overview of the visual resources and views experienced from public places that characterize the project vicinity. This region includes the Waterfront to the south, and extends northward to the background of the Santa Ynez Mountains.

The City of Santa Barbara is situated between the Santa Ynez Mountains to the north, the Santa Barbara Mesa landform to

Looking north at Santa Barbara's waterfront from City Harbor breakwater

Figure 4-1. Waterfront Area

Looking northeast toward Andre Clark Bird Refuge from Cabrillo Boulevard

Looking north from Sycamore Creek pedestrian bridge at Cabrillo Boulevard

Figure 4-2. Waterfront Area Near East Beach

Looking northeast from Cabrillo Boulevard near Calle Cesar Chavez

Looking east along Cabrillo Boulevard bikepath near Stearn's Wharf

Figure 4-3. Waterfront Area Near Chase Palm Park

Santa Ynez Mountain ridgelines are generally visible from Cabrillo Boulevard and East Beach, most of the foothills are blocked from view by existing residential and visitor serving commercial structures. These views are characteristic of the intermittent mountain views experienced throughout the downtown Santa Barbara vicinity. The Santa Ynez Mountains and ridgeline are generally visible by pedestrians, park visitors, and beach visitors while walking, running, or bicycling throughout the Waterfront area east of State Street, with existing development blocking only the lower elevations of the Santa Ynez Mountain range. ~~Stearn's~~Stearns Wharf provides abundant, unobstructed, sweeping views of the Santa Ynez Mountains and foothills. People traveling in vehicles have less opportunity to enjoy extended views of the Santa Ynez Mountains, as views experienced at vehicular speeds over 25 miles per hour on Cabrillo Boulevard are limited to park areas and wide intersections (i.e, Cabrillo Boulevard intersections at Calle Cesar Chavez and Garden Street).

Ocean views are abundant and are experienced by pedestrians, hotel patrons, vehicle passengers, and recreationalists along Cabrillo Boulevard. In addition, ocean, park, and beach views are abundant from many viewpoints on ~~Stearn's~~Stearns Wharf. The thoroughfare is bordered by distinctive rows of parallel mature palms. There are many beaches, public facilities, and parks that provide open space along this portion of the Waterfront, including the Andre Clark Bird Refuge, Zoological Gardens, East Beach, and Chase Palm Park. Ocean, beach, and park views are generally intact, with few development intrusions except for a few recreational facilities (bathrooms, showers, drinking fountains). The ocean, parks, and beaches attract many users; they serve as general recreation areas, but are also areas where large community festivals are held (such as art shows). They are also the staging areas for athletic events such as races and charitable events. Ocean, park, and beach views are experienced by pedestrians and auto travelers alike.

Views of ~~Stearn's~~Stearns Wharf, considered both a distinctive historic and cultural resource and an important tourist attraction, are only moderately abundant in public areas of the eastern Waterfront area. Views of ~~Stearn's~~Stearns Wharf can be experienced only as glimpses from vehicles, and only from those hotels and residential areas close to State Street. However, beach and trail users can generally view the wharf from along the Waterfront. The natural surroundings play a part in the structure's popularity; the wharf is a place where one can experience unobstructed views of the city, the Santa Ynez Mountains, the ocean, and beach.

4.1.1.2 Western Waterfront Area

Existing land uses in the Waterfront area west of State Street are less varied when compared to the eastern Waterfront area. This area is characterized by the City harbor, marina, and small hotels and motels with shallow setbacks along Cabrillo Boulevard (Figures 4-4 and 4-5). Views from this area primarily extend out over the water. Mountain views are less abundant in this area of the Waterfront, as Santa Ynez Mountains can be generally seen only to the east; views of the foothills are obstructed by existing development. Santa Ynez Mountain views are generally natural and intact, and are most easily seen by pedestrians and recreationalists. People travelling by vehicle experience views of the mountains when heading eastward.

Coastal bluffs are visible to the north of Cabrillo Boulevard in a portion of the western Waterfront area near Santa Barbara City College. The bluffs mark the southern extent of the Mesa area of Santa Barbara, an elevated landform rising several

hundred feet above the City center. The visual quality of most of the bluffs has been degraded by development and contouring. The bluffs in the Western Waterfront area, however, west of the Loma Alta/Cabrillo Boulevard intersection, are relatively natural. The draw associated with these bluffs stems from their relatively intact quality, and remind the viewer of the impressive topographic relief associated with the Mesa landform. Pedestrians, beach and marina users can see the bluffs relatively easily, though views are obstructed by development and parking lots along Cabrillo Boulevard east of Loma Alta. Vehicle passengers can view coastal bluffs from limited areas such as large open space areas and wide intersections.

Ocean and beach views are experienced along Cabrillo Boulevard by pedestrians, vehicle travelers, hotel patrons, and recreationalists. Ocean views in the western Waterfront area are less intact than those of the eastern Waterfront area. The City harbor and marina, including parking lots and supporting recreational facilities (i.e., bathrooms, showers, drinking fountains, and shops), all interrupt ocean views. Like the eastern Waterfront area, this area is also bordered by distinctive rows of parallel mature palms along Cabrillo Boulevard. The ocean and beaches, though less abundant than in the eastern Waterfront area, are a large draw to the public; they serve as general recreation areas, but are also locations where large community festivals and charitable events are held.

Besides the ocean and beach area, there is little other open space in the western Waterfront area, with the exception of Plaza Del Mar/Pershing Park. The Plaza Del Mar portion of the park is a transition to the Mesa area and the edge of Santa Barbara City College. It is used periodically for art shows and outdoor concerts, but is primarily a passive recreational use area.

4.1.1.3 Lower State Street

Lower State Street is characterized by visitor-serving uses, such as restaurants, cafés, recreational equipment sales and rental, and small retail shops (please refer to Figure 4-6). With the exception of the Californian Hotel and a three-story structure, most of the buildings are one- to two- stories tall. At least half of the land area of the properties fronting on State Street are either in surface parking lots or are unimproved as a result of the former use of this area for automobile sales and related light industrial uses. These small parking lots now provide open space and add to the overall open feeling experienced by people on foot. The open space also provides opportunities for experiencing mountain and foothill views. Santa Ynez Mountain views are visible to the east as intermittent glimpses between buildings and particularly along intersections. Santa Ynez Mountain views can be experienced more continuously when facing southeast. Eastern mountain views are interrupted by utility lines, while southeastern views are more intact. Despite the development of lower State Street, views of the Santa Ynez Mountains from many viewpoints along the street and sidewalks are abundant such that the viewer can generally discern the ridgeline, and the overall mountain topography. The businesses found along lower State Street, such as clothing stores, recreational equipment rentals, hotels, and restaurants, promote a resort-like atmosphere, which benefits from a scenic natural background. Santa Ynez Mountain views are easily seen by pedestrians and other persons on the sidewalks (i.e, café patrons, and persons waiting at the Railroad Depot). People travelling in vehicles have less opportunity to experience mountain views due to their faster rate of travel and their lower vantage-point but can see such views at wide intersections.

Looking north along Stearn's Wharf toward lower State Street

Looking south on State Street from pedestrian crossing at Yanonali Street

Figure 4-4. Lower State Street and Stearn's Wharf

Looking west along
Cabrillo Boulevard
from Dolphin Fountain
at Stearn's Wharf

Looking north from
City Harbor toward
Santa Barbara City College

Figure 4-5. Waterfront Area West of Stearn's Wharf

Figure 4-6. Lower State Street

The ocean and shoreline cannot be seen from most of lower State Street, as views to the south are generally obscured by ~~Stearn's~~Stearns Wharf and traffic along Cabrillo Boulevard. ~~Stearn's~~Stearns Wharf itself can only be seen when looking directly south on State Street.

4.2 EXISTING PUBLIC VIEW PLANS AND POLICIES

Policies for the protection of important public scenic views are included in a number of existing State and City planning documents, including:

4.2.1 California Coastal Act

The California Coastal Act (California Public Resources Code §§30000 et seq, enacted by the State Legislature in 1976) includes the following policy which addresses view protection within coastal areas.

Section 30251:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreations and by local government shall be subordinate to the character of its setting.

4.2.2 Local Coastal Plan (LCP) (adopted by the City Council in May, 1981):

- LCP Policy 9.1: *The existing views to, from, and along the ocean and scenic coastal areas shall be protected, preserved, and enhanced.*
- LCP Policy 9.3: *All new development in the Coastal Zone shall provide underground utilities and the under grounding of existing overhead utilities shall be considered high priority.*
- LCP—Visual Resources Map: The definitive cataloging of visual resources is represented by the map titled "Local Coastal Plan—Visual Resources" which accompanies the LCP. The map identifies view potential from various points along the main transportation corridors within the coastal zone and assigns a rating to views as being desirable, undesirable, or neutral. A copy of the LCP—Visual Resources Map is included as Appendix C.[1]

The LCP also includes a discussion on positive and negative view elements. Positive view elements are listed as the Santa Ynez Mountains, foothills, ocean, lagoon, and plant materials, significant buildings, harbors, and boulevards. Negative view elements include utility lines, poorly maintained buildings, littered creeks, and utility poles.

---

[1] The LCP—Visual Resources Map establishes view potential in two distinct ways: (1) "foreground" views, i.e., those views within a 300- foot radius within a certain corridor ("a cone of view"); and (2) "background" views, i.e., those views within a certain corridor looking to the horizon. Each point is represented by two concentric circles, with the inner circle showing the extent of the recognized foreground view, and the outer circle the background view, if any.

4.2.3 General Plan Element Conservation (adopted by the City Council August, 1979):

- Policy 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.*

4.2.4 Waterfront Area Design Guidelines

The Waterfront Area Design Guidelines (certified by the California Coastal Commission November 12, 1986), which were developed and which are utilized by the city's Architectural Board of Review (ARB) and the Historic Landmarks Commission (HLC), also provide guidance on what constitutes a "scenic resource." For implementation of Local Coastal Plan Policy 9.1, the Guidelines state that the vistas of the ocean, harbor, and mountains from Cabrillo Boulevard, State Street, Castillo Street, and Garden Street, must be carefully considered, maintained and where feasible, enhanced.

4.2.5 Local Coastal Plan Waterfront Area Aesthetic Criteria for New Development Assessment

The Local Coastal Plan Waterfront Area Aesthetic Criteria for New Development Assessment (certified by the California Coastal Commission November 12, 1986). These criteria have been established to evaluate the appropriate intensity for potential development based on existing visual resources.

4.2.6 Visioning Report Theme 1A

- Theme IA: Maintain the beautiful vistas and sweeping views of the ocean and mountains.

4.3 ANALYTIC METHODOLOGY

The evaluation of project impacts on public views is a two-step process:

- Assessing the importance of public views in the project vicinity, and
- Assessing the significance of project changes to important public scenic views.

4.3.1 Step One: Assessing the Importance of Public Views/View Corridors

The importance of a public view is determined by three interrelated criteria, as follows:

- The view/view corridor includes one or more important visual resources; and
- The view/view corridor has scenic quality; and
- The view/view corridor is experienced from a heavily visited public viewpoint.

The three criteria which define important public scenic views are further explained below.

4.3.1.1 The View/View Corridor Includes One or More Important Visual Resources

In general, for the Waterfront area of Santa Barbara, important visual resources are identified in City policies to include:

- Santa Ynez Mountains (foothills and ridge lines);
- Shoreline (ocean, beach, harbor);

- Open space areas (natural or landscaped); and
- Historic buildings.

Views/view corridors specifically identified as important by adopted City or state plans, policies or regulations, include the following:

- Desirable views as identified on the Local Coastal Program Visual Resources Map (Appendix C);
- Views from ~~Stearn's~~Stearns Wharf, Chase Palm Park, and East Beach;
- The contrast between the sweeping views of the coastline and the sweeping views of the Santa Ynez Mountains; and
- Views/view corridors of the ocean, harbor, and Santa Ynez Mountains from State Street, Garden Street, Cabrillo Boulevard, and Castillo Street.

4.3.1.2 *The View/View Corridor Has Scenic Qualities*

The following are variables that have been previously identified by national planning organizations (i.e., National Scenic Highway Program and the American Planning Association) and in City policies for use in describing view qualities:

- *Magnitude.* How expressive or abundant is the view? Is the view continuous throughout several view corridors (e.g., the ridge line of the Santa Ynez Mountains)?
- *Intactness.* To what extent has the natural view been disturbed or compromised (e.g., hillside scarring from grading)? Are there constructed materials that impose an artificial view into the backdrop of the natural setting, such as existing structures, overhead utilities, telephone poles, etc.?
- *Distinctiveness.* How unique or representative of the region is the view?

4.3.1.3 *The View/View Corridor is Experienced From a Heavily Visited Public Viewpoint*

In general, the importance of a view/view corridor is heightened when it is more accessible by virtue of its location or association with a heavily visited public area. Public viewing locations are those which have a large number of viewers and a considerable duration of view, and it may include the following:

- Public Gathering Area (parks, visitor or tourist center)
- Major Public Transportation Corridor
- Areas of Extensive Pedestrian/Bicycle Use

4.3.2 Step Two: Project Impact Analysis

Once important public scenic views and important public view corridors have been identified in the project area, the effect of the proposed project on these views/view corridors is analyzed. This section describes criteria for determining the significance level of impacts to important public scenic views and view corridors.

4.3.2.1 *Impact Significance Criteria*

The proposed project would represent a significant adverse impact to an important public scenic view if it would:

- Conflict with the applicable vista protection standards, scenic resource protection requirements, or design criteria of the City, or if it would alter or obstruct existing public viewsheds from or across the project site, including scenic features associated with designated scenic highways[2], by:
  - Substantially degrading an important public scenic view;
  - Substantially blocking an important public scenic view corridor; or
  - Substantially impairing the visual context[3] of the Waterfront area.

4.4 PROJECT SETTING AND IMPACT ANALYSIS

4.4.1 Photographic Simulations and View Angle Analysis

Photographic Simulations

View impact assessment can be conducted using a variety of tools. These tools can include the use of videos, photographs, and computer generated photo simulations, and field visits to the site with and without the installation of story poles located to indicate the project's structural height or mass. The following assessment and impact analysis was conducted using photographs of the existing condition and photo simulations of the project. The photographs and photo simulations were supplemented with field visits to the site and vicinity without the use of story poles. The assessment and impact analysis included in this EIR did not rely on video simulations.

Analysis relying upon still photographs and photo simulations has limitations. A still photograph is a "snapshot" of a view and represents an isolated view that a viewer would observe if looking through a long narrow tube. A still photograph can replicate the approximately 70 degree field of view experienced by a person, and even their 120 degree peripheral field of vision, by stitching together adjacent photographs to provide a panorama view. Such a photograph and simulation cannot completely, however, represent the human viewing experience in which the viewer's eyes encompass a broad field of view and typically roam from one location or "view" to another, thereby taking in and experiencing numerous views from any one particular location. A still photograph represents only one isolated view that a viewer would take in and experience from a particular location. Nonetheless, even with the limitations outlined above, still photographs and photo simulations are a useful tool that provide a representation of a view and the effects a project would have on the human viewing experience. Appendix D is a detailed explanation of the methodology used in the EIR photo simulations and the relevance of this technique in representing a realistic visual experience for use in this document. It also discusses the limitations inherent in the methodology.

In order to assess public views at the Entrada project site and the immediate vicinity, photographs were taken from 19 different viewpoints selected by City Community

---

2 The use of "designated scenic highway" in this context would include both official formal designations (such as a State Scenic Highway) and informal local designations through local planning documents and policy statements, such as is the case for Santa Barbara's Cabrillo Boulevard.

3 The term *visual context* refers to the visual resources which are associated with and comprise a particular physical setting. The visual context changes from one location to another and its roots can be found both in the existing physical setting and the expectations for the location as identified in existing plans and policies.

Source: Videoscapes August 2000

Figure 4-7. Viewpoint Locations

Development Department staff (Figure 4-7). The viewpoints were selected to be representative of general visual conditions in the Entrada project area and to achieve a totality of the human viewing experience within the project area to the extent current technology allows. The photographs are presented in the EIR in the way that a viewer might experience the project vicinity when generally traveling west along Cabrillo Boulevard and the Waterfront, and then proceeding northward up lower State Street to US 101. One photograph and simulation is also provided from a Riviera viewpoint looking down on the Downtown and Waterfront.

The viewpoints and photographs begin on the beach side of East Cabrillo Boulevard at its intersection with Helena Avenue, the most easterly point on East Cabrillo Boulevard from which the Entrada project would likely be visible. The next photographs are from viewpoints moving west along the beach side of Cabrillo Boulevard, to the most westerly point on West Cabrillo Boulevard from which the Entrada project would likely be visible. The photographs then reflect viewpoints along the western side of State Street, moving from the Waterfront up toward the central business district. The photographs conclude with viewpoints along Mason Street, Helena Avenue, US 101, and the Riviera. Obviously, a virtually infinite number of viewpoints are available for analysis; however, it is believed that the ones selected represent a reasonable, broad, and comprehensive selection from the vicinity of the project sufficient to analyze public view impacts. The location and direction from which these photographs have been taken is illustrated in Figure 4-7.

Layered onto these 19 photographs are different representations of the Entrada project. In Figures 4-8 through 4-26, these representations appear immediately underneath the "Existing Condition" photograph and include (in the following order):

- Proposed Condition without landscaping, transparently superimposed over the actual photograph. In this represen-tation, proposed project buildings are represented as nearly transparent, to emphasize any existing views that would be blocked by the project.
- Proposed Condition without major landscaping elements. In this representation the project buildings are represented in a solid form; and
- Proposed Condition with landscaping. In this representa-tion the project buildings and mature landscaping (at 15 years) are represented in a solid form.

These project representations were created using computer simulations. Computer models were made of existing buildings and proposed buildings. The model was calibrated to ensure correct placement of the proposed buildings by aligning the existing buildings of the model with the existing buildings in the existing condition photograph. Once calibrated, the "layer" showing the modeled existing buildings was "turned off," leaving the existing setting photograph with the proposed buildings layered on top. Additional details on the visual simulation methodology, including its limitations, are provided in Appendix D.

View Angle Analysis

In April of 1999, Penfield and Smith Engineers analyzed and documented the view sightlines to the Santa Ynez Mountains from the Entrada project site. This View Angle Analysis determined that view angles from the Entrada project site to the mountains varied from 2.3 to 7.8 degrees above horizontal. The major finding of the analysis was that any structure on the east side of State Street that is equal to or taller than a view angle of 7.8 degrees would entirely block views of the Santa

Ynez Mountains as experienced from a viewpoint directly across the street ~~from~~ on the southwest sidewalk of State Street. With a 20-foot setback from the property line fronting State Street, this means that any structure more than 16 feet 8 inches in height would block Santa Ynez Mountain views as seen from the adjacent southwest sidewalk of State Street. A typical one-story structure in Santa Barbara is 16- to 18-feet tall; thus even a one-story building placed at the Entrada project site would block Santa Ynez Mountain views. This is demonstrated today by the blockage resulting from the existing one-story building on the Entrada project site (the "Hot Spots" building). Additional details of the view angle analysis are provided in Appendix E.

The environmental setting and impact analysis for each of the 19 views are presented below. They are grouped by their respective areas:

- Waterfront, Views 1 through 4 (Figures 4-8 through 4-11)
- Lower State Street, Views 5 through 14 (Figures 4-12 through 4-21)
- Mission Creek, Views 15 and 16 (Figures 4-22 and 4-23).
- Helena Avenue, View 17 (Figure 4-24)
- Highway 101, View 18 (Figure 4-25)
- Riviera, View 19 (Figure 4-26)

This page intentionally left blank.

4.4.2 View 1: Looking Across Keepers Restaurant from South Side of Cabrillo Boulevard

Location Description

View 1 (Figure 4-8) is taken from the south side of Cabrillo Boulevard at its intersection with Helena Avenue along the Waterfront. The photograph is angled slightly to the northwest, so that the center of the photograph is focused on the Entrada project site seen by looking beyond the Keepers Lighthouse Restaurant building.

Importance of Existing Visual Resources and Public Views

The LCP—Visual Resources Map does not include a foreground view from this particular location. The background view rating from adjacent "cones of view" indicate that background views are minimal and are undesirable. This rating is most likely a result of buildings located on the north side of Cabrillo Boulevard that block a large portion of the view to the Santa Ynez Mountains, although portions of the Santa Ynez Mountain ridgeline are visible between buildings and landscaping. The foothills are not visible, so the view has no visual magnitude. Many overhead utility lines are also visible in the existing photograph, degrading what natural landforms are evident, such that the visual quality is not intact. Except for views of the Keeper Restaurant lighthouse, the location is not visually distinctive.

This viewpoint location is heavily visited by pedestrians, bicyclists, and vehicles along Cabrillo Boulevard. However, typically very few people, either on foot, bicycle, or in a vehicle, would travel directly up Helena Avenue from Cabrillo Boulevard. Most viewers would be traveling east or west on Cabrillo Boulevard along the Waterfront. The view in this photograph would not be the dominant view from this location along the Waterfront.

Therefore, although the viewpoint location of View 1 is a heavily visited area on a local scenic highway, View 1 is not an important public scenic view, as it does not include important visual resources and does not have scenic quality.

Project Impact Assessment

View 1 is a less than important public scenic view. Therefore, the development of the Entrada project would not impact an important public scenic view or view corridor, nor would the project substantially impair the visual context of the Waterfront area. The Entrada project would result in the removal of overhead utility lines, a beneficial impact on public views.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-8. View 1: Looking Across Keepers Restaurant from South Side of Cabrillo Boulevard

This page intentionally left blank.

4.4.3 View 2: Looking Up State Street From Dolphin Fountain

Location Description

View 2 (Figure 4-9) is taken from the south side of Cabrillo Boulevard at the intersection with State Street and the terminus of ~~Stearn's~~Stearns Wharf, in the heart of the Waterfront. The view is centered on the eastern side of lower State Street, and includes the frontage of Entrada project areas B and C.

Importance of Existing Visual Resources and Public Views

The view includes important visual resources. The LCP—Visual Resources Map does not include a foreground view from this viewpoint location, but this viewpoint is specified as a desirable background view. City visual resource policies indicate that sweeping views of the Santa Ynez Mountains from locations in the Waterfront (Chase Palm Park, ~~Stearn's~~Stearns Wharf, Cabrillo Boulevard, etc) have a heightened importance and that views of the Santa Ynez Mountains from State Street, Garden Street, Castillo Street, and Cabrillo Boulevard are also important. The photograph includes views of the Santa Ynez mountains from Cabrillo Boulevard.

The view has scenic quality. Large expanses of the Santa Ynez Mountains are generally visible to the north, so it has extensive visual magnitude. From this viewpoint, the ridgeline of the Santa Ynez Mountains are nearly continuous, interrupted only by street palm trees and a lamp post. The existing view of the Santa Ynez Mountains is blocked in part by primarily single-story structures and telephone poles. The view has a moderate amount of integrity. Based on its viewpoint location at the foot of the Dolphin Fountain, the view has a high degree of distinctiveness. A viewer at this location can with a slight turn of the head to the east or west experience other sweeping expanses of Waterfront visual resource elements, including the shoreline, beaches, the Harbor, and ~~Stearn's~~Stearns Wharf.

The viewpoint is a heavily visited public location. The viewpoint location is extensively visited, and these viewers could experience these views for a long period of time. This viewpoint is along Cabrillo Boulevard, the Wharf, pedestrian/bike trails, and adjacent to beach areas, all of which are public areas. This view is the predominant view for pedestrians and vehicles traveling north on ~~Stearn's~~Stearns Wharf. This photographic location is also one where pedestrians linger before crossing either State or Cabrillo streets, and is the loading point for the Downtown-Waterfront electric shuttle.

Therefore, View 2 is an important public scenic view as it includes important visual resources, has scenic quality, and is from a heavily visited public viewpoint.

Project Impact Assessment

The Entrada project would be visible in View 2. Some views of the Santa Ynez Mountain ridgeline are blocked by third-story structural elements, although views of the ridgeline are maintained directly to the north and northeast. The project view obstruction, however, would be in a portion of the scenic view that presently is interrupted by existing structures, street palm trees, and a street light. With Entrada project development, a relatively small portion of the mountain ridgeline would be lost in the view, and the viewer would still experience a sweeping expanse of the Waterfront and Santa Ynez Mountains with a slight change in orientation to the east and south. To the west are unobstructed views of the Harbor.

While the Entrada project would adversely affect an important public scenic view as experienced in View 2, the intrusion would be limited to an area where views are already interrupted. **Therefore, the Entrada project would not substantially degrade the important public scenic view as experienced in View 2. Observers at this viewpoint currently have views of a transitional area between the ~~Stearn's~~Stearns Wharf area and central business district along an urban corridor. The proposed development within this corridor would be consistent with this visual expectation. This would be a less than significant impact on an important public scenic view.**

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-9. View 2: Looking Up State Street from Dolphin Fountain

This page intentionally left blank.

4.4.4 View 3: Looking Toward Area B From Southwest Corner of State Street and Cabrillo Boulevard

Location Description

View 3 (Figure 4-10) is taken from the south side of Cabrillo Boulevard from the southwest corner of the intersection with State Street, along the Waterfront. The photograph is angled to the northeast so that the center of the photograph is focused on the Entrada project site looking past the Harbor View Inn and Eladios Restaurant (28 W. Cabrillo/1 State Street).

Importance of Existing Visual Resources and Public Views

The view includes important visual resources. The LCP—Visual Resources Map includes this location as having a desirable background. City visual resource policies indicate that sweeping views of the Santa Ynez Mountains from locations in the Waterfront (Chase Palm Park, ~~Stearn's~~Stearns Wharf, Cabrillo Boulevard, etc) have a heightened importance, and that views of the Santa Ynez Mountains from State Street, Garden Street, and Castillo Street, are also important. Large expanses of the Santa Ynez Mountains are generally visible to the northeast.

View 3 has moderate scenic quality. In this view, the ridgeline of the Santa Ynez Mountains is disrupted on the west by development along State Street and street lights. The mountain expanse is further blocked by development on the east side of State Street and telephone poles. Like View 2, a viewer at this location can, with a slight turn of the head to the east, experience other sweeping expanses of Waterfront visual resources including the shoreline, beaches, and ~~Stearn's~~Stearns Wharf. In addition, from this viewpoint, orientation to the south and west afford views of the ocean and harbor.

The viewpoint is a heavily visited public location along Cabrillo Boulevard, at a public bench at the foot of ~~Stearn's~~Stearns Wharf and the Dolphin Fountain. It is visited by an extensive number of viewers on foot traveling from lower State Street to ~~Stearn's~~Stearns Wharf and along Cabrillo Boulevard adjacent to West Beach, all of which are public areas. These visitors can experience these views for extended periods.

Therefore, View 3 is an important public scenic view as it includes important visual resources, has scenic quality, and is a heavily visited public viewpoint.

Project Impact Assessment

The Entrada project would not be prominent in View 3, as it generally would blend in with other existing urban development on the east side of State Street and would be seen from an oblique angle. Proposed palm trees could block a small portion of the lower elevations of the Santa Ynez Mountains, but views of the ridgeline from this location would remain generally intact. In time, the palm fronds could extend even higher, minimizing the ridgeline blockage. With Entrada project development, a relatively small portion of the mountain ridgeline would be lost in View 3, but the viewer could still experience a sweeping expanse of the Waterfront and Santa Ynez Mountains with a slight change in orientation to the east, south, or southwest.

While the project would adversely affect an important public scenic view as experienced in View 3, the intrusion would be limited in extent and would occur in an area where views are already interrupted. **Therefore, the project would have a negligible effect on the important public scenic view depicted in View 3. Observers at this viewpoint currently have views of a transitional area between the Waterfront area and central business district at the start of the urban corridor. The proposed development within this corridor would be consistent with this visual expectation. This would be a less than significant impact on an important public scenic view.**

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-10. View 3: Looking Towards Area B from Southwest Corner of State Street and Cabrillo Boulevard

This page intentionally left blank.

4.4.5 View 4: Looking Across Harbor View Inn/Eladios Property From South Side of Cabrillo Boulevard

Location Description

View 4 (Figure 4-11) is taken from the south side of Cabrillo Boulevard north across the Harbor View Inn/Eladios Restaurant building (28 W. Cabrillo/1 State Street) along the Waterfront. The view is angled slightly northeast to encompass both proposed project Areas A and B.

Importance of Existing Visual Resources and Public Views

The view includes important visual resources. The LCP—Visual Resources Map includes this viewpoint location as having a desirable background, likely due to the presence of the Santa Ynez Mountains to the east. City visual resource policies indicate that sweeping views of the Santa Ynez Mountains from locations in the Waterfront (Chase Palm Park, ~~Stearn's~~Stearns Wharf, Cabrillo Boulevard, etc.) have a heightened importance and that views of the Santa Ynez Mountains from State Street, Garden Street, and Castillo Street, are also important. A portion of the Santa Ynez Mountains is visible in View 4.

The view has moderate scenic quality. From this viewpoint only a portion of the Santa Ynez Mountains are visible to the east. The Santa Ynez Mountain ridgeline is disrupted by existing development, primarily the Californian Hotel and Harbor View Inn. Other views of the Santa Ynez Mountains are obstructed by existing development on the east side of State Street, street trees, and street lights. Like Views 2 and 3, a viewer at this location can, with a slight turn of the head, experience other sweeping expanses of Waterfront and Santa Ynez Mountains.

The viewpoint is a heavily visited public location on a local scenic highway. It is visited by an extensive number of viewers on foot traveling along Cabrillo Boulevard adjacent to West Beach, which is a public area. These visitors can experience these views for extended periods.

Therefore, View 4 is a moderately important public scenic view as it includes important visual resources, has moderate scenic quality, and is a heavily visited public viewpoint.

Project Impact Assessment

The Entrada project would not be prominent in View 4. The project structural elements basically would replace the mass of the Californian Hotel on the west side of State Street (Area A). Development on the east side of State Street would barely be visible and would blend in with existing development at the corner of the street's intersection with Cabrillo Boulevard. The project would block a small portion of the lower elevations of the Santa Ynez Mountains, but the ridgeline would remain intact. With Entrada project development, no additional mountain ridgeline would be lost to view, and the viewer could still experience a sweeping expanse of the Waterfront and Santa Ynez Mountains with a slight change in orientation to the east.

While the Entrada project would adversely affect an important public scenic view as experienced in View 4, the intrusion would be extremely limited in extent. The Santa Ynez Mountain ridgeline would not be obstructed, and development would be visually consistent with adjacent existing development particularly in terms of height. **Therefore, the Entrada project would have a negligible effect on the important public scenic view in View 4. Observers at this viewpoint currently have views of a transitional area between the Waterfront area and central business district along its interface with an urban corridor. The proposed development within this corridor would be consistent with this visual expectation. This would be a less than significant impact on an important public scenic view.**

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-11. View 4: Looking Across Harbor View Inn/Eladio's Property from South Side of Cabrillo Boulevard

This page intentionally left blank.

4.4.6 View 5: Looking Toward Area B From Northwest Corner of State Street and Cabrillo Boulevard

Location Description

View 5 (Figure 4-12) is taken from the northwest corner of State Street and Cabrillo Boulevard, in the lower State Street area. The view is angled northeast to encompass proposed project Area B.

Importance of Existing Visual Resources and Public Views

The view includes important visual resources. A portion of this view is included on the LCP—Visual Resources Map as a desirable background, likely due to the presence of the Santa Ynez Mountains. City visual resource policies indicate that sweeping views of the Santa Ynez Mountains from locations in the Waterfront (Chase Palm Park, ~~Stearn's~~Stearns Wharf, Cabrillo Boulevard, etc) have a heightened importance and that views of the Santa Ynez Mountains from State Street, Garden Street, and Castillo Street, are also important. A portion of the Santa Ynez Mountains is visible in View 5.

View 5 has limited scenic quality of the Santa Ynez Mountains. The Santa Ynez Mountains and small glimpses of foothill areas are visible from this location, but the ridgeline is obstructed in several locations by existing development and street palm trees. Like Views 2, 3, and 4, a viewer at this location can, by looking to the east, experience other sweeping expanses of Waterfront visual resource elements, including the shoreline, beaches, and ~~Stearn's~~Stearns Wharf. The expansive view of the waterfront can be experienced from this viewpoint with an additional turn of the head (see Figure 4-12b).

Views from this viewpoint to elements associated with the Waterfront are abundant. The photograph viewpoint would be experienced by persons traveling from the Waterfront area up the west side of State Street, on the sidewalk toward the central business district. A person traveling in this direction at this viewpoint would be leaving the shoreline/Wharf area.

The views from this viewpoint as shown in View 5 are primarily toward to the Santa Ynez Mountains. If one looks to the east, views are of both the Santa Ynez Mountains and shoreline/ocean near Montecito, Summerland, and Carpinteria (see View 6a below). Visual resources associated with the Waterfront area such as ~~Stearn's~~Stearns Wharf, the shoreline, and the ocean can be seen from this location, depending on the viewer's position.

The viewpoint is a heavily visited public location. This viewpoint is located on lower State Street, adjacent to Cabrillo Boulevard and ~~Stearn's~~Stearns Wharf, all of which are public areas. However, viewers in this area are most likely moving or traveling between lower State Street commercial establishments and the Waterfront, as opposed to persons participating in Waterfront activities. As a result, the view is experienced only briefly.

Therefore, while View 5 is an important public scenic view, the quality of the **view from this location is not as valuable as similar views from other Waterfront viewpoints (Views Nos. 2-4). In particular, the view of the Santa Ynez Mountains and the shoreline that are representative of the views/view corridors specifically identified as important by adopted City plans including the contrast between the sweeping views of the coastline and the sweeping views of the Santa Ynez Mountains, can be viewed by turning to the east (as shown in View 6a below) and of ~~Stearn's~~Stearns Wharf by turning to the south and west are important. The view of the Santa Ynez Mountains ridgeline as shown in View 5 is less important, in that numerous intrusions (i.e., existing buildings on State Street, the Bekins Storage building, and existing palm trees) reduce the intactness of the existing view. The scenic quality is limited in several locations, and the viewpoint is heavily visited, but for brief durations.**

Project Impact Assessment

The Entrada project is prominently visible in View 5 and would obstruct most of the existing views of the Santa Ynez Mountains within this ~~shot~~photosimulation, and small glimpses of foothill areas as seen from this location north of Mission Creek. Some glimpses of the Santa Ynez Mountain ridgeline would remain. The Entrada project, however, is only a limited part of the broader overall panoramic view from this location. Important public scenic views of the Santa Ynez Mountains, shoreline, and ~~Stearn's~~Stearns Wharf from this viewpoint to the east that provide more abundant contrast between sweeping views of the coastline and the sweeping views of the Santa Ynez Mountains would not be affected.

View 5 is a good example of the limitations associated with "snapshot" views. If a viewer were looking through a long narrow tube and only saw the isolated view represented by View 5, it would be possible to conclude that the Entrada project could cause a significant adverse impact to this one particular important public scenic view. However, as stated in the introduction to this section, the human viewing experience is more than a snapshot or isolated field of view; a viewer's eyes roam from one location or view to another, taking in and experiencing a broader field of view consisting of numerous views from any one particular location. In this case, a viewer would simultaneously look at View 5 and the larger panoramic view encompassed to the to the east (as shown in View 6a below), with the larger panoramic view to the east having a higher degree of magnitude and intactness, and therefore being the more important and scenic view.

Therefore, the Entrada project would not substantially impact an important public scenic view. Views of the Santa Ynez Mountains that would be affected by the project have limited scenic quality. While the change resulting in some degradation and blockage of Santa Ynez Mountains within ~~to~~ this important public scenic view is adverse, it is a limited to natural views that are presently compromised by development. The impact would not be substantial, as ~~and not significant effect in that~~ the more important public scenic view from this location that provide more abundant contrast between sweeping views of the coastline and the sweeping views of the Santa Ynez Mountains would not be affected by the Entrada project. Observers at this viewpoint currently have views of lower State Street, a transition to the central business district along an urban corridor. The proposed development within this corridor would be consistent with this visual expectation. This would be a less than significant impact on important public scenic views.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-12. View 5: Looking Toward Area B from Northwest Corner of State Street and Cabrillo Boulevard

This page intentionally left blank.

4.4.7 View 6: Looking Toward Area B From West Side of State Street at Mission Creek Bridge

Location Description

View 6 (Figure 4-13) is taken from the west side of State Street at the Mission Creek bridge along lower State Street. The photograph is angled to the north so that the Entrada project Areas B and C are in the center of the photograph.

Importance of Existing Visual Resources and View

View 6 is not included as a visual resource per the LCP--Visual Resources Map. However, View 6 does include portions of Santa Ynez Mountains as seen from State Street, considered important visual resources per City policy.

The view includes scenic qualities, including abundant and somewhat intact views of the Santa Ynez Mountains ridgeline, and small glimpses of foothill areas. The view of the Santa Ynez Mountains from this lower State Street location is not unique or representative, as one does not experience sweeping expanses of Waterfront visual resource elements, including the shoreline, beaches, and Stearns Wharf. The expansive view of the waterfront can be experienced from this viewpoint. In order to provide a sense of the larger visual context, View 6a (Figure 4-13a) shows the view visible from the same viewpoint when looking directly across State Street to the northeast. In View 6a, the sweep of the Santa Ynez Mountains is evident, abundant, and intact as it slides into the ocean further to the east. -This panorama is similar to the views experienced in Views 2 through 5 by a slight reorientation toward the east.

The viewpoint is a heavily visited public location, though less visited than many of the viewpoints for Views 1 through 4 taken from Cabrillo Boulevard. The viewpoint location is visited by an extensive number of viewers due to its location on State Street, overlooking the Mission Creek bridge. The photograph viewpoint would be experienced by persons traveling from the Waterfront area up the west side of State Street, on the sidewalk, toward the Downtown. A person traveling in this direction, at this point, would be leaving the shoreline area. This viewpoint is on lower State Street and near Cabrillo Boulevard and ~~Stearn's~~Stearns Wharf, all of which are public areas. However, viewers in this area are most likely moving or traveling between lower State Street commercial establishments and the Waterfront, as opposed to persons participating in beach activities. As a result, the view is experienced for only a relatively short period of time.

Therefore, View 6 is an important public scenic view. While the quality of View 6 is not as valuable as views from other Waterfront locations (e.g., Views 2-4), it is nonetheless important. In particular, the view of the Santa Ynez Mountains and the shoreline as shown in View 6a is important. However, the view of the Santa Ynez Mountains ridgeline as shown in View 6 is less important in that numerous intrusions (i.e., existing buildings including Bekins Storage, and existing street palm trees) reduce the intactness of the view. View 6 of the Santa Ynez Mountains is not distinctive relative to View 6A experienced from the same location.

Project Impact Assessment

The project is prominently visible in View 6. The result is a loss of the mostly intact Santa Ynez Mountain ridgeline. The Entrada project, however, is only a limited part of the broader overall panoramic view of the Santa Ynez Mountains, as demonstrated in View 6a, the "Panoramic Contextual View."

Similar to View 5, View 6 is a good example of the limitations associated with "snapshot" views. If a viewer were looking through a long narrow tube and only saw the isolated view represented by View 6, it would be possible to conclude that the Entrada project could cause a significant adverse impact to this one particular important public scenic view. It is reasonable to assume, however, that a viewer would simultaneously look at Views 6 and 6a, with 6a having a higher degree of magnitude and intactness, and 6a being the more important and scenic view.

Views from this viewpoint location 6A to elements associated with the Waterfront are abundant. As stated previously, the photograph location would be experienced by persons traveling from the Waterfront area up the west side of State Street, on the sidewalk, toward the central business district. A person traveling in this direction, at this point, would be leaving the shoreline area.

The views from this location as shown in View 6 are primarily toward to the Santa Ynez Mountains, and both to the mountains and shoreline/ocean as shown in View 6a. Visual resources associated with the Waterfront area (such as ~~Stearn's~~Stearns Wharf, the shoreline, and the ocean) can all be seen from this location, depending on the viewer's orientation. These Waterfront visual resources would not be affected by the Entrada project in these views.

The Entrada project as shown in View 6 would affect an abundant~~the~~ view of the Santa Ynez Mountains ridgeline, although the intactness of the view has been compromised, and it is not distinctive. The change to this important public scenic view is not a significant effect in that the more important public scenic view from this location that provides more abundant contrast between sweeping views of the coastline and the sweeping views of the Santa Ynez Mountains as shown in View 6a would not be affected by the Entrada project. Observers at this viewpoint currently have views of lower State Street, a transition to the central business district along an urban corridor. The proposed development within this corridor would be consistent with this visual expectation. This is a less than significant impact on important public scenic views.

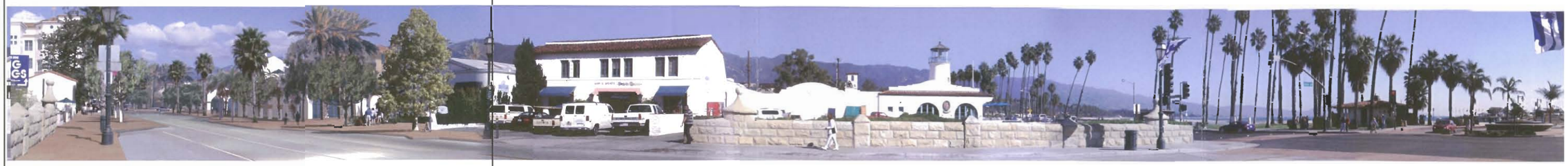
EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-13. View 6: Looking Toward Area B from West Side of State Street at Mission Creek Bridge



View 6: Proposed Condition

Figure 4-13a. View 6a: Panoramic Contextual View

This page intentionally left blank.

4.4.8 View 7: Looking Across State Street Through Area B Paseo

Location Description

View 7 (Figure 4-14) is taken from lower State Street south of Mason Street. The photograph is taken directly toward the Entrada project Area B.

Importance of Existing Visual Resources and Public Views

View 7 is framed by existing development and could be considered a view corridor. The corridor includes important visual resources. City policies indicate that view corridors with views of the mountains from State Street, such as seen in View 7, are important visual resources.

The view corridor has very limited scenic quality. Though the Santa Ynez Mountains are present in the view, their visibility is extremely limited such that the view is not abundant. The intactness of the view ~~and~~ is generally ~~degraded~~ disturbed and compromised by the presence of overhead utility lines and street lighting. Although a view corridor with mountain views, the view is not distinctive of views along lower State Street. Due to these ~~intrusions~~facts, the Santa Ynez Mountains in this view corridor are neither abundant, intact, nor distinctive.

The viewpoint is from a moderately visited public location. The viewpoint is along lower State Street, and therefore most viewers including pedestrians, bicyclists, and vehicles would be traveling between the Waterfront area toward the Downtown. There are no public gathering spaces where people would linger in this locale. As a result, the duration of the visitor's view is generally short and limited. The view in this photo would not be the dominant view along lower State Street.

Therefore, View 7 is only a moderately important public scenic view. The view has limited scenic quality due to substantial intrusions, only has moderate visitation, and is not the dominant view along lower State Street.

Project Impact Assessment

The Entrada project as shown in View 7 would adversely affect the very limited scenic quality of the Santa Ynez Mountain views as seen from State Street. As demonstrated by the View Angle Analysis (Appendix E), any structure over 16 feet 8 inches would block mountain views from this viewpoint location. However, the project would provide for a view corridor of the Santa Ynez Mountains ridgeline framed through a paseo in Area B. **Therefore, while the change to the moderately important public scenic view in View 7 would be adverse, it is not a significant effect in that a view corridor of the Santa Ynez Mountains experienced from State Street would be maintained. The remaining view through the paseo would be relatively intact, and would include the mountain ridgeline. Therefore, the Entrada project is not anticipated to substantially degrade, block, or impair an important public scenic view as experienced in View 7. Observers at this viewpoint currently have views of lower State Street, a transition to the central business district along an urban corridor. The proposed development within this corridor would be consistent with this visual expectation. Therefore the project would not substantially impair the visual context of the Waterfront, and ~~T~~this is a less than significant impact on an important public scenic view ~~on an important public scenic view~~. In addition, the Entrada project would have a beneficial impact by removing overhead utility lines intruding in the view corridor of the Santa Ynez Mountains as seen from this viewpoint.**

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-14. View 7: Looking Across State Street Through Area B Paseo

This page intentionally left blank.

4.4.9 View 8: Looking Through Area C From Entrance of Californian Hotel

Location Description

View 8* (Figure 4-15) is taken from the southwest corner of the intersection of State Street with Mason Street. The photograph is angled northeast toward Area C of the proposed project. The Proposed Condition without landscaping simulation has been revised slightly (Figure 4-15a) to include a proposed architectural feature on the second floor of the structure on the northeast corner of State Street and Helena Street. This feature does not add or subtract from the potential view blockage resulting from the project.

Importance of Existing Visual Resources and Public Views

The view includes important visual resources. Though not included in the LCP—Visual Resources Map, the view does include a portion of the Santa Ynez Mountains.

The view has limited scenic quality. From this viewpoint location, only a portion of the Santa Ynez Mountains are visible, and therefore the magnitude of the view is not abundant. Although the Santa Ynez Mountain ridgeline and foothill areas can be seen, they are blocked in many locations by existing development (particularly by the Bekins Building), street palm trees, and street lights. The intactness of the view is compromised. The view of the Santa Ynez Mountains is not distinctive of views along lower State Street. Therefore, ~~Due to these intrusions, the~~ Vi~~vi~~ew 8 of the Santa Ynez Mountains is neither abundant, intact, nor distinctive.

The viewpoint is a moderately visited public location. The viewpoint is along lower State Street, and therefore could be experienced by pedestrians, bicyclists, and vehicles traveling from the Waterfront area up State Street, toward the central business district. There are no public gathering spaces where people would linger in this locale. As a result, the duration of the visitor's view is generally short.

Therefore, although View 8 contains some views of the Santa Ynez Mountains, it is a less than important public scenic view. ~~in that~~ The view has limited scenic quality due to its lack of magnitude, substantial intrusions and compromised intactness, lack of distinctiveness, and only ~~has~~ moderate visitation.

Project Impact Assessment

View 8 itself is a less than important public scenic view. Therefore, the development of the Entrada project would not impact an important public scenic view or view corridor.

* Note: A revised View 8 photosimulation is included in the FEIR (Figure 4-15a. Revised View 8a). The View 8 photosimulation included in the DEIR omitted a second-story building element on the right side of the public plaza (adjacent to a second story trellis). the Revised View 8a correctly depicts the second-story building element. The existing visiual resources and impact assessment are not affected by this revision.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-15. View 8: Looking Through Area C from Entrance of Californian Hotel

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-15a. Revised View 8a: Looking Through Area C from Entrance of Californian Hotel

This page intentionally left blank.

4.4.10 View 9: Looking East Across State Street From Mason Street

Location Description

View 9 (Figure 4-16) is taken from the west side of lower State Street, from the mid-point of the pedestrian crosswalk at Mason Street. The photograph is taken directly toward the Entrada project Area B and C.

Importance of Existing Visual Resources and Public Views

View 9 is framed by existing development and could be considered a view corridor. The corridor includes important visual resources. Though not included in the LCP—Visual Resources Map, the corridor does include portions of the Santa Ynez Mountains as seen from State Street, considered important per City policy.

The corridor has very limited scenic quality. Though the Santa Ynez Mountains are present in the view, they are obstructed by existing development, primarily the Hot Spots and Bekins Storage buildings, telephone poles, and utility lines. Due to these intrusions, the Santa Ynez Mountains in this view are neither abundant, intact, nor distinctive.

The viewpoint of the corridor is a public location which is passed by many viewers, though the duration of visitation is short. The viewpoint is along lower State Street and therefore could be experienced by pedestrians, bicyclists, and vehicle travelers traveling between the Waterfront area and Downtown. There are no public gathering spaces where people would linger in this locale. As a result, the duration of the visitor's view is generally short. The view in this photo would not be the dominant view along lower State Street.

View 9 itself is a less than important public scenic view, in that it has limited scenic quality due to substantial intrusions, and the duration of the visitor's view is short.

Project Impact Assessment

View 9 is a less than important public scenic view. Therefore, the development of the Entrada project would not impact an important public scenic view or view corridor. The Entrada project would result in the removal of overhead utility lines, a beneficial impact on public views.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-16. View 9: Looking East Across State Street from Mason Street

This page intentionally left blank.

4.4.11 View 10: Looking Through Area C From BeBop Burgers Restaurant

Location Description

View 10 (Figure 4-17) is taken from lower State Street north of Mason Street. The photograph is taken directly toward the Entrada project Area C. In order to provide a sense of the views that would be experienced by turning slightly toward turning one's head to both northward and southward from this viewpoint, additional photographs were taken that slightly overlap the View 10 frame: one looking up State Street (View 10a, Figure 4-17a; and one looking south on State Street (View 10b, Figure 4-1b) toward ~~Stearn's~~Stearns Wharf. These overlapping views provide a more realistic sense of a person's actual visual experience as they would proceed through the Entrada project area. (see Appendix D for additional explanation)

Importance of Existing Visual Resources and Public Views

Views 10, 10a, and 10b include important visual resources. Views 10 and 10a include portions of the Santa Ynez Mountains, while 10b includes the open area at the Dolphin Fountain at the base of ~~Stearn's~~Stearns Wharf.

Views 10 and 10a have limited scenic quality. Though portions of the Santa Ynez Mountains and ridgeline are present in these views, these views have limited magnitude. Views of the Santa Ynez Mountain ridgeline are not continuous and the view of the Dolphin Fountain and Waterfront is more of a view corridor framed by development on either side of State Street. ~~t~~The intactness of the views~~y~~ are generally compromised and degraded by the presence of structures, including the Bekins Storage building, telephone poles, overhead utility lines, and street trees~~.—~~. The view of the mountains is not distinctive of views along lower State Street. Therefore, ~~Due to these substantial intrusions,~~ the Santa Ynez Mountains in this view are neither abundant, intact, nor distinctive. Further, as demonstrated by the View Angle Analysis (Appendix E), any structure over 16 feet 8 inches would block mountain views from this viewpoint location.

View 10b does not include mountain vistas, but does include a small portion of the ~~Stearn's~~Stearns Wharf (an important structure), and the tops of palm trees aligning Cabrillo Boulevard associated with Chase Palm Park and the City Waterfront. ~~Views of the palm trees are obstructed by existing development, including the Hot Spots Building and other street palm trees along State Street. In addition,~~ Tthe ~~scenic quality~~magnitude of View 10b is only considered moderate because these scenic elements are in the background and are not part of a continuous, sweeping view that ties the portion of the wharf and the palm trees to the open space associated with Chase Palm Park, East or West Beach, and the Waterfront. Additionally, views of the palm trees are obstructed by existing development, including the Hot Spots Building and other street palm trees along State Street, such that the intactness of the view has been compromised. The view of the Dolphin Fountain and palm trees associated with the waterfront is not distinctive from locations on lower State Street. The view in this photo would not be the dominant view along lower State Street. -The view of Waterfront visual components from View 10b is therefore neither abundant, intact, nor distinctive.

The viewpoint for Views 10, 10a, and 10b is a public location that is passed by many viewers, though the duration of visitation is short. The viewpoint is along lower State Street and is experienced by pedestrians, bicyclists, and vehicle travelers as they move between the Waterfront and Downtown. Neither the BeBop Burger parking lot nor the State Street sidewalk adjacent to it represent an important public gathering space where people would linger to experience the view, and therefore the duration of the visual experiences from these viewpoints is relatively brief. ~~The view in this photo would not be the dominant view along lower State Street.~~

Consequently, Views 10, 10a, and 10b are less than important public scenic views. Though they contain important visual resources, these views are not scenic and they are experienced for a limited duration. The visual resources of View 10b, though including some visual resources associated with the Waterfront, ~~are—~~have limited magnitude, have been degraded by substantial intrusions, and are not distinctive of lower State Street viewpoints. As a result, the view has limited scenic quality.

Project Impact Assessment

Views 10, 10a, and 10b are less than important public scenic views. Therefore, the development of the Entrada project would not impact an important public scenic view or view corridor.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-16. View 9: Looking East Across State Street from Mason Street

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-17. View 10: Looking Through Area C from BeBop Burgers Restaurant

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-17a. View 10a: Looking North on State Street from BeBop Burgers Restaurant

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-17b. View 10b: Looking South on State Street from BeBop Burgers Restaurant

This page intentionally left blank.

4.4.12 View 11: Looking Toward Areas C and B From City Railroad Depot

Location Description

View 11 (Figure 4-18) is taken from the entrance to the City Railroad Depot at State and Yanonali streets. The photograph is angled southeast to encompass proposed project Area C. In order to provide a sense of the views that would be experienced by slightly turning northward from this same viewpoint, an additional photograph was taken that slightly overlaps the View 11 frame (View 11a, Figure 4-18a). These overlapping views provide a more realistic sense of a person's actual visual experience as they would proceed through the Entrada project area (see Appendix D for additional explanation). As View 11a shows, the Entrada project would not be visible in the 11a field of view and, as a result, would have no effect on that view of the Santa Ynez mountains.

Importance of Existing Visual Resources and Public Views

View 11 includes very few important visual resources, and these are very small due to their distance. View 11 does not include mountain vistas, but does include the tops of some palm trees aligning Cabrillo Boulevard, associated with Chase Palm Park and the Waterfront.

View 11 has limited scenic quality due to existing visual intrusions. The background is substantially disrupted by existing development including the Bekin's Storage building, overhead utility lines, street lighting, and railroad crossing gates. Views of the palm trees are obstructed by existing development including the Hot Spots Building and other street palm trees along State Street. The scenic quality of View 11 is considered low, because these scenic elements are in the background and are not part of a continuous, sweeping view that ties the line of palm trees to the open space associated with Chase Palm Park, East or West Beach, ~~Stearn's~~Stearns Wharf and Waterfront maritime activities. View 11 visual resources are neither abundant, intact, nor distinctive.

The viewpoint is a heavily visited public location. Like other locations along lower State Street, the viewpoint is experienced by pedestrians, bicyclists, and vehicle travelers as they move between the Waterfront and the central business district. Importantly, the view is also from a very busy public gathering space, the waiting and boarding area of the City Railroad Depot. However, the View 11 would not be the dominant view from this location; viewers would likely turn their head north to take in View 11a.

Given its limited visual resources and limited scenic qualities, View 11 is not an important public scenic view.

Project Impact Assessment

View 11 is a less than important public scenic view. Therefore, the development of the Entrada project would not impact an important public scenic view or view corridor.

In addition, View 11a shows the larger field of view available from this location and demonstrates the limited nature of the Entrada project's effect on public views from the City Railroad Depot entrance, as well as the other public gathering areas adjacent to the Depot.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-18. View 11: Looking Towards Areas C and B from City Railroad Depot

View 11: Proposed Condition

Figure 4-18a: View 11a: Panoramic Contextual View

This page intentionally left blank.

4.4.13 View 12: Looking Toward Area C From City Railroad Depot

Location Description

View 12 (Figure 4-19) is taken from the outdoor passenger loading area at the City Railroad Depot on lower State Street at Yanonali Street. The photograph is angled east to encompass the northern most side of proposed project Area C.

Importance of Existing Visual Resources and Public Views

The view includes some important visual resources. Though not included in the LCP—Visual Resources Map, the view does include a small portion of the Santa Ynez Mountains and foothills. City visual resource policies indicate that views of the mountains from State Street are important.

The view lacks scenic quality. Though the Santa Ynez Mountains are present in the view, they are extremely limited and are generally degraded by existing development, including the Bekins Storage building, overhead utility lines, street trees, and City Railroad Depot light poles. The Santa Ynez Mountains and foothills in the view are neither abundant, intact, nor distinctive.

The viewpoint is a heavily visited public location. Importantly, the viewpoint is also a very busy public gathering space, the waiting and boarding area of the City Railroad Depot.

View 12 includes some important visual resources but these features are substantially degraded by intrusive development. As a result, the view lacks scenic quality. **Though a highly visited public viewpoint location, View 12 is not an important public scenic view due to limited inclusion of important visual resources and lack of scenic quality.**

Project Impact Assessment

View 12 is a less than important public scenic view. Therefore, the development of the Entrada project would not impact an important public scenic view or view corridor.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-19. View 12: Looking Toward Area C from City Railroad Depot

This page intentionally left blank.

4.4.14 View 13 : Looking Down State Street Toward ~~Stearn's~~Stearns Wharf From Yanonali Street

Location Description

View 13 (Figure 4-20) is taken from the south side of Yanonali Street, from the mid-point of the pedestrian crosswalk at State Street. (A revised Figure 4-20a is included to illustrate the sidewalk on the right side of State Street that is not shown in the proposed condition in Figure 4-20. The conclusions of the EIR are not affected by this revision.) The photograph is taken directly south along State Street toward the Entrada project Area B and C.

Importance of Existing Visual Resources and Public Views

View 13 is framed by existing development and is considered a view corridor. The corridor is large enough to provide a sense of contrast between the urban area in the foreground and the important visual resources in the background. This corridor includes important visual resources such as the Dolphin Fountain, ~~Stearn's~~Stearns Wharf (an important structure), and the tops of palm trees aligning Cabrillo Boulevard, associated with Chase Palm Park and the City Waterfront.

The view has scenic quality. The scenic quality of View 13 is considered high due to the scenic elements associated with the Waterfront at the end of the lower State Street corridor. The corridor aspect of the view overcomes the lack of a continuous, sweeping view that ties the view of the fountain and wharf to the palm trees and open space associated with Chase Palm Park, East or West Beach, and Waterfront maritime activities. Views of the Dolphin Fountain and ~~Stearn's~~Stearns Wharf elements associated with the Waterfront are intact and distinctive. However, views of the palm trees along Cabrillo Boulevard, while an important visual resource, do not contribute to the scenic qualities of View 13 due to the various obstructions that obscure their location and height.

The viewpoint is a heavily visited public location near the City Railroad Depot. On lower State Street, this location is passed by pedestrians, bicyclists, and vehicle travelers as they move between the Waterfront area and Downtown. The viewpoint is also adjacent to a public gathering space, the waiting and boarding area of the City Railroad Depot. The duration of the view within the street crosswalk would be relatively brief, however.

Therefore, View 13 is an important public scenic view. The View 13 corridor looking down lower State Street includes important intact visual components associated with the Waterfront that make it distinctive. Though views of Chase Palm Park palm trees are substantially degraded by intrusive development, the view otherwise has very high scenic quality. View 13 is also from a heavily visited viewpoint, although the duration of the viewing experience is relatively brief.

Project Impact Assessment

The Entrada project in View 13 is prominent as it introduces three-story building elements compared to the primarily one-story existing development. Entrada project redevelopment replacing the Californian Hotel on the west side of State Street would not be visible from this view. While the project would block the tops of palm trees lining Chase Palm Park, the view of these palm trees is already largely obstructed. The Entrada project would not block important scenic views down the State Street corridor of the Dolphin Fountain and ~~Stearn's~~Stearns Wharf. The proposed widening of sidewalks and associated narrowing of lower State Street pavement would have no effect on the important public scenic views available of the Waterfront. Proposed landscaping along the expanded sidewalks would complement the existing sidewalk strip vegetation, but would not obstruct views of the Chase Palm Park trees, the Dolphin Fountain, or ~~Stearn's~~Stearns Wharf.

The change introduced by the Entrada project as experienced in View 13 would not significantly block or otherwise significantly degrade an important public scenic view or view corridor, nor would the project substantially impair the visual context of the Waterfront area. Observers at this viewpoint currently have views of lower State Street down to ~~Stearn's~~Stearns Wharf along an urban corridor, transitioning from the central business district to the Waterfront. The proposed development would be consistent with the urban corridor's character. This is a less than significant impact on important public scenic views of visual resources.

EXISTING CONDITION

NOTE:
State Street rises at the near and far ends of this view. This is not reflected in the geometry of the computer model. The model was lined up with the lowest part of State Street (the intersection of Mason and State). This was done to best convey the impacts on the view. A side effect of this is that the sidewalk appears to extend beyond the RR crossing guard, as seen here. In fact it does not do so, as shown in the fully rendered simulations where the foreground has cut off the view of the sidewalk.

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-20. View 1.3: Looking Down State Street Toward Stearn's Wharf from Yanonali Street

EXISTING CONDITION

NOTE:
State Street rises at the near and far ends of this view. This is not reflected in the geometry of the computer model. The model was lined up with the lowest part of State Street (the intersection of Mason and State). This was done to best convey the impacts on the view. A side effect of this is that the sidewalk appears to extend beyond the RR crossing guard, as seen here. In fact it does not do so, as shown in the fully rendered simulations where the foreground has cut off the view of the sidewalk.

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-20a. View 13a: Looking Down State Street Toward Stearn's Wharf from Yanonali Street

This page intentionally left blank.

4.4.15 View 14: Looking South On State Street From the Montecito Street Overpass

Location Description

View 14 (Figure 4-21) is taken from the Montecito Street overpass at State Street. The photograph looks somewhat down the eastern side of State Street and encompasses the frontage of both proposed project Areas B and C.

Importance of Existing Visual Resources and Public Views

View 14 is framed by existing development and could be considered a view corridor. This view corridor contains important visual resources, including a small section of ~~Stearn's~~Stearns Wharf and the tops of palm trees aligning Cabrillo Boulevard.

The view corridor has moderate scenic quality. The important visual resources in the view (~~Stearn's~~Stearns Wharf and palm trees) are so far away as to be only somewhat discernable. A large portion of the background is obscured by existing development along lower State Street. The one- and two-story development on the eastern side of lower State Street obstructs much of the view of palm trees at Chase Palm Park.

The viewpoint for View 14 is a moderately traveled public location, the Montecito Street overpass above State Street. Montecito Street has only limited pedestrian traffic and persons in vehicles travel past the viewpoint at a rapid rate. Therefore, the visual encounter is very short in duration.

View 14 is not an important public scenic view or view corridor. The View 14 corridor includes limited visual components associated with the Waterfront (palm trees along Cabrillo Boulevard and Chase Palm Park, and ~~Stearn's~~Stearns Wharf) that make it moderately important, but these features are substantially degraded by their distance from the viewpoint and by intrusive development. As a result, the view has very limited scenic quality. Further, the viewpoint is in a only moderately visited location.

Project Impact Assessment

View 14 itself is a less than important public scenic view. Therefore, the development of the Entrada project would not impact an important public scenic view or view corridor, nor would the project substantially impair the visual context of the Waterfront area.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-21. View 14: Looking South on Montecito Street from U.S. 101/State Street Overpass

This page intentionally left blank.

4.4.16 View 15: Looking East From Intersection of Chapala and Mason Streets

Location Description

View 15 (Figure 4-22) is taken from the southern side of West Mason Street at the intersection with Chapala Street. The photograph is taken at a slightly northeast angle to encompass the southern side of proposed project Area C. Proposed Entrada project Areas A and B would be located in the center of this photograph, though masked by proposed vegetation (refer to section 4.3.17: View 16).

Importance of Existing Visual Resources and Public Views

View 15 is framed by existing development and is considered a view corridor. The corridor includes an important visual resource, the Santa Ynez Mountains and foothills as viewed from lower elevations of the City, as per the City General Plan Conservation Element. View 15 is not included as either having a desirable foreground or background per the LCP – Visual Resources Map.

The view has very limited scenic quality. Though the Santa Ynez Mountains are present in the view corridor, they are extremely limited and generally degraded by existing development, including the Bekins Storage building, overhead utility poles and lines, and street trees. The Santa Ynez Mountains and foothills in the view are framed by the corridor formed by Mason Street development, but these visual resources are neither abundant, intact, nor distinctive.

The viewpoint is in a generally residential area and gets relatively little visitation from those individuals travelling along State Street.

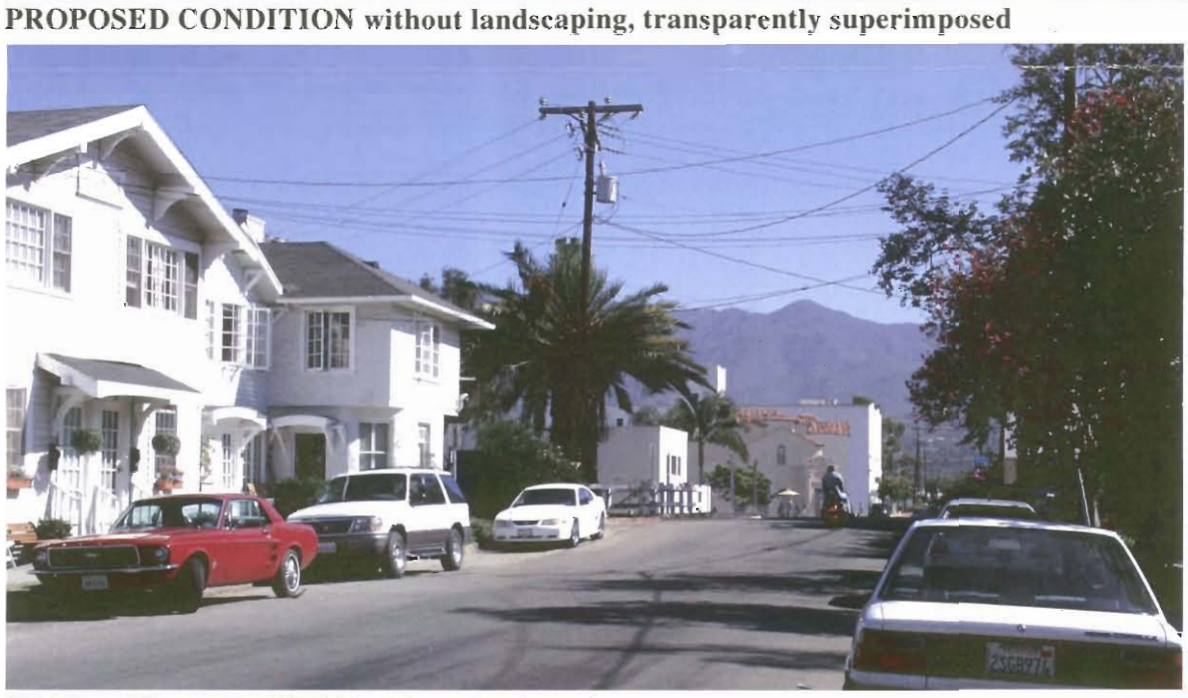
Therefore, View 15 is a less than important public scenic view. The View 15 corridor includes some framed mountain and foothill vistas along Mason Street that could make it moderately important, but these features are substantially degraded by the existing intrusive development. As a result, the view has very limited scenic quality. The view location receives relatively little public visitation.

Project Impact Assessment

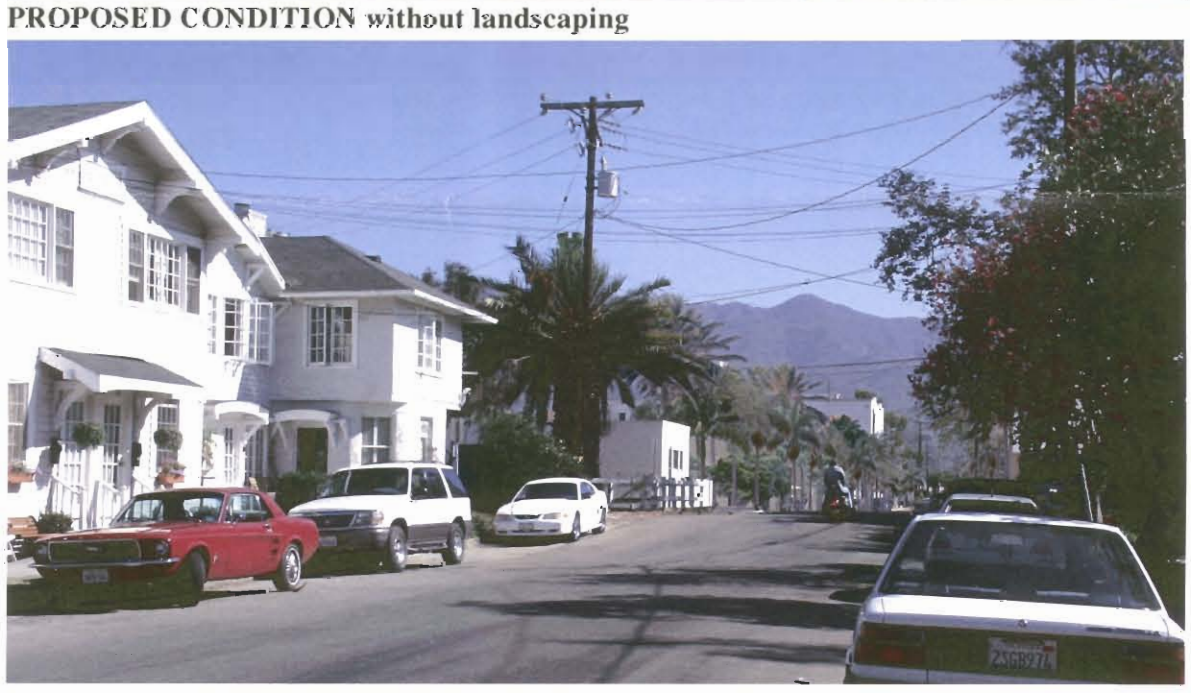
View 15 is a less than important public scenic view. Therefore, the development of the Entrada project would not impact an important public scenic view or view corridor. The Entrada project would result in the removal of overhead utility lines, a beneficial impact on public views.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed



PROPOSED CONDITION without landscaping



PROPOSED CONDITION with landscaping

Figure 4-22. View 15: Looking East from Intersection of Chapala and Mason Streets

This page intentionally left blank.

4.4.17 View 16: Looking Toward Area A From Mason Street and Mission Creek Bridge

Location Description

View 16 (Figure 4-23) is taken from the northern side of West Mason Street, at the Mission Creek Bridge. The photograph is taken at a slightly southeast angle to encompass the northern side of proposed project Areas A and B.

Importance of Existing Visual Resources and Public Views

View 16 includes an important visual resource, the Santa Ynez Mountains and foothills as viewed from lower elevations of the City, per the City General Plan Conservation Element.

The view has very limited scenic quality. Though the Santa Ynez Mountains are present in the view, they are extremely limited and generally degraded by existing development, including the Bekins Storage building, the Californian Hotel, overhead utility poles and lines, and street trees. The Santa Ynez Mountains and foothills in the view are framed by the corridor framed by development on Mason Street, but these visual resources are neither abundant, intact, nor distinctive.

The viewpoint is in a lightly visited area. As a transitional area between residential uses and visitor commercial uses, the number of visitors to this location are substantially less than the visitors to State Street and Cabrillo Boulevard.

View 16 includes a view corridor of the Santa Ynez Mountains and foothills, but these features are substantially degraded by the existing intrusive development. As a result, the view has very limited scenic quality. The view receives relatively little public visitation. As a result, View 16 is a less than important public scenic view.

Project Impact Assessment

View 16 is a less than important public scenic view to which the Entrada project would make minimal changes. Therefore, the development of the Entrada project would not impact an important public scenic view or view corridor. The Entrada project would result in the removal of overhead utility lines, a beneficial impact on public views.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-23. View 16: Looking Toward Area A from Mason Street and Mission Creek Bridge

This page intentionally left blank.

4.4.18 View 17: Looking South on Helena Avenue From Northeast Corner of Mason Street

Location Description

View 17 (Figure 4-24), representative of the Helena Avenue area, is taken from the east side of Helena Avenue at its intersection with Mason Street. The photograph is taken at a southwest angle to encompass the proposed Entrada project northeast corner of Area B.

Importance of Existing Visual Resources and Public Views

This view has limited visual resources and limited scenic quality. Only extremely minimal glimpses of Waterfront Area elements (e.g., the palm trees of Chase Palm Park) are visible in the photograph looking down Helena Avenue. Many overhead utility poles and lines and existing structures, are also visible in the existing photo. These developments substantially degrade the small amount of Waterfront Area that can be seen such that the overall view visual quality is not intact. Due to the extensive degree of the existing visual intrusions, the view has very limited scenic quality. As a transitional area between light industrial uses and retail/commercial uses, visitors to this location are substantially fewer in number than the numbers of visitors to State Street and Cabrillo Boulevard. **View 17 therefore is a less than important public scenic view.**

Project Impact Assessment

View 17 is a less than important public scenic view. Therefore, the development of the Entrada project would not impact an important public scenic view or view corridor. The Entrada project would result in the removal of overhead utility lines, a beneficial impact on public views.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-24. View 17: Looking South on Helena Avenue from Northeast Corner of Mason Street

This page intentionally left blank.

4.4.19 View 18: Looking Toward Entrada Project Site From US 101 West of State Street Bridge

Location Description

View 18 (Figure 4-25), is taken from the southbound slow lane of US 101 west of the State Street overpass (see Figure 4-7). The photograph looks southeast to frame the Entrada project Area B and C in the background.

Importance of Existing Visual Resources and Public Views

View 18 includes important visual resources, including the palm trees lining Chase Palm Park, and the recently renovated City Railroad Depot, a City Historical Landmark.

The view has moderate scenic quality. Though the view includes palm trees in the background, this visual element is so far away from this viewpoint as to be only somewhat discernable. No other elements of the Waterfront including the Dolphin Fountain or ~~Stearn's~~Stearns Wharf are visible. The City Railroad Depot, however, is very prominent in the foreground, though somewhat obscured by parking lot light posts and the Open Air Bicycles building.

The viewpoint is a heavily traveled thoroughfare, US Highway 101. However, because the view is experienced only from a vehicle and at highway speeds, the visual encounter is extremely short.

View 18, to a limited extent, meets all three criteria (includes important visual resources, has scenic qualities, and is experienced from a heavily visited public viewpoint) and is therefore a moderately important public scenic view. However, as previously mentioned, it is a visual experience of very short duration available only from an automobile.

Project Impact Assessment

The Entrada project would not be prominent in View 18, and generally would blend in with other urban development on the eastside of State Street as experienced from this location, including the Bekins Storage building and the City Railroad Depot. The project would block a very small portion of an important visual resource, the palm trees lining Chase Palm Park associated with the Waterfront. However, the view of these palm trees is already degraded by existing development. The project would not have any effect on the view of the City Railroad Depot.

While adverse, the change introduced by the Entrada project as experienced in View 18 would not substantially block or otherwise significantly degrade an important public scenic view, nor would the project substantially impair the visual context of the Waterfront area. Observers at this viewpoint currently have background views of the lower State Street area as briefly viewed from US 101, a transition from the Waterfront to the central business district. The proposed development within this corridor would be consistent with this visual expectation. This is a less than significant impact on important public scenic views.

EXISTING CONDITION

PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-25. View 18: Looking Toward Entrada Project Site from U.S. 101 West of State Street Bridge

This page intentionally left blank.

4.4.20 View 19: Looking From Alameda Padre Serra Toward Entrada Project Site

Location Description

View 19 (Figure 4-26), representative of the views from the Riviera, is taken from Sylvan Park (near Alameda Padre Serra and Dover Lane). The photograph looks over both ~~Stearn's~~Stearns Wharf and the City harbor.

Importance of Existing Visual Resources and Public Views

View 19 includes multiple important visual resources. The photograph includes both the shoreline (ocean, beach, and harbor), open space areas (beaches, water), and captures the contrast between coastline and the mountains. City policy indicates that views of the ocean and lower elevations of the City from foothill areas are important visual resources.

The view has high scenic quality. Views of the shoreline, open areas are abundant, intact, and distinctive.

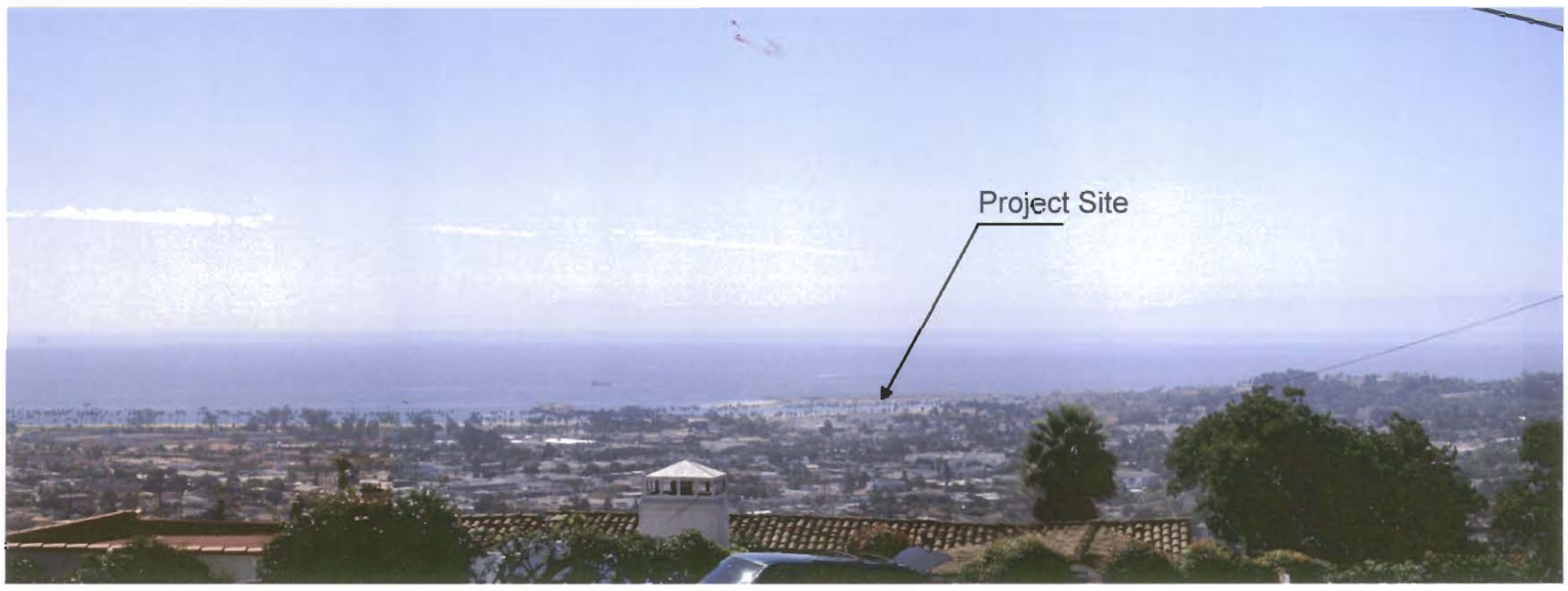
The viewpoint is a moderately visited public location, a small but public park. The view is also available to pedestrians, bicyclists, and vehicle travelers on Alameda Padre Serra.

Therefore, View 19 is an important public scenic view, as it includes important visual resources, has high scenic quality, and is moderately visited.

Project Impact Assessment

The Entrada project would be almost indiscernible in View 19, as at the distance involved it would blend in with existing urban development of the Waterfront and Downtown areas. It would not obstruct any important visual resource associated with the City Waterfront. **The change introduced by the Entrada project as experienced in View 19 would not block or otherwise significantly degrade any important public scenic view or view corridor, nor would the project substantially impair the visual context of the Waterfront area.**

EXISTING CONDITION



PROPOSED CONDITION without landscaping, transparently superimposed

PROPOSED CONDITION without landscaping

PROPOSED CONDITION with landscaping

Figure 4-26. View 19: Looking from Alameda Padre Serra Toward Entrada Project Site

4.5 SUMMARY OF PROJECT IMPACTS ON PUBLIC VIEWS

4.5.1 General Conclusion

Overall, the conclusion of this EIR, focused on public views, is that the Entrada project will result in an adverse but less than significant impact on the environment (Class III). Consequently, no required measures are necessary in order to mitigate the project's public view impacts to a less than significant level. The conclusion of this EIR is based on the totality of 19 separate view and project impact analyses as described below under View Analysis and Impact Conclusions.

In its review of the land development permit applications associated with the Entrada project, the City may choose to address any public view effects caused by the Entrada project through the imposition of additional conditions of approval related to the project's design and size, bulk, and scale.

The conclusion of this EIR is based on the following analyses. These conclusions are summarized in Table 4-1.

4.5.2 View Analysis and Impact Conclusions

Important Public Scenic Views

Of the nineteen separate view analyses included in the EIR, nine of the representative views (Views 2, 3, 4, 5, 6, 7, 13, 18, and 19) are characterized as important public scenic views based on the criteria in Section 4.3.1. (views containing important visual resources, having scenic quality, and experienced from a heavily visited public viewpoint).

Of the nine important public scenic views, three of these views (Views 4, 7, and 18) are further characterized as only moderately important in that while they possess the criteria to be characterized as important public scenic views, the view of the important visual resources is either disrupted, degraded, or at such a distance to result in only moderate importance. The Entrada project's impact on View 4 is characterized as only negligible, while the Entrada project's impact to Views 7 and 18 are more than negligible, but less than significant.

The impact of the Entrada project on two of the other important public scenic views (Views 3 and 19) can also be characterized as negligible. The Entrada project's impact to View 3 is characterized as negligible based on its limited prominence in the view. View 19, while an important City view from the Riviera, has a negligible impact from the project since the project is barely visible from the viewpoint.

The Entrada project's impact to View 2, an important public scenic view from the Dolphin Fountain, is characterized as less than significant because the area of the important public scenic view which would be affected by the Entrada project is already degraded by existing intrusions. This is particularly true in light of the broader visual context available from this viewpoint which provides views of the Pacific Ocean and the mountain and coastal areas to the south and east of Santa Barbara and which are clearly unaffected by the Entrada project. This point is well demonstrated by Figure 4-13a (View 6a), the "Panoramic Contextual View" with respect to the impact analysis for View 2, and demonstrates the limited nature of any impact to an important public scenic view caused by the Entrada project.

The Entrada project's impact to View 13, also an important public scenic view looking down lower State Street, is characterized as less than significant because while the Entrada project is prominent in the view, the project would not substantially block the view of the identified important visual resources in the view (i.e., ~~Stearn's~~Stearns Wharf and the Dolphin Fountain).

The EIR determined that the Entrada project is prominent in Views 5 and 6, both important public scenic views. While the impacts

Table 4-1. Summary of Project Impacts on Important Public Scenic Views

		Important Visual Resources[1]												Scenic Quality[1]		Public Viewpoint[1]			Significance Criteria[2]			
View		Santa Ynez Mountains	Shoreline	Open space	Historic buildings	Desirable per LCP Visual Resources Map	From Stearns Wharf, Chase Palm Park, and East Beach	Contrast between coastline and Santa Ynez Mountains	Views/ view corridors of ocean, harbor, Santa Ynez mts. from State, Garden, or Castillo streets, or Cabrillo Blvd.	Magnitude	Intactness	Distinctiveness	Public gathering area	Major transportation corridor	Areas of extensive pedestrian/bicycle use	Important public scenic view	Substantially degrade an important public scenic view	Substantially block an important public scenic view corridor	Substantially impair the visual context of the Waterfront area	Significant Impact to Important Public Scenic View
1	Cabrillo Blvd. at Helena Ave.	X										X		X	X		N	N	N	N
2	Dolphin Fountain	X				X	X		X	X	X	X	X	X	X	X	N	N	N	LTS
3	SW corner Cabrillo Blvd. at State Street	X				X	X		X	X		X	X	X	X	X	N	N	N	LTS
4	Cabrillo Blvd. west of State Street	X				X	X		X	X	X	X	X	X	X	X	N	N	N	LTS
5	NW corner Cabrillo Blvd. at State Street	X				X	X		X	X		X		X	X	X	N	N	N	LTS
6	State St. at Mission Creek Bridge	X							X	X	X	X		X	X	X	N	N	N	LTS
7	State St. south of Mason St.	X							X					X	X	X	N	N	N	LTS
8	Californian Hotel	X							X					X	X		N	N	N	N
9	Mason St. at State St.	X							X					X	X		N	N	N	N
10	BeBop Burgers	X							X					X	X		N	N	N	N
11	City Railroad Depot Entrance			X								X	X	X	X		N	N	N	N
12	City Railroad Depot Loading Area	X							X				X	X	X		N	N	N	N
13	Yanonali St. at State St.		X	X					X	X	X	X	X	X	X	X	N	N	N	LTS
14	Montecito St. Overpass		X	X					X			X		X			N	N	N	N
15	Mason St. at Chapala St.	X															N	N	N	N
16	Mason St. at Mission Creek Bridge	X															N	N	N	N
17	Helena Ave. at Mason St.			X								X					N	N	N	N
18	US 101 West of State St. Bridge			X	X						X	X		X		X	N	N	N	LTS.
19	Alameda Padre Serra		X	X				X		X	X	X	X	X	X	X	N	N	N	N

[1] an "X" denotes that a given view contains a particular important visual resource, has a particular scenic quality, or is from a particular type of public viewpoint. A blank cell indicates that no important visual resource, scenic quality, or public viewpoint is within the view.

[2] "N" denotes no impact, "NG" denotes a negligible but less than significant impact, and "LTS" denotes an adverse but less than significant impact.

from these two particular viewpoints are negative when viewed in isolation, such impacts are not ~~environmentally~~ environmentally significant in their full panoramic context. This panoramic context (Figure 4-13a - Photo 6a "Panoramic Contextual View") illustrates the broader visual and scenic context available at these particular locations, (i.e., the west side of the first block of State Street at the Mission Creek Bridge). That is, in both instances, the panoramic context of View 6a amply demonstrates that, in its totality and on a more realistic human scale, the Entrada project's view impacts from the west side of lower State Street actually impact only a relatively minor part of a person's typical full field of vision. As a result, while the impacts from these two particular views are potentially negative when viewed in isolation, such impacts are not environmentally significant in their full panoramic context.

Not Important Public Views

Of the nineteen separate view analyses included in the EIR, 10 views (Views 1, 8, 9, 10, 11, 12, 14, 15, 16, and 17) are not characterized as important public scenic views based on the criteria in Section 4.3.1.

For Views 1, 12, and 15, the impact of the Entrada project on the views that are not important public scenic views would be essentially non-existent or negligible (i.e., no substantial change to existing views).

For Views 9, 14, and 16, the Entrada project's effect on these views would be more than negligible (i.e., it would be visible, but not necessarily prominent). However, the view is not an important public scenic view and therefore the change to the view is environmentally neutral.

The Entrada project would be prominent in Views 8, 10, 11, and 17, but the views impacted are also clearly not important public scenic views. In light of the magnitude of the Entrada project's changes to Views 10 and 11, a panoramic contextual view analysis was undertaken for both locations. Figure 4-17a (View 10a) and Figure 4-17b (View 10b) were prepared for a more comprehensive field of view analysis of View 10, and Figure 4-18a (View 11a) was prepared for a broader field of view analysis of View 11. These larger scale panoramic contextual view photos (wider and more realistic field of vision) demonstrate that, in the totality of visual circumstances and in view of the less than important nature of the two public views involved in these particular analyses, the Entrada project would not significantly impair a view characterized as not an important public scenic view from an environmental standpoint.

Conclusion

The overall analysis of public view impacts contained within this focused EIR concludes that the Entrada project would result in an adverse, but less than significant impact on the environment (Class III). Consequently, no required measures are necessary or required in order to mitigate the Entrada project's public view impacts to a less than significant environmental level.

At the same time, the City, in its review and consideration of the development application permits associated with the Entrada project, including review and consideration of its design for consistency with City land-use and Coastal Act policies, may choose to further address any public view effects associated with the Entrada project. This could be accomplished through the imposition of additional project changes through conditions of approval related to the Entrada project's overall size, its architectural design, its setback from public streets, or related to the project's overall bulk and scale. Specifically, the City staff

may choose to recommend and the City Planning Commission or City Council may consider imposition of conditions of approval which require additional size, bulk, and scale reductions, particularly with respect to certain of the third story elements of Project Areas B and C. In addition, the City may seek to increase the effect of the public view corridors currently proposed by the Applicants for Areas B and C of the Project, such that the Entrada project's effect on public views are reduced to the extent possible and the project's view benefits are increased to the greatest extent feasible. These possible recommendations are discussed further and in more detail in the section of this EIR titled, Executive Summary, Areas of Controversy and Issues to be Resolved.

4.6 CUMULATIVE 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." It is important to remember that "probable future projects" are "possible," but that they are not guaranteed to occur. "Pending" projects considered in this analysis have not even received City approval. In addition, before such "pending" projects are approved for construction, they must undergo their own environmental review, including a review of their potential for adverse public scenic view impacts.

Both CEQA and the State CEQA Guidelines require that cumulative impacts be analyzed in an EIR when the resulting impacts are cumulatively considerable, and therefore, potentially significant. 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. Further, the discussion is intended to be guided by the standards of practicality and reasonableness. According to Section 15355 of the State CEQA Guidelines:

> *"Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or 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.*

Further, according to CEQA Guidelines Section 15130 (a)(1):

> *As defined in Section 15355, a "cumulative impact" consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.*

In addition, as stated in the CEQA Guidelines Section 15064(i)(5) it should be noted that:

> *(5) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.*

Therefore, the cumulative impact discussion in an EIR focuses on whether the impacts of the project under review are cumulatively considerable within the context of impacts caused by other past, present, or probable future projects.

Table 4-~~12~~. Projects Considered in the Cumulative Impact Analysis

Site No.	*Project Location*	*Description*	*Number of Stories*	*Status (as of June 27,2000)*
1	132 Harbor Way	3,022 square-foot Office/Commercial Development	Two	Approved
2	22 Castillo Street	505 square-foot Addition to Hotel	Two	Pending
3	210 Wilson Street	2 Residential Units	Two	Pending
4	301 W. Cabrillo Boulevard	1,187 square-foot Commercial Addition	Two	Pending
5	104 Bath Street	2,084 square-foot Commercial Addition	One	Pending
6	207-213 Bath Street	Addition of three Condominium Units	Three	Pending
7	308 W. Montecito Street	~~4,922 square-foot Hotel~~Two-story mixed-use project; 5,450 s.f. of commercial on first floor, and two (2) two-bedroom 3,000 s.f. residential units on the second floor	~~Three~~Two	Pending
8	200 - 240 W. Montecito Street	6,386 square feet and 1 Residential Unit, Mixed Use Building	Two	Approved
9	211 ~~Stearn's~~Stearns Wharf	2,111 square-foot Commercial Addition (connecting the existing Sea Center to the Nature Conservancy building)	Two	Pending
10	210 ~~Stearn's~~Stearns Wharf	482 square-foot Harbor Restaurant Deck Addition	First & Second floor deck	Approved
11	28 W Cabrillo Blvd.	14,857 square-foot, 15 Room Hotel Addition	Three	Approved. Under construction.
12	209 State Street	100 square-foot Storage Building and Light Post	One	Approved
13	214 State Street	3,000 square-foot Addition to Commercial Building	Two	Pending
14	12 E. Montecito Street	11,091 square-foot Youth Hostel	Two	Approved
15	22 E. Montecito Street	30,125 square-foot Hotel	Two & Three	Pending
16	214 E. Yanonali Street	1,800 square feet and 40 Residential Units, Mixed Use Building	Two & Three	Pending
17	111 Santa Barbara Street	8,400 square-foot Commercial and 58 Live/Work Units	Two and Three	Pending
18	11 Garden Street	952 square-foot Restroom Building and Site Improvement	One	Approved
19	130 Garden Street	174,505 square-foot Hotel	Three	Pending
20	433 E. Cabrillo Boulevard	232,949 square-foot ,150 Room Hotel	Two & Three	Approved
21	623 Quinientos Street	1,450 square-foot Office	One	Approved
22	500 Ninos Drive	6,316 square-foot Educational Building	Mostly one with approx. 700 square feet two stories	Pending

Notes: **Pending** projects are those that are currently under review by the City of Santa Barbara.
Approved projects have completed the review process, have been approved by the City, and are awaiting construction.

Source: City of Santa Barbara 2000

Cumulative projects consist of possible projects that would be constructed or operated during the life of the proposed project. As stated previously, these future projects are possible, but may not be ultimately built. The City of Santa Barbara has identified 22 pending (under review) and approved projects within the Waterfront vicinity, extending west to east from the Yacht Harbor to the Andre Clark Bird Refuge south of US Highway 101. Table 4-~~1~~2 provides a list of these pending and approved projects in the regional project area for consideration of cumulative impacts in this EIR, and the project locations are displayed in Figure 4-27.

The first step in the assessment of cumulative impacts on public view resources is to identify those projects within the Entrada project vicinity that would have the potential to adversely affect important public scenic views. The potential to adversely affect important public scenic views is dependent on the size of the possible future projects. Of the projects listed in Table 4-~~1~~2, Projects Nos. 2, 5, 10, 12, 18, and 21 are too small (e.g., one-story or less, and/or 600 square feet or less) to have any possible demonstrable impact on important public scenic views of the Santa Ynez Mountains or the Waterfront. Therefore, they are eliminated from further consideration of cumulative impacts. Further, it is known that some projects would not be visible from any viewpoint along State Street or Cabrillo Boulevard. The two projects on ~~Stearn's~~Stearns Wharf at Sites 9 and 10 would be blocked from view within the Entrada project vicinity by existing two-story structures (the Sea Center and the Harbor Restaurant, respectively). These projects are therefore eliminated from further consideration. The remaining projects, Nos. 1, 3, 4, 6, 7, 8, 11, 13, 14, 15, 16, 17, 19, 20 and 22, by virtue of their height and/or orientation, could potentially contribute to cumulative impacts on important public scenic views.

The second step in the assessment of cumulative impacts on public scenic view is to determine which projects by virtue of their location in relation to the Entrada project would have the potential to contribute incrementally with the Entrada project to cumulative impacts on important public scenic views. That is, as stated in CEQA Guideline Section 15130 (6)(B)(3):

Lead agencies should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.

For each photo simulation discussed previously in Chapter 4, an Overhead Point of View Diagram was prepared that provides a two-dimensional representation of the field-of-view encompassed within the particular view. Vectors or lines are drawn from the particular viewpoint and extend in space and upward in elevation to the most distant point of the Santa Ynez Mountains or other visual feature in the view background. The view diagrams place the Entrada project as seen in the foreground of the photograph in the context of the entire view experienced from a particular viewpoint. It is important to note that intervening topography and existing structural development, landscaping, or other urban intrusions often block substantial portions of any particular field of view at lower elevations.

In order to determine if possible future projects could adversely affect the same important public scenic views as the Entrada project, the location of each relevant pending and approved project was compared to the "Overhead Point of View Diagrams" (see Figures 4-28 through 4-46, beginning on page 4-119) for views deemed "important public scenic views" in section 4.3 (i.e., those associated with Views 2, 3, 4, 5, 6, 7, 13, 18, and 19). Table 4-~~2~~3 lists the "important public scenic views," the figure number of their associated "Overhead Point of View Diagram," and the possible future projects in areas contained within the same range of view.

As explained in section 4.4.1, the view diagrams identify the entire view experienced from a particular viewpoint as far up in elevation as the horizon, either the Santa Ynez Mountains or the Waterfront. Where intervening topography and existing structural development, landscaping, or other urban

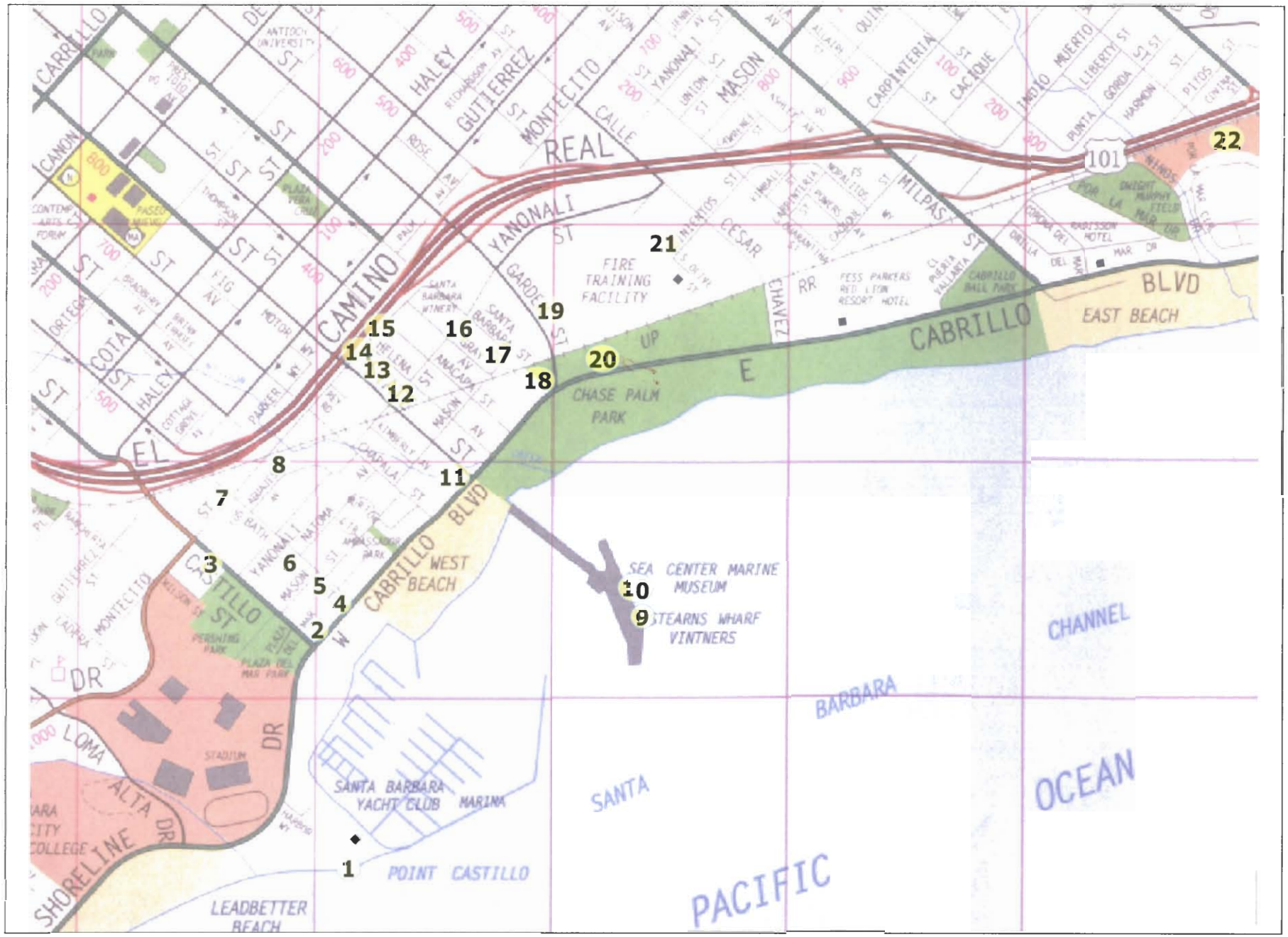


Figure 4-27. Locations of Projects Considered in the Cumulative Impact Analysis

Table 4-23. Important Public Scenic Views and Associated Overhead Point of View Diagrams and Possible Future Projects		
Important Public Scenic View Number	**Associated Overhead Point of View Diagram**	**Possible Future Projects Located Within the Field of View (Figure 4-27)**
2	Figure 4-29	11, 13, 14, 15, 16, 17 and 19
3	Figure 4-30	11, 13, 14, 15, 16, 17, and 19
4	Figure 4-31	11, 13, 14, 15, 16, 17 and 19
5	Figure 4-32	13, 14, 15, 16, 17, and 19
6	Figure 4-33	13, 14, 15, 16, 17, and 19
7	Figure 4-34	17, 19, and 20
13	Figure 4-40	11
18	Figure 4-45	11 and 13
19	Figure 4-46	1, 3, 4, 6, 7, 8, 11, 13, 14, 15, 16, 17, 19, 20, and 22

intrusions block portions of a particular field of view at lower elevations, this would eliminate the potential for other possible future projects to contribute with the Entrada project to an impact on important public scenic views. In other words, the possible future projects would only contribute with the Entrada project to result in cumulative impacts on important public scenic views in cases where they would be visible from the same viewpoint.

In View 2, the important visual resource in the public scenic view is the Santa Ynez Mountains. Reviewing View 2, any possible future project structures four stories or less in height that would be located west of State Street would be blocked from this viewpoint by the Entrada project's redevelopment of the four-story Californian Hotel building. Further, any proposed buildings east of State Street under three stories (i.e., the proposed two-story Youth Hostel at Site 14) would not be blocked by the proposed Entrada project. Projects Nos. 15, 16, and 17 fall in this range of view. While all three pending projects, should they be approved by the City, would introduce additional three-story elements into the Waterfront area, they would be a sufficient distance (e.g., over 600 feet) from this viewpoint as to block only the lower elevations of Santa Ynez Mountains as seen from Cabrillo Boulevard and State Street. They would not be viewed in any one important public scenic view corridor. **These projects would therefore not significantly contribute to cumulative impacts on important public scenic views. None of the possible future projects Nos. 15, 16, and 17 would block or otherwise significantly degrade any important public scenic view or view corridor. They would not contribute to cumulative impacts on important scenic views or view corridors of the Santa Ynez Mountains in View 2.**

In Views 3 and 4, the important visual resource present in the public scenic view is the Santa Ynez Mountains. From these viewpoints, any possible future projects three stories or less in height that would be located east of State Street would blend in with existing development (13, 14, 15, 16, 17, and 19). Site No. 11 is on the periphery of View 4. Although Site No. 11 would partially block views of the Santa Ynez Mountains from viewpoints on West Cabrillo Boulevard, the development of

Site No. 11 would block views of the Californian Hotel and not the Santa Ynez Mountains; in other words, development of Site No. 11 would blend in with the existing development shown in View 4. **None of the possible future projects Nos. 11, 13, 14, 15, 16, 17, and 19 would block or otherwise significantly degrade any important public scenic view or view corridor. They would not contribute to cumulative impacts on important scenic views or view corridors of the Santa Ynez Mountains in Views 3 and 4.**

The Santa Ynez Mountains are also the important visual resource in Views 5 and 6. In these views, any possible future project structures four stories or less in height that would be located west of State Street would be blocked from this viewpoint by the Entrada project's redevelopment of the four-story Californian Hotel building. Further, any proposed buildings east of State Street under three stories (Site Nos. 13 and 14) would not be visible. While projects Nos. 15, 16, 17 and 19 fall in this range of view and while all ~~three~~ four would introduce additional four-story elements into the Waterfront area, these projects are over 600 feet from the viewpoints of Views 5 and 6. As experienced from Cabrillo Boulevard and State Street, the projects would therefore obstruct only discontinuous segments of views including the lower elevations of Santa Ynez Mountains, while views of mountain ridgelines would be unaffected. **None of the possible future projects Nos. 15, 16, 17, and 19 would block or otherwise significantly degrade any important public scenic view, or view corridor. They would not contribute to cumulative impacts on important public scenic views or view corridors of the Santa Ynez Mountains in Views 5 and 6.**

View 7 contains only a moderately important public scenic view corridor from State Street toward the Santa Ynez Mountains. This is primarily due to the fact that under existing conditions, the view has limited scenic quality due to substantial intrusions, only has moderate visitation, and would not be the dominant view from this viewpoint location. Since existing urban development already frames the view, only projects located near the viewpoint or of extreme height would affect this corridor. **None of the possible future projects Nos. 17, 19, 20, and 22 would be of sufficient height to block or otherwise significantly degrade the important public scenic view corridor toward the Santa Ynez Mountains in View 7. They would not contribute to cumulative impacts on important public scenic views or view corridors of the Santa Ynez Mountains in View 7.**

The important visual resources in View 13 include ~~Stearn's~~Stearns Wharf (an important structure associated with the Waterfront), and the tops of palm trees aligning Cabrillo Boulevard, associated with Chase Palm Park and the Waterfront. From this viewpoint, any possible future projects less than four stories in height that would be located west of State Street (project No. 11) and any projects two stories or less in height that would be located east of State Street projects would blend in with existing development. **The approved project No. 11 (under construction) is not of sufficient height to block or otherwise significantly degrade the important public scenic view of the ~~Stearn's~~Stearns Wharf or Cabrillo Boulevard palm trees in View 13. It does not contribute to cumulative impacts on important public scenic views or view corridors, or on the context of the Waterfront area in View 13.**

The important visual resources in View 18 are the palm trees aligning Cabrillo Boulevard and the historic City Railroad Depot. **Neither of the possible future projects Nos. 11 or 13 would be of sufficient height to block or otherwise significantly degrade the important public scenic view of the City Railroad Depot in View 18. They would not contribute to cumulative impacts on important public scenic views or**

view corridors, or on the context of the Waterfront area or on the City Railroad Depot in View 18.

The important visual resources in View 19 include the shoreline (ocean, beach, and harbor), and open space areas (beaches, water), as viewed from Santa Barbara's foothill area. Due to the elevation at which View 19 is experienced, and the distance from the Entrada project (approximately 0.5 miles as the crow flies), individual structures in the Waterfront and Downtown areas are not discernable (as evidenced by the fact that even the eight-story Granada Theatre Building is indiscernible in View 19). **None of the possible future projects Nos. 1, 3, 4, 6, 7, 8, 11, 13, 14, 15, 16, 17, 19, 20 and 22 would block or otherwise significantly degrade any important public scenic view or view corridor. They would not contribute to cumulative impacts on important public scenic views or view corridors of the shoreline (ocean, beach, and harbor), and open space areas (beaches, water), as viewed from Santa Barbara's foothill area in View 19.**

As discussed above, the Entrada project and between one and five structures greater than two stories in height associated with possible future projects in the Waterfront area would be constructed within important public scenic views, as experienced in Views 2, 3, 4, 5, 6, 7, 13, 18 and 19. The primary change to these

important public scenic views would be the introduction of three-story structures between State Street and the Santa Ynez Mountains. However, the possible future projects are sufficiently distant from each other, are not experienced in the same important public scenic view corridor, and are mostly sufficiently offset from State Street such that their structures would only obstruct discontinuous portions of views of the Santa Ynez Mountains' lower elevations. These views are considered less than intact visual resources due to existing development and are less scenic than views of the Santa Ynez Mountain ridgeline. **Therefore, while the combined development of reasonably possible future projects and the Entrada project would be adverse, the cumulative impact on important public scenic views would be less than significant (Class III).**

This page intentionally left blank.

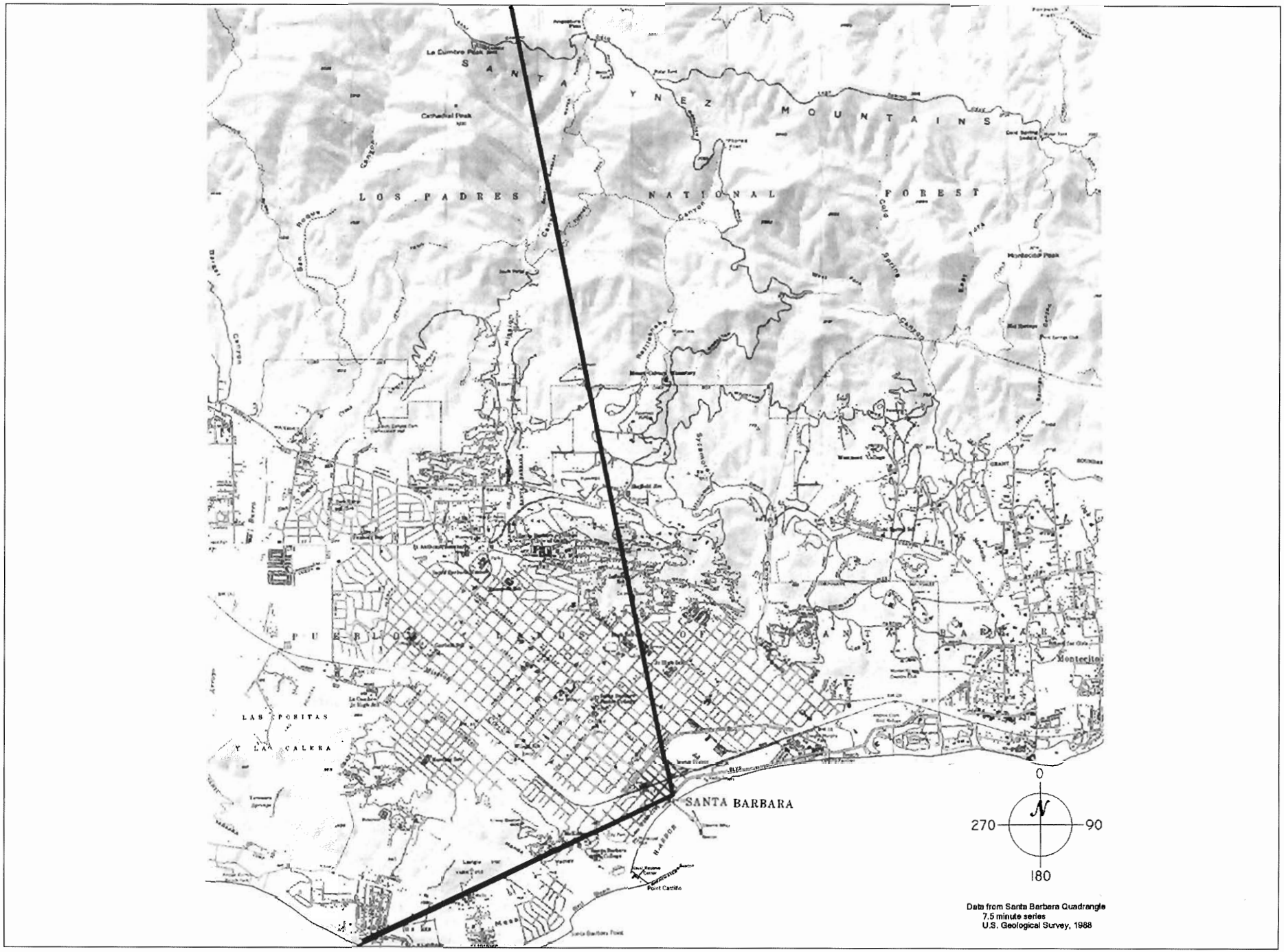


Figure 4-28. Overhead Point of View Diagram for View 1

Figure 4-29. Overhead Point of View Diagram for View 2

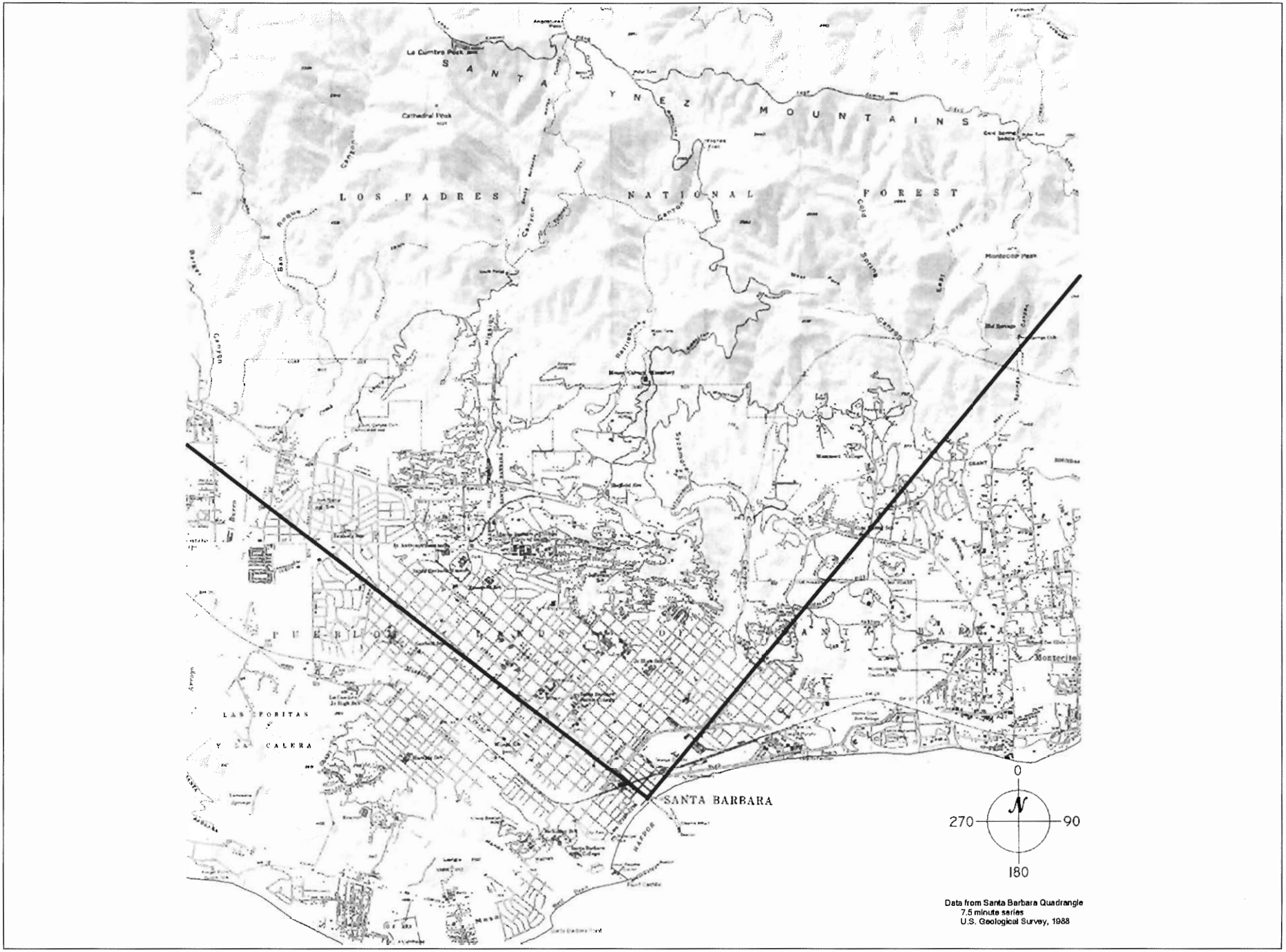


Figure 4-30. Overhead Point of View Diagram for View 3

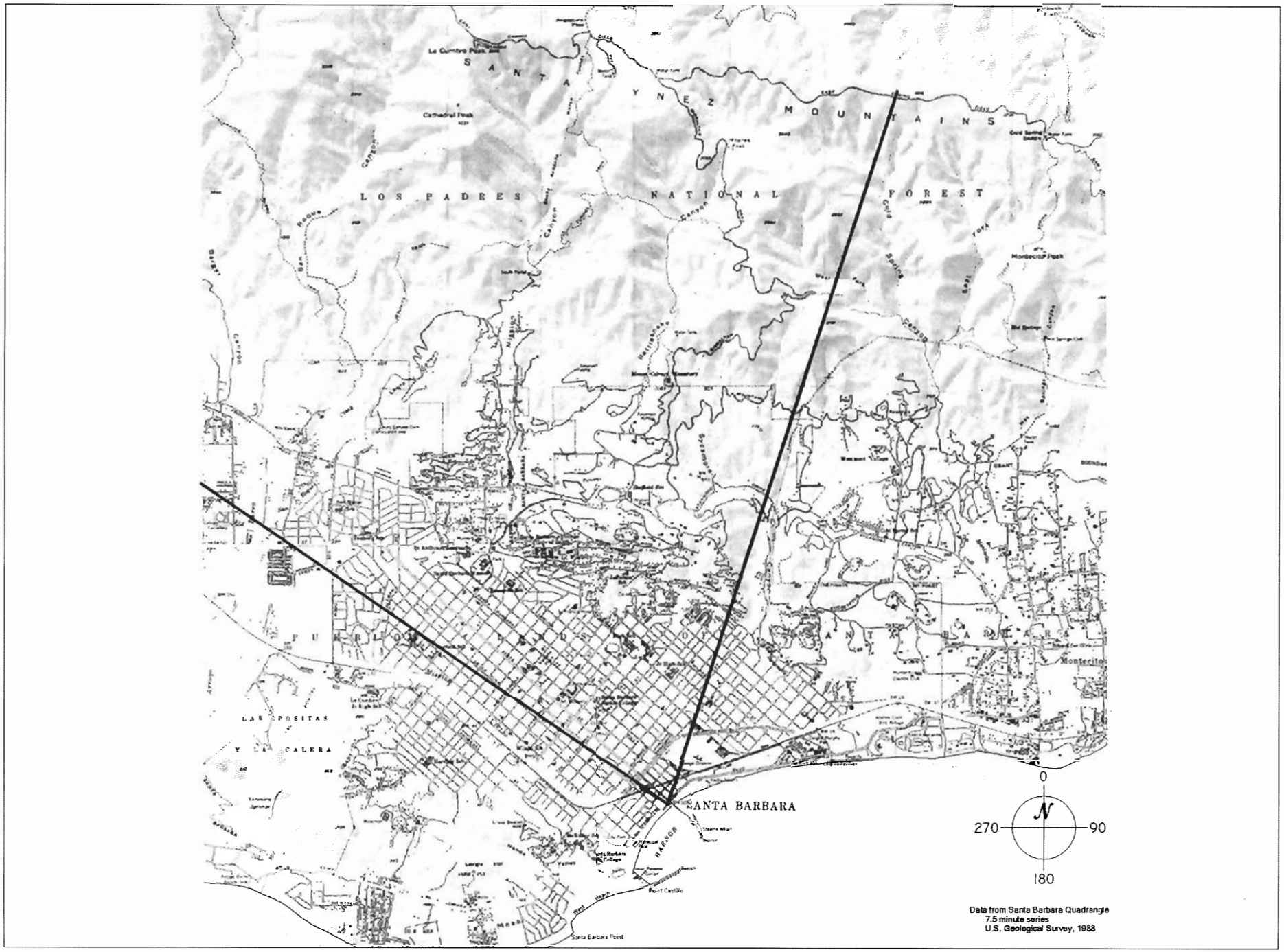


Figure 4-31. Overhead Point of View Diagram for View 4

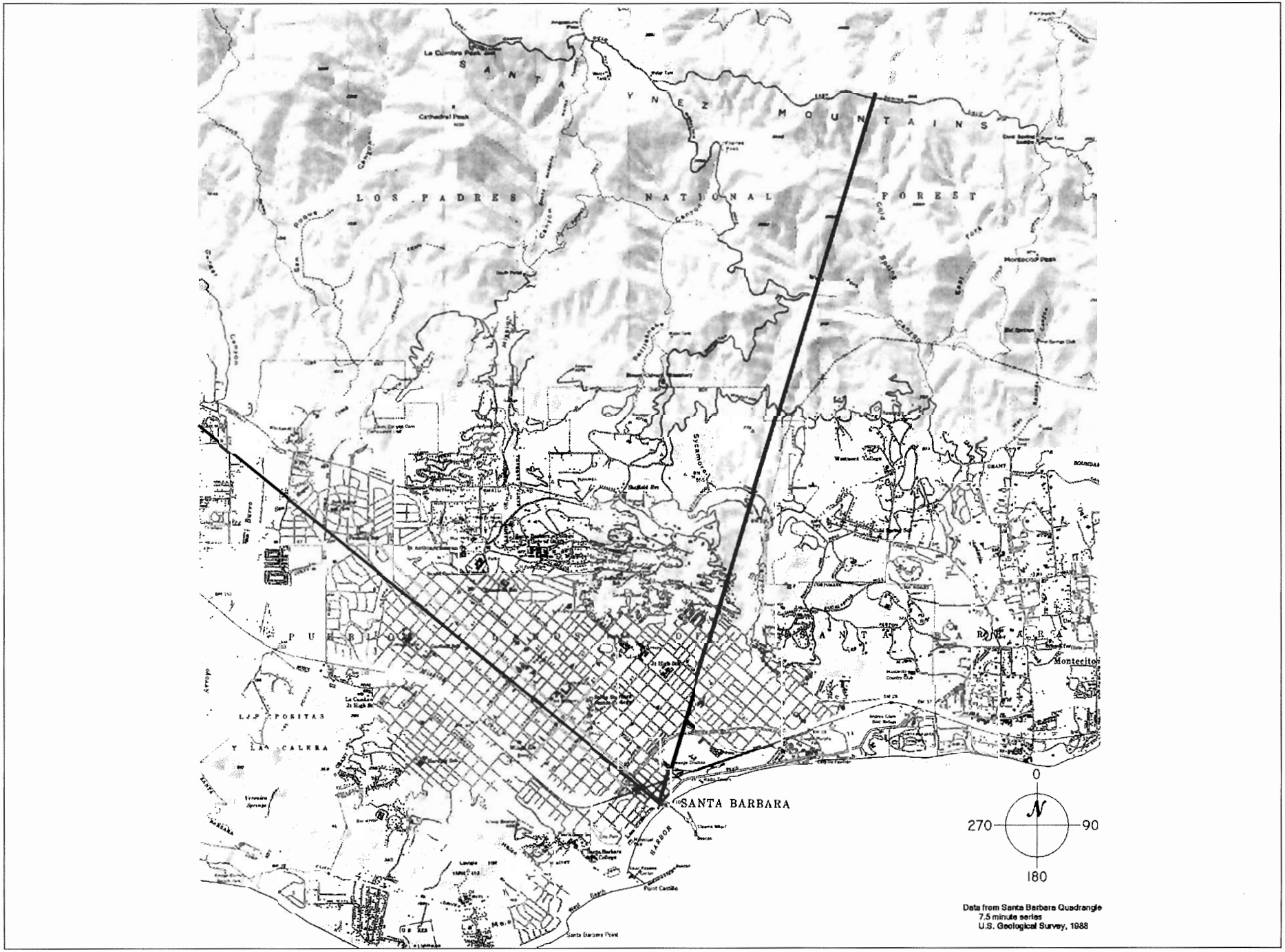


Figure 4-32. Overhead Point of View Diagram for View 5

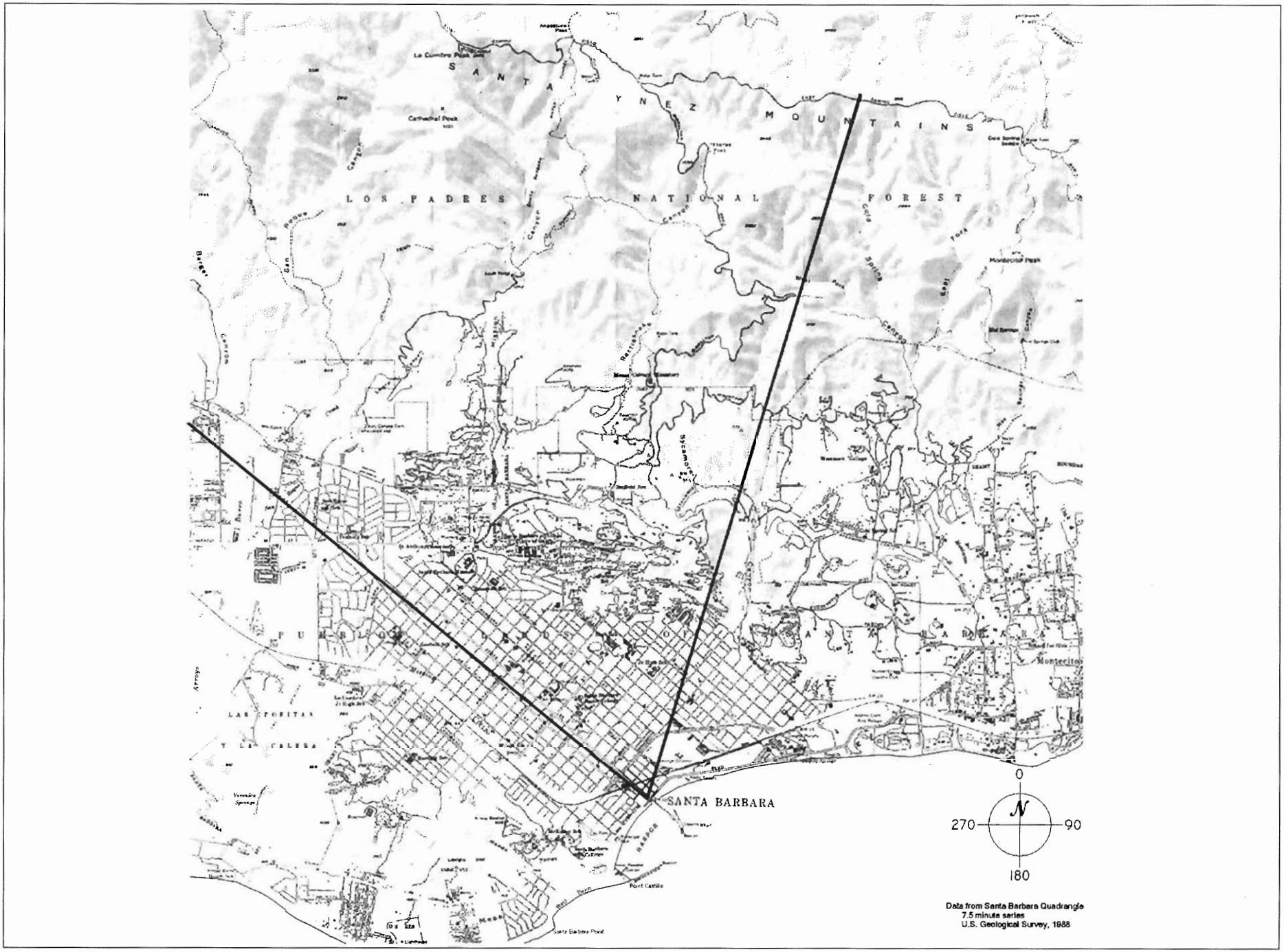


Figure 4-33. Overhead Point of View Diagram for View 6

Figure 4-34. Overhead Point of View Diagram for View 7

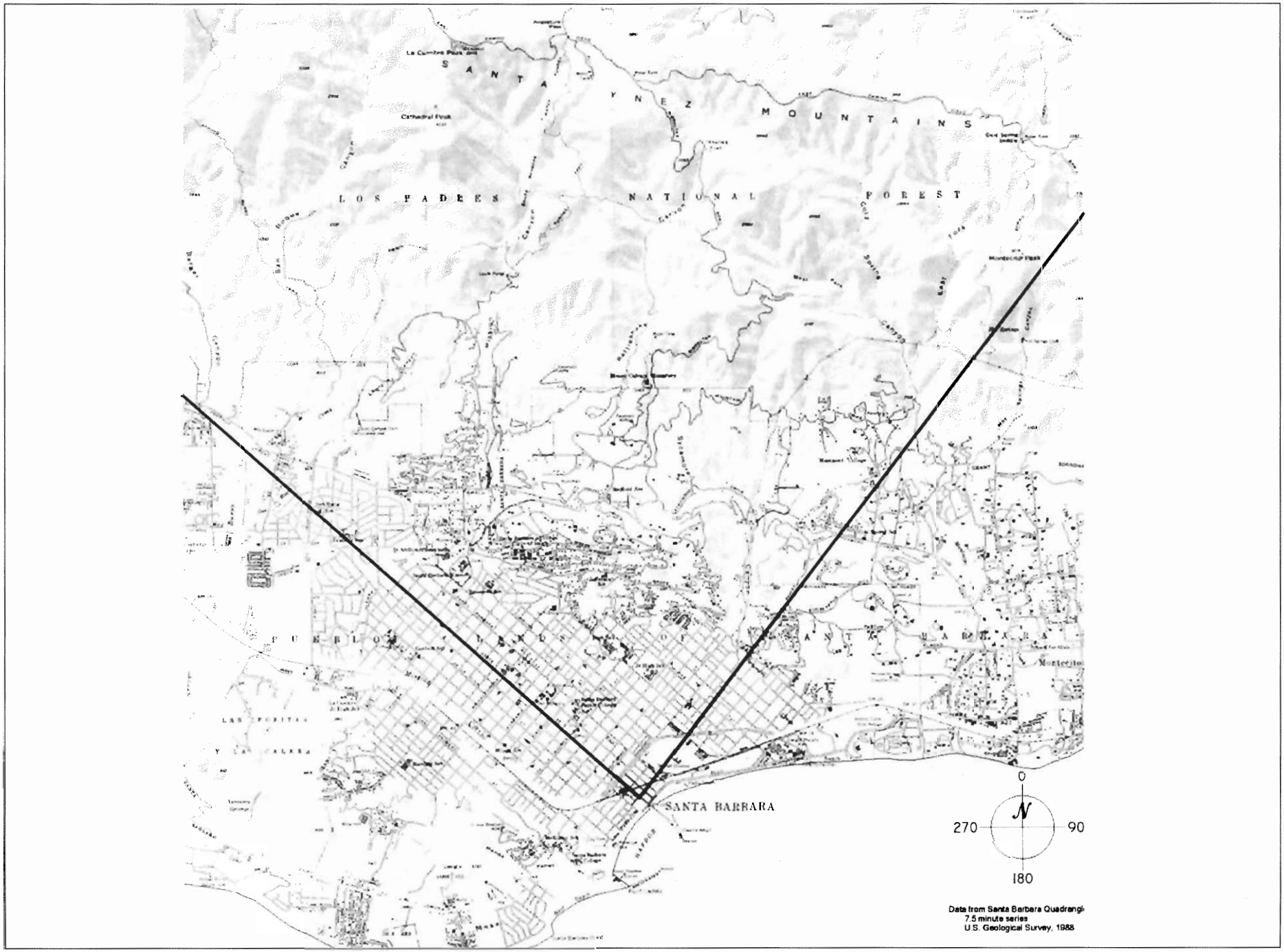


Figure 4-35. Overhead Point of View Diagram for View 8

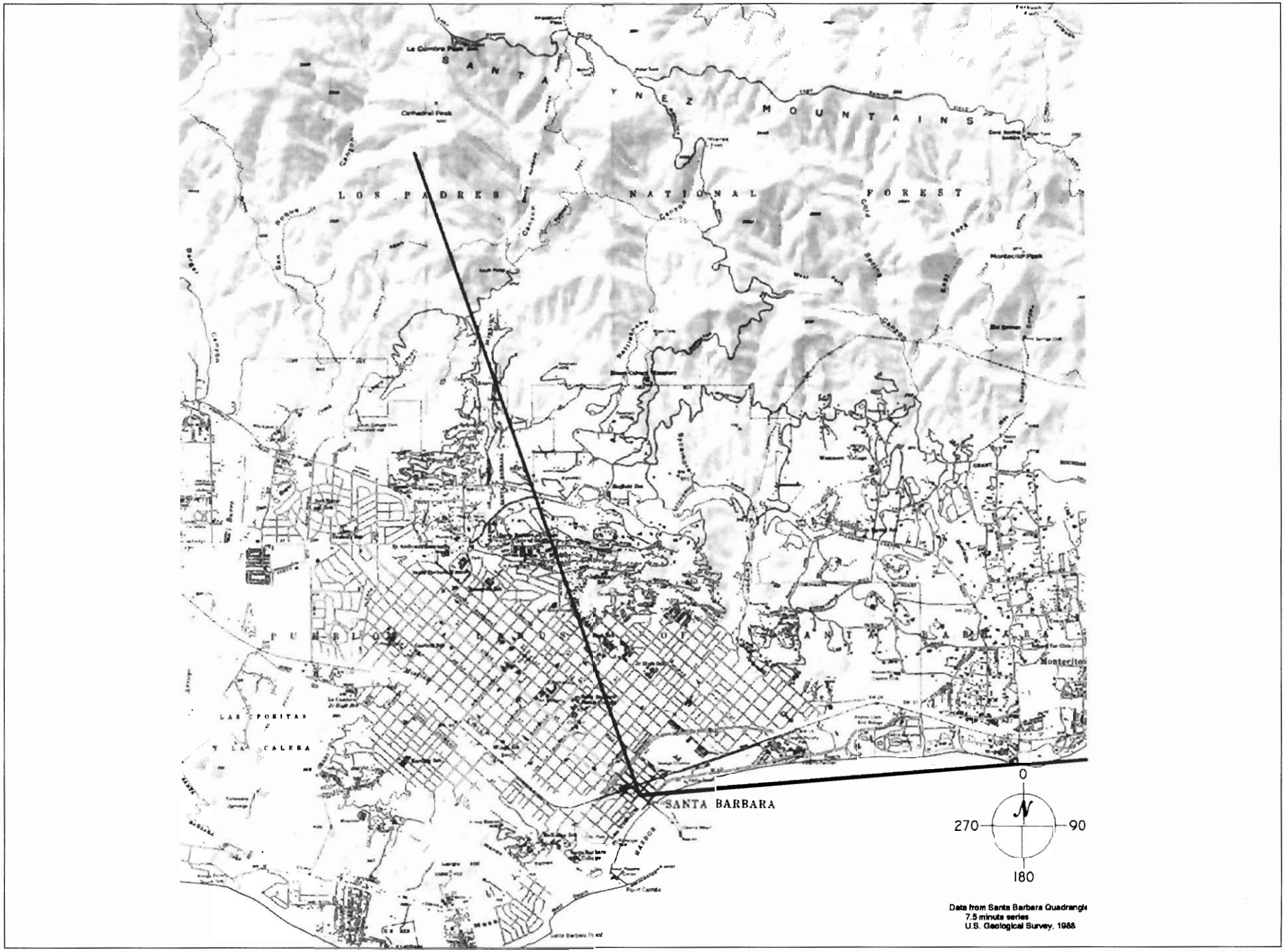


Figure 4-36. Overhead Point of View Diagram for View 9

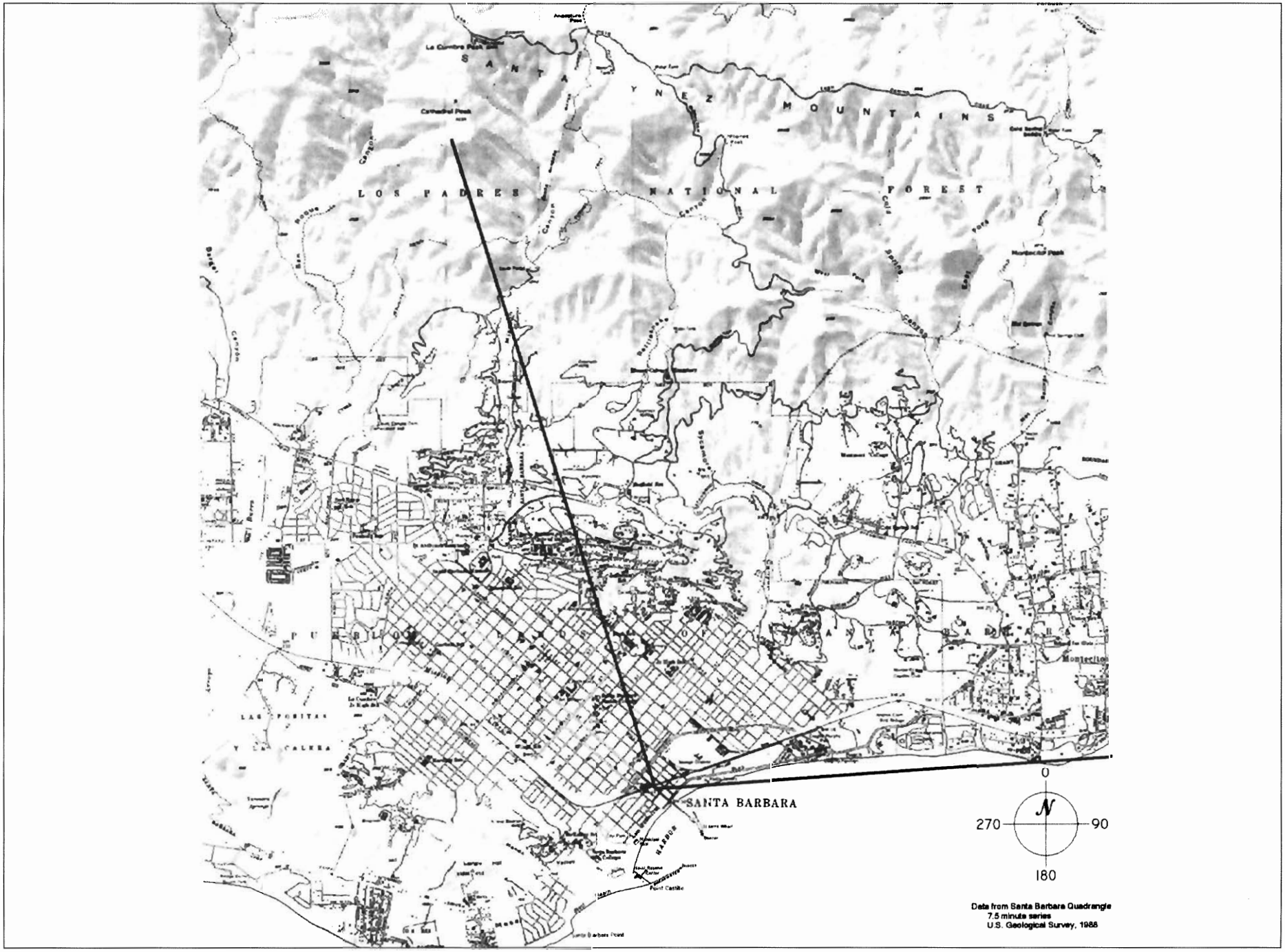


Figure 4-37. Overhead Point of View Diagram for View 10

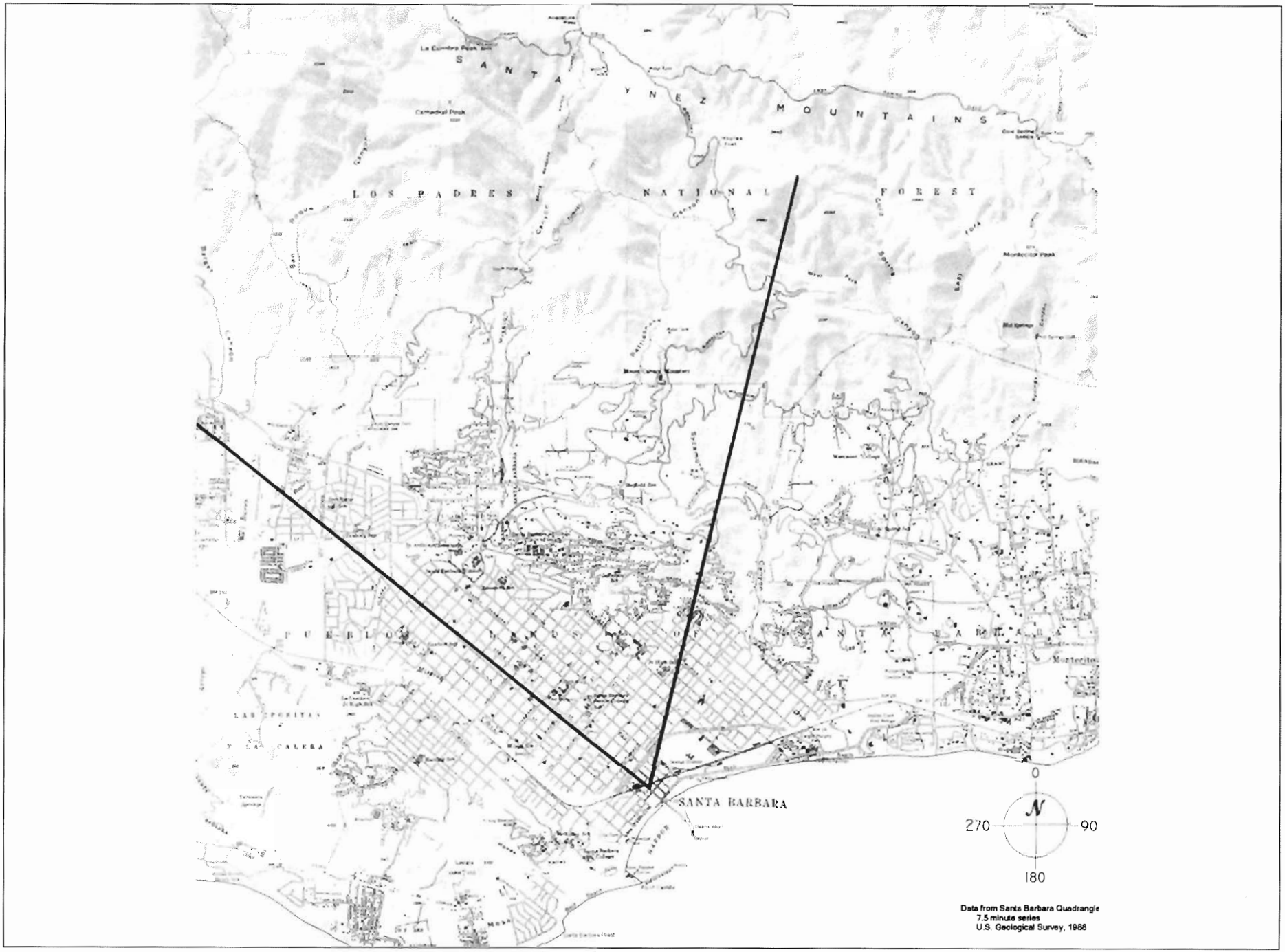


Figure 4-37a. Overhead Point of View Diagram for View 10a

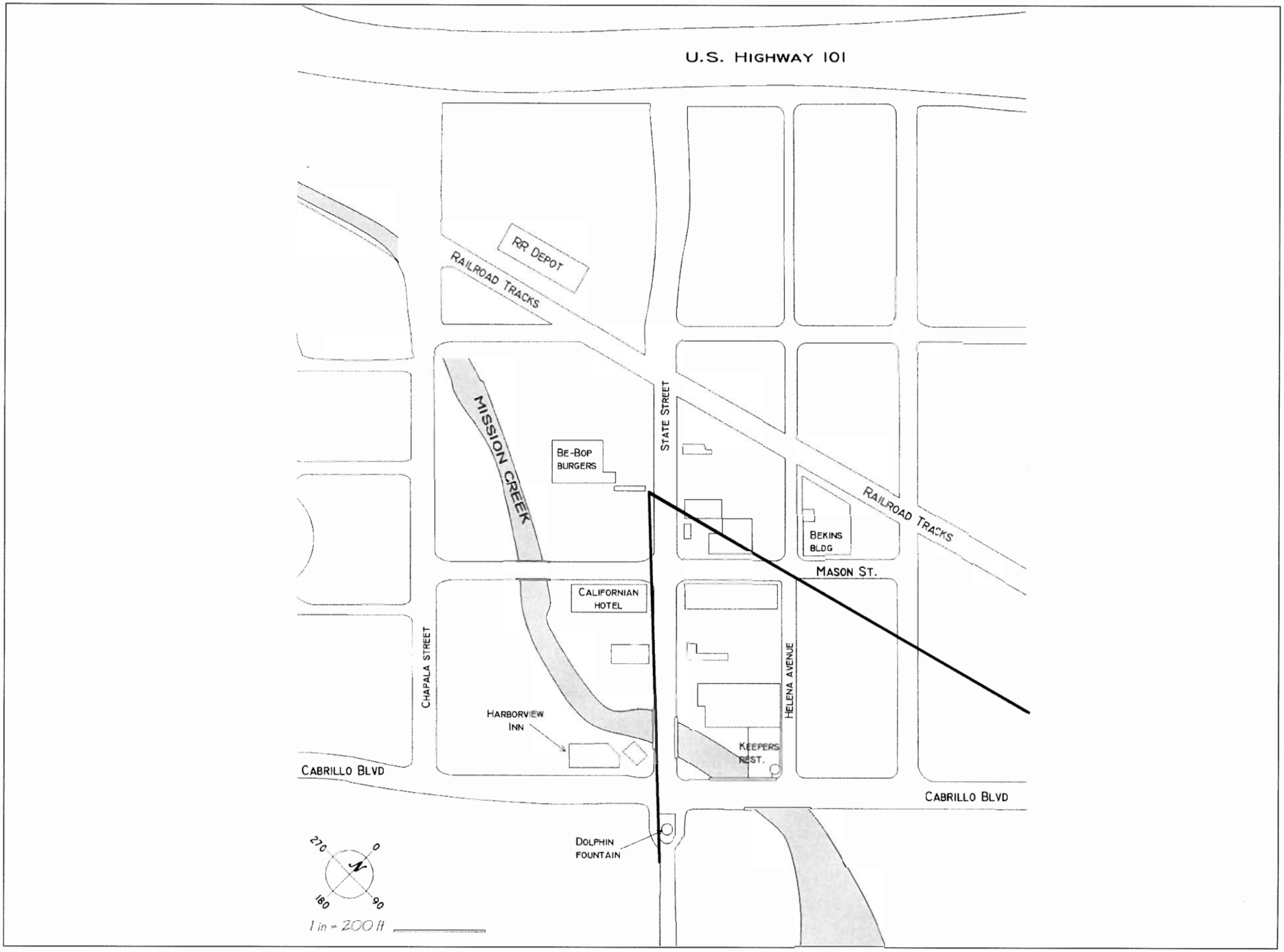


Figure 4-37b. Overhead Point of View Diagram for View 10b

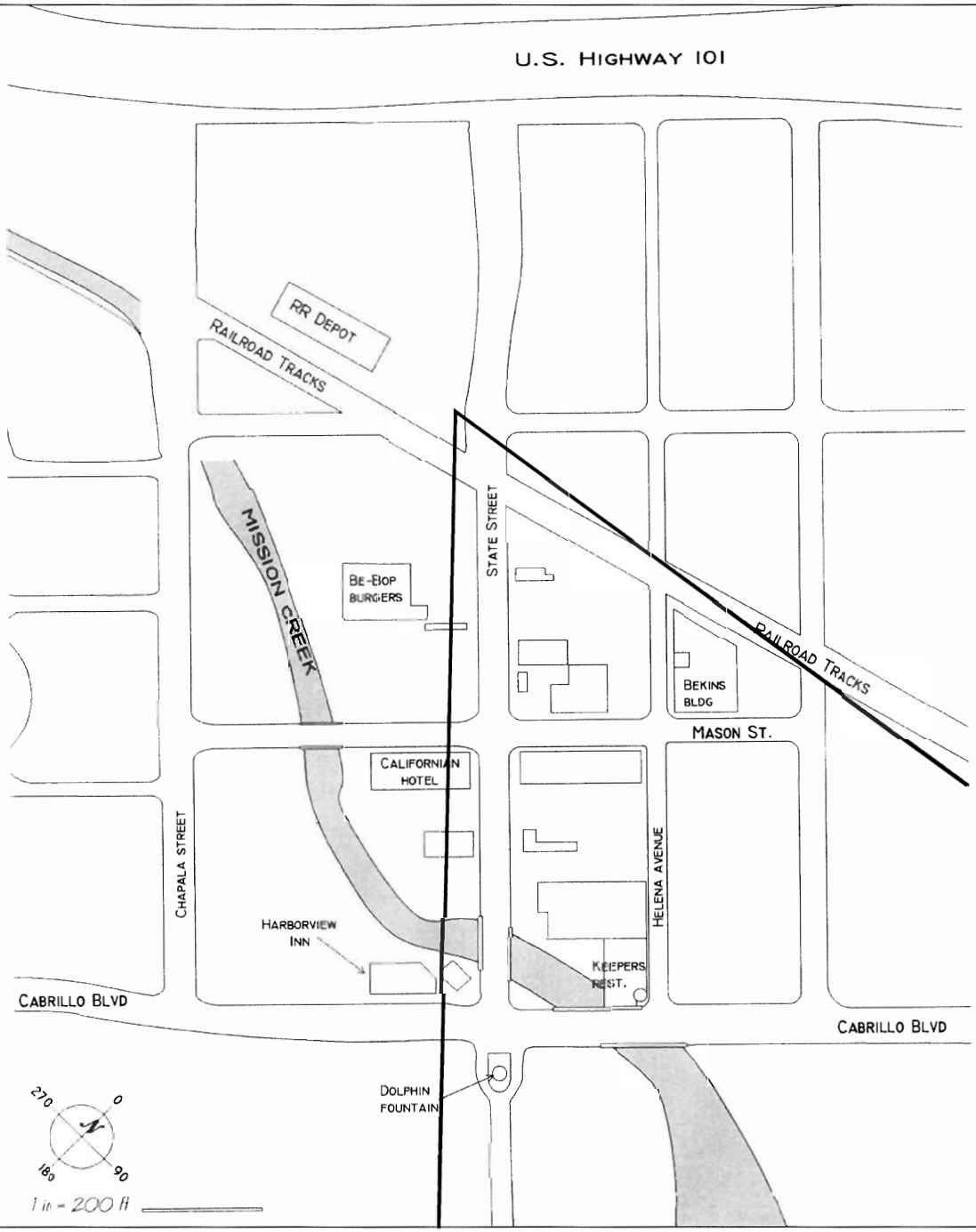


Figure 4-38. Overhead Point of View Diagram for View 11

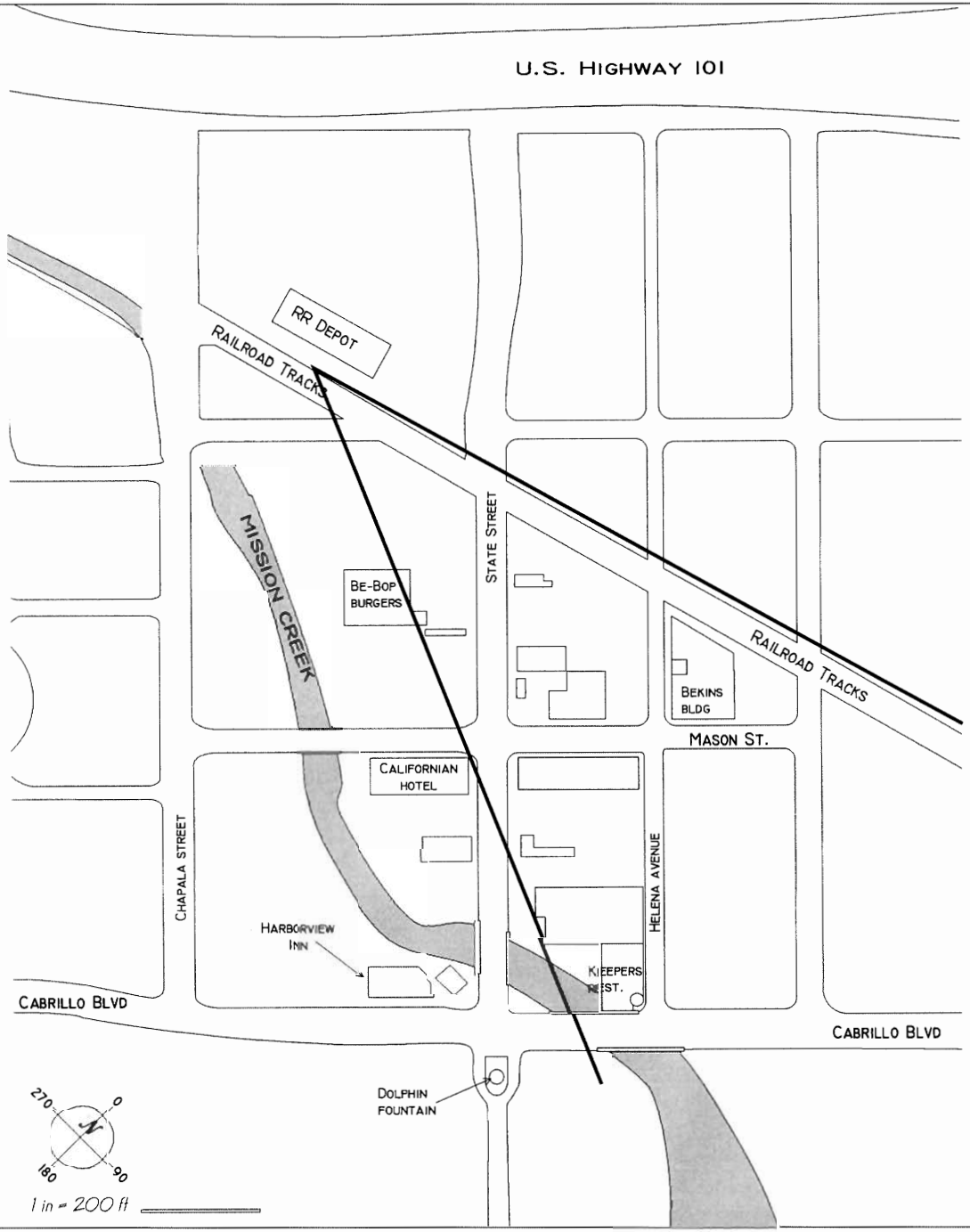


Figure 4-39. Overhead Point of View Diagram for View 12

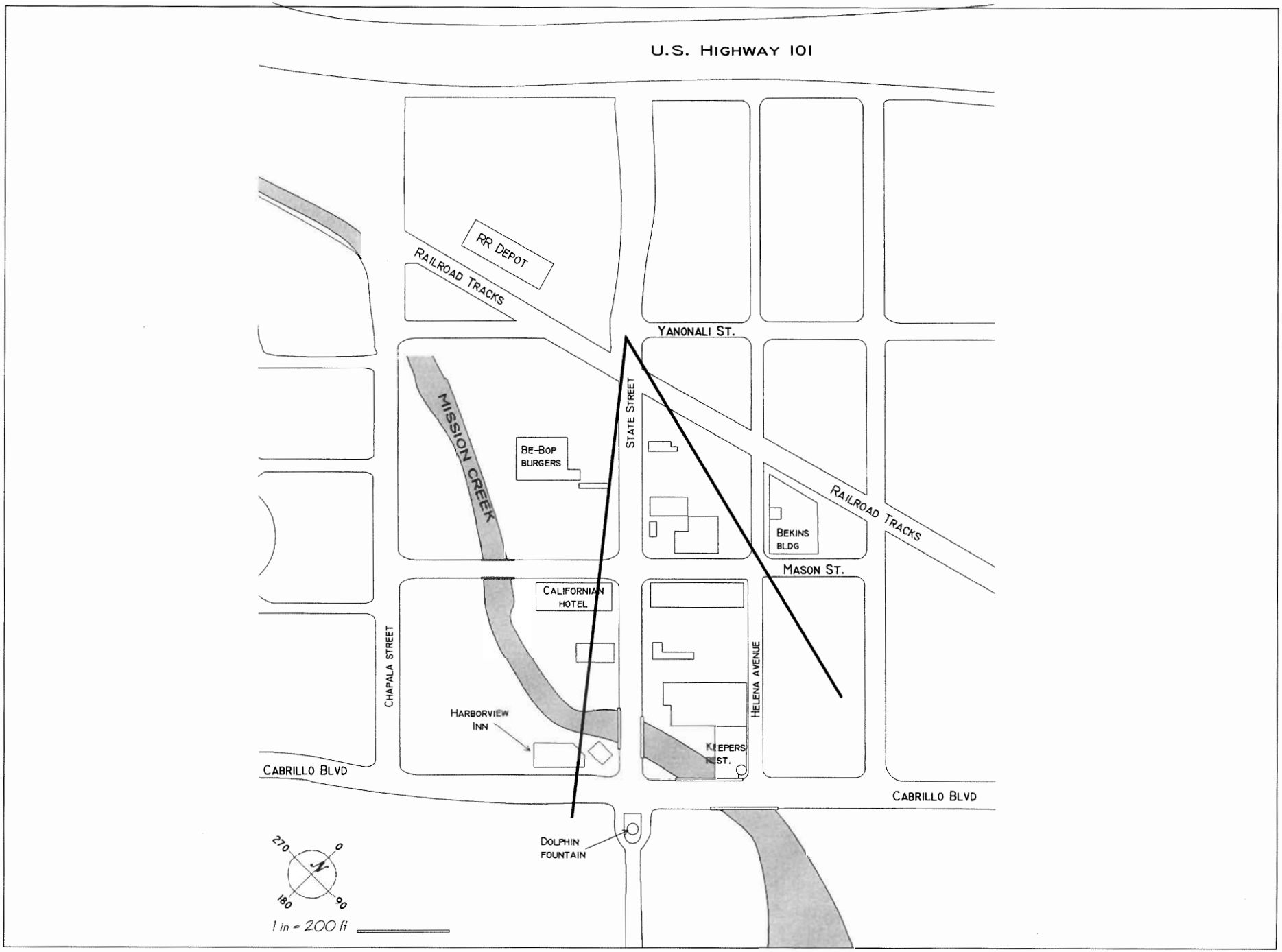


Figure 4-40. Overhead Point of View Diagram for View 13

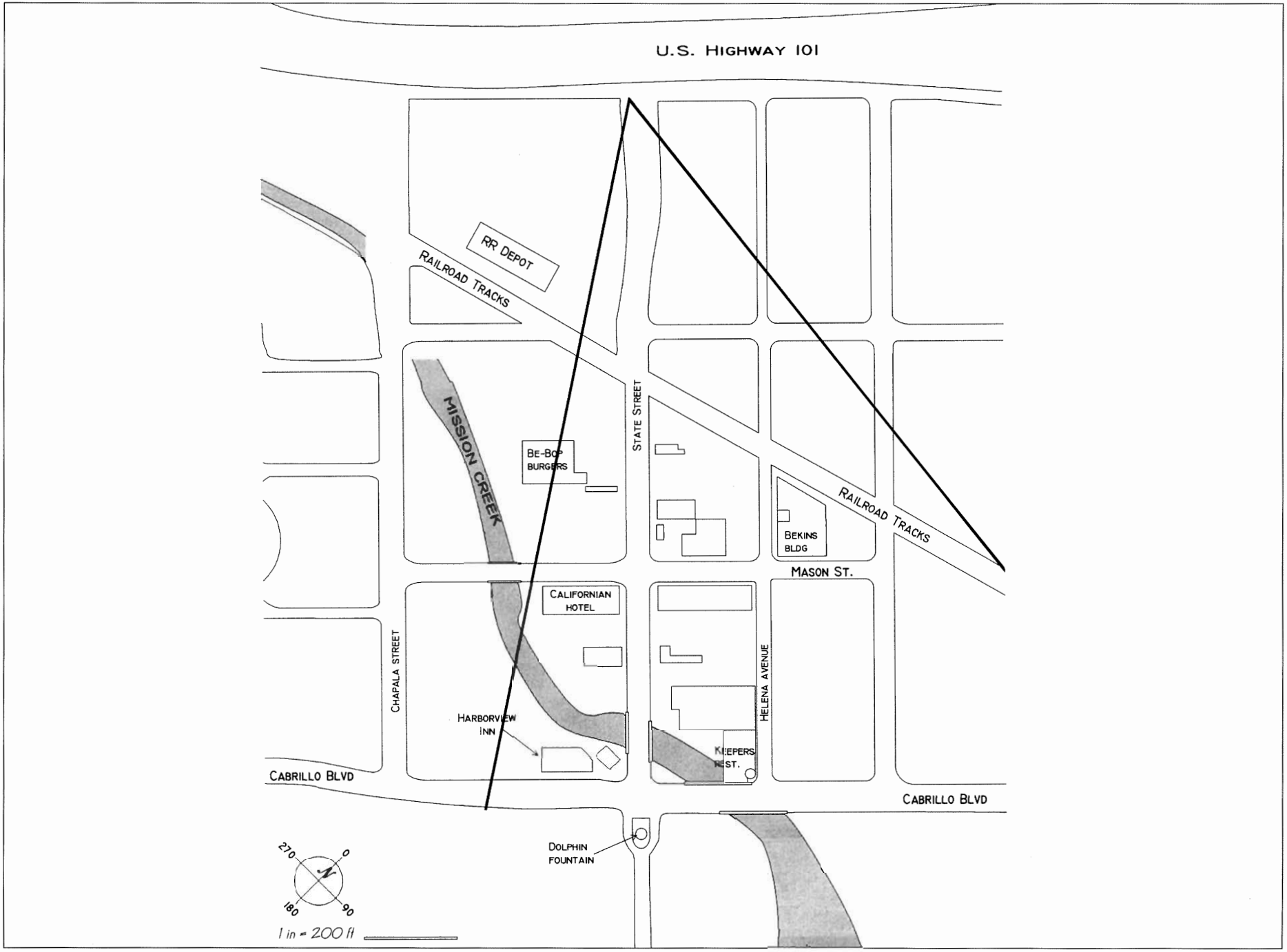


Figure 4-41. Overhead Point of View Diagram for View 14

Figure 4-42. Overhead Point of View Diagram for View 15

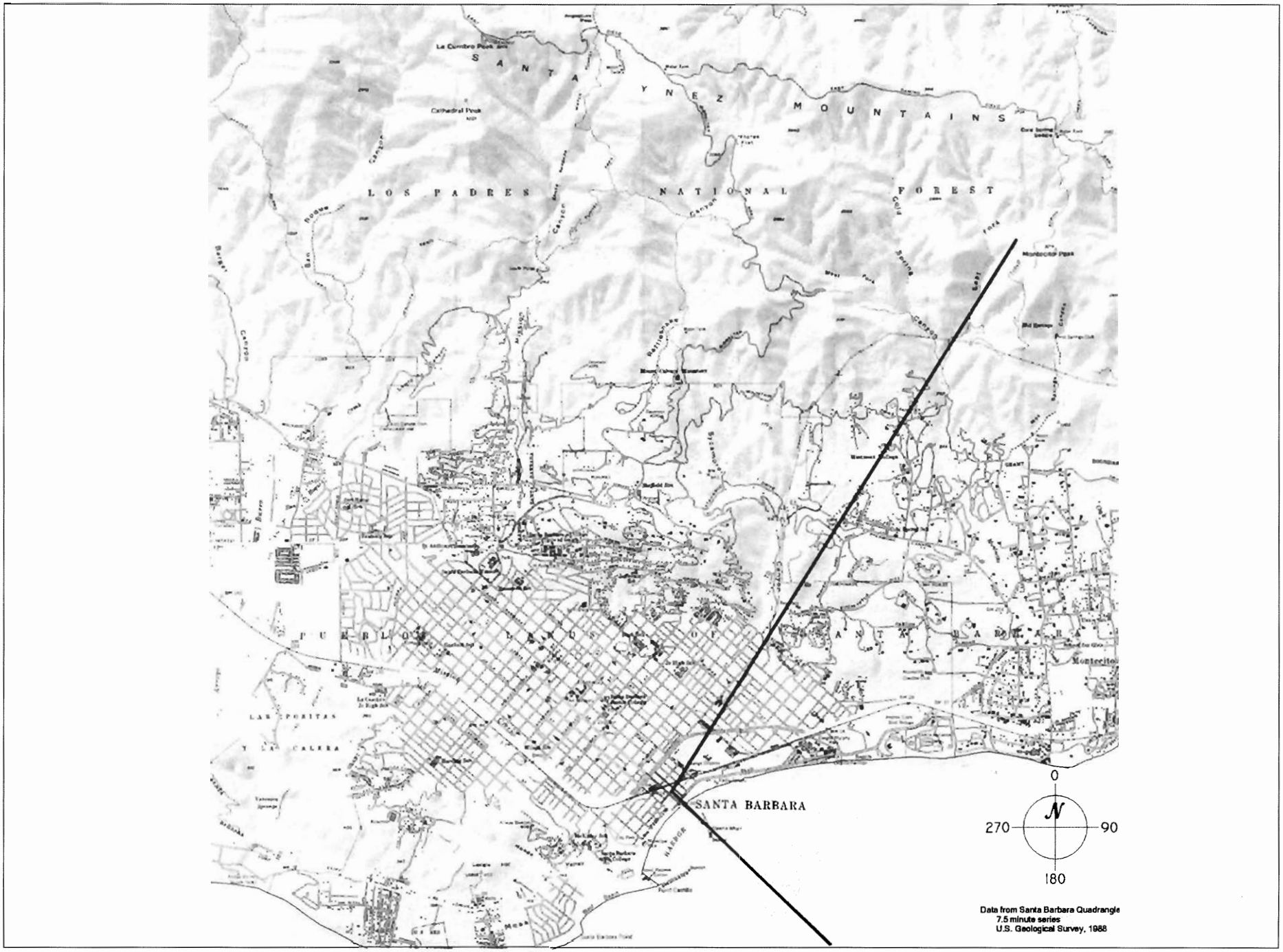


Figure 4-43. Overhead Point of View Diagram for View 16

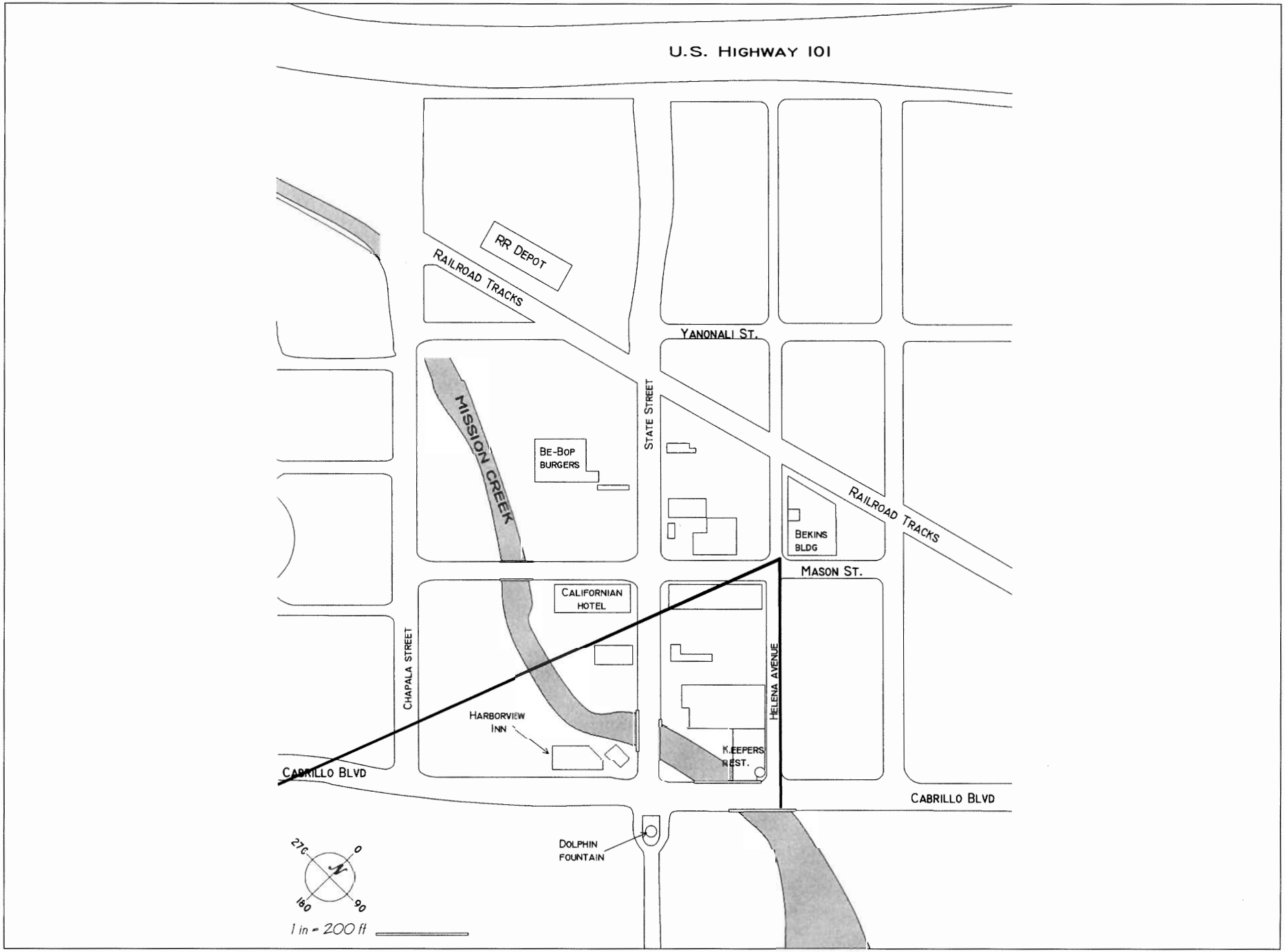


Figure 4-44. Overhead Point of View Diagram for View 17

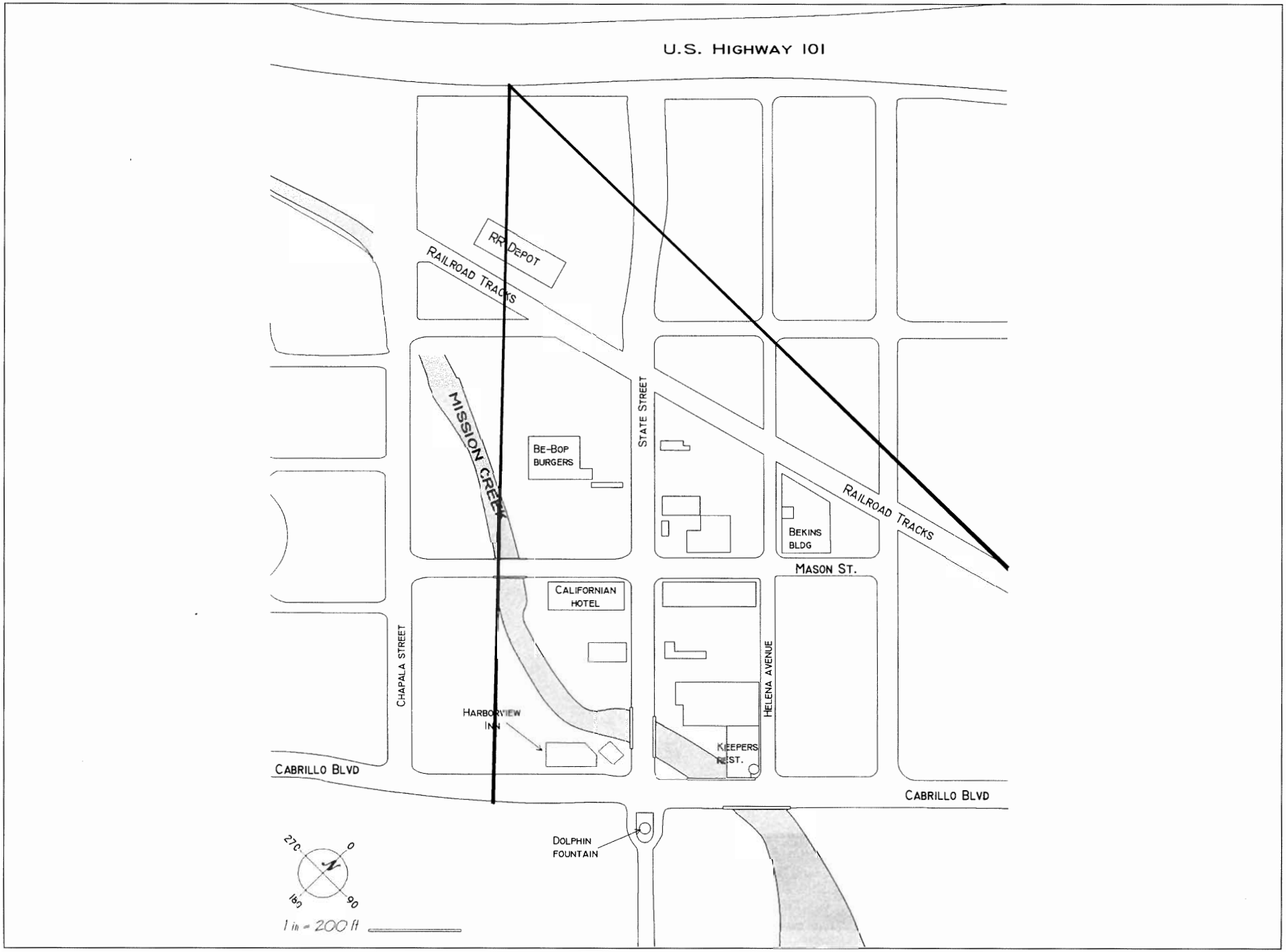


Figure 4-45. Overhead Point of View Diagram for View 18

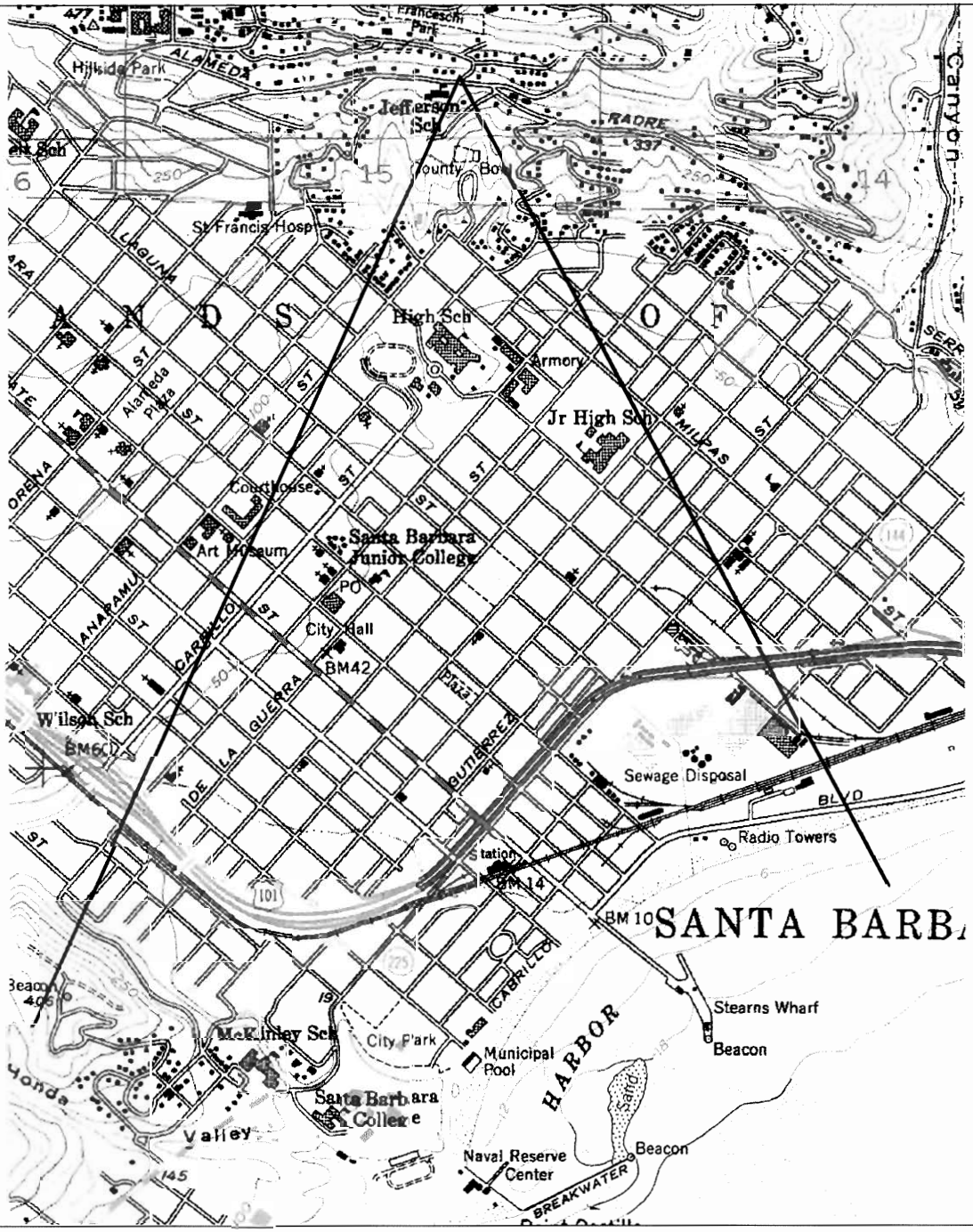


Figure 4-46. Overhead Point of View Diagram for View 19

5.0 PROJECT ALTERNATIVES

EIRs are required to examine alternatives to a proposed project including a "No Project" Alternative. The intent of this examination is to explore a reasonable range of different project designs (and potentially locations) that meet most of the basic objectives of the proposed project, while reducing the severity of significant project environmental impacts. *CEQA Guidelines* Section 15126 (d)(1) notes that "the discussion of alternatives shall focus on alternatives to the project or its location which 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." If there is an "environmentally superior" alternative to the proposed project, it must be identified. If the environmentally superior alternative is the No-Project Alternative, the EIR must identify an additional "environmentally superior" choice among the other project alternatives.

Alternative 1 is the No Project Alternative, as required by CEQA. No significant environmental impacts are identified in this EIR; therefore, no further alternatives analysis is required to reduce significant impacts.

5.1 ALTERNATIVE 1: NO PROJECT

Per CEQA Section 15126 (e)(3)(B), under Alternative 1, the Entrada project would not be developed. Section 15126 (e)(C) states that the No Project Alternative in an EIR should assess what would reasonably be 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. At this time, there is no other reasonably foreseeable action or proposal under consideration by others that would represent a consequence of the No Project Alternative requiring discussion in this EIR. In the absence of speculation, the No Project Alternative is assumed to be the maintenance of existing buildings along lower State Street, with perhaps continuing rehabilitation and upgrading of commercial and visitor serving facilities as has occurred in the past several years.

Under the No Project Alternative, existing important public scenic views as currently experienced from lower State Street would not be affected. No impacts would occur.

5.2 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Because the No Project Alternative would result in no additional development of the project site and would not cause any impacts on important public scenic views, it is considered the environmentally preferred alternative. Because no other alternatives were required to be analyzed in this EIR, the Entrada project is the Environmentally Superior Alternative other than the No Project Alternative.

This page intentionally left blank.

6.0 IMPACTS NOT FOUND TO BE SIGNIFICANT

As detailed in section 2.4, the Entrada de Santa Barbara project, prior to this EIR, has already undergone extensive environmental review. This earlier environmental review culminated in the adoption of a Mitigated Negative Declaration by the Planning Commission, upheld by the City Council. This Mitigated Negative Declaration concluded that, with the Project Description as it had evolved through the City's extensive public review process, and with the identified and expressly required mitigation measures, all potential environmental impacts from the Entrada de Santa Barbara project had been reduced to less than significant levels. However, a legal challenge was filed to the City's environmental and public review process and its adoption of the Mitigated Negative Declaration for the Entrada de Santa Barbara project as the appropriate environmental document.

In a judgment dated May 30, 2000, the Santa Barbara Superior Court concluded that a "fair argument" could not be made that the Entrada de Santa Barbara project might result in potentially significant adverse impacts to the environment with respect to the following five of the six environmental issue areas raised by the challengers: (1) traffic and circulation; (2) parking; (3) water and biological resources in Mission Creek; (4) state and City land use and Coastal plans and polices; and (5) the size and scale of the project and its compatibility with the area. The Superior Court expressly determined that both the City and the applicants had worked "extremely hard" to develop a good project and, as a result, the Court commended the City and the applicant for the good faith and "exhaustive efforts" to concentrate on the merits of the Entrada de Santa Barbara proposal and to develop a project which would be acceptable to the community. Consequently, the Court found that no further environmental analysis was required or necessary for these five issue areas. The adopted Mitigated Negative Declaration was deemed legally appropriate and approved for these issues by the Court judgment.

The Court concluded that a "fair argument" could be made that the project may have a significant effect on the environment (visual resources), and as such an EIR focused on visual resources was required, per CEQA Section 15070(a). As a result, the Court directed the City to vacate its approval of the Entrada de Santa Barbara project and to prepare a focused EIR with respect to the Project's potential for adverse effects on public views. The Court specifically found that this view concern could, and should, be severed from the other issue areas and that the Mitigated Negative Declaration was sufficient and approved with respect to the other areas and that the City's review was otherwise in full compliance with CEQA.

Therefore, based on the direction from the Court, along with the analysis and conclusions of the Initial Study and Mitigated Negative Declaration, all other environmental impacts were determined to be not significant.

In accordance with Section 15128 of the State CEQA Guidelines, the Second Revised Initial Study, and Final Mitigated Negative Declaration No. ENV97-0452 prepared for the project explain why the project would not result in significant environmental impacts in any of the following areas. The following issues are therefore not further addressed in this EIR, in accordance with CEQA and the Court judgement:

- Project Aesthetics (e.g., mass, bulk, scale, design, light/glare)
- Air Quality
- Biological Resources
- Cultural Resources
- Geophysical Conditions
- Hazards
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Circulation
- Water Environment

The Final Mitigated Negative Declaration No. ENV97-0452, including identified mitigation measures, is available for review at the offices of the City of Santa Barbara Community Development Department, 630 Garden Street, between the hours of 8:30 a.m. to noon and 1:00 p.m. to 4:30 p.m., Monday through Friday.

7.0 OTHER CEQA SECTIONS

7.1 GROWTH INDUCING IMPACTS

Section 15126 of the State CEQA Guidelines requires that an EIR discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth inducing impacts are caused by those characteristics of the project that tend to foster or encourage population and/or economic growth. Inducements to growth include the creation of construction and permanent employment opportunities in the support sector of the economy, or extension of public facilities, such as roads, sewer, and water.

The proposed project could generally contribute to the economic growth of the community, including commercial and tourist sectors. However, the project is not anticipated to have a substantial growth-inducing impact. The proposed project is located in a developed urban area, and as a redevelopment project, would not require extension of any major infrastructure other than normal utility service connections. As referenced in the Initial Study and Mitigated Negative Declaration No. ENV97-0452 (March 1999) prepared for the project, no significant impacts to population and housing are anticipated. The proposed project would employ approximately 79 employees, a net increase of seven employees over the estimated 72 employees associated with the existing uses. This net increase of seven employees would not have a significant economic impact or generate significant population growth or demand for additional housing (as referenced in June 24, 1999 Planning Commission Staff Report).

7.2 SIGNIFICANT UNAVOIDABLE EFFECTS

CEQA Section 15126 (b) requires that an EIR define those significant impacts that cannot be reduced to a less than significant level, resulting from the implementation of the proposed project.

As described in Chapter 1, this EIR is focused on important public scenic views. Other environmental issues, such as air quality, biological resources, cultural resources, geology, noise, traffic and circulation, water resources, public services, population and housing, noise, and hazardous materials have already been evaluated in a Mitigated Negative Declaration adopted by the Santa Barbara City Council in August 1999, and by the court on May 30, 2000. The analysis in this EIR found no significant unavoidable effects to public views.

This page intentionally left blank.

8.0 REFERENCES

8.1 REPORT PREPARATION

Science Applications International Corporation

David Stone, Project Manager

Meredith Clement, Assistant Project Manager

Forrest Smith, Publications Manager

Debby Baca, Graphics Manager

Cay FitzGerald, Graphics

Claudia Leufkens, Document Processing

Karen Stark, Document Processing

Videoscapes

Ken Doud, Photographer/Computer Simulations

City of Santa Barbara

Debra Andaloro, Project Planner, Community Development Department, Planning Division

William Jacobs, Associate Planner, Community Development Department, Planning Division

Barbara Shelton, Environmental Analyst, Community Development Department, Planning Division

Bettie Hennon, Acting City Planner, Community Development Department, Planning Division

8.2 PERSONS AND AGENCIES CONTACTED

Susan Van Atta. Van Atta Associates.

David Van Hoy. Artisan Studios.

8.3 LITERATURE CITED

American Planning Association. 1999. *Aesthetics, Community Character, and the Law.* Planning Advisory Service Report Number 489/490. Prepared by Christopher J. Deerskin and R. Matthew Goebel. December.

B3 Architects. 1999. *Entrada de Santa Barbara Architectural Site Plan.* June.

_____. 1999. *Entrada de Santa Barbara Area A, B, and C Exterior Elevations and Sections.* June.

California Department of Transportation (Caltrans). 2000. *California Scenic Highways Guidelines.* Caltrans Website: http://www.dot.ca.gov/hq/LandArch/scenic/shpg1.htm. Accessed September 4, 2000.

City of Santa Barbara Community Development Department. 1999. Final Mitigated Negative Declaration No. ENV97-0452, Entrada de Santa Barbara Project. July.

Santa Barbara City Planning Commission. 1999. Staff Report, Entrada de Santa Barbara 20-120 State Street and 15 East Mason Street. March.

Van Atta and Associates. 1999. Entrada de Santa Barbara Landscape Site Plan. June.

APPENDIX A

Waterfront Area Aesthetic Criteria for New Development Assessment

APPENDIX A

WATERFRONT AREA AESTHETIC CRITERIA FOR NEW DEVELOPMENT ASSESSMENT

Background

The Locating New Development Section of the Local Coastal Plan (LCP) provides for protecting, maintaining and enhancing the visual qualities of the City's Waterfront Area by establishing criteria to evaluate the appropriate intensity of potential development. These criteria area based on the visual resources which presently exist: openness; lack of congestion; naturalness; and rhythm. Policy 12.2 requires that the impact of new development be evaluated with respect to those resources. The policy further requires that the City develop objective criteria to assist decisionmakers in assessing the impacts of new development.

Waterfront Area

The Waterfront Area is the area south of U.S. Highway 101 between Pershing Park and the Harbor on the west and Milpas Street on the east. The area includes major recreational facilities including the Santa Barbara Harbor and Marina, Stearns Wharf and Chase Palm Park. The Waterfront Area also includes area designated for a wide variety of general and ocean-oriented industrial and visitor-serving commercial uses.

Evaluation Matrix

In accordance with Section 30251 of the Coastal Act, the scenic and visual qualities of the coastal areas are to be protected, restored and enhanced. Section 30252 requires that public access be maintained and enhanced. These parameters can be compared to the aspects of openness, lack of congestion, naturalness and rhythm. The decisionmaker in using this worksheet can evaluate a project's positive, negative, or indifferent aesthetic effect on the Waterfront Area's ambiance. Application of the following evaluation criteria will help in determining if a project protects, maintains and enhances visual quality.

Evaluation Criteria

The dimensions described below define each section illustrated on the Evaluation Matrix. These dimensions can be considered as increments or measures to gauge a particular development's aesthetic performance and its relationship with the surrounding neighborhood. This matrix is for use by the decisionmaker and the applicant/developer to determine on an individual and/or collective basis the project's aesthetic relationship to the Waterfront Area:

Dimensions

1. Openness. One of the special qualities of the Santa Barbara Waterfront is its sense of openness and freedom from clutter, with unimpaired views of the shoreline and mountains. The beaches are broad and enhanced by the presence of Chase Palm Park, the Andres Clark Bird Refuge, and predominantly one-story buildings on the north side of Cabrillo Boulevard.

Several dimensions of openness can be identified:

a. *Building Density, Scale, Mass, and Height.* In protecting, enhancing and re-storing openness, this dimension is the

most important. Each development, large or small, must be critically gauged as to its relationship with the surrounding neighborhood; essentially how well the project fits in. Buildings that provide setbacks and building separation promote the feeling of openness and allow views to the ocean. Stepping back the second and third stories from the edges of the property provides visual separation from buildings on adjacent properties that maintains views to the foothills and mountains.

Pedestrian orientation in building and site design is vitally important in promoting human scale. Buildings that open up to and are oriented to the pedestrian invite and promote the visitor-serving aspect of the Waterfront Area. The south side of Cabrillo Boulevard where there are public facilities provided promotes the feeling of openness and allows views to the ocean. The recently approved (not yet developed) Park Plaza Hotel project proposed on the north side of Cabrillo Boulevard provides in its design major building separations, view corridors and height limitations (one and two stories closer to Cabrillo Blvd. and limited three stories set back to the rear of the property) that will preserve views to the mountains and foothills and will maintain a scale that will protect, enhance and restore the feeling of openness in the Waterfront Area. The Ambassador Park area on the north side of Cabrillo Boulevard in the West Beach area provides a distinct view separation, promotes visual relief and views to the ocean and Harbor.

By contrast, portions of the north side of Cabrillo Boulevard are intensely developed and do not promote openness. The East Beach townhouses and the Mar Monte (Sheraton) Hotel are large, imposing structures which appear to intrude into the open space area. Such structures do not protect, enhance and restore the feeling of openness in the Waterfront Area.

b. *Functional Access.* A number of aspects facilitate being able to get to the Waterfront easily and contribute to a sense of openness. These include the absence of private property on the south side of the boulevard; convenience of parking along the boulevard, especially on the south side; the general absence of obstructions to and along the beach, though there are some notable exceptions (Stearns Wharf, Harbor facilities, art show on Sunday); and proximity to many residential neighborhoods.

c. *Land Use Patterns.* Several aspects of land use patterns support openness. The residential areas are compact, yet open and green. Neighborhood parks (e.g., Pershing, Punta Gorda) contribute to the feeling of openness, and complement the parks directly adjacent to the beach. Low scale commercial structures are in keeping with low scale residences. In a sense, the neighborhoods spill out and open onto the Waterfront, rather than being confined or blocked by heavy industrial uses or major arterial highways as in many urban areas.

d. *Vegetation.* The ultimate scale and mass of landscaping is an important consideration in maintaining openness. While there are many palm trees along Chase Palm Park, they enhance the openness and do not obstruct the overall views to the ocean and foothills. On the other hand, the treeline north of Cabrillo Boulevard on the Southern Pacific property blocks views to the foothills and mountains and may conflict with openness at that location. Hence, landscaping material should be carefully selected so that,

when mature, it enhances views and avoids blocking or hindering openness.

2. ***Lack of Congestion.*** The sense of openness in the Waterfront is unquestionably enhanced by a relative lack of congestion. With the exception of summer week-ends, one can still move freely along the beaches, bikeways, and Cabrillo Boulevard in relative quiet.

a. *Traffic Flow.* Traffic flow along the Waterfront has increased dramatically in all modes. Cabrillo Boulevard has all the attributes of a "grand boulevard." Motorists can drive along leisurely and enjoy the view, unimpeded by cross traffic or stop lights. Increased congestion, however, especially during summer weekends will degrade this feeling. Heavy traffic, hazards due to conflicts with bicycles and pedestrians crossing the boulevard, and the congestion in the vicinity of the art show, reduce the experience to the level of a four lane arterial during rush hour.

b. *Parking.* Parking on the south side of the boulevard interferes with the view, especially when the art show is in progress, and poses hazards to bicyclists and motorists. While more off-street parking may be desirable, its placement in parking lots on the beach clashes severely with the naturalness of the setting. The presence of autos, whether moving or parked, leads to a feeling of congestion.

c. *Public Facilities Planning.* The placing of public facilities along the Waterfront, rather than concentrating them in one or two locations, contributes to an uncongested Waterfront. The Harbor, however, is the exception. Here, parking lots stretch from Leadbetter Beach to the municipal pool, and are filled by an assortment of vehicles, including cars, boats, trailers, and RVs. This high concentration, while necessary for the Harbor to function, detracts from the openness and lack of congestion which should be achieved.

d. *Land Use Patterns.* While motels and other commercial uses add to congestion, their being mixed with residential uses helps distribute the intensity. Accompanying noise and congestion are also more evenly diffused helping to relieve localized concentrations of noise and intense activity.

3. ***Naturalness.*** The Waterfront's openness and lack of congestion are complemented by the natural setting in which Santa Barbara lies. Views to the foothills and mountains are still largely unimpeded by structures; in particular, the views from Stearns Wharf, Chase Palm Park, and East Beach offer unparalleled beauty. The coastal greenery and landscaping, the contour of the beaches and coastline in this area, and the sandy beaches all contribute to the strong image of Santa Barbara's natural beauty. These following dimensions form the basis for criteria which can be used to judge whether or not projects proposed for the Waterfront will uphold the quality of naturalness.

a. *Views.* Views are the most important dimension of naturalness. These views are to the ocean, other points along the Waterfront, and to the foot-hills and mountains. The contrast between the sweep of the coastline and the sweep of the mountains is especially dramatic and heightened by the linear elements of Chase Palm Park and Cabrillo Boulevard.

b. *Public Aesthetics.* The spacious and well-planned public facilities provide a calm contrast to the busy city for both residents and visitors. These facilities and public amenities

show that the people of Santa Barbara care, and that they have balanced economics with natural aesthetics. This is especially evident in the contrast between the north and south sides of Cabrillo Boulevard. While the north side is commercial, the south side is predominantly low density recreation and park space.

However, there are a number of points of concern that future developers must consider in working through the dynamics of this balance. The north side of Cabrillo Boulevard, especially from State Street to Pershing Park, warrants special consideration. While the Spanish motif helps to unify structural elements, there are other elements that should be considered to create a unity such as signing, lighting, detailing and color.

c. *Landscaping.* Landscaping enhances the feeling of naturalness of the Waterfront. A number of aspects of landscaping are important in promoting the feeling of naturalness. These include undeveloped landscaping, use of mature shrubbery and trees, as in Chase Palm Park, and the contrast of tall trees and low shrubbery.

d. *Adjacency.* Adjacency is an important dimension of naturalness. The parks and the beaches are adjacent to the Boulevard (e.g., East Beach, Leadbetter Beach). This promotes a sense of having natural wealth and beauty readily available.

4. Rhythm. The Waterfront has evolved slowly over the years, both resisting and accepting various patterns, both human and natural, which combine to create a richly dimensioned image of the Waterfront. There are daily patterns, the weekend-weekday contrasts, the sun, which both rises and sets on the Waterfront. There is the early morning haze which breaks by afternoon, the ebb and flow of people biking, skating, standing in lines for dinner. There is diversity in this rhythm, and care expressed by the diversity that exists. Rhythm is an extremely subtle resource quality, yet it gives strength to all the other qualities that characterize the Waterfront.

Rhythm includes the following:

a. *Diversity.* Diversity refers to the number of differences existing in the Waterfront. First, there are many things to do - driving, walking, biking, skating, eating, jogging, strolling through the art show on Sunday. Second, there is variety in the way these things can be done with facilities of different kinds and intensities to support these activities. Sometimes, however, these facilities are heavily used by conflicting activities, as is the bikeway at present. Third, there is social complexity. The Waterfront is not just a tourist mecca; people also live and work there. The Harbor in particular is a working harbor with both residential and commercial purpose.

b. *Use Patterns.* Diversity creates differences in use patterns, and use patterns themselves vary. It is important to note that there are patterns, rather than one stream of continuous activity. These differences in use patterns allow people to pick and choose the times and places for enjoying the Waterfront. Probably the most clear cut example of how differences co-exist and create their own rhythm is given by the art show. On Sunday, the art show adds excitement and provides a focal point for visitors and residents alike. By Sunday evening, and for the rest of the week, it has disappeared.

c. *Design Details.* Rhythm occurs spontaneously and is a normal outcome of diversity. Small details, however, modulate rhythms or suppress them altogether. Conversely, design can create rhythm by providing settings for new activities.

Parameters

The three (3) parameters; protects, enhances and restores, are further defined as follows:

1. *Protects:* This means that the dimensions are incorporated into project design to a degree that defends or guards against damage or injury to the existing ambience of the area.

2. *Enhances:* This means that the dimensions are incorporated into project design to a degree that raises to a higher degree, intensifies or raises the value of the visual qualities of the area.

3. *Restores:* This means that the dimensions are incorporated into a project design to a degree that returns to a state of soundness or vigor or normal condition the visual qualities of the area.

WATERFRONT AREA NEW DEVELOPMENT EVALUATION MATRIX

+ Means: Creates a Positive Effect
- Means: Creates a Negative Effect
0 Means: Neither a Positive or Negative Effect

DIMENSIONS		PARAMETERS		
		Protects	*Enhances*	*Restores*
Openness	Building Density, Scale and Mass			
	Functional Access			
	Land Use Patterns			
	Vegetation			
Lack of Congestion	Traffic Flow			
	Parking			
	Public Facilities Planning			
	Land Use Patterns			
Naturalness	Views			
	Public Aesthetics			
	Landscaping			
	Adjacency			
Rhythm	Diversity			
	Use Patterns			
	Design Details			

APPENDIX B

Waterfront Area Design Guidelines

APPENDIX B

WATERFRONT AREA DESIGN GUIDELINES

Areawide Guidelines

Landscaping: All developments should incorporate significant and/or skyline trees located on the site. Landscaping should be compatible with existing plantings both on the site and in the neighborhood. Landscaping should generally be formal in nature and in all cases it should complement the project design. The height and width of plants at maturity should be a consideration, especially where significant view corridors exist. Landscaping should be used to the maximum extent practical to screen parking, storage utility areas. Plants with low water and maintenance requirements are encouraged irrigation systems should be included.

Views/Viewshed: Policy 9.1 states that "The existing views to, from, and along the ocean and scenic coastal areas shall be protected, preserved and enhanced. . ." Cabrillo Boulevard, running the length of the Waterfront District is a potential State Scenic Highway. State, Garden and Castillo Streets are other important arterial streets in the Waterfront area. The vistas of the ocean, harbor and mountains from these major streets must be carefully considered, maintained and where feasible, enhanced. Maintaining appropriate building setbacks, providing view corridors, incorporating existing skyline trees and avoiding bulky, massive structures can protect and enhance these vistas.

Pueblo Viejo - Landmarks District: The Historic Structures Ordinance (Chapter 22.22) states that any structure constructed or altered on the exterior shall be compatible the Hispanic tradition as it developed in the City from later 18th century to the present. Emphasis should be on early 19th century California Adobe" and "Monterey Revival" styles and the "Spanish Colonial Revival" style of the period from 1915 to 1930.

Parking Lots: All parking facilities should be screened from view from public streets, the railroad tracks and adjacent properties (especially in mixed use areas). Parking is preferable in the rear of a parcel, especially if there is a rear alley, rather than between the street and the structure. Conjunctive use of parking by two or more complementary uses in encouraged in order to maximize the use of fewer spaces. Landscaping is extremely important to break up the expanse of parking areas. Skyline and canopy trees should be considered in those developments that are visible from the freeway or any major street.

Paseos: Santa Barbara's tradition of pedestrian lanes, or paseos, is a long one, carefully thought out public walkways planned into residential as well as privately-owned footpaths placed within commercial developments. New development should provide for paseos, where appropriate, and their maintenance, in recognition of Santa Barbara's tradition of pedestrian orientation combined with enjoyment of a unique environment.

Buffer: This classification is intended to signify the need for a separation between potentially conflicting uses or an area of transition between land uses not directly compatible. It is also intended to buffer proposed development from significant and sensitive areas such as Cabrillo Boulevard, the two creek and the railroad tracks. A dense landscape screen should be included along all buffer areas.

Equipment: Provision for mechanical equipment should be designed into all projects. Adequate space should be provided for future equipment given the possible uses of a building over its lifetime. Possible approaches include providing a concealed equipment well or screen on the roof, a parapet or a ground mounted equipment enclosure. Roof equipment should be painted out with the final roof color so that it will effectively disappear when viewed from the Riviera or other hillside areas of the City. If a vent pipe or other equipment will extend above the roofline and be visible from adjacent areas, these can be creatively incorporated into the design, e.g. combining pipes into a false chimney structure or adding caps to vents such as on several structures on Steam's Wharf.

Trash Areas: Trash facilities should be located to afford efficiency of access and operation without impacting adjacent properties and uses which are sensitive to noise. Trash areas should be planned as an integral part of a project, with the detailing and materials of the structure reflecting the project's overall design.

Lighting: The amount of lighting should be enough to allow for safety and security, but carefully placed to avoid impacting adjacent properties and uses, especially residential. The design of the light standards and fixtures should relate to the remainder of the project.

Signage: All signs should be included as an integral part of a project reflecting the design of the buildings and the proposed use.

Hotel and Related Commerce I and 2: Architecture: Given that most of the HRC Zone coincides with El Pueblo Viejo, the traditional Hispanic style of architecture is appropriate in this area. The Monterey style should be emphasized in the vicinity of State Street and Cabrillo Boulevard.

Landscaping: Generally formal emphasizing Mediterranean plants. Street trees are important. Special emphasis should be placed on landscaping in the front yard setback along the street.

APPENDIX C

Local Coastal Plan Visual Resources Map

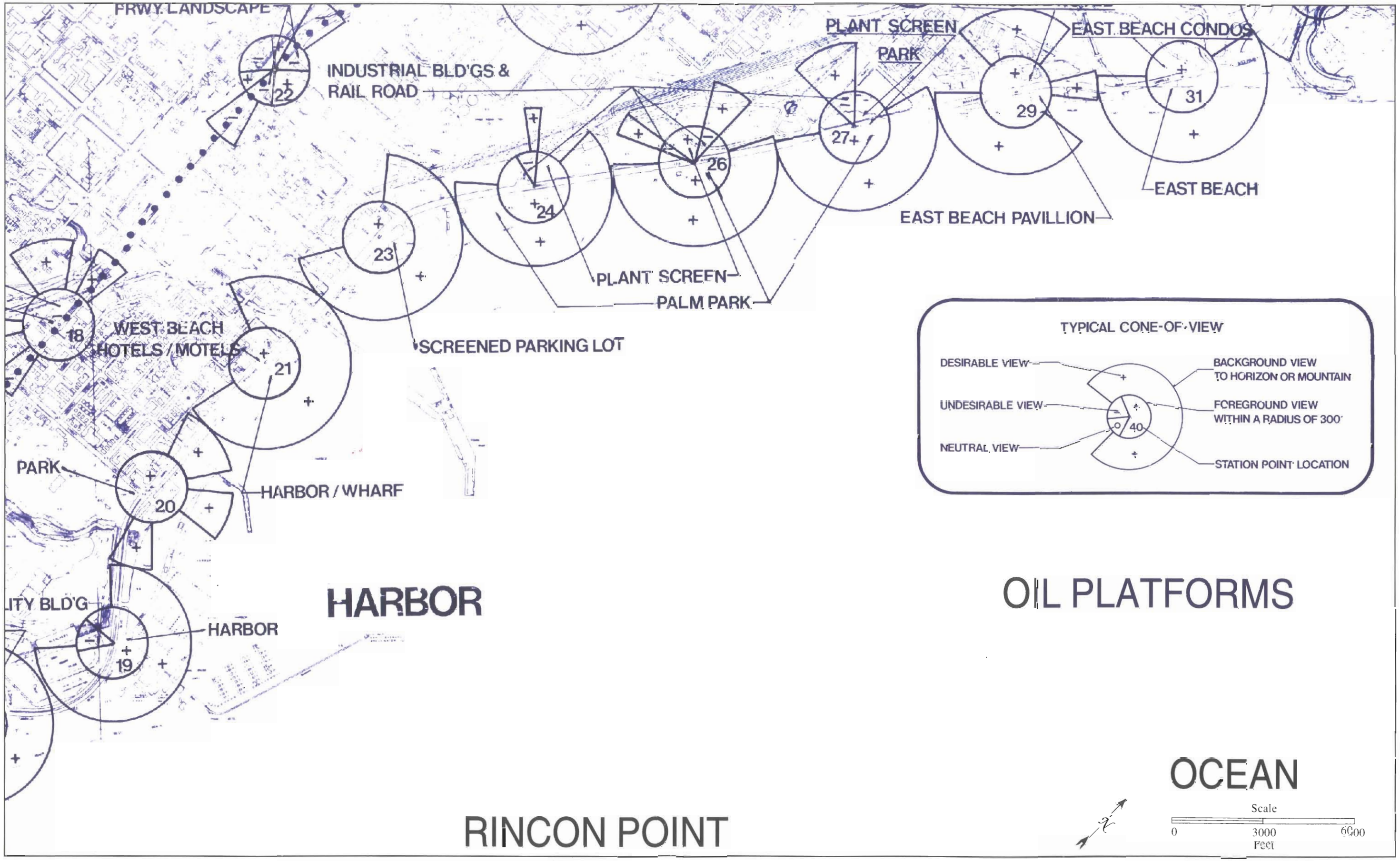


Figure C-1. Local Coastal Program, Visual Resources Map

APPENDIX D

Photographic Simulation Methodology

APPENDIX D

PHOTOGRAPHIC SIMULATION METHODOLOGY

Photographic simulations for this project relied on computer models depicting both the existing site and buildings that would be constructed as part of the proposed project. A model of the existing site was created using drawings provided by the firm of Penfield and Smith and by measurements taken in the field. The roads, buildings, and other objects in the existing site model are not detailed, but they are dimensionally the same as their counterparts in the real world. They therefore accurately depict those features that would be experienced by the viewer at viewpoints adjacent to the Entrada project site.

The computer model of the proposed project expands upon the existing site model. Proposed structures of the Entrada project are "inserted" relative to the existing buildings. The model of the proposed project is highly detailed and is colored so that it matches the intended look of the finished project as closely as possible. Landscaping elements are shown in their proper positions in a "mature" state. This is determined as best as possible by consulting references, such as the *Sunset Western Garden Guide* and by observing the performance of like species near the site.

The next step in the photographic simulations is to acquire the base photographs. A digital camera with single lens reflex mechanism was used. The lens was set such that no there would be no magnification or reduction of the normal human view, equivalent to a 50-55 mm lens. When the base photographs are taken, information about the exact position of the camera is recorded, including the location, height, bearing and tilt. For these simulations, the camera was attached to a tripod raised 5.5 feet in height. This height is used to simulate the height and perspective of an average pedestrian viewer as they would pass by the Entrada project site. Later, measurements recorded from the field camera are input into the computer which duplicates the position and orientation of the field camera in a model of the existing site. Figure D-1 shows the base photo for View 17. The white lines appearing on the base photo are the "wire frame" representations of the existing site buildings. To ensure that the computer model view is aligned with the field camera, the "wire frame" of the base photo is compared with the "wire frame" of the existing site model.

Using the computer model, aligned correctly for the base photograph, a simulation of the proposed project is overlain on the base photograph. The lighting that the computer simulates to illuminate the model is made to match the lighting in the base photograph as closely as possible. The images that result from these procedures are intended to provide a representation of the future that is reasonably realistic to permit useful evaluation of the project's visual impacts.

To create certain oblique views of the Entrada project from lower State Street viewpoints, it was necessary to broaden the image presented in some photos and photo simulations. The resulting photograph is more realistic, because it represents a broader field of view that most closely replicates the visual experience of a viewer with stereoscopic, peripheral vision. The broadened photos and photo simulations best represent the actual visual experience as viewers continuously turn their heads to take in a sweeping view at a particular viewpoint. These broadened images were done by "stitching" several base photographs together. Stitching is a term applied to the process of combining

and overlapping several photographs to create a more panoramic view than a single shot would encompass. It is preferable to wide angle shots because there is less distortion and it is easier to align the computer model with undistorted images. The bottom image of Figure D-1 shows the photographs that were combined to create the base photo for View 17. Because they were made by rotating the camera on its tripod in the field, the virtual camera of the computer model must also be rotated. In the uppermost image of Figure D-1, it is possible to see grey vertical lines that demarcate the different pictures the computer made of the wire frame model. If the computer camera were not rotated, the model would not line up with the base photo.

"Wire Frame" of the Base Photograph, View 17

Images Combined to Create the Base Photograph, View 17

Figure D-1. Illustrations of the Computer Photo Simulation Methodology

APPENDIX E

View Angle Analysis

APPENDIX E

VIEW ANGLE ANALYSIS

In April 1999 Penfield and Smith Engineers analyzed and documented the view sightlines to the mountain range from the Entrada de Santa Barbara site (the "View Angle Analysis"). As depicted in Figure E-1, the analysis established the compass direction to the major mountain peaks from the centerline of State Street. The distance to the ridge of each major peak and the altitude of each major peak was documented. A profile section drawing was then generated for each major peak utilizing database information from the United States Geologic Survey (see Figure E-2).

The View Angle Analysis documented that view angles from the Entrada site to the mountains vary from 2.3 degrees to 7.8 degrees above horizontal. The view angle is established by the height of the mountain and its distance from the viewing point. The higher the mountain and the closer the mountain is to the site, the steeper the view angle. The steepest view angle of 7.8 degrees is toward Gibraltar Peak, which is 3,750 feet high and 5.16 miles away. The analysis established that the view angle of the entire mountain range is 7.8 degrees above the horizon.

Therefore, the View Angle Analysis established that the entire view of Gibraltar Peak (and any lower views) would be blocked if any improvements were constructed on the east side of State Street, the height of which were equal to, or taller than, a view angle of 7.8 degrees. A view angle of 7.8 degrees is equal to a 16 foot 8 inch tall structure which is set back 20 feet from the property line fronting State Street.

Therefore, if a 16 foot 8 inch structure (a typical one-story commercial building in downtown Santa Barbara is 16 to 18 feet tall) were to be constructed in Area B or C of the Entrada site, with a 20-foot setback from the State Street property line, it would totally block the view of the Santa Ynez Mountains from the southwest sidewalk of State Street. This conclusion is demonstrated today by the existing one-story building located at 36 State Street (the "Hot Spots") building.

The View Angle Analysis quantifies the benefits of the view corridor concept that has been incorporated into the Entrada project design. Actual view corridors through the Entrada project open up legitimate views to the mountains, whereas the construction of a one-story structure in compliance with the setback requirements would not create or allow for views of the mountains.

This page intentionally left blank.

Source: Penfield & Smith Engineers

Figure E-1. View Sightlines to the Santa Ynez Mountain Range from the Entrada Project Site

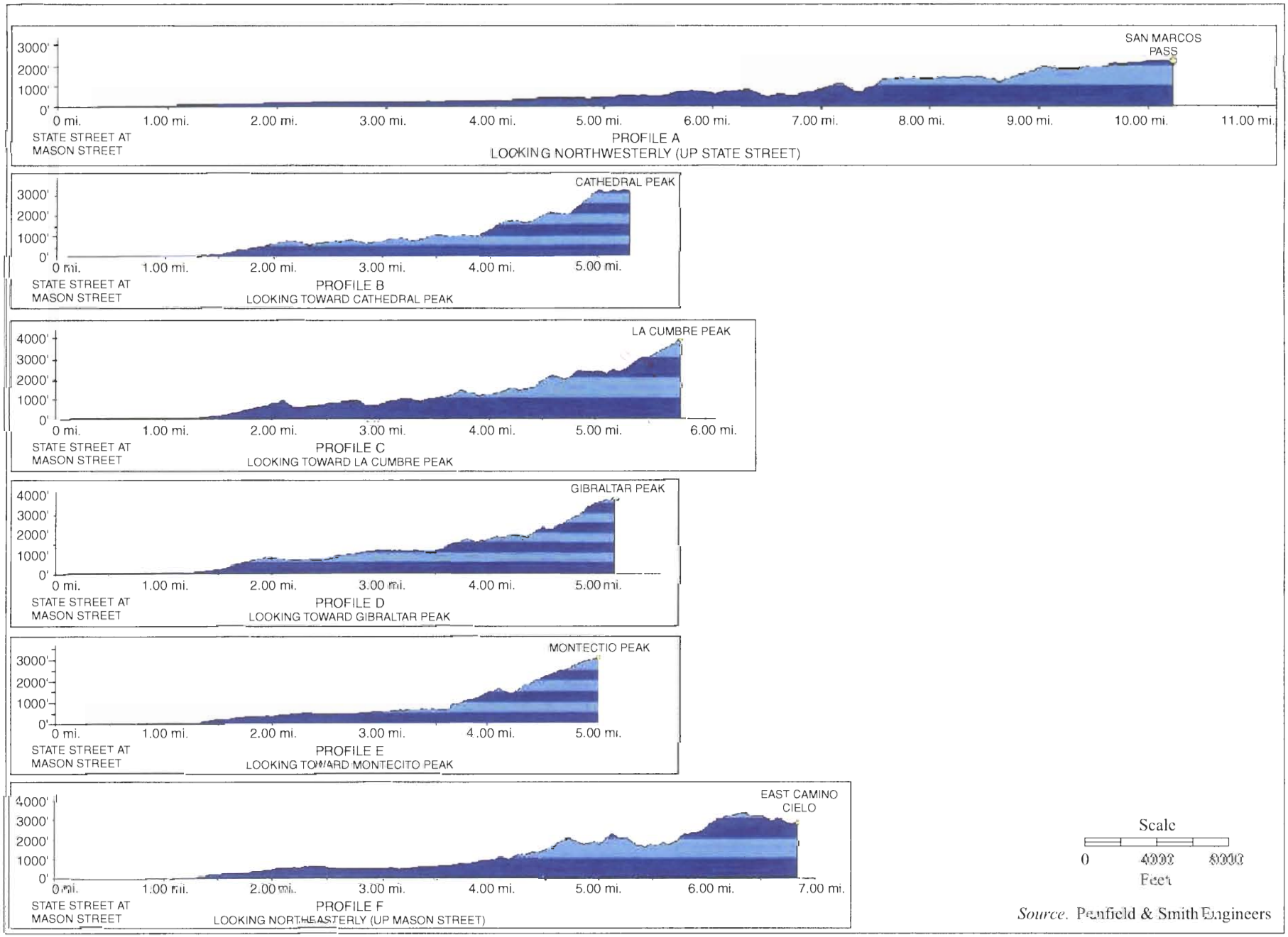


Figure E-2. Profile Sections Between the Entrada Project Site and Major Santa Ynez Mountain Peaks

APPENDIX F

Public Comments and Responses

APPENDIX F
PUBLIC COMMENTS AND RESPONSES

This section includes those comments received during the draft EIR public review period and responses to comments regarding the EIR analysis. The comments are grouped by organizations first, followed by individuals. The letters are listed chronologically in order by which they were received; each separate comment is identified by a letter in the text margin. Responses to comments follow each of the comment letters.

Letter Code	*Date*	*Letter*
A.	3/2/01	Streets R Us
B.	3/15/01	League of Women Voters of Santa Barbara, Inc.
C.	3/15/01	Citizens Planning Association
D.	3/15/01	Streets R Us
E.	3/20/01	League of Women Voters of Santa Barbara, Inc.
F.	3/22/01	Environmental Defense Center
G.	3/15/01	Lawrence Headley & Associates
H.	3/23/01	Citizens Planning Association
I.	3/23/01	Governor's Office of Planning and Research, State Clearinghouse
J.	No Date	Lorraine C. Rollin
K.	2/05/01	Mariette Risley
L.	No Date	Karen Schapansky
M.	2/18/01	Larry Crandell

Letter Code	*Date*	*Letter*
N.	2/23/01	Rosemary White
O.	2/23/01	Fred Keller
P.	3/05/01	Walter E. Hopmans
Q.	3/02/01	Nyle Utterback
R.	3/06/01	Jim Kodak
S.	3/04/01	John and Sandra Allen
T.	3/07/01	Elizabeth Donati
U.	3/08/01	Martha Santrizos
V.	2/28/01	Reggie Drew
W.	No Date	Eleanor Sorinson (?)
X.	3/07/01	Charles Hanson
Y.	3/07/01	Marcie Crandell
Z.	3/08/01	Peter C. Jordano
AA.	3/11/01	Leslie Crandell
BB.	3/11/01	Nicole LeBlanc
CC.	3/07/11	Lee Moldaver
DD.	3/11/01	Paul Norton
EE.	3/12/01	Reggie Drew

Letter Code	*Date*	*Letter*
FF.	3/12/01	Mr. & Mrs. Stephen Petersen
GG.	3/07/01	K. Kassity
HH.	3/13/01	Bonnie Alexander
II.	3/10/01	Albert Eichstaedt
JJ.	3/12/01	Mr. & Mrs. A. Toye
KK.	3/12/01	Maria Rabatin
LL.	3/12/01	Kathiann Brown
MM.	3/14/01	Gregory Tice
NN.	3/12/01	James B. Rickard III
OO.	3/14/01	Kae Mori
PP.	3/15/01	Ann Fenton
QQ.	3/15/01	Catherine S. Walker
RR.	3/15/01	Stuart Farber
SS.	3/15/01	George Relles
TT.	3/14/01	Tanny Keeler
UU.	3/15/01	Dale Ferguson
VV.	3/15/01	Claudia Madsen
WW.	3/16/01	John Varner

Letter Code	*Date*	*Letter*
XX.	3/15/01	W.A. Obers
YY.	3/16/01	Kay Woolsey
ZZ.	3/20/01	Pete LaFollette
AAA.	3/20/01	Sue Higman
BBB.	3/20/01	Jennifer H. Scott
CCC.	3/18/01	John M. and C. Barbara Johnson
DDD.	3/18/01	Janice J. Dependahl
EEE.	3/18/01	Derry Godar
FFF.	3/20/01	Joel and Vasanti Fithian
GGG.	3/19/01	Joan L. Jennings
HHH.	3/20/01	Ralph Fertig
III.	3/22/01	Laura Hout Mayer
JJJ.	3/22/01	Allegra Heidelinde
KKK.	3/22/01	James E. Marino
LLL.	3/19/01	Kae A. Mori
MMM.	3/23/01	Dudek & Associates
NNN.	No Date	Tom Becker
OOO.	3/22/01	Elizabeth T. Perelli

Letter Code	*Date*	*Letter*
PPP.	3/23/01	Steve Dunn
QQQ.	3/23/01	Benita Crane
RRR.	3/23/01	Trevor Martinson
SSS.	3/23/01	Paul C. Lamberton
TTT.	3/23/01	Margaret Searer
UUU.	3/23/01	Betsy Cramer
VVV.	3/23/01	John R. Barron
WWW.	3/23/01	Dr. John Kunz and Joy Kunz
XXX.	No Date	Deborah Slaght
YYY.	3/23/01	Petition to Santa Barbara Planning Commission and City Council
ZZZ.	3/15/01	Public Hearing Comments, City Planning Commission Meeting

Santa Barbara Streets R Us Committee
135 Chapala Street
Santa Barbara, CA 93101
www.StreetsRUs.org
info@streetsrus.org
805-957-1024

March 2, 2001

To: City of Santa Barbara Planning Commission
From: Streets R Us
Re: Petition Drive and La Entrada Project

Dear Commissioners,

A-1 This letter is a formal request from the Streets R Us committee, and from over 90% of the folks that have signed our petitions and that call Santa Barbara home, to do the following: 1) do not include the narrowing of State Street from Cabrillo to the train tracks in the La Entrada project; 2) reduce the size of the project so that the impact on views is not significant in our eyes; and 3) change the scope of the project so that it reflects the needs of our residents and not the tourists who come here anyway.

A-2 Our petition drive has obviously required our group of volunteers to be out among the public since the end of November. To date, we have collected over 5700 signatures. Even though the initiative itself deals with putting the narrowing of the specific streets in question on a ballot, it is clear that the folks who have signed the petition are doing so because they do NOT wish those streets, particularly lower State Street, narrowed. (There have been a small handful of folks who don't have an opinion either way and just wish to be able to vote on the subject and a few who want the whole street closed or narrowed and also want to be able to vote on it.)

A-3 The most common comment we hear every day from the public concerns their view of Santa Barbara's elected officials — "They don't care about us or Santa Barbara and they don't care what we want them to do. They just do what they want, regardless."

A-4 The most commonly held public opinion is that narrowing lower State Street in conjunction with the La Entrada project is a huge mistake. It is totally illogical to take an extremely necessary road and narrow it. They want it left wide. They don't have any problems with wider sidewalks but they do object to the city taking that sidewalk space out of 'their' much needed street. They, like Streets R Us, are concerned with the increased congestion, emergency vehicles and access and numerous other concerns. We are aware that several members of the City Council and the Planning Commission agree that the road should not be narrowed or at least question the concept. Many residents have suggested trying the idea out at the very least. Put up cones or some other form of temporary blockade to determine the effect on the traffic of narrowing lower State Street, and do it for at least 2 weeks when this area is busy with tourists to determine its feasibility. At least that way, if it doesn't work, we can say we tried it and move on to some other way to deter traffic without Mr. Levy spending his money on an idea whose merits are highly questionable.

A-5 In addition, most of the residents that we've talked to feel that building time-shares in our waterfront is a waste of precious beach-front resources that they themselves would love to enjoy. We've heard over and over again how people would love to rent an apartment or condo by the beach to live there year round so they can enjoy on a daily basis what the tourists come here to enjoy on the weekend. Most agree that the area surrounding the La

A-6 Entrada project needs cleaning up a bit and several have mentioned the tall white building that detracts from the views. Perhaps two story apartments could replace the eyesore and remove the blockage of the mountain view.

A-7 In regard to the E.I.R. on views, we can't tell you the outrage that we have heard since the first article came out in the NewsPress a month ago with the before and after photos of the La Entrada project superimposed on the current view. The public is appalled that the EIR, whose own photos clearly show the obvious blocking of the mountain views in the majority of view perspectives, came back with the opinion that this was "not significant." Since the release and printing of that piece, we get calls almost daily from residents who are so angry they don't know what to do. We tell them to write letters to you and to show up at the meetings. Many express frustration at that point because they are simply unable to make it to a meeting which is held during the day. The comments we're getting while out collecting signatures for the initiative have escalated and turned to anger, frustration and mistrust of our government. Again, the only thing we can suggest is letters and meeting attendance.

A-8 While it is Mr. Levy's right as a property owner to develop his property, it is your responsibility as our elected officials to make sure the development of that property follows Santa Barbara and the Coastal Commission's strict guidelines with regard to views, impact, traffic, pollution, and proper use for the community. This project is simply too large in scale for our small community. The residents would like to keep what's left of Santa Barbara as quaint as possible and maintain what is left of the waterfront for themselves. We urge you to take a closer look at this project and what it means to your entire community. We urge you to go out among the public and ask for feedback and listen to what your residents are saying. We think you would be surprised.

Elisabeth Donati

Elisabeth Donati
Chairperson

Streets R Us, Elizabeth Donati, March 2, 2001

A-1. Please see responses to your individual comments below.

A-2. The Santa Barbara Superior Court has determined that the previously prepared Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project except for potential impacts on public scenic views. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

A-3. The comment does not address the adequacy of the EIR. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the project's land use and design merits.

A-4. Please see response to comment A-2. Although the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500-foot-long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing does not reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free-flow roadway capacity changes from approximately 2,800 to 1,400

vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when many pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at level of service (LOS) B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

A-5. The comment does not address the adequacy of the EIR. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the project's land use and design merits. In addition to the fiscal constraint to housing development due to high land values in the coastal zone, per direction of the Coastal Act and Coastal Commission, City zoning for the area has to designate the area for specified types of coastal uses, focused on visitor-serving and ocean-dependent commercial types of uses. The City has a long history over past decades of trying to include housing in the mix, and in fact housing was previously proposed on the parcel, but the Coastal Act and Commission have not considered housing to be a high priority for use of limited coastal resources.

A-6. The Bekins Storage building is not a component of the proposed project. Although it has been considered in the description of the surrounding existing setting, it is not subject to the impact analysis resulting from implementation of the proposed Entrada project. Therefore, comments on the aesthetic character of this structure is outside the scope of the EIR. No significantly adverse impacts on public views were identified by the analysis. As such, no project alternatives are required to be analyzed in the EIR to minimize impacts on public scenic views. City decisionmakers may determine that additional project modifications are needed to find the proposal consistent with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and the City's Local Coastal Program policies. Please see the Executive Summary, Areas of Known Controversy and Issues to be Resolved.

A-7. The comment disagrees with the DEIR findings regarding significance of project view impacts. This opinion will be forwarded to City decision makers for their consideration.

A-8. The comment does not identify a specific concern regarding the adequacy of the EIR. The comment expresses the opinion that the project is too large, and concerns regarding views, traffic, pollution, and land use. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

LEAGUE OF WOMEN VOTERS OF SANTA BARBARA, INC.

1217-A De La Vina Street
Santa Barbara, California 93101
TEL/FAX (805) 965 2422
e-mail: lwvsb@silcom.com
www.lwvsantabarbara.org

STATEMENT TO CITY PLANNING COMMISSION ON MARCH 15,'01

Subject: La Entrada Draft Environmental Impact Report

I am Beverly King, speaking for the Santa Barbara League of Women Voters.

B-1 We have reviewed the new Draft Environmental Impact Report (EIR), which was prepared in response to the Superior Court order. We are disappointed with it, and recommend that it be revised. There are several reasons for this recommendation.

B-2 To begin, the photographs present good pictorial evidence of the project's effect on views, but the staff's conclusions do not follow from the evidence. There were many photos taken of views that were never in question and show little or no impact, as everyone would have expected. But there are at least five

B-3 central viewpoints from which the scenic views would be almost totally lost, and from which the project would present an overwhelming presence. This,in one of the most heavily used and important pedestrian sites in the City. To call these losses "less than significant" is indefensible, and prohibited by our local General Plan and Coastal Plan policies. They are significant to everyone who passes this way.

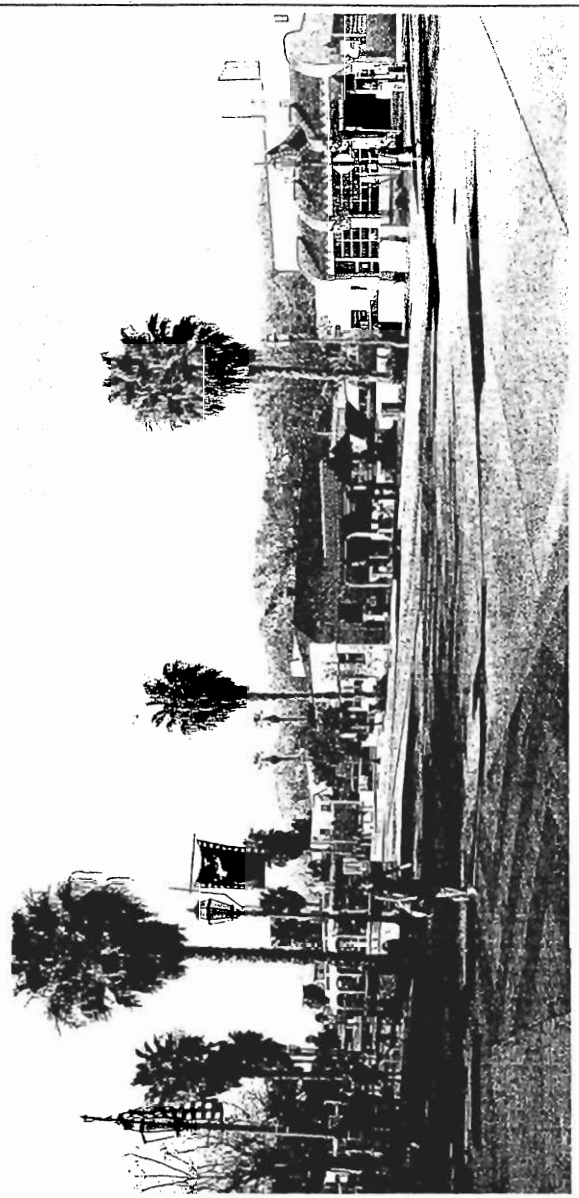
B-4 Our view expert, Mr Headley, has confirmed that these important scenic views will indeed be impacted. So the major conclusion of this EIR must be revised. And when that is done, then alternatives to the project must be developed, showing how the views can be preserved. On Page 4 of the current staff report, staff has described how this can be done: " Specifically, at the point that the Entrada project is before the Planning Commission for its Development Plan and Coastal Development permits, the City staff may choose to recommend and the City Planning Commission may consider imposition of conditions of approval which require additional size, bulk and scale reductions, particularly with respect to certain third story elements of the Project Areas B and C." We think that would be very beneficial, and combined with a decision to leave State Street at its present width and with enlarged sidewalks extending onto the project property, you would meet many of the public's concerns. After that, mitigation measures will have be included to effect changes. All of this is essential to a complete EIR.

B-5 The League does not understand why this EIR does not address any of the new information that we asked to have included at the scoping hearing, as CEQA requires. We particularly asked for analysis of any new City evacuation plan for

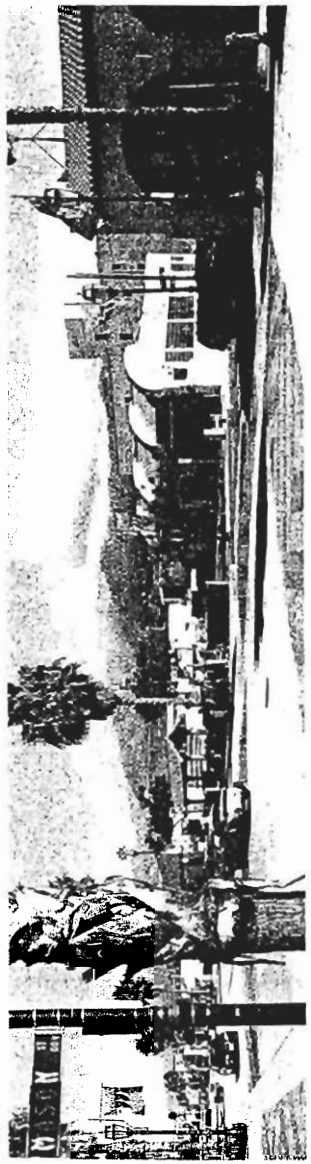
B-5 dealing with tidal waves, the new Corps of Engineers plan for altering Mission Creek, and the loss of low cost housing, which the Coastal Commission is also concerned about. All need to be addressed in the revised EIR.

As you know, the League of Women Voters has been deeply concerned about the way this project has been processed. We were concerned enough to file a lawsuit over it in the Superior Court; the first time this League has ever done so.

B-6 Today we are also recommending that the City reestablish an environmental review body to offer staff advice and support in handling projects like this from the application on, so that serious problems in environmental review will not occur again.



Draft Environmental Impact Report Entrada de Santa Barbara Headley & Associates	**Figure 1:** The current view from the southwest corner of the Mason Street-State Street intersection showing an unimpaired view of Cathedral and La Cumbre Peaks and several miles of the Santa Ynez Mountains. Note that Dviews of the mountains over one-story buildings are readily available.	2001



Draft Environmental Impact Report Entrada de Santa Barbara Headley & Associates	**Figure 2:** The current view from VP8, DEIR Figure 4-15, reportedly from the southwest corner of the Mason Street-State Street intersection showing a largely impaired view of the mountains, particularly Cathedral and La Cumbre Peaks.	2001

League of Women Voters of Santa Barbara, Inc., March 15, 2001

B-1. Please see responses to your specific concerns below.

B-2. The selection of the 19 different viewpoints used to illustrate potential project impacts on scenic public views is discussed in section 4.4.1., Photographic Simulations and View Angle Analysis. The viewpoints were selected to be representative of a reasonable range of visual conditions in the vicinity of the project. They were not selected to only illustrate the potential view blockage, but instead provide a continuum of the visual experience a person might have when traveling along Cabrillo Boulevard and the Waterfront, and along lower State Street. Additional viewpoints (e.g. at Mission Creek) were added in response to NOP comments. The analysis also provides a methodical description of the criteria and basis for conclusions about impact significance levels. The commentor's opinion in disagreement with the analytic conclusions will be forwarded for City decisionmaker consideration.

B-3. The analysis provided of impacts on public scenic views is qualitative, rather than quantitative. The EIR has explained significance criteria to evaluate the potential for a substantial change to the existing setting. The analysis also provides a methodical description of the criteria and basis for conclusions about impact significance levels. The commentor's opinion in disagreement with the analytic conclusions will be forwarded for City decisionmaker consideration. Numerous public comments have expressed the opinion that the proposed project would have a less than significant impact on public scenic views, as well as those comments reflecting your opinion.

B-4. Differing opinions of experts need only be noted in an EIR. Per the State CEQA Guidelines Section 15151, "Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts." The Final EIR includes the letter of Mr. Headley and responds to his opinions (see response to comment letter G). No significantly adverse impacts on public views were identified in this EIR. Therefore, no analysis of project alternatives is required to minimize impacts on public scenic views. Regardless of the EIR impact conclusions, City decisionmakers may determine that additional project modifications are needed to find the proposal consistent with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and the City's Local Coastal Program policies. Please see the Executive Summary, Areas of Known Controversy and Issues to be Resolved.

B-5. The Santa Barbara Superior Court has determined that the previously prepared Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project except for potential impacts on public scenic views. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada

Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

Responses to issues that are not subject to further CEQA analysis are provided below. CEQA requires additional environmental review (section 15162) only when new information is identified that would result in a previously undisclosed significant impact, or identification of a significant impact that was not previously identified as significant.

Tsunami Planning Issue

The commentor alleges that new information of substantial importance, which was not known at the time the Second Revision to the Initial Study was approved, regarding tsunamis and their potential to result in significant impacts must be analyzed in the EIR.

The Second Revision to the Initial Study (Pages 19 and 20) analyzed the potential for the Entrada project to result in or expose people to tsunamis and determined that no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project. The Entrada project is located at approximately 10 feet MSL and according to the City's Master Environmental Assessment maps is within the tsunami run-up area. Because the City requires buildings to be constructed to the Uniform Building Code (to withstand 100 year events) and because adequate evacuation plans are in place for the Waterfront area, no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project.

Since the preparation of the Second Revision to the Initial Study and adoption of the Entrada project's Mitigated Negative Declaration (August 1999), new information regarding tsunamis has been published. The California Office of Emergency Services has prepared tsunami inundation maps which estimate the run-up from a worst-case tsunami (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously). The California OES recognizes that its tsunami maps are not particularly useful for land planning, since the assumptions used to prepare the OES map (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously) exceed the design criteria for all development except nuclear facilities. The California OES has also produced the Local Planning Guidance on Tsunami Response (no date). The purpose of this document is to, "...assist local governments in the initial development of a tsunami response plans and the procedures necessary to deal with a tsunami's impact on their communities."

Neither the OES tsunami inundation maps nor the document Local Planning Guidance on Tsunami Response have identified new information of substantial importance that will result in new significant environmental effects which were not discussed in the Second Revision to the Initial Study.

In addition, the report Seismic Sea Wave (Tsunami) Potential, dated March 28, 2001 prepared by Michael Hoover, Consulting Geologist-Hydrologist (see Appendix G), evaluated the effects of a locally generated tsunami resulting from a maximum earthquake. Such an earthquake (Magnitude 7.4) could cause a wave height of 9 to 12 feet and result in the Entrada project, causing minor flooding. If such an earthquake occurred at high tide (likely recurrence frequency of 600 years) it could result in the Entrada project experiencing significant flooding. The structures would not be destroyed, however, and because they are proposed to be built of steel, could be used as evacuation facilities.

The Seismic Sea Wave (Tsunami) Potential also evaluated evacuation of the Waterfront relative to tsunamis. Distant source tsunamis result in relatively small (1 to 5.5 feet) waves in Santa Barbara, and lengthy warning times (usually hours) providing ample evacuation time. An earthquake locally of sufficient magnitude to generate a significant tsunami would likely also cause collateral damage to roads, liquefaction, slope failures, bridge failures, and scattering of building debris on roadways such that evacuation from the Waterfront via automobile would be impossible. Evacuation from the Waterfront area would be via foot to higher ground (e.g., to the top of the Santa Barbara City College stadium). No change in evacuation conditions would result from reducing the number of vehicle traffic lanes on State Street. Due to the low probability of tsunami occurrences and limited scope of the project, no significant impact would result from exposure of persons to tsunami risk.

Mission Creek

The commentor asserts that there is new information of substantial importance, which was not known at the time the Second Revision to the Initial Study was approved, regarding the proposed Lower Mission Creek Flood Control Project and its potential, together with the Entrada project, to result in significant impacts on the Mission Creek environment, thereby impacting the water environment, riparian habitat and sensitive species within the creek.

The Second Revision to the Initial Study (Pages 21 and 44) indicated that the proposed project will not have a significant impact on the natural communities or wetland habitats within Mission Creek, nor will changes to the drainage flow of Mission Creek occur as a result of the proposed project.

At the time the Second Revision to the Initial Study was prepared and approved (August 1999), the preferred plan for the proposed Lower Mission Creek Flood Control Project was not known. However, in anticipation of changes to the Mission Creek stream channel, in conjunction with the proposed Lower Mission Creek Flood Control Project, the Entrada de Santa Barbara Conditions of Approval contained in City Council Resolution No. 99-098 contain Condition G.13 which states:

G. Prior to issuance of demolition, grading or building permit for the proposed project:

13. The applicant shall review construction requirements with the Public Works Department to ensure that the development on Site A is consistent with approved plans for the improvement of Mission Creek at the time of project construction on Site A to the extent feasible. The Owner shall make all feasible changes to the plans as reasonably required by the Public Works Department. Costs for plan revisions shall be borne by the applicant.

In September 2000, the US Army Corps of Engineers released the Feasibility Report, together proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project. The recommended plan according to the Feasibility Report is Alternative 12. Appendix H shows Area A in this alternative as previously approved with the existing alignment and the proposed Alternative 12 alignment of Lower Mission Creek superimposed. As indicated on this Mission Creek Alignment alternative, if the Alternative 12 alignment of Lower Mission Creek is ultimately approved the proposed buildings on Area A (as previously approved) would be at the top-of-bank of Lower Mission Creek. However, as also indicated on this plan, Alternative 12 includes the demolition of buildings adjacent to the portion of the building on Area A closest to Mission Creek. In addition, a habitat restoration area is proposed between the west elevation of the building on Area A and the proposed top-of-bank of the Lower Mission Creek. According to the proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project, these components of Alternative 12 were found to offset any impact resulting from the building on Area A encroaching within the required 25 foot setback from the top-of-bank of Lower Mission Creek.

The Lower Mission Creek Flood Control Project has yet to be considered for approval, its final design has not been determined and remains unknown at this time. In addition, the staff recommendation for consideration of the Entrada project on its land use and design merits would include a condition similar to City Council Resolution No. 99-098, Condition G.13 described above.

Therefore, while the Lower Mission Creek Flood Control Project proposed alignment has been further refined since preparation of the Second Revision to the Initial Study, this additional information will not result in new or substantially more severe significant environmental effects which were not discussed in the Second Revision to the Initial Study.

Loss of Low-Cost Housing/Loss of Lower-Cost Visitor Serving Over-Night Accommodations

Relative to the loss of lower-cost visitor serving over-night accommodations, this is not an issue that is required to be assessed under CEQA nor is it required to be assessed pursuant to the City's Environmental Guidelines for the Implementation of CEQA or the City's Master Environmental Assessment.

However, during the review of the Entrada project on its merits, the Entrada project will be reviewed for consistency with the Local Coastal Plan policies which relate to lower-cost visitor serving accommodations. The California Coastal Commission has indicated that for the Entrada project to be consistent with the City's Local Coastal Plan, the conditions of project approval should include a condition requiring compensation for the loss of lower-cost visitor serving accommodations that the California Hotel once provided.

B-6. The comment does not address the adequacy of the EIR. Comments regarding the City environmental review process will be forwarded to the decisionmakers for their consideration. It is noted that City planning staff and City attorney staff involved in applying CEQA provisions are fully qualified and experienced in these matters, as are City decisionmaker bodies.

This page intentionally left blank.

916 Anacapa Street • Santa Barbara, California 93101 • (805) 966-3979 • Fax (805) 966-3970

CITIZENS PLANNING ASSOCIATION OF SANTA BARBARA COUNTY, INC.

March 15, 2001

Planning Commission
City of Santa Barbara

RE: Hearing on DEIR for Entrada de Santa Barbara and Lower State Street Improvements

Dear Planning Commissioners:

C-1 In good faith and in order to be helpful and facilitate the process, CPA prepared a four page document for the July EIR Scoping Hearing, listing items that we believed were necessary for consideration in an EIR. It is quite clear that the City did not respond to the requests of the public. Almost all of what we requested was totally ignored and of the many items we requested about all we have received is a listing of the visual protection policies and ordinances and some pictures and simulations. One positive note is that pictures speak louder than words and this is a good thing since some of the simulations do show significant impacts, for example View 6, but the text associated with View 6 and 6a is totally incredulous.

C-2 Citizens Planning Association fully expected that since the Court ordered an EIR to be prepared that the City would see to it that the decision-makers and the public would receive a document prepared by neutral experts that would contain a complete and comprehensive analysis of visual resources, the impacts of the proposed project, mitigation measures and alternatives. We could not have been more mistaken. What we have received is a faulty document that is riddled with inadequate analysis, illogical conclusions and transparent rationalizations. Our attorney and view expert have addressed some of the many problems that this document has at this hearing and we well be submitting additional comments in writing.

C-3 At the scoping hearing the public requested that a number of items of new information be included in the EIR. Included in these requests were those for information relative to traffic generation and circulation in the area. The following information provided in a report by the firm of Urban Crossroads constitutes new substantial evidence of significant traffic impacts.

We have retained the firm of Urban Crossroads to do a comparison of the trip generation of the existing uses and that of the proposed project in order to show how much new traffic the proposed project would produce. This comparison shows that the proposed project will increase trip generation by 2,020 additional trips per day; this is an increase of 80%.

Urban Crossroads did a traffic evaluation of the Entrada traffic study prepared by KAKU Associates and other related traffic issues in the adjacent area. Urban Crossroads reviewed the existing on-site developments and the square footage of each. This analysis represents the existing baseline for measuring impacts under CEQA. (Please note that the uses identified in the Urban Crossroads traffic study are different than those identified by the KAKU study, because Urban Crossroads used existing uses rather than permitted uses.)

Using ITE trip generation rates these existing on-site uses generate 2,591 trips per day. The Urban Crossroads study showed that the proposed project will generate 4,611 trips per day. What this shows us is that the Entrada project is anticipated to generate approximately 2,020 additional trips per day, with 188 additional trips occurring during the AM peak hour and 126 additional trips occurring during the PM peak hour.

C-3 The ramifications of this study would include an increase in the amount of future traffic to the study area intersections. Based on the trip distribution patterns present in the Urban Crossroads traffic study, the project would add a minimum of approximately 16 PM trips to the intersection of Garden Street and 101 NB Ramp. Based on City of Santa Barbara threshold criteria of adding more than 5 peak hour trips to an intersection that exceeds a 0.77 volume to capacity level, this would constitute a significant impact.

Urban Crossroads areas of expertise include transportation planning, modeling, database development, GIS, traffic engineering, acoustical studies, parking studies and traffic impact studies and in addition to their report we are submitting information as to qualifications and background of John Kain, AICP, Principal and Scott Sato, P.E., Senior Engineer.

Sincerely,

Catherine McCammon

Catherine McCammon, President, Citizens Planning Association

41 Corporate Park
Suite 300
Irvine, CA 92606
p: 949.660.1994
f: 949.660.1911

TRANSPORTATION PLANNING
TRAVEL DEMAND MODELING
DATA BASED DEVELOPMENT
GIS
TRAFFIC ENGINEERING
ACOUSTICAL STUDIES
PARKING STUDIES
TRAFFIC IMPACT STUDIES

John Kain
Carlette Mann
Chris Bell
Bill Lawson
Scott Gott

March 12, 2001

Ms. Tanya Gulesserian
Staff Attorney
ENVIRONMENTAL DEFENSE CENTER
906 Garden Street
Santa Barbara, CA 93101

Subject: La Entrada de Santa Barbara Traffic Evaluation

Dear Ms. Gulesserian

The firm of Urban Crossroads, Inc. is pleased to submit the following traffic evaluation of the Entrada De Santa Barbara traffic study prepared by Kaku Associates (August 1998) and other related traffic issues in the adjacent area. It is our understanding that the project consists of a mixture of resort hotel and retail developments adjacent to the intersection of State Street and Mason Street in the City of Santa Barbara. Specifically, this letter report addresses the following issues:

- Future project traffic generation beyond existing conditions
- Impacts of narrowing State Street to two lanes between the project frontage and the railroad tracts and turn restrictions
- Traffic signal warrants/intersection levels of service at the intersection of State Street/Mason Street

Future Trip Generation

The traffic study prepared by Kaku Associates assumed a comparison of the existing on-site uses versus the proposed development. The analysis concluded that the proposed development would generate fewer trips than the existing uses. It should be noted that the traffic study included an assumed reduction of trips (between 35-40%) to account for walk-in, transit trips, and internal use. Urban Crossroads, Inc. staff has reviewed the existing on-site developments and has identified the current square footage for each use. The existing uses identified in the traffic study are different than those identified by Urban Crossroads, Inc. staff. Table 1 summarizes the land use quantities for the existing site and the proposed development by its location.

The trip generation rates used to determine the approximate number of trips are presented in Table 2. These trip rates were based on the Institute of Transportation Engineers, Trip Generation Manual (6th Edition) and the San Diego Traffic Generators (December 1998). The resulting trip generation estimates for the land use quantities indicated in Table 1 are presented on Tables 3 and 4 for the existing and proposed developments, respectively. Table 5 presents a comparison between the existing and proposed project. As indicated in Table 5, the project is anticipated to generate approximately 2,020 additional trips per day with 188 additional trips occurring during the AM peak hour and 126 additional trips occurring during the PM peak hour. These estimates do not include a reduction in vehicle trips for either existing or proposed uses.

The ramifications of this finding would include an increase in the amount of future traffic to the study area intersections. Based on the trip distribution patterns presented in the KAKU traffic study, this would add a minimum of approximately 16 PM trips to the intersection of Garden Street and the SR-101 NB Ramp. Based on the City of Santa Barbara's impact criteria, this would constitute an impact due to adding more than 5 peak hour trips to an intersection that exceeds a 0.77 volume-to-capacity level.

Other Transportation-Related Issues

In addition to the issues discussed above, the following transportation related issues have been qualitatively reviewed by Urban Crossroads, Inc. staff:

- New Pedestrian Crossings
- Additional Parking across from the Site
- Traffic Signal at the intersection of State and Mason and the Possibility of New Stop Lights on Cabrillo Boulevard

New pedestrian crossings on Mason Street will provide pedestrians a designated mid-block crossing to access adjacent uses across Mason Street. Although crosswalks are provided at the intersections with State and Helena streets, a mid-block crossing may eliminate jay walking. Based on the site design, it appears that pedestrians would be required to use a circuitous route to access the crosswalks at the intersections.

The proposed parking areas across from the site will require pedestrians to cross both State and Mason Streets to access the proposed project. Although this could increase vehicular delays due to additional pedestrian activity, it is typical of this type of development in urban areas.

Ms. Tanya Gulesserian
ENVIRONMENTAL DEFENSE CENTER
March 12, 2001
Page 3

In general, traffic signals should be constructed if warrants are met. The Kaku Associates traffic study assumed that a traffic signal would be constructed at the intersection of State Street and Mason Street but did not include the signal warrant worksheets justifying this assumption. However, in the future, if minimum warrants are met at this intersection or other locations along Cabrillo Boulevard, traffic signals should be implemented.

Conclusions

In reviewing the existing and proposed uses, Urban Crossroads, Inc. has determined that the project will add trips to an intersection identified as exceeding the minimum volume-to-capacity threshold of 0.77 (Garden Street at SR-101 NB Ramp).

The roadway modifications to State Street are expected to cause traffic to be rerouted to adjacent parallel routes. These modifications include narrowing State Street to one through lane in each direction and prohibiting north/south left turns at the intersection of State Street and Mason Street.

If you have any questions please do not hesitate to call us at (949) 660-1994.

Sincerely,

URBAN CROSSROADS, INC.

John Kain, AICP
Principal

Scott Sato, P.E.
Senior Engineer

00059-0088-01
JK:SS:pr
Attachments

TABLE 1

COMPARISON OF PROPOSED PROJECT TO EXISTING CONDITIONS

AREA	EXISTING OCCUPIED LAND USE	PROPOSED LAND USE
A (Southwest Quadrant, State/Mason)	None (Hotel/Restaurant Bldg. Unoccupied and closed for Business)	52 rooms/vacation units 5,368 sq. ft. retail
B (Northeast Quadrant, State/Mason)	7,496 sq. ft. warehouse 2,400 sq. ft. bike rental 1,352 sq. ft. restaurant 1,352 sq. ft. retail	60 rooms/vacation units 4,588 sq. ft. retail
C (Southeast Quadrant, State/Mason)	8,555 sq. ft retail[1] 1,335 sq. ft. auto/boat repairs/services 1,000 sq. ft. auto sales/rental 780 sq. ft. warehouse	50 rooms/vacation units 7,576 sq. ft. retail 2,500 sq. ft. visitor info. Center

[1] "5 for 10 T-Shirts" at 6,135 square feet, Paddle Sports at 2,160 square are feet, and wine tasting at 260 square feet.

H:\UcJobs\00059\excel\[00059-0088-02.xls]T 1

TABLE 2

TRIP GENERATION RATES[1]

LAND USE	ITE CODE	QUANTITY	UNITS[4]	PEAK HOUR TRIP RATES AM IN	AM OUT	PM IN	PM OUT	DAILY RATE
Auto Related Sales/Service	843		TSF	1.75	0.75	2.93	3.05	61.91
Resort Hotel	330		RM	0.22	0.9	0.18	0.24	8.23
Restaurant	832		TSF	4.72	4.45	6.52	4.34	130.34
Retail	820	3.752	TSF	3.67	2.35	9.2	9.97	220.07
Retail	820	4.588	TSF	3.38	2.16	8.59	9.31	204.92
Retail	820	5.368	TSF	3.18	2.03	8.15	8.83	193.65
Retail	820	7.576	TSF	2.76	1.77	7.25	7.85	171.24
Retail	820	8.565	TSF	2.63	1.68	6.95	7.53	163.97
Warehouse	150		TSF	0.37	0.08	0.12	0.39	4.96

Source: ITE (Institute of Transportation Engineers) Trip Generation Manual, 6th Edition, 1997

[2] TSF = Thousand Square Feet
RM = Rooms

H:\UcJobs\00059\excel\[00059-0088-02.xls]T 2

TABLE 3

EXISTING LA ENTRADA TRIP GENERATION SUMMARY

LAND USE	QUANTITY	UNITS1	PEAK HOUR AM IN	AM OUT	PM IN	PM OUT	DAILY
Area A							
Existing Land Use Closed			0	0	0	0	0
Area B							
Retail	3.752	TSF	14	9	35	37	826
Warehouse	7.496	TSF	3	1	1	3	37
Restaurant	1.352	TSF	6	6	9	6	176
Subtotal			23	16	45	46	1,039
Area C							
Retail	8.565	TSF	22	14	59	84	1,400
Warehouse	0.780	TSF	0	0	0	0	4
Auto Related Sales/Service	2.335	TSF	4	2	7	7	145
Subtotal			26	16	66	71	1,552
TOTAL			49	32	111	117	2,591

[1] TSF = Thousand Square Feet
DU = Dwelling Units
STU = Students

[2] Nom = Nominal

H:\UcJobs\00059\excel\[00059-0088-02.xls]T 3

TABLE 4

PROPOSED LA ENTRADA TRIP GENERATION SUMMARY

LAND USE	QUANTITY	UNITS[1]	PEAK HOUR AM IN	PEAK HOUR AM OUT	PEAK HOUR PM IN	PEAK HOUR PM OUT	DAILY
Area A							
Resort Hotel	52	RM	11	47	9	12	428
Retail	5.368	TSF	17	11	44	47	1,040
Subtotal			28	58	53	59	1,468
Area B							
Resort Hotel	60	RM	13	54	11	14	494
Retail	4.588	TSF	16	10	39	43	940
Subtotal			29	64	50	57	1,434
Area C							
Resort Hotel	50	RM	11	45	9	12	412
Retail	7.576	TSF	21	13	55	59	1,297
Subtotal			32	58	64	71	1,709
TOTAL			89	180	167	187	4,611

[1] TSF = Thousand Square Feet
RM = Rooms

H:\UcJobs\00059\excel\[00059-0088-02.xls]T 4

TABLE 5

TRIP GENERATION DIFFERENCE BETWEEN THE PROPOSED PROJECT AND THE EXISTING USES

LAND USE	PEAK HOUR AM IN	PEAK HOUR AM OUT	PEAK HOUR PM IN	PEAK HOUR PM OUT	DAILY
Area A					
Proposed Uses	28	58	53	59	1,468
Existing Uses	0	0	0	0	0
Subtotal	28	58	53	59	1,468
Area B					
Proposed Uses	29	64	50	57	1,434
Existing Uses	23	16	45	46	1,039
Subtotal	6	48	5	11	395
Area C					
Proposed Uses	32	58	64	71	1,709
Existing Uses	26	16	66	71	1,552
Subtotal	6	42	-2	0	157
TOTAL	40	148	56	70	2,020

[1] TSF = Thousand Square Feet
RM = Rooms

H:\UcJobs\00059\excel\[00059-0088-02.xls]T 5

John Kain, AICP
Principal

AREAS OF EXPERTISE

- Transportation Planning and Problem Solving
- Cooperative Study Management
- Traffic Impact Analyses
- Circulation Systems for Planned Communities
- Travel Demand Modeling
- General Plan Circulation Elements
- Neighborhood Traffic Control
- Parking Studies
- Public Outreach

EDUCATION

University of California, Irvine: M.S., Transportation Systems Management, 1977

University of California, Irvine: B.A., Social Ecology, 1975

University of California, Irvine: Certificate in Management of Transportation Programs, 1981

California Community Colleges, Instructor Credential, Public Services/Admin. 1981

REPRESENTATIVE EXPERIENCE

John Kain, AICP has worked professionally in transportation planning and traffic engineering since 1975. He received the master of science degree in administration from the University of California, Irvine, where he specialized in transportation systems evaluation. Mr. Kain has served on the Institute of Transportation Engineers technical committees for Traffic Forecasting and Highway Access Control.

His work on circulation plans and transportation studies for planned communities has included Mission Viejo, Aliso Viejo, Foothill Ranch, Bolsa Chica, and the Irvine Village of Westpark in Orange County; Sun City Palm Desert, Victoria Grove, Winchester Hills, and the Vineyard in Riverside County; South Poway and EastLake in San Diego County; Westgate and East Highlands Ranch in San Bernardino County; Rosedale Ranch and Pacificana in Kern County; Oxnard Town Center and Ormond Beach in Ventura County; Highlands Ranch and Edgemont Ranch in Colorado.

He also prepared the general plan circulation elements for fourteen cities in California, including Beaumont, Hesperia, Indian Wells, Indio, Montclair, Murrieta, Norwalk, Rancho Mirage, San Jacinto, and Solana Beach.

Mr. Kain has managed the development and application of traffic models and Geographic Information Systems (GIS) databases for over twenty areas in California, including Irvine, Huntington Beach, Southeast Orange County, Chino, San Bernardino County RSA 33, Menifee, Moreno Valley, Southwest Riverside County, Palm Desert, Ojai, Mammoth, and Imperial County.

Mr. Kain's experience with transportation studies for unique land uses includes the Long Point resort in Rancho Palos Verdes, Aliso/Wood Canyons Regional Park, MWD Eastside Reservoir Recreation Areas, Sharp Murrieta Healthcare Center, McDonnell Douglas Long Beach Facilities Expansion, the Kern County Foreign Trade Zone, and Saddleback Community Church.

Examples of his work on transit oriented community designs include the Millennium Plan (El Toro Base Reuse) and San Juan Capistrano Metrolink Station Area.

John Kain, AICP
Principal

PROFESSIONAL HISTORY

RKJK & Associates, Inc., Principal, 1990-2000

Kunzman Associates, Principal, 1983-1990

Jack G. Raub Company, Manager of Transportation and Traffic Engineering, 1980-1983

Jack G. Raub Company, Transportation Planner, 1978-1980

Institute of Transportation Studies, Research Associate, 1976 & 1977

AFFILIATIONS

American Planning Association (APA)

Institute of Transportation Engineers (ITE)

Transportation Research Board (TRB)

American Society of Civil Engineers (ASCE)

Urban Land Institute (ULI)

AWARDS

Orange County APA, Comprehensive Planning Award – Millennium Plan (1999)

CCAPA Merit Award, Large Jurisdiction Plan (1999)

Mr. Kain has managed the preparation of parking studies for the Temecula Old Town, Bakersfield Convention Center, Perris Downtown, and UCI Bren Center.

His work on commercial areas has included the Foothill Ranch Towne Centre, Murrieta Springs Mall (RogersDale), Carlsbad Albertsons Center, Rancho Mirage SR-111 Corridor, and the Desert Cities Auto Mall. His experience with office and industrial areas includes the Irvine Business Complex (IBC), Rialto Airport Specific Plan, Victorville Southdown Industrial Park, Borel Airpark Center, and Cheyenne Airpark (Nevada).

Mr. Kain's involvement with neighborhood traffic control includes the Bolsa Chica roundabout design, Mesa West Neighborhood Traffic Management Plan, and numerous residential street impact assessments.

Mr. Kain's experience with educational facilities includes the UCI Long Range Development Plan, CSUSB Palm Desert campus, and California Baptist College.

His work on freeway interchange ramp configurations and concept plans includes Washington Street at the I-10 Freeway, Jefferson Avenue at the I-10 Freeway, Trabuco Road at the SR-133 Tollway and Portrero Boulevard at the SR-60 Freeway.

Cooperative transportation studies managed by Mr. Kain have included the Ramona Expressway, State Route 79, and Van Buren corridors in Riverside County, the Imperial Highway corridor in Yorba Linda, planned Orange County Santa Ana River Crossings between I-405 and Pacific Coast Highway in Orange County, and assessments of the Aliso Creek Road and Ridge Route Drive extensions in Orange County.

Mr. Kain co-founded the firm of Transware Systems in 1982 to provide transportation planning software for microcomputer applications. His professional activities have included presentations for ITE meetings, model user group workshops, UCI courses, APA programs, and APA newsletter articles. He is an effective communicator and pubic speaker, and has coordinated many public outreach efforts related to transportation issues.

Scott Sato
Transportation Engineer

AREAS OF EXPERTISE

- Transportation Planning and Engineering
- Traffic Impact Analysis
- Travel Demand Modeling
- Traffic Signal Design
- Signal Timing & Progression Analysis
- Parking Studies
- On-Call Consulting Services for Public Agencies

EDUCATION

University of California, Irvine: B.S., Civil Engineering, 1990

PROFESSIONAL HISTORY

RKJK & Associates, Inc., Transportation Engineer, (1994 – 2000)

DKS Associates, Transportation Engineer, (1990 – 1994)

Linscott, Law, and Greenspan, Engineering Intern, (1989 – 1990)

AFFILIATIONS

Institute of Transportation Engineers (ITE)

Southwestern Region TRANPLAN Model Users' Group

REPRESENTATIVE EXPERIENCE

Scott Sato has been working in the field of transportation planning and engineering since 1989. He received his Bachelor of Science degree (Engineering) from the University of California, Irvine in 1990, specializing in transportation studies.

Mr. Sato has worked throughout northern and southern California and Nevada on General and Specific Plan updates, transit modeling, traffic forecasting and circulation plans. His work has included the Douglas County and Sacramento County, and the City of Davis Model Updates. Mr. Sato has also developed travel demand models in southern California for the community of Aliso Viejo, Eastvale, and the City of Palm Desert.

Mr. Sato has assisted the Los Angeles Metropolitan Transportation Agency (MTA) in preparing transit network alternatives with rail, bus, and HOV components.

Mr. Sato has been active in preparing and updating the traffic impact fee systems for the Cities of Seal Beach and Roseville.

Mr. Sato has designed traffic signals in the Cities of Mission Viejo, Aliso Viejo, and Hawaiian Gardens. Along with his experience in signal design, he has also prepared traffic signal timing and progression studies in the Cities of Santa Ana and Mission Viejo.

Currently, Mr. Sato is active in reviewing development applications at the City of Irvine as an on-call consultant. His duties include reviewing all traffic and access studies, discretionary cases, and code compliance applications. He is also responsible for attending commission meetings on behalf of city staff.

Citizens Planning Association, Catherine McGammon, March 15, 2001

C-1. The City did consider CPA's comments on the project EIR NOP. State CEQA Guidelines Section 15083 does not require that NOP comments from the public be addressed in the DEIR unless they are determined to be required analysis under CEQA. Please see responses to your specific concerns below. Your comments and opinion disagreeing with the analysis for view 6 will be forwarded for decisionmaker consideration.

C-2. The comment does not provide specific detail regarding the perceived inadequacies of the environmental impact analysis. The EIR presents an objective analysis prepared by neutral experts. The SAIC, Videoscapes, and City staff are all qualified personnel and none has any personal stake in the outcome of the project. It is noted that per State CEQA Guidelines Section 15084, the City as lead agency cannot delegate responsibility for the EIR analysis and conclusions to another party: "Before using a draft prepared by another person, the lead agency shall subject the draft to the agency's own review and analysis. The draft EIR which is sent out for public review must reflect the independent judgment of the lead agency. The lead agency is responsible for the adequacy and objectivity of the draft EIR." CEQA and the CEQA Guidelines are clear that a "lead agency" (in this case, the City) may not defer environmental analysis and policy decisions to another party.

C-3. The Santa Barbara Superior Court has determined that the previously prepared Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project except for potential impacts on public scenic views. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

However, while not subject to further environmental review, the following information regarding the Urban Crossroads traffic and circulation assessment was provided by Kaku Associates and reviewed by City Transportation Division staff.

Project Trip Generation

The traffic report prepared by Kaku Associates in 1998 used the City of Santa Barbara's approved methodology for investigating the impacts of a new project when that new project would replace existing buildings/land uses on the site. That methodology is as follows:

a. The size and zoning of the existing on-site land uses are summarized. If the on-site buildings are vacant, but could be occupied again without any new discretionary approval from the City, then the building size and land use are added to the on-site total for existing conditions.

b. The trip generation for the existing on-site buildings/land uses is calculated using a reference source approved by the City. In most cases, the Institute of Transportation Engineers *Trip Generation Manual, Sixth Edition* will be used as the City's reference of choice.

c. The same trip generation reference will be used to calculate the trip generation of the proposed land uses on site.

d. In some cases, the trip generation rates found in the *Trip Generation Manual* will be adjusted to reflect conditions at the site. Any adjustments to the standard trip generation rates must be approved by the City.

e. The two trip generation studies described above are compared and the difference in trips is considered to be the net trip generation effect of the proposed project. The traffic impacts of the proposed project are identified based on this net trip generation.

The trip generation comparison included in the Urban Crossroads letter ignores two factors in the above methodology – the definition of on-site land uses and trip reductions.

On-Site Land Uses

The City assumes that if a building can be re-occupied without any additional discretionary approval from the City, it should be counted as "existing square footage," even if it happens to be temporarily vacant at the time of the study. CEQA case law was presented during the Planning Commission and City Council deliberations on this project that supported the City's interpretation of the definition of "existing on-site land use."

Thus the Urban Crossroads study is incorrect in its definition of the amount of land use on site today. Therefore, the Urban Crossroads study underestimates the trip generation of the existing on-site land uses.

Trip Reductions

The trip generation rates used in the Urban Crossroads traffic study were based on the data found in the *Trip Generation Manual* as required by the City. The *Trip Generation Manual* represents a collection of trip rates from across the United States – most of which reflect suburban, single-use projects that experience little transit or walk-in patronage. Indeed, the data collected for the *Trip Generation Manual* is intended to document the peak automobile generation of each individual land use and, typically, the suburban projects do just that.

However, many projects in Santa Barbara do not behave as single-use suburban developments, and therefore it is appropriate and more accurate to adjust the trip generation rates accordingly. For example, commercial projects along the oceanfront have traditionally received a 25 percent reduction from suburban rates to reflect the pedestrian nature of the State Street/Cabrillo Boulevard corridors.

Visitor-serving projects along State Street and Cabrillo Boulevard corridors are well served by transit and shuttle service, and it is appropriate to assume that the well-utilized shuttle system would serve hotel and retail land uses along these corridors. Again, the suburban trip generation rates found in the *Trip Generation Manual* would not reflect the service offered by the State Street shuttle.

Finally, the Urban Land Institute in its publication *Shared Parking* documented that visitors to a mixed-use project tend to visit more than one land use in the project during a single visit. This capture of multiple trips tends to reduce both the number of trips and the parking requirements of mixed-use projects. Multiple visits in the range of 20-70 percent were found in the ULI study.

The first two trip reduction factors above (walk-in and shuttle) would apply to both the existing and proposed land uses while the third (mixed-use project) would only apply to the proposed project.

The trip reductions applied by Kaku Associates were approved by the City Transportation Division staff prior to their use in the study. They are reasonable and conservative. No additional trip reduction was taken for the mixed-use aspect of the project, and the walk-in and transit reductions are consistent with reductions approved by the City for other projects in the area.

The Urban Crossroads analysis used the incorrect definition of existing on-site land uses and it failed to take into account legitimate and well-documented trip reductions. Therefore, the Urban Crossroads analysis incorrectly underestimates the number of existing trips and overestimates the number of trips from the new project. The City believes that the trip generation estimate in the Kaku Associates report reflects a more accurate estimate of the net trip generation of the proposed project. Given this, we do not agree with the Urban Crossroads conclusion that the project would impact the intersection of Garden Street/US 101 northbound ramp.

Traffic Signals Warrants

We agree with the statements in the Urban Crossroads letter regarding traffic signal warrants. The City believes that the traffic and pedestrian activity generated by the new project would warrant a new traffic signal at Mason Street/State Street, and therefore a warrant analysis was not required.

When the warrant is met, the signal (and any other warranted signal on Cabrillo Boulevard) would be installed consistent with the City's ability to fund the installation. In the case of the proposed project, the Mason Street/State Street signalization would be a recommended condition of the project and therefore would be installed consistent with warrants.

Pedestrian Crossings of State and Mason Streets

We concur with the comments of Urban Crossroads. Additional pedestrian crossings of both State Street and Mason Street would be generated by the project and the intersection and mid-block crosswalks proposed by the project are intended to accommodate the increased activity. As pointed out by Urban Crossroads, the crosswalks are typical treatments in urban areas.

This page intentionally left blank.

✓ Given 3 min. to L. Headley

Santa Barbara Streets R Us Committee
135 Chapala Street
Santa Barbara, CA 93101
www.StreetsRUs.org
info@streetsrus.org
805-957-1024

PRESS RELEASE — March 15, 2001

Members of the Planning Commission

D-1 My name is Elisabeth Donati and I am the Chairperson for Streets R Us. We have been told by the city, and it is our understanding, that the sole purpose of this meeting is to solicit initial public comments on, and to review, the draft environmental impact report prepared to address deficiencies in the previous negative declaration. This "focused" E.I.R. is the developers attempt to adequately assess those deficiencies pursuant to C.E.Q.A.

This project, or at the least a substantial part of it, lies within the coastal zone and designated HRC-II.

Accordingly there are a number of issues involving all aspects of this project and whether or not it complies with requirements of the California Coastal Act, the Local Coastal Plan and the City's Zoning Overlay Ordinance.

D-2 We understand that all of these matters will be taken up at a future hearing when this commission is required to conduct its review of these coastal zone mandates before considering the issuance of a coastal development permit.

For these reasons, Streets "R" Us is reserving its comments on the many coastal zone deficiencies and will address critical aspects of our current initiative drive concerning waterfront access streets at the appropriate planning commission meeting in the future.

Elisabeth Donati
Chairperson

Streets R Us, Elizabeth Donati, March 15, 2001

D-1. The focused EIR has been prepared by the City of Santa Barbara. The applicant has not been responsible for any analysis of proposed project impacts on public scenic views.

D-2. Your comment is noted. A preliminary analysis of the project's consistency with applicable goals and policies related to public scenic views is presented in Chapter 3.0, Land Use and Policy Considerations.

LEAGUE OF WOMEN VOTERS OF SANTA BARBARA, INC.

1217-A De La Vina Street
Santa Barbara, California 93101
TEL/FAX (805) 965 2422
e-mail: lwvsb@silcom.com
www.lwvsantabarbara.org

March 20, 2001

RECEIVED
MAR 21 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Grant House, Chair
City Planning Commission
City of Santa Barbara Planning Division
630 Garden Street
Santa Barbara, CA 93101

Subject: Entrada Project Draft EIR

Dear Commissioners,

E-1 The League of Women Voters is submitting our comments on the Draft EIR in this letter. In addition to the comments we want to voice our concern about the several disputes surrounding the Entrada project. Such contention is not good for the image or confidence of the City, which has long enjoyed a good reputation for our planning process. To avoid repetitions, we would like to recommend that the City reestablish an environmental review committee with authority to review projects in the very early stages. It would be necessary to appoint committee members with a working knowledge of the California Environmental Quality Act (CEQA). In this City it should probably not be hard to find experts willing to work with staff and applicants. This would free the Planning Commission to work with land use issues that are more familiar to them.

E-2 The League is asking for some major revisions to this draft. The conclusions reached in the Draft EIR do not follow from the visual evidence. Views 5 through 10 clearly show great impacts on the views from State Street, which is a central viewing area. The News-Press reproductions let the average person see those impacts, and it seems strange to everyone that they were not found to be significant. It appears that the City developed the desired conclusion before the photo analysis was made. This then cannot be called an impartial analysis. The View expert that we hired to review the project agrees, and finds that there will be significant impacts. We ask that the City correct

E-3 their analysis to show that there are significant impacts on the views from State Street. (It has been suggested that the views might be "averaged out" in some way, but this would not be satisfactory at all, since the City had asked to have many views analyzed that had never been in question at all and would seriously distort the average.)

E-4 We ask the Planning Commission to help us obtain a revised EIR that correctly assesses view impacts. That will require the City to discuss alternatives, and will give staff a chance to outline what would make a better project: probably two stories, with wide setbacks from State Street to allow for wide sidewalks, and leaving the street at its present width. That could reduce the serious effect on views.

We also ask that the new information we asked for during the scoping hearing, and required by CEQA, be covered:

1. Mission Creek. The newly developed plans for widening and changing Mission Creek need to be evaluated with reference to the Entrada project.
2. Tsunami planning. The new information available about the likelihood of a Santa Barbara Channel earthquake creating tidal waves that would inundate the entire waterfront area has never been evaluated in connection with this project. We are not concerned about the buildings themselves; that is the owner's concern. We are concerned that every effort be made to leave all avenues of exit open and unimpeded for both

E-5 pedestrians and cars. Our planning should not only include tsunamis, but every fire, flood or civil disturbance that may require fast evacuation into, or out of, the waterfront.

New information has also been submitted on traffic problems that should be reviewed. Using the correct CEQA procedure, a current traffic count has been made in the State Street area, and an experienced traffic consultant has found that the Entrada project will generate over 2,000 new trips each day. This much traffic will produce new impacts at State and Cabrillo and at Garden Street and Highway 101. This new, corrected information must be included in the EIR as well, because it shows very serious impacts that were never considered before.

E-6 We regret that this has been such an arduous process for everyone. We hope that some changes at the beginning of project approvals may enable the City to enforce the mandates of the law and its own planning process without such delays and stress for the City, the applicant, and the public.

Beverly King
Beverly King
President

Connie Hannah
Connie Hannah
Sustainable Communities Director

League of Women Voters of Santa Barbara, Inc., March 20, 2001

E-1. The comment does not address the adequacy of the EIR. This comment pertains to re-establishing the City Environmental Review Committee. It is noted that both City staff and City Planning Commission are qualified and experienced in applying CEQA provisions. CEQA requires a Supplemental EIR be prepared (section 15162) only when new information is identified that would result in a previously undisclosed significant impact, or identification of a significant impact that was not previously identified as significant.

E-2. The comment does not provide a specific basis for the inadequacy of the environmental analysis in the EIR. The comment appears to presume that "any" impact is a significant adverse environmental impact. However, CEQA is clear that this is not the appropriate standard for determining a significant adverse environmental impact, particularly with respect to a project's potential effects on public views. The analysis of impacts on public views provided is qualitative, rather than quantitative. The EIR has explained significance criteria to evaluate the potential for a substantial change to the existing setting. The analysis also provides a methodical description of the criteria and basis for conclusions about impact significance levels. The commentor's opinion in disagreement with the analytic conclusions will be forwarded for City decisionmaker consideration. Numerous public comments have expressed the opinion that the proposed project would have a less than significant impact on public scenic views, as well as those comments reflecting your opinion. Differing opinions of experts need only be noted in an EIR. Per the State CEQA Guidelines Section 15151, "Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts." The Final EIR includes the letter of Mr. Headley and responds to his opinions (see response to comment letter G).

E-3. Please see section 4.3.2.1, Impact Significance Criteria. The potential project impacts on the public scenic views as experienced from the 19 viewpoints were not "averaged out." Although the impacts were presented both individually and collectively (please see Table ES-1, Summary of Impacts on Public Scenic Views that has been added to the Final EIR), the threshold of significance was applied to each view evaluated.

The selection of the 19 different viewpoint used to illustrate potential project impacts on scenic public views is discussed in section 4.4.1., Photographic Simulations and View Angle Analysis. The viewpoints were selected to be representative of a reasonable range of visual conditions in the vicinity of the project. They were not selected to only illustrate the potential view blockage, but instead provide a continuum of the visual experience a person might have when traveling along Cabrillo Boulevard and the Waterfront, and along lower State Street. Additional viewpoints (e.g., at Mission Creek) were added in response to NOP comments.

E-4. No significantly adverse impacts on public views were identified in this EIR. Therefore, no analysis of project alternatives is required to minimize impacts on public scenic views. Regardless of the EIR impact conclusions, City decisionmakers may determine that additional project modifications are needed to find the proposal consistent with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and the City's Local Coastal Program policies. Please see the Executive Summary, Areas of Known Controversy and Issues to be Resolved.

E-5. The Santa Barbara Superior Court has determined that the previously prepared Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project except for potential impacts on public scenic views. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

Responses to issues that are not subject to further CEQA analysis are provided below. CEQA requires additional environmental review (section 15162) only when new information is identified that would result in a previously undisclosed significant impact, or identification of a significant impact that was not previously identified as significant.

Tsunami Planning Issue

The commentor alleges that new information of substantial importance, which was not known at the time the Second Revision to the Initial Study was approved, regarding tsunamis and their potential to result in significant impacts must be analyzed in the EIR.

The Second Revision to the Initial Study (Pages 19 and 20) analyzed the potential for the Entrada project to result in or expose people to tsunamis and determined that no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project. The Entrada project is located at approximately 10 feet MSL and according to the City's Master Environmental Assessment maps is within the tsunami run-up area. Because the City requires buildings to be constructed to the Uniform Building Code (to withstand 100 year events) and because adequate evacuation plans are in place for the Waterfront area, no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project.

Since the preparation of the Second Revision to the Initial Study and adoption of the Entrada project's Mitigated Negative Declaration (August 1999), new information regarding tsunamis has been published. The California Office of Emergency Services has prepared tsunami inundation maps which estimate the run-up from a worst-case tsunami (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously). The California OES recognizes that its tsunami maps are not particularly useful for land planning, since the assumptions used to prepare the OES map (Magnitude 7.0

earthquake, 100-year flood, and high tide all occurring simultaneously) exceed the design criteria for all development except nuclear facilities. The California OES has also produced the Local Planning Guidance on Tsunami Response (no date). The purpose of this document is to, "...assist local governments in the initial development of a tsunami response plans and the procedures necessary to deal with a tsunami's impact on their communities."

Neither the OES tsunami inundation maps nor the document Local Planning Guidance on Tsunami Response have identified new information of substantial importance that will result in new significant environmental effects which were not discussed in the Second Revision to the Initial Study.

In addition, the report Seismic Sea Wave (Tsunami) Potential, dated March 28, 2001 prepared by Michael Hoover, Consulting Geologist-Hydrologist (see Appendix G), evaluated the effects of a locally generated tsunami resulting from a maximum earthquake. Such an earthquake (Magnitude 7.4) could cause a wave height of nine to twelve feet and result in the Entrada project experiencing minor flooding. If such an earthquake occurred at high tide (likely recurrence frequency of 600 years) it could result in the Entrada project experiencing significant flooding, but that the structures would not be destroyed and because they are proposed to be built of steel, could be used as evacuation facilities.

The Seismic Sea Wave (Tsunami) Potential also evaluated evacuation of the Waterfront relative to tsunamis. Distant source tsunamis result in relatively small (1 to 5.5 feet) waves in Santa Barbara, and lengthy warning times (usually hours) providing ample evacuation time. An earthquake locally of sufficient Magnitude to generate a significant tsunami would likely also cause collateral damage to roads, liquefaction, slope failures, bridge failures, and scattering of building debris on roadways such that evacuation from the Waterfront via automobile would be impossible. Evacuation from the Waterfront area would be via foot to higher ground (i.e. to the top of the Santa Barbara City College stadium). No change in evacuation conditions would result from reducing the number of vehicle traffic lanes on State Street. Due to the low probability of tsunami occurrences and limited scope of the project, no significant impact would result from exposure of persons to tsunami risk.

Mission Creek

The commentor asserts that there is new information of substantial importance that was not known at the time the Second Revision to the Initial Study was approved regarding the proposed Lower Mission Creek Flood Control Project and its potential, together with the Entrada project, to result in significant impacts on the Mission Creek environment, thereby impacting the water environment, riparian habitat and sensitive species within the creek.

The Second Revision to the Initial Study (Pages 21 and 44) indicated that the proposed project will not have a significant impact on the natural communities or wetland habitats within Mission Creek, nor will changes to the drainage flow of Mission Creek occur as a result of the proposed project.

At the time the Second Revision to the Initial Study was prepared and approved (August 1999), the preferred plan for the proposed Lower Mission Creek Flood Control Project was not known. However, in anticipation of changes to the Mission Creek stream channel, in conjunction with the proposed Lower Mission Creek Flood Control Project, the Entrada de Santa Barbara Conditions of Approval contained in City Council Resolution No. 99-098 contain Condition G.13 which states:

G. Prior to issuance of demolition, grading or building permit for the proposed project:

13. The applicant shall review construction requirements with the Public Works Department to ensure that the development on Site A is consistent with approved plans for the improvement of Mission Creek at the time of project construction on Site A to the extent feasible. The Owner shall make all feasible changes to the plans as reasonably required by the Public Works Department. Costs for plan revisions shall be borne by the applicant.

In September 2000, the US Army Corps of Engineers released the Feasibility Report, together proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project. The recommended plan according to the Feasibility Report is Alternative 12. Appendix H shows Area A in this alternative as previously approved with the existing alignment and the proposed Alternative 12 alignment of Lower Mission Creek superimposed. As indicated on this Mission Creek Alignment alternative, if the Alternative 12 alignment of Lower Mission Creek is ultimately approved the proposed buildings on Area A (as previously approved) would be at the top-of-bank of Lower Mission Creek. However, as also indicated on this plan, Alternative 12 includes the demolition of buildings adjacent to the portion of the building on Area A closest to Mission Creek. In addition, a habitat restoration area is proposed between the west elevation of the building on Area A and the proposed top-of-bank of the Lower Mission Creek. According to the proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project, these components of Alternative 12 were found to offset any impact resulting from the building on Area A encroaching within the required 25 foot setback from the top-of-bank of Lower Mission Creek.

The Lower Mission Creek Flood Control Project has yet to be considered for approval, its final design has not been determined and remains unknown at this time. In addition, the staff recommendation for consideration of the Entrada project on its land use and design merits would include a condition similar to City Council Resolution No. 99-098, Condition G.13 described above.

Therefore, while the Lower Mission Creek Flood Control Project proposed alignment has been further refined since preparation of the Second Revision to the Initial Study, this additional information will not result in new or substantially more severe significant environmental effects which were not discussed in the Second Revision to the Initial Study.

Project Trip Generation

The traffic report prepared by Kaku Associates in 1998 used the City of Santa Barbara's approved methodology for investigating the impacts of a new project when that new project would replace existing buildings/land uses on the site. That methodology is as follows:

a. The size and zoning of the existing on-site land uses are summarized. If the on-site buildings are vacant, but could be occupied again without any new discretionary approval from the City, then the building size and land use are added to the on-site total for existing conditions.

b. The trip generation for the existing on-site buildings/land uses is calculated using a reference source approved by the City. In most cases, the Institute of Transportation Engineers *Trip Generation Manual, Sixth Edition* will be used as the City's reference of choice.

c. The same trip generation reference will be used to calculate the trip generation of the proposed land uses on site.

d. In some cases, the trip generation rates found in the Trip Generation Manual will be adjusted to reflect conditions at the site. Any adjustments to the standard trip generation rates must be approved by the City.

e. The two trip generation studies described above are compared and the difference in trips is considered to be the net trip generation effect of the proposed project. The traffic impacts of the proposed project are identified based on this net trip generation.

The trip generation comparison included in the Urban Crossroads letter ignores two factors in the above methodology – the definition of on-site land uses and trip reductions.

On-Site Land Uses

The City assumes that if a building can be re-occupied without any additional discretionary approval from the City, it should be counted as "existing square footage," even if it happens to be temporarily vacant at the time of the study. CEQA case law was presented during the Planning Commission and City Council deliberations on this project that supported the City's interpretation of the definition of "existing on-site land use."

Thus the Urban Crossroads study is incorrect in its definition of the amount of land use on site today. Therefore, the Urban Crossroads study underestimates the trip generation of the existing on-site land uses.

Trip Reductions

The trip generation rates used in the Urban Crossroads traffic study were based on the data found in the *Trip Generation Manual* as required by the City. The *Trip Generation Manual* represents a collection of trip rates from across the United States – most of which reflect suburban, single-use projects that experience little transit or walk-in patronage. Indeed, the data collected for the *Trip Generation Manual* is intended to document the peak automobile generation of each individual land use and, typically, the suburban projects do just that.

However, many projects in Santa Barbara do not behave as single-use suburban developments, and therefore it is appropriate and more accurate to adjust the trip generation rates accordingly. For example, commercial projects along the oceanfront have traditionally received a 25 percent reduction from suburban rates to reflect the pedestrian nature of the State Street/Cabrillo Boulevard corridors.

Visitor-serving projects along State Street and Cabrillo Boulevard corridors are well served by transit and shuttle service, and it is appropriate to assume that the well-utilized shuttle system would serve hotel and retail land uses along these corridors. Again, the suburban trip generation rates found in the *Trip Generation Manual* would not reflect the service offered by the State Street shuttle.

Finally, the Urban Land Institute in its publication *Shared Parking* documented that visitors to a mixed-use project tend to visit more than one land use in the project during a single visit. This capture of multiple trips tends to reduce both the number of trips and the parking requirements of mixed-use projects. Multiple visits in the range of 20-70 percent were found in the ULI study.

The first two trip reduction factors above (walk-in and shuttle) would apply to both the existing and proposed land uses while the third (mixed-use project) would only apply to the proposed project.

The trip reductions applied by Kaku Associates were approved by the City Transportation Division staff prior to their use in the study. They are reasonable and conservative. No additional trip reduction was taken for the mixed-use aspect of the project, and the walk-in and transit reductions are consistent with reductions approved by the City for other projects in the area.

The Urban Crossroads analysis used the incorrect definition of existing on-site land uses and it failed to take into account legitimate and well-documented trip reductions. Therefore, the Urban Crossroads analysis incorrectly underestimates the number of existing trips and overestimates the number of trips from the new project. The City believes that the trip generation estimate in the Kaku Associates report reflects a more accurate estimate of the net trip generation of the proposed

project. Given this, we do not agree with the Urban Crossroads conclusion that the project would impact the intersection of Garden Street/US 101 northbound Ramp.

Traffic Signals Warrants

We agree with the statements in the Urban Crossroads letter regarding traffic signal warrants. The City believes that the traffic and pedestrian activity generated by the new project would warrant a new traffic signal at Mason Street/State Street, and therefore a warrant analysis was not required.

When the warrant is met, the signal (and any other warranted signal on Cabrillo Boulevard) would be installed consistent with the City's ability to fund the installation. In the case of the proposed project, the Mason Street/State Street signalization would be a recommended condition of the project and therefore would be installed consistent with warrants.

Pedestrian Crossings of State and Mason Streets

We concur with the comments of Urban Crossroads. Additional pedestrian crossings of both State Street and Mason Street would be generated by the project and the intersection and mid-block crosswalks proposed by the project are intended to accommodate the increased activity. As pointed out by Urban Crossroads, the crosswalks are typical treatments in urban areas.

E-6. Your comment is noted and will be forwarded to City decisionmakers.

March 22, 2001

RECEIVED
MAR 22 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Planning Commission
Debra Andalaro, Project Planner
City of Santa Barbara
630 Garden Street
P.O. Box 1990
Santa Barbara, CA 93102-1990

Re: Proposed La Entrada de Santa Barbara Project

Dear Planning Commissioners and Staff,

This letter is submitted by the Environmental Defense Center (EDC), on behalf of the Citizens Planning Association of Santa Barbara County, Inc. (CPA) and the League of Women Voters of Santa Barbara (LWVSB), regarding the Draft Environmental Impact Report (EIR) for the La Entrada de Santa Barbara project (Entrada project). The purpose of this letter is to provide comments on the draft EIR pursuant to the California Environmental Quality Act (CEQA), Pub. Res. Code §§ 21000 *et seq.*, 14 Cal. Code Regs. ("CEQA Guidelines") §§ 15000 *et seq.*

I. THE CITY MUST CONDUCT SUBSEQUENT ENVIRONMENTAL REVIEW ON NEW INFORMATION SHOWING SIGNIFICANT IMPACTS.

F-1 Since the City is conducting a de novo hearing on the proposed Entrada Project, the City must conduct subsequent environmental review on water and biological resources, traffic and circulation, and public services, such as safety and emergency response. Some of these issues were raised during the scoping process for the draft EIR. However, thus far, the City has failed to conduct the required environmental review pursuant to CEQA.

B. A. CEQA Requirements

F-2 CEQA requires subsequent environmental review of potential impacts when any further discretionary approval is required for a proposed project. CEQA Guidelines § 15162(d). After an EIR or negative declaration has been certified for a project, such as the May 1999 Mitigated Negative Declaration (MND) for the proposed Entrada project with respect to the non-view environmental issues, a subsequent EIR shall be prepared when substantial evidence shows 1) substantial changes in the proposed project, 2) substantial changes in the circumstances, or 3) "new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time" the previous environmental review document was adopted, showing any of the following:

906 Garden Street
Santa Barbara, CA 93101
Phone (805) 963-1622
FAX (805) 962-3152
edc@rain.org

2021 Sperry Avenue, Suite 18
Ventura, CA 93003
Phone (805) 677-2570
FAX (805) 677-2577
edcvent@west.net

864 Osos Street, Suite A
San Luis Obispo, CA 93401
Phone (805) 781-9932
FAX (805) 781-9384
edcmal@west.net

1. The project will have one or more significant effects not previously analyzed;
2. Significant effects previously examined will be substantially more severe;
3. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
4. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental review document would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines § 15162(a). "If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency **shall** prepare a subsequent EIR" when any of the above showings are made. CEQA Guidelines § 15162(b).

F-2 cont.

C. Evidence Requiring Subsequent Environmental Review

Evidence warranting subsequent environmental review in this case includes: 1) the Local Planning Guidance on Tsunami Response, 2) the Urban Crossroads Traffic Study, and 3) the U.S. Army Corps of Engineers (ACOE) Mission Creek Flood Control Project. This evidence shows substantial changes in the circumstances and the proposed project and new information on significant environmental impacts that was not known and could not have been known with the exercise of reasonable diligence in August 1999 when the City certified the MND for the Entrada project. Finally, substantial evidence shows that the proposed project will have significant effects on water and biological resources, traffic, circulation and safety, which were not previously analyzed.

The Local Planning Guidance on Tsunami Response constitutes new information, which was not known and could not have been known with the exercise of reasonable diligence at the time the MND was adopted. (See Exhibit A.) After the City certified the MND with respect to traffic, circulation and safety in August 1999, the Governor's Office of Emergency Services released the Local Planning Guidance on Tsunami Response to enable decisionmakers "to understand the risk and be proved with mitigation tools in order to make informed planning decisions." The Governor's office also announced workshops beginning in March 2000. This information shows that the proposed project will have significant effects on traffic, circulation and safety, which were not previously analyzed. The complete document and testimony provided at the Planning Commission hearing also show that mitigation measures or alternatives regarding proposed traffic

improvements would substantially reduce significant effects on the environment. This evidence was not discussed in the previous environmental review document, yet shows significant effects on traffic, circulation, and safety. As a result, the City must conduct environmental review on traffic, circulation and public services by identifying and assessing adverse impacts and alternatives and mitigation measures to reduce those impacts.

Following from the new information regarding local planning on tsunami response and the evidence of significant effects on traffic, circulation, and safety, CPA and LWVSB submit additional new information on traffic and circulation. The Urban Crossroads Traffic Study is a traffic analysis prepared by John Kain, a transportation planning, traffic engineering, and traffic impact expert. (Exhibit B.) In sum, the study shows significant impacts on traffic and circulation, which were not identified in the MND and which are inconsistent with City policies. Therefore, the EIR should identify and assess the adverse impacts on traffic and circulation and identify project alternatives and mitigation measures to reduce those impacts.

F-2 Finally, evidence regarding Mission Creek widening also warrants subsequent analysis in the EIR, because it shows substantial changes in the circumstances in and adjacent to the proposed Entrada project area, necessitating substantial changes in the project on site A. The U.S. Army Corps of Engineers (ACOE) finalized the Mission Creek Flood Control Project after the City's certification of the MND in August 1999. Specifically, the ACOE selected Alternative 12 in the EIR/EIS which was released in December 1999. Alternative 12 includes the demolition of the buildings at 15 West Mason Street (previously part of the Entrada project) and includes widening Mission Creek at least 30 feet towards the Entrada project area. The August 1999 MND failed to analyze the possibility of the ACOE's proposed project, because, at the time, it was too speculative. The evidence shows that the proposed Entrada project will have one or more significant effects on water and biological resources not previously analyzed. (See attached Exhibit C.) Therefore, the draft EIR should identify and assess the adverse impacts and identify project alternatives and mitigation measures to reduce those impacts.

The failure to conduct environmental review on the ACOE's Mission Creek Flood Control Project which changes the width of the river directly adjacent to the proposed Entrada project site constitutes improper piecemealing. CEQA mandates ". . . that environmental considerations do not become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences." Bozung v. Local Agency Formation Comm. (1975) 13 Cal.3d 263, 283-284 [99 Cal.Rptr. 745]. Consequently, our clients urge the City to conduct environmental review on water and biological impacts on Mission Creek.

II. THE DRAFT EIR MUST ANALYZE POLICIES BASED ON PLAIN LANGUAGE AND SUBSTANTIAL EVIDENCE ON VIEW IMPACTS.

F-3 The draft EIR section 3.0 on land use and policy considerations is misleading, fails to analyze policies based on their plain language, and fails to analyze substantial new evidence on adverse and significant view impacts.

A. The Draft EIR Policy Section is Misleading

The draft EIR policy section is misleading because 1) the policy section improperly infers that the Planning Commission and City Council appropriately found the proposed project consistent with law, and 2) the policy section fails to incorporate the substantial new information on adverse and significant impacts provided in the draft EIR's public view analysis.

First, our clients case and the City's proceedings are still under the jurisdiction of the Santa Barbara Superior Court, pending the City's compliance with the terms of the May 26, 2000 Judgment in Citizens Planning Association of Santa Barbara County, et al. v. City of Santa Barbara, et al., Santa Barbara Superior Court Case No. 232741, May 26, 2000. In addition, since the Court vacated the approval of the Entrada project, the Court stayed the claims alleging violations of the General Plan, the Local Coastal Plan, California Planning and Zoning Law, the Coastal Act and the Municipal Code. This F-4 means that the Court has not yet decided whether the City's approval of the proposed Entrada project violates local plans and policies on views or any other issue area. The Court only decided that no fair argument was made regarding a potential for an environmental impact due to inconsistencies with particular policies based on the evidence in the previous administrative record. That is not the same as a finding of consistency.

Second, the Court set aside the approval of the Entrada project. As a result, a de-novo hearing is required and new findings of consistency based on substantial evidence in the record are required, as well. In addition, the Court ordered that the City prepare an EIR on potential view impacts. An EIR "is a detailed statement prepared under CEQA describing and analyzing the significant effects of a project and discussing ways to mitigate or avoid the effects." (CEQA Guidelines § 15362; Pub. Resources Code § 20161.) "The EIR must contain facts and analysis, not just the bare conclusions of a public agency." Santiago Water District v. County of Orange (4th Dist. 1981) 118 Cal.App.3d 818, 831.

B. Plain Language and Substantial New Evidence of Adverse And Significant View Impacts

F-5 The analysis of policy consistencies should reflect that an adverse view is inconsistent with the applicable policies. Although the evidence in the record reflects substantial evidence of significant impacts on views, if the draft EIR is not revised to reflect significant impacts, then, at the very least, it must be revised to find policy inconsistencies due to "adverse" impacts. Without such revisions, the decisionmakers will make improper findings under CEQA and local visual resource policies and may be unable to review alternatives to the proposed project. (See Exhibit D.)

F-6 The City's failure to provide evidence of consistency with all plans and policies, and the City's reference to other policies as a defense for non-compliance with others does not constitute compliance with the law.[1] The following comments include: 1) policies not addressed, 2) policies which are misapplied based on common principles of interpretation, and 3) policies which lack any evidence of consistency.

1. Coastal Act

F-7 The draft EIR improperly concludes that the proposed project is consistent with California Coastal Act section 30251. Coastal Act section 30251 states that scenic and visual qualities of coastal areas shall be protected as a resource of public importance. Permitted development must protect views to and along the ocean and scenic coastal areas, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

The draft EIR only refers to the "shoreline," instead of the "coastal areas," as required by the Coastal Act. Coastal areas in Santa Barbara include the Waterfront area of Santa Barbara and obviously, the entire "coastal zone" of the City of Santa Barbara. The draft EIR also describes the "utility lines" to infer that under grounding of utility lines will restore visual quality even though substantial blockage of the view will occur. However, under grounding of utilities is a requirement for nearly every project in the City. The draft EIR completely lacks the relevant description of the views of the foothills and mountains and a consistency analysis with the language of section 30251 of the Coastal Act.

F-8 Views and potential impacts from important viewpoints that must be analyzed in the draft EIR include the following:

- view 2 (loss of ridgeline between San Marcos Pass and Arroyo Burro from Dolphin Fountain on Stearns Wharf);

[1] It is misleading to suggest that addressing particular policies, while ignoring others, is improper. The Entrada Project may be consistent with some local plans and policies. However, consistency with some policies does not justify the failure to comply with other policies.

F-8
- view 3 (loss of foothill views, ridgeline between San Marcos and Arroyo Burro from Cabrillo Blvd at Stearns Wharf);
- view 4 (loss of foothill views from Cabrillo Blvd);
- view 5 (loss of views of San Marcos Pass, foothills, entire ridgeline between pass and Montecito, La Cumbre Peak, Cathedral Peak from the corner of State Street and Cabrillo Blvd);
- view 6 (loss of views of San Marcos Pass, foothills, entire ridgeline between pass and Montecito, La Cumbre Peak, Cathedral Peak from the corner of State Street and Cabrillo Blvd);
- view 7 (loss of mountain peak and ridgeline views in an existing view corridor from State Street);
- view 8 (loss of views of ridgeline, La Cumbre Peak and Cathedral Peak from State Street and California Hotel);
- view 9 (loss of views of ridgeline from San Marcos Pass to La Cumbre Peak, foothills, La Cumbre Peak and Cathedral Peak, ridgeline along Montecito Peak from State and Mason Streets);
- view 10 (loss of view corridor from State Street);
- view 11 (loss of view of open sky and trees indicating ocean front from railroad depot);
- view 13 (loss of view of open sky and trees indicating ocean front from Yanonali Street);
- view 14 (loss of view of open sky and trees indicating ocean front at end of State Street from 101/State Street overpass);
- view 16 (loss of view of foothills and open sky indicating ocean front from Mason Street and Mission Creek Bridge);
- view 17 (loss of open sky and trees indicating ocean front from Helena and Mason Street); and
- view 18 (loss of open sky and trees indicating ocean front from 101).

Finally, the analysis admits loss of views from State Street and Cabrillo Boulevard which are in the coastal zone and waterfront area, as a whole, yet improperly concludes with a finding of consistency with Coastal Act Section 30251.

2. General Plan

F-9 The draft EIR improperly concludes that the proposed project is consistent with the General Plan. The substantial new evidence of adverse and significant impacts described above in the Coastal Act section is incorporated herein, and the following discussion comments on the plain language of the General Plan.

While the Scenic Highways Element is properly described, the policy only permits building separation as a method of providing views, if setbacks are also included. In this case, the project is not within the required setback. Additionally, the draft EIR fails to

read the plain language of the General Plan which specifically refers to the policies in the Local Coastal Plan as providing more detail which should be incorporated in the General Plan. Accordingly, the following discussion will highlight the inconsistencies with the General Plan and then, the Local Coastal Plan.

General Plan Conservation Element Policy 3.0 states that 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. The draft EIR, however, attempts to limit that policy in two ways: 1) by focusing on a misinterpretation of the Conservation Element Text Discussion and 2) by failing to refer to the LCP, as required by the Implementation Strategies.

F-9

The City's misinterpretation of the Conservation Element Text Discussion is apparent by its plain language. If "lower elevations of the City" is only meant to refer to the "beach and Cabrillo Boulevard," as the draft EIR suggests, then Policy 3.0 would be redundant by referring to the ocean and the beach and Cabrillo Blvd. Therefore, "lower elevations of the City" properly refers to the Waterfront area, including project area. Moreover, according to the plain language, "including" views of the upper foothills and mountains from the beach and lower elevations of the City does not exclude views from other viewpoints. Finally, the Entrada project area is one of the lowest areas of the City, as evidenced by the flooding problems and elevation of the project area.

The application of Conservation Element 3.0 also fails to refer to the LCP to preserve and enhance coastal resources, as required by Implementation Strategy 3.3.

3. Local Coastal Plan

The draft EIR improperly concludes that the proposed project is consistent with the LCP. This section provides comments on the plain language of particular LCP policies and addresses additional LCP policies, which must be discussed in light of the new information on adverse and significant impacts.

a. LCP Policy 9.1

F-10

The draft EIR admits adverse impacts to views from Cabrillo, Stearn's Wharf and State Street. According to LCP Policy 9.1, existing views to, from, and along the ocean and scenic coastal areas shall be protected, preserved and enhanced. The policy provides examples on how to protect views, while also requiring the development of additional standards of acceptable view protection. Hence, the Waterfront Area Aesthetic Criteria for New Development Assessment and Waterfront Area Design Guidelines provide further guidance for protecting, preserving and enhancing existing views.

The Waterfront Area Design Guidelines specifically state that vistas of the ocean, harbor and mountains from Cabrillo Boulevard and State Street must be maintained. According to the Guidelines, "Cabrillo Boulevard, running the length of the Waterfront District is a potential State Scenic Highway. State, Garden and Castillo Streets are other important arterial streets in the Waterfront area." The Guidelines also reiterate some methods for maintaining views, while not precluding other methods, as well. Consequently, according to the plain language, the LCP and General Plan policies include both Cabrillo and State Street as important viewpoints in the Waterfront area.

The Waterfront Area Aesthetic Criteria provides additional guidance on the evaluating the intensity of new development when reviewing consistency with protecting, preserving and enhancing existing views to, from, and along the ocean and scenic coastal areas. "Protect" means that "the dimensions are incorporated into project design to a degree that defends or guards against damage or injury to the existing ambience of the area." "Enhance" means that "the dimensions are incorporated into a project design that raises to a higher degree, intensifies or raises the value of the visual qualities of the area." "Preserve" is not defined by the Criteria, but the common meaning is to conserve, protect, and maintain.

F-10

The aesthetic criteria defines the Waterfront as the area from Pershing Park and the Harbor and Milpas Street, including Stearn's Wharf, and evaluates impacts based on openness, lack of congestion, naturalness, and rhythm. In particular, the aesthetic criteria describe one-story buildings and the palm trees along Chase Palm Park as enhancing the openness of the Waterfront. Views are the most important dimension of naturalness in the Waterfront area. Views are to the ocean, other points along the Waterfront, and to the foothills and mountains.

The draft EIR improperly suggests that providing a particular view corridor from a particular viewpoint on State Street is sufficient to find consistency with Policy 9.1, the Waterfront Aesthetic Criteria, and the Design Guidelines. The policy discussion also fails to point out that the actions require "additional" building limits and "additional" setback requirements, rather than keeping within the existing height limits and providing modifications to encroach into the existing required setbacks. Moreover, the discussion fails to analyze how a limited view corridor, which fails to provide any view of the significant visual resources, is sufficient to justify the otherwise total loss of views. By admitting adverse impacts, or "loss of views of Santa Ynez Mountains and foothills from viewpoints along State Street," the draft EIR is merely conclusory in its statements regarding view corridors.

Finally, the discussion fails to confront the adverse and significant view impacts from Cabrillo Boulevard and Stearn's Wharf. Substantial evidence in the record shows adverse and significant impacts from several viewpoints along Cabrillo Boulevard,

F-10 Stearn's Wharf, and admittedly from most viewpoints along State Street, which are ignored in the draft EIR.

b. Other LCP policies

F-11 Based on the substantial new evidence of adverse and significant impacts, consistency with other LCP policies must be analyzed, as well. LCP Policy 9.5 addresses screening of parking facilities from public view. LCP Policy 9.8 states that the City shall seek to preserve the unique scenic and aesthetic quality of Highway 101. LCP Policy 12.2 requires that new developments within the City's Waterfront Area shall be evaluated as to a project's impact on the area's openness, lack of congestion, naturalness, and rhythm. Specifically, "openness" is described as "minimizing visual impacts of building density, scale, mass, and height." "Naturalness" is described as protecting views to the foothills and mountains within view corridors along Cabrillo Boulevard and protecting view corridors from excessive development "which detract the natural dominance of these views." (LCP, p. 192-193.) Based on the evidence in the record, consistency with these policies must be analyzed.

4. Waterfront Visioning Report Theme IA

F-12 The draft EIR improperly concludes that the proposed project is consistent with Theme IA of the Waterfront Visioning Report. Theme IA provides a very clear policy to maintain the beautiful vistas and sweeping views of the ocean and mountains. In particular, the action steps provide guidance on how to achieve consistency with the report's view policy.

Step 2 requires protection of views, view corridors and vistas, a distinction which is completely ignored in the draft EIR description of the environmental baseline. Instead, the draft EIR alleges that creating a view corridor is the same as protecting a view, an assumption that is contradicted by most of the City's view protection policies. Views, view corridors and vistas must be individually described and individually analyzed to ensure that each is protected. In addition, although step 2 suggests "lower height limits and greater setback requirements" to ensure preservation of views, the draft EIR fails to discuss this distinction.

Step 2 also suggests that the City create an inventory of the views from the Waterfront. If the City does not initiate this process, then, at the very least, an inventory of the existing views, which will be impacted by the proposed Entrada project, must be made and described in the environmental baseline section of the draft EIR. The inventory of existing views must include a full description of the foothill, Santa Ynez Mountain, ocean and Mesa views from the Waterfront area. The failure to describe these existing views is inconsistent with CEQA's requirements regarding environmental baseline.

Moreover, without such an inventory, the City is losing the existing views that the Visioning Report intended to inventory.

F-12 Step 4 calls for a review of setback and height rules in "critical view corridors" for consistency with the Vision's policy to maintain sweeping view of the mountains. More importantly, the implementing option specifies that view corridors on or near State Street are those viewpoints considered vital and appropriate for "lower height limits and increased setbacks." The City has not yet reviewed these critical areas and instead, continues to approve development in these critical areas on a case-by-case basis. The loss of views from these critical areas and the failure to lower height limits and increase setbacks is most evident with respect to the proposed Entrada project.

In sum, the draft EIR fails to distinguish between existing views, view corridors, and vistas and omits guidance on enforcing stricter standards to preserve these critical resources from the Waterfront Area. The City's development of standards on a case-by-case basis fails to implement the Vision and will result in the loss of views which were intended to be inventoried. Substantial evidence in the record shows adverse and significant impacts on existing views, view corridors and vistas and lack of compliance with existing setback requirements.

5. Santa Barbara Municipal Code

F-13 The draft EIR fails to discuss consistency with the Santa Barbara Municipal Code sections relating to visual resource protection. One example is Municipal Code section 28.87.200(5) which addresses blockage of views by planting and landscape plans. This requirement is not discussed in the draft EIR. According to the evidence in the record, proposed vegetation threatens to block views of the foothills, mountains, and ocean.

III. THE CITY MUST REVISE AND RECIRCULATE A DRAFT EIR WITH A LEGALLY APPROPRIATE DESCRIPTION OF THE ENVIRONMENTAL BASELINE AND IMPACT ANALYSIS.

F-14 According to CEQA and the CEQA Guidelines, the public view analysis in the draft EIR is entirely inadequate. The analysis fails to provide decisionmakers and the public with a consistent and objective analysis upon which to follow and to enable intelligent consideration of potential changes to public views from the proposed project. In fact, the draft EIR does not consider potential changes to public views, but, instead, spends considerable effort judging whether public views are important. Even if a view is judged to be important, the draft EIR does not consider potential changes to public views, but rather makes conclusory findings of no significant impact. Consequently, in a practical sense, the EIR fails to meet its basic function as a technique for fact-finding and collectively reviewing and evaluating baseline conditions and project impacts through a process of full disclosure.

F-15 The draft EIR specifically states that one of City's primary objectives in the development of this project site is to "maintain the expanse of views and feelings of openness." (Draft EIR at ES-2.) Therefore, this primary objective must be consistent with the ultimately approved project in this case. Some initial comments on the public view analysis and why that primary objective is not satisfied are provided here. Additional comments and analysis submitted by a reputable independent view expert, Mr. Lawrence Headley, provide more detail on the draft EIR's inadequacies and the substantial evidence showing an adverse and significant impact on views as a result of the proposed project.

A. Definitions

F-16 Several concepts, which are used to analyze impacts, are not defined in the draft EIR. For example, "scenic" is not defined, yet used throughout the draft EIR as a basis for alleging views are not important. Similarly, the phrase "visual expectations" is not
F-17 defined, yet referred to throughout the draft EIR as justification for permitting a significant impact on views. Finally, "heavily visited viewing areas" is both not defined
F-18 and inconsistent with the requirement that the draft EIR analyze impacts on "public views."

F-19 On the other hand, several definitions should be added to better reflect the valuable aesthetic resources which exist in the Waterfront area. For example, "sensitivity" should be used and defined to reflect the public's critical concerns regarding the beautiful foothill and mountain views which presently exist and which may be lost.

B. Existing Setting

F-20 The draft EIR does not adequately describe the existing views in the affected area. An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time that environmental review commences. CEQA Guidelines §15125(a). In the regional setting, "special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project." CEQA Guidelines §15125(c). In assessing the impact of a proposed project on the environment, the City should normally limit its examination to changes in the existing physical conditions in the affected areas as they exist at the time environmental analysis is commenced. CEQA Guidelines §15126.2(a). Unless the draft EIR is revised to accurately describe the existing views around the proposed project areas, the draft EIR fails to provide decisionmakers with the proper baseline upon which to measure changes to the views as a result of the proposed project.

In this case, the draft EIR's alleged sole purpose is to analyze view impacts. Yet, the document improperly focuses on the "affected area," instead of the existing views.

F-21 The existing view baseline in this case includes the existing visual resources and views from public places in the Waterfront. Existing views not only include the "Santa Ynez Mountains," "foothills," "Riviera," "ocean," and "mesa," generally, but they also include existing visual resources, such as "San Marcos Pass" and "Arroyo Burro Road" areas of the mountains, La Cumbre Peak, Cathedral Peak, Montecito Peak, rock outcroppings, vegetation, the ridgeline of the foothills, the architecture in the foothills, the ridgeline of the mountains, the open sky, and the palm trees indicating the ocean or shoreline, specifically. Moreover, the affected area, including the public places and uses must include uses by the citizens of Santa Barbara, the local residents, the local commuters, the local artisans, and the local people who walk and recreate in the proposed project area.

F-22 The existing setting section of the DEIR which allegedly describes lower State Street is inaccurate and misleading. First, it omits relevant existing photographs from lower State Street, while including other photographs from viewpoints which are irrelevant to the instant case. In fact, because the existing setting section omits view photographs from lower state street and most of the concerned area, in general, the
F-23 description is particularly suspect. Moreover, the reference to admittedly expansive views as "intermittent glimpses" is inaccurate and rebutted by the evidence in the record. The description improperly emphasizes utility lines which describe the affected area
F-24 when the view primarily consists of continuous foothills and mountains. The description of the existing setting as already degraded also improperly sets the stage for a misapplication of CEQA in the impact analysis. Finally, the language used to describe
F-25 views is inaccurate and attempts to downplay the importance of the views and visual resources. For example, the ridgeline is prominent, clear, and continuous, rather than "generally discern[able]." The existing baseline must be revised to reflect the existing views and visual resources, pursuant to CEQA.

C. Existing Public View Plans and Policies

F-26 The above discussion on local plans and policies is incorporated herein by reference and must be reviewed for consistency in light of the substantial new evidence of adverse and significant impacts. CEQA Guidelines §15125(d). In addition, the draft EIR section 4.2 references a discussion on positive and negative view elements in the LCP, but contains some omissions. For example, the draft EIR omits mountains from the positive view elements listed in the LCP. The draft EIR also omits the LCP's discussion on how to determine positive or negative views. Contrary to the draft EIR's inference that a utility pole makes a negative view, the LCP suggests that a view that is desirable may have a "minor view impairment, such as a utility pole," but by changing the observer's position or by eliminating the pole, the view becomes improved. The draft EIR is directly inconsistent with this evidence on conducting view analysis in the LCP.

D. Analytical Methodology

F-27 The draft EIR methodology fails to set forth objective criteria, improperly sets forth criteria reflecting the existing baseline in the impact analysis, and inconsistently applies the methodology criteria to the view impact analysis.

1. Thresholds of Significance

The City's approach for determining significance on a project-by-project basis and use of different thresholds at different times for the same project warrants strict scrutiny and stands as a faulty basis on which to approve the Draft EIR for the proposed Entrada project. In addition, the public has a right to participate in the development of objective thresholds through a public process.

F-28 CEQA requires all public agencies to adopt "objectives, criteria, and procedures for the evaluation of projects and the preparation of environmental impact reports and negative declarations." Pub. Resources Code § 21082. The CEQA Guidelines promote the use of standards and thresholds that have been adopted through a public process to protect the environment as the means for determining the significance of project impacts.

F-29 Where an applicable standard or threshold exists, an environmental change which fails to comply with that standard or threshold would be considered significant. CEQA Guidelines §§ 15064(h), 15064.7.

In this case, the City clearly used a particular threshold during the Mitigated Negative Declaration (MND) process and is attempting to establish a new threshold through the Draft EIR process in an apparent effort to justify its conclusion of no significant impacts. The May 1999 MND for the proposed Entrada Project states that "**a City standard has been established** such that it is determined that a project could have a significant impact on aesthetic and visual resources" if it will conflict with twelve listed thresholds of significance. (Exhibit E: "Aesthetics" section of the MND.) Since an inconsistency with any of the City's original standards provides substantial evidence of a significant impact, four thresholds are reiterated here as areas of particular concern:

F-30

1. Conflict with applicable vista protection standards, scenic resource protection requirements, or design criteria of the City;

2. Alter or obstruct existing public viewsheds from across the project site, including scenic features associated with designated or potential scenic highway;

3. Be inconsistent with LCP policies regarding visual resources; and

4. Be inconsistent with the City of Santa Barbara Waterfront Area Design Guidelines and Waterfront Area Aesthetic Criteria for New Development Assessment.

F-30 According to the City, these thresholds of significance reflect an "established" City standard for determining impacts.

In the present environmental review document, the analytical methodology is inconsistent with the City's established standard for determining significant impacts and apparently, newly developed. The impact analysis in the Draft EIR involves a two step method. Step one assesses the importance of public views and view corridors. This process is not based on any particular law or policy and is, in fact, improper application and analysis of the environmental baseline under CEQA. The Draft EIR's use of

F-31 "magnitude" to describe the existing views from the project area trivializes the project's impacts. Moreover, step one substantively changes local policies without adhering to the proper public process for changing local policies, such as amending the General Plan or Local Coastal Plan. By substantively changing the views that the citizens of Santa Barbara previously chose to protect, preserve and enhance, step one is an effort by City staff to completely eliminate most views from consideration before even reaching step two of the new City process.

Step two assesses the significance of project changes to important public scenic views, or in other words, to those views which were not eliminated in step one. This process establishes the new thresholds of significance by adding a new finding requirement that the project would conflict with policies or alter or obstruct existing

F-32 views by "substantially degrading" or "substantially blocking" an "important public scenic view" or "substantially impairing the visual context of the Waterfront area." In so doing, the new thresholds incorporate step one, which is not based on law or policy and which substantively changes the policies, into step two, which requires substantial degradation, blockage or impairment.

In sum, the City is developing thresholds on a case-by-case basis and changing the

F-33 thresholds used to determine significant impacts from the proposed Entrada project in an effort to justify a finding of no significant impact. Although the MND stated that "a City standard has been established," the Draft EIR fails to apply the same standard and instead, establishes a new standard which was not developed through a public process and which is improper pursuant to CEQA. This inconsistent application of thresholds of significance is suspect, misleading to the public, and a faulty basis upon which to measure impacts. Finally, the analytical methodology reflects a misapplication of CEQA.

2. View Impact Analysis and Evidence of Significant Impacts

F-34 The draft EIR wrongly concludes that the project's environmental impacts will be insignificant, rather than significant. The view impact analysis lacks credibility and substantial evidence on which to base a finding of no significant impact. Courts require agencies to produce **credible** analysis and substantial evidence in light of the whole record before upholding EIR determinations that project impacts are insignificant. CEQA

defines substantial evidence as including "fact, reasonable assumption predicated upon fact, or expert opinion supported by fact. Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly erroneous..." Pub. Resources Code §§ 21080(e)(1)-(2), 21082.2(c). Based on the erroneous conclusion that impacts are insignificant, the draft EIR fails to identify and focus on the significant environmental effects, unavoidable significant environmental effects, and significant irreversible environmental changes which may result from the proposed project. CEQA Guidelines §15126.2.

F-34

The City's conclusions that impacts are insignificant either reflect a misapplication of CEQA, or are unsupported by substantial evidence. For example, the draft EIR's treatment of views and its conclusion that impacts would be insignificant is flawed. As noted above, the City improperly assumes that, because views are already degraded, the incremental encroachments or total blockage from the project must be treated as minor. Again, the draft EIR's analysis improperly uses the magnitude of the existing views from the project area in order to trivialize the project's impact.

F-35

All references to the "View Angle Analysis" mislead the decisionmakers and public by suggesting that a one story project has been analyzed and has been found to not block views. The limitations on this finding are not discussed (i.e. the view may be blocked from a one story building only from a very specific viewpoint and the view may not be blocked from a one story building from every other viewpoint), and the analysis is rebutted by evidence in the record. Photographs of one story buildings show that a one story building does not similarly impact views. Moreover, in an effort to justify no cumulative impacts, the City admits that projects which are one story or less are "too small...to have any possible demonstrable impact on important public scenic views of the Santa Ynez Mountains or the Waterfront." (Draft EIR, p. 4-115.)

F-36

The analytical methodology does not provide a basis for most of the methodology that is applied in the impact assessment. For example, the analytical methodology does not provide for "weighing" the importance of views amongst each other or for defining an "important view" versus a "more important view." However, the analysis in the draft EIR weighs the importance of views and uses "more important" views as justification for an impact on admitted "important views." Therefore, the methodology is either inconsistently applied or not applied throughout the draft EIR.

F-37

View 2: Looking Up State Street From Dolphin Fountain

This analysis admits an adverse affect on an important public scenic view, but justifies the view blockage by introducing three new criteria for determining whether an impact is significant. These criteria include 1) whether the intrusion is interrupted, 2) whether the viewer can turn to look at a different view, and 3) whether the impact is

F-38

consistent with visual expectations. Clearly, these criteria are not the same as "substantially degrade," "substantially block," or "substantially impair" as set forth in step two of the methodology.

F-38

Substantively, the project blocks most of the ridgeline, including the Painted Cave and Arroyo Burro areas. Moreover, the City's statement that the view is interrupted from an existing structure, palm trees and street light is not only a misapplication of CEQA, but is directly inconsistent with the City's statement that a 100 square foot building and light post is too small to have any possible demonstrable impact on important public scenic views of the Santa Ynez Mountains or the Waterfront and that palm trees are an important visual resource. (Draft EIR, p. 4-115.) Finally, a total blockage above the project area of an important public scenic view, as evidenced by the photograph simulations, constitutes substantial evidence of a significant impact. The blockage is also evidence of inconsistency with applicable policies.

F-39

View 3: Looking Toward Area B From Southwest Corner of State Street/Cabrillo Blvd
View 4: Looking Across Harbor View Inn from Cabrillo

These analyses admit an adverse affect on an important public scenic view, but justify the view blockage by introducing four new criteria for determining whether an impact is significant. These criteria include 1) whether the intrusion is interrupted, 2) whether the viewer can turn to look at a different view, and 3) whether the impact is consistent with this visual expectation, and 4) whether the project would "blend in with other existing development." Again, these criteria are not the same as "substantially degrade," "substantially block," or "substantially impair" as set forth in step two of the methodology.

F-40

Substantively, in view 3, the proposed project will block much of the ridgeline, La Cumbre and Cathedral peaks, and the foothill views from Cabrillo Boulevard. In view 4, the proposed project will block most of the foothill ridgeline from Cabrillo Boulevard. As stated above, the City's statement that the view is interrupted constitutes a misapplication of CEQA and is directly inconsistent with other statements in the draft EIR. (See i.e. Draft EIR, p. 4-115.) Finally, the total blockage of an important scenic view constitutes substantial evidence of a significant impact and is inconsistent with applicable policies.

F-41

View 5: Looking Toward Area B From Northwest Corner of State Street and Cabrillo Boulevard
View 6: Looking Toward Area B From West Side of State Street at Mission Creek Bridge

These analyses admit an important scenic view, but introduce new criteria of "more important view," or weighing the importance of views, for both steps of the two step methodology. Other new criteria include 1) whether the intrusion is interrupted, 2)

F-42

F-42 whether the viewer can turn to look at a different view, and 3) whether the impact is consistent with this visual expectation. These criteria are inconsistent with the methodology set forth by the draft EIR.

F-43 Substantively, the proposed project will block views of San Marcos Pass, the foothills, the entire ridgeline between the pass and Montecito, including La Cumbre and Cathedral peaks, from the corner of State Street and Cabrillo Blvd. However, the discussion in view 6 includes reference to irrelevant views, such as Stearn's Wharf, from this viewpoint. The analysis fails to apply the magnitude and distinctiveness criteria for determining whether a view is important, although these criteria have legal limitations as described above. Moreover, view 5's description of the ridgeline as interrupted is rebutted by view 6's description of the same view as largely intact, or sweeping. Finally, the total blockage of an important scenic view constitutes substantial evidence of a significant impact and is inconsistent with applicable policies.

View 7: Looking Across State Street Through Area B Paseo
View 8: Looking Through Area C From Entrance of Californian Hotel
View 9: Looking East Across State Street and Mason Street

F-44 These analyses similarly illustrate the inconsistent application of criteria in the draft EIR. For example, if the new criterion, whether the viewer can turn and look at a different view, were analyzed with respect to view 7, important public scenic views are completely blocked. Moreover, these analyses fail to recognize the existing view corridors, which are protected by local policies, and the substantial degradation of those view corridors to peepholes, which constitutes a misapplication of CEQA. Finally, the discussions lack analysis of whether the impact is substantial.

F-45 Substantively, the proposed project will block views of significant mountain peaks, the foothills, and the ridgeline in an existing view corridor from State Street. This blockage of important public scenic views constitutes substantial evidence of a significant impact and is inconsistent with applicable policies.

View 10: Looking Through Area C From BeBop Burgers Restaurant

F-46 This analysis incorrectly concludes that the view is less than important based on new criteria, including 1) whether the intrusion is interrupted, 2) whether the view is experienced for a limited duration, and 3) whether the viewer can turn to look at a different view. Moreover, the suggested viewpoints used as justification for permitting adverse impacts are not analyzed for their own substantial loss of views. The discussion contains no analysis of magnitude or distinctness and the judgment on scenic quality, an undefined criteria, is rebutted by evidence in the record that a one story project and light pole has no effect on views. The draft EIR even admits massive changes to views 10 and

F-47 11. (Draft EIR, p. 4-110.) Finally, according to the evidence in view 12, view 10

F-47 constitutes a scenic view or view corridor. This blockage of important public scenic views constitutes substantial evidence of a significant impact and is inconsistent with applicable policies.

View 11: Looking Toward Areas C and B From City Railroad Depot
View 13: Looking Down State Street Toward Stearn's Wharf From Yanonali Street
View 14: Looking South on Montecito Street from U.S. 101/State Street Overpass
View 16: Looking Toward Area A from Mason Street and Mission Creek Bridge
View 17: Looking South on Helena Avenue from Mason Street
View 18: Looking Toward Entrada Project Site From US 101 West of State Street Bridge

F-48 These analyses illustrate the inconsistent application of new criteria, such as "interrupted" views. In addition, the new criterion of interrupted views from trees is inconsistent with later statements in the draft EIR that trees are a visual resource. (Draft EIR p. 4-118.) Similarly, the new criterion of "visual expectation" is inconsistently applied. For example, the draft EIR omits discussion on how the proposed project completely blocks the view of the waterfront associated with the "visual expectation" of open sky and trees indicating the ocean front from viewpoints, such as the railroad depot and U.S. 101. Moreover, the analysis fails to explain how the blockage of open sky and trees towards the ocean is justified by a different view of the mountain from a viewpoint which is not in the project area. The blockage of important public scenic views constitutes substantial evidence of a significant impact and is inconsistent with applicable policies.

F-49 In sum, the draft EIR erroneously concludes that the proposed Entrada project will result in adverse but less than significant impacts. The draft EIR should be redrafted to reflect Class I or Class II significant impacts.

3. Cumulative Impacts

F-50 The draft EIR's conclusion that the proposed Entrada project will not result in cumulative impacts is erroneous. The entire analysis fails to apply the CEQA standards for analyzing and determining cumulative impacts. Cumulative impacts are defined as two or more individual effects which, when considered together, are considerable or...compound or increase other environmental impacts. CEQA Guidelines § 15355; see also CEQA Guidelines §15130. Therefore, the cumulative impact section must be revised according to the requirements of CEQA.

F-51 The cumulative impact analysis contains inconsistent standards and conclusory findings of no impacts. The analysis also makes assumptions regarding distances of various projects and offsets from State Street, which are not based on fact or data. Finally, the analysis admits view blockage from the proposed project and view blockage from other projects, requiring a finding of cumulative impacts on views under the CEQA

F-51 Guidelines. The following comments provide several examples of the faulty cumulative impact analysis in the draft EIR.

F-52 Based on a legally appropriate description of the environmental baseline, views 8, 9, 10, and 11 should be included in the cumulative impact analysis. Moreover, following from the criteria not described in the methodology, yet used to justify project impacts, views 8, 9, 10, and 11 will be blocked if the viewer turns their head. In general, this new and undefined criteria is not only inconsistently applied within the view impact analysis, but between the view impact analysis and the cumulative impact analysis, as well.

F-53 The Draft EIR should be revised based on its admission that a project, which is one-story or less, and/or 600 square feet or less, is too small to have any possible demonstrable impact on important public scenic views of the mountains. In other areas of the draft EIR, the City alleges that a one story project and light poles are visually degrading and would block views. Based on the draft EIR's reasoning, the two and three story projects presented in the cumulative impact analysis will necessarily block views. In fact, the cumulative impact analysis both admits massive changes to views in the Waterfront area, yet erroneously concludes no cumulative impact.

F-54 With respect to view 2, the analysis is inconsistent by both admitting important visual resources, yet alleging that projects in that view "would not be viewed in any one important public scenic view corridor." Moreover, the analysis fails to discuss views 11, 13, 14, and 19 and improperly analyzes whether a proposed building would be blocked, rather than focusing on the views.

F-55 With respect to views 3 and 4, the issue is not whether buildings would "blend in with existing development." The issue is whether the impacts of past, present and future probable projects, when considered together, will compound or increase impacts. These views are particularly instructive on this point. Substantively, the third stories in projects 16, 17, 19 will block more views, although the discussion provides no analysis of the impacts. Finally, the draft EIR admits that project 11 blocks mountain views.

F-56 The impact analysis admits that views 5 and 6 are blocked, yet improperly justifies the blockage based on new criteria. These view impacts will be compounded by projects 15, 16, and 17, as shown in the cumulative impact analysis. Specifically, "as experienced from Cabrillo Boulevard and State Street, the projects would therefore obstruct only discontinuous segments of views." Even though this impact finding is consistent with the definition of a cumulative impact under CEQA, the draft EIR improperly concludes no cumulative impact.

F-57 In view 7, projects 17, 18, 19 are directly in the existing view corridor and the peephole created by the proposed Entrada project's substantial encroachments into that

F-57 corridor. (See figure 4-34.) However, the draft EIR fails to analyze this cumulative impact.

F-58 In sum, the cumulative impact analysis fails to apply the CEQA standards for determining cumulative impacts and admits cumulative impacts on views. The cumulative impact section must be revised and re-circulated for public comment.

IV. Project Alternatives and Mitigation Measures

F-59 Under CEQA, an EIR should provide decisionmakers with the information on significant impacts, identify mitigation measures to minimize the impacts, and describe reasonable alternatives to the project. In this case, the City pre-determined that no alternatives would be analyzed in the EIR. Based on documents obtained through a public records act request, the City summarized the public's scoping comments by subject matter and by speaker. Next to the public's comments on "alternatives," the City wrote that the public thinks the City is going to look at alternatives. Hence, the evidence shows that the City determined that no alternatives would be analyzed prior to preparing the draft EIR. This process violates the important and legally required environmental review process under CEQA and as ordered by the Santa Barbara Superior Court.

F-60 Since the City's conclusions are unsupported by substantial evidence and the evidence shows significant impacts, alternatives and mitigation measures must be provided in a draft EIR. Substantive comments on alternatives were provided during the scoping process and are incorporated herein as Exhibit F. The EIR must also identify a range of mitigation measures to offset any adverse impacts on views, such as minimizing the height of vegetation, eliminating third stories, incorporating required or additional setbacks, or maintaining four lanes on State Street. Since the draft EIR does not provide or analyze mitigation measures and alternatives, the decisionmakers and the public lack the information upon which to base an informed decision on the proposed Entrada project's impacts on views.

V. Outstanding Issues To Be Resolved

F-61 The City's findings on the EIR will be an important part of the review of the project on its merits. City staff acknowledges that the draft EIR is important to the merits of the project and the City's consistency findings. (Draft EIR p. ES-6.) The draft EIR specifically reiterates some areas of known controversy and issues to be resolved. The issues include whether the project's setbacks, building heights and elevations are acceptable for visual openness, whether the size, bulk and scale is appropriate, whether the project is compatible with the existing built environment, and whether the project reflects a small town ambiance, openness, lack of congestion, naturalness and rhythm. Unless the draft EIR properly assesses impacts and recognizes that both adverse and significant impact on views are inconsistent with view protection policies, the City may

F-61 be precluded from "negotiating" project changes as suggested during the Planning Commission hearing on March 15, 2001.

Other outstanding issues to be resolved include those raised at the California Coastal Commission hearings and are summarized as follows:

F-62
1. The suitability of time-shares rather than overnight hotel rooms;
2. The criteria and justification for the number of rooms;
3. The selection and description of special events;
4. Information on the managing unit;
5. Appropriate and legal setback from the top bank of Mission Creek, taking into account the ACOE project; and
6. Traffic and parking implications on the residential neighborhood to the west of the project area.

In addition, the following is a summary of the remaining issues stayed in the litigation in Santa Barbara Superior Court:

F-63
1. Incompatibility of size, bulk and scale with the residential neighborhood;
2. Adverse impacts on traffic and lack of traffic improvements in place at occupancy;
3. Less parking than required to fit needs;
4. Adverse impacts on water and biological resources in Mission Creek;
5. Incompatibility of time-share units with the Waterfront area, residential neighborhoods, and character of Santa Barbara;
6. Inconsistency with Measure E, including increased room square footage;
7. Encroachments into setbacks;
8. Overburden on existing residential neighborhoods.

F-64 Therefore, EDC, on behalf of our clients, strongly urges the City to resolve these outstanding issues during the process of preparing the EIR and staff report and through the public hearings on the Entrada project.

VI. CONCLUSION

F-65 Our clients urge the City to revise and re-circulate the draft EIR for the proposed Entrada Project. In particular, subsequent environmental review must be conducted, because the evidence shows changes in the circumstances surrounding the proposed project, the necessity for changes in the proposed project, and new information demonstrating significant impacts. The draft EIR should be revised to reflect the plain language of state and local visual resource policies and to analyze the evidence in the record of adverse and significant impacts on existing views.

F-66 The draft EIR's view impact analysis must be revised to accurately describe the existing view baseline upon which to measure impacts. In addition, the methodology must be revised to omit criteria reflecting the existing baseline and to include objective thresholds of significance, which are developed through a public process. Thereafter, the view impact analysis should consistently apply the objective methodology. By applying the objective criteria to the evidence in the record, the draft EIR should conclude that the proposed Entrada project would result in significant adverse impacts on the environment that cannot be feasibility mitigated or avoided (Class I) or significant adverse impacts on the environment that can be feasibly mitigated or avoided (Class II).

F-67 Similarly, the cumulative impact analysis must be revised to consistently analyze whether the impacts of past, present and future probably projects, when considered together, will compound or increase impacts. The analysis must omit irrelevant criteria. By applying CEQA's requirements for cumulative impact analyses to the evidence in the record, the draft EIR should conclude that the proposed Entrada project would result in significant adverse cumulative impacts on the environment that cannot be feasibility mitigated or avoided (Class I) or significant adverse cumulative impacts on the environment that can be feasibly mitigated or avoided (Class II).

F-68 Since the draft EIR's conclusions are unsupported by substantial evidence and reveal a misapplication of CEQA, and substantial evidence of adverse and significant impacts on views is presented in the record, alternatives and mitigation measures must be described and analyzed. As such, the City must revise and re-circulate the draft EIR for public comment.

Thank you for your consideration of these comments.

Sincerely,

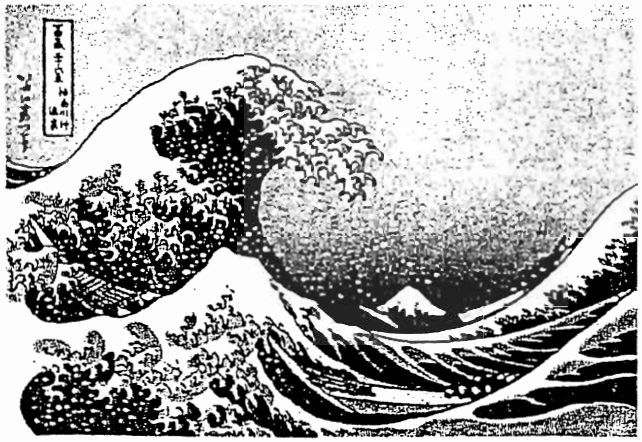
Tanya Gulesserian
Staff Attorney

cc: Catherine McCammon, President, CPA
Beverly King, President, LWVSB

OES CALIFORNIA
Governor's Office of Emergency Services

Local Planning Guidance on Tsunami Response

A Supplement to the Emergency Planning Guidance for Local Governments



Gray Davis
Governor
State of California

Dallas Jones
Director
Governor's Office of Emergency Services

EXHIBIT A

Executive Summary

In 1997, the California Governor's Office of Emergency Services convened a Tsunami Hazard Mitigation Workshop. The workshop was comprised of local, state and federal agencies representing coastal communities and programs. Even though participating local jurisdictions were aware of the tsunami threat, they had done little tsunami specific evacuation, mitigation, preparedness, response or recovery planning. The workshop participants identified a critical need for the development and distribution of up-to-date inundation maps to the communities at risk, as well as the development of guidance on how to use the maps for local government.

In October of 1997, representatives of coastal counties were brought together to identify and prioritize the areas along the California coastline to be mapped during the initial phase of the tsunami mitigation program. With funding from the National Tsunami Hazard Mitigation Program of NOAA, Professor Costas Synolakis of the University of Southern California was selected to produce inundation projections for selected coastal areas. The areas chosen were: 1) San Francisco County and San Mateo County (Golden Gate through San Mateo), 2) Santa Barbara County, 3) San Diego County (Coronado to Encinitas), and 4) Los Angeles County (Santa Monica to Palos Verdes). Projections of tsunami inundation in Humbolt Bay and Crescent City will be provided by the NOAA TIME Center in Newport, Oregon as part of a national assessment of alternative modeling approaches (NOAA published initial inundation maps for Humboldt Bay and Crescent City in 1994).

There is agreement within the tsunami and emergency response communities that technology alone cannot protect coast habitants in the immediate area of a near-source tsunami. When a large subduction zone earthquake occurs nearby, the first tsunami waves may reach coastal communities within a few minutes of the event. Local populations at risk must be able to recognize the signs of impending tsunami hazards and seek higher ground immediately. Communities need to be aware of what areas are likely to be flooded. Local decision-makers need to understand the risk and be provided with mitigation tools in order to make informed planning decisions. Planners, emergency responders, and residents need to understand the multi-hazard ramifications of a very large local earthquake and its disruption to the community.

This planning guidance is intended to assist local governments in the initial development of a tsunami response plan and the procedures necessary to deal with a tsunami's impact on their communities. This guidance covers three main areas:

- Use of Model Inundation Maps
- Development of tsunami specific plans including evacuation procedures
- Explanation of tsunami warning procedures

While this planning guidance is designed for use by local governments, as defined in the Standardized Emergency Management System (SEMS), it may also be used for planning purposes by Operational Areas (OAs). State or federal agencies that support local governments through field offices will also find this a useful planning document.

Introduction

A tsunami (seismic sea wave, tidal wave) is a series of waves most commonly caused by an earthquake beneath the sea floor or by a large undersea landslide. In the open ocean, tsunami waves travel at speeds of up to 600 miles per hour but are too small to be observed. As the waves enter shallow water, they slow down and may rise to several feet or, in rare cases, tens of feet. Tsunamis can cause great loss of life and property damage where they come ashore. The first wave is almost never the largest; successive waves may be spaced tens of minutes apart and continue arriving for many hours. Since 1812, the California coast has had 14 tsunamis with wave heights higher than three feet; six of these were destructive. The Channel Islands were hit by a damaging tsunami in the early 1800s. The worst tsunami resulted from the 1964 Alaskan earthquake and caused 12 deaths and at least $17 million in damage to northern California. The April 25, 1992 Cape Mendocino earthquake produced a one-foot tsunami that reached Humboldt Bay in about 20 minutes after the shaking. Although not damaging, this tsunami demonstrated that a wave could reach our coastline quickly. Two general types of tsunamis could affect the coastal areas of California:

Local-source tsunami: If a large tsunami-genic earthquake occurs at or near the California coast, the first waves may reach coastal communities within minutes after the ground shaking stops. There is no time for authorities to issue a warning. Mitigation requires an understanding of areas at risk, areas of safety, evacuation routes and a trained public that understands the need to immediately move inland or to higher ground.

Though infrequent, California has experienced local tsunamis in the past, and paleotsunami evidence shows major tsunami impact in the recent geologic past. Risk is considered high along the north coast of California, from Crescent City to Cape Mendocino; moderate south of Cape Mendocino to north of Monterey; high south of Monterey to Palos Verdes; and moderate south of Palos Verdes to San Diego (see Historic California Tsunamis in Appendix 2.) Large local tsunamis may impact the entire California coastline. Waves from an earthquake at the Cascadia Subduction Zone could reach southern California in less than 2 hours.

Distant-source tsunami: Very large earthquakes in other areas of the Pacific Rim may also cause tsunamis which could impact California's coast. The first waves would reach our coastline many hours after the earthquake occurred. Tsunami Warning Centers are responsible for alerting local officials, who may order evacuation. Effective mitigation requires an understanding of the tsunami warning system, local areas at risk, and evacuation planning.

REGISTRATION

The Governor's Office of Emergency Services
State and Local Government

Tsunami Mitigation Workshops

March, April, May, 2000 - 9:00 a.m. - 3:00 p.m.
Oakland • Eureka • Santa Barbara • San Diego • Anaheim

Fee: $25.00

Please select a Session:

☐ Monday, March 6, 2000	Oakland	Metro Center
☐ Thursday, March 9, 2000	Eureka	Red Lion Hotel
☐ Tuesday, April 4, 2000	Santa Barbara	Radisson Hotel
☐ Friday, April 21, 2000	Anaheim	Embassy Suites
☐ Monday, May 1, 2000	San Diego	Wyndham Emerald Plaza

Name _____

Title _____

Affiliation _____

Address _____

City _____ State _____ Zip _____

Phone _____ Fax _____ e-mail _____

METHOD OF PAYMENT: ☐ CHECK ENCLOSED ☐ CREDIT CARD

CREDIT CARD NUMBER _____ EXPIRATION DATE _____

PRINT CARDHOLDERS NAME _____

CARDHOLDER'S SIGNATURE _____

Mail registrations to:
ABAG, Inc.
P.O. Box 2050
Oakland, CA 94604-2050

Or Fax completed form to:
510.464.7980

or *register online at*
http://www.abag.ca.gov/bayarea/eqmaps/tsunami/tsunami.html

Should you need overnight accommodations, you may contact the following hotels:

Red Lion Eureka Hotel	707.445.0844
Anaheim Embassy Suites	714.632.1221
Santa Barbara Radisson Hotel	805.963.0744
Wyndham Emerald Plaza, San Diego	619.338.3605

REGISTRATION - A map will be mailed with your confirmation. No refunds or cancellations after one week preceding the workshop date. Call 510.464.7964 or 510.464.7900 for more information.

For online information go to http://www.abag.ca.gov/bayarea/eqmaps/tsunami/tsunami.html

URBAN CROSSROADS

41 Corporate Park
Suite 210
Irvine, CA 92606
p: 949.660.1994
f: 949.660.191

TRANSPORTATION PLANNING
TRAVEL DEMAND MODELING
DATABASE DEVELOPMENT
GIS
TRAFFIC ENGINEERING
ACOUSTICAL STUDIES
PARKING STUDIES
TRAFFIC IMPACT STUDIES

John Kain, AICP
Carleton Waters, P.E.
Carl Ballard
Bill Lawson, AICP
Scott Sato, P.E.

March 12, 2001

Ms. Tanya Gulesserian
Staff Attorney
ENVIRONMENTAL DEFENSE CENTER
906 Garden Street
Santa Barbara, CA 93101

Subject: La Entrada de Santa Barbara Traffic Evaluation

Dear Ms. Gulesserian

The firm of Urban Crossroads, Inc. is pleased to submit the following traffic evaluation of the Entrada De Santa Barbara traffic study prepared by Kaku Associates (August 1998) and other related traffic issues in the adjacent area. It is our understanding that the project consists of a mixture of resort hotel and retail developments adjacent to the intersection of State Street and Mason Street in the City of Santa Barbara. Specifically, this letter report addresses the following issues:

- Future project traffic generation beyond existing conditions
- Impacts of narrowing State Street to two lanes between the project frontage and the railroad tracts and turn restrictions
- Traffic signal warrants/intersection levels of service at the intersection of State Street/Mason Street

Future Trip Generation

The traffic study prepared by Kaku Associates assumed a comparison of the existing on-site uses versus the proposed development. The analysis concluded that the proposed development would generate fewer trips than the existing uses. It should be noted that the traffic study included an assumed reduction of trips (between 35-40%) to account for walk-in, transit trips, and internal use. Urban Crossroads, Inc. staff has reviewed the existing on-site developments and has identified the current square footage for each use. The existing uses identified in the traffic study are different than those identified by Urban Crossroads, Inc. staff. Table 1 summarizes the land use quantities for the existing site and the proposed development by its location.

EXHIBIT B

The trip generation rates used to determine the approximate number of trips are presented in Table 2. These trip rates were based on the Institute of Transportation Engineers, Trip Generation Manual (6th Edition) and the San Diego Traffic Generators (December 1996). The resulting trip generation estimates for the land use quantities indicated in Table 1 are presented on Tables 3 and 4 for the existing and proposed developments, respectively. Table 5 presents a comparison between the existing and proposed project. As indicated in Table 5, the project is anticipated to generate approximately 2,020 additional trips per day with 188 additional trips occurring during the AM peak hour and 126 additional trips occurring during the PM peak hour. These estimates do not include a reduction in vehicle trips for either existing or proposed uses.

The ramifications of this finding would include an increase in the amount of future traffic to the study area intersections. Based on the trip distribution patterns presented in the KAKU traffic study, this would add a minimum of approximately 16 PM trips to the intersection of Garden Street and the SR-101 NB Ramp. Based on the City of Santa Barbara's impact criteria, this would constitute an impact due to adding more than 5 peak hour trips to an intersection that exceeds a 0.77 volume-to-capacity level.

Other Transportation-Related Issues

In addition to the issues discussed above, the following transportation related issues have been qualitatively reviewed by Urban Crossroads, Inc. staff:

- New Pedestrian Crossings
- Additional Parking across from the Site
- Traffic Signal at the intersection of State and Mason and the Possibility of New Stop Lights on Cabrillo Boulevard

New pedestrian crossings on Mason Street will provide pedestrians a designated mid-block crossing to access adjacent uses across Mason Street. Although crosswalks are provided at the intersections with State and Helena streets, a mid-block crossing may eliminate jay walking. Based on the site design, it appears that pedestrians would be required to use a circuitous route to access the crosswalks at the intersections.

The proposed parking areas across from the site will require pedestrians to cross both State and Mason Streets to access the proposed project. Although this could increase vehicular delays due to additional pedestrian activity, it is typical of this type of development in urban areas.

In general, traffic signals should be constructed if warrants are met. The Kaku Associates traffic study assumed that a traffic signal would be constructed at the intersection of State Street and Mason Street but did not include the signal warrant worksheets justifying this assumption. However, in the future, if minimum warrants are met at this intersection or other locations along Cabrillo Boulevard, traffic signals should be implemented.

Conclusions

In reviewing the existing and proposed uses, Urban Crossroads, Inc. has determined that the project will add trips to an intersection identified as exceeding the minimum volume-to-capacity threshold of 0.77 (Garden Street at SR-101 NB Ramp).

The roadway modifications to State Street are expected to cause traffic to be rerouted to adjacent parallel routes. These modifications include narrowing State Street to one through lane in each direction and prohibiting north/south left turns at the intersection of State Street and Mason Street.

If you have any questions please do not hesitate to call us at (949) 660-1994

Sincerely,

URBAN CROSSROADS, INC.

John Kain, AICP
Principal

Scott Sato, P.E.
Senior Engineer

00059-0088-01
JK:SS:pr
Attachments

TABLE 1

COMPARISON OF PROPOSED PROJECT TO EXISTING CONDITIONS

AREA	EXISTING OCCUPIED LAND USE	PROPOSED LAND USE
A (Southwest Quadrant, State/Mason)	None (Hotel/Restaurant Bldg. Unoccupied and closed for Business)	52 rooms/vacation units 5,368 sq. ft. retail
B (Northeast Quadrant, State/Mason)	7,496 sq. ft. warehouse 2,400 sq. ft. bike rental 1,352 sq. ft. restaurant 1,352 sq. ft. retail	60 rooms/vacation units 4,588 sq. ft. retail
C (Southeast Quadrant, State/Mason)	8,555 sq. ft retail[1] 1,335 sq. ft. auto/boat repairs/services 1,000 sq. ft. auto sales/rental 780 sq. ft. warehouse	50 rooms/vacation units 7,576 sq. ft. retail 2,500 sq. ft. visitor info. Center

[1] "5 for 10 T-Shirts" at 6,135 square feet, Paddle Sports at 2,160 square are feet, and wine tasting at 260 square feet.

H:\UcJobs\00059\excel\[00059-0088-02.xls]T 1

TABLE 2

TRIP GENERATION RATES[1]

LAND USE	ITE CODE	QUANTITY	UNITS[2]	PEAK HOUR TRIP RATES				DAILY RATE
				AM		PM		
				IN	OUT	IN	OUT	
Auto Related Sales/Service	843		TSF	1.75	0.75	2.93	3.05	61.91
Resort Hotel	330		RM	0.22	0.9	0.18	0.24	8.23
Restaurant	832		TSF	4.72	4.45	6.52	4.34	130.34
Retail	820	3.752	TSF	3.67	2.35	9.2	9.97	220.07
Retail	820	4.588	TSF	3.38	2.16	8.59	9.31	204.82
Retail	820	5.368	TSF	3.18	2.03	8.15	8.83	193.65
Retail	820	7.576	TSF	2.76	1.77	7.25	7.85	171.24
Retail	820	8.555	TSF	2.63	1.68	6.95	7.53	163.97
Warehouse	150		TSF	0.37	0.08	0.12	0.39	4.96

[1] Source: ITE (Institute of Transportation Engineers) Trip Generation Manual, 6th Edition, 1997.

[2] TSF = Thousand Square Feet
RM = Rooms

H:\UcJobs\00059\excel\[00059-0088-02.xls]T 2

TABLE 3

EXISTING LA ENTRADA TRIP GENERATION SUMMARY

LAND USE	QUANTITY	UNITS1	PEAK HOUR				DAILY
			AM		PM		
			IN	OUT	IN	OUT	
Area A							
Existing Land Use Closed			0	0	0	0	0
Area B							
Retail	3.752	TSF	14	9	35	37	826
Warehouse	7.496	TSF	3	1	1	3	37
Restaurant	1.352	TSF	6	6	9	6	176
Subtotal			23	16	45	46	1,039
Area C							
Retail	8.555	TSF	22	14	59	64	1,403
Warehouse	0.780	TSF	0	0	0	0	4
Auto Related Sales/Service	2.335	TSF	4	2	7	7	145
Subtotal			26	16	66	71	1,552
TOTAL			49	32	111	117	2,591

[1] TSF = Thousand Square Feet
DU = Dwelling Units
STU = Students

[2] Nom = Nominal

H:\UcJobs\00059\excel\[00059-0088-02.xls]T 3

TABLE 4

PROPOSED LA ENTRADA TRIP GENERATION SUMMARY

LAND USE	QUANTITY	UNITS[1]	PEAK HOUR AM IN	PEAK HOUR AM OUT	PEAK HOUR PM IN	PEAK HOUR PM OUT	DAILY
Area A							
Resort Hotel	52	RM	11	47	9	12	428
Retail	5.368	TSF	17	11	44	47	1,040
Subtotal			28	58	53	59	1,468
Area B							
Resort Hotel	60	RM	13	54	11	14	494
Retail	4.588	TSF	16	10	39	43	940
Subtotal			29	64	50	57	1,434
Area C							
Resort Hotel	50	RM	11	45	9	12	412
Retail	7.576	TSF	21	13	55	59	1,297
Subtotal			32	58	64	71	1,709
TOTAL			89	180	167	187	4,611

[1] TSF = Thousand Square Feet
RM = Rooms

H:\UcJobs\00059\excel\[00059-0088-02.xls]T 4

TABLE 5

TRIP GENERATION DIFFERENCE BETWEEN THE PROPOSED PROJECT AND THE EXISTING USES

LAND USE	PEAK HOUR AM IN	PEAK HOUR AM OUT	PEAK HOUR PM IN	PEAK HOUR PM OUT	DAILY
Area A					
Proposed Uses	28	58	53	59	1,468
Existing Uses	0	0	0	0	0
Subtotal	28	58	53	59	1,468
Area B					
Proposed Uses	29	64	50	57	1,434
Existing Uses	23	16	45	46	1,039
Subtotal	6	48	5	11	395
Area C					
Proposed Uses	32	58	64	71	1,709
Existing Uses	26	16	66	71	1,552
Subtotal	6	42	-2	0	157
TOTAL	40	148	56	70	2,020

[1] TSF = Thousand Square Feet
RM = Rooms

H:\UcJobs\00059\excel\[00059-0088-02.xls]T 5

URBAN CROSSROADS, INC.

Transportation Planning/Engineering
Traffic/Parking/Noise Studies
GIS/Database Development

STATEMENT OF QUALIFICATIONS

41 Corporate Park, Suite 210
Irvine, CA 92606
(949) 660-1994
Fax (949) 660-1911

email: admin@urbanxroads.com
www.urbanxroads.com

URBAN CROSSROADS OVERVIEW

Growth in Southern California brings with it the continuing challenges of mobility and congestion, activity and noise, and the need to organize and manage geographic data efficiently. The staff at Urban Crossroads, Inc. have been at the epicenter of these issues, providing a balanced approach to resolving complex urban issues.

Urban Crossroads, Inc., uniquely combines engineering expertise and professionalism with creative thinking and innovative problem solving. The result is an extraordinary transportation planning and engineering firm that possesses the requisite expertise as well as the ability to look across disciplinary boundaries for solutions others may overlook.

This multidisciplinary approach is evident by the breadth of services available to diverse clientele that includes regional governments, counties, cities, special districts, private developers and contractors, engineering and planning firms.

OUR MISSION

To work with clients to ensure transportation systems are used to their full potential with minimal impacts. This is accomplished by applying the lessons of the past and innovative techniques to reduce traffic congestion and accommodate alternative transportation modes through effective community design.

THE COMPLETE RANGE OF TRANSPORTATION ENGINEERING EXPERTISE

Urban Crossroads is a transportation planning and engineering firm offering a broad range of services including:

- Transportation Planning
- Traffic Engineering
- Travel Demand Modeling
- Traffic Impact Studies
- Geographic Information Systems (GIS)
- Circulation Elements
- Transit/Pedestrian Systems
- Parking Studies
- Computer Aided Design

Urban Crossroads also integrates transportation and noise impacts into acoustical engineering services including:

- Acoustical Studies
- Sound Barrier Analysis
- Noise Elements
- Noise Ordinance Compliance

THE RIGHT PERSONNEL FOR THE JOB

Urban Crossroads' staff represent more than a century of cumulative experience in transportation planning and related disciplines.

Beyond this experience, Urban Crossroads personnel are recognized leaders in the fields of transportation modeling, traffic impact analysis, circulation planning, multi-modal planning, parking studies, and acoustical engineering.

QUALITY WORK ATTRACTS QUALITY CLIENTS

Perhaps the best measure of a firm's capabilities is the quality of the clientele served by its staff. Urban Crossroads personnel have performed major assignments for the Southern California Association of Governments, Orange County Transportation Authority, Metropolitan Water District, and the Transportation Corridor Agencies as well as the counties of Orange, Riverside and Imperial.

Our staff have provided professional services for municipalities such as the cities of Huntington Beach, Irvine, Mammoth, Mission Viejo, Moreno Valley, Murrieta, Perris, Rialto, San Bernardino, and San Juan Capistrano. Institutional clientele have included a range of school districts as well as respected institutions like the University of California, Irvine and California Baptist College.

Urban Crossroads' staff have served more than 500 private sector companies ranging from developers and engineers to urban planners.

TRANSPORTATION MODELING

Urban Crossroads staff have developed numerous traffic models to evaluate future travel patterns and capacity requirements. John Kain, AICP, Carleton Waters, P.E., Marlie Whiteman, Bill Lawson and Scott Sato, P.E., have many years of experience with TRANPLAN and other travel demand forecasting software.

Urban Crossroads personnel are experienced in land use and network database management using ESRI GIS software and Microsoft Access software.

Urban Crossroads staff have extensive experience in GIS applications, regional model interface (window/focus techniques), interactive graphics, land use and trip generation assessments, validation procedures, traffic assignment options, and refinement of traffic forecasts. The firm can provide "hands on" training in computer applications for TRANPLAN and many other software packages.

TRAFFIC IMPACT ANALYSIS

Urban Crossroads staff have prepared several hundred traffic impact studies throughout Southern and Central California, as well as Southern Nevada, Arizona and Colorado. Work products provided by the firm includes conceptual planning/feasibility studies or detailed design recommendations. The firm can evaluate both existing conditions and the effects of future development upon infrastructure requirements. Urban Crossroads staff have prepared numerous studies in compliance with Congestion Management Program (CMP) requirements.

Urban Crossroads responsibilities can include representing clients at Board of Supervisors, City Council and Planning/Traffic Commissions meetings; liaison with company/public agency representatives on technical matters involving traffic impacts; working with County, regional and state agencies to secure government approvals and funding for projects; and interfacing with other firms to provide coordination of engineering/planning and design of projects.

CIRCULATION PLANNING

Urban Crossroads has a broad range of experience including city general plan circulation elements, specific plans, traffic control assessments for special attractions or major events, site access evaluations, traffic management plans and fee program studies. Urban Crossroads staff have prepared general plan circulation element updates for the Cities of Beaumont, Hesperia, Indian Wells, Indio, Murrieta, Montclair, Norwalk, Rancho Cucamonga, Rancho Mirage, San Jacinto and the Town of Yucca Valley.

Urban Crossroads staff developed traffic projections in support of Project Study Reports (PSR's) for the Portrero Boulevard/SR-60 Freeway interchange and Washington Street/I-10 Freeway interchange, as well as design volumes in support of the Project Reports for the Monterey Avenue/I-10 Freeway interchange and Cook Street/I-10 Freeway interchange.

Urban Crossroads services include the preparation of neighborhood traffic management plans to reduce volumes on residential streets, minimize vehicle speeds, and address "cut through" traffic issues. Traffic solutions which have been addressed include roundabouts, street closures, speed humps, chokers, and access restrictions.

TRANSPORTATION DEMAND MANAGEMENT

Transportation demand management (TDM) strategies designated for local government action have taken on increased importance in light of federal conformity requirements. Many local governments have adopted trip reduction ordinances to comply with the state and federal mandates. Urban Crossroads staff have prepared TDM plans for industrial, office, retail and residential projects throughout Southern California. Urban Crossroads services include the determination of appropriate transportation control measures as well as project-specific implementation and monitoring strategies.

TRANSIT PLANNING

The increasingly intermodal aspects of regional and local transportation are addressed by Urban Crossroads on an integrated basis. Urban Crossroads staff have prepared detailed studies of on-road and rail transit services, including corridors and stations.

Urban Crossroads staff provided assessments of the location, design and travel patterns associated with commuter rail stations in Orange County, San Bernardino County and Kern County. Accommodations for public transportation services, such as bus turnouts and pedestrian access linkages, have been incorporated into many large and small development projects based upon Urban Crossroads staff inputs.

URBAN CROSSROADS OVERVIEW

Urban Crossroads staff have been involved in the preparation of patronage forecasts for the initial section of the Central Orange County Fixed Guideway System, including the Fullerton Transportation Center.

PARKING STUDIES

Urban Crossroads staff have completed a number of parking studies for residential, commercial and industrial developments. Studies have included evaluating existing parking demand and the assessment of "shared parking" through the use of ULI shared parking evaluation procedures. Parking management plans have been developed to control parking for high parking generators (i.e. large institutional uses and special events including raceways and concerts).

Urban Crossroads develops creative and innovative methods for maximizing the efficiency of available parking resources. Re-evaluating existing parking facility designs to improve circulation, safety, modify control operations and maximization of parking spaces is also a specialty of the company.

ACOUSTICAL ENGINEERING

The effects of traffic on noise and air quality are a significant by-product of roadway design. Urban Crossroads services include acoustical studies, truck mix studies, noise control assessments and noise mitigation design. Urban Crossroads uses "state of the art" computer modeling to project noise impacts and also has the equipment to prepare actual field measurements.

Urban Crossroads staff have written hundreds of noise impact studies and the noise element of the General Plan for several communities in Southern California including; the City of Los Alamitos, the City of La Quinta, the City of Yucca Valley and the City of Montclair.

TRAFFIC ENGINEERING

Urban Crossroads provides a full range of traffic engineering capabilities including traffic signal warrant studies, weaving analysis, parking area design, signing and striping, pedestrian/ bicycle studies, and feasibility studies. Work products provided by the firm can include concept plans, improvement plans, traffic safety/traffic control studies and recommendations with respect to evaluating traffic control devices and other roadway design features.

Traffic design plans are prepared using AutoCAD software to easily interface with other project plans. Urban Crossroads can prepare engineering studies to identify appropriate speed limits based upon radar speed surveys. Field review of existing conditions is an important element of the Urban Crossroads design process.

Urban Crossroads responsibilities can include evaluating existing traffic conditions, including traffic control devices; recommending appropriate speed limits based upon radar speed studies, accident history and existing physical conditions; reviewing the need for traffic control devices; sight distance evaluations, including before and after project implementation; and evaluation of the need for speed humps as an appropriate roadway design feature and other traffic engineering functions.

URBAN CROSSROADS STAFF MEMBERS

- John Kain, AICP
- Carl Ballard
- Carleton Waters, P.E.
- Scott Sato, P.E.
- Bill Lawson, AICP
- Marlie Whiteman, EIT
- Suzanne Flores
- Erik Tanaka
- Natalie McElmeel

URBAN CROSSROADS SENIOR STAFF EXPERIENCE

TRANSPORTATION MODELING

Orange County
- Aliso Viejo Subarea Traffic Model
- Huntington Beach General Plan Update Traffic Model
- Irvine Transportation Analysis Model Update
- Saddleback Area Circulation Study Traffic Model
- Santa Ana River Crossings Cooperative Study Traffic Model
- Santa Margarita Subarea Traffic Model

Riverside County
- Beaumont Area Traffic Model/Analyzer
- Desert Area Traffic Model (Washington Street/I-10 Interchange PSR)
- Desert Hot Springs West Study Area Buildout Traffic Model
- Indio Traffic Model
- Lake Elsinore General Plan Traffic Model
- Lakeview/Nuevo Specific Plan Scenario Traffic Model
- La Quinta Traffic Model
- Menifee Area Traffic Model
- Moreno Valley Traffic Model
- North Murrieta Traffic Model
- Palm Desert Traffic Model
- Ramona Expressway Corridor Traffic Model
- Rancho Mirage Traffic Model
- Southwest District Traffic Model
- Van Buren Corridor Traffic Model

San Bernardino County
- Chino Traffic Model
- Hesperia General Plan Traffic Model
- RSA 33 (Morongo Basin) Transportation Model

Other
- Imperial County Transportation Model (Imperial County)
- Town of Mammoth Lakes Transportation Model (Mono County)
- East Chula Vista Traffic Model (San Diego County)
- Ojai Traffic Model (Ventura County)
- Highlands Ranch Community Traffic Model (Douglas County, Colorado)

TRAFFIC IMPACT ANALYSIS

Kern County
- Cambridge Village Traffic Study
- Castle & Cooke Parcel Map 7394 Traffic Study
- International Trade & Transportation Center Traffic Study
- The Marketplace Traffic Impact Study
- N.O.R.S.D. Property Traffic Study

Los Angeles County
- Bell Gardens Central City Redevelopment Project Area Traffic Study
- Bixby Property (City of Industry) Traffic Study
- Birtcher Industry Redevelopment Project Traffic Study
- Agua Dulce Vesting Tentative Tract No. 50385 Traffic Study
- Kodak Industrial Park Traffic Impact Analysis
- California Buddhism Center Traffic Impact Analysis
- Long Point Specific Plan Traffic Study
- Fairfield Del Amo Apartments Traffic Study
- San Dimas Business Center Traffic Analysis
- Walgreens Traffic and Parking Analysis

Orange County
- Bolsa Chica Traffic Impact Analysis
- Cypress Texaco Gas Station Traffic Study
- Irvine MPC Industries Traffic Study
- McGaw Business Center Traffic Study
- Saddleback Meadows/CMP Traffic Analysis
- University of California, Irvine Group Housing Traffic Study
- University of California, Irvine Parking Structure No. 2 Traffic Study
- Weir Canyon/La Palma Commercial Project Traffic Study
- Cypress Canyon CMP Traffic Analysis
- Harbor Blvd. Warehouse Expansion Traffic Study
- Hillsborough Park Resort Traffic Study
- La Habra Albertsons Shopping Center Traffic Study
- Laguna Hills Community Center Park CMP Traffic Analysis

URBAN CROSSROADS SENIOR STAFF EXPERIENCE

Riverside County
- Alessandro Village Traffic Impact Study
- Black Bench Ranch Traffic Study
- Crestmore Materials Aggregate and Quarrying Facilities Traffic Study
- Elsinore City Center Traffic Study
- Horsethief Canyon Ranch Traffic Impact Study
- MacLeod Commercial Palm Desert Traffic Impact Study
- Murrieta Highlands Traffic Analysis
- Murrieta North County Bank Traffic Impact Study
- Murrieta Springs Mall Traffic Mitigation Study
- Noble Creek Traffic Study
- Ramona Expressway Center Access Study
- Silverhawk Townhomes Traffic Impact Study
- Sun City Palm Springs Tentative Tract Impact Studies
- The Vineyard PM 24031 Traffic Impact Study
- Winchester Road ARCO AM/PM, Traffic Impact Study

San Bernardino County
- California Landings CMP Traffic Impact Analysis
- Fairfield Ranch CMP Traffic Impact Analysis
- Harry S. Truman Middle School Traffic Analysis
- Highland Central Commercial Site - Traffic Study
- Hofer Ranch (Ontario) CMP Traffic Impact Analysis
- Rialto Airport S.P./Mid-Valley Landfill Traffic Study
- Victorville Motorsports Complex Traffic Impact Analysis
- Vintage Avenue/Jurupa Street (Ontario) Traffic Impact Analysis

Other California / Nevada
- Las Vegas Boulevard/Diablo Drive Commercial Traffic Study (Clark County)
- Buffalo Drive/Washington Ave. Commercial Traffic Study (Las Vegas)
- Cheyenne Airpark Traffic Study (North Las Vegas)
- Avenue 9/SR-99 Freeway Commercial Traffic Study (Madera County)

CIRCULATION PLANNING

Kern County
- Pacificana Specific Plan Traffic Study
- Rosedale Ranch Traffic Study
- Seven Oaks Traffic Study
- Brimhall Circulation Amendment Traffic Analysis

Orange County
- Aliso/Wood Canyons Regional Park Traffic Study
- Bolsa Chica Area Traffic Improvement Program
- Foothill Aliso Planned Community Traffic Study
- Foothill Ranch Planned Community Circulation Plan
- Imperial Highway (SR-90) Integrated Transportation Improvements Study
- Irvine Northwood 5 Traffic Study
- Millennium Plan (El Toro Marine Corps Air Station Reuse)
- Saddleback Community Church Traffic Study
- Santa Ana Heights Traffic Analysis
- Westpark (Irvine) Traffic Study

Riverside County
- Alberhill Ranch Specific Plan Traffic Study
- Borel Airpark Center Traffic Study
- Canyon Heights Specific Plan 272 Traffic Study
- City of Lake Elsinore Circulation Element Update
- City of Rancho Mirage General Plan Traffic Analysis
- City of San Jacinto Circulation Element Update
- Eastside Reservoir Recreation Areas Circulation/Access Studies
- Jurupa Community Plan, I-15 West Study Area Traffic Analysis
- Kohl Ranch Specific Plan Traffic Study
- La Laguna Estates Specific Plan Traffic Study
- Lake Edge Specific Plan Traffic Study
- Menifee North Specific Plan 260 Traffic Analysis
- Murrieta Creek Crossings Phasing Analysis
- Olympus Golf Club Specific Plan 287 Traffic Study
- Palm Crest Specific Plan 292 Traffic Study

URBAN CROSSROADS SENIOR STAFF EXPERIENCE

- Perris Downtown Specific Plan Traffic Study
- Quinta Do Lago (SP 284) Traffic Study
- Riverpark Specific Plan Traffic Analysis
- Riverside County Regional Equestrian Center Traffic Study
- Sycamore Creek Specific Plan Traffic Study
- Temecula Old Town Traffic Study
- Washington/I-10 Road and Bridge Benefit Program Traffic Analysis
- Winchester 1800 Traffic Study
- Winchester Hills Specific Plan Traffic Study

San Bernardino County
- City of Yucaipa Road Fee Program Traffic Assessment
- East Highlands Ranch Traffic Study
- Lytle Creek Specific Plan Traffic Study
- Westgate Specific Plan Traffic Study

Other
- City of Norwalk Circulation Element Update (Los Angeles County)
- Mammoth Redevelopment Plan Transportation Analysis (Mono County)
- Edgemont Ranch Traffic Study (La Plata County, Colorado)

TRANSIT / VEHICLE TRIP REDUCTION

Orange County
- El Toro Base Reuse Transit Routes and Terminal Evaluation
- Aliso Viejo Public Transportation Study
- Mission Viejo Multi-Modal Terminal Location Study
- Mission Viejo PA 32 Public Transportation Assessment
- Plano Trabuco Transit Development Plan
- Bolsa Chica Trip Reduction Strategic Plan (Orange County)

Other
- Rancho Cucamonga Transit Concept Plan
- Dial-A-Ride Franchise Performance Study (Los Angeles County)
- Mammoth Multi-Modal Transportation Plan (Mono County)
- Rialto Commuter Rail Station Traffic Analysis (San Bernardino County)
- Public Transit Expenditures/ Funding Assessment (San Diego County)
- Preissman Property Specific Plan 246 TDM Plan (Riverside County)

PARKING STUDIES

- Saddleback Community Church Parking Management Plan (Orange County)
- Bakersfield Convention Center Parking Study (Kern County)

ACOUSTICAL ENGINEERING

Riverside County
- Highland Springs Resort Master Plan
- City of La Quinta Noise Element Technical Report
- Varner Road RV Preliminary Noise Study
- Norte Vista High School Stadium Sycamore Creek Mining Noise Impacts

San Bernardino County
- Summit Heights Specific Plan
- City of Montclair General Plan Noise Element
- Ramona Avenue Grade Martin Ranch

San Diego County
- San Diego Spectrum
- Army and Navy Academy Final Noise Study
- Chapman Heights Preliminary

Los Angeles County
- San Gabriel Valley Gun Club Noise Study
- Laborer's Union Training Facility Noise Study
- Harman "The Center" Final Noise Study

TRAFFIC SAFETY & IMPROVEMENT STUDIES

Orange County
- Bolsa Chica Roundabout Intersection Design
- Saddleback Community Church Access

Riverside County
- Del Webb Palm Springs Bicycle Circulation Plan
- Jefferson Street/I-10 Interchange Concept Design Study
- Ramona Expressway Access Analysis
- Washington Street Realignment Traffic Analysis

Other
- Rialto Gateway/Restaurant Row Access Study (San Bernardino County)
- Rancho Cucamonga Bikeway Master Plan
- Olivenhain Elementary School Traffic Assessment (San Diego County)

PREVIOUS CLIENTS OF URBAN CROSSROADS SENIOR STAFF

BUILDERS/DEVELOPERS

BALDWIN COMPANY, THE
BARRATT AMERICAN, INC.
BEDFORD PROPERTIES
BENNETT PROPERTIES
BRIGHTON HOMES
BROOKSTONE DEVELOPMENT, INC.
BURKE COMMERCIAL DEVELOPMENT
CALIFORNIA OAKS DEVELOPMENT CO.
CASTLE & COOK DEVELOPMENT CORP.
CITATION HOMES
COMMERCIAL CENTER DEVELOPMENT
COSCAN CALIFORNIA, INC.
COUSSOULIS DEVELOPMENT CO.
CROSSROADS DEVELOPMENT
DEL WEBB CALIFORNIA CORP.
DON WILSON DEVELOPMENT
DONAHUE SCHRIBER
EMERALD DEVELOPMENT
FIRST CITY PROPERTIES, INC.
FOCUS DEVELOPMENT
FOOTHILL RANCH COMPANY
HILLMAN PROPERTIES WEST, INC.
HUNTINGTON CAPITAL CORPORATION
INDUSTRIAL COMMERCIAL PROPERTIES
IRVINE COMPANY, THE
JAMES MANLEY AND ASSOCIATES
JOHNSON & JOHNSON DEVEL. CORP.
KAUFMAN AND BROAD
KOLL COMPANY
MARLBOROUGH DEVELOPMENT CORP.
MURDOCK DEVELOPMENT COMPANY
PACIFIC GATEWAY DEVELOPMENT CO.
PACIFIC LANDMARK DEVELOPMENT CO.
PEACOCK RADAKER CORPORATION
PRESLEY OF SOUTHERN CALIFORNIA
PULTE HOME CORPORATION
RANCON FINANCIAL CORPORATION
RANPAC COMMUNITIES
REGIS HOMES
RESCO
ROBERTSON HOMES
SANDERSON - J. RAY DEVELOPMENT
STANDARD PACIFIC OF ORANGE COUNTY
SUDBERRY PROPERTIES, INC.
SUN CAL DEVELOPMENT
SUN PACIFIC
TAYLOR WOODROW HOMES
TMC
VSL ENTERPRISES
WEST MAR COMMERCIAL BROKERAGE
WESTERN NATIONAL PROPERTIES
WOODCREST DEVELOPMENT COMPANY

PLANNERS/ENGINEERS

ADKAN ENGINEERS
ALBERT A. WEBB ASSOCIATES
ARCHITECTS ORANGE
ASSOCIATED ENGINEERS, INC.
BRAMALEA CALIFORNIA, INC.
CHAMBERS GROUP, INC.
CHURCH ENGINEERING, INC.
CM ENGINEERING ASSOCIATES, INC.
COURTON & ASSOCIATES
CROSBY AND ASSOCIATES
CULBERTSON, ADAMS & ASSOC., INC.
CYP, INC.
DAVID TAUSSIG AND ASSOC., INC.
EIP ASSOCIATES
ENVIRONMENTAL PERSPECTIVES
FLORIAN MARTINEZ ASSOCIATES
HDR ENGINEERING, INC.
HRP LAND DESIGN
HUNSAKER AND ASSOCIATES
IMPACT SCIENCES
J. L. WEBB PLANNING
KEITH COMPANY, THE
LIGHTFOOT PLANNING GROUP, THE
LOHR AND ASSOCIATES, INC.
LPA, INC.
L.D. KING, INC.
MARKHAM & ASSOCIATES
MICHAEL BRANDMAN ASSOCIATES
NBS/LOWRY
PBR
PLANNING AND DESIGN SOLUTIONS
PLANNING ASSOCIATES, THE
PLANNING CENTER, THE
PLANNING CONSORTIUM, THE
PLANNING NETWORK
PROJECT DESIGN CONSULTANTS
PSOMAS AND ASSOCIATES
RANPAC ENGINEERING CORPORATION
ROBERT BEIN, WILLIAM FROST
SOUTHLAND ENGINEERING
T & B PLANNING
TERRA NOVA
TRANS-PACIFIC CONSULTANTS
URBAN DESIGN STUDIO
URBAN VISION

PREVIOUS CLIENTS OF URBAN CROSSROADS SENIOR STAFF

PUBLIC AGENCIES/INSTITUTIONS
CITY OF BEAUMONT
CITY OF BUENA PARK
CITY OF CHINO
CITY OF CLAREMONT
CITY OF CYPRESS
CITY OF HESPERIA
CITY OF HUNTINGTON BEACH
CITY OF INDIAN WELLS
CITY OF INDIO
CITY OF IRVINE
CITY OF LAKE ELSINORE
CITY OF LA QUINTA
CITY OF MORENO VALLEY
CITY OF MURRIETA
CITY OF PALM DESERT
CITY OF PERRIS
CITY OF MONTCLAIR
CITY OF NORWALK
CITY OF RANCHO CUCAMONGA
CITY OF RANCHO MIRAGE
CITY OF RIVERSIDE
CITY OF SAN JACINTO
CITY OF TEMECULA
CITY OF YUCAIPA
TOWN OF YUCCA VALLEY
COUNTY OF IMPERIAL
COUNTY OF ORANGE
EASTERN MUNICIPAL WATER DISTRICT
METROPOLITAN WATER DISTRICT (MWD)
MURRIETA VALLEY SCHOOL DISTRICT
ORANGE COUNTY TRANSPORTATION AUTHORITY
RIVERSIDE CO. ECONOMIC DEV. CORP.
RIVERSIDE CO. TRANSPORTATION DEPT.
SADDLEBACK COMMUNITY CHURCH
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
TOWN OF MAMMOTH LAKES
UNIVERSITY OF CALIFORNIA, IRVINE
WESTERN RIVERSIDE COUNCIL OF GOVERNMENTS

OTHER
CHEVRON U.S.A., INC.
NORTH COUNTY BANK
RALPHS GROCERY COMPANY
SHELL OIL COMPANY
SMART & FINAL

URBAN CROSSROADS, INC. SENIOR STAFF REFERENCES

CITY OF IRVINE
One Civic Center Plaza
Irvine, CA 92713
(949) 724-6456
Marty Bryant (949) 724-7340
Peter Hersh (949) 724-6456

CITY OF CHINO
13220 Central Avenue
Chino, CA 91710
(909) 627-7577
Brent Arnold

CITY OF HEMET
450 E. Latham Avenue
Hemet, CA 92543
(909) 765-3712
Juan Perez

CITY OF HUNTINGTON BEACH
2000 Main Street
Huntington Beach, CA 92648
(714) 536-5523
Tom Brohard

CITY OF RANCHO CUCAMONGA
P.O. Box 807
9320 Baseline Road
Rancho Cucamonga, CA 91730
(909) 477-2740
Jon Gillespie

CITY OF BEAUMONT
550 E. Sixth Street
Beaumont, CA 92223
(909) 769-8520
Ernest Egger

COUNTY OF RIVERSIDE TRANS. DEPT.
4080 Lemon Street, 2nd Floor
Riverside, CA 92507
(909) 955-6767
Ed Studor

SOUTHERN CALIF. ASSOC. OF GOVTS.
3600 Lime Street, Suite 216
Riverside, CA 92501
(909) 784-1513
Mike Ainsworth

UNIVERSITY OF CALIFORNIA, IRVINE
Office of Campus & Environ. Planning
3500 Berkeley Place
Irvine, CA 92697
(949) 856-7058
Richard Demerjian

CITY OF TEMECULA
43200 Business Park Drive
Temecula, CA 92590
(909) 694-6411
Ali Moghadam

CITY OF YORBA LINDA
4845 Casa Loma Avenue
Yorba Linda, CA 92686
(714) 961-7170
Fernando Saldivar

COUNTY OF ORANGE
300 N. Flower Street, 7th Floor
Santa Ana, CA 92702
Harry Persaud-(714) 834-3669

CITY OF MURRIETA
26442 Beckman Court
Murrieta, CA 92562
Jim Miller - (909) 698-1040

CITY OF FONTANA
8353 Sierra Avenue
Fontana, CA 92335
(909) 350-7629
Paul Balbach

TOWN OF MAMMOTH LAKES
P.O. Box 1609
Mammoth Lakes, Ca 93546
(760) 934-8983
Karen Johnston (Planning)
Craig Tackabery
(Engineering)

TOWN OF YUCCA VALLEY
57090 29 Palms Highway
Yucca Valley, CA 92284
(760) 369-6575
Shane Stueckle

SAN BERNARDINO
ASSOCIATED GOVERNMENTS (SANBAG)
472 N. Arrowhead Avenue
San Bernardino, CA 92401
(909) 884-8276
Kim Shultz
Robert Wirts

EXHIBIT A

BILLING RATES FOR URBAN CROSSROADS, INC.

Compensation for Services

The Consultants Billing rates for services are as follows:

Position	Hourly Rate
Senior Principal	$135.00
Principal	$120.00
Senior Associate	$ 95.00
Associate	$ 85.00
Senior Engineer/Planner	$ 75.00
Engineer/Planner/Senior Designer	$ 65.00
Assistant Engineer/Planner	$ 55.00
Senior Technician	$ 50.00
Engineering Technician II	$ 40.00
Engineering Technician I	$ 35.00
Engineering Aide	$ 30.00
Administrative Assistant	$ 40.00
Administrative Aide	$ 35.00
Clerical Aide	$ 30.00

General

(1) Reimbursable direct costs, such as reproduction, supplies, messenger service, long-distance telephone calls, travel and traffic counts will be billed at cost plus ten (10) percent.

(2) Hourly rates apply to work time, travel time and time spent at public hearings and meetings. For overtime work, the above rates may be increased 50 percent.

(3) Client payment for professional services is not contingent upon the client receiving payment from other parties.

(4) Billing statements for work will be submitted monthly. Statements are payable within thirty (30) days of the receipt by client of statement. Any statement unpaid after thirty (30) days shall be subject to interest at the maximum permitted by law.

November 15, 2000

John Kain, AICP
Principal

AREAS OF EXPERTISE

- Transportation Planning and Problem Solving
- Cooperative Study Management
- Traffic Impact Analyses
- Circulation Systems for Planned Communities
- Travel Demand Modeling
- General Plan Circulation Elements
- Neighborhood Traffic Control
- Parking Studies
- Public Outreach

EDUCATION

University of California, Irvine: M.S., Transportation Systems Management, 1977

University of California, Irvine: B.A., Social Ecology, 1975

University of California, Irvine: Certificate in Management of Transportation Programs, 1981

California Community Colleges, Instructor Credential, Public Services/Admin. 1981

REPRESENTATIVE EXPERIENCE

John Kain, AICP has worked professionally in transportation planning and traffic engineering since 1975. He received the master of science degree in administration from the University of California, Irvine, where he specialized in transportation systems evaluation. Mr. Kain has served on the Institute of Transportation Engineers technical committees for Traffic Forecasting and Highway Access Control.

His work on circulation plans and transportation studies for planned communities has included Mission Viejo, Aliso Viejo, Foothill Ranch, Bolsa Chica, and the Irvine Village of Westpark in Orange County; Sun City Palm Desert, Victoria Grove, Winchester Hills, and the Vineyard in Riverside County; South Poway and EastLake in San Diego County; Westgate and East Highlands Ranch in San Bernardino County; Rosedale Ranch and Pacificana in Kern County; Oxnard Town Center and Ormond Beach in Ventura County; Highlands Ranch and Edgemont Ranch in Colorado.

He also prepared the general plan circulation elements for fourteen cities in California, including Beaumont, Hesperia, Indian Wells, Indio, Montclair, Murrieta, Norwalk, Rancho Mirage, San Jacinto, and Solana Beach.

Mr. Kain has managed the development and application of traffic models and Geographic Information Systems (GIS) databases for over twenty areas in California, including Irvine, Huntington Beach, Southeast Orange County, Chino, San Bernardino County RSA 33, Menifee, Moreno Valley, Southwest Riverside County, Palm Desert, Ojai, Mammoth, and Imperial County.

Mr. Kain's experience with transportation studies for unique land uses includes the Long Point resort in Rancho Palos Verdes, Aliso/Wood Canyons Regional Park, MWD Eastside Reservoir Recreation Areas, Sharp Murrieta Healthcare Center, McDonnell Douglas Long Beach Facilities Expansion, the Kern County Foreign Trade Zone, and Saddleback Community Church.

Examples of his work on transit oriented community designs include the Millennium Plan (El Toro Base Reuse) and San Juan Capistrano Metrolink Station Area.

John Kain, AICP
Principal

PROFESSIONAL HISTORY

Urban Crossroads, Inc.
Principal, 2000 –

RKJK & Associates, Inc.,
Principal, 1990-2000

Kunzman Associates,
Principal, 1983-1990

Jack G. Raub Company,
Manager of Transportation and Traffic Engineering,
1980-1983

Jack G. Raub Company,
Transportation Planner,
1978-1980

Institute of Transportation Studies, Research Associate,
1976 & 1977

AFFILIATIONS

American Planning Association (APA)

Institute of Transportation Engineers (ITE)

Transportation Research Board (TRB)

American Society of Civil Engineers (ASCE)

Urban Land Institute (ULI)

AWARDS

Orange County APA,
Comprehensive Planning Award – Millennium Plan (1999)

CCAPA Merit Award, Large Jurisdiction Plan (1999)

Mr. Kain has managed the preparation of parking studies for the Temecula Old Town, Bakersfield Convention Center, Perris Downtown, and UCI Bren Center.

His work on commercial areas has included the Foothill Ranch Towne Centre, Murrieta Springs Mall (RogersDale), Carlsbad Albertsons Center, Rancho Mirage SR-111 Corridor, and the Desert Cities Auto Mall. His experience with office and industrial areas includes the Irvine Business Complex (IBC), Rialto Airport Specific Plan, Victorville Southdown Industrial Park, Borel Airpark Center, and Cheyenne Airpark (Nevada).

Mr. Kain's involvement with neighborhood traffic control includes the Bolsa Chica roundabout design, Mesa West Neighborhood Traffic Management Plan, and numerous residential street impact assessments.

Mr. Kain's experience with educational facilities includes the UCI Long Range Development Plan, CSUSB Palm Desert campus, and California Baptist College.

His work on freeway interchange ramp configurations and concept plans includes Washington Street at the I-10 Freeway, Jefferson Avenue at the I-10 Freeway, Trabuco Road at the SR-133 Tollway and Portrero Boulevard at the SR-60 Freeway.

Cooperative transportation studies managed by Mr. Kain have included the Ramona Expressway, State Route 79, and Van Buren corridors in Riverside County, the Imperial Highway corridor in Yorba Linda, planned Orange County Santa Ana River Crossings between I-405 and Pacific Coast Highway in Orange County, and assessments of the Aliso Creek Road and Ridge Route Drive extensions in Orange County.

Mr. Kain co-founded the firms of Transware Systems in 1982 and RKJK & Associates, Inc. in 1990. His professional activities have included presentations for ITE meetings, model user group workshops, UCI courses, APA programs, and APA newsletter articles. He is an effective communicator and pubic speaker, and has coordinated many public outreach efforts related to transportation issues.

Carleton Waters, P.E.
Senior Associate

AREAS OF EXPERTISE

- Travel Demand Modeling & GIS Integration
- Corridor and Areawide Studies
- Traffic Impact Analyses
- General Plan Circulation Elements
- Site Access and Shared Parking Studies
- Traffic Control Plans

EDUCATION

University of California,
Irvine: B.S., Civil Engineering,1981

University of California,
Irvine: M.S., 1986

PROFESSIONAL HISTORY

Urban Crossroads, Inc.
Senior Associate, 2000-

RKJK & Associates, Inc.,
Senior Associate, 1992-2000

DKS Associates,
Senior Transportation Planner, 1989-1992

HMM Associates,
Transportation Planner,
1987-1989

Louis Berger & Associates,
Assistant Transportation Engineer, 1986-1987

REPRESENTATIVE EXPERIENCE

Carleton Waters, P.E. has worked professionally in transportation engineering since 1981. He received his master of science degree in civil engineering from the University of California, Irvine, where he specialized in transportation and urban systems planning. Mr. Waters has served on the board of the Southwest Region Transportation Model User Group (SWRTMUG).

Mr. Waters primary emphasis in recent years has been the development and application of travel demand models encompassing citywide and larger areas. Models developed and/or applied by Mr. Waters in Orange County, California include the Irvine Transportation Analysis Model (ITAM), the Santa Ana River Area (SARA) Model, and the South Orange County Traffic Model, version 2.7 (SOCTM 2.7).

Mr. Waters has been responsible for developing/applying the Ramona Expressway Corridor Study (RECS) model, the City of Moreno Valley Traffic Model (MVTM), and the Beaumont Area Traffic Model/Analyzer (BATMAN) in the County of Riverside. In San Bernardino County, his model development efforts have included the Chino Traffic Model (CTM) and the Regional Statistical Area 33 (RSA 33) Model, encompassing the Morongo Basin area.

Mr. Waters also played a key role in updating the model structure which is being used to analyze subregional transportation issues in the urbanized portions of Riverside and San Bernardino Counties.

Mr. Waters has also been responsible for developing/ applying a number of travel demand models designed to evaluate the unique travel characteristics of a number of less urbanized areas. Recreational areas for which Mr. Waters has developed travel demand models include the Mammoth Transportation Model (Town of Mammoth Lakes, California), the Conway, New Hampshire travel demand model, and the Palm Desert Traffic Model.

Mr. Waters is regularly involved in major traffic impact studies and various other types of traffic engineering studies and analyses. He has also performed analysis related to the transport of hazardous materials, and the impacts of alternative modes of transport, including light and heavy rail transportation.

Carleton Waters, P.E.
Senior Associate

PROFESSIONAL HISTORY (Cont'd)

Orange County Transportation Commission, Transportation Planning Intern, 1984-1985

Institute of Transportation Studies (ITS), Research Associate, 1983-1986

CME Corporation, Construction costs, quantities and scheduling estimates, 1981-1983

AFFILIATIONS

Institute of Transportation Engineers (ITE)

American Planning Association (APA)

PROFESSIONAL REGISTRATION

Registered Civil Engineer, California #52916

Mr. Waters led the effort to develop a traffic model for Imperial County, California (the Imperial County Traffic Model or ICTM), whose unique aspects include agricultural truck traffic, cross border international truck and passenger vehicle traffic (interactions with Mexico) and the incorporation of a heavy duty truck model component. Many of these efforts required integrating data from Geographic Information Systems (GIS) and travel demand surveys conducted specifically to support model development efforts.

Mr. Waters has been involved in numerous traffic impact studies during his career, including many different residential, commercial, and employment oriented studies. Types of analyses completed by Mr. Waters include off-site traffic impacts, site access features, queuing requirements, parking needs, construction management and traffic diversions.

Engineering design experience is also part of Mr. Waters' work history. Relevant experience includes preparing intersection improvement and signalization plans, coordinated traffic signal timing plans, construction detour plans, and construction quantity and cost estimates.

Carl Ballard
Senior Associate

AREAS OF EXPERTISE

- Traffic Impact Analyses
- Parking Demand Shared Parking Studies
- Transportation Planning
- General Plan Circulation Elements

EDUCATION

California State University, Fullerton: B.A., Mathematics, with emphasis in Probability and Statistics, 1986

University of California Institute of Transportation Studies: Certificate, Fundamentals of Traffic Engineering, 1984

Institute of Transportation Engineers Professional Development Seminar: Certificate, Site Impact Traffic Evaluation, 1987

California State University, Fullerton, University Extended Education Services: Certificate, Transportation Demand Management, 1992

PROFESSIONAL HISTORY

Urban Crossroads, Inc. Senior Associate, 2000-

RKJK & Associates, Inc., Senior Associate, 1990-2000

Kunzman Associates, Associate Engineer, 1986-1990

REPRESENTATIVE EXPERIENCE

Carl Ballard has worked professionally in transportation planning and traffic engineering since 1986 and has completed numerous traffic impact studies in California, Nevada and Colorado. He has extensive experience in the management of complex analytical procedures and computer applications. Mr. Ballard is involved in many aspects of the profession, including: site access evaluation, intersection capacity analysis, traffic forecasting, circulation planning, traffic impact studies, and transportation demand management plans.

Transportation projects completed by Mr. Ballard range from focussed site specific traffic studies to areawide circulation studies. He has written traffic studies within Orange, Los Angeles, Riverside, San Bernardino, Ventura and Kern Counties. Mr. Ballard has managed and performed the technical efforts for General Plan Circulation Elements, Redevelopment Plans, Specific Plans and Environmental Impact Reports for public and private clients.

The variety of Mr. Ballard's work experience in transportation planning includes the completion of traffic studies for the following projects:

- Bolsa Chica in Orange County
- Victorville Motorsports Entertainment Complex in San Bernardino County
- Rialto Airport Specific Plan
- Before and After Studies for opening of the San Joaquin Hills Transportation Corridor
- Imperial Highway (SR-90) Widening Project
- Bakersfield Amtrak Rail Station
- Mission Viejo Mall Expansion
- Expansion of the California State University San Bernardino (CSUSB) campus in Palm Desert
- Badlands Landfill in Riverside County
- Laguna Hills Community Center Park

Carl Ballard
Senior Associate

Kunzman Associates, Engineer Technician, 1982-1986

AFFILIATIONS

American Planning Association (APA)

Institute of Transportation Engineers (ITE)

Association of Environmental Professionals (AEP)

AFFILIATION POSITIONS

American Planning Association (APA), Membership Director, 1996

American Planning Association (APA), Membership Director, 1997

Association of Environmental Professionals (AEP), Secretary, 1998

American Planning Association (APA), Awards Committee Co-Chairperson, 1998

Mr. Ballard has direct experience as contract staff for the City of Irvine. This involved reviewing numerous traffic studies and submitting written comments, attending monthly staff meetings, conducting "hands-on" workshops with residents, and answering questions within Planning Commission and City Council hearings.

Mr. Ballard has experience in a wide range of tasks including the initial interaction with potential clients, preparation of proposals, completion of technical analysis and writing of reports, responding to verbal and written comments for work performed and attendance at public hearings. Mr. Ballard co-founded the firm of RKJK & Associates, Inc. in 1990.

Bill Lawson, AICP
Senior Planner

AREAS OF EXPERTISE

- Noise Impact Modeling and Analysis
- Traffic Impact Analysis
- Transportation Planning
- Geographic Information Systems (GIS)
- Database Development

EDUCATION

California State Polytechnic University, San Luis Obispo: M.S., Civil and Environmental Engineering, 1993

California State Polytechnic University, San Luis Obispo: B.S., City and Regional Planning, 1992

PROFESSIONAL HISTORY

Urban Crossroads, Inc. Senior Planner, 2000-

RKJK & Associates, Inc., Senior Planner, 1996-2000

RKJK & Associates, Inc., Planner, 1993-1996

AFFILIATIONS

American Institute of Certified Planners (AICP)

American Planning Association (APA)

Acoustical Society of America (ASA)

REPRESENTATIVE EXPERIENCE

Bill Lawson, AICP has experience in a variety of transportation-related fields, including circulation planning, transportation modeling, parking demand analysis and traffic impact analysis. In addition to his experience in transportation planning, Mr. Lawson has an extensive background in noise impact analysis and mitigation, Geographic Information Systems (GIS) and in the development of meaningful database solutions.

His work in transportation includes technical support for the Beaumont Traffic Model, the Mammoth Transportation Model, the Chino Traffic Model, the Morongo Basin Transportation Model and the Irvine Transportation Analysis Model. He has worked effectively with local and regional government agencies as well as the development industry.

Mr. Lawson has examined a wide variety of community noise impacts ranging from drive-thru speakerphones to vehicle traffic to roller hockey aircraft overflights. He has prepared hundreds of community noise studies such as the San Gabriel Valley Gun Club Noise Impact Assessment and the SR-79 Sound32 noise barrier analysis. He has written the noise element of the General Plan for several communities in Southern California including; the City of Los Alamitos, the City of La Quinta, the City of Yucca Valley and the City of Montclair.

As a certified ESRI ArcCAD instructor, he has applied his knowledge in GIS and database development to teach and create meaningful solutions to complex planning and engineering issues. Mr. Lawson recently completed the development of the Land Use Tracking Database for the City of Irvine. Throughout this work effort, he effectively worked with three separate City Departments to implement a user-friendly database and simplify the maintenance and retrieval of parcel information over time by City staff. Mr. Lawson has developed over twenty complete databases using Microsoft Access including, a land use databases for RSA 33, project management databases and outstanding conditions / mitigation monitoring databases for the City of Irvine.

Mr. Lawson was a member of the Rancho Santa Margarita Cityhood Committee and he successfully campaigned as chairman of the Political Action Committee for the election of five council members and the passage of Cityhood.

Scott Sato, P.E.
Senior Engineer

AREAS OF EXPERTISE

- Transportation Planning and Engineering
- Traffic Impact Analysis
- Travel Demand Modeling
- On-Call Consulting Services for Public Agencies
- Signal Timing & Progression Analysis
- Parking Studies
- Traffic Signal Design

EDUCATION

University of California, Irvine: B.S., Civil Engineering, 1990

PROFESSIONAL HISTORY

Urban Crossroads, Inc. Senior Engineer, 2000-

RKJK & Associates, Inc., Senior Engineer, 1994 –2000

DKS Associates, Transportation Engineer, 1990 – 1994

Linscott, Law, and Greenspan, Engineering Intern, 1989 – 1990

AFFILIATIONS

Institute of Transportation Engineers (ITE)

Southwestern Region TRANPLAN Model Users' Group

REPRESENTATIVE EXPERIENCE

Scott Sato, P.E., has been working in the field of transportation planning and engineering since 1989. He received his Bachelor of Science degree (Engineering) from the University of California, Irvine in 1990, specializing in transportation studies.

Mr. Sato has worked throughout northern and southern California and Nevada on General and Specific Plan updates, transit modeling, traffic forecasting and circulation plans. His work has included the Douglas County, Sacramento County, and the City of Davis Model Updates. Mr. Sato has also developed travel demand models in southern California for the community of Aliso Viejo, Eastvale, and the cities of Palm Desert and La Quinta.

Mr. Sato has assisted the Los Angeles Metropolitan Transportation Agency (MTA) in preparing transit network alternatives with rail, bus, and HOV components.

Mr. Sato has been active in preparing and updating the traffic impact fee systems for the Cities of Seal Beach and Roseville.

Mr. Sato has designed traffic signals in the Cities of Mission Viejo, Aliso Viejo, and Hawaiian Gardens. Along with his experience in signal design, he has also prepared traffic signal timing and progression studies in the Cities of Santa Ana and Mission Viejo.

Mr. Sato was active in reviewing development applications at the City of Irvine as an on-call consultant. His duties included reviewing all traffic and access studies, discretionary cases, and code compliance applications. He was also responsible for attending commission meetings on behalf of city staff.

July 27, 2000

Planning Commission
City of Santa Barbara
630 Garden Street
Santa Barbara, CA 93101
Facsimile (805) 897-1904

Re: Entrada de Santa Barbara and Lower State Street Improvements – Scoping Comments for Draft Environmental Impact Report

Dear Honorable Commissioners and Planning Staff,

This letter is submitted by the Environmental Defense Center (EDC), on behalf of the Citizens Planning Association of Santa Barbara County, Inc. (CPA) and the League of Women Voters of Santa Barbara (LWVSB), regarding the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the above-referenced Entrada project. The purpose of this letter is to provide scoping comments on new information regarding Mission Creek.

I. NEW INFORMATION REGARDING PROJECT'S IMPACTS ON LOWER MISSION CREEK LAGOON

Significant new information exists regarding the proposed project's impacts to the biological, aesthetic and water resources of Lower Mission Creek. As a result of this new information, based on evidence submitted with this letter, the proposed project may result in significant impacts to biological resources, as described below. Specifically, the City is now aware of, and is the co-sponsor of a major flood control project on the creek adjacent to the project site. The Lower Mission Creek Flood Control Project, as proposed by the City, will approximately double the width of the creek to 60 feet, widening it only on one side – the side adjacent to the Entrada project – by relocating the creek bank about 30 feet towards the project. (Exhibit 1, Lower Mission Creek Flood Control Feasibility Study and Draft EIR/EIS, Plan Sheet No. 16)

Specifically, the City has now publicly presented new information: the exact dimensions of the Lower Mission Creek Flood Control Project locally preferred alternative, Alternative 12, as described in the Draft EIR/EIS released in December of 1999. Consideration of this new information raises new, potentially significant environmental consequences along the project's shared boundary with the ecologically and aesthetically significant lagoon. This alternative as proposed by the City has the

906 Garden Street
Santa Barbara, CA 93101
Phone (805) 963-1622
FAX (805) 962-3152

2021 Sperry Avenue, Suite 18
Ventura, CA 93003
Phone (805) 677-2570
FAX (805) 677-2577

864 Osos Street, Suite A
San Luis Obispo, CA 93401
Phone (805) 781-9932
FAX (805) 781-9384

EXHIBIT C

effect of significantly reducing the riparian buffer between the proposed project and the creek. Instead of having a setback 30 feet or greater from the top of Mission Creek, the project, including a proposed entry and exit way for the parking lot, will now have virtually no setback along portions of the creek frontage. The potentially significant water resources, aesthetic and biological impacts associated with inadequate riparian buffers are discussed below. These are impacts that the project itself will cause, and have are only now ripe to raise in this EIR since the preferred Mission Creek Flood Control Project was not known prior to the release of the previous ND for this project. Therefore, based on this new information and evidence submitted, the EIR must address the impacts resulting from failure to provide an adequate riparian buffer.

It should be noted that the impacts of the project on natural resources when considered in light of the flood control project were not formally analyzed in any previous environmental document. In response to public comment regarding the previous environmental document for this project, the City stated that the flood control project was "speculative," and that considering the cumulative effects of the flood control project and the subject project was therefore inappropriate.

CPA and LWVSB recognize that the City has long proposed a flood control project along Lower Mission Creek, and that the various iterations of that project design all have included widening the creek toward the subject property. However, since the time that the previous environmental document for the subject project was released, new information released by the City illustrates that there will be an inadequate riparian buffer to mitigate the potentially significant impacts of the proposed project. Without addressing these potentially significant impacts, the draft EIR would be legally flawed. Thus, the scope of the EIR must include water and biological resources and feasible mitigation measures and a reasonable array of practical alternatives that avoid or substantially lessen the potentially significant biological resources impacts as a result of the Entrada project and cumulative impacts.

II. BIOLOGICAL IMPACTS

A. Impacts to Steelhead

1. Value of Mission Creek Lagoon as habitat for steelhead

According to Dr. Robert Vadas, Jr., a National Marine Fisheries Service biologist specializing in estuary processes and fisheries, in southern California, lagoons and estuaries are critical to the survival of steelhead. In a letter to Brian Trautwein of the EDC, Dr. Vadas explains how essential lagoons, like the Mission Creek Lagoon, are to steelhead. (Exhibit 2) The Mission Creek Lagoon at the project site is a very important habitat for steelhead that have not yet entered the ocean, and therefore any impacts to this portion of Mission Creek are impacts to a critical habitat of an endangered species.

The importance of lagoons as steelhead habitat is also specified in the California Department of Fish and Game's Steelhead Restoration and Management Plan for California. (Exhibit 3) It states that it is now the policy of the Department of Fish and game to "seek to protect and restore estuarine and lagoon habitats," because, "estuaries and lagoons provide important juvenile rearing habitat, especially in small coastal stream systems," like Mission Creek.

B. Importance of Maintaining Buffers around Creeks and Lagoons to Protect Steelhead

1. Steelhead 4(d) Rule

Under the federal Endangered Species Act, the Secretary of Commerce is required to adopt regulations necessary for the conservation of species listed as Threatened. The proposed 4(d) Rule for Threatened steelhead issued by the National Marine Fisheries Service on December 30, 1999 includes actions that generally are considered to result in a take of steelhead, but which can be exempted from the definition of take if certain conditions are implemented. (Exhibit 4) As an example, one such category of actions is "New Urban Density Development." To fall outside of take prohibitions and thus be permitted, new urban density developments must meet a suite of conditions, including retention of adequate riparian (streamside) buffers to protect water bodies and steelhead habitat from the adverse impacts of dense urban development. The example utilized in the 4(d) rule states, "the development set-back should be equivalent to greater than one site potential tree height (approximately 200 ft (60 m) from the outer edge of the channel migration zone on either side of all perennial and intermittent streams, in order to protect ... rearing habitat." This indicates that the proposed buffer for Mission Creek at the project site is grossly inadequate.

C. Red-legged Frog Recovery Plan

The lack of adequate buffers has been linked to the decline of aquatic and amphibious species and to a host of other environmental problems referred to in this letter that must be addressed in the EIR. Another source of information on this topic is the draft Recovery Plan for the Red-legged Frog. (Exhibit 5) While the frog has not been recorded in Lower Mission Creek in recent years, the recommendations for protecting Red-legged Frog habitat in the Recovery Plan are applicable to all stream and lagoon habitats as well.

The very first recommended recovery action on page 93 of the Plan is "Protect suitable habitats and buffers in perpetuity." (Emphasis added) Within this recommendation, the Plan specifically suggests "Establish appropriate buffers within urban and agricultural areas on a site by site basis." In the discussion, the Plan states that "buffers should be

established and preserved through the same mechanisms used to secure habitat." These recommendations reflect the understanding that the failure to provide adequate buffers around Red-legged Frog habitats has initiated and or accelerated the decline of this species. The same concept holds true for all streams and lagoons and species that inhabit them. Therefore the Draft EIR must assess potentially significant impacts from the lack of a creek buffer that this project, when viewed in combination with the flood control project, will cause.

D. California Coastal Commission Guidance Document for Wetland Projects

1. Defining an Adequate Buffer

According to the California Coastal Commission's June 15, 1994 Procedural Guidance Document for the Review of Wetland Projects, "Buffers around wetlands should be a minimum of 100 feet." (Exhibit 6) Larger buffer areas should be considered since "nearby development poses increased hazards to a wetland or wetland species." In Southern California, the Commission has typically required 100 foot setbacks for fresh- and salt-water wetlands, and 50 foot buffers for riparian areas," according to the Guidance Document. The mouth of Mission Creek is both a riparian area and a wetland, and the concept of maintaining or increasing setbacks to reduce impacts to wetland habitats and the species they support is applicable to the proposed project.

E. Santa Barbara County Local Coastal Plan and General Plan Policies

1. General Plan Conservation Element

Further evidence of the adverse environmental impacts that result from development without adequate riparian buffers can be found in the Santa Barbara County Conservation Element, part of the County's General Plan. (Exhibit 7) This document states that, preservation of strips of riparian land ... can serve to insulate the stream habitats from many of the insults of human activities. The vegetation, particularly its' root systems and associated humus, can serve as a sponge to absorb runoff coming from developed lands. ... Buffer strips will catch much of the silt carried by the runoff, and catch and bind ... nutrients, such as phosphorous, that otherwise will contribute to excessive" pollution of the creek. "Soils of the strip," according to the County's Conservation Element, "bind certain categories of pesticides which enter in runoff from developed lands." Obviously, the wider the strip the greater the degree of protection afforded. ... We estimate that as little as 100 feet on either side of a stream could provide a good deal of protection to the stream." (emphasis added)

By failing to provide an adequate buffer, this project results in impacts to water quality and biological resources of the Mission Creek lagoon, resources that are

dependent on water quality. The EIR must address these potentially significant impacts that have arisen as a result of the new information contained in Exhibit 1.

2. Santa Barbara County Local Coastal Plan

Policy 9-37 of the County's Local Coastal Plan (LCP) requires a minimum 100-foot setback for creeks in rural areas, and a 50-foot setback for streams in urban areas. This policy was crafted to ensure that the LCP complied with the Coastal Act which requires that developments and other actions be set back from environmentally sensitive coastal habitats to avoid significant disruption of the habitat (Public Resources Code (PRC) Section 30240(b).) The City, on the other hand, does not have a setback policy for creeks in its Local Coastal Plan. Policy 9-37 (Exhibit 8) of the County's LCP also ensures that the County's LCP complies with PRC Section 30231 by maintaining the water quality and biological productivity of coastal waters. The County policy is included in this letter to illustrate that new development must be kept away from coastal creeks to prevent significant deterioration of habitat and water quality, and that the proposed project fails to do this.

F. Santa Barbara City Policies

1. Policy Update Project

The City of Santa Barbara, in its Municipal Code, currently has only a 25-foot creek setback policy for development along Mission Creek, but this setback was solely developed to reduce erosion and flooding impacts. Recognizing the need to have a biological and water quality based rationale for creek setbacks, the City initiated an intensive review and update of the policies for creek protection. The City has released information (Exhibit 9; labeled Draft – Table of Contents) as part of its funded and year-old Creek Policy Update project, and this information conveys the City's plans to increase the standard creek setback to better protect creek biological and water quality resources. City staff has publicly discussed that the foremost issue in the policy update (Preliminary Recommendations 1.1.1 and 1.1.2) is increasing the creek setback standard, and a 50-foot setback for creeks is actively being discussed by the City's Creek Policy Working Group.

Therefore, the City recognizes the need for better creek setbacks to protect water quality and biological impacts of development, but is not proposing to address this issue in the EIR. The EIR for this project must analyze the adequacy of the project's proposed buffer in light of the information regarding the adequacy of creek buffers, and in light of the significant new information regarding the flood control project.

2. City Airport Specific Plan LCP Policies

While the City does not have an LCP Policy for creek setbacks along Mission Creek, it already has two creek setback policies for the Airport Industrial Specific Plan Area only, and these policies mandate a 100-foot setback around all wetlands and creeks in that area. Policies B-2 and C-4 (Exhibit 10), addressing Biological Resources and Environmentally Sensitive Habitat Areas respectively, require minimum 100-foot setbacks in which no new development is allowed. Considering that the City acknowledges the need for a 100-foot setback along some creeks of similar size and with similar resources to Mission Creek (though the airport creeks lack Tidewater gobies), the DEIR must analyze the impacts of the much smaller proposed setback of the Entrada project.

G. Impacts to Tidewater Gobies

Tidewater gobies exist in the Mission Creek Lagoon. This federally listed fish species is adversely affected by poor water quality. Buffer strips are ways to reduce the impacts of development on stream water quality. By failing to provide an adequate buffer around the widened creek, the project does not propose to protect Mission Creek sufficiently from potentially significant adverse water quality and biological impacts. The EIR must therefore analyze the water quality and related biological impacts as a result of the Entrada Project and cumulative impacts.

H. Need to Analyze and Mitigate Biological Impacts Caused by Lack of Adequate Buffer

The issues described above were not addressed by the City in any previous environmental document for the Entrada project, because, as the City noted, prior to release of the Mission Creek Project's preferred alternative, it may have been "speculative" to assess project and cumulative impacts, alternatives, and mitigation measures affected by a project that was not officially proposed. Now that the proposed Mission Creek Flood Control Project preferred alternative, which specifies that the creek will be substantially widened toward the subject project, was selected by the City, the DEIR for the Entrada project must analyze project impacts related to the exceptionally narrow buffer proposed.

Ample evidence exists in the record to support a fair argument that the project's lack of an adequate riparian buffer may result in significant impacts to biological resources. The EIR must therefore analyze impacts to biological resources related to the new information presented, and must present mitigation measures and alternatives that would reduce those impacts.

I. Mitigation of Biological Impacts

The following measures would help to ensure the potentially significant biological impacts of the project, brought to light by the City's release of the Lower Mission Creek Flood Control Project preferred project alternative, are mitigated to the maximum extent feasible.

1. To reduce the potentially significant impacts that the project will inflict on the lagoons biological resources, a larger setback from the creek for all development, including all parking areas, pavement and structures should be employed.

2. Additional native riparian and wetland species, as appropriate to site's ecological conditions and propagated from locally collected native sources, should be planted throughout the buffer and in all portions of the project landscaping within 100 feet of the creek.

3. In addition to installation of stormdrain filters, construction of bio-filters to handle low runoff flows from the parking areas and hardscape, as well as from the landscaped areas should be undertaken in the buffer area and/or throughout the project to reduce runoff, maintain or enhance recharge and filtration through the soil, and reduce runoff of pollutants.

III. WATER QUALITY IMPACTS

A. Impacts Caused by Lack of Adequate Buffers

According to the Coastal Commission's June 15, 1994 Guidance Document referenced above, without adequate buffers, lagoons and creeks suffer from non-point source pollution problems. With buffers, on the other hand, urban pollutants such as hydrocarbons from street runoff, pesticides and fertilizers from landscapes, trash, and, fecal coliform bacteria and other forms of contaminants are better kept from the waterways. These pollutants are filtered out, broken down and absorbed by microbes, plants and biological and physical processes at work in the soil of the buffer. The Commission's Document states that these buffers "should be designed ... to help minimize the effects of ... pollution arising from urban, industrial and agricultural activities." Buffers help to reduce pollution in estuaries and lagoons, including "non-point source discharges into the watershed and air, domestic and industrial garbage and debris, and biological pollution arising from the introduction of exotic organisms." Absent an adequate buffer, this project threatens to result in significant impacts to the water quality and thus to the wetlands and to the fish, including federally listed tidewater gobies and steelhead that rely on the Mission Creek Lagoon. The impacts to water quality from the inadequate buffer proposed must be fully analyzed in the EIR.

B. Project Clean Water Wetlands and Riparian Buffer Restoration Working Group Report

Further evidence of the water quality impacts caused by the lack of riparian buffers is found in the detailed report prepared by a joint County-City-Public Stakeholder Report prepared as part of Project Clean Water. This report (Exhibit 11, excerpts) describes in detail the processes by which buffer areas filter out and otherwise break down and render harmless pollutants that otherwise would enter waterways. It also discusses the need for providing large enough setbacks for new development to reduce water pollution impacts, and has a detailed list of technical references supporting the notion of riparian buffers to filter non-point source water pollution.

1. Mitigation for Water Quality Impacts

Mitigation for water quality impacts has been spelled out in most of the referenced documents in this letter. Maintaining an adequate buffer by increasing the setback over the proposed project is the most effective manner to reduce the impacts to water resources and biological resources caused by non-point source pollution. Furthermore, the City's reliance on stormdrain filters must be analyzed as a mitigation measure. The effectiveness of these facilities is questionable, because during larger storm events when pollutants are being flushed out of or with the soil and off the hardscapes into the water, water is bypassed around stormdrain filters. Larger buffers with natural vegetation, especially near the parking area, driveway, and buildings, would buffer the creek from water quality impacts during construction (wet weather construction and post construction waste runoff). Removal of a portion of the proposed project and buildings from within the buffer should be analyzed as a mitigation measure for significant water resources impacts, as described above.

IV. VISUAL IMPACTS RELATED TO INADEQUATE CREEK BUFFER

In addition, according to the County's Conservation Element, buffer strips help to create an "aesthetically pleasing backdrop," and thus help to lessen visual impacts of projects. The EIR should therefore analyze the visual impacts of this project's failure to provide an adequate buffer strip, and should analyze at least one alternative that includes an adequate buffer strip to mitigate potentially significant visual impacts.

V. OTHER ISSUES REQUIRING ANALYSIS IN THE DRAFT EIR

A. Entry/Exit Way for Parking Area off Mason Street

The EIR must analyze the impacts of the proposed entry way and exit way at Mason Street, next to Mission Creek. The proposed project plans indicate a two-way entrance/exit here, but the plans for the Mission Creek Flood Control Project show too

narrow an area for this. Is there enough room for a two-way entrance? There is also a proposed habitat expansion zone at this location. The EIR must assess how this area will accommodate the proposed entrance, and what the impacts of it will be given the inadequate setback. Will the project include widening this area to make it a two-way entrance? The EIR should analyze removal of more of the building (then is proposed by the flood control project) as a mitigation measure for this entrance being too close to the proposed creek bank. Biological impacts from headlights entering the lagoon, runoff, pollution, trash and other disturbances must be analyzed.

VI. CUMULATIVE IMPACTS

The Harbor View Inn Project was approved in 1998. The Harbor View Inn Project includes a parking area on one side of the creek and a walkway on the other, both within ten feet of the creek bank. When the creek is widened and if the Entrada project is approved as proposed, there will be significant cumulative impacts that must be addressed in the EIR. These biological, aesthetic and water quality impacts resulting from the lack of an adequate buffer not only at the project site, but throughout this reach of creek, could not have been known when the City prepared the ND on Entrada. They are known now because of the release of the flood control project Draft EIR/EIS.

To better analyze this impact, the EIR should depict the future of the site graphically. The EIR should superimpose Harbor View and the Entrada on the future widened Mission Creek channel to better express the lack of an adequate buffer.

In addition, the City Council on 7-25-00 approved the application for an Army Corps of Engineers Section 404 permit to re-initiate breaching of Mission Creek's mouth. The impacts of this project (Exhibit 12) must be analyzed as they relate to the Entrada and Harbor View projects.

VII. POLICY AND COASTAL ACT CONSISTENCY ANALYSIS

The Draft EIR must contain a thorough analysis of this project's consistency or inconsistency with all City policies, and state and federal laws that relate to it. The project does not have a 25-foot setback from the proposed creek bank, as required under the Municipal Code (Section 28-87-250). It does not have a 100-foot setback as the City requires for creeks in the Airport portion of the Coastal Zone. It also fails to recognize the City's creek policy update process, and the goal of increasing the setback to 50 feet in the City. The EIR should discuss all of these issues as related policy issues, even if the airport policies do not directly apply.

The Draft EIR should also thoroughly analyze this project's consistency with Section 30232 of the Coastal Act, which requires no degradation in water quality and no

reduction in biological productivity. Given the exhibits to this letter, such deterioration is likely to occur without increasing the buffer.

VIII. OTHER IMPACTS OF INADEQUATE BUFFER

Lack of a buffer for the creek will increase night lighting, noise, and human disturbance impacts, as well as pollution, aesthetic and habitat impacts. Please also ensure that the EIR analyzes the impacts of asphalt leachate runoff from all proposed paved areas (Exhibit 13).

Thank you for your consideration of these important issues. Please call me at 805-963-1622 if you have any questions.

Very truly yours,

Brian Trautwein

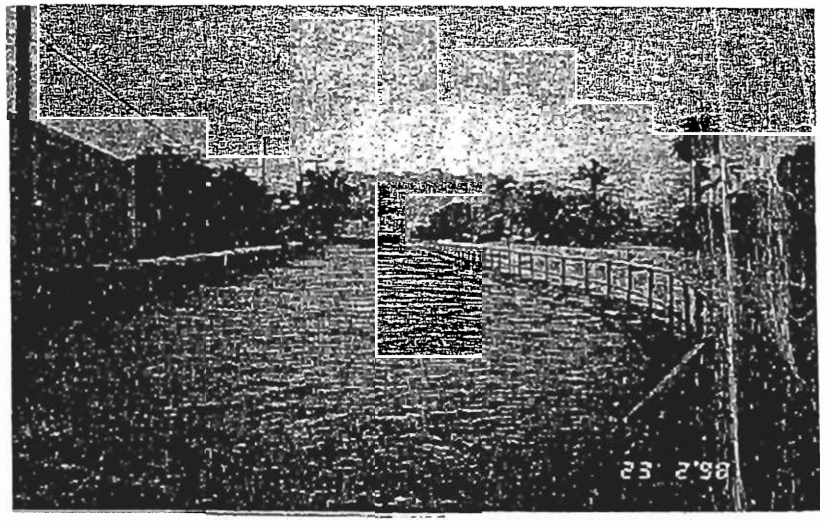
Brian Trautwein
Environmental Analyst

cc: CPA
LWVSB

US Army Corps
of Engineers
Los Angeles District **DRAFT MAIN REPORT & EIS/EIR, DECEMBER 1999**

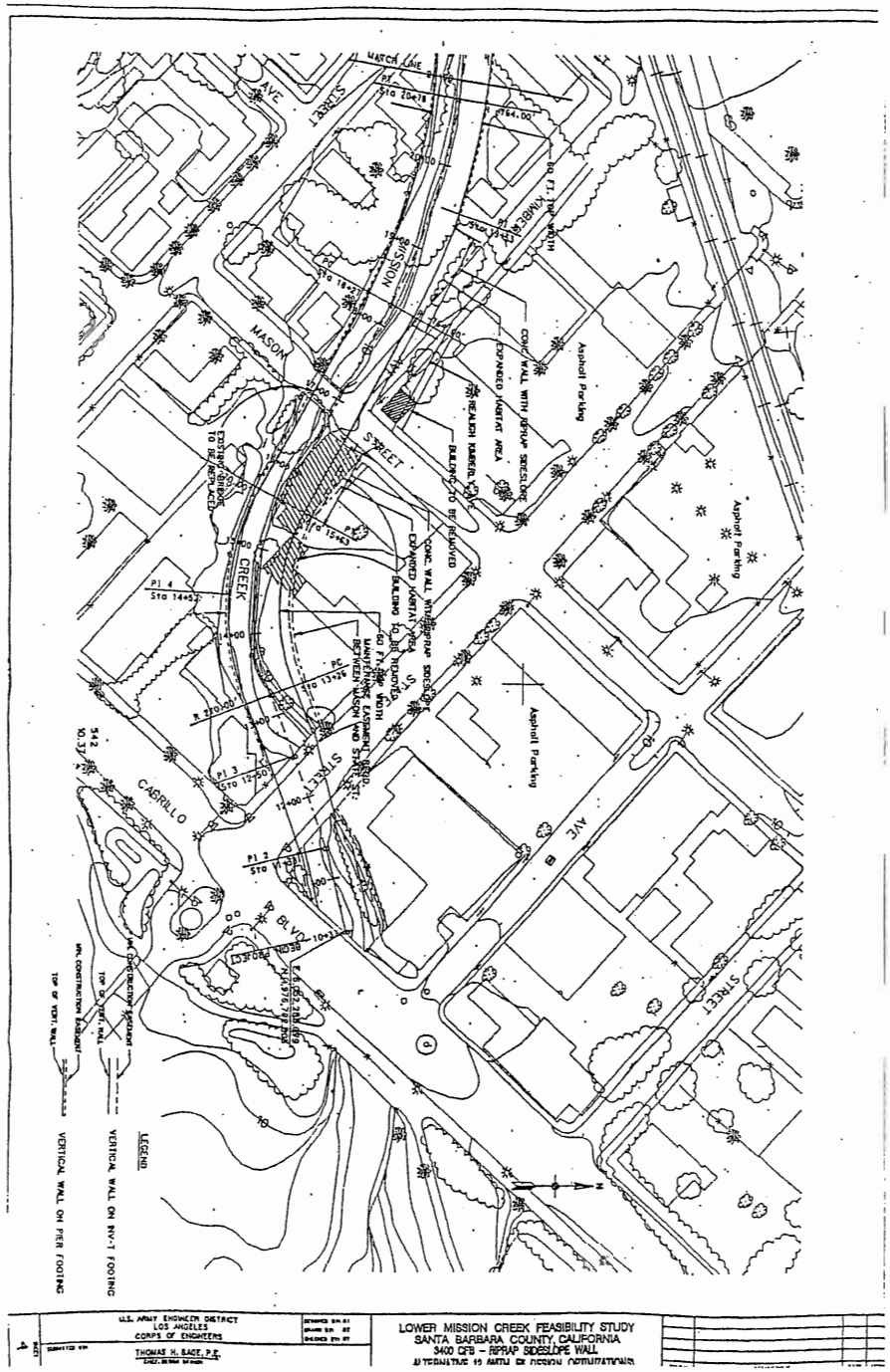
SANTA BARBARA COUNTY STREAMS

LOWER MISSION CREEK FLOOD CONTROL FEASIBILITY STUDY



Los Angeles District, Corps of Engineers
Planning Division, Water Resources Branch
P.O. Box 532711
Los Angeles, California 90053

EXHIBIT 1



Subject: Lagoon issues
Date: Mon, 09 Aug 1999 18:06:27 -0700
From: "Bob Vadas, Jr." <robertv@tib.nmfs.gov>
To: Brian Trautwein, Environmental Defense Center <edcbgt@rain.org>, KEVIN <lafferty@lifesci.ucsb.edu>, dan <dan.logan@noaa.gov>

Dear Brian Trautwein:

I appreciate your consideration of my expertise on California coastal issues. As a professional fisheries biologist acting on my own behalf (this is not a NMFS policy statement), I am concerned about the potential impacts of frequent breaching of sandbars in the Santa Barbara area. Part of my analysis includes consideration of Mission and Sycamore creeks, which have vulnerable fish species that are likely to be harmed by sandbar manipulations. These fishes include threatened-endangered species that spend their entire life (tidewater goby) or their smolt stage in lagoons before heading out to sea (steelhead trout). Indeed, steelhead are well-known to grow well in Pacific Southwest lagoons, as long as artificial breaching does not occur to harm water quality.

Indeed, frequent breaching creates salinity, thermal, and oxygen problems, though it may reduce odors. The tidewater goby, which is present in both creeks but could be doing better there, actually requires non-tidal conditions to be able to spawn in summer. Moreover, it is a weak swimmer that is susceptible to washout to the sea during breaches. Steelhead, which are present in Mission Creek but could be doing better there, are more likely to grow well if lagoons are closed during summer, because good water quality benefits their invertebrate foods and reduces fish physiologic stress. Better growth means that the trout are more likely to survive in the ocean and come back to spawn.

The odor problem is likely a result of watershed-pollution problems that need to be controlled. To use an analogy, frequent breaching of lagoons is akin to drinking alcohol to treat hypothermia, in that the alcohol causes a false feeling of warmness (as more blood flows near the skin) that actually worsens the condition (as less blood goes to the vital organs). Likewise, artificial breaching may temporarily gets rid of odor problems, but can actually worsen water quality by allowing seagrasses and other oceanic debris to get into the lagoon during summer to worsen organic enrichment (and thus odors).

Clearly, a better thought-out solution to the odor problem needs strong consideration, especially in light of federal and state endangered-species legislation. Effective nonpoint-pollution control on the southern California coast would eliminate the need for artificial breaching to the extent that it is unfortunately done. If such manipulation is to be done at all, it should be done less frequently with fish life cycles in mind and in combination with a seagrass-removal program. Please see the paragraph included below
for more information on how to reduce lagoon impacts.

EXHIBIT 2

Please contact me if you require further information. My postdoctoral program goes until the end of August, after which I will be working on estuarine-fish-habitat issues with the Florida Marine Research Institute.

Sincerely,

Dr. Robert L. Vadas, Jr.
NRC Postdoc. Res. Assoc.
NMFS-SWFSC
3150 Paradise Dr.
Tiburon, CA 94920

Tel. (415) 435-3149, x. 251
Fax (415) 435-3675
Internet robertv@tib.nmfs.gov
http://www.pfeg.noaa.gov/tib/staff/vadas.htm

P.S. The following is from my web site, which describes my expertise in California fisheries issues in coastal lagoons:

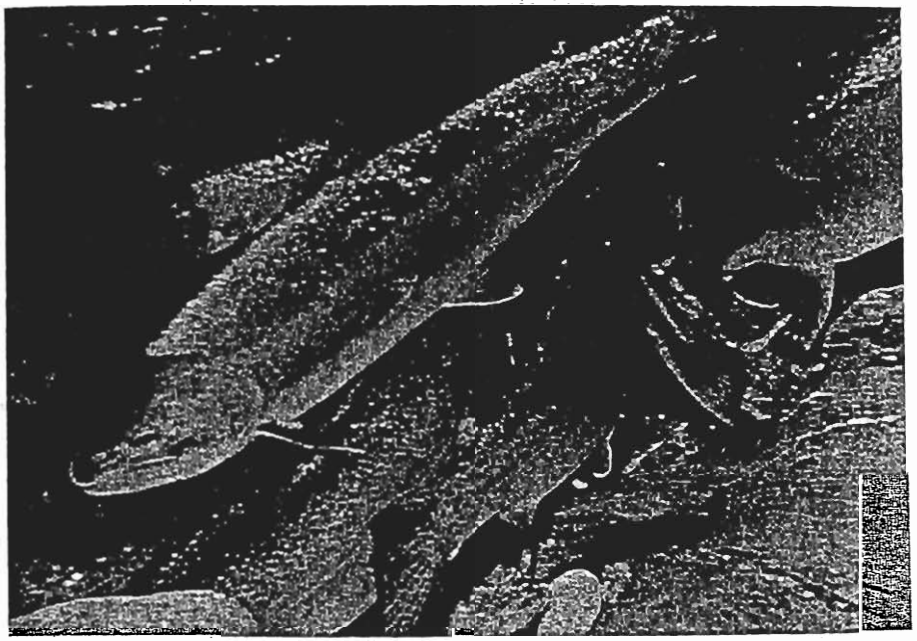
Bob is a NRC postdoctoral research associate in the Salmon Analysis Branch of NMFS-Tiburon, with Dr. Peter B. Adams as present advisor. He is examining the dynamics of anadromous and estuarine-resident fishes and rheophilic frogs in relation to natural and human impacts to stream-lagoonal watersheds on the California coast. He is also involved with ecologic, shallow-water, and fisheries issues in the San Francisco Bay-Delta estuary. His focus is on instream-flow, riparian, and other physicochemical needs of fishes, using empirical modeling and synthesis.

His expertise is both in field biology and instream-flow modeling, including past hydrologic- and riparian-impact work on anadromous salmonids and other Pacific Northwest fishes.

P.S. II. The following is an excerpt from a manuscript that I am working on:

Impacts of sandbar breaching to tidewater goby have been decreased by altering the frequency, timing, or location of breachings, using artificial structures to maintain higher lagoonal depths after breaching (Capelli 1998). As emphasized by Capelli (1998), if artificial breaching is to be done at all, it should simulate natural-breaching dynamics and be done at high tide, the latter to minimize lagoon-depth losses during breaching. Because Pacific Southwest lagoons are often not naturally well-flushed because of low flows and sandbar formation, in contrast to their east-coast counterparts, nutrient control may be especially important in California to avoid artificial breachings for flushing purposes (Capelli 1998).

STEELHEAD RESTORATION AND MANAGEMENT PLAN FOR CALIFORNIA



RESOURCES AGENCY CALIFORNIA DEPARTMENT FISH&GAME

DEPARTMENT OF FISH AND GAME

February, 1996

SPORT FISH RESTORATION

EXHIBIT 3

* **Measures to maintain channel integrity and reduce stranding of juveniles as standard conditions of stream bed alteration permits.**

* **Seasonal restrictions to protect spawning adults and eggs and fry in the gravel.**

* **Stream bed alteration permits with measures necessary to insure that public trust values are protected.**

- **DFG will work with county governments to develop county-wide gravel mining policies and land-use plans that are consistent with Fish and Game Code sections 1505, 1601, 1603, and 6900** **(see page 70).**

Estuaries

It is well known that estuaries are very important rearing areas for juvenile salmonids (Shapovalov and Taft 1954; Smith 1990; Taylor 1992). Diversity and richness of habitat and food sources allow juveniles to attain a larger size before entry into the ocean, thereby increasing their chances for survival in the marine environment. Many of the fry of "ocean-type" chinook salmon, which begin emigration within weeks or a few months after emergence, are dependent upon estuary rearing to obtain smolt size (Healey 1991).

Steelhead populations in small coastal tributaries are more dependent upon the estuarine environment. This may be due to the limited rearing capacity in the headwaters of small stream systems and to the infrequent natural breaching of sandbars which form across the outlet of the estuaries or lagoons. Coots (1973) found that 34% of the juvenile steelhead seined from the San Gregorio Creek lagoon from mid-June through August 1971 (which maintained its outlet to the ocean for most of this time) were sub-yearlings less than 100 mm in length. Marston (1992) found that 50% of the juvenile steelhead inhabiting the Scott Creek lagoon in June and July 1992 were less than 90 mm in length and appeared to be pre-smolts. Smith (1990) analyzed scales from 27 adult steelhead collected from Pescadero Creek and found that 59% had reared in the lagoon. He also estimated that it would take eight stream miles to equal the numerical production of steelhead in the Pescadero lagoon.

Despite the need for permits required by DFG, the Coastal Commission, and the U.S. Army Corps of Engineers, artificial breaching of sandbars which form lagoons and estuaries regularly occurs (Smith 1990). Artificial breachings are done to alleviate flooding and salt water intrusion into ground water and surface diversions, and to provide beach access. In some instances, misguided anglers will breach sandbars on small streams to allow adults

access to the stream. This can have a detrimental effect on survival of juvenile steelhead. Subjecting pre-smolt steelhead to sudden immersion in salt water and the loss of rearing habitat associated with draining a lagoon or estuary can significantly decrease survival.

Recommendations

- **DFG should continue to protect estuarine habitats by opposing non-emergency sandbar breachings so that habitat values are protected.**
  Conflicts between maintaining flood control and water quality and maintaining the lagoon/estuary systems for natural values will undoubtedly continue. Protection and alleviation of conflicts can best be achieved by acquiring ownership or easements for the most sensitive areas.

- **Methods to regulate lagoon levels that alleviate the need for artificial breaching should be developed and implemented.**
  Recent listing and proposed listing of estuary and stream dwelling species under the Endangered Species Act will undoubtedly escalate the conflicts concerning lagoon management. Methods to partially drain lagoons before they reach flood stage, without breaching the sand bar and substantially draining the lagoon, need to be developed and implemented so that flooding and salt water intrusion can be controlled.

Land Acquisition

Acquiring lands or easements to protect critical areas should be a high priority. Competing uses and increased development pressure that will inevitably come with the increasing human population can negate most protections that are currently in place. Court decisions, federal, state, and local government land-use planning, and other protections that protect important steelhead habitats can be overturned in future court decisions or future planning processes. Ownership of a critical area is the most secure strategy for protecting habitat.

- **DFG must identify critical steelhead habitats and begin steps necessary to acquire them. Priority should be given to acquisition of riparian lands that have water rights, stream reaches that support depressed native stocks, and estuaries.**

POLICY ISSUES

In June of 1993, the Fish and Game Commission (FGC) adopted DFG's recommended changes to the *Steelhead Rainbow Trout Policy*. These changes were designed to update the policy and to bring it into better conformance with other policies and Fish and Game Codes. Because FGC policies provide guidance of a general nature, more specific DFG management guidelines are needed.

- **The following will be adopted as Department of Fish and Game Policy:**

STEELHEAD RAINBOW TROUT MANAGEMENT POLICY

Restoration of native and wild stocks is the highest priority for steelhead management. Management emphasis shall be placed on assessment of status, protection of populations and habitat, and restoration.

The greatest threat to this resource is freshwater habitat loss and degradation. The key to preserving habitat is to maintain adequate stream flows, including sufficient flows to provide access between ocean and freshwater environments. Steelhead restoration and management plans should contain the following elements, where appropriate:

- *Provisions for adequate streamflows through enforcement of appropriate Fish and Game codes and other statutes, and negotiations with water agencies and water users.*
- *Acquisition of important habitats and water rights.*
- *Restoration of access to historical spawning and rearing areas through barrier modification, fishway installation, or other means.*
- *Recommendations for watershed protection and land use practices.*

All available steps shall be taken to prevent loss of habitat. Because estuaries and lagoons provide important juvenile rearing habitat, especially in small coastal stream systems, the Department will seek to protect and restore estuarine and lagoon habitats.

Brain Trautwein

From: <envsubset@epamail.epa.gov>
To: Multiple recipients of list <epa-species2@valley.rtpnc.epa.gov>
Sent: Thursday, December 30, 1999 1:23 PM
Subject: Endangered and Threatened Species; Proposed Rule Governing

[Federal Register: December 30, 1999 (Volume 64, Number 250)]
[Proposed Rules]
[Page 73479-73506]
>From the Federal Register Online via GPO Access [wais.access.gpo.gov]
[DOCID:fr30de99-39]

DEPARTMENT OF COMMERCE

National Oceanic and Atmospheric Administration

50 CFR Part 223

[Docket No. 991207324-9324-01; I.D. No 081699C]
RIN 0648-AK94

Endangered and Threatened Species; Proposed Rule Governing Take of Threatened Snake River, Central California Coast, South/Central California Coast, Lower Columbia River, Central Valley California, Middle Columbia River, and Upper Willamette River Evolutionarily Significant Units (ESUs) of West Coast Steelhead

AGENCY: National Marine Fisheries Service (NMFS), National Oceanic and Atmospheric Administration (NOAA), Commerce.

ACTION: Proposed rule; request for comments and notice of public hearings.

SUMMARY: Under section 4(d) of the Endangered Species Act (ESA), the Secretary of Commerce (Secretary) is required to adopt such regulations as he deems necessary and advisable for the conservation of species listed as threatened. This proposed ESA 4(d) rule represents the regulations NMFS believes necessary and advisable to conserve the seven listed threatened steelhead ESUs. Note that this rules applies only to the identified steelhead species. Effects resulting from implementation of activities on other listed species (e.g., bull trout) must be addressed through ESA section 7 and section 10 processes as

EXHIBIT 4

1/6/00

F-75

yearly assessment with NMFS of results, progress, and any problems. If at any time monitoring information, new scientific studies, or new techniques cause PP&R to amend its program or to cause PP&R and NMFS to wish to change the list of chemicals falling outside the scope of the take prohibitions, NMFS will publish notification in the Federal Register announcing the availability of the proposed changes for public review and comment. Such a notification will provide for a comment period of not less than 30 days, after which NMFS will make a final determination whether the changes will conserve listed salmonids. PP&R has been seeking to decrease the extent of its intensively managed riparian areas. NMFS commends that effort, while recognizing that PP&R is constrained by recreational, aesthetic, safety and other responsibilities. This limit on the take prohibitions does not include PP&R's initial planning determinations about the extent of riparian vegetative buffer provided; that question is separable from the integrated pest management approach taken to achieve the conditions planned. This limit focuses on the methods PP&R employs to assure that once it has identified a particular plant or animal as a pest, its control methods are as protective of natural processes, water quality, and listed species as possible.

Limit on Take Prohibitions for New Urban Density Development

As a general matter, significant new urban scale developments have the potential to degrade salmonid habitat and to injure or kill salmonids through a variety of impacts. NMFS believes that with appropriate safeguards, new development can be specifically tailored to minimize impacts on listed salmonids to an extent that makes additional Federal protections unnecessary for conservation of the listed ESU. Through this proposed rule, NMFS proposes a mechanism whereby jurisdictions can be assured that development authorized within those areas is consistent with ESA requirements and avoids or minimizes the risk of take of listed salmonids. Both potential developers and the jurisdictions controlling new development would benefit by assurance that their approvals and development actions conserve listed salmonids.

For example, urban density development in the Portland, Oregon metropolitan area may not occur outside of an adopted urban growth boundary (UGB). Metro, the regional governing body, is in the process of bringing some large areas currently designated as urban reserve areas into the UGB. Before development may commence within such newly included areas, the jurisdiction within which the area lies must prepare and adopt comprehensive plan amendments for urban reserve areas consistent with all provisions of the Metro Urban Growth management Functional Plan, outlining what development will be allowed and the conditions to be placed upon development.

Similarly, cities both within and outside the Metro region and in other states affected by this rule may be approving new urban development on tracts of a size that allows integrated planning for placement of buildings, transportation, storm water management, and other functions. Several areas under consideration for Metro boundary

expansions, and several undeveloped tracts within currently urbanized areas, include streams that support listed salmonids.

This proposed rule further proposes that NMFS will not apply take prohibitions to new developments governed by and conducted in accord with adequate city or county ordinances that NMFS has determined are adequate to help conserve anadromous salmonids. Similarly, within the jurisdiction of the Metro regional government in Oregon, if NMFS finds that Metro's Urban Growth Management Functional Plan (Functional Plan) is adequate, take prohibitions will not be applied to development governed by ordinances that Metro has found consistent with that Functional Plan. NMFS must agree in writing that the city or county ordinances or Metro's Functional Plan are sufficient to assure that plans and development complying with them will result in development patterns and actions that conserve listed salmonids.

In determining whether Metro's Functional Plan or local ordinances are adequate NMFS will focus on 12 issues, discussed here. Many of these principles are derived from Spence, An Ecosystem Approach to Salmonid Conservation (NMFS, 1996) and citations therein. NMFS recognizes that some of these principles require integrated planning for placement of buildings, transportation or storm water management and that those 12 principles will have to be applied in the context within which the development is to occur, which will differ among major new developments and for small, single lot developments or redevelopments. Ordinances or Metro's Functional Plan must assure that urban reserve plans or developments will:

(1) Be sited in appropriate areas, avoiding unstable slopes, wetlands, areas of high habitat value, and similarly constrained sites.

(2) Avoid stormwater discharge impacts to water quality and quantity, and preserve, or move stream flow patterns (hydrograph) closer to, the

[[Page 73494]]

historic peak flow and other hydrograph characteristics of the watershed. Through a combination of reduction of impervious surfaces, runoff detention, and other techniques development can achieve that purpose within its portion of the watershed. Other development design characteristics, stormwater management practices and buffer requirements will prevent sediment and other pollutants from reaching any watercourse.

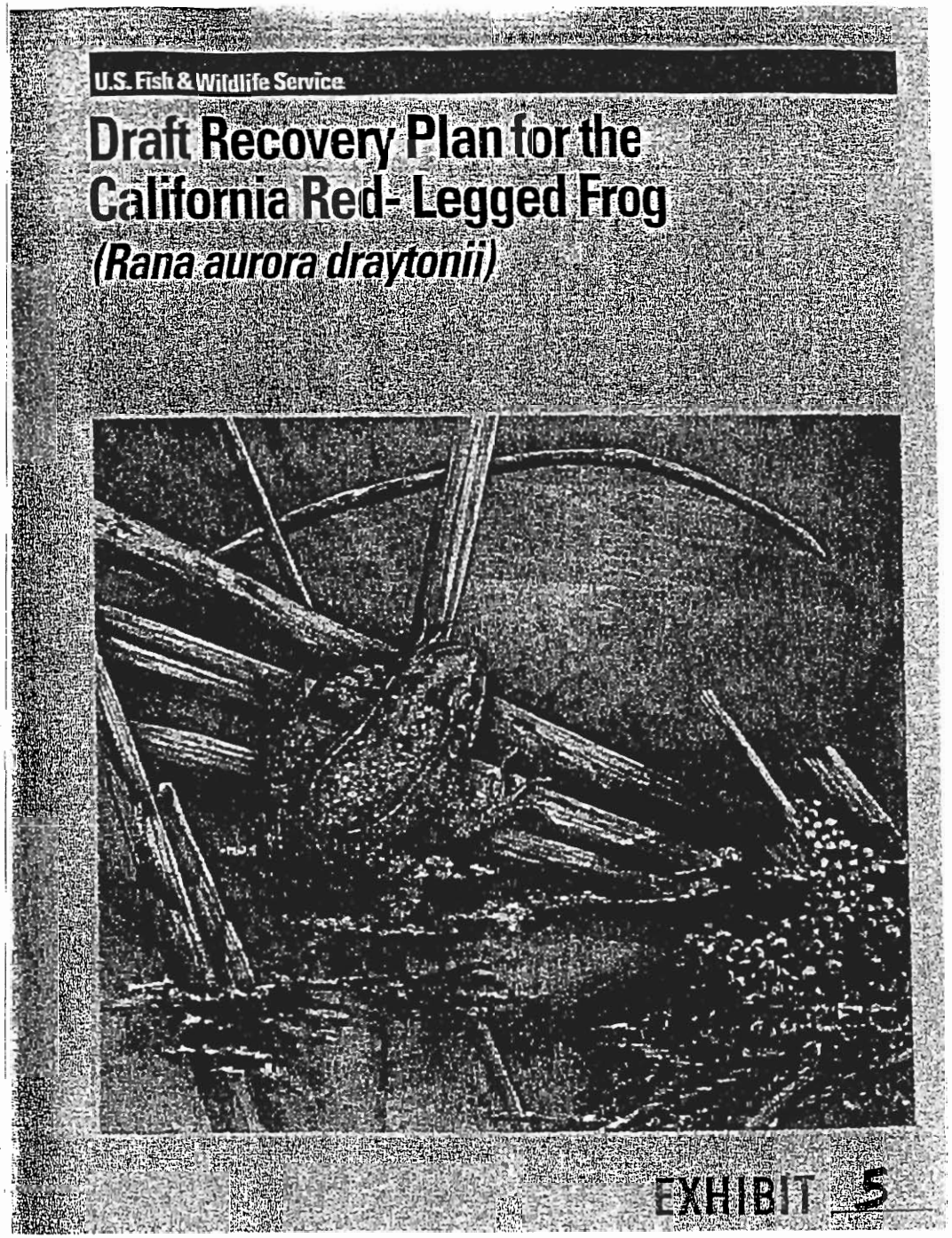
(3) Require adequate riparian buffers along all perennial and intermittent streams. Because of the intensity of disturbance in surrounding uplands, riparian buffers are at least as critical in urban areas as in rural areas. Without adequately vegetated riparian set-backs, properly functioning conditions including temperature control, bank stability, stream complexity and pollutant filtering cannot be achieved.

Retain all existing native vegetation because of its importance in maintaining bank stability, stream temperature, and other characteristics important to water quality and fish habitat. Prevent

destruction of existing native vegetation prior to land use conversions. Where the area contains non-native vegetation, maintained lawn, or is cropped, add or substitute native vegetation within the riparian set-back to achieve a mix of conifer, deciduous trees, understory and ground covers must be planted. To the extent allowed by ownership patterns, the development set-back should be equivalent to greater than one site potential tree height (approximately 200 ft (60 m) or at least to the break in slope for steep slopes) from the outer edge of the channel migration zone on either side of all perennial and intermittent streams, in order to protect off-channel high flow rearing habitat and allow full stream function. Within that set-back the first 50 ft (15 m) should be protected from any mechanical entry or disturbance, structures, or utility installations, and should be dominated by maturing or mature conifers, together with some hardwoods and a vigorous, dense understory of native plants. This inner buffer should also be protected from high-impact recreational use and any trails should be of permeable, natural materials. The inner buffer provides multiple values, including root systems for bank stability. The outer 100-plus ft (30.5 m) of set-back should be entirely in native vegetation (not in maintained lawn) with a mix of conifer, deciduous trees, understory and groundcovers. Disturbances should be minimized.

(4) Avoid stream crossings by roads wherever possible, and where one must be provided, minimize impacts through choice of mode, sizing, placement. One method of minimizing stream crossings and disturbances is to optimize transit opportunities to and within newly developing urban areas. Consider whether potential stream crossings can be avoided by access redesign. Where crossings are necessary, minimize their impacts by preferring bridges over culverts; sizing bridges to a minimum width; designing bridges and culverts to pass at least the 100-year flood and associated debris, and meet ODFW or WDFW criteria; assuring regular monitoring and maintenance over the long term; and prohibiting closing over of any intermittent or perennial stream. The Washington Department of Fish and Wildlife, (WDFW) Habitat and Lands Environmental Engineering Division's ``Fish Passage Design at Road Culverts", March 3, 1999, or ``Oregon Road/Stream Crossing Restoration Guide: Spring 1999" provide excellent frameworks for action.

(5) Protect historic stream meander patterns, flood plains and channel migration zones; do not allow hardening of stream banks. All development should be designed to allow streams to meander in historic patterns of channel migration. Adequate riparian buffers linked to the channel migration zone should avoid need for bank erosion control in all but the most unusual situations. If required by unusual circumstances, bank erosion should be controlled through vegetation or carefully bioengineered solutions. Rip-rap blankets or similar hardening techniques are not allowed, unless bioengineered solutions are impossible because of particular site constraints. Habitat elements such as wood, rock, or other naturally occurring material must not be removed from streams. WDFW's ``Integrated Streambank Protection Guidelines, June, 1998" provide sound guidance, particularly regarding mitigation for gravel recruitment and channel complexity lost through



Text Box A. Guidance for Development of Watershed Management and Protection Plans for the California Red-legged Frog

As noted previously, many land uses adversely affect California red-legged frog populations through degradation of aquatic habitat, fragmentation of breeding and dispersal habitat, degradation of water quality, alteration of flow regimes, sedimentation, and proliferation of non-native predators. However, healthy aquatic and upland habitats can coexist with many land uses provided that best management practices are implemented to minimize impacts.

The following items will assist those developing and implementing watershed management and protection plans by identifying issues that relate to land-use practices in watersheds harboring the California red-legged frog, and by providing guidance and recommendations on the best management practices or conservation measures needed to avoid, minimize, reduce, or compensate for impacts, and protect habitat.

A. Protect suitable habitats and buffers in perpetuity.

i **Encourage and assist counties and owners of large tracts of natural lands to develop preserves, conservation banks, and/or mitigation banks.**

Owners of large tracts of natural land (public and private) should be encouraged to participate in conservation planning by establishing preserves or mitigation banks.

ii **Purchase conservation easements or parcels from willing sellers where acquisitions may protect existing populations, allow for expansion of metapopulations, and increase the quantity of protected suitable habitat within the range of the species.**

Expanding the acreage of protected high quality habitat within core areas and high priority watersheds will contribute to recovery of the California red-legged frog by increasing opportunities for dispersal, population expansion, and recolonization. The delineation of core areas (Figure 9, Table 4, and Appendix C) provides direction on where habitat suitability and connectivity is considered important for long-term recovery of the California red-legged frog and where land acquisition or protection is

necessary. In addition to expanding protection within designated core areas, increasing the connectivity between core areas and occupied watersheds may also increase recovery potential. Therefore, lands that are not designated as core areas should also be evaluated using a landscape approach to determine their possible importance to species recovery.

Several areas have been noted as being very important to the ecological function of adjacent sites that currently support the California red-legged frog. For example, protection of lands upstream from the Corral Hollow Ecological Reserve will increase and maintain suitability of this Reserve for frogs. Protection of coastal areas owned by the Hearst Corporation will allow for protection of frogs in the San Simeon vicinity by maintaining contiguous habitat necessary for dispersal and population expansion. Long-term protection of parcels in these, and other areas, should be pursued via conservation easements or other means of permanent protection.

Isolated sites such as stock ponds, which currently support frogs in the Sierra Nevada foothills, are also in need of protection. Protection of at least a 3-kilometer (2-mile) radius from these isolated ponds may contribute to range expansion in the Sierras. Opportunities to acquire inholdings within National forests should be pursued and vehicles for achieving this may include land swaps. Again, protection of the watershed, including stream reaches up and downstream of known populations and adjacent uplands, will increase the potential for long term suitability of such sites for the California red-legged frog.

iii **Establish appropriate buffers within urban and agricultural areas on a site-by-site basis.**

Buffers should be established and preserved through the same mechanisms used to secure habitat. Incorporation of research on dispersal habits of the California red-legged frog, and influences of habitat type and gradient, should increase the understanding of appropriate buffers by site. Dispersal habits and habitat needs of the frog should be provided to planning agencies so that appropriately sized buffers, habitat areas, and corridors (i.e., dependent on site-specific conditions, topography, etc.) can be built into project plans.

B. Develop and implement guidelines for maintaining adequate water flow regimes, particularly in California red-legged frog habitats downstream of impoundments, water diversions, and residential or industrial developments.

California Coastal Commission

PROCEDURAL GUIDANCE FOR THE REVIEW OF WETLAND PROJECTS IN CALIFORNIA'S COASTAL ZONE

June 15, 1994

Financial assistance for preparation of this document was provided by the Coastal Zone Management Act of 1972, as amended, administered by the Office of Ocean and Coastal Resource Management, National Oceanic and Atmospheric Administration.

EXHIBIT 6

discovered the property owner is in most cases required to apply for an after-the-fact permit. Analysis of this application would follow the same steps outlined above for a normal coastal development permit, and may or may not result in permit approval. Further enforcement and penalties in connection with the violation are determined separately.

IV. Wetland Identification and Delineation:

All coastal development permit applications proposing development in a wetland must include a map delineating the wetland area[12]. A wetland delineation map identifies the wetland's location and pinpoints the boundary line between the wetland and adjacent upland area by determining the extent of one or more key wetland characteristics: hydrology, hydric soils, and hydrophytic vegetation. Other resources such as aerial photographs, national wetland inventory maps, and soil conservation maps may also prove useful in determining the location and size of a wetland. CCC staff must review the resulting delineation map and supporting information carefully, because the delineation results can vary depending on the wetland definition and delineation procedure used (see chapter three for more information).

In the coastal zone, the CCC, with assistance from the DFG, is responsible for determining the presence and size of wetlands subject to regulation under the Coastal Act. The local government also has a direct role in the identification and delineation process in areas with a certified local coastal program. Although the exact procedure has varied somewhat in the past, the DFG wetland definition and classification system (described in chapter three) is the delineation methodology generally followed by the CCC. For wetland development projects requiring Army Corps of Engineers (ACOE) review, the applicant may, in some cases, need to obtain two delineations, one for the coastal development permit, and another for the ACOE Section 404 permit.

A number of ecologically distinct wetland types occur in California, and these ecological differences can also affect the identification and delineation of wetlands. The subject of wetland ecology is discussed further in other parts (particularly chapter four) of this document, but some points relevant to this section are introduced here. In addition to the more traditional fresh- and salt-water marshes, the California coastal zone also contains a number of riparian areas, most often occurring as corridors along streams and rivers. Resource and regulatory agencies have found it hard to strictly define riparian areas as wetlands because of the often transient hydrology, the absence of hydric soils, and the heterogeneous vegetation composition. Yet riparian areas do exhibit many of the functions and values found in other wetlands. In the past, CCC

[12] In determining project related impacts the CCC considers the wetland as it currently exists and not as it may have existed historically. Thus, the accuracy of a wetland delineation is determined, in part, by how recently is was completed.

staff have recognized riparian areas as "environmentally sensitive areas" within the meaning of Coastal Act section 30107.5, and then regulated development through Section 30240. Additionally, Sections 30231 and 30236 provide for the protection of many riparian areas. The semi-arid climate of Southern California also presents problems for the identification and delineation of wetlands. Some wetlands in this part of California can remain dry for one or more seasons due to the Mediterranean climate. Many of the information sources listed above can assist CCC staff in identifying such seasonally wet wetlands. Additionally, Ferren and Fiedler (1993) have developed a technical description useful for identifying wetlands in Central and Southern California.

As evidenced by this brief discussion, accurate wetland identification and delineation can be challenging. CCC staff are encouraged to work with the DFG, the ACOE, local government and any other applicable agencies to minimize delays relating to wetland delineation. Early communication can go a long way to preventing problems later on.

V. Establishing Buffer Areas:

Buffer areas are undeveloped lands surrounding wetlands. These areas act to protect the wetland from the direct effects of nearby disturbance (both acute and chronic), and provide necessary habitat for organisms that spend only a portion of their life in the wetland such as amphibians, reptiles, birds, and mammals. A buffer area should be an integral component of any proposed development project located within or adjacent to a wetland. Buffers should have all of the following characteristics:

1) Buffer width should be a minimum of 100 feet (CCC, 1981)[13]. In some cases, such as when a species requires habitat adjacent to a wetland for part of its life or when nearby development poses increased hazards to a wetland or wetland species, larger buffer areas should be considered.

2) Buffers should work to minimize the disturbance to a wetland from adjacent development. If the adjacent development includes residential areas, the buffer must include a fence and/or a natural (e.g., vegetation or water) barrier to control the entry of domestic animals and humans into the wetland. The buffer should also provide for visual screening in those cases where resident or migratory wetland species are particularly sensitive to human impacts. The use of walls, berms and other barriers should be considered where excessive artificial light or noise is a problem.

[13] In Southern California, the CCC has typically required 100 foot buffers for fresh- and salt-water wetlands and 50 foot buffers for riparian areas. Riparian areas (as defined in the glossary) are considered environmentally sensitive areas, but for a variety of reasons have not always received the same treatment as other types of wetlands.

Conservation Element

EXHIBIT 7

matically swells when vultures which have wintered elsewhere return. It is in the late spring, summer, and early fall months that large numbers of vultures congregate at communal roosts. The row of Eucalyptus on the west bank of San Jose Creek, just north of Highway 101, has been an active roost for approximately 35 years.

Recommendations: The roosting behavior and the dispersion of the Monarch Butterflies in the spring is of extreme scientific interest. Quite obviously, the roosts also are unusual "habitats", of educational value as well as of general public interest. The roosts tolerate some disturbance but should not be subjected to intense development. It is essential that a zone about 100 feet wide surrounds each area. Protection of the Turkey Vulture roost in Goleta should be similar to that given to the Butterfly Trees.

80. Freshwater Marsh (5-2-2)

Freshwater marshes, an extremely uncommon habitat in the County, are well exemplified by the small area near the Goleta Sanitary District Plant, east of the Santa Barbara Airport Terminal. Portions of the Santa Ynez River and a small portion of the Surf Lagoon also are marsh, but these areas are discussed separately. Other small marshes exist like islands, scattered along the coast and the major rivers. The plant community is characterized by the following dominant genera (Munz, 1970): Scirpus, Typha, and Carex. Animals associated with freshwater marshes are waterfowl (Ducks, Geese, Rails, Blackbirds, Bitterns, etc.), certain rodents, frogs, and aquatic reptiles (e.g. Thamnophis couchi). Most members of the freshwater marsh community cannot tolerate a reduction of water quality or quantity. The marsh areas are suitable for light recreation, but should be protected from other uses.

Aquatic Freshwater Communities

90 & 92. Streams (6-2-3, 6-2-2, 2-2-2, 1-2-2)

All the streams of the County are delicate habitats because even a cursory survey indicates that their character is changed greatly, generally to a less desirable condition, by any development of the riparian land. Highway or road construction, housing development, orchards, and even grazing at the intensity that is typical locally profoundly affect the streams. Some undesirable effects are the increased

erosion of banks, increased siltation in slower reaches, more abundant growths of algae, higher water temperatures, loss of fish from the community, and decreased diversity among the invertebrates (insects, worms, crustaceans, etc.) of the biological community. It is easy to understand how these changes detract considerably from the aesthetic value of the streams and the lands bordering them. Other potential problems may not be so apparent. Decay of abundant algal growths at high summer water temperatures may result in unpleasant odors, and in swarms of nuisance insects which breed in the decaying algae. The changes in composition of the insect fauna likewise may result in insect nuisance problems. We have observations, though they have not been tested in any quantitative fashion, that blackfly or buffalo gnat (Simuliidae) larvae become more abundant in those streams heavily influenced by people in the Santa Barbara area. The adults of these flies are serious nuisances, delivering bites which are painful to many people and serving as vectors of several livestock diseases. Although we know of no such disease problems in the County at present, continued destruction of streams may create them in the future.

Protection of stream habitats, enhancing their aesthetic value and avoiding serious problems of the sort just discussed, need not involve any substantial economic burden. Preservation of strips of riparian land, with intact communities of native vegetation analogous to the "buffer strips" now left by many enlightened logging operations, can serve to insulate the stream habitats from many of the insults of human activities. The vegetation, particularly its root systems and associated humus, can serve as a sponge to absorb runoff coming from developed lands in the watershed during times of heavy precipitation. Release of this moisture in drier seasons will serve to dampen fluctuations in streamflow. At the same time, these buffer strips will catch much of the silt carried by the runoff, and catch and bind quantities of important nutrients, such as phosphorus, that otherwise will contribute to excessive fertilization of the stream. Buffer strips should not, of course, be open to grazing; and establishment of these areas would put an end to the slipping, slumping, and erosion of soils commonly caused by the removal of vegetation and the constant pressure of animal traffic on steep slopes along the streams.

Pesticides should not be used on buffer strips except under very exceptional circumstances. On the other hand, soils of the strip may bind certain categories of pesticides which enter in runoff from developed lands. This binding action will delay or prevent the influ-

ence of pesticides upon stream communities and, perhaps, also upon marine communities which receive the stream waters.

A number of streams of the area serve as sewers, receiving septic and nutrient-rich waters from poorly designed septic tank drain fields. In several situations it appears that drain fields are, in fact, non-existent, and the stream receives extremely septic wastes from a pipe presumably connected directly to the sewage system of a dwelling. Establishment and inspection of buffer strips logically could involve correction of these situations.

We do not know how wide buffer strips would have to be to have a substantially beneficial effect with respect to these various objectives. The effectiveness of buffer strips of various widths in protecting streams from logging activities currently is under study (by Dr. D. C. Erman of the University of California, Berkeley, supported by the Water Resources Center), and results of these studies may have some relevance to the situations under consideration here. Obviously, the wider the strip the greater the degree of protection afforded, but full protection may be economically unfeasible. We estimate that as little as 100 feet on either side of a stream could provide a good deal of protection to the stream, although this width would have to be increased where the slope of the land is significant.

Other indirect benefits of buffer strips probably are obvious. These bands of native vegetation traversing a community would provide an aesthetically pleasing backdrop. They could provide areas for rest, relaxation, and nature appreciation. Foot trails, limited picnic facilities, and where the slope is not great, equestrian paths would not interfere greatly with their primary purposes.

Stream Protection Criteria: Streams deserving greater protection than that afforded to those simply classified as delicate habitats include Rattlesnake, Dos Pueblos, Tajiguas, Arroyo Hondo, Refugio, Jalama, Mission above the 250 foot elevation, San Roque above Foothill Road, and San Jose above the U.S.G.S. gaging station at about the 100 foot elevation. In selecting these streams for preservation as scientific study areas, and for protection from human activites other than very light recreation, we considered several factors. Of primary importance was the degree to which the habitat and the aquatic biotic communities already have been altered by human activities. It is important to preserve some communities and habitats that approximate, as nearly as

4737

SANTA BARBARA COUNTY

COASTAL PLAN

JANUARY 1982

(Contains text amendments through December 1992)

Approved by the Board of Supervisors

January 1980

Partially Certified by the State Coastal Commission

March 1981

This plan was prepared with financial assistance from the Office of Coastal Zone Management, National Oceanic and Atmospheric Administration, under the provisions of the Federal Coastal Zone Management Act of 1972.

Resource Management Department
Comprehensive Planning Division
123 E. Anapamu Street
Santa Barbara, CA 93101
(805) 568-2000

EXHIBIT 8

F-82

Description: Streams and creeks provide habitats for many bird, animal, and plant species and serve as major corridors for transporting nutrients and sediments to wetlands and estuaries. They also play a critical role in providing sand for beach replenishment. Streams and creeks provide an environment for plant and animal species that cannot tolerate the arid conditions of the dominant chaparral environment. Riparian vegetation, including California Bays (Umbellularia californica), Willows (Salix spp.), Big Leaf Maples (Acer macrophyllum), and Sycamores (Plantus racemosa), is found along many of the County's streams. Strands of California Walnut (Juglans californica), uncommon in Santa Barbara County, occur along Jalama and Rincon Creeks. Additionally, numerous water-loving organisms including the Monterey Salamander (Ensatina) and the Pacific Pond Turtle (Clemmys marmorata) live within these stream environments.

Streams and creeks affect both the quantity and quality of local water supplies. Heavy siltation of the stream bed can clog the natural flow of water from the surface into groundwater reserves. Increased sedimentation in streams also results in higher flows and increased flood hazards. Polluted runoff from upland development or direct discharge into a stream can infiltrate the groundwater, thereby polluting underground water resources. Development and land use activity within and adjacent to the watercourse has profound effects on stream hydrology, channel geometry, and water quality. Protection of streams requires regulation of land use within the immediate environment as well as control of land use in the larger watershed. The following policies are directed at development within the stream corridor. Regulation of land uses in the watershed is addressed in Section 3.3 of the plan.

Definitions:

Stream: watercourses, including major and minor streams, drainageways and small lakes, ponds and marshy areas through which streams pass. (Coastal wetlands are not included.)

Riparian Vegetation: vegetation normally found along the banks and beds of streams, creeks, and rivers.

Stream Corridor: a stream and its minimum prescribed buffer strip.

Buffer: a designated width of land adjacent to the stream which is necessary to protect biological productivity, water quality, and hydrological characteristics of the stream. A buffer strip is measured horizontally from the banks or high water mark of the stream landward.

Policies:

9-37: The minimum buffer strip for major streams in rural areas, as defined by the land use plan, shall be presumptively 100 feet, and for streams in urban areas, 50 feet. These minimum buffers may be adjusted upward or downward on a case-by-case basis. The buffer shall be established based on an investigation of the following factors and after consultation with the Department of Fish and Game and Regional Water Quality Control Board in order to protect the biological productivity and water quality of streams:

a. soil type and stability of stream corridors;
b. how surface water filters into the ground;
c. slope of the land on either side of the stream; and
e. location of the 100-year flood plain boundary.

Riparian vegetation shall be protected and shall be included in the buffer. Where riparian vegetation has previously been removed, except for channelization, the buffer shall allow for the reestablishment of riparian vegetation to its prior extent to the greatest degree possible.

9-38: No structures shall be located within the stream corridor except: public trails, dams for necessary water supply projects, flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development; and other development where the primary function is for the improvement of fish and wildlife habitat. Culverts, fences, pipelines, and bridges (when support structures are located outside the critical habitat) may be permitted when no alternative route/location is feasible. All development shall incorporate the best mitigation measures feasible.

9-39: Dams or other structures that would prevent upstream migration of anadromous fish shall not be allowed in streams targeted by the California Department of Fish and Game unless other measures are used to allow fish to bypass obstacles. These streams include: San Antonio Creek (Los Alamos area), Santa Ynez River, Jalama Creek, Santa Anita Creek, Gaviota Creek, and Tecolote Creek.

9-40: All development, including dredging, filling, and grading within stream corridors, shall be limited to activities necessary for the construction of uses specified in Policy 9-38. When such activities require removal of riparian plant species, revegetation with local native plants shall be required except where undesirable for flood control purposes. Minor clearing of vegetation for hiking, biking, and equestrian trails shall be permitted.

9-41: All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.

9-42: The following activities shall be prohibited within stream corridors: cultivated agriculture, pesticide applications, except by a mosquito abatement or flood control district, and installation of septic tanks.

9-43: Other than projects that are currently approved and/or funded, no further concrete channelization or other major alterations of streams in the coastal zone shall be permitted unless consistent with the provisions of Section 30236 of the Coastal Act.

DRAFT

Comments by... 8/18/00 written

TABLE OF CONTENTS

EXECUTIVE SUMMARY

MATRIX OF POLICY RECOMMENDATIONS

INTRODUCTION

POLICY RECOMMENDATIONS

SUMMARY/NEXT STEPS

PROPOSED SCHEDULE FOR IMPLEMENTATION

RESOURCES

APPENDICES

A: CURRENT CITY POLICY

B: POLICY REVIEW METHODOLOGY

C: OVERVIEW OF OTHER COMMUNITY PROGRAMS

EXHIBIT 9

RECOMMENDATION #1: Revise the City's municipal code to include ordinances that establish creek development standards and improve creek water quality.

Municipal Code – What are the issues?
Purpose of the municipal code . . .why amendments are needed? What would they achieve?
Introduce which sections of the code address land use regulations, water issues, etc.
Need for innovation – increase density elsewhere, incentives for property owners – new development
Amend Title 29.87???

1. Creek Development Standards

To a large extent, development of the City occurred without an understanding of the need to protect creek resources. As a result, much of the land adjacent to the City's creeks has been developed without attention to these resources. *Further describe existing conditions along city creeks* (inventory?)

However, there are some undeveloped areas and also the potential for properties to be redeveloped in the future. In recent years an increase in new development and the redevelopment of property adjacent to creeks as well as the repair of property damaged by storm waters and flooding, has made it imperative that the City develop policies that better address creek development issues. With this in mind, there is a need for the City to adopt development standards specific to creek areas. Creek development standards are tools the City can use to protect creek resources yet also ensure landowners have reasonable development of property. Creek development standards can address issues that are likely to have some impact on creek resources and could include requirements for:

- ✓ Buildings and other structures to be set back from the creek,
- ✓ Designation of the set back area as a buffer and restrictions on activities within the buffer,
- ✓ Native vegetation landscaping in the buffer area between development and the creek bank,
- ✓ Site drainage requirements to reduce erosion potential
- ✓ Bank stabilization methods with the greatest environmental benefit while protecting property
- ✓ Protection of the creek from polluted stormwater runoff and increased flows
- ✓ Reduced impacts associated with human and domestic animal access.

ADD: Why setbacks, buffer areas, riparian vegetation, etc are important, function. As well as other requirements.

Creek development standards are not a new concept – communities throughout California and other parts of the country have adopted such standards in order to improve water quality, preserve sensitive biological resources and protect property. As part of the policy review, the policies, standards and programs of other communities were reviewed. It is likely that the experiences of these communities will be useful to consider further during implementation of the policy recommendations. At the same time such standards do not lend themselves to a "boiler plate" approach since topography, climate, extent of exiting urban development and long-term restoration and protection goals vary from community to community.

Current Policy

Briefly mention Title 22, 28 and 29 – what is contained within.
Currently one section in the Zoning Ordinance (Title 28) of the City's Municipal Code specifically addresses development along creeks within the City. This section, *Subsection 28.87.250 Development*

DRAFT

Reg. GP consist analysis

Along Creeks, is specific to Mission Creek. The intent of this section is to prevent property damage to adjacent or downstream properties in the event of flooding and to protect public health, safety and welfare. This section requires that all development within 25 feet of Mission Creek meet specific criteria, obtain an environmental assessment and approval by the Chief Building Official. However, it does not address development adjacent to other City creeks, nor does it take into account biological, water quality and hydrological issues. Moreover, property damage as a result of high creek stormwater flows demonstrates that prohibition on development within a 25 foot setback without bank stabilization may not always provide adequate flood and erosion protection. *(citation?)*

The City has developed rules to protect sensitive habitat and wetlands resources at the Airport and surrounding Goleta Slough. The purpose of *Chapter 29.25 Goleta Slough Reserve Zone* in the City's Municipal Code is "to ensure that any development in or adjacent to any wetland area is designed to preserve the wetland as it exists or improve the habitat values of the Goleta Slough Reserve Zone". A number of key mechanisms that protect sensitive habitat and wetland resources are included in the requirements for application for a Goleta Slough Coastal Development Permit. Specifically, habitat mapping and impact assessment as well as a 100 foot buffer is required along the periphery of any wetland. These requirements apply to all creeks within the Goleta Slough Reserve Zone, including: Tecolotito, San Pedro, and . . . . . Although in many ways conditions of the creeks and levels of urban development within the City are very different, habitat protection requirements for the Goleta Reserve Zone may provide direction during the development of similar requirements for the City's main creeks.

ADD: Other sections of the Municipal Code, such as Section 22xx Architectural Board of Review which establishes standards for special design districts such as the Hillside Design District, include measures to reduce potential erosion and loss of sensitive habitat . . . that assist in creek protection if located in a creek area . . .

Creek Development Issues – Case Studies

Without regulatory guidance in the City's municipal code relative to development along creeks, it is often difficult to determine development requirements that would eliminate or reduce potential impacts of new development on creek resources. City staff review of development proposals is hampered by a lack of policy direction.

ADD a brief description of recent projects . . .

Proposed Policy Recommendations

Given these issues it was determined that creek development standards, within the framework of a creek buffer zone, would be critical to the successful implementation of Council's goals. The development of standards for the development of land adjacent to City creeks is consistent with current General Plan policy that states,

> "A set of land use suitability guidelines shall be developed for use in land planning and environmental review process. (Conservation Element, p. ?) and,
>
> "Design and adopt standards for creek development by January 1, 1974. Work with those agencies involved in the creek areas to assure that all creek developments will comply with the adopted standards." (Open Space Element, page 91)

DRAFT

PRELIMINARY DRAFT LIST OF RECOMMENDATIONS

#1: Revise the City's municipal code to include ordinances that establish creek development standards and improve creek water quality.

△ to reg. 28.87.250. for GP cons. for consideration

1. **Creek Development Standards**

1.1.1: Develop an Interim Ordinance

1.1.2: Develop Creek Buffer Zone Ordinance

1.1.3: Develop Outreach Materials for Landowners

1.1.4: Develop training and education for Staff and Board Members

2. **Clean Water**

1.2.1: Evaluate Storm Water Quality Ordinance

1.2.2: Consider policy mechanisms to monitor sewer lateral and septic tank maintenance

1.2.3: Expand the City's Illicit Discharge Detection Program?

1.2.4: Consider policy mechanisms to encourage conversion from septic tank to municipal sewer

1.2.5: Evaluate Retrofit Opportunities

1.2.6: Address Human Habitation and Domestic Animal Access to the Creeks

#2: Update City creek policies in the General Plan, Local Coastal Plan and Master Environmental Assessment. Standard Mitig. Measures.

1. **General Plan**

2.1.1: Update the Conservation Element to address current creek resources and preservation and enhancement objectives.

2.1.2: Update the Open Space and Parks and Recreation Elements to address current creek resource issues and open space objectives.

2. **Coastal Plan** other elements

2.2.3: Update Local Coastal Plan policies

3. **Master Environmental Assessment**

2.3.1: Revise Biological Resources Section

Airport Industrial Area Specific Plan

Biology Policy

B2: In the Coastal Zone, a buffer strip a minimum of 100 feet in width shall be maintained in a natural condition on the periphery of all wetland communities and creeks, based on the "Environmentally Sensitive Habitats of the Airport and Goleta Slough Map, dated January 1998," except as may be necessary to provide minor improvements for flooding and drainage control, and improvements that would enhance protection of the wetlands or creeks while protecting adjacent flood prone activities. Within the Coastal Zone, existing facilities within the creek or wetland setback necessary for Airport operations may be retained and maintained in a normal fashion.

Outside the Coastal Zone, new development shall not occur within 100' of U.S. Army Corps of Engineers jurisdictional wetlands without a demonstration that encroachment is necessary for the project, that wetlands within the Coastal Zone will not be adversely affected and that wetland functions and values shall not be impaired without mitigation. Existing facilities in the buffer outside the Coastal Zone may be retained and maintained in a normal fashion. Only compatible land uses shall be allowed within the setback.

In any wetland or creek buffer, native vegetation shall be planted and maintained wherever feasible (MM 3.16-2 and 3.16-3).

Airport and Goleta Slough Local Coastal Program Land Use Plan

Environmentally Sensitive Habitats Policy

C-4: A buffer strip a minimum of 100 feet in width shall be maintained in a natural condition along the periphery of the wetland communities, based upon wetlands delineated in the map entitled "Airport and Goleta Slough Coastal Plan Wetland Habitats, dated January 1998," and which include open water, coastal salt marsh, salt flats, seasonal wetland meadow, riparian woodland, shrub-scrub thicket and wetland transition habitats. Existing facilities necessary for Airport operations shall be retained and maintained in a normal fashion.

EXHIBIT 10

Report by Wetlands and Riparian Restoration Focus Group Project Clean Water/Project NPDES

February 18, 1999

Darlene Chirman, Habitat Restoration Biologist, Santa Barbara Audubon Society; Andy Caldwell, COLAB; Robert Hansen, Carpinteria Creeks Committee; Sharyn Main, Wendy P. McCaw Foundation; Stephanie Langsdorf, Santa Barbara Urban Creeks Council; Maureen Spencer, Santa Barbara County Flood Control District; John Robinson, Heal the Ocean; Carl Stucky, Carpinteria Valley Association; Brian Trautwein, Environmental Defense Center

I. INTRODUCTION

In 1998, high levels of bacteria closed numerous beaches over extended periods of time, prompting public concern over the health of creeks and watersheds. Before 2002, the County will be required to apply for a federal Clean Water Act NPDES permit and develop a plan to reduce non-point source pollution. With cooperation from interested cities and community groups, the County initiated Project Clean Water and Project NPDES in 1998 to address the immediate concern of bacterial pollution in seven specified County waterways and beach closures caused by that pollution, and the longer term issue of complying with the County's anticipated NPDES permit.

These two efforts have proceeded in concert, and have identified potential sources of bacterial pollution. Through research, participants in these efforts have identified numerous solutions to non-point source water pollution, including bacterial contamination. One solution that is well documented and that reduces levels of bacteria and other water pollutants discharged to the ocean is the use of Vegetative Treatment Systems (also known as bio-filters, bio-swales, and constructed wetlands,) and vegetated riparian buffer areas to breakdown, decompose, filter and assimilate pollutants. Urban and agricultural polluted runoff can be directed through constructed wetland basins that slow flows and cause sediment and pollutants to fall out of the water column, and that break down the pollutants through biological and chemical processes in the soil and root zone. The use of these filtering wetlands to reduce a wide array of non-point source (NPS) pollutants is well documented and is summarized in the following section.

Related to the technique of directing runoff through constructed wetlands, another Project Clean Water and Project NPDES-identified solution to water pollution is the protection and restoration of riparian buffers which similarly breakdown, assimilate and filter pollutants from runoff. The restoration of riparian vegetation on creek banks and flood plains adjacent to creeks can physically reduce the amount of pollution, including bacteria, that enters creeks and flows to the ocean. Vegetation in these areas slows overland runoff and allows bacteria and nutrients to be decomposed and taken up by the

EXHIBIT 11

plants and biological and chemical activities in the soil. According to water quality experts and agencies, revegetation of denuded stream beds with low-growing herbaceous vegetation significantly increases the decomposition rate and the filtration capacity within streams and thus reduces the amount of pollution reaching the ocean. The Wetland and Riparian Habitat Restoration Working Group, established by the County and participating cities as a subcommittee to the Problems and Solutions Committee of Project Clean Water and Project NPDES, is charged with investigating the use of wetlands, bio-filters and riparian restoration to reduce water pollution, with identifying mechanisms to promote riparian and wetland restoration, with identifying funding sources available for restoration, and with developing a report recommending steps to be taken to implement these solutions.

This report focuses on the restoration of riparian areas and creek buffers, and on the construction of wetlands within the seven identified watersheds to address the immediate concern of bacterial contamination and the longer-term concern of other NPS pollutants subject to NPDES regulation. It therefore is meant to be a tool to serve both Project Clean Water and Project NPDES. Since it can take two to three years to fully realize the benefits of these types of solutions, the Wetland and Riparian Habitat Restoration Working Group recommends that specific wetland and riparian restoration programs be established to reduce NPS pollution as soon as possible so that their water quality benefits can enjoyed sooner rather than later.

II. RELATIONSHIP OF PROBLEM TO SOLUTION: THE USE OF RIPARIAN BUFFER RESTORATION AND BIO-FILTERS TO REDUCE WATER POLLUTION

A. The Problem: Non-Point Source and Bacterial Pollution

The EPA has concluded that non-point source pollution accounts for over 65% of the total pollution load to surface water in the U.S., and as such, it is recognized as the major cause of surface water quality impairment in the country (US EPA, 1989; Johengen & LaRock, 1992). Traditional pollutants, i.e. nutrients and sediments, are the main causes of surface water impairment. Agriculture is the single largest cause of water quality impairment in lakes and rivers in the U.S., contributing nitrogen, phosphorus, sediment, bacteria, viruses and other microorganisms, and pesticides (Baker, 1992, p. 5; US EPA, 1993). This is relevant because some of the polluted watersheds of concern to Project Clean Water are dominated by agricultural land uses, including Rincon and Jalama Creeks. Other contributing factors to, and sources of, non-point pollution include urban runoff (especially metals), runoff from streets and highways, disposal of solid waste, and modification of watershed hydrological dynamics (Baker, 1992, p. 5.)

Specific NPS pollutants associated with urban runoff include domestic fertilizers, herbicides, pesticides and other outdoor chemicals, nutrients and biological agents from septic system discharges and direct discharge of human waste, nutrients and bacteria from domestic animal wastes in surface runoff, oil, grease, antifreeze, hydraulic fluids, asphalt surface leachate and other chemicals from vehicle parking areas and roadways, and construction related wastes (e.g. rinse waters from concrete work, painting, etc.) (Draft EIR for Toro Canyon School, Santa Barbara County, 1998.) Effects of these principle contributors to NPS pollution have been difficult to remedy with conventional methods (Hammer, 1992). The US EPA has identified the protection, restoration and construction of wetlands and riparian habitats as a critical management measure for controlling NPS pollution (US EPA, 1993, p. 7-8.) According to the California Coastal Commission, "wetlands should be installed in areas where they will serve a polluted runoff-abatement function." Wetlands, including the plants, soils and microorganisms in the substrate, prevent pollutants from entering adjacent waterbodies "through filtration, deposition, infiltration, absorption, adsorption, decomposition, and volatilization," as well as denitrification (California Coastal Commission, 1995.)

B. Riparian Buffer Restoration

Riparian areas are vegetative ecosystems along water bodies. They characteristically have high water tables and are subject to periodic flooding. These zones may contain both uplands and wetlands. According to the EPA's Non-Point Pointers, in order to curb NPS water pollution, "one strategy is the restoration of degraded wetlands and riparian zones with NPS pollution control potential."

As noted above, the EPA considers the protection and restoration of riparian areas and creek buffers as an important management measure for controlling a wide range of NPS pollutants. "Riparian areas can play a critical role in reducing NPS pollution, by intercepting surface runoff, subsurface flow, and certain ground-water flows. Their role in water quality improvement includes processing, removing, transforming, and storing such pollutants as sediment, nitrogen, phosphorus, and certain heavy metals. Thus, wetlands and riparian areas buffer receiving waters from the effects of pollutants, or they prevent the entry of pollutants into receiving waters" (U.S. EPA, 1993).

"The pollutant removal functions associated with wetlands and riparian area vegetation and soils combine the physical processes of filtering and the biological processes of nutrient uptake and denitrification" (Ibid.) Riparian areas reduce bacterial contamination in waterways by these same processes. Also, by reducing sediment and nutrients in creek water, riparian areas reduce the environmental factors favorable to the growth and persistence of bacteria in creek environments, specifically, nutrient rich streambed sediments. "Fecal coliform concentrations in stream sediments are 100 to 1,000 times those found in the overlying water column" (RWQCB, December, 1993, p. 16). Therefore, to reduce conditions favorable for bacterial persistence, it is important to control erosion and sedimentation.

The Coastal Commission's Procedural Guidance Manual: Addressing Polluted Runoff in the California Coastal Zone, (1996,) also recommends the protection of riparian areas to protect water quality. It suggests a number of measures "to protect sensitive areas (such as streambanks, wetlands, estuaries, ponds, lake shores, and riparian zones)." This same document also suggests that communities "establish adequate setback distances near wetlands, water bodies, and riparian areas" as a means to control water pollution in urban runoff. The Coastal Act itself (Section 30231) requires that the biological productivity and

the water quality of coastal wetlands be maintained to support optimal levels of aquatic life. However, this requirement only applies to new developments in the coastal zone and does not address new development in inland areas or existing pollution sources. General Plan policies for the protection of wetlands and riparian areas can address inland pollution sources, but also only apply to new developments. In addition to new or updated policies designed to protect creeks and wetlands from new development (see report from Ordinance and Policy Review Working Group,) local government programs are needed to facilitate a proactive restoration program for riparian areas and wetlands with NPS reduction potential.

Similarly, the County's LCP (which is derived from the Coastal Act) includes policies to protect wetland and riparian areas from the effects of new development in the coastal zone, and in doing so, to protect water quality. These policies include the provision of specific setbacks of 50-feet along creeks (LCP Policy 9-37) in part to protect the "water quality of streams" from new development. LCP Policy 9-9 requires a 100-foot minimum setback for new development from all coastal wetlands. Where riparian vegetation is to be removed as part of new coastal development (in cases for "necessary public infrastructure" that cannot be designed to avoid the habitat, the LCP requires revegetation with native plants in the riparian buffer. The Goleta Community Plan also has similar creek setback and revegetation provisions for new development in inland areas of that community. However, these polices are meant only to ensure that new development does not degrade existing resources and water quality. Because the vast majority of NPS water pollution is resulting from existing development, a more proactive riparian restoration program is needed to help filter pollutants from developed landscapes before runoff carries those pollutants into creeks, estuaries and the ocean. Strategies and concepts for implementing a proactive creek restoration program are discussed later in this report.

Since "the portion of a wetland or riparian area immediately below the source of non-point pollution may be the most effective filter," (Cooper et al., 1986; Lowrance et al., 1983; Phillips, 1989) these areas should be protected, restored and created, where appropriate, throughout watersheds. "Degraded wetlands and riparian areas should be restored, where possible, to serve an NPS pollution abatement function" (US EPA, 1993). Locations for these activities must not be limited to areas only adjacent to or within major stream channels. Appropriate locations for these activities include creek-side riparian locations, degraded wetlands of all types, drainage channels and ditches, stormdrains, culverts and other sites or water conveyance facilities that used to or that could support such filtering habitats. The California Urban Creeks Council has "day-lighted" many creeks in the bay area, meaning that they have restored above ground flows through filtering riparian and wetland plant communities by removing stormdrains and culverts. In areas where such drainage facilities exist in this area, they too can be converted back into filtering wetland and riparian habitats.

The EPA urges those interested in NPS pollution prevention to "consider wetlands and riparian areas and their NPS control potential on a watershed or landscape scale." These areas should be considered part of a continuum of filters (or if currently lacking riparian or wetland vegetation, as potential filters) along drainages, tributaries, creeks, rivers and coastal waters that together serve an important NPS abatement function. Given this perspective, riparian restoration (and wetland construction) should occur throughout watersheds, not only along major creeks, but in and beside tributaries, ditches, drainages, swales and stormwater conveyance facilities such as storm drains and culverts. Projects to create or enhance natural vegetative filters should be sited throughout watersheds in and along drainage ways, tributaries, topographical depressions that convey, or that could convey runoff, and stormdrains that could feasibly be "daylighted," as well as around and within creeks and wetlands.

Local Planning Departments play a key role in protecting and restoring local waterways (Stauffer, *The Water Crisis: Constructing Solutions to Freshwater Pollution*, 1998, p.55). Citizens can also take an active role in restoration: many groups have organized tree planting events or clean-up days in their local watersheds. Stauffer cites Toronto's Task Force to Bring Back the Don River. This group recommends creating wetlands and planting native trees and shrubs to reduce water pollution, flooding and erosion and to stabilize streambanks. This is something that volunteer conservation and restoration organizations have been doing locally for a number of years, although this effort needs to be augmented by more citizen restoration projects and by local government programs and activities.

C. Bio-filters, Wetlands and Vegetative Treatment Systems

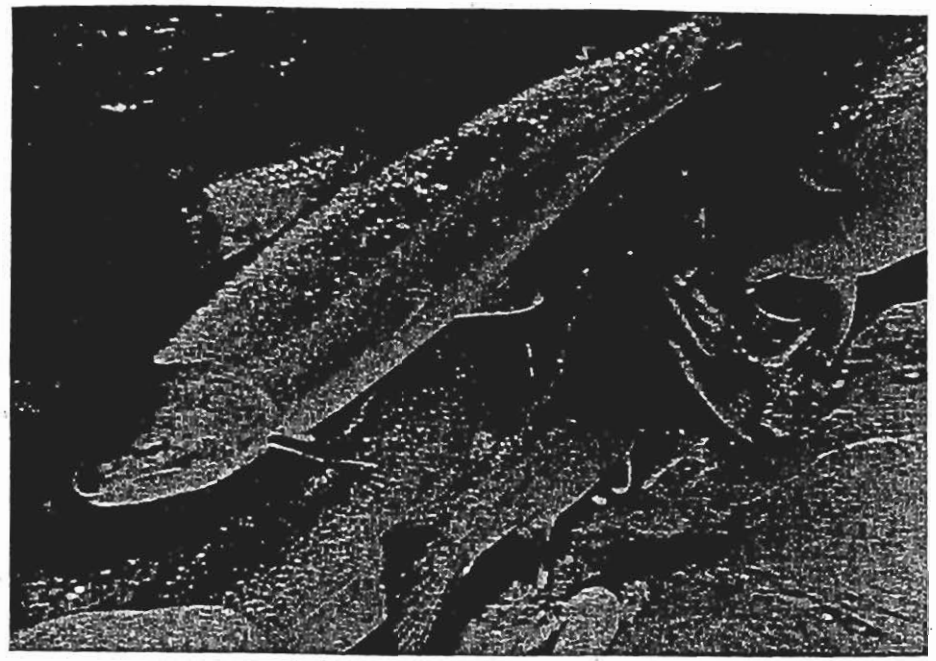
Natural wetlands provide functional benefits that may be grouped into three categories: ecosystem support, buffering of runoff rates, and water quality improvement (Hammer, 1992, p. 50). Specific benefits include: reduction of flooding along rivers and streams by reducing and desynchronizing peak runoff; slowing flood water velocities; support of wildlife; improved dissolved oxygen content for decomposition of organic compounds and oxidation of metallic ions; augmenting base flows in streams and rivers; cleansing contaminated waters flowing through natural wetlands by a combination of physical, chemical, and biological activities; and sediment storage (Hammer,1992, p. 51; Knight, 1992, p. 97).

Natural wetlands can perform substantial improvements in water quality and quantity in local and large scales (Feierabend, 1989; Hammer 1992; Mitsch, 1992; Olson 1992). "Wetlands have produced a reduction in BOD, pathogens, and some hydrocarbons, and excel in nitrogen removal. They have been reported to act as sinks for trace metals, phosphorus and suspended solids," which include fecal material (Association of Bay Area Governments, 1981). Constructed wetlands have been defined (Hammer, 1992) as:

> "*engineered systems designed to simulate natural wetlands to exploit the water purification functional value for human use and benefits. Constructed wetlands consist of former upland environments that have been modified ... for the primary purpose of contaminant or pollutant removal from wastewaters or urban runoff.*"

Created wetlands have started to receive serious attention as low-cost, efficient means to clean many types of wastewater including sources of NPS pollution, such as urban stormwater runoff and agricultural runoff (Feierabend, 1989; Hammer & Bastian, 1989; Livingston, 1989; Silverman, 1989; Meiorin, 1989; Daukas, Lowry & Walker, Jr., 1989; Hammer, 1992).

STEELHEAD RESTORATION AND MANAGEMENT PLAN FOR CALIFORNIA



DEPARTMENT OF FISH AND GAME

February, 1996

EXHIBIT #12

* Measures to maintain channel integrity and reduce stranding of juveniles as standard conditions of stream bed alteration permits.

* Seasonal restrictions to protect spawning adults and eggs and fry in the gravel.

* Stream bed alteration permits with measures necessary to insure that public trust values are protected.

► **DFG will work with county governments to develop county-wide gravel mining policies and land-use plans that are consistent with Fish and Game Code sections 1505, 1601, 1603, and 6900** **(see page 70).**

Estuaries

It is well known that estuaries are very important rearing areas for juvenile salmonids (Shapovalov and Taft 1954; Smith 1990; Taylor 1992). Diversity and richness of habitat and food sources allow juveniles to attain a larger size before entry into the ocean, thereby increasing their chances for survival in the marine environment. Many of the fry of "ocean-type" chinook salmon, which begin emigration within weeks or a few months after emergence, are dependent upon estuary rearing to obtain smolt size (Healey 1991).

Steelhead populations in small coastal tributaries are more dependent upon the estuarine environment. This may be due to the limited rearing capacity in the headwaters of small stream systems and to the infrequent natural breaching of sandbars which form across the outlet of the estuaries or lagoons. Coots (1973) found that 34% of the juvenile steelhead seined from the San Gregorio Creek lagoon from mid-June through August 1971 (which maintained its outlet to the ocean for most of this time) were sub-yearlings less than 100 mm in length. Marston (1992) found that 50% of the juvenile steelhead inhabiting the Scott Creek lagoon in June and July 1992 were less than 90 mm in length and appeared to be pre-smolts. Smith (1990) analyzed scales from 27 adult steelhead collected from Pescadero Creek and found that 59% had reared in the lagoon. He also estimated that it would take eight stream miles to equal the numerical production of steelhead in the Pescadero lagoon.

Despite the need for permits required by DFG, the Coastal Commission, and the U.S. Army Corps of Engineers, artificial breaching of sandbars which form lagoons and estuaries regularly occurs (Smith 1990). Artificial breachings are done to alleviate flooding and salt water intrusion into ground water and surface diversions, and to provide beach access. In some instances, misguided anglers will breach sandbars on small streams to allow adults

access to the stream. This can have a detrimental effect on survival of juvenile steelhead. Subjecting pre-smolt steelhead to sudden immersion in salt water and the loss of rearing habitat associated with draining a lagoon or estuary can significantly decrease survival.

Recommendations

- **DFG should continue to protect estuarine habitats by opposing non-emergency sandbar breachings so that habitat values are protected.** Conflicts between maintaining flood control and water quality and maintaining the lagoon/estuary systems for natural values will undoubtedly continue. Protection and alleviation of conflicts can best be achieved by acquiring ownership or easements for the most sensitive areas.

- **Methods to regulate lagoon levels that alleviate the need for artificial breaching should be developed and implemented.** Recent listing and proposed listing of estuary and stream dwelling species under the Endangered Species Act will undoubtedly escalate the conflicts concerning lagoon management. Methods to partially drain lagoons before they reach flood stage, without breaching the sand bar and substantially draining the lagoon, need to be developed and implemented so that flooding and salt water intrusion can be controlled.

Land Acquisition

Acquiring lands or easements to protect critical areas should be a high priority. Competing uses and increased development pressure that will inevitably come with the increasing human population can negate most protections that are currently in place. Court decisions, federal, state, and local government land-use planning, and other protections that protect important steelhead habitats can be overturned in future court decisions or future planning processes. Ownership of a critical area is the most secure strategy for protecting habitat.

- **DFG must identify critical steelhead habitats and begin steps necessary to acquire them. Priority should be given to acquisition of riparian lands that have water rights, stream reaches that support depressed native stocks, and estuaries.**

TIDEWATER GOBY

(*Eucyclogobius newberryi*)

DRAFT RECOVERY PLAN

Prepared by

Edgar D. Ballard

Camm C. Swift

for

Region 1

U. S. Fish and Wildlife Service

Portland, Oregon

Approved_____

Regional Director, U.S. Fish and Wildlife Service

Date: _____

Task Force 1993). Unfortunately, the exact consequences are seldom predictable, but can include disease, parasite, and other possible interactions affecting tidewater gobies.

Cattle grazing and feral pig activity have resulted in increased sedimentation of coastal lagoons and riparian habitats, removal of vegetative cover, increase in ambient water temperatures, and elimination of plunge pools and undercut banks utilized by tidewater gobies. In San Luis County, increased sedimentation into Morro Bay has significantly accelerated the conversion of wetland habitats to upland habitats (Josselyn et al. 1989). Cattle continue to graze freely both upstream and in many of the lagoons supporting tidewater gobies (K. Worcester, personal communication, 1991, as cited in Service 1994).

Breaching of lagoons during the dry season adversely affects tidewater gobies in a variety of ways. The lagoon reforms in a week or so, but often stabilizing at a lower level. Usually the level of the lagoon falls a meter (3.3 feet) or more which can strand many tidewater gobies in shallow pools, and leave breeding burrows above the water level, subject to desiccation and predation. The salinity increases considerably since freshwater inflow is low or absent in the dry season at many sites. Higher salinity can be tolerated, but is suboptimal for tidewater gobies. Adjacent marshes, which are used by tidewater gobies for protection from predators and as productive areas in which to

ow, become unavailable. Tidewater gobies have been found to grow faster and larger in adjacent marshes when compared with those in the open waters (Swenson 1994). Because adjacent marshes are shallower than the lagoon, small changes in the lagoon water levels can have major effects on the amount of this habitat that is available for tidewater gobies.

Breaching of lagoons occurs for several reasons. 1) To ameliorate real or imagined stagnation and attendant odors of the water, 2) to prevent flooding of adjacent structures built within the flood plain of the lagoon, 3) to remedy a mosquito problem by reducing the vegetated marsh adjacent to lagoons (thought to reduce breeding habitat for mosquitos), and 4) to cause a new spread (or fan) of fresh deposited sediment in the surf, improving the break of the waves for surfing (Tom Evan, Department of Biology, University of California, Santa Barbara, personal communication, 1993). The extent of this practice is not well known.

The barrier sand bar and sand content of the lagoon are dependent on sediment supplies from upstream. Interruption of sediment flow by upstream barriers is a well known cause of wasting away of sandy beaches (Bascom 1976). Lack of sediment flow into lagoons hinders formation of barrier bars and helps cause many of the attendant difficulties of non-closure.

Several introduced animal and plant species have become

established in tributaries and lagoons along the California coast. The presence of beaver, (*Castor canadensis*), and the plants arundo, (*Arundo* sp.), and salt cedar, (*Tamarisk pentandra*), has the potential to change the natural characteristics of tidewater goby habitat. Beaver activities trap nutrients in bottom sediments, preventing them from moving downstream (Naiman et al. 1993). Beaver ponds seemed to provide slow water for tidewater gobies in at least one drainage, San Antonio Creek, Vandenberg Air Force Base. The drought of the early 1990's dried up much of the lower creek above the lagoon. Beaver ponds may trap excess sediments and prevent it from reaching the lagoon, such as soil from agricultural fields, thus affecting the composition of lagoon sediments. Both plant species are rapidly expanding their range in southern California. Salt cedar is known to exacerbate the channelization of streams by stabilizing banks and forcing water to flow in a more restricted channel (Ohmart, et al., 1988). Salt cedar thus has the effect of contributing to the degradation of tidewater goby habitat associated with channelization. In 1993, large windrows of arundo stems were massed throughout the Santa Margarita River Lagoon, and may provide substrate for shimofuri gobies if they gained access to this area. Providing habitat conducive to this exotic species could prevent the tidewater goby from reestablishing itself in this locality. Another estuarine plant from the eastern United States, smooth cordgrass, (*Spartina alterniflora*), was intentionally introduced into San Francisco Bay. It is rapidly spreading and also alters channel forming

characteristics of flowing tidal and non-tidal areas which could degrade habitat conditions for tidewater gobies (Daehler and Strong 1995). It seems only a matter of time before it spreads to other California estuaries.

Vehicular activity in the vicinity of lagoons threatens tidewater goby habitat by disturbing wetland vegetation, as well as contaminating the watercourse with petroleum. Toxic spills from highway or railway accidents is a threat when it occurs in the vicinity of tidewater goby habitat. The presence of recreational vehicles close to lagoons also poses a threat because of dumping of waste and grey-water tanks (Holland 1992).

H. Conservation Efforts

Swift et al. (1989) summarized all previous work and presented the first biological study of the species. This work and two earlier contract reports (Swift 1975; Swift et al. 1990) to the California Department of Fish and Game led to the state listing as a species of special concern in 1980. It was elevated to fully protected status in 1987. The U.S. Fish and Wildlife Service listed it as Category 2 species in 1982, and a Category 1 species in 1991. It was listed as an endangered species effective March 7, 1994, and is fully protected under the provisions of the Act (Federal Register, Vol. 59, p. 5494).

Several agencies have regulatory authority on activities that affect the tidewater goby. The U.S. Fish and Wildlife Service enters into Section 7 consultations on federal projects that impact federally listed species habitat. Section 10 (a)(1)(B) incidental take permits are administered for non-federal actions that impact federally listed species habitat. Section 6 funding is provided for actions that will aid the recovery of listed species. The U.S. Fish and Wildlife Service also enforces Section 9 provisions which makes it illegal to ship, sell or offer for sale in interstate or foreign commerce any listed species, or part thereof, taken in violation of the Endangered Species Act. The California Water Quality Control Board regulates water appropriation from streams, that potentially affects most if not all tidewater goby populations. The California Department of Fish and Game also has regulatory authority over any modification of water courses, and has already impacted many coastal projects. Cal Trans continues to replace bridges over coastal wetlands, many of which hold tidewater gobies. Breaching and activities in lagoons are adjusted to the life cycle of the tidewater goby at Little Pico Creek, Malibu Lagoon and other localities and are regulated through a permit process by the U.S Army Corps of Engineers. Breaching lagoons in the summer has become controversial at many localities given the various interests noted above.

As yet unpublished regional studies of its biology have been

extant tidewater goby habitat. As opportunities become available to decrease the levels of sedimentation, additional management actions should be taken.

Task 1.2.6 Maintain prohibition of anthropogenic breaching of lagoons

Anthropogenic breaching during the dry season is known to cause dramatic fluctuations in water and salinity levels in tidewater goby habitat. The resulting degradation and loss of habitat may diminish the tidewater goby population's ability to recover from population decreases that frequently occur during the winter. The current prohibition of artificially breaching lagoons should be continued to provide optimal conditions during the summer and fall, when reproduction is at its highest and freshwater inflow is at its lowest.

Task 1.2.7 Develop and implement management strategies to avoid further direct net loss/alteration of habitat.

Dredging, draining and filling of wetlands have resulted in the immediate loss, decrease in size, and degradation of tidewater goby habitat. Installation of bridges, dikes, tidal gates, and culverts have also contributed to the

Proposed Final
Environmental Impact Report

for the proposed

New Toro Canyon Elementary School
and
Summerland School Closure

State Clearinghouse #97031070

September 1998

Lead Agency:
Carpinteria Unified School District
1400 North Linden Avenue
Carpinteria, California 93013

Prepared by:
Santa Barbara County
Planning and Development
Comprehensive Planning Division
123 East Anapamu Street
Santa Barbara, California 93101

EXHIBIT A3

plan, soil would be excavated from the northwestern portion of the site and would be used to fill the southeastern area, basically leveling the site. If soils are left exposed during the rainy season, erosion and off-site sedimentation may occur. The existing cut flower operation may leave the soil barren for periods of time and may contribute to off-site sedimentation. However, because the field flowers are planted and harvested in "flushes," it is unlikely that the entire site would be left barren all at once; hence, the potential for erosion and sedimentation may be increased as a result of the school construction. Other construction-related activities that have the potential to adversely affect water quality include use of asphalt paving on driveways and parking areas and concrete work. Paints, solvents, fuels, lubricants and other materials associated with the construction activities can also adversely affect water quality if improperly used or stored at the project site.

Since more than five acres of land area would be disturbed, construction of the school would require compliance with the State of California's General Permit to Discharge Storm Water Associated with Construction Activity (General Permit) (see Mitigation Measures, Section 4.2.5). The General Permit includes requirements to implement pollution prevention control measures and /or best management practices (BMPs) to achieve water quality standards, monitor storm water discharges, maintain monitoring records, and prepare a Storm Water Pollution Prevention Plan (SWPPP) for the construction activities.

Operational Activities

The greatest potential sources of pollution from operation of the new school would be associated with the automobile parking areas, and residual fertilizers, herbicides, and pesticides from landscape maintenance. Herbicides and pesticides have been historically used at the site in support of the agricultural activities. Primary contaminants from parking areas would be from spills, leaks or blow-by of motor lubricants, antifreeze and hydraulic fluids, and asphalt surface leachate. Because of the direction of on-site drainage (which is toward the southeast, away from the creek), these materials are not expected to directly enter the creek along the western site boundary but would be discharged into the creek downstream of the site along with other runoff collected along Toro Canyon Road. The increased volume of runoff from the site combined with the introduction of new sources of storm water pollutants has the potential to adversely affect water quality in Toro Creek.

In summary the project has the potential to result in the following impacts to surface water quality:

Impact WATER-1: Construction-related impacts to water quality in Toro Creek. Grading activities and improper storage and use of construction-related materials and construction activities could result in ***potentially significant*** impacts to surface and ground water quality.

Impact WATER-2: Operational impacts to water quality in Toro Creek. Drainage from landscaped areas and from the new roadway and paved surfaces could result in ***potentially significant*** impacts to surface and ground water quality.

FEBRUARY 8, 2001 THE INDEPENDENT | NEWS 21

No Silver Bullet in Entrada EIR

Those hoping the long-awaited environmental impact report on Bill Levy's proposed waterfront time-share condo proposal would contain the silver bullet required to stop the project—or scale it back—found little cause to celebrate with the report's release this Monday. The report concluded that Levy's proposal—known as Entrada de Santa Barbara—would have "adverse" but "less than significant environmental effects" on surrounding views. Consequently, the report added, "No measures are necessary or required in order to mitigate the project's public view impacts." Levy commented, "We couldn't be more pleased. Everyone here is jumping for joy." Even so, the report said there were many ways Levy could reduce the size and bulk of his project—mostly by eliminating third story units—and make it more compatible with the surrounding neighborhood and Santa Barbara's traditional low-lying waterfront architecture.

The matter goes before the Planning Commission March 15, where some commissioners and activists will continue to press to remove some or all of the third story. Levy said he won't budge. "Whether the project is two stories or three stories makes no real difference, the view is gone."

—Nick Welsh

EXHIBIT D

CITY OF SANTA BARBARA
COMMUNITY DEVELOPMENT DEPARTMENT
DRAFT MITIGATED NEGATIVE DECLARATION – ENV97-0452

Pursuant to the State of California Public Resources Code and the "Guidelines for Implementation of the California Environmental Quality Act of 1970," as amended to date, this Draft Mitigated Negative Declaration has been prepared for the following project:

PROJECT LOCATION: 20-120 State Street, 15 East Mason Street, 15 West Mason Street, 125 State Street, and the State Street right-of-way between the Mission Creek Bridge and the Union Pacific Railroad right-of-way.

PROJECT PROPONENT: Santa Barbara Beach Properties, L.P. and the Redevelopment Agency of the City of Santa Barbara

PROJECT DESCRIPTION: The proposed project involves the redevelopment of three major blocks of properties at the intersection of State Street and Mason Street with a total of 17,532 square feet of commercial retail uses and 81 vacation ownership units. The 81 vacation ownership units each have a lock-out unit, thereby providing for the possibility of a total of 162 transient lodging units. A total of 210 parking spaces are proposed, including a 145-space parking structure south of the railroad right-of-way between State Street and Helena Avenue. Public right-of-way alterations are also proposed, including a reconfiguration of on-street parking on Mason Street and Helena Avenue, a widening of the sidewalk and narrowing of the State Street roadway along the project frontage consistent with the State Street Plaza design north of U.S. Highway 101, and other alterations. These alterations are proposed in cooperation with the Redevelopment Agency, to allow for the consistent development of the portion State Street between the railroad right-of-way and Cabrillo Boulevard. A traffic signal is also proposed at the intersection of State Street and Mason Street. A 2,500 sq. ft. Visitor Information Center (VIC) is also proposed within the proposed project (in addition to the 17,532 sq. ft. of commercial uses) along State Street adjacent to the railroad tracks. The proposed VIC would provide its required parking within the surface parking lot previously approved for 125 State Street as part of the Coastal Development Permit for the Railroad Depot Improvement Project.

MITIGATED NEGATIVE DECLARATION FINDING: Based on the attached Initial Study prepared for the proposed project, it has been determined that the proposed project will not have a significant effect on the environment.

Silvia A Andalero
Environmental Analyst

May 5, 1999
Date

[E:\USERS\PLAN\Environ. Review\Neg Decs\Entrada DND.doc] Revised 5/4/99

003400

EXHIBIT E

CITY OF SANTA BARBARA
COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION

SECOND REVISION TO
INITIAL STUDY/ENVIRONMENTAL CHECKLIST ENV97-0452

PROJECT TITLE: Entrada de Santa Barbara Project (20-120 State Street, 15 East, Mason Street, 15 West Mason Street, 125 State Street), including Visitor Information Center and Lower State Street Alterations

his Initial Study has been completed for the project described below because the project is subject to review nder the California Environmental Quality Act (CEQA). The information, analysis and conclusions contained this Initial Study are the basis for deciding whether a Negative Declaration (ND) or Mitigated Negative eclaration (MND) is to be prepared or if preparation of an Environmental Impact Report (EIR) is required to rther analyze impacts. Additionally, if preparation of an EIR is required, this Initial Study will be used to cus the EIR on the effects determined to be potentially significant.

PPLICANTS/PROPERTY OWNERS NAME AND ADDRESS

anta Barbara Beach Properties, L.P.
20 El Paseo
anta Barbara, CA 93101
ontacts: Bill Levy or Bill Medel

Redevelopment Agency of the City of Santa Barbara
P.O. Box 1990
630 Garden Street
Santa Barbara, CA 93102-1990
Contact: Teri Harmon-Malinowski

OJECT ADDRESS/LOCATION (See Vicinity Map, Exhibit 1)

)-120 State Street, 15 E. Mason Street, 15 W. Mason Street, 125 State Street, and the State Street right-of-way etween the Mission Creek Bridge and the Union Pacific Railroad right-of-way.

ACKGROUND

December 1998, an Initial Study for an earlier version of the proposed project had been completed. The ecember 1998 Initial Study concluded that the project, as proposed at that time, could have a potentially gnificant impact on aesthetics in that it could affect public scenic vistas, and could have a demonstrable gative aesthetic effect in that it may be substantially inconsistent with El Pueblo Viejo Guidelines and the sual guidelines/criteria of the Local Coastal Program. The Initial Study, therefore, concluded that further sessment of the aesthetic impacts of the proposed project in an Environmental Impact Report (EIR) would be quired.

Notice of Preparation of a Draft EIR was released on December 4, 1998, and a scoping hearing was held fore the Planning Commission on December 17, 1998. During this hearing, the applicant presented additional sual simulations of the project and the Planning Commission provided staff with direction regarding policy ncerns and mitigation for the potentially significant aesthetic impacts which included a redesign of the project increase building setbacks, provide more variations in building heights, and provide façade variations along ate Street and Mason Street frontages.

003402

'owing the scoping hearing, staff considered the additional information and direction provided at the hearing, d requested the applicant provide additional visual simulations from points along State Street. Based on the sual simulations presented by the applicant and comments received from the Planning Commission at the

ENVIRONMENTAL CHECKLIST

The following checklist contains questions concerning potential changes to the environment that may result if proposed project is implemented. If no impact would occur, **NO** should be checked. If the project might result in an impact, check **YES** indicating the potential level of significance as follows:

Known Significant: Known significant environmental impacts. Further review needed to determine if there are feasible mitigation measures and/or alternatives to reduce the impact.

Potentially Significant: Unknown, potentially significant impacts which need further review to determine significance level.

Significant, avoidable: Potentially significant impacts which can be mitigated to less than significant levels.

Less Than Significant: Impacts which are not considered significant.

1. AESTHETICS. Could the project:	NO	YES Level of Significance
a) Affect a public scenic vista or designated scenic highway or highway/roadway eligible for designation as a scenic highway?		Less Than Significant
b) 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?		Less Than Significant
c) Create light or glare?		Less Than Significant

Discussion:

a-b. SETTING: The proposed project site is located in Santa Barbara's Waterfront area and is visible from State Street and Stearns Wharf. The proposed project site is also visible from Cabrillo Boulevard, which although not a State-designated scenic highway, is generally considered to be a local scenic resource.

The three-acre Entrada de Santa Barbara project site is located in a commercial area which is occupied by retail and restaurant uses, the Californian Hotel along State Street, and auto repair uses along Helena Avenue and Mason Street. The site is generally open to the public and unscreened along State Street. The automotive uses along Mason Street and Helena Avenue are partially screened from public view.

003410

ANALYSIS:

i. Summary: The current design of the proposed project is the result of extensive input from both the Planning Commission and the Historic Landmarks Commission, as discussed in the Background section of this Initial Study (Page 1). Both the Planning Commission and the Historic Landmarks Commission provided policy direction regarding consistency with the aesthetic impact criteria presented below. Staff acknowledges the positive support given to the current proposal and has evaluated the design issues associated with the proposed project as presented below. Therefore, while the project may have an adverse effect on existing aesthetic resources within the waterfront area by removing some mountain views, impacts to aesthetics, and views in particular, are anticipated to be less than significant.

ii. Analysis of Earlier Project Designs: A variety of tools were used to analyze earlier designs of the proposed project and aid in the identification of aesthetic issues and evaluation of visual impacts. These tools included site plans, elevations, photo and video simulations, and visits to the site to view the project area with and without story poles. These tools were used to identify the following major design issues during earlier reviews of the proposed project:

- Consistency with Local Coastal Program provisions regarding view protection.
- Consistency with Waterfront Area Aesthetic Criteria regarding openness, lack of congestion, naturalness, and rhythm.
- Appropriateness of size, bulk, and scale of the project relative to the surrounding area.
- Appropriateness of proposed setback modifications.

Throughout the review of earlier designs of the proposed project, the overall direction from the Planning Commission and Historic Landmarks Commission regarding project design relative to these issues has included the following:

- Preserve views of mountains through project.
- Provide a feeling of openness appropriate for the waterfront area.
- Reduce the overall scale of the project.
- Improve pedestrian access through the project.

iii. Proposed Project as Currently Designed: The applicant submitted the current proposal in response to the above direction from the Planning Commission and Historic Landmarks Commission. The major design changes in the current proposal, as compared to earlier designs, include the following:

- Overall reduction of parking structure height on Site C from four levels to two levels.
- Incorporation of the VIC into Site C. The viewing tower on Site C is no longer a project component.

003411

- Provision of open plaza areas on Site C at the corner of State and Mason Streets and in front of the proposed VIC adjacent to the railroad right-of-way, and on Site B along State Street.

- Creation of view corridors through Site C from State Street towards the mountains and through Site B from State Street to Helena Avenue.
- Increased setbacks of buildings on Sites B and C along Mason Street to widen the view corridor to the mountains and reduce the "canyon effect" along Mason Street.
- Reduction of the height of buildings on Sites B and C along all of the street frontages and increasing the setback for second and third story buildings to provide for more of a "wedding cake" or "stair-step" effect.

Other components of the current project design which have not substantially changed from earlier project designs include the following:

- Substantial increase in building coverage on the overall project site from the existing 64,500 square feet of development to development of up to 224,000 square feet, including the proposed parking structure.
- The existing Californian Hotel would remain at its current four-story level, and the proposed new development on site A would maintain its proposed three-story configuration, including zero setbacks along State and Mason Streets.
- Portions of the proposed buildings encroach into the 20-foot setback along State Street and Mason Street required in the HRC-II zone.
- Design features which will enhance the visual resources of the area, including: undergrounding of utility poles and lines; additional landscaping; street improvements; preservation of historic buildings; and enhancement of the "gateway" view to the City from the Waterfront and Railroad Depot.

iv. Threshold of Significance for Aesthetic and Visual Resource Impacts: Given the subjective nature of visual assessments, it is difficult to have an objective, quantifiable threshold for determining the significance level of aesthetic and visual resource impacts. However, after review and consideration of various applicable City policies, standards, and regulations, a City standard has been established such that it is determined that a project could have a significant impact on aesthetic and visual resources if it will:

- Conflict with Municipal Code Chapter 22.22 as it relates to construction in the El Pueblo Viejo Landmarks District, and the related guidelines;
- Conflict with the applicable vista protection standards, scenic resource protection requirements, or design criteria of the City;
- Degrade or significantly interfere with existing visual quality of the project area;
- Strongly contrast with the surrounding environment through excessive bulk, signage, or architectural projections;
- Alter or obstruct existing public viewsheds from or across the project site, including scenic features associated with designated or potential scenic highways;

003412

- Cause the removal of significant amounts of vegetation; loss of important open space; substantial alteration of natural character; lack of adequate landscaping; or extensive grading visible from public areas;

- Cause incompatibility with surrounding uses or structures due to project size, massing, density, or scale;

- Produce substantial light and/or glare which poses a hazard or substantial annoyance to adjacent land uses (sensitive receptors in particular);

- Reduce lighting in a particular area, thereby contributing to a public safety hazard;

- Be inconsistent with lighting ordinance, sign ordinance, etc.;

- Be inconsistent with LCP policies regarding visual resources; or

- Be inconsistent with the City of Santa Barbara Waterfront Area Design Guidelines and Waterfront Area Aesthetic Criteria for New Development Assessment.

The significance criteria outlined above are both subjective and qualitative in nature, and are therefore open to interpretation as to the point at which an impact becomes significant for purposes of environmental review. As such, environmental review of potential aesthetic and visual resource impacts must consider a balance of the policies outlined in the above criteria to set the threshold of significance for individual projects.

v. Analysis of Proposed Project as Currently Designed: In its analysis of the proposed project's aesthetic and visual resource impacts, staff reviewed direction from the Planning Commission and Historic Landmarks Commission on earlier project designs including the recent work sessions, and analyzed the site plans, elevations, View Corridor Study, and view profiles graphic[1] submitted for the proposed project. From this direction and information, staff concluded the project conformed to the aesthetic and visual resource significance criteria as follows:

- Conflict with Municipal Code Chapter 22.22 as it relates to construction in the El Pueblo Viejo Landmarks District, and the related guidelines: The HLC had given its general support of the project in 1998, with comments primarily on design details, such as façade variations and setbacks, which could be resolved following Planning Commission review of the proposed project. During the joint work sessions with the Planning Commission in April, 1999, the HLC was supportive of the current proposal, noting the proposal was consistent with the overall goals of the EPV area.

- Conflict with the applicable vista protection standards, scenic resource protection requirements, or design criteria of the City: The City has adopted several polices and requirements related to vista and scenic resource protection, including the following:

    - Local Coastal Plan Policy 9.1 (part): The existing views to, from, and along the ocean and scenic coastal areas shall be protected, preserved, and enhanced.

[1] The information from the view profiles graphic allows for mountain views to be calculated from any point within the proposed project

- General Plan Conservation Element Policy 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.

In addition, view preservation was identified as an important concern in Theme 1A of the Downtown/Waterfront Visioning Report, which stated as a goal that, "The beautiful vistas and sweeping views of the ocean and mountains are maintained."

The Planning Commission and Historic Landmarks Commission generally agreed that buildings on Sites B and C could cause some blockage of mountain views if view corridors through these sites are maintained and directed that the design "capture" mountain views. The applicant responded to this direction by increasing setbacks of buildings on Sites B and C along Mason Street to widen the view corridor towards the mountains to the east; lowering the parking structure and providing a view corridor through Site C towards the mountains to the north from the corner of State and Mason Streets.

The applicant provided a View Corridor Study of the project and graphical representations of view profiles through the project (Exhibit 8). In particular, the View Corridor Study indicates that the current project design provides opportunities for mountain views from most points on the west side of State Street and many points on the east side of State Street from the South property lines of Site A and B to the railroad right-of-way. These mountain views are "framed" views as seen by looking through the project's plazas and paseos, and looking east along Mason Street and north along State Street (see Exhibit 9, View Corridor- State at Mason perspective, and State Street Elevation of Areas B and C). A section view looking north through the plaza at the corner of State and Mason Streets on Site C indicates that the upper 25 percent of Gibraltar Peak would be visible through this view corridor.

Previously submitted photo simulations of an earlier design versions of the proposed project taken from the Dolphin Fountain, East Cabrillo Blvd., and Eladio's, all indicate that views of the mountains would be maintained from these points (Exhibit 10). Since these photo simulations were developed, the proposed project has been redesigned to reduce its size, bulk, and scale. These photo simulations therefore represent a "worst-case" scenario of the proposed project's impacts on mountain views and indicate that mountain views are maintained from these three vantage points.

Therefore, based on the Planning Commission's and HLC's general support of the proposed project relative to view preservation and the analysis provided above, the proposed project appears to be potentially consistent with view protection polices of the City and is not anticipated to result in a significant impact to mountain views.

- Consistency with design criteria is discussed above under Conflict with Municipal Code Chapter 22.22 as it relates to construction in the El Pueblo Viejo Landmarks District, and the related guidelines and below under Be inconsistent with the City of Santa Barbara Waterfront Area Design Guidelines and Waterfront Area Aesthetic Criteria for New Development Assessment

- Degrade or significantly interfere with existing visual quality of the project area: Visual quality is discussed above under Conflict with the applicable vista protection standards, scenic resource protection requirements, or design criteria of the City.

- Strongly contrast with the surrounding environment through excessive bulk, signage, or architectural projections: The Planning Commission and HLC found the size, bulk, and scale of the proposed project to be generally acceptable, based on the reduction of the overall scale of the buildings on Sites B and C, and the provision of public plazas and paseos on sites B and C. Relative to signage, the proposed project will be required to comply with the City's Sign Ordinance.

- Alter or obstruct existing public viewsheds from or across the project site, including scenic features associated with designated or potential scenic highways: The proposed project's view effects are discussed above under Conflict with the applicable vista protection standards, scenic resource protection requirements, or design criteria of the City.

- Cause the removal of significant amounts of vegetation; loss of important open space; substantial alteration of natural character; lack of adequate landscaping; or extensive grading visible from public areas: The project site is currently developed with various commercial and open yard uses, and minimal landscaping. Development of the proposed project will not result in significant alteration to natural features as none exist. In addition, grading associated with the project will not be visible. The proposed project will result in an improvement to the aesthetics of the area by providing high quality architectural design and new landscaping improvements.

- Cause incompatibility with surrounding uses or structures due to project size, massing, density, or scale: The Planning Commission and Historic Landmarks Commission found the size, bulk, and scale of the proposed project to be generally acceptable.

- Produce substantial light and/or glare which poses a hazard or substantial annoyance to adjacent land uses (sensitive receptors in particular): As discussed in item 1c below, the project is required to comply with the City's Outdoor Lighting Ordinance.

- Reduce lighting in a particular area, thereby contributing to a public safety hazard: The project is anticipated to provide lighting for the project similar to that of other uses in the area and at a level to protect public safety, and as discussed in item 1c below, the project is required to comply with the City's Outdoor Lighting Ordinance.

- Be inconsistent with lighting ordinance, sign ordinance, etc.: As discussed in item 1c below, the project is required to comply with the City's Outdoor Lighting Ordinance. The project will also be required to comply with the City's Sign Ordinance.

- Be inconsistent with LCP policies regarding visual resources, and Be inconsistent with the City of Santa Barbara Waterfront Area Design Guidelines and Waterfront Area Aesthetic Criteria for New Development Assessment: The project site is located in component four of the City's Coastal Land Use Plan (LUP). This component extends from Chapala Street to Santa Barbara Street. The LUP recognizes that much of this component is undeveloped or inappropriately developed. New development must include "thoughtful consideration for the effects development will have on the scenic and visual qualities of this coastal area."

The LUP identifies the following as local issues concerning visual resources:

- potential view blockage by new development,
- inappropriate and poorly maintained development, and
- upgrade of unattractive areas.

The relevant visual resources policies include:

- Policy 9.1: The existing views to, from, and along the ocean and scenic coastal areas shall be protected, preserved, and enhanced. This may be accomplished by one or more of the following:

  a. Acquisition of land for parks and open space;
  b. Requiring view easements or corridors in new developments;
  c. Specific development restrictions such as additional height limits, building orientation, and setback requirements for new development;
  d. Developing a system to evaluate view impairment of new development in the review process.

- Policy 9.2: A special design district in the waterfront area..., shall have area-wide architecture design standards developed by the ABR [and HLC] for their use in their design review of new development.

Waterfront Area Design Guidelines were developed and are utilized in review of projects by both the Architectural Board of Review and the Historic Landmarks Commission. The Waterfront Area Design Guidelines include both area wide guidelines and guidelines for specific zoning districts. The area-wide guidelines contain provisions for intensity of development, landscaping, views/viewshed, El Pueblo Viejo - Landmarks District, parking lots, paseos, buffer, equipment, trash areas, lighting, and signage.

To implement LUP Policy 9.1, the Guidelines state that the vistas of the ocean, harbor, and mountains from State Street, Cabrillo Boulevard, and Garden Street, must be carefully considered, maintained and where feasible, enhanced.

Maintaining appropriate building setbacks, providing view corridors, incorporating existing skyline trees and avoiding bulky, massive structures can protect and enhance these vistas.

Relative to maintaining appropriate building setbacks, the proposed addition to the Californian Hotel would follow the zero-setback configuration of the existing hotel building. Of the approximately 20,800 sq. ft. of new building area on Site A (including covered parking), a total of 2,523 sq. ft., or 12 percent of this area would be located within the required 20-foot building setback.

The buildings on Site B and C are designed in a stair-step configuration along State Street, in which the first level of the buildings are set back ten feet from the property line, and the upper levels are set back a minimum of twenty feet. Open arcade structures are proposed to extend to the property lines. Building setbacks along Mason Street and Helena Avenue vary from approximately five to fifteen feet.

Of the approximately 56,400 sq. ft. of new building area on Site B (including parking), a total of 7,154 sq. ft., or 13 percent, would be located within the required 20-foot setback. Of the approximately 104,000 sq. ft. of new building area on Site C (including parking), approximately 12,642 sq. ft., or 12 percent, would be located within the required 20-foot setback.

The justification for the proposed setback modifications for Site A is that the setback line follows the existing building frontage. The justification for the proposed setback modifications for Sites B and C is that the proposed project is dedicating three public plaza areas along State Street, in addition to public paseos through these project sites, as outlined in the project description. A comparison of the approximate amount of setback encroachments and plaza and paseo areas is as follows (see Exhibit 11 for detailed setback statistics):

	Area of setback encroachment	Area of public plaza/paseo area
Site A	2,523 sq. ft.	0
Site B	7,145 sq. ft.	11,997 sq. ft.
Site C	12,642 sq. ft.	12,669 sq. ft.
TOTALS	22,310 sq. ft.	24,666 sq. ft.

The Planning Commission and HLC were supportive of the concept of a trade-off of the proposed setback encroachments in exchange for the provision of on-site public open space. Both commissions agreed that a variation in setbacks on the project site would be appropriate for this project.

The proposed project's view effects and view corridors are discussed above under Conflict with the applicable vista protection standards, scenic resource protection requirements, or design criteria of the City.

No existing skyline trees exist on the proposed project site.

In order to address mass and bulk of buildings, the Guidelines refer the Historic Landmarks Commission to LUP Policy 12.2 in determining the appropriate intensity of development, as follows:

> Policy 12.2 New developments within the City's Waterfront Area shall be evaluated as to a project's impact upon the area's:
>
> a. Openness;
> b. Lack of Congestion;
> c. Naturalness; and,
> d. Rhythm.

The proposed project was reviewed for consistency with these criteria (defined in Exhibit 12) using the matrix outlined in Exhibit 13. The project was found to create positive effects as follows:

- Openness: Improvements to land use patterns and vegetation through incorporation of paseos and landscaping.
- Lack of Congestion: Improvements to public facilities planning and land use patterns through proposed right of way improvements and mixed use development.
- Naturalness: Improvements to public aesthetics and landscaping though building and roadway design features.
- Rhythm: Improvements to the project area in use patterns and design details through mixed use development and variations in building facades as recommended by the Historic Landmarks Commission.

As discussed earlier, the Planning Commission and Historic Landmarks Commission were generally supportive of the current proposal, acknowledging the provision of open plaza areas, paseos, and the preservation of view corridors though the project. Based on this consensus, the proposed project appears to be potentially consistent with Local Coastal Plans and Polices regarding visual resources, including the Waterfront Area Aesthetic Criteria.

1c. While the proposed project will provide additional lighting to the area, no significant impacts are anticipated. The proposed project is anticipated to provide lighting in a manner similar to that provided by surrounding land uses, and will be required to be in compliance with the SBMC Section 22.75, the City's Outdoor Lighting and Design Ordinance.

. AIR QUALITY. Could the project:		NO	YES Level of Significance
a)	Violate any air quality standard or contribute to an existing or projected air quality violation?		Short-term- Significant, avoidable Long-term- Less Than Significant
b)	Expose sensitive receptors to pollutants?		Less Than Significant
c)	Create objectionable odors?		Significant, avoidable
Is the project consistent with the County of Santa Barbara Air Quality Attainment Plan? Yes			

Discussion:

2a,b. SETTING: The Federal Clean Air Act Amendments of 1970 established National Ambient Air Quality Standards (NAAQS) for six "criteria pollutants." These include photochemical ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, particulate matter, and lead. The California Clean Air Act of 1977 created stricter California Ambient Air Quality Standards (CAAQS) for the state. Additionally, the California Air Resources Board has designated areas of the state that are in attainment or non-attainment of the CAAQS. An area is in non-attainment for a pollutant if the applicable CAAQS for that pollutant has been exceeded more than once in three years.

For environmental review purposes, the City of Santa Barbara utilizes CAAQS, as these standards are more stringent than the NAAQS. Presently, the County of Santa Barbara is in non-attainment with

July 27, 2000

Planning Commission
City of Santa Barbara
630 Garden Street
Santa Barbara, CA 93101
Facsimile (805) 897-1904

Re: Entrada de Santa Barbara and Lower State Street Improvements – Scoping Comments for Draft Environmental Impact Report

Dear Honorable Commissioners and Planning Staff,

This letter is submitted by the Environmental Defense Center (EDC), on behalf of the Citizens Planning Association of Santa Barbara County, Inc. (CPA) and the League of Women Voters of Santa Barbara (LWVSB), regarding the Notice of Preparation of a Draft Environmental Impact Report (EIR) for the above-referenced Entrada project. The purpose of this letter is 1) to provide scoping comments for the preparation of a draft EIR pursuant to the California Environmental Quality Act (CEQA), Pub. Res. Code §§ 21000 *et seq.*, 14 Cal. Code Regs. ("CEQA Guidelines") §§ 15000 *et seq.* and 2) to stress that the Planning Commission and Planning staff should resolve outstanding issues raised at the California Coastal Commission and in the Santa Barbara Superior Court.

1) The Scope of the Draft EIR

On April 27, 2000, the Santa Barbara Superior Court ruled that the Entrada project has the potential to significantly affect important scenic views, necessitating the preparation of an EIR under CEQA. See *Citizens Planning Association of Santa Barbara County, Inc., et al. v. City of Santa Barbara, et al.*, Santa Barbara Superior Court Case No. 232741. In addition to setting aside the negative declaration (ND) with respect to views and ordering the preparation of an EIR, the Court set aside the approval of the Entrada project. As a result, the City must also assess any new information since the certification of the August 17, 1999 environmental review document and prepare an environmental review document on the new information, accordingly.

EXHIBIT F

906 Garden Street
Santa Barbara, CA 93101
Phone (805) 963-1622
FAX (805) 962-3152

2021 Sperry Avenue, Suite 18
Ventura, CA 93003
Phone (805) 677-2570
FAX (805) 677-2577

864 Osos Street, Suite A
San Luis Obispo, CA 93401
Phone (805) 781-9932
FAX (805) 781-9384

A) Project Description and Environmental Baseline

First, the draft EIR must include a complete project description which provides enough detail for the public, experts and decision-makers to understand the project's potential adverse impact on views. CEQA Guidelines § 15378(a). A complete project description includes the full size and footprint of the proposed project and all project components on all parcels, including, for example, the demolition of any buildings. CEQA requires all components of the project be evaluated in a single environmental review document, and prohibits piecemeal review of a project. CEQA Guidelines § 15165; San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (5th Dist. 1994) 27 Cal.App.4th 713 [32 Cal.Rptr.2d 704] (project description inadequate because EIR did not identify wastewater treatment plant as necessary element of project, even though EIR recognized that sewer expansion had to occur.) Therefore, the project description should be expanded to describe the height of the project, the demolition of any buildings, including those adjacent to Mission Creek at 15 West Mason Street, the clean-up of contamination on the project site, a full description of the transfer of development rights, the square footage on each parcel, delineated by one-story or two-story, and the specific traffic improvements.

The project description must be accurate and consistent throughout the EIR and should also include a statement of objectives sought by the proposed project. "A clearly written statement of the objectives will help the lead agency to develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision-makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project." CEQA Guidelines § 15124(b). As a result, the CEQA process should result in project changes reducing the severity of environmental effects. Therefore, in this case, the project description should be amended to include a statement of objectives sought by the proposed project.

Second, the draft EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) was published on June 26, 2000. CEQA Guidelines § 15125(a). The actual, existing environmental setting constitutes the "environmental baseline" upon which to measure impacts. Accordingly, the environmental baseline upon which to measure the project's impacts is the actual, existing, environmental conditions in the Waterfront area[1] today. The baseline includes, but is not limited to, views, morphology, watershed, vegetation, and all ***current*** uses. Therefore, in this case, the draft EIR must include a description of the physical environment as it exists on June 26, 2000, including, but not

[1] / For the purposes of this letter, the Waterfront area includes the area south of 101 to the Pacific Ocean and bounded by Castillo Street to the west and Garden Street to the east.

limited to, the number, height, and use of buildings in the project area, the traffic and parking conditions, the surrounding neighborhoods, the sweeping views of the foothills and mountains and of the ocean, and Mission Creek.

Third, the draft EIR shall discuss cumulative impacts of the project. CEQA Guidelines § 15130(a). So, in this case, the draft EIR should include a full discussion of cumulative impacts, including those from the development along State Street, around the Waterfront area, and along Mission Creek.

B) Impacts on Views

The draft EIR must identify and focus on the possible significant environmental impacts on aesthetics and views as a result of the Entrada project. To analyze impacts, the draft EIR must first identify the environmental baseline, including all views currently visible from the Waterfront area. These views include, but are not limited to, those of the Santa Barbara foothills (often called the Riviera), the Santa Ynez Mountains, and the Pacific Ocean. The environmental baseline consists of sweeping views and openness.

The draft EIR should then identify numerous viewpoints in the Waterfront area from which to measure impacts. Viewpoints should include, but not be limited to, those along Mason Street, Kimberly Avenue, Chapala Street, Helena Avenue, State Street, Cabrillo Boulevard, and from the residential neighborhood to the west of the project area. The EIR should include a complete analysis of all state and local laws, plans, and policies, including any community visioning processes. Consistent with all such laws, plans, and policies, all foothill, mountain and ocean views and the openness in the Waterfront area must be preserved.

Effects on views should be assessed both qualitatively, according to all State and local laws, plans, and policies, and quantitatively. Through the visioning process and the implementation of local laws, the community has identified all foothill, mountain and ocean views as important and in need of preservation. Consequently, any judgment on whether a particular view is worth preserving would be inconsistent with our local plans and policies. All views are worth preserving and in fact, must be maintained, preserved and enhanced, according to Santa Barbara's Local Coastal Plan (LCP). Accordingly, the draft EIR should also include a quantitative analysis upon which to measure impacts.

The draft EIR should then analyze a range of alternatives to the project as proposed by the applicants, Santa Barbara Beach Properties, L.P. and the City of Santa Barbara. Alternatives should include the following:

1. A one-story project which maintains all required setbacks along every property line with no modifications to permit any encroachment in any setback area, and which excludes the lower State Street improvements.

2. A combination one and two-story project with open paseos which maintains all required setbacks with no modifications to permit any encroachment in any setback area, and which excludes the lower State Street improvements.

3. A one-story project which maintains all required setbacks along every property line with no modifications to permit any encroachment in any setback area.

4. A combination one and two-story project with open paseos which maintains all required setbacks with no modifications to permit any encroachment in any setback area.

Finally, the EIR must identify a range of mitigation measures to offset any adverse impacts on views.

C) New Information

The draft EIR must identify and focus on new information which shows possible significant environmental impacts as a result of the Entrada project. Pursuant to CEQA Guidelines § 15162, the City shall prepare a subsequent EIR or ND on an adverse impact if new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the negative declaration was adopted, shows any of the following:

1. The project will have one or more significant effects not discussed in the previous ND;

2. Significant effects previously examined will be substantially more severe than shown in the previous ND;

3. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

4. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental review document would substantially reduce one or more significant effects on the

environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines § 15162(a)-(b). Also, for each area in which new information is identified, the EIR must identify the Entrada project's potential for adverse impacts and a range of alternatives and mitigation measures to reduce those impacts to a less than significant level.

For example, the Local Planning Guidance on Tsunami Response constitutes new information which was not known and could not have been known with the exercise of reasonable diligence at the time the ND was adopted. The Local Planning Guidance on Tsunami Response shows significant effects on traffic and safety which will be substantially more severe than shown in the previous ND. Therefore, the EIR should identify and assess the adverse impacts and identify project alternatives and mitigation measures to reduce those impacts.

New information regarding Mission Creek also warrants subsequent analysis in the EIR. The U.S. Army Corps of Engineers (ACOE) Mission Creek Project's selection of Alternative 12 in the EIR/EIS released in December 1999 for the project, which includes the demolition of the buildings at 15 West Mason Street (previously part of the Entrada project) and to widen Mission Creek at least 30 feet towards the Entrada project area, clearly constitutes new information which was not known and could not have been known with the exercise of reasonable diligence at the time the ND was adopted. Please refer to attached letter and exhibits regarding the Entrada Project's impacts to Mission Creek which is incorporated herein.

The selection of Alternative 12 shows significant effects on water and biological resources which were not discussed in the previous ND. In fact, at the time of the City's adoption of the previous ND on August 17, 1999, the ACOE had not chosen a preferred alternative and the City claimed that to analyze a particular alternative was too "speculative." Since that time, the selection of a preferred alternative, Alternative 12, shows significant effects not discussed in the previous ND. Therefore, the EIR should identify and assess the adverse impacts and identify project alternatives and mitigation measures to reduce those impacts.

2) Outstanding Issues To Be Resolved

On August 17, 1999, the Santa Barbara City Council approved the Entrada project. CPA and LWVSB appealed the City's issuance of a Coastal Development Permit (CDP) to the California Coastal Commission (CCC) and challenged the City's decision in Santa Barbara Superior Court.

1. The California Coastal Commission

On November 4, 1999, the CCC voted 11 to 0 to find that the City's approval of the CDP raised a substantial issue with respect to its consistency with the applicable provisions of the City's certified Local Coastal Plan (LCP) and the public access policies of the California Coastal Act, Pub. Res. Code § 30000 *et seq.*. Consequently, the Commission reviewed de novo the development proposed in the CDP. During the following six months, various Commissioners raised numerous issues and voted twice to postpone any action on the CDP pending additional review of the project. Also, contrary to the information given to the Planning Commission at the scoping hearing, the Coastal Commission staff was not "fully supportive of the project," but instead recommended approval with additional mitigation measures. On April 12, 2000, at the recommendation of Coastal Commission staff, the Commission voted to postpone the hearing in order to study how to alleviate the loss of affordable overnight accommodations in the coastal zone as a result of the Entrada project. Specifically, the Commission requested an economic study on the necessary mitigation fee given the current economic market which would be needed to replace the loss of affordable overnight accommodations in the coastal zone.

Other issues raised by one or more Commissioners include the following:

1. The suitability of time-shares rather than overnight hotel rooms;
2. The criteria and justification for the number of rooms;
3. The selection and description of special events;
4. Information on the managing unit;
5. Appropriate and legal setback the top bank of Mission Creek, taking into account the ACOE project; and
6. Traffic and parking implications on the residential neighborhood to the west of the project area.

Therefore, EDC strongly urges the City to retain an economic expert and conduct an economic study on the proper mitigation fee to replace the loss of overnight hotel accommodations in Santa Barbara's coastal zone and to resolve the other remaining issues as noted above.

B) The Litigation in Santa Barbara Superior Court

Concurrently with the appeal to the Coastal Commission, CPA and LWVSB filed a lawsuit against the City of Santa Barbara challenging the City's approval of the Entrada project. CPA and LWVSB raised six causes of action, including 1) violations of the CEQA, 2) violations of the Santa Barbara Municipal Code, 3) violations of the Santa Barbara General Plan, 4) violations of the Santa Barbara Local Coastal Plan, 5) violations

of California Planning and Zoning Law, California Coastal Act, and the Local Coastal Plan, and 6) injunctive relief. On December 3, 1999, the Court severed the first cause of action alleging violations of CEQA and ordered the CEQA claim to be tried first and separately. The Court "stayed," or put on hold, five causes of action raised in the lawsuit pending the CCC's decision. Then, on April 27, 2000, the Santa Barbara Superior Court ruled that the Entrada project has the potential to significantly affect foothill and mountain views, necessitating the preparation of an EIR. Additionally, the Superior Court set aside the approval of the Entrada project. As a result, the Coastal Commission hearing on the project is unnecessary, and the remaining causes of action are unresolved.

Since the remaining causes of action are currently unresolved, the City should make every effort to resolve the contested issues during the EIR process and to avoid additional appeals and litigation. The following is a summary of the remaining issues stayed in the litigation:

1. Incompatibility of size, bulk and scale with the residential neighborhood;
2. Adverse impacts on traffic and lack of traffic improvements in place at occupancy;
3. Less parking than required to fit needs;
4. Adverse impacts on water and biological resources in Mission Creek;
5. Incompatibility of time-share units with the Waterfront area, residential neighborhoods, and character of Santa Barbara;
6. Inconsistency with Measure E, including increased room square footage;
7. Encroachments into setbacks;
8. Overburden on existing residential neighborhoods.

Therefore, EDC strongly urges the City to resolve these outstanding issues during the process of preparing the EIR and staff report and through the public hearings on the Entrada project.

Thank you for your attention to this matter. Please call me at (805) 963-1622 if you have any questions.

Very truly yours,

Tanya Gulesserian
Staff Attorney

cc: CPA
LWVSB

Environmental Defense Center, March 22, 2001

F-1. The Santa Barbara Superior Court has determined that the previously prepared Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project except for potential impacts on public scenic views. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits. Please also see detailed responses below.

F-2. This Focused EIR is not a Subsequent Document as defined in CEQA Section 15162. The scope of the EIR has been determined by the Santa Barbara Superior Court as focusing exclusively on public views. CEQA requires additional environmental review (section 15162) only when new information is identified that would result in a previously undisclosed significant impact, or identification of a significant impact that was not previously identified as significant.

Responses to issues raised by the commentor that are not subject to further environmental review are provided below:

Tsunami Planning Issue

The commentor alleges that new information of substantial importance, which was not known at the time the Second Revision to the Initial Study was approved, regarding tsunamis and their potential to result in significant impacts must be analyzed in the EIR.

The Second Revision to the Initial Study (Pages 19 and 20) analyzed the potential for the Entrada project to result in or expose people to tsunamis and determined that no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project. The Entrada project is located at approximately 10 feet above mean sea level (MSL) and according to the City's Master Environmental Assessment maps is within the tsunami run-up area. Because the City requires buildings to be constructed to the Uniform Building Code (to withstand 100-year events) and because adequate evacuation plans are in place for the Waterfront area, no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project.

Since the preparation of the Second Revision to the Initial Study and adoption of the Entrada project's Mitigated Negative Declaration (August 1999), new information regarding tsunamis has been published. The California Office of Emergency Services has prepared tsunami inundation maps which estimate the run-up from a worst-case tsunami (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously). The California OES recognizes that its tsunami maps are not particularly useful for land planning, since the assumptions used to prepare the OES map (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously) exceed the design criteria for all development except

nuclear facilities. The California OES has also produced the Local Planning Guidance on Tsunami Response (no date). The purpose of this document is to, "...assist local governments in the initial development of a tsunami response plans and the procedures necessary to deal with a tsunami's impact on their communities."

Neither the OES tsunami inundation maps nor the document Local Planning Guidance on Tsunami Response have identified new information of substantial importance that will result in new significant environmental effects which were not discussed in the Second Revision to the Initial Study.

In addition, the report Seismic Sea Wave (Tsunami) Potential, dated March 28, 2001 prepared by Michael Hoover, Consulting Geologist-Hydrologist (see Appendix G), evaluated the effects of a locally generated tsunami resulting from a maximum earthquake. Such an earthquake (Magnitude 7.4) could cause a wave height of nine to twelve feet and result in the Entrada project experiencing minor flooding. If such an earthquake occurred at high tide (likely recurrence frequency of 600 years) it could result in the Entrada project experiencing significant flooding, but that the structures would not be destroyed and because they are proposed to be built of steel, could be used as evacuation facilities.

The Seismic Sea Wave (Tsunami) Potential also evaluated evacuation of the Waterfront relative to tsunamis. Distant source tsunamis result in relatively small (1 to 5.5 feet) waves in Santa Barbara, and lengthy warning times (usually hours) providing ample evacuation time. An earthquake locally of sufficient Magnitude to generate a significant tsunami would likely also cause collateral damage to roads, liquefaction, slope failures, bridge failures, and scattering of building debris on roadways such that evacuation from the Waterfront via automobile would be impossible. Evacuation from the Waterfront area would be via foot to higher ground (i.e. to the top of the Santa Barbara City College stadium). No change in evacuation conditions would result from reducing the number of vehicle traffic lanes on State Street. Due to the low probability of tsunami occurrences and limited scope of the project, no significant impact would result from exposure of persons to tsunami risk.

Mission Creek

The commentor asserts that there is new information of substantial importance, which was not known at the time the Second Revision to the Initial Study was approved, regarding the proposed Lower Mission Creek Flood Control Project and its potential, together with the Entrada project, to result in significant impacts on the Mission Creek environment, thereby impacting the water environment, riparian habitat and sensitive species within the creek.

The Second Revision to the Initial Study (Pages 21 and 44) indicated that the proposed project will not have a significant impact on the natural communities or wetland habitats within Mission Creek, nor will changes to the drainage flow of Mission Creek occur as a result of the proposed project.

At the time the Second Revision to the Initial Study was prepared and approved (August 1999), the preferred plan for the proposed Lower Mission Creek Flood Control Project was not known. However, in anticipation of changes to the Mission Creek stream channel, in conjunction with the proposed Lower Mission Creek Flood Control Project, the Entrada de Santa Barbara Conditions of Approval contained in City Council Resolution No. 99-098 contain Condition G.13 which states:

G. Prior to issuance of demolition, grading or building permit for the proposed project:

13. The applicant shall review construction requirements with the Public Works Department to ensure that the development on Site A is consistent with approved plans for the improvement of Mission Creek at the time of project construction on Site A to the extent feasible. The Owner shall make all feasible changes to the plans as reasonably required by the Public Works Department. Costs for plan revisions shall be borne by the applicant.

In September 2000, the US Army Corps of Engineers released the Feasibility Report, together proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project. The recommended plan according to the Feasibility Report is Alternative 12. Appendix H shows Area A in this alternative as previously approved with the existing alignment and the proposed Alternative 12 alignment of Lower Mission Creek superimposed. As indicated on this Mission Creek Alignment alternative, if the Alternative 12 alignment of Lower Mission Creek is ultimately approved the proposed buildings on Area A (as previously approved) would be at the top-of-bank of Lower Mission Creek. However, as also indicated on this plan, Alternative 12 includes the demolition of buildings adjacent to the portion of the building on Area A closest to Mission Creek. In addition, a habitat restoration area is proposed between the west elevation of the building on Area A and the proposed top-of-bank of the Lower Mission Creek. According to the proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project, these components of Alternative 12 were found to offset any impact resulting from the building on Area A encroaching within the required 25 foot setback from the top-of-bank of Lower Mission Creek.

The Lower Mission Creek Flood Control Project has yet to be considered for approval, its final design has not been determined and remains unknown at this time. In addition, the staff recommendation for consideration of the Entrada project on its land use and design merits would include a condition similar to, if not exactly the same wording as, City Council Resolution No. 99-098, Condition G.13 described above.

Therefore, while the Lower Mission Creek Flood Control Project proposed alignment has been further refined since preparation of the Second Revision to the Initial Study, this additional information will not result in new or substantially more severe significant environmental effects which were not discussed in the Second Revision to the Initial Study.

Project Trip Generation

The traffic report prepared by Kaku Associates in 1998 used the City of Santa Barbara's approved methodology for investigating the impacts of a new project when that new project would replace existing buildings/land uses on the site. That methodology is as follows:

a. The size and zoning of the existing on-site land uses are summarized. If the on-site buildings are vacant, but could be occupied again without any new discretionary approval from the City, then the building size and land use are added to the on-site total for existing conditions.

b. The trip generation for the existing on-site buildings/land uses is calculated using a reference source approved by the City. In most cases, the Institute of Transportation Engineers *Trip Generation Manual, Sixth Edition* will be used as the City's reference of choice.

c. The same trip generation reference will be used to calculate the trip generation of the proposed land uses on site.

d. In some cases, the trip generation rates found in the *Trip Generation Manual* will be adjusted to reflect conditions at the site. Any adjustments to the standard trip generation rates must be approved by the City.

e. The two trip generation studies described above are compared and the difference in trips is considered to be the net trip generation effect of the proposed project. The traffic impacts of the proposed project are identified based on this net trip generation.

The trip generation comparison included in the Urban Crossroads letter ignores two factors in the above methodology – the definition of on-site land uses and trip reductions.

On-Site Land Uses

The City assumes that if a building can be re-occupied without any additional discretionary approval from the City, it should be counted as "existing square footage," even if it happens to be temporarily vacant at the time of the study. CEQA case law was presented during the Planning Commission and City Council deliberations on this project that supported the City's interpretation of the definition of "existing on-site land use."

Thus the Urban Crossroads study is incorrect in its definition of the amount of land use on site today. Therefore, the Urban Crossroads study underestimates the trip generation of the existing on-site land uses.

Trip Reductions

The trip generation rates used in the Urban Crossroads traffic study were based on the data found in the *Trip Generation Manual* as required by the City. The *Trip Generation Manual* represents a collection of trip rates from across the United States – most of which reflect suburban, single-use projects that experience little transit or walk-in patronage. Indeed, the data collected for the *Trip Generation Manual* is intended to document the peak automobile generation of each individual land use and, typically, the suburban projects do just that.

However, many projects in Santa Barbara do not behave as single-use suburban developments, and therefore it is appropriate and more accurate to adjust the trip generation rates accordingly. For example, commercial projects along the oceanfront have traditionally received a 25 percent reduction from suburban rates to reflect the pedestrian nature of the State Street/Cabrillo Boulevard corridors.

Visitor-serving projects along State Street and Cabrillo Boulevard corridors are well served by transit and shuttle service, and it is appropriate to assume that the well-utilized shuttle system would serve hotel and retail land uses along these corridors. Again, the suburban trip generation rates found in the *Trip Generation Manual* would not reflect the service offered by the State Street shuttle.

Finally, the Urban Land Institute in its publication *Shared Parking* documented that visitors to a mixed-use project tend to visit more than one land use in the project during a single visit. This capture of multiple trips tends to reduce both the number of trips and the parking requirements of mixed-use projects. Multiple visits in the range of 20-70 percent were found in the ULI study.

The first two trip reduction factors above (walk-in and shuttle) would apply to both the existing and proposed land uses while the third (mixed-use project) would only apply to the proposed project.

The trip reductions applied by Kaku Associates were approved by the City Transportation Division staff prior to their use in the study. They are reasonable and conservative. No additional trip reduction was taken for the mixed-use aspect of the project, and the walk-in and transit reductions are consistent with reductions approved by the City for other projects in the area.

The Urban Crossroads analysis used the incorrect definition of existing on-site land uses and it failed to take into account legitimate and well-documented trip reductions. Therefore, the Urban Crossroads analysis incorrectly underestimates the number of existing trips and overestimates the number of trips from the new project. The City believes that the trip generation estimate in the Kaku Associates report reflects a more accurate estimate of the net trip generation of the proposed

project. Given this, we do not agree with the Urban Crossroads conclusion that the project would impact the intersection of Garden Street/US 101 northbound Ramp.

Traffic Signals Warrants

We agree with the statements in the Urban Crossroads letter regarding traffic signal warrants. The City believes that the traffic and pedestrian activity generated by the new project would warrant a new traffic signal at Mason Street/State Street, and therefore a warrant analysis was not required.

When the warrant is met, the signal (and any other warranted signal on Cabrillo Boulevard) would be installed consistent with the City's ability to fund the installation. In the case of the proposed project, the Mason Street/State Street signalization would be a recommended condition of the project and therefore would be installed consistent with warrants.

Pedestrian Crossings of State and Mason Streets

We concur with the comments of Urban Crossroads. Additional pedestrian crossings of both State Street and Mason Street would be generated by the project and the intersection and mid-block crosswalks proposed by the project are intended to accommodate the increased activity. As pointed out by Urban Crossroads, the crosswalks are typical treatments in urban areas.

F-3. The comment does not provide specific concerns regarding the adequacy of the EIR analysis. Responses to specific concerns are provided below.

F-4. CEQA Section 15125(d) requires that the EIR "discuss any inconsistencies between the proposed project and applicable general plans and regional plans..." The section states that, " where individual projects would run counter to the efforts identified as desirable or approved by agencies in the regional plans, the Lead Agency should address the inconsistency between the project plans and the regional plans. As a result of this analysis, Lead Agencies (such as the City) may be able to find ways to modify the project to reduce the inconsistency." The analysis of project consistency with applicable State and City plans and policies contained in the Revised Second Mitigated Negative Declaration adopted by the City Planning Commission and on appeal by the City Council was found to be legally adequate and approved by the Santa Barbara Superior Court. Due to these unique circumstances, this EIR goes beyond the usual initial staff assessment of potential consistency or inconsistency and reports the actual policy consistency for this project previously made by the City regarding plans and policies related to public scenic views. There is nothing in the EIR analysis that changes this earlier assessment. However, as noted in the introduction to Chapter 3.0, Introduction of this EIR, "These decisionmakers will review this project again and are free to re-evaluate this consistency determination." It is the role of elected and appointed decisionmakers to interpret and apply adopted state and City plans and policy language. The fact that the commentor differs

with City staff, Historic Landmarks Commission, PC and CC on interpretation and application of state and City plans and policies in this matter is acknowledged and will be forwarded for decisionmaker consideration.

F-5. The Entrada project's impacts on public scenic views would be adverse, but less than significant. This would not result in a project inconsistency with City plans and policies. No significantly adverse impacts on public views were identified in this EIR. Therefore, no analysis of project alternatives is required to minimize impacts on public scenic views. Regardless of the EIR impact conclusions, City decisionmakers may determine that additional project modifications are needed to find the proposal consistent with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and the City's Local Coastal Program policies. Please see the Executive Summary, Areas of Known Controversy and Issues to be Resolved. Please see response to comment F-4 regarding the EIR's evaluation of project consistency with approved plans and policies, and subsequent Lead Agency decisionmaker determinations.

F-6. The EIR scope of analysis is limited to public views. The plans and policy analysis only analyzes plans and policy consistency with public view plans and policies adopted for protection of the environment. Responses to specific concerns are provided below.

F-7. As stated in section 3.2, California Coastal Act, in approving the Second Revised Mitigated Negative Declaration for the Entrada project, the City Planning Commission and the City Council found the project consistent with California Coastal Act Section 30251. Please see response to comment F-4.

This EIR evaluates public view impacts within relevant coastal areas, evaluates utility lines as a component of visual conditions, and describes relevant views of the Santa Ynez Mountains and foothills.

F-8. As stated in section 3.3, Local Coastal Plan, in approving the Second Revised Mitigated Negative Declaration for the Entrada project, the City Planning Commission and the City Council found the project consistent with LCP policies 9.1 and 9.3, WAAC and WADG. Please see response to comment F-4 and F-7.

F-9. As stated in section 3.4, in approving the Second Revised MND, the City Planning Commission and the City Council found the project consistent with applicable public view protection goals, the CCA, LCP, WADG, WAAC, and policies contained in General Plan Conservation Element Policy 3.0 and Scenic Highways Element, and Visioning Report Theme IA, and applicable Action Steps and Implementing Options and this approval was validated by a Superior Court judgment. Please see response to comment F-4 and F-7. The findings of the EIR are consistent with determinations of proposed project consistency with state and City plans and policy of the Second Revised MND. Policy 3.0 does not refer to all views from lower elevations of the City. It refers to scenic view corridors in lower elevations of the City.

F-10. Please see response to comment F-8. The Planning Commission and City Council previously found the Entrada project consistent with LCP Policy 9.1. The detailed analysis in the EIR of public view impacts also provides a further basis for finding consistency with LCP Policy 9.1, the CCA, WADG, and WAAC.

F-11. The EIR did not identify any new significant, adverse impacts on public scenic views. Please see response to comment F-7.

F-12. Please see response to comment F-8. The Draft EIR provided a description of relevant existing views in accordance with CEQA baseline requirements. The EIR analysis included consideration of the LCP visual resources inventory (see Figure C-1). The commentor's opinions will be forwarded to the decisionmakers for their consideration.

F-13. Please see response to comment F-4. The EIR analysis included consideration of vegetation. The analysis supports a conclusion of project consistency with the City Municipal Code.

F-14. The EIR provides a consistent and objective analysis of public view impacts of the project. The analysis includes identification of impact assessment criteria and methodically explained application of the criteria in evaluating project impacts. Responses to specific concerns are provided below.

F-15. Responses to specific concerns about view analysis are provided below.

F-16. The concept *"important public scenic view"* is defined in section 4.0, Public View Analysis. The scenic quality of a view is one factor considered in determining the importance of a public view. Positive scenic qualities result from the visibility of important visual resources experienced within the view.

F-17. The concept of "visual expectation" is based on and defined by the description of *"visual context"* in section 4.0, Public View Analysis, as the "aesthetic expectations as described in existing plans and policies."

F-18. Please see section 4.3.13, The View/View Corridor is Experienced From a Heavily Visited Public Viewpoint. The term "heavily visited viewing area" is defined therein. The criterion appropriately helps to define a potentially significant impact on public views.

F-19. Existing plans and policies reflect "community values" regarding important public scenic views. The proposed variable "sensitivity" is not subject to description or relative weighting in any meaningful or useful manner. The "sensitivity" of the public to impacts on visual resources is one of complete personal subjectivity and in the view of the Lead Agency, does not assist in reasonably determining values of impact significance.

F-20. The comment does not provide specific concerns regarding the adequacy of the EIR analysis. Responses to specific concerns are provided below. Section 4.1 describes the existing setting (baseline condition) for the Waterfront area, and more specifically, the area of the proposed Entrada project.

F-21. The existing setting and assessment of impacts on visual resources in this EIR is based on a nexus with City plans and policies. The infinite number of visual resources within the view of the proposed project is not required to be categorized. Those that are outside of the potential view of the project, such as the Santa Barbara Mesa, are not relevant to the EIR analysis of this specific project. The EIR has focused on several broad categories of visual resources that are defined in existing City plans and policies. Existing plans and policies reflect "community values" regarding important public scenic views.

F-22. The selection of the 19 different viewpoint used to illustrate potential project impacts on scenic public views is discussed in section 4.4.1., Photographic Simulations and View Angle Analysis. The viewpoints were selected to be representative of a reasonable range of visual conditions in the vicinity of the project. They were not selected to only illustrate the potential view blockage, but instead provide a continuum of the visual experience a person might have when traveling along Cabrillo Boulevard and the Waterfront, and along lower State Street. Additional viewpoints (e.g. at Mission Creek) were added in response to NOP comments. The analysis also provides a methodical description of the criteria and basis for conclusions about impact significance levels. The commentor's opinion in disagreement with the analytic methods and conclusions will be forwarded for City decisionmaker consideration.

F-23. The DEIR states that the lower State Street area provides "abundant" views of the Santa Ynez Mountains. But, it also demonstrates via "existing condition" photographs for views 7-10 that other views of the Santa Ynez Mountains are not generally expansive, and that numerous intrusions exist.

F-24. The description of the visual resources' existing setting appropriately includes the extent to which development has compromised the quality of the scenic visual resources experienced from viewpoints adjacent to the proposed Entrada site. Without this discussion, there is a lack of qualitative data used to weigh the relative value of the existing public scenic view.

F-25. The EIR does employ use of descriptive terms identified in the comment. For example, please see section 4.4.3 View 2: Looking Up State Street From Dolphin Fountain, where View 2 is characterized: "From this viewpoint, the ridgeline of the Santa Ynez Mountains is nearly *continuous*, interrupted only by street palm trees and a lamp post (italics added in this response)." It accurately describes the existing setting. The DEIR states that the lower State Street area provides "abundant" views of the Santa Ynez Mountains. But, it also demonstrates via "existing condition" photographs for views 7-10 that views of the Santa Ynez Mountains are not generally expansive, and that numerous intrusions exist.

F-26. Neither the EIR nor the commentor identifies new evidence of significant adverse impacts on important public scenic views. Although the EIR has provided more detailed analysis and evaluated the impact of the project on additional views from along lower State Street, all impacts on important public scenic views would be adverse, but less than significant. The EIR is not inconsistent with guidance provided in the LCP regarding the aesthetic value of utility poles. The LCP states (page 3-121) that utility poles have a "negative" aesthetic value. As stated in section 3.3, Local Coastal Plan, in approving the Second Revised Mitigated Negative Declaration for the Entrada project, the City Planning Commission and the City Council found the project consistent with LCP policies 9.1 and 9.3, WAAC and WADG. Also, please see response to comment F-4 and F-7.

F-27. Responses to specific concerns regarding methodology are provided below.

F-28. The comment incorrectly characterizes CEQA requirements for developing thresholds of significance. Section 15064.7 does not require that jurisdictions adopt thresholds of significance for visual aesthetic impacts. It states that a "public agency is encouraged to develop and publish thresholds of significance." If they are "to be adopted for general use," they must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence." The City does not have a separately adopted threshold of significance for visual aesthetics, but, as explained in the DEIR, uses the State CEQA Guidelines and City visual policies to inform the analysis. The evaluation criteria used in this focused EIR are entirely consistent with those used in the adopted Mitigated Negative Declaration for the Entrada project. The EIR provided expanded explanation for greater clarification. The EIR evaluation criteria are consistent with guidance provided in CEQA Guidelines Section 15064 and Appendix G, Environmental Checklist Form. This consistency includes the following statements.

From Appendix G:

"Would the project:

a) Have a **substantial** adverse effect on a scenic vista?
b) **Substantially** damage scenic resources? and
c) **Substantially** degrade the existing visual character or quality of the site and its surroundings?
d) Create a new source of **substantial** light or glare which would adversely affect day or nighttime views in the area?" [emphasis added]

From this EIR:

The proposed project would represent a significant adverse impact to an important public scenic view if it would:

- Conflict with the applicable vista protection standards, scenic resource protection requirements, or design criteria of the City, or if it would alter or obstruct existing public viewsheds from or across the project site, including scenic features associated with designated scenic highways, by:

  1. Substantially degrading an important public scenic view;
  2. Substantially blocking an important public scenic view corridor; or
  3. Substantially impairing the visual context of the Waterfront area.

The evaluation criteria are also consistent with the City Initial Study checklist questions. They are not new criteria or thresholds. They are the same criteria used for all other City projects. No separate public review process is required. These examples clearly indicate that the thresholds in section 4.3.2.1, Impact Significance Criteria, are consistent with the guidance provided in CEQA.

F-29. Please see response to comments F-4 and F-5. The commentor has misstated the referenced CEQA guideline section. However, the EIR analysis identified no project non-compliance with policies, standards, or thresholds. There would be no impact significance determined on this basis.

F-30. Please see response to F-28. No new "thresholds" were used. The same qualitative evaluation criteria have used and applied in the EIR analysis.

F-31. The analytic methodology outlined in section 4.3.2.1 for determining potential project impacts on public scenic views is the standard City methodology, and is completely consistent and supported by City plans and policies as described and used in the Second Revised MND. The methodology provides more detailed explanation to clarify the general criteria stated in the MND. The criteria identified in this section are based directly on illustrations in the City's Local Coast Program Visual Resources Map (see Appendix C), and text from LCP Policy 9.1 (see section 3.2), Waterfront Area Aesthetic Criteria for New Development Assessment (see section 3.3), and the Waterfront Area Design Guidelines (see section 3.3). The methodology criteria reflect City adopted plans and policies related to the protection of public scenic views. The variables of magnitude, intactness, and distinctiveness are described in section 4.3.1.2, are based on national planning organization concepts.

F-32. Please see response to comment F-28 and F-31. The evaluation criteria are completely consistent with guidance provided in CEQA and City adopted plans and policies related to the protection of public scenic views.

F-33. Please see response to comments F-28, F-30, and F-31. The thresholds used in the EIR are more detailed but consistent with those used in the previous Second Revised MND. They are also consistent with the general MND standards, CEQA, and state and City plans and policies. The thresholds of significance used in the Second Revised MND were developed for that

Waterfront area project specifically. The thresholds used in the EIR are consistent and provide additional clarification, and do not represent a deviation from the Second Revised MND threshold.

F-34. The EIR analysis of potential impacts to important public scenic views was based on 19 different viewpoints (please see section 4.4.1, Photographic Simulations and View Angle Analysis). The viewpoints were selected to be representative of a reasonable range of visual conditions in the vicinity of the project. They were not selected to only illustrate the potential view blockage, but instead provide a continuum of the visual experience a person might have when traveling along Cabrillo Boulevard and the Waterfront, and along lower State Street. Additional viewpoints (e.g. at Mission Creek) were added in response to NOP comments. The EIR analysis provides substantive detail on the methodological description of the criteria and basis for conclusions about impact significance levels. The commentor's opinion in disagreement with the analytic conclusions will be forwarded for City decisionmaker consideration.

F-35. The magnitude, intactness and distinctiveness are relevant aspects of a visual resource's existing setting and are defined in section 4.3.1.2 of the EIR. Please see response to comment F-31. The potential project impact on public scenic views is evaluated by the change that a project would have on the existing setting (baseline), as defined in CEQA Section 15126.2.

F-36. The view angle analysis prepared by Penfield & Smith was focused on the potential effects a one-story structure would have on mountain views as experienced from views on the sidewalk along lower State Street across from the Entrada project site (please see section 4.4.1., View Angle Analysis). The photographic support for this analysis is provided in Figure 4-14, View 7. One-story structures are eliminated from consideration in the cumulative impact analysis as "intervening topography and existing structural development, landscaping, or other urban intrusions of a particular field of view at lower elevations" would reasonably obscure the effects a single story structure would contribute to cumulative blockage of important public scenic views of the Santa Ynez Mountains or the Waterfront. Please see section 4.6, Cumulative Impacts.

F-37. The analysis used in this EIR is qualitative in nature. CEQA does not require a qualitative weighting methodology for public view impact analysis. The EIR provides a comparative analysis of important scenic views among the different representative viewpoints selected for analysis. Where comparisons are made between views, the EIR describes the basis for the conclusion. For example, View 5 is determined to be less valuable as similar views from other Waterfront viewpoints (i.e., Views Nos. 2-4). The EIR explains that the view of the Santa Ynez Mountains and the shoreline that can be viewed by looking to the east (as shown in View 6a), and of Stearns Wharf by looking to the south and west, are important. The view of the Santa Ynez Mountains ridgeline as shown in View 5 is less important, in that numerous intrusions (i.e., existing buildings on State Street, the Bekins Storage building, and existing palm trees) reduce the intactness and scenic quality of the existing view. Please see response to comment F-35 for a discussion of the importance of the accurately characterizing the existing setting.

F-38. The EIR analysis does not introduce new criteria; it explains factors considered in assessing public view impacts. The impact assessment of View 2 involves evaluation of the existing setting, including whether the view is currently intact. This is described as the extent to which the view is interrupted by existing structures, street palm trees, and streetlights. The project impact is in part a function of the incremental change to the intactness or integrity of the view (please see response to comment F-35). This analysis identifies that the change in the integrity of the view would not be substantial, due to the existing intrusions that already affect its scenic quality. The "visual context" of the Waterfront area is defined in the last significance criteria, footnote 3. in section 4.3.2.1. In this case, the visual context of View 2 includes the ability to experience the Waterfront from this viewpoint by looking to the south. The visual expectations as identified in existing plans and policies refer to Local Coastal Plan policies that define existing visual characteristics of the Waterfront (please see section 3.3, Local Coastal Plan). For example the Waterfront Area Aesthetic Criteria for New Development Assessment states, "Views to the foothills and mountains are still largely unimpeded by structures; in particular, the views from Stearns Wharf, Chase Palm Park, and East Beach offer unparalleled beauty." "Views are the most important dimension of naturalness. These views are to the ocean, other points along the Waterfront, and to the foothills and mountains. The contrast between the sweep of the coastline and the sweep of the mountains is especially dramatic and heightened by the linear elements of Chase Palm Park and Cabrillo Boulevard." The extent to which the views analyzed in the EIR are consistent with these characteristics is used to determine the relative importance of its public scenic view quality. View 2 has less of this quality than other views readily experienced from this general location by looking to the south. The visual expectation of View 2 is not consistent with these criteria.

The analysis of View 2 addresses each of the three criteria identified in Step 2. Degradation of the existing view would not be substantial relative to existing intrusions and the lack of integrity. Blockage of views would not be substantial, as views of the ridgelines would be maintained to the north and northeast. Consequently, the visual context of the view would not be substantially impaired, as described in the preceding paragraph.

F-39. Please see response to comment F-24, F-36, and F-38. The project's impact on the important public scenic view is not substantial, as defined and explained in the EIR. The cumulative impact analysis evaluates a completely different context than that exclusively facing the Entrada project from across lower State Street. The palm trees along lower State Street are not associated with the Waterfront. The comment refers to those palm trees along Chase Palm Park and Cabrillo Boulevard.

F-40. The impact assessment describes the extent to which the proposed project would reflect a change to the existing setting. This is related to the determination of substantial degradation, blockage, and impairment of the Waterfront visual context. Please see response to comment F-24. The potential impact is defined such that the determination of a "substantial change" can be illustrated.

F-41. The EIR correctly evaluates the change to the existing visual setting. Figure 4-10. View 3 Proposed Condition shows that none of the Santa Ynez Mountain ridgeline would be obstructed from this viewpoint. Some views of the foothills would be obstructed in areas currently affected by the Bekins Building and the streetlight. The existing foothill views from Viewpoint 4 are very limited due to the Californian Hotel and the Eladio's Restaurant improvements. The EIR correctly identifies that additional blockage would not be substantial. No additional blockage of the Santa Ynez Mountain ridgeline would occur. The comment suggests that any amount of additional view change must be considered significant. There is no basis for this standard in CEQA or in City environmental impact guidelines or plans and policies. La Cumbre Peak, Cathedral Peak, Arroyo Burro, and San Marcos Pass are not referenced in *any* existing City or state plans or policies as important public/visual resources, or as specifically requiring complete view protection from all viewpoints.

F-42. Please see response to comment F-37, F-38, and F-40. Discussion of View 5 impacts has been clarified to provide additional explanation of the lack of substantial view degradation, blockage, or impairment.

F-43. La Cumbre Peak, Cathedral Peak, Arroyo Burro, and San Marcos Pass are not referenced in any existing City or state plans or policies as important public/visual resources, or as specifically requiring complete view protection from all viewpoints. Please see response to comment F-37. The Project Impact Assessment in section 4.4.7, View 6, does state that the view has abundant views of the Santa Ynez Mountains. The section has been revised to provide additional explanation of the view's lack of distinctiveness, and resulting absence of substantial view degradation, blockage, or impairment. The difference between View 5 and 6 is that with the former view, expanses of the Santa Ynez Mountain ridgeline are compromised and interrupted to a greater extent by existing commercial structures. The View 6 would not be totally blocked by the proposed project, as seen in Figure 4-13, View 6 Proposed Condition. More importantly, portions of the view that would be blocked do not provide abundant contrast between sweeping views of the coastline and the sweeping views of the Santa Ynez Mountains. This is therefore not a substantial degradation of an important public scenic view.

F-44. The comment does not recognize the importance of public scenic views that provide abundant contrast between sweeping views of the coastline and the sweeping views of the Santa Ynez Mountains. An individual does not experience this type of view by looking southward, unlike Views 6/6A and View 5. The EIR acknowledges that the View 7 is a view corridor with views of the Santa Ynez Mountains, and therefore represents an important visual resource. The text points out, however, that this is not a distinctive, or unique view along lower State Street. The text of section 4.4.8, View 7, has been revised to clarify these points. The text identifies that the reduction in the view corridor width would not *substantially* degrade the important public scenic view. The view blockage would be adverse, but not substantially so, as the corridor would be maintained, and the Santa Ynez Mountain ridgeline would continue to be visible. Therefore, the important view corridor quality would be maintained. The text has been revised to provide clarification regarding the lack of substantial degradation, blockage, or impairment of the public scenic view.

F-45. Please see response to comment F-44. The reduction in the width of the existing view corridor would not represent a *substantial* degradation, blockage, or impairment of the public scenic view. The comment suggests that any amount of additional view degradation, blockage, or impairment must be considered a significant impact. There is no basis for this standard in CEQA or state or City plans and policies.

F-46. The variables cited in the comment, including intactness, and the extent of visitation from a public viewpoint, are introduced and described in section 4.3.1.2 and 4.3.1.3 and do not constitute "new" criteria. Please see response to comment F-38 for a discussion of views capable of "the contrast between the sweep of the coastline and the sweep of the mountains," a criteria of scenic views based in City policy. The text of section 4.4.11 has been revised to clarify the nature of the views' scenic quality. Please see response to comment F-36 addressing the relevance of the view angle analysis. The EIR clearly states that View 10, 10a, and 10b are not important public scenic views. Therefore, the extent to which the views would be impacted by the proposed Entrada project is irrelevant to the significance of the impact. Section 4.5.2 explains that the panoramic contextual view was provided to present a broader field of view analysis that replicates the totality of the visual experience as one travels up and down lower State Street past this viewpoint.

F-47. The comment does not demonstrate a nexus between the discussion of View 12 and View 10. Both View 10 and View 12 contain views of the Santa Ynez Mountains, identified as important visual resources. The views are not, however, important public scenic views as defined by the significance criteria in 4.3. Therefore, the project would not have a substantial affect on an important public scenic views based on view changes from these viewpoints.

F-48. Please see response to comment F-24 regarding the assessment of the existing setting. The commentor apparently confuses the street trees along lower State Street, which are not considered important visual resources in City plans and policies, with the palm trees aligning Cabrillo Boulevard. These latter palm trees are illustrated in Figure 4-3, and discussed in section 4.1.1.1 as integral visual components of the Waterfront area. The comment does not take into consideration the intactness of the existing setting, as discussed above. Open sky is not defined as an important visual resource in City plans and policies regarding view protection. Incorporation of View 19 is consistent with City policy guidance described in section 3.4, including the Downtown /Waterfront Santa Barbara *A Tradition in Progress*, Final Report and Recommendations, Action Step 3. As discussed in response to comment F-41, the EIR correctly identifies that additional blockage in View 11, for example, would not be substantial. The comment suggests that any amount of additional view degradation, blockage, or impairment must be considered significant. There is no basis for this standard in CEQA or state or City plans and policies.

F-49. The qualitative analysis of visual resources, as supported by the use of impact significance criteria consistent with CEQA and state or City plans and policies, identifies that no substantial adverse impacts on important public scenic views would occur with project implementation.

F-50. The comment does not provide specific concerns or evidence regarding the adequacy of the EIR analysis. Please see section 4.6 for a complete discussion of cumulative impacts as stated in CEQA Section, 15355, 15130(a)(1) and 15064(i)(5).

F-51. The comment does not provide specific citations to support the concerns regarding the adequacy of the EIR analysis. All project locations were mapped in Chapter 4.

F-52. Project effects on views that are not important public scenic views would not have the potential to incrementally contribute with other probable future projects to cause a significant cumulative impact on important public scenic view corridors. The comment is unclear regarding the importance of alternative views experienced from viewpoints 8, 9, 10, and 11. The project-specific analysis indicates that these views are not distinctive. Alternative views from these viewpoints include important visual resources, but they would not be impacted by the proposed Entrada project. Therefore, the project's contribution to cumulative impacts on these alternative views would also be less than significant.

F-53. Please see response to comment F-36. The EIR in section 4.6 does discuss that cumulative development would incrementally affect views of important visual resources throughout the Waterfront area. However, significant cumulative impacts on important public scenic views would potentially only occur if the probable future projects and the proposed Entrada project could be visible from the same viewpoint. Since the projects are sufficiently distant from each other and would not be visible from the same public viewpoints, the cumulative impact impacts on important public scenic views is adverse but less than significant.

F-54. The comment confuses the important visual resources that are experienced with View 2, and the ability to see other probable future projects within that same view. The EIR demonstrates that the three pending projects capable of contributing to cumulative impacts on important public scenic views would have only adverse, but not significant effects as they would not be experienced within View 2. That is, they would individually provide adverse, but less than significant contributions to cumulative impacts, but as a combined group, they would not have a cumulatively substantial effect on an important public scenic view (View 2). Please see response to comment F-52 for a discussion of the contribution to cumulative effect from less than important public scenic views.

F-55. The discussion of cumulative impacts in Views 3 and 4 is based on the concepts discussed in response to comment F-24. The future probable projects of three stories or less would be compatible with the existing level of intactness of scenic quality identified in Views 3 and 4. Projects 16, 17, and 19 would be between 0.25 and 0.3 miles away from the viewpoints 3 and 4. The cumulative effect of these projects on views of the Santa Ynez Mountains would be minimal, and perhaps negligible. The EIR correctly states that from Viewpoint 3 and 4, future probable project No. 11 would not have any adverse contribution to cumulative impacts on important public scenic views experienced from viewpoints 3 and 4.

F-56. The EIR states that the cumulative impact in Views 5 and 6 would be adverse, but less than significant. The comment suggests that any additional blockage of existing visual resources is a *significant* impact. This is not a reasonable standard as defined by CEQA. The future probable projects would not represent a cumulatively substantial impact on important public scenic views, as the obstruction of lower elevations of the Santa Ynez Mountains would be dispersed over space, over 500 feet apart.

F-57. Please refer to Figure 4-7, in section 4.4.1. View 7 is south of Mason Street, and mid-block between Cabrillo Boulevard. Future project 17 is at 111 Santa Barbara Street, in the block to the north, project 18 is at 11 Garden Street, to the south, and project is at 130 Garden Street, in the block to the north. None of the future probable projects would be visible within the View 7 view corridor.

F-58. Please see response to comments F-50 through F-58. The cumulative analysis is consistent with CEQA and impact significance criteria for evaluating the proposed Entrada project's contribution to cumulative impacts on important public scenic views.

F-59. Under CEQA, project alternatives, besides the No-Project alternative, are required only for the purpose of identifying whether there are feasible alternatives that could reduce any significant project impacts. Since no significant impacts were identified in the EIR, no other alternatives in addition to the No Project alternative are required under CEQA. The commentor's speculative interpretation of notes on public scoping comments has no basis in fact. As required under CEQA, a determination of alternatives analysis in the EIR was based on the results of the project impact analysis.

F-60. Please see response to comment F-59. In addition, mitigation measures are only required to lessen or reduce significant impacts. The EIR concludes, based on substantial evidence of 19 separate viewpoint analysis and application of clear and appropriate analytical methodology, that the Entrada project would not result in significant impacts on important public scenic views, either on a project-specific basis or cumulatively.

F-61. The Areas of Known Controversy and Issues to be Resolved address land use and planning considerations beyond just the environmental impacts identified under CEQA. The issues will be considered by decisionmakers and City staff during future public hearings and on the land use merits of the project. The EIR provides facts to support decisionmaker findings pertaining to public view impacts, but does not preclude the Planning Commission or the City Council from additional project considerations pertaining to other project design and compatibility issues.

F-62. This comment will be forwarded to the decisionmakers for their consideration.

F-63. This comment will be forwarded to the decisionmakers for their consideration.

F-64. The City will take issues to be resolved under consideration as part of the staff report and decisionmaker public hearings on the project.

F-65. Please see response to comments on your specific concerns. As described in response to comments F-43, F-44, and F-46, the Final EIR has been revised where necessary to clarify the conclusions in the Draft EIR.

F-66. Please see response to comments on your specific concerns. The EIR is consistent with CEQA guidance for describing the existing setting. Reasonable qualitative criteria based on CEQA Appendix G, Environmental Checklist Form have been used in the Second Revised Mitigated Negative Declaration and this EIR.

F-67. Please see response to comments F-50 through F-58.

F-68. Per the State CEQA Guidelines, circulation of the FEIR is not required, as no new significant impacts or impacts that were not previously discussed in the Draft EIR have been identified during the public review period.

This page intentionally left blank.

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

March 15, 2001

Planning Commission
Santa Barbara Planning Commission
630 Garden St.
Santa Barbara, CA 93101

RE: Entrada de Santa Barbara DEIR

I have been retained by the Citizens Planning Association and the League of Women Voters to review the Entrada de Santa Barbara Project Draft Environmental Impact Report. My analysis focuses on the methodology used, the consistency with which it has been applied, and whether conclusions are supported by the analyses. I have attached my Statement of Qualifications and the methodology I have used for many years for comparison to that used in the EIR.

In reviewing the DEIR, I find the following:

G-1 • The DEIR fails to address the overarching importance of the continuum of the viewing experience for a public that moves along State Street (walking, driving, and bicycling). Doing so supports the conclusion that expected visual impacts would be significant.

G-2 • The analyses are inconsistent and convey an impression of bias. While correctly discrediting the validity of "snapshot" views, the DEIR does so only for those "snapshots" where the impact is deemed to be significant. Other "snapshot" views deemed not to be significantly impacted are accepted as valid portrayals of the impact.

• Conclusions regarding visual impacts and their significance were based on:

G-3 1. Criteria for which no thresholds for significance were established and which were internally inconsistent (by definition self-contradictory).

G-4 2. Criteria that were not systematically applied; some were used to qualify the impacts on some views as not significant, but were not used on other views where such application would have led to a conclusion of significance.

G-5 3. A subset of the criteria presented. That is, a number of criteria were listed in the section describing the methodology, but they were not actually applied.

G-6 4. Ad hoc criteria not defined or described in the methodological approach.

G-7 5. Findings for which there are no baseline data upon which to base the conclusions.

G-8 6. Simulations that appear to be accurate, but are presented in a format too small to adequately portray either the scenic features that would be blocked from view or the mass and scale of the proposed project.

G-9 • The findings are internally inconsistent and not supported by the facts presented. Using the DEIR methodology, but in a systematic manner with a consistent application of the criteria, the visual impacts should have been found to be significant.

1.0 Methodology

1.1 Existing Setting.

G-10 The existing visual setting has been not been adequately assessed such that the discussion can serve as the baseline for impact assessment. Baseline parameters should include visual character, sensitivity, and existing visual condition. Visual character is the physical setting and includes features, natural appearing or otherwise, which form the overall impression of an area. Visual character is studied as a point of reference to assess whether a given project would appear compatible with the established features of the setting or would contrast noticeably and unfavorably with them.

G-11 The visual setting also includes a "social" component: public values, goals, awareness and concern regarding visual quality. It is most usually addressed as "visual sensitivity," the relative degree of public interest in visual resources and concern over adverse changes in the quality of that resource (U.S. Department of Interior, Bureau of Land Management [BLM], 1986; U.S. Department of Agriculture, Forest Service [U.S. Forest Service], 1977). As applied to visual impact analyses, sensitivity refers to public attitudes about specific views, or interrelated views, and is key in assessing how important a visual impact may be and whether or not it represents a significant impact.

G-12 The existing visual condition of the environment is the degree to which past activities have introduced features into the view which are incongruous with, or degrade or block from view those that are established as inherent to the visual environment. Incongruity is relative to the established visual character of the affected area (natural, urban, rural).

G-13 • **Visual Character.** The DEIR fails to adequately address the existing physical setting for the views that would be most affected by the project, those from lower State Street. The eastern and western waterfront areas are described in detail and illustrated with eight photographs (Section 4.1, Public View Analysis). However, only one photograph from lower State Street is included, and it is directed toward the wharf rather than toward the project area. The views with the greatest scenic value and those that would be most affected by the project are not shown nor analyzed in the affected environment section. Existing visual corridors that include the Santa Ynez Mountains have not been inventoried, mapped, and photographically documented.

G-14 The text in this section says that "at least half of the land area of properties fronting on State Street are either ...parking lots or are unimproved.... These...provide open space and add to the overall open feeling experienced by people on foot." This text further says that the open space also provides opportunities to view the mountains and foothills. One of the visual impacts of the project is the loss of open space, which is

G-14 directly correlated with the loss of visual corridors. The acreage of open space along lower State Street frontage along State Street is among the measurable baseline data important for assessing the loss of visual corridors due to the proposed project. However, the extent of existing open space and visual corridors was not measured.

G-15 In any inventory of baseline conditions, special scenic features within potentially affected views must be specifically addressed. The primary subject of this focused DEIR is the loss of mountain views as experienced from lower State Street. However, the character and importance of La Cumbre and Cathedral Peaks are not addressed. These peaks are the signature peaks of the Santa Ynez Mountains and, as such, are major scenic landmarks. As the photo-simulations show later in the DEIR document, views of these peaks would be entirely blocked by the project relative to points along lower State Street. An informed conclusion regarding this impact cannot be reached, one recognizing the importance of the resource affected or the magnitude of the effect on that resource.

G-16
- **Visual Sensitivity.** The DEIR fails adequately to describe the several levels of public sensitivity to adverse visual impacts relative to viewing positions in the vicinity of the project. The perceptions and expectations of tourists and residents alike need to be fully assessed. The value of determining sensitivity is in focusing the later analysis on the truly important public views (also called "key" or "critical" views) and is also one factor in assessing the significance of visual impacts.

G-17 Section 4.3 of the DEIR does discuss the importance of public views, but this discussion is misplaced, is used in a conclusionary manner, is inconsistently defined, and is contradictory (See Section 1.2). It is misplaced, as noted below, because it belongs in the Existing Setting section in a section addressing Existing Visual Conditions.

G-18
- **Visual Condition (Intactness).** The DEIR uses a subjective judgement of visual condition (intactness) as a criterion for impact significance. This is an incorrect application of this attribute. A description of existing visual conditions should have been the baseline for the degree to which visual conditions will change due to the proposed project (the magnitude of the impact). For instance, to varying degrees the mountains currently are prominent in the affected views from the southwest side of State Street. After the project, these levels of "intactness" would be measurably diminished. In fact, in most cases the mountains would be completely blocked from view. Such a change would be a measurable lessening of visual condition (a perceptible reduction in visual quality) and form the basis for conclusions regarding the magnitude of the impact. Additionally, specific thresholds of existing visual conditions should have been identified for the views assessed in the DEIR, and they were not.

1.2 Visual Impact Assessment

G-19 Section 4.3 does not address key aspects of visual impact assessment methodology. Without a clearly articulated methodology, the conclusions not supportable. As noted, Sections 4.3.1 is misplaced; the analysis of view importance must be addressed in the Existing Setting section under the headings of "visual sensitivity" and "existing visual condition."

G-20
- **Impact Definition and Magnitude.** Missing from Section 4.3 is the definition of what constitutes an adverse visual impact and the analytical approach to determining the magnitude of visual impacts. See Appendix A, Definition of Visual Impacts, p. 18.

- **Photosimulation Methodology.**

The photosimulations are the basis for conclusions regarding view blockage and magnitude of visual impact. Two observations are important:

G-21
1. No systematic approach was used to select representative viewing positions. A methodology for selecting the views to be analyzed was not described. Why was the photo representing the view from the southwest corner of Mason Street and State Street taken from a point 35 feet away, a point where trees, a light post and a street sign obstruct mountain views? The view from the street corner mentioned is, in fact, uncluttered by the objects mentioned (Figure 1). Why not present in the document a transect of photos taken at set intervals along the State Street, then pick several that demonstrably represent the transect? That would have been defensibly systematic. As it is, there is the appearance of arbitrarily picking a viewing position (VP8) that justifies a finding of no significant impact. (To paraphrase the DEIR: The mountains are partially blocked, the view is therefore not intact, scenic quality is compromised, and the view therefore is unimportant. Although substantial, the visual impact is therefore not significant).

G-22
2. The images presented in the DEIR are far too small to adequately portray the visual impact of the project. Research has shown (Headley, 1984) that a 14-inch wide print of a photograph taken with a 35 mm single lens reflex camera using a normal (50 - 55 mm) lens should be held about 12.5 inches from the eye (normal reading distance) to replicate the visual impression of the simulated project. Viewing the image at a greater distance would minimize the effect, as would reducing the size of the print while retaining a 12.5-inch viewing distance. Each panoramic image in the DEIR consists of three approximately 3-inch-wide photos "spliced" together (the panoramas are 8.8 inches wide). Each was taken with a digital camera using a 55-mm lens (Ken Doud, personal communication). Therefore, each photo would have to be about 14 inches wide for proper viewing (with the eye being about 12.5 inches from the print). That would suggest that the panoramic prints would have to be about 42 inches wide. While the degree to

G-22

which mountain views would be blocked by the proposed project can assessed, the significance of that impact cannot be appreciated. The "before" views at such a small size do not adequately convey the on-site impression of the scale of the mountains, making them appear smaller and more distant than they are. Likewise, the "after" views do not convey the mass of the proposed project. Of course, poster sized prints cannot be included in the DEIR. However, such prints could have been displayed in several public facilities so that the public, not to mention those assessing the impacts, could gain a more accurate impression of the project impacts.

G-23

- **Impact Significance**. Four criteria for visual impact significance were listed, but no thresholds of significance were identified for three of them. The criteria that were identified were not applied systematically to the impact analysis, and other criteria not mentioned in the methodology crop up in the impact assessment, again not addressed in a systematic manner. One criterion for significance, a standard one for visual impact assessment, was whether or not the impact would conflict with laws, ordinances, regulations, and standards LORS (Section 4.3.2.1). If there would be a conflict, the visual impact would be significant, which presents an either-or threshold of significance.

G-24

The other three significance criteria in question are:

1. Substantial degradation of important views.
2. Substantial blocking of an important public scenic view.
3. Substantial impairment of the visual context of the Waterfront area.

Note that, while these criteria were listed as defining impact significance, they were not systematically applied to each view analyzed. Only the second criterion was used for each of the views. The impairment of visual context and degradation of views were not addressed.

G-25

Substantial Impacts. These three criteria partly hinge on determinations of whether or not there would be substantial levels of adverse change. Assessing what constitutes a "substantial" impact, though, is problematic when no criteria or thresholds are presented for that criterion.

G-26

Importance of Views. These criteria also hinge on determinations of view importance. The DEIR criteria (Section 4.3.1, p. 4-18) for view importance, a key factor in determining the significance of visual impacts, are:

1. The view/view corridor includes one or more important visual resources
2. The view/view corridor has scenic quality; and
3. The view/view corridor is experienced from a heavily visited public viewpoint.

G-27

Section 4.3.1.1, notes that "views/view corridors specifically identified as important by adopted City and state plans, policies and regulations include... views/view corridors of the...Santa Ynez Mountains from State Street...."). The criteria for importance noted above appear irrelevant given this clearly worded policy statement. Later conclusions regarding visual impacts that certain views from State Street are not important contradict the quoted statement of policy in Section 4.3.1.1.

G-28

However, regarding the three criteria for view importance, the Santa Ynez Mountains (foothills and ridge lines) are specifically listed as among important visual resources (criterion 1) and a "Major Public Transportation Corridor" is deemed to qualify as a "heavily visited public viewpoint" (Section 4.3.1.3, p. 4-19). State Street is such a transportation corridor and thus meets criterion 2, and the views of the Santa Ynez Mountains from this street are largely the focus of the DEIR. Based on these two criteria, views from State Street are important.

G-29

Given the foregoing, the determination of whether the views from State Street can be considered to be important rests on a single determination: **whether the views have scenic quality**. Three sub-criteria for answering this question are listed:

1. Magnitude (abundant and expressive).
2. Intactness.
3. Distinctiveness.

G-30

Criteria 1 is partly nonsensical and partly internally contradictory. The question is asked: How expressive or abundant is the view? What does this mean? Expressive of what? Is it singularly expressive of especially scenic resources? If so, then how can a view be both highly (singularly) expressive and also be "abundant"? Or does this criterion suggest that a view may be "expressive" by typifying views including scenic qualities (being like many other views). But, is abundance a good thing or does it make any one or several of the abundant views unimportant? Used here "abundance" is supposed to be a predictor of scenic quality in some way. It follows that if the view is but one among many, i.e. "abundant," it cannot also be singularly expressive, which is a contradiction. Another contradiction is the query: "Is the view continuous throughout several view corridors...." By definition, a view corridor is a limited, i.e., discontinuous view, enclosed laterally by fore- or middleground features.

G-31

Criterion 3, Distinctiveness, is equally nonsensically and contradictory. The question is asked: "How unique or representative of the region is the view?" Unique means one of a kind. "Representative" means representing a class of similar views in the region; i.e., the view is not unique.

G-32

Besides the confused usage of words like "expressive," "abundant" and "continuous view corridors," there is the question about how one measures degrees of these attributes. The wording suggests thresholds, such as: "how expressive or abundant is the view," "to what extent has...the view been...disturbed," and "how unique...is the

G-32 view...?" However, no analytic process is advanced for measuring abundance, extent, or uniqueness.

G-33 The discussion of Criteria 1 and 3 is mute, however, **because neither criterion is used in determinations of scenic quality. Only Criterion 2 is used: "intactness."** To what "extent" has the view been disturbed or compromised? Do "constructed materials...impose...into the backdrop of the natural setting?" There are several points to be made regarding this criterion:

G-34 1. Applying Criterion 2, no views in an urban setting are intact. The built environment in the foreground always intercedes between the viewer and the background. That would be one defining aspect of something being in the "background," of course. But apart from that fact, the question of "extent" is never addressed systematically. There are no thresholds described for "small extent," "great extent," etc. Therefore, there is no basis for assessing the existing levels of "intactness" for the affected views, let alone the changes in "intactness" that would be caused by the proposed project.

G-35 2. The use of scenic quality as a criterion for view importance is inconsistent with research that shows that there is not necessarily a correlation between standards of beauty or "intactness" and the importance of the view to the public. The public may confer visual significance on landscape components and areas that would otherwise appear unexceptional (FHWA, 1980). For example, unexceptional landscapes along tertiary roads may be particularly important to local residents (Kaplan, 1979) as undesignated open spaces.

G-36 3. As has been discussed earlier, an analysis of the importance of views in the DEIR is misplaced and belongs in the Existing Setting section. The component of view importance, termed in the DEIR as "intactness" (visual condition), is a baseline attribute key in assessing the magnitude of the visual impact, not its significance. (It is addressed in the DEIR impact section as practically the only measure of scenic quality, which is used as a qualifier of view importance, which in turn was used to define the significance of visual impacts.)

G-37 4. An additional deficiency in the DEIR is that there is an assumption that if visual quality has been adversely affected by past activities (i.e., not intact), it cannot be significantly affected by future activities. There is no widely accepted visual impact assessment methodology of which this author is aware that draws such a distinction. Such a conclusion is exactly equal to a finding that if there are so many parts per million of a pollutant in water or air, a substantial addition of more would not be significant. Past actions may have adversely affected a visual resource to one degree or another, but **a proposed project may still noticeably lessen the quality of the affected views in spite of the existing conditions.** For instance, a project-induced adverse visual impact that dominates a view that has already experienced noticeable but subordinate adverse impacts (Existing Visual Modification Class 2 changing to a Modification Class 4, [see Appendix A]),

G-37 represents a perceptible reduction in visual quality. To a moderately to highly sensitive public, that change would most likely be controversial and significant.

G-38 **Ad Hoc Criteria for Significance.** Certain criteria were used in evaluating the significance of visual impacts that were not defined or listed in Section 4.3. These include:

1. Whether the view is a "snapshot" not reflecting the range of more important views available to the viewer from the viewing position analyzed.
2. The degree to which the proposed project would be consistent with visual expectations.
3. The degree to which the project design retains or creates view corridors that offset adverse visual impacts.
4. Duration of visitors' views.

G-39 1) **Snapshot Views**. The DEIR acknowledges a substantial impact on important public scenic views from VPs 5 and 6. The impact is not significant according to the DEIR because it is only a "snapshot" and "a more important public scenic view" is available from these locations. The presence of other, "more important" views is not a criterion for significance in Section 4.3, but it is treated as such in Section 4.4, Project Setting and Impact Analysis. Also, thresholds for the availability of other views are not provided. Does the "available" view have to be within a normal range of view considering the viewer's activity (walking, bicycling, or standing), or would a person have walk or bicycle backwards or turn fully around to appreciate the "available" view? What constitutes a normal range of view when moving in a particular direction? Is it more than 90 degrees left and right of the direction in which one is moving? What if, as is the case, the compensating panorama (shown a in Figure 4-13a as View 6a) is blocked from view just 90 feet away (about 45 steps) when one is standing in across the street from Mountain Air Sports? How relevant can such an ephemeral compensating view be? Also, what distinguishes an "important" public view from a "more important" public view?

G-40 The criteria for significance in Section 4.3 are clear: a substantial impact on an important scenic view is significant. Other criteria not listed in this section cannot be defensibly applied to assessing impact significance later in the document.

G-41 Additionally, the "snapshot view" argument in the DEIR **has been inconsistently applied.** It is used in the assessment of visual impacts from VPs 5 and 6, but not for other viewing positions. In the case of these two views, they were discounted as "snapshots" not encompassing the available views from these positions. The visual impacts were described as significant relative to these specific views, but not significant in consideration of the adjacent views. However, in the analysis of impacts on other views, the snapshot argument is not applied where it could lead to a conclusion of significant impact. For instance, VP7 is about 80 feet from the intersection of Mason Street and State Street, and VP 9 is at the center of Mason

Street, about 15 feet from the southwest corner of the intersection, where VP 8 should be. Figure 1 is a view from that southwest corner, while Figure 2 is a copy of the photograph of the existing view from the actual location of VP 8, 35 feet toward the wharf from the viewing position in Figure 2. Note the lack of clutter and the expanse of mountains in the view in Figure 1, compared to Figure 2, where a street sign, street light, and foreground palm tree obscure the mountains. VPs 7, 8 and 9 are all snapshot views, all of them valid portrayals taken together, but none valid separately. Considering the views of the mountains available by turning one's head or moving just a few feet away, it is clear that the these snapshots do not fairly portray the mountain views lost to the project development, nor that the simulations fairly portray the panorama of the massing of proposed structures. Criteria, to be fairly used must be evenly applied. To do otherwise is to risk the perception of bias.

G-41

2) Visual Expectations. Section 4.3 does not mention a measure of visual expectations as a criterion for significance. It is not defined and no thresholds are provided. Whose expectations are important? Are visitor expectations of greater importance than resident expectations, and how do they differ? Referencing visual expectations in the determination of significance for the visual impacts at VPs 5, 6, and 7 requires a revision of the methodology used, a clear definition of expectations, and establishing baseline data regarding such public expectations. Otherwise, citing "expectations" gratuitously supports a finding of no significant impact.

G-42

(3) Project View Corridors. The provision in the project for view corridors is not mentioned as a criterion affecting significance. Even if it were cited, at what threshold is a new view corridor compensatory for a blocked mountain view? How much of the mountains must show through the opening? Is every part of the mountain range equal to the others? Is a limited vista of part of the range that offers no interesting ridges or rock outcroppings equal to a full view of Cathedral and La Cumbre Peaks? As is the case for "visual expectations," considering the provision of view corridors in the determination of significance for the visual impacts at VPs 5, 6, and 7 is not consistent with the methodology used, is gratuitous, and therefore must not be considered.

G-43

4) View Duration. All of the views analyzed along State Street were found to be of short duration, and such findings weighed in the consideration of the significance of visual impacts. View duration was not addressed in Section 4.3.2.1 as a factor in evaluating the significance of visual impacts, and no thresholds were established. By an extension of logic, there are an infinite number of viewing positions between the Cabrillo Blvd./State St. intersection and VP 10, each with a mathematically zero view duration. By this logic, none of the views from State Street are important. The obvious factor not addressed is that analyzing specific viewing positions to represent the visual experience while moving through an area is relevant only if the views are considered together, not separately. This issue is also addressed in the DEIR in the discussion concerning "snapshot" views. The sequence of views as one walks up State Street is a continuum of visual experience lasting several minutes, so every view along the way is important, considering duration as well as sensitivity.

G-44

2.0 Land Use and Policy Considerations

2.1 Section 30251 of California Coastal Act. " Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas...and be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

The "discussion" (p. 3-2) does not discuss the compatibility of the proposed development with the surrounding area. Regarding view protection, the "discussion" on p. 3-2, paragraph 3 is both inaccurate and irrelevant. This paragraph says that the "Entrada project may block views of the Santa Ynez mountains." The photo-simulations demonstrate that the project will definitely block views of the mountains. This blockage is dismissed with the observation that the project includes view corridors through the Sites B and C to the mountains and foothills. The Area B-State Street Elevation demonstrates such a view corridor (p. 2-9), but the Area C-State Street Elevation shows an uninterrupted mass of buildings, further illustrated with Figures 4-17a, b and c (VP 10). A glimpse of mountains is, however, retained for VP 8 as shown in Figure 4-15 looking diagonally across the Mason St.-State St. intersection through Area C. However, that "view corridor" and the one shown in Figure 4-14 (VP 7) disclose peep-hole views of nondescript parts of the mountain range. The current views seen from VPs 5, 6, 8, 9 and 10 include intermittent views of the mountains that are collectively broad and important, all of which include the La Cumbre and Cathedral Peaks, the signature peaks of the mountain range. The view corridors cannot be construed as protecting mountain views, which will nearly entirely be blocked. Therefore, the project is inconsistent with the California Coastal Act.

G-45

2.2 LCP/Waterfront Area Design Guidelines (Appendix B) p. B-1

Views/Viewshed: Policy 9.1of the LCP states that "The existing views to, from, and along the ocean and scenic coastal areas shall be protected, preserved and enhanced...." The Waterfront Area Design Guidelines were developed to assist in assessing the impacts of new development in the Waterfront Area. "Cabrillo Boulevard, running the length of the Waterfront District is a potential State Scenic Highway. State, Garden and Castillo Streets are other important arterial streets in the Waterfront area. The vistas of the...mountains from these major streets must be carefully considered, maintained and where feasible, enhanced. Maintaining appropriate building setbacks, providing view corridors...and avoiding bulky, massive structures can protect and enhance these vistas."

G-46

View Corridors. The view corridors through Areas B and C were addressed above and preserve vestiges of mountain views not compensatory for those to be lost. They neither "maintain" nor "enhance" the existing mountain views. Therefore, the project is not consistent with the Waterfront Area Design Guidelines and, by extension, LCP Policy 9.1.

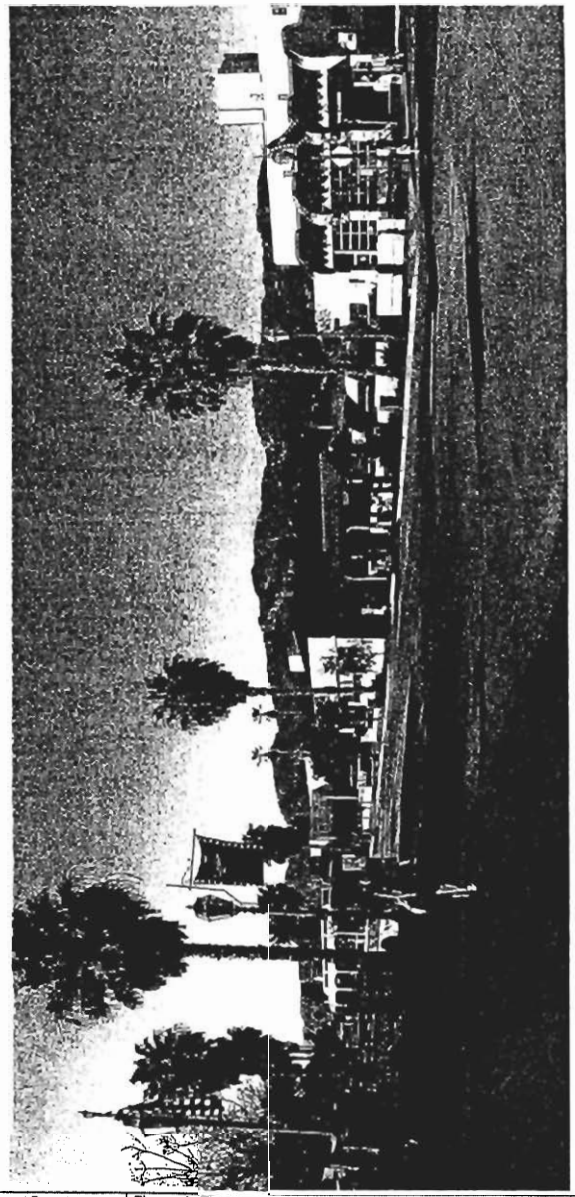
2.3 General Plan Policy 3.0. "New development shall not obstruct scenic view corridors, including those...of the upper foothills and mountains viewed respectively from the beach and lower elevations of the City."

The discussion of the project's relationship to this policy (p.3-6) dismisses as irrelevant views from State Street because "no reference is made to scenic corridors from the Entrada project site." This interpretation of the policy appears inappropriately narrow. The discussion notes that the Entrada project is in fact "located within the area that the Conservation Element refers to as, 'lower elevations of the City.'" There is nothing in the wording of Policy 3.0 that explicitly excludes views from the project site. The General Plan specifically includes an implementation strategy that requires that the Plan should be revised to be consistent with the LCP (p.3-5). Moreover, applying this policy's language to the Entrada site is consistent with the City's Waterfront Area Design Guidelines, which were formulated to assess impacts in conformance with the LCP. If mountain views from State Street in this vicinity require protection under the LCP, that policy is incorporated into the General Plan Conservation Element 3.0.

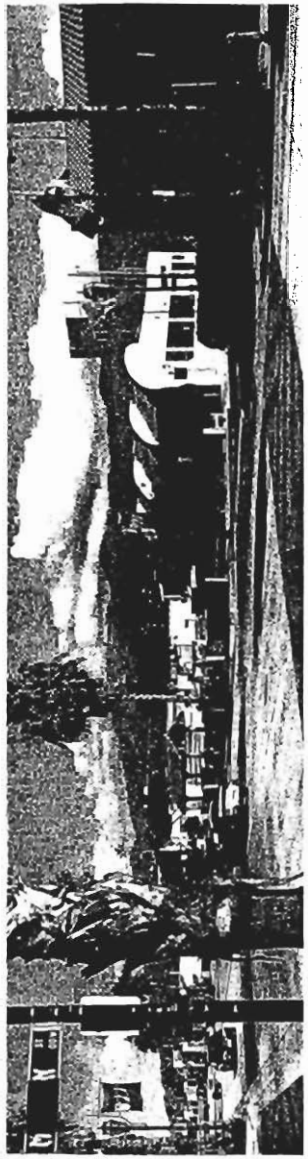
G-47

2.4 Visioning Report Theme IA. Maintain the beautiful vistas and sweeping views of the ocean and mountains. The existing vistas of the mountains seen from State Street, from Cabrillo Blvd. to VP 10, will be almost entirely blocked by the project. The photo-simulations conclusively demonstrate this fact. The DEIR, however, dismisses as not significant the loss of these vistas. The evidence more appropriately supports a finding that the visual impacts are significant. Therefore, the project is not consistent with the Visioning Report Theme IA.

G-48



Draft Environmental Impact Report Entrada de Santa Barbara	**Figure 1:** The current view from the southwest corner of the Mason Street-State Street intersection showing an unimpaired view of Cathedral and La Cumbre Peaks and several miles of the Santa Ynez Mountains. Note that views of the mountains over one-story buildings are readily available.	2001
Headley & Associates		



Draft Environmental Impact Report Entrada de Santa Barbara	**Figure 2:** The current view from VP8, DEIR Figure 4-15, reportedly from the southwest corner of the Mason Street-State Street intersection showing a largely impaired view of the mountains, particularly Cathedral and La Cumbre Peaks.	2001
Headley & Associates		

3.0 References

Kaplan, Stephen. 1979. "Perception and Landscape: Conceptions and Misconceptions". In *Our National Landscape.* U.S. Department of Agriculture, Pacific Southwest Forest and Range Experiment Station, Berkeley, CA.

U.S. Department of Agriculture - U.S. Forest Service. 1977a. *National Forest Landscape Management.* Volume 2, Chapter 1. "The Visual Management System. Agriculture Handbook No. 462. Washington, D.C.

1977b. *National Forest Landscape Management.* Volume 2, Chapter 1. "The Visual Management System, Visual Quality Objectives - Categories, Further Definition and Examples. California Region.

U.S. Department of Agriculture - Soil Conservation Service. 1978. *Procedures to Establish Priorities in Landscape Architecture.* Technical Release No. 65, Washington, D.C.

U.S. Department of Interior - Bureau Of Land Management. 1986. USDI Manual 8410, *Visual Resource Inventory and Evaluation.* Washington, D.C.

U.S. Department of Transportation-Federal Highway Administration. 1980. *Visual Impact Assessment for Highway Projects.* American Society of Landscape Architects, Washington; D.C.

APPENDIX A

VISUAL RESOURCES TECHNICAL APPROACH

Definition of the Resource. The visual resources of an area comprise the features of its landforms, vegetation, water surfaces and cultural modifications (physical changes caused by human activities) that give the landscape its visually aesthetic qualities. Landscape features, natural appearing or otherwise, form the overall impression of an area. This impression is referred to as "visual character." Visual character is studied as a point of reference to assess whether a given project would appear compatible with the established features of the setting or would contrast noticeably and unfavorably with them. Existing landforms, water surfaces, vegetation, and cultural modifications are treated as an established part of the setting if they reflect how the landscape was formed (i.e., ecological processes versus human activities), how it functions (i.e., as part of an urban versus agricultural context), and how it is structured ("patterns" of development, such as irrigated croplands versus natural mosaic of grasslands and woodlands).

Visual resources have a social setting, which includes public values, goals, awareness and concern regarding visual quality. This social setting is addressed as "visual sensitivity," the relative degree of public interest in visual resources and concern over adverse changes in the quality of that resource (U.S. Department of Interior, Bureau of Land Management [BLM], 1978; U.S. Department of Agriculture, Forest Service [U.S. Forest Service], 1977). As applied to visual impact analyses, sensitivity refers to public attitudes about specific views, or interrelated views, and is key in assessing how important a visual impact may be and whether or not it represents a significant impact.

Visual Sensitivity. The assessment of visual sensitivity establishes the most important viewing positions early in the analytical process. The other attribute, visual character, is assessed only in relation to the important, potentially affected views. Visual impacts subsequently are evaluated in the context of the character of these views.

To assess visual sensitivity, indicators of public concern were identified and sensitivity rated accordingly. The indicators are listed in Table 1 and reflect the concepts and methods of several federal agencies which treat sensitivity as a function of viewer activity, awareness, values, and goals (U.S. Forest Service, 1979a; U.S. Department of Agriculture - Soil Conservation Service [SCS], 1978; BLM, 1986; U.S. Department of Transportation, Federal Highway Administration [FHWA], 1980). Certain activities tend to heighten viewer awareness of scenic resources, while others tend to be distracting. People who are camping, picnicking, or driving for pleasure are more apt to notice the surrounding scenery than those commuting in heavy traffic or working at a construction site. Viewer awareness may also be heightened where areas are formally classified or otherwise designated as being of special interest, such as national historic monuments,

national and state parks and forests, scenic routes and overlooks, visitor information centers, and wildlife refuges.

High visual sensitivity is assumed to exist where landscapes, particular views, or the visual characteristics of certain features are protected through policies, goals, objectives, and design controls in public planning documents. Visual significance is not always a function of aesthetic appeal. The public may confer visual significance on landscape components and areas that would otherwise appear unexceptional (FHWA, 1980). For example, unexceptional landscapes along tertiary roads may be particularly important to local residents (Kaplan, 1979) as undesignated open spaces. Other areas may have regional or national cultural significance, but not be especially scenic. Nonetheless, their visual character may be considered important to their cultural value (FHWA, 1980). The three levels of sensitivity are high, moderate, and low:

High Sensitivity. High sensitivity suggests that at least some part of the public is likely to react strongly to a threat to visual quality. Concern is expected to be great because the affected views are rare, unique, or in other ways are special to the region or locale. A highly concerned public is assumed to be more aware of any given level of adverse change and less tolerant than a public that has little concern. A small modification of the existing landscape may be visually distracting to a highly sensitive public and represent a substantial reduction in visual quality.

Moderate Sensitivity. Moderate sensitivity suggests that the public would probably voice some concern over substantial visual impacts. Often the affected views are secondary in importance or are similar to others commonly available to the public. Noticeably adverse changes would probably be tolerated if the essential character of the views remains dominant.

Low Sensitivity. Low sensitivity is considered to prevail where the public is expected to have little or no concern about changes in the landscape. This may be because the affected views are not "public" (not accessible to the public) or because there are no indications that the affected views are valued by the public. For instance, little public concern for aesthetics is assumed to pertain to views from industrial, commercial and purely agricultural areas. There are exceptions: some agricultural areas are prized for their bucolic charm and views of such are highly sensitive. Visual sensitivity is low for views from all sites, areas, travel routes, and sections of travel routes not identified as moderate or high in sensitivity.

TABLE 1

INDICATORS OF VISUAL SENSITIVITY

HIGH SENSITIVITY

- Views of and from areas the aesthetic values of which are protected in laws, public regulations and policies, and public planning documents.
- Views of and from designated areas of aesthetic, recreational, cultural, or scientific interest, including national, state, county, and community parks, reserves, memorials, scenic roads and trails, interpretive sites of scientific value, scenic overlooks, recreation areas, designated open space, and historic structures, sites, and districts.
- Views of and from areas or sites of cultural/religious importance to Native Americans.
- Views from national or state-designated scenic highways or roads, or designated scenic highways or roads of regional importance.
- Views from resort areas.
- Views from urban residential subdivisions and segments of roads near them that serve as their primary access route.
- Views from segments of travel routes, such as roads, rail lines, pedestrian and equestrian trails, and bicycle paths, that are near designated areas of aesthetic, recreational, cultural, or scientific interest and which lead directly to them. Views seen while approaching an area of interest may be closely related to the appreciation of the aesthetic, cultural, scientific, or recreational significance of that destination.

MODERATE SENSITIVITY

- Views from segments of travel routes near highly sensitive use areas of interest serving as a secondary access route to those areas.
- Views from highways or roads locally designated as scenic routes and of importance only to the local population, or informally designated as such in literature, road maps and road atlases.
- Views from rural residential areas (groups of four or more homes) and segments of roads near them that serve as their primary access route.
- Views of and from undesignated but protected or popularly used or appreciated areas of aesthetic, recreational, cultural, or scientific significance at the local, county, or state level.
- Views from segments of travel routes, such as roads, trails, bicycle paths, and equestrian trails, that are near protected or popularly used undesignated areas important for their aesthetic, recreational, cultural, or scientific interest, and which lead directly to them.
- Views of and from religious facilities and cemeteries.

LOW SENSITIVITY

- Views from farmsteads, or groupings of fewer than four residences.
- Views from industrial (i.e., research, development, and manufacturing), commercial, and agricultural land areas.
- Views from travel routes serving as secondary access to moderately sensitive areas, or serving primarily commercial, industrial, or agricultural traffic.

Visual Character. As has been noted, visual character is assessed only relative to those moderately to highly sensitive views that may be affected by a proposed action. The visual character of the potentially affected landscape typically is described in terms of its landforms, vegetation, water features, and the "built" features of the environment. There are three objectives in assessing visual character. One is to identify the types of features considered both to be "visual resources," (i.e., features contributing to the positive visual quality of the potentially affected lands) and to be inherent to the area. It is usually obvious which features are visual resources and which are not. Rarely, features may be considered to be visual resources by the public yet have no demonstrable aesthetic appeal, as has been noted (Kaplan, 1979). For instance, local laws and regulations protecting certain views may indicate high sensitivity, even though the aggregate of features may possess no obvious positive visual qualities. Features are treated as inherent if they are expressive of the prevailing land uses, for instance, in an urban or rural area, or if they are among the physical features associated with the physiographic provinces in which a natural appearing landscape was located. The more defined the landscape is (i.e., totally natural appearing, purely residential, consistently rural), the more opportunity there is for introduced features not part of the prevailing character to noticeably contrast with those defining the landscape.

The second objective in assessing visual character is to identify patterns or the distribution of features that are characteristic of the affected setting. For instance, ecotones might define the distribution of vegetation in a natural setting. Architectural styles or density of housing might be defining attributes of a residential area.

If the analysis of character identifies visual resources (an aggregate of features with visually aesthetic qualities), the analysis turns to the third objective for assessing visual character, which is to assess the one parameter of visual quality that may be adversely affected by a proposed action, its existing visual condition. The existing visual condition of the landscape is a measure of the degree to which past actions have noticeably changed the landscape in ways that appear inconsistent with the visual resources of the affected lands. Existing visual conditions serve as the baseline for evaluating the magnitude and intensity of potentially adverse changes in the landscape. They vary inversely with how noticeable incongruous features may be within current public views and are defined in terms of four Visual Modification Classes (VMC), defined in Table 2. Landscapes where all features appear compatible with the inherent visual resources of the area are of the highest quality, while those where incompatible features dominate the scene are of the lowest quality. In some cases, the character of the potentially affected lands comprise features with no obvious aesthetic qualities (i.e., there are no "visual resources"). Here, although all features within view may appear compatible with one another, visual quality is low. A purely industrial landscape is an example; there are no visual resources, visual quality is low, yet all features are compatible with the setting. For such lands, there is no potential for adverse visual impacts and an assessment of existing visual conditions is not informative.

TABLE 2

VISUAL MODIFICATION CLASS DEFINITIONS

- **VM Class 1** - Not noticeable: changes in the landscape are within the field of view but generally would be overlooked by all but the most concerned and interested viewers; they generally would not be noticed unless pointed out (inconspicuous because of such factors as distance, screening, low contrast with context, or other features in view, including the adverse impacts of past activities).

- **VM Class 2** - Noticeable, visually subordinate: changes in the landscape would not be overlooked (noticeable to most without being pointed out), they may attract some attention but do not compete for it with other features in the field of view, including the adverse impacts of past activities. Such changes often are perceived as being in the background.

- **VM Class 3** - Distracting, visually co-dominant: changes in the landscape compete for attention with other features in view, including the adverse impacts of past activities (attention is drawn to the change about as frequently as to other features in the landscape).

- **VM Class 4** - Visually dominant, demands attention: changes in the landscape, are the focus of attention and tend to become the subject of the view; such chances often cause a lasting impression of the affected landscape.

Definition of Visual Impacts. An adverse visual impact occurs when, within public view: 1) an action perceptibly changes features of the physical environment so that they no longer appear to be characteristic of those inherent to the region and/or locale; 2) an action introduces features to the physical environment that are perceptibly uncharacteristic of the region and/or locale; or 3) aesthetic features of the landscape become less visible (e.g., partially or totally blocked from view) or are removed.

Changes that seem uncharacteristic are those that appear out of place, discordant, or distracting. The intensity of a visual impact depends upon how noticeable the adverse change may be. Noticeability is a function of project features and their context and viewing conditions (angle of view, distance, primary viewing directions, etc.). Four levels of visual impact intensity (noticeability) may occur. These are termed "Visual Modification Classes" (VM Classes) and are defined in Table 5.13-2. Visual impacts are further defined as follows:

- **Significant Visual Impacts:** The following definition augments the CEQA Guidelines for determining visual impacts to be significant. Significant Visual Impacts are those occurring for more than one year and which result in: 1) an inconsistency with laws, ordinances, regulations, and standards (LORS) applicable to the protection of visual resources; or 2) a perceptible reduction of visual quality. The perception that visual quality has been reduced is partly a function of public sensitivity to adverse visual impacts. Where there is low sensitivity, it is assumed that the public generally would not notice a change in the landscape as causing a reduction in visual quality, whereas in moderately to highly sensitive views, the same impact would be perceived as a lessening in visual quality. Table 3 summarizes the relationship of impact intensity, sensitivity, and the perceived reduction in visual quality.

- **Temporary Visual Impacts:** Those lasting for one year or less.
- **Short-Term Impacts:** Those lasting for more than one year but fewer than five years.
- **Long-Term Impacts:** Those lasting for five years or more.

Identifying the Critical Viewing Positions. Critical views are partly defined as those that are moderately to highly sensitive. The public is considered to have a substantial concern over adverse changes in the quality of such views. Criteria used to identify moderate to high sensitivity have been presented in Table 1. Critical views also are defined as being those public views that would be most affected by the subject action (e.g., the greatest intensity of impact due to viewer proximity to the project and project visibility, duration of the affected view, etc.).

The approach to identifying critical viewing positions starts with an inventory of moderately to highly sensitive viewing positions in the project vicinity, using the referenced criteria. A review of literature and maps, and an inspection of the project site

and the potentially affected environs, served to identify those features and public use areas of cultural, historic, recreational, and aesthetic significance.

The range of critical views are considered and several representative views in which the proposed facilities would be most noticeable are selected for detailed analysis. This decision is based primarily on proximity and degree of project exposure. Consideration is also given to having the views be representative of the public experience; i.e., that they be from viewing positions readily accessible to the public. A final criterion is that the representative views be from viewing positions that the public can readily locate, based on the description and photographs presented in this report.

Assessing the Magnitude and Significance of Impacts on the Most Critical Views. Three-dimensional computer-generated models of the project features are typically developed by the project engineers or the visual resources consultant. The models are rendered relative to angles of view and viewing distances corresponding to specific critical views representing the range of sensitive public views affected. They are then merged with photographs to produce photo-simulations. To assure the accuracy of the scale and positioning of the model relative to the photographs, control points are identified in the landscape and introduced to the model of the project facilities. These control points include landmarks that can be identified in USGS topographic maps or scaled aerial photographs. Adjustments in the three-dimensional software's "camera lens" and its line of sight are made to adjust the model and control point markers to coincide with the control points as they appear in the photographs serving as the context for the models.

In assessing how noticeable the visual impacts may be (their Visual Modification Class), several factors are considered: the context of related views; primary viewing direction(s); viewing distance; project exposure; duration of viewing; relationship of the subject view to the sequence available; the presence of existing features of competing visual interest; and established features tending to draw attention toward the project facilities (focal point sensitivity). Finally, the magnitude of the impact (Visual Modification Class) is compared to the sensitivity of the affected view to determine whether a perceptible reduction in scenic quality would occur (Table 3). As noted, the perception of lowered visual quality is one of three criteria for significance; the other two are duration of the impact and its consistency with laws, ordinances, regulations, and standards applicable to the protection of visual resources.

TABLE 3

RELATIONSHIP OF IMPACT INTENSITY (VM CLASS) AND VISUAL SENSITIVITY TO A PERCEPTIBLE REDUCTION OF VISUAL QUALITY

Magnitude of Impact[2]	Sensitivity[1]		
	High	Moderate	Low
VM Class 4	P	P	N
VM Class 3	P	P	N
VM Class 2	P	N	N
VM Class 1	N	N	N

P: Perceptible Reduction in Visual Quality
N: No Perceptible Reduction in Visual Quality

1 **High Sensitivity (H):** Great public concern over adverse change in scenic/visual quality, reactive, vocal. Affected views are rare, unique, or in other ways are special and highly valued in the region or locale.

Moderate Sensitivity (M): Some public concern and controversy over such change. Affected views are secondary in importance or similar to views commonly found in the region or locale.

Low Sensitivity (L): No evidence of public concern over, or interest in, scenic/visual resource impacts on the affected area.

2 **Visual Modification Class:**

(VM Class 4) Visually dominant, demands attention
(VM Class 3) Distracting, competes for attention
(VM Class 2) Noticeable, visually subordinate
(VM Class 1) Not Noticeable

APPENDIX B

STATEMENT OF QUALIFICATIONS

Lawrence C. Headley

Environmental Support Services:

- Visual Imact Assessment and Photo-Simulation
- National, State and Local Experience

EDUCATION

M.L.A. Landscape Architecture & Environmental Planning, Utah State University
A.B., Communications, Division of Journalism, Stanford University

EXPERIENCE SUMMARY

Lawrence Headley is licensed in the State of California to practice Landscape Architecture. His 21 years of experience in land management planning and site design include 17 years as sole proprietor of Headley & Associates (founded in 1984), a firm specializing in visual impact assessment and photo-simulation.

Mr. Headley is thoroughly familiar with the Visual Management Systems of the USDA-Forest Service, USDI-Park Service, and USDI-Bureau of Land Management. The methodology he helped develop while working for the Forest Service was adopted by three of the National USFS Regions during the early 1980's (the "Effective Alteration" approach to assessing visual impacts). Since then he has refined his methodology to address impacts in rural and urban environments, as well as issues concerning natural landscapes. His analytical approach has been successfully applied over the last 17 years to numerous environmental documents at the local, state and federal levels. The approach efficiently focuses on issues of concern and clearly articulates criteria for significance, while his computer-assisted visual simulations are always accurate, photo-realistic, and understandable by the general public.

Recent experience includes five Applications for Certification to the California Energy Commission for projects located in southern, central and northern California. The analyses were done to comply with CEQA documentation standards.

Mr. Headley has substantial DEIR experience within Southern California and Santa Barbara County. In addition, he has contributed to major EIS's locally, within Southern California, and nationally. Mr. Headley's major DEIR/EIS experience has been with projects in Santa Barbara and San Luis Obispo County that include several offshore and onshore oil development projects as well as one remediation project (UNOCAL Diluent Remediation DEIR; the Point Arguello Field and Gaviota Processing Facility Area Study and Chevron/Texaco Development Plans Project; the Union Oil Project/Exxon Project Shamrock and Central Santa Maria Basin Area Study; and the Exxon Lompoc Pipeline

Project). His DEIR experience in Southern California includes the Southern California Rapid Transit District Headquarters Building Project DEIR in Los Angeles, and several L.A. Dept. of Water and Power and University of California project DEIR's. Nationally, he has contributed to several major EIS's: the Superconducting Super Collider (Dept. of Energy), and several Air Force Projects (ECTC, GWEN, MX Missile).

Permit application experience includes Arco's Coal Oil Point Project; two FERC licensing projects (Bradley Lake hydroelectric project, Kenai Peninsula, Alaska; and the Crystal Creek Pumped Storage Hydroelectric Project, Big Bear Lake, California); and a role as General Partner for a subdivision within the City of Santa Barbara (responsibilities included the applicant's environmental assessment, site planning, landscape design).

LIST OF PROJECTS

National:

- Superconducting Super Collider (SSC) Project Supplemental EIS, U.S. Department of Energy (1989-90).
- Superconducting Super Collider (SSC) Project Site Selection EIS, U.S. Department of Energy (1988-89).
- Ground Wave Emergency Network (GWEN) Project, U.S. Air Force Programmatic EIS (1986-1989).
- Electronic Combat Test Capability (ECTC) Project Draft EIS for the Utah Test and Training Range, U.S. Air Force (1989-1990).
- Intermountain Power Project (IPP) Environmental Assessment, Los Angeles County, California (1986).
- Intermountain Power Project (IPP) - Mona Microwave Communications System - Levan Peak, Utah Site Plan and Design Narrative Study (1984).

State of California:

- Otay Mesa Generating Project. Application for Certification (AFC) to the California Energy Commission (1999).
- La Paloma Generating Project. Application for Certification (AFC) to the California Energy Commission (1998).
- Long Beach District Energy Facility Project Application for Certification (AFC) to the California Energy Commission (1998).
- Pittsburg District Energy Facilty Project. Application for Certification (AFC) to the California Energy Commission (1998).

- U.S. Gen Fellows Generating Project, draft Application for Certification (AFC) to the California Energy Commission (1994-1995).
- Aesthetics Technical Appendix for the University of California, Riverside Fine Arts/Surge Building Project DEIR (1994).
- Crystal Creek Pumped Storage Hydroelectric Project, Big Bear Lake, California Exhibit E. Federal Energy Regulatory Commission licensing application (1992-94).
- Southern California Rapid Transit District Headquarters Building Project Draft and Final DEIR (1992)
- Humanities and Social Sciences Unit 1 Project, University of California, Riverside Draft and Final DEIR (1991).
- San Bernardino Regional Medical Center Relocation Project DEIR Draft and Final DEIR (1990-91).
- Los Angeles Basin Telecommunications Network Project Scenic, Draft and Final DEIR, Department of Water and Power, Los Angeles County, California 1989-1990).
- Anderson Peak-Big Sur Radio Project EA, Big Sur, California (1985)
- North County Resource Recovery Facility DEIR, San Marcos, California (1985).
- Bradley Lake Hydroelectric Project. Alaska Power Authority application (Exhibit E) to the Federal Energy Regulatory Commission, Kenai Peninsula, Alaska (1983).
- California High Speed Train, in support of the preliminary draft environmental document submitted to the California Public Utilities Commission for the American High Speed Rail Corp. Southern California (1983).

Counties of Santa Barbara and San Luis Obispo:

- UNOCAL Diluent Remediation DEIR. County of San Luis Obispo (1996-97)
- Mobil Clearview Project preapplication visual simulations of slant drill rig. County of Santa Barbara (1993).
- Exxon Lompoc Pipeline Project DEIR/EIS (1986).
- Union Oil Project/Exxon Project Shamrock and Central Santa Maria Basin Area Study DEIR/EIS (1985).
- Point Arguello Field and Gaviota Processing Facility Area Study and Chevron/Texaco Development Plans Project DEIR/EIS (1984).
- B-2 Review of Point Arguello Field and Gaviota Processing Facility Area Study and Chevron/Texaco Development Plans Project DEIR/EIS (1989).

- Shell Hercules Project Draft DEIR/EIS Scenic/Visual Resources Technical Reviewer (1989).
- Exxon Goleta Parking Lot Project CEQA Addendum (1989).
- Coal Oil Point Project: Arco Oil and Gas Company's application (1983).

Lawrence Headley & Associates, March 15, 2001

G-1. Please see responses to specific concerns below. The EIR analysis does consider the importance of the continuum of public viewing experience.

G-2. The selection of the 19 different viewpoint used to illustrate potential project impacts on scenic public views is discussed in section 4.4.1, Photographic Simulations and View Angle Analysis. The viewpoints were selected to be representative of a reasonable range of visual conditions in the vicinity of the project. They were not selected to only illustrate the potential view blockage, but instead provide a continuum of the visual experience a person might have when traveling along Cabrillo Boulevard and the Waterfront, and along lower State Street. Additional viewpoints (e.g., at Mission Creek) were added in response to NOP comments. The analysis also provides a methodical description of the criteria and basis for conclusions about impact significance levels. Also, please see responses to specific concerns below.

G-3. Please see response to comment F-28. Section 4.3.2.1, Impact Significance Criteria, is consistent with the guidance provided in state and City CEQA guidance for evaluation of view impacts.

G-4. The comment is not sufficiently specific to allow for a response. Please see responses to specific concerns below.

G-5. The comment is not sufficiently specific to allow for a response. Please see responses to specific concerns below.

G-6. The comment is not sufficiently specific to allow for a response. Please see responses to specific concerns below.

G-7. The comment is not sufficiently specific to allow for a response. Please see responses to specific concerns below.

G-8. CEQA Section 15151 states that an EIR will provide a reasonable level of detail regarding the impacts of a project: " the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible.... The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." The photosimulations in the EIR fulfill this objective, given the need to provide for a user-friendly and accessible document, and reasonable cost limitations.

G-9. The comment is not sufficiently specific to allow for a response. Please see responses to specific concerns below.

G-10. The environmental setting of the project area is presented in section 4.1. The natural and built environmental features, including the Santa Ynez Mountains, foothills, Waterfront, and Chase Palm Park have been described and considered. The impact analysis is focused on the issue of impacts to public views as directed by the court. Architectural compatibility is a planning consideration that will be evaluated by City decisionmakers as part of their evaluation of the land use and design

merits of the project with respect to the land use merits of the Entrada project, rather than with respect to potential impacts on the environment.

G-11. Please see response to comment G-10. The "visual sensitivity" referenced is defined for use in visual resource impact assessment associated with federal undertakings. In addition to not having an application under CEQA, the types of federal projects for which the guidance is directed are large scale, rural environmental contexts. The proposed Entrada project is in an urban context. Therefore, the federal guidance cited in the comment is not relevant to the proposed project. However, existing state and City plans and policies reflect community values relative to public scenic views as described in the EIR. The criteria included in the EIR for determining important public scenic views and the level of impact on important public scenic views is based on these established community values.

G-12. Please see response to comment G-10 and G-11. The EIR analysis of existing views includes consideration of existing elements that degrade or block views of natural features. The proposed project is within an urban environment in which natural features provide a background. This character is described in the EIR.

G-13. Section 4.1 provides an overview of the visual resources within the project vicinity along lower State Street. The discussion presented provides a reasonable level of information to allow the reader to place the proposed project within a regional context. The "Existing Condition" photos for each viewpoint in section 4.4 generally provide additional photographic evidence of the existing condition in the project area. Please see response to comment G-8.

G-14. The EIR uses a qualitative approach to describe and evaluate potential project impacts on public scenic views in an urban setting. There is no requirement or guidance in CEQA directing that this type of evaluation be quantitative and the City has no adopted quantitative criteria. Please see response to G-11, as to the differences between federal guidance and its applicability in the CEQA process.

G-15. La Cumbre Peak, Cathedral Peak, Arroyo Burro, and San Marcos Pass are not referenced in any existing City or state plans or policies as important public/visual resources, or as specifically requiring complete view protection from all viewpoints. They therefore are not considered discrete elements in this analysis.

G-16. Please see response to comment G-11 and F-38. The EIR considers the visual expectations as identified in existing plans and policies as defined in to Local Coastal Plan policies that define existing visual characteristics of the Waterfront. The evaluation of existing views takes into account factors of areas of heavy public usage, scenic quality, and inclusion of visual resources, which reflect perceptions of visitors and residents.

G-17. The overall existing setting is described and discussed in section 4.1. The specific description of existing public views in the vicinity of the project is provided in section 4.4 with respect to identifying the importance of existing visual resources and public views.

G-18. The evaluation of scenic view impacts is resistant to quantified standards. The intactness of a view is a commonly used qualitative criterion, as recommended by national planning organizations including the American Planning Association and the National Scenic Highway Program. It is used to assist in determining the significance of the existing view. Section 4.3.1.2 describes how the EIR identifies the significance of a public scenic view. The description of the environmental setting is a component of this significance determination. The full disclosure of this information is provided in the EIR. The evaluation of project impacts considers and characterizes the extent of view blockage of important public scenic views, which clearly includes the concept of change to intactness.

G-19. Please see response to comment G-18. The EIR provides a regional setting in section 4.1.1 and the "importance" of the existing visual condition is provided from each of the 19 views under the subsection, "Importance of Existing Visual Resources and Public Views." The EIR is consistent with the guidance in CEQA Guidelines Section 15125(a):

> An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, ... from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives.

G-20. Please see EIR section 4.3.2.1, which describes the qualitative criteria used in identifying significant impacts. The EIR evaluation criteria are intended to be consistent with guidance provided in CEQA Guidelines Section 15064 and Appendix G, Environmental Checklist Form. This consistency includes the following statements.

From Appendix G:

"Would the project:

a) Have a **substantial** adverse effect on a scenic vista?
b) **Substantially** damage scenic resources? and
c) **Substantially** degrade the existing visual character or quality of the site and its surroundings?
d) Create a new source of **substantial** light or glare which would adversely affect day or nighttime views in the area? [emphasis added]

From this EIR:

The proposed project would represent a significant adverse impact to an important public scenic view if it would:

- Conflict with the applicable vista protection standards, scenic resource protection requirements, or design criteria of the City, or if it would alter or obstruct existing public viewsheds from or across the project site, including scenic features associated with designated scenic highways, by:

  1. Substantially degrading an important public scenic view;
  2. Substantially blocking an important public scenic view corridor; or
  3. Substantially impairing the visual context of the Waterfront area.

G-21. Please see section 4.4.1 for a discussion of the selection of public viewpoints. The viewpoints were not arbitrarily selected, but were identified as representative viewpoints and based on stated factors including the following: (1) Some views were consistent with viewpoints that had been selected for analysis during the preparation and consideration of the previous Second Revised Mitigated Negative Declaration (MND), since continuity in analysis between the MND and the EIR was considered appropriate. (2) Additional viewpoints were added in the EIR analysis based on comments received during scoping. (3) Additional viewpoints were added in the EIR analysis based on comments received from decisionmakers. 4) Additional viewpoints were selected to represent important locations along the Waterfront and lower State Street highlighted in City plans and policies. The differences in intactness between Figure 1 provided in the comment letter and View 8 in the EIR are inconsequential to the determination of public scenic view importance. In both photos, existing structures and street trees and a portion of the Santa Ynez Mountains are visible, views of the foothills are blocked in many locations, and street trees and street lights are within the view. Selection of alternative viewpoints along lower State Street would result in conclusions drawn regarding view intactness similar to the above comparison.

G-22. Please see response to comment G-8. The EIR has been formatted to provide as great an image as reasonably possible, given the requirements of preparing a document for public distribution. The photosimulations have been identified by a broad cross-section of the public, regardless of their support of the project, as being objective and professional. Within the limits of current technology, they are reasonably accurate representations of the human experience.

G-23. Chapter 3.0 presents the discussion of proposed project consistency with state and City plans and policies. No inconsistencies were identified, so this is not a basis for determining a significant impact. Also, please see response to comment F-28. Section 4.3.2.1, Impact Significance Criteria, is consistent with the guidance provided in CEQA and reflects incorporation of policy direction. Please see section 4.3.2.1 for the significance criteria.

G-24. Please see section 4.4. Evidence was provided to determine the significance of project impacts in accordance with all of the stated evaluation criteria. Additional text has been included in section 4.4 to clarify these determinations.

G-25. Please see response to comment G-20. Section 4.3.2.1, Impact Significance Criteria, is consistent with the guidance provided in CEQA and reflects incorporation of policy direction. CEQA Guidelines Section 15064 also states that the Lead Agency has the authority to determine what constitutes a "substantial adverse effect" or significant impact.

G-26. Comment noted. No response is required.

G-27. The comment suggests that any and all views of the Santa Ynez Mountains from State Street are important public scenic views. State and City plans and policies do not state that every view of the Santa Ynez Mountains from every point on State Street constitutes an important public scenic view. The EIR identifies the Santa Ynez Mountains as important visual resources, but there are no state or City plans or policies that make views of them important public scenic views from every viewpoint for environmental purposes.

G-28. Please see section 4.3 to understand that the EIR establishes the inter-relatedness of three criteria in determining the importance of a public scenic view. Additional criteria include "a large number of viewers and a considerable duration of view," and "scenic quality."

G-29. The comment is inaccurate. Please see response to comment G-28.

G-30. Please see section 4.3.1.2, and response to comment G-18. The magnitude of a view is simply the extent to which the view contains important visual resources defined in City plans and policies. The EIR states that one way of characterizing this is how continuous is the view of the Santa Ynez Mountain ridgeline.

G-31. Please see section 4.3.1.2, and response to comment G-18. A unique view would have high levels of distinctiveness, such as a view of the Santa Ynez Mountains from the Dolphin Fountain. A view of the Santa Ynez Mountains from lower State Street that only contains portions of the foothills and ridgelines will not be as representative of a view featuring this important visual resource as one that has "sweeping views of the Santa Ynez Mountains."

G-32. Please see response to comment G-14. The wording referenced by the commentor regards questions that aid in further defining the variables that describe scenic qualities.

G-33. The EIR discussion evaluates each of the criteria in determining view scenic quality. For example, the Project Impact Assessment in section 4.4.7, View 6 does state that the view has abundant views of the Santa Ynez Mountains. The section

has been revised in the FEIR to provide additional explanation of the view's lack of distinctiveness, and resulting absence of substantial view degradation, blockage, or impairment. The EIR acknowledges that the View 7 is a view corridor with views of the Santa Ynez Mountains, and therefore represents an important visual resource. The text points out, however, that this is not a distinctive, or unique view along lower State Street. The text of section 4.4.8, View 7, has been revised in the FEIR to clarify these points. The text identifies that the reduction in the view corridor width would not substantially degrade the important public scenic view. The view blockage would be adverse, but not substantial, as the corridor would be maintained, and the Santa Ynez Mountain ridgeline would be visible. Therefore, the important view corridor quality would be maintained. The text in the FEIR has been revised to provide clarification regarding the lack of substantial degradation, blockage, or impairment of the public scenic view.

G-34. The comment identifies an important characteristic of the lower State Street, that it is an urban context, unlike rural landscapes evaluated in lands regulated by the US Forest Service, Bureau of Land Management, etc. Please also see response to comment G-14.

G-35. Please see response to comment G-11.

G-36. Please see response to comment G-18.

G-37. In addition to not having any real application under CEQA, the types of federal projects for which the guidance is directed are large scale, rural environmental contexts. The proposed Entrada project is in an urban context. Therefore, the federal guidance cited in the comment is not relevant to the proposed project. As is noted in State CEQA Guidelines section 15064:

> The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area.

The EIR identifies that the proposed Entrada project would not have a significant impact on particular public scenic views as the quality has already been compromised. The additional intrusion caused by the project may be adverse, but less than significant. The water and air quality comparison is not appropriate, but a similar approach is used in other qualitative impact topics, such as biological and archaeological resources.

G-38. The analytic methodology outlined in section 4.3.2.1 for determining potential project impacts on public scenic views is completely consistent with and supported by City plans and policies. The criteria identified in this section are based directly

on illustrations in the City's Local Coast Program Visual Resources Map (see Appendix C), and text from LCP Policy 9.1 (see section 3.2), Waterfront Area Aesthetic Criteria for New Development Assessment (see section 3.3), and the Waterfront Area Design Guidelines (see section 3.3). The methodology criteria are in fact substantively reflecting City adopted plans and policies related to the protection of public scenic views. Duration of views is related to the criteria to determine the importance of a public view, defined in section 4.3.1.3. Responses to specific four items mentioned are provided below.

G-39. The "snapshot" concept and its limitations are explained in section 4.4.1 of the EIR. The "visual context" of the Waterfront area is defined in the last significance criteria, footnote 3. in section 4.3.2.1. For example, the visual context of View 2 includes the ability to experience the Waterfront by slightly changing the orientation from this viewpoint to the south. The visual expectations as identified in existing plans and policies refer to Local Coastal Plan policies that define existing visual characteristics of the Waterfront (please see section 3.3, Local Coastal Plan). The Waterfront Area Aesthetic Criteria for New Development Assessment states, "Views to the foothills and mountains are still largely unimpeded by structures; in particular, the views from Stearns Wharf, Chase Palm Park, and East Beach offer unparalleled beauty." "Views are the most important dimension of naturalness. These views are to the ocean, other points along the Waterfront, and to the foothills and mountains. The contrast between the sweep of the coastline and the sweep of the mountains is especially dramatic and heightened by the linear elements of Chase Palm Park and Cabrillo Boulevard." The extent to which the views analyzed in the EIR are consistent with these characteristics is used to determine the relative importance of its public scenic view quality. There are several cases discussed in the EIR (i.e., View 6 and 6A) where an individual standing at one viewpoint can turn his or her head slightly and experience a view that incorporates the "visual context" of the Waterfront area, while the particular isolated view that would be impacted by the Entrada project does not contain this context.

The extent to which the views analyzed in the EIR are consistent with these characteristics is used to determine the relative importance of its public scenic view quality. For example, View 2 has less of this quality than other views readily experienced from this location by changing the orientation of one's line of sight at this viewpoint to the south. Turning one's head in a slightly different direction from the same viewpoint is not "an ephemeral compensating view." Instead, it is the dominant view that contains those scenic elements that are considered important in City plans and policies.

G-40. The criteria identified used to determine if a view is an important public scenic view are different than those used to determine the extent to which the proposed project would impact the view. It is first necessary to determine if a particular view is an important public scenic view. It the view is not an important public scenic view, the project would not have a significant impact on this view, regardless of the extent to which the view would be obstructed, etc.

G-41. Please see response to comment G-39. The use of panoramic views that are experienced from viewpoints selected in the EIR are used to illustrate the ability to experience the "visual context" of the Waterfront area as defined in the last significance criteria, footnote 3., in section 4.3.2.1. The EIR explains that Views 5 and 6 are taken from a "transition area" between the

shoreline and more commercially developed land uses along lower State Street. The use of panorama views is necessary because the impact assessment on important public scenic views required a broader perspective beyond the "snapshot views" of Views 7, 8, and 9. Please also see response to comment G-21. The viewpoints selected are representative of the views experienced as one travels along lower State Street, as are those selected by the commentor, in the Figure 1 attached to the comment. An application of the criteria in section 4.3 to Figure 1 would result in the same conclusions as presented for View 8.

G-42. Please see response to comment G-41. The expectations referenced are based on adopted City plans and policies.

G-43. The EIR identifies an existing view corridor on View 7, and not in View 5 or 6. The importance of a public view corridor is based on City plans and policies, as discussed in response to comment F-44. The obstruction and degradation of the existing View 7 view corridor would be adverse, but less than significant.

G-44. The comment confuses criteria used to determine an important public scenic view, which include the duration of view (see section 4.3.1.3), with the criteria for determining the project's impact. The comment is correct in that many of the viewpoints along lower State Street do not have an extensive duration of view, when compared to those on Cabrillo Boulevard. An exception is View 11, taken from the entrance to the City Railroad Depot. The comment suggests that all views of the Santa Ynez Mountains from all viewpoints are important public scenic views, as they are part of a continuum. The EIR disagrees with this perspective. Using this criterion, any view along the entire length of any street with views of the Santa Ynez Mountains within the City of Santa Barbara would be important, and any project perceived as affecting this view would be significant. This perspective lacks any application of an environmental impact significance criteria, and is not supported by CEQA or state or City plans or policies. The commentor appears to presume that "any" impact is a significant adverse environmental impact. However, CEQA is clear that this is not the appropriate standard for determining an adverse environmental impact, particularly with respect to a project's potential effects on aesthetics.

G-45. CEQA Section 15125(d) requires that the EIR "discuss any inconsistencies between the proposed project and applicable general plans and regional plans..." The section states that, " where individual projects would run counter to the efforts identified as desirable or approved by agencies in the regional plans, the Lead Agency should address the inconsistency between the project plans and the regional plans. As a result of this analysis, Lead Agencies (such as the City) may be able to find ways to modify the project to reduce the inconsistency." The analysis of project consistency with applicable State and City plans and policies contained in the Revised Second Mitigated Negative Declaration adopted by the City Planning Commission and on appeal by the City Council was found to be legally adequate and approved by the Santa Barbara Superior Court. Due to these unique circumstances this EIR reports the actual policy consistency for this project previously made by the City regarding plans and policies related to public scenic views. There is nothing in this EIR analysis that changes this earlier assessment. However, as noted in the introduction to Chapter 3.0, Introduction of this EIR: "These

decisionmakers will review this project again and are free to re-evaluate this consistency determination." It is the role of elected and appointed decisionmakers to interpret and apply adopted state and City plans and policies language. The fact that the commentor differs with City staff, HLC, PC, and CC on interpretation and application of state and City plans and applications policies in this matter is acknowledged and will be forwarded for decisionmaker consideration.

G-46. Please see response to comment G-45.

G-47. Please see response to comment G-45.

G-48. Please see response to comment G-45.

916 Anacapa Street • Santa Barbara, California 93101 • (805) 966-3979 • Fax (805) 966-3970

CITIZENS PLANNING ASSOCIATION OF SANTA BARBARA COUNTY, INC.

Debra Andaloro, Project Planner
Community Development Department
City of Santa Barbara
630 Garden Street
Santa Barbara, CA 93101

March 23, 2001

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

RE: CPA Comments on Draft EIR on Entrada de Santa Barbara

H-1 CPA finds the DEIR to be totally unsatisfactory and in need of revision. The analysis is inadequate, conclusionary and riddled with transparent rationalizations. The problem with this DEIR is that rather than provide an independent and objective analysis, the document attempts to justify the conclusions that the City has already reached. The beginning of the document should have a disclaimer that it was prepared by the consultant in conjunction with the City and that City staff, who are not experts, dictated many of the conclusions.

H-2 In addition, the DEIR is not responsive to the items we had asked to be included at the scoping hearing.

H-3 However, we are pleased that finally attention now is focused on the potential impacts of this project on visual resources. We believe that the pictures and simulations of the most relevant view points along State Street, Views 5, 6, 7, 8, 9, and 10, even using the DEIR's "new" impact significance criteria, do show significant adverse impacts on views of the mountains and the foothills.

H-4 The following are problem areas and a discussion of items that we had asked to be included that were not adequately addressed in the DEIR. We also refer you to the submissions of our attorney, Tanya Gulesserian and Lawrence Headley, our view expert.

Land Use and Policy Considerations (Section 3.0):

H-5 The fact that the court did not find that policy inconsistency rose to the level of a significant impact, does not mean that there are not policy inconsistencies. The whole issue of policy consistency must be considered based on the evidence in the EIR.
The whole of Section 3 is nothing more than a recital of the history of the project. The Introduction states that:

"This summary evaluation differs from other EIR evaluations of plans and policies in that

the proposed project has been reviewed by the City's Planning Commission and City Council. Each of the City's decisionmaking bodies has made the finding that the proposed project is consistent with relevant public scenic view plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect."

H-5 The fundamental problem is that these previous determinations of the decisionmakers and their findings were made without the very data and information that is supposed to be supplied by the focused EIR on visual resources. Without being based on the new information, this whole section is conclusionary, without having basis in fact, and thus constitutes nothing more than a recital of how the project was initially approved. What needs to happen is a new discussion of policy consistency based on the new material presented in the EIR.

Additional materials submitted by our attorney and view expert describe how the proposed project is inconsistent with the visual resources policies of the Coastal Act, the LCP and the General Plan.

Public View Analysis (Section 4.0)

H-6 View Points:
The court found that CPA made a fair argument based on substantial evidence that the proposed project potentially had an impact on visual resources. The substantial evidence dealt mainly with the blockage of mountain views from State Street. This is one of the most important areas the EIR should be focused on.

H-7 View points selected should be contiguous and sequential and not just from miscellaneous isolated specific view points. A sequence of view points, at regular intervals, should cover the length of State Street from Cabrillo Boulevard to Yanonali Street. This becomes even more critical given the language on p. ES-8 that talks about the conclusion of the EIR being based on the totality of 19 separate project views and analysis. By the inclusion of a number of views that are not the relevant ones in question, the totality of the conclusion is improperly weighted against finding any significant impact.

The DEIR does not identify the exact location of the points selected and fails to discuss how and why the points were selected. We would like this information included. It is noteworthy that on page 4-20 of the DEIR, it says the 19 viewpoints were selected by the City Community Development staff and not by an independent view expert.

H-8 Baseline Visual Conditions:
A description of the baseline visual conditions or setting, that is the existing visual character of the area, needs to be provided. This needs to be done before one can assess changes or impacts caused by the proposed project. The immediate area of concern is the views of the mountains from State Street. Views from Cabrillo Blvd., the funk zone, Mason Street and the neighborhood to the west should also be addressed, but to a lesser degree.

H-9 Included in the existing setting should be a full discussion about how the part of State Street

H-9 where the proposed project is to be located is different or distinguishable from the downtown. For the most part, one does not see the mountain and Riviera views from the area above 101. However, the situation changes after you go under the 101 overpass traveling towards the ocean. Here you see mountain views and the Riviera and a sense of openness exists.

H-10 The baseline description should include a complete analysis of the existing visual resources in the area and a complete inventory of the built environment. Full analysis includes, among other things, the extent of foothill and mountain views and the importance of Cathedral and La Cumbre Peaks. Analysis of the built environment should include the architecture, height (how many buildings are one story, two, three etc), bulk, mass and scale of existing structures in the area. Is there a definable character to the area? It is only after the existing baseline is adequately described that there can be an informed comparison of the existing baseline visual conditions with the proposed project. Only then can the changes that the proposed project has on the visual character, natural views and built environment be analyzed and discussed.

H-11 An accurate portrayal of the existing viewshed needs to be provided, including actual photos of the existing panoramic views from State Street. Then what will be lost as a result of the proposed project needs to be provided in terms of some objective criteria, such as what percentage of the views of the mountains and Rivera will be blocked.

H-12 What are the cumulative impacts of this project on the area? If one and two story buildings are more representative of existing uses, then will the proposed project change or effect the visual character? Will the project lead to a progressive loss of views in the waterfront area? Will the proposed project lead to a progressive change in character?

H-13 Criteria:
We requested objective, articulate criteria for evaluation. The DEIR, on page 4-18 and 4-19, attempts to articulate three criteria for assessing the importance of public views:

The view/view corridor includes one or more important visual resources.
The view/view corridor has scenic quality.
The view/view corridor is experienced from a heavily visited public viewpoint.

If these criteria are appropriate, they should be applied as part of the description of the existing setting.

H-14 However, there are internal problems with this analysis. "Importance" is determined by what is "important". This is circular reasoning. There is no objective criteria for determining what is important. The meaning of important view/view corridors is defined as including important visual resources which "are identified in City policies to include: Santa Ynez Mountains (foothills and ridge lines)". "Views/view corridors specifically identified as important by City or state plans, policies or regulations include the following: Views/view corridors of the ocean, harbor, and Santa Ynez Mountains from State Street..." If one takes this at face value, this means that all views of the Santa Ynez Mountains including foothills and ridge lines are important as are all views of the Santa Ynez Mountains from State Street. Yet the analysis of individual view points in this DEIR repeatedly states that these views are "not important".

H-15 On Page 4-19 the variables for determining if a view/view corridor has scenic value are limited to: Magnitude, Intactness and Distinctiveness. These are not the criteria the city has used before and we would submit are a very strange and truncated list of variables. Magnitude is defined as expressive, abundant or contiguous. What do these terms, specifically expressive or abundant, mean? The dictionary meaning of magnitude is greatness of size, of extent or importance, or size of measurable quantity. Where is the measurement?

H-16 Intactness is described as meaning "to what extent has the natural view been disturbed or compromised". Examples given are overhead utilities and telephone poles. We are dealing with an urban environment. Is the DEIR really saying that a telephone pole is enough to wipe out the scenic value? Wouldn't then every urban environment have no views?

H-17 Distinctiveness is defined as how unique or representative of the region is the view. Using the usual definitions of these words they are opposites.

H-18 This use of these three variables is reminiscent of the saying, "If you have seen one redwood you have seen them all". Taken to its logical conclusion, this short list of variables would seem to be saying that the only view/view corridor that has scenic quality is one that is abundant and contiguous, has no manmade intrusion and is both totally unique and representative. This makes no sense.

H-19 This appears to overlook the fact that both residents and tourists love Santa Barbara because of all its views despite limited intrusions to them. But then sensitivity to views and sensitivity to change or loss was never discussed in the DEIR, even though we had requested this.

H-20 When one gets to the analysis of the selected view points, the application of even the stated criteria is not systematic. Additional criteria, such as "snap shot" views and viewers ability to see behind themselves, suddenly show up in many of the one page assessments accompanying each of the view points.

H-21 Thresholds of Significance for visual impacts:
In the past visual analysis of this project, the City articulated a number of factors that they used to determine the threshold of significance. These do not appear in this document. Instead what appears are new Impact Significance criteria, which include: conflict with visual protection standards, conflict with scenic resource protection requirements or design criteria, or alter or obstruct existing public viewsheds from or across the project site by substantially blocking or substantially degrading important public scenic views or substantially impairing the visual context. What do these criteria mean? They are all subjective, there is no attempt to quantify them or explain how they are applied. Generally the word "conflict" means any contradiction. What does the word "substantially" mean? As a result of these blurred distinctions, these impact significance criteria are not and cannot be consistently applied.

H-22 What is missing is an objective measurement for determining and assessing impacts when view blockage changes the environment. When does change becomes significant or what is the threshold of significance? For example, how much of the views will be lost could be defined in

H-22 terms of percentages, then a determination made as to what percentage is significant.

H-23 Given that the existing baseline conditions are not adequately described, the selection of view points in incomplete, the analysis is contradictory and confusing, and thresholds of significance are missing, it is no wonder that the one page text accompanying each of the photo simulations is a jumbled mess with misapplied criteria, sudden introductions of new criteria and tortured conclusions. We have no choice but to request that the draft EIR be redone and recirculated.

Project Alternatives (Section 5.0):

H-24 Because the DEIR concludes that the project will have no significant impact on views, a conclusion that is highly questionable, no alternatives are included. However, the DEIR on page ES-7 states that "Further design refinements may be considered by City decisionmakers in order to reduce the size, bulk and scale of some portions of the buildings in order to provide a greater sense of visual openness in the project area which would potentially result in a higher level of neighborhood compatibility". It then proceeds to list design changes which may be considered, such as reducing the third story elements etc. This list of items is specifically what we and the public had wanted to see discussed and pictorially illustrated in the EIR as alternatives. Several of the Planning Commissioners also expressed interest in this. Simulations of what these potential changes would look like would be tremendously helpful for all concerned in light of the diverse and significant impacts. Leaving alternatives out means that there is no opportunity for all to review them. These would be especially helpful in reviewing the project's land use and design merits and in making the necessary findings relating to the Coastal Act and the LCP and the findings regarding compatibility.

H-25 Another item that should come under this section are illustrations of what the proposed project would look like:

1. with the existing sidewalks and existing State Street
2. with all of the legally required setbacks
3. with the wider sidewalks and narrower street
4. with expanded sidewalks as a result of pushing the project back beyond the required setbacks.

The discussion should include not only a description of these options, but an analysis of the pros and cons of each including, but not limited to, the effect on views.

Substantial Evidence Requiring Subsequent Environmental Review:

H-26 Substantial evidence of changed circumstances, necessity for changes to the project and new information on significant impacts regarding Mission Creek, Traffic and Circulation and Loss of Low-cost Visitor Serving Accommodations all require additional environmental review. These items should be addressed.

Sincerely,

Catherine McCammon

Citizens Planning Association, March 23, 2001

H-1. Please see responses to comments below regarding specific concerns with the adequacy of the environmental analysis in the EIR. As required by CEQA an EIR consultant serves as the extension of City staff. Unlike natural sciences such as, geology, hydrology, or risk of upset, the evaluation of visual resources is qualitative in nature. The photographic simulations were prepared by an expert to be used in the assessment of impacts on important public scenic views. Both City staff, and EIR consultants have extensive qualifications and experience with the evaluation of potential impacts on this resource. Preparation of the DEIR and use of consultant assistance was accomplished in accordance with specific direction of the State CEQA Guidelines with respect to lead agency responsibility, as follows: Section 15084 (e): "Before using a draft prepared by another person, the lead agency preparing the Draft EIR shall submit the draft to the agency's own review and analysis. The draft EIR which is sent out for public review must reflect the independent judgment of the lead agency. The lead agency is responsible for the adequacy and objectivity of the draft EIR.

H-2. The City considered all comments received during public scoping.

H-3. As noted in response to comments A-2, the Santa Barbara Superior Court determined issues adequately addressed by the prior Second Revised MND, and specified that the EIR scope be limited to public view impacts. No substantial evidence of new significant impacts was submitted which would warrant inclusion in the EIR scope or require additional environmental documentation pursuant to CEQA Guidelines section 15162. Comments and opinion regarding impact conclusions are noted.

H-4. Please see response to comments on letter F (Environmental Defense Center) and G (Headley and Associates).

H-5. The requirement for inclusion of an initial policy consistency analysis within an EIR is specified in the State CEQA Guidelines Section 15125, Environmental Setting, as follows:

(d) The EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans. Such regional plans include, but are not limited to ... regional land use plans for the protection of the coastal zone ...."

The EIR has provided the required policy consistency analysis in accordance with CEQA. Ordinarily, this initial policy analysis in an EIR is prepared by Lead Agency staff only, with the understanding that final determination of project consistency or inconsistency would be determined at a later point by the Lead Agency decisionmaker. In this case, the Entrada project has already been evaluated for project consistency by the actual project decisionmakers, including the City Historic Landmarks Commission, Planning Commission, and City Council. These consistency analyses included consideration and evaluation of project impacts on public views as provided in the prior CEQA analyses. The new CEQA

EIR analysis re-reviewed the public view impacts and provides more extensive documentation of the analysis, which confirms the earlier conclusions of no significant adverse impacts. This also further confirms the earlier policy consistency analysis of decisionmakers.

As stated in section 3.4, in approving the Second Revised MND, the City Planning Commission and the City Council found the project consistent with applicable public view protection goals, the CCA, LCP WADG, WAAC, and policies contained in General Plan Conservation Element Policy 3.0 and Scenic Highways Element, and Visioning Report Theme IA, and applicable Action Steps and Implementing Options and this approval was validated by a Superior Court judgment. Please see response to comment F-4 and F-7. The findings of the EIR are consistent with determinations of proposed project consistency with state and City plans and policy of the Second Revised MND.

H-6. The EIR emphasizes analysis of blockage of mountain views. Views of the Santa Ynez Mountains are discussed in the Chapter 3.0, Land Use and Policy Considerations, in section 4.1, Existing Setting, section 4.2, Existing Public Views Plans and Policies, and section 4.3, Analytic Methodology (see specifically the 4th bullet, section 4.3.1.1 first bullet, and impact significance criteria in section 4.3.2.1), and section 4.4, Project Setting and Impact Analysis.

H-7. Please see section 4.4.1 for a discussion of the selection of public viewpoints. . The viewpoints were not arbitrarily selected, but were identified as representative viewpoints and based on stated factors including the following: (1) Some views were consistent with viewpoints that had been selected for analysis during the preparation and consideration of the previous Second Revised Mitigated Negative Declaration (MND), since continuity in analysis between the MND and the EIR was considered appropriate. (2) Additional viewpoints were added in the EIR analysis based on comments received during scoping. (3) Additional viewpoints were added in the EIR analysis based on comments received from decisionmakers. (4) Additional viewpoints were selected to represent important locations along the Waterfront and lower State Street highlighted in City plans and policies. Please also see response to comment H-1 regarding expertise and responsibility of City staff in preparing the DEIR. The conclusion about project impacts was not based on "weighting" of various viewpoints.

H-8. Please see section 4.1, Existing Setting for a presentation of the baseline visual conditions. The existing setting discussion is limited to that area of the Waterfront and lower State Street that would be potentially impacted by the project and that provides a context for this evaluation. Views of the Santa Ynez Mountains from lower State Street are addressed in section 4.1.1.3. The existing visual character of the area is also described as a part of section 4.4, Project Setting and Impacts, which characterizes and evaluates existing views and identifies project impacts.

H-9. The area of State Street north of US 101 would not be impacted by the proposed project. It is discussed, however, at the end of section 4.1.1 in the Regional Existing Setting. Lower State Street is appropriately characterized as a component of the

urban corridor extending from the Waterfront to the commercial center north of Ortega Street. The discussion of each representative viewpoint describes whether existing views include visibility of the Santa Ynez Mountains.

H-10. Please see section 4.1, Existing Setting and section 4.4, Project Setting and Impact Analysis for a presentation of the baseline visual conditions. The analysis addresses topographic features (e.g. Santa Ynez Mountains) identified in City LCP policies regarding protection of visual resources. La Cumbre Peak, Cathedral Peak, Arroyo Burro, and San Marcos Pass are not referenced in *any* existing City or state plans or policies as important public/visual resources, or as specifically requiring complete view protection from all viewpoints.

H-11. Please see section 4.1, Existing Setting and section 4.4, Project Setting and Impact Analysis for a presentation of the baseline visual conditions. The discussion presented provides a reasonable level of information to allow the reader to place the proposed project within a regional context. The "Existing Condition" photos for each viewpoint in section 4.4 generally provide additional photographic evidence of the existing condition in the project area. CEQA Section 15151 states that an EIR will provide a reasonable level of detail regarding the impacts of a project: " the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible...The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." The photographs and written description of the existing setting in the EIR fulfill this objective. The EIR uses a qualitative approach to describe and evaluate potential project impacts on public scenic views. There is no guidance in CEQA directing that this evaluation be quantitative.

H-12. Please see section 4.3.2.1 for the criteria used in evaluating the project-specific and contributions to cumulative impacts. The visual context of the project site, as identified in existing City plans and policies, is addressed in the impact assessment. Visual character and architectural compatibility will be considered by the City decisionmakers and the Historic Landmarks Commission with respect to the land use and design merits of this and other projects that may be proposed in the future.

H-13. Please see section 4.1, Existing Setting, which provides an overview of the existing visual setting, and section 4.4, Project Setting and Impact Analysis, which provides a detailed description of existing public views. The three criteria discussed are consistently addressed in evaluating existing conditions at all 19 viewpoints. Revisions to some of the text in section 4.4.1 has been added for clarification.

H-14. The criteria for evaluating the importance of public scenic views are clearly articulated and explanations are provided for their application to each viewpoint analysis. The EIR analysis uses the presence of important visual resources as defined in City plans and policies as one of several criteria for determining the importance of a public scenic view. Please see section 4.3.1 The comment confuses the concept of an important visual resource as defined in City policy, with other factors that together comprise an important public scenic view. Also, section 4.3.1.1 differentiates between "in general" important visual resources and those "specifically identified," as important visual resources.

H-15. The analytic methodology outlined in section 4.3.2.1 for determining potential project impacts on public scenic views is the standard City methodology, and is completely consistent and supported by City plans and policies as described and used in the Second Revised MND. The methodology provides more detailed explanation to clarify the general criteria stated in the MND. The criteria identified in this section are based directly on illustrations in the City's Local Coast Program Visual Resources Map (see Appendix C), and text from LCP Policy 9.1 (see section 3.2), Waterfront Area Aesthetic Criteria for New Development Assessment (see section 3.3), and the Waterfront Area Design Guidelines (see section 3.3). The methodology criteria reflect City adopted plans and policies related to the protection of public scenic views. The variables of magnitude, intactness, and distinctiveness are described in section 4.3.1.2, are based on national planning organizational concepts. The analysis used in this EIR is qualitative in nature, and is consistent with the approach and criteria used in prior City visual analyses. The individual text and photos provide descriptive explanation of the application of the factors considered in evaluating public view importance.

H-16. The comment is correct in that the regional setting of the proposed project is urban. The discussion of "intactness" identifies "constructed materials that impose an artificial view on the backdrop of the natural setting." Overhead utilities and telephone poles are examples of intrusions which may degrade intactness and scenic quality. This discussion is augmented to clarify the concept. Since the setting of lower State Street is urban, it is reasonable to expect that the intactness of many views from this area would have been compromised to some extent by existing development.

H-17. Please see section 4.3.1.2, The distinctiveness of a view is a commonly used criterion, as recommended by national planning organizations including the American Planning Association and the National Scenic Highway Program. "Representative" also refers to what extent a view includes important visual resources. A unique view would have a high level of distinctiveness, such as the present view of the Santa Ynez Mountains from the Dolphin Fountain. A view of the Santa Ynez Mountains from lower State Street that only contains portions of the foothills and ridgelines will not be as unique of a view featuring this important visual resource. A view that has "sweeping views of the Santa Ynez Mountains" will be considered more distinctive, and better represent views of this important visual resource.

H-18. The comment incorrectly assumes that an important public scenic view completely satisfies all criteria listed in section 4.3.1. The criteria provide guidance in qualitatively assessing the importance of public views on a case-by-case basis. Clearly, the State CEQA Guidelines references to scenic quality and scenic vistas and guidance on evaluating impacts, and the local Coastal Plan's Inventory of important views and policy language describing important visual resources, recognize that not *every view* from every location is considered an important environmental resource.

H-19. Please see response to comment H-18. The EIR considers and describes visual expectations as identified in existing City plans and policies that define existing visual characteristics of the Waterfront. Existing plans and policies reflect "community values" regarding important public scenic views. The proposed variable "sensitivity" is not subject to description or relative

weighting in any meaningful or useful manner. The "sensitivity" of the public to impacts on visual resources is one of complete personal subjectivity and in the view of the Lead Agency, does not assist in reasonably determining values of impact significance.

H-20. The "snapshot" concept and its limitations are explained in section 4.4 of the EIR. The use of panoramic views that are experienced from viewpoints selected in the EIR are used to illustrate the ability to experience the "visual context" of the Waterfront area as defined in the last significance criteria, footnote 3., in section 4.3.2.1. The EIR explains that Views 5 and 6 are taken from a "transition area" between the shoreline and more commercially developed land uses along lower State Street. The use of panorama views is necessary because the impact assessment on important public scenic views required a broader perspective beyond the "snapshot views" of Views 7, 8, and 9. Explanations of the application of stated evaluation criteria were methodically provided for each viewpoint analysis. The use of panoramic views that are experienced from viewpoints selected in the EIR are used to illustrate the ability to experience the larger visual context of the Waterfront area as defined in the last significance criteria, footnote 3., in section 4.3.2.1.

H-21. No new thresholds were used. The evaluation criteria used in this EIR are the same as those used in all City environment documents and the adopted Second Revised Mitigated Negative Declaration for the Entrada project. Additional detailed explanation of qualitative factors used in applying the general criteria was provided in this EIR for greater clarification. The evaluation criteria are consistent with guidance provided in CEQA Appendix G, Environmental Checklist Form for view impacts. This includes the following statements.

From Appendix G:

"Would the project:

a) Have a **substantial** adverse effect on a scenic vista?
b) **Substantially** damage scenic resources? and
c) **Substantially** degrade the existing visual character or quality of the site and its surroundings?
d) Create a new source of **substantial** light or glare which would adversely affect day or nighttime views in the area?" [emphasis added]

From this EIR:

The proposed project would represent a significant adverse impact to an important public scenic view if it would:

- Conflict with the applicable vista protection standards, scenic resource protection requirements, or design criteria of the City, or if it would alter or obstruct existing public viewsheds from or across the project site, including scenic features associated with designated scenic highways, by:

  1. Substantially degrading an important public scenic view;
  2. Substantially blocking an important public scenic view corridor; or
  3. Substantially impairing the visual context of the Waterfront area.

H-22. The analysis used in this EIR is qualitative in nature, with general criteria identified and descriptive explanation provided for factors and circumstances considered in applying the criteria in specific instances. Therefore, the comparison of important scenic views from the various representative viewpoints selected for analysis in the EIR is qualitative. The comment indicates a preference for a quantitative measure to determine significance. Inherent problems result with this preference in that any given percentage would not accurately reflect impact significance for the variety of individual circumstances.

There are a number of environmental impact categories including cultural resources, biological resources, and visual resources that are resistant to quantification because impact significance is based on a complex set of physical factors that may vary with the individual circumstances of each case. The State CEQA Guidelines recognizes this in Section 15064, as follows: "An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting."

H-23. Please see the above response to comments regarding existing baseline, selection of viewpoints, analysis, and threshold of significance. There is no justification for recirculation of the EIR, as there is no new "significant new information" as defined in CEQA section 15088.5 that has been presented since the circulation of the draft EIR. The EIR has been revised in places to clarify the discussion and significance findings. As stated in CEQA Section 15088.5(b), "Recirculation is not required where new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

H-24. No potentially significant adverse impacts on public views were identified in this EIR. Therefore, no analysis of project alternatives is required to reduce impacts on public scenic views. City decisionmakers may determine that additional project modifications are needed to find the proposal consistent with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and with the City's Local Coastal Program policies. The Areas of Known Controversy and Issues to be Resolved address land use, planning, and design considerations beyond possible the environmental impacts identified under CEQA. The issues will be considered by decisionmakers and City staff during future public hearings. The EIR provides facts to support decisionmaker findings, but does not preclude the Planning Commission or the City Council from additional project considerations.

H-25. This comment will be forwarded to City decisionmakers for consideration during future public hearings. Analysis of the project reductions suggested is not required to reduce significant adverse environmental impacts, and therefore is not considered in the EIR.

H-26. The scope of the EIR has been determined by the Santa Barbara Superior Court as focusing exclusively on public scenic views. CEQA requires additional environmental review (section 15162) only when new information is identified that would result in a previously undisclosed significant impact, or identification of a significant impact that was not previously identified as significant.

Responses to issues raised by the commentor that are not subject to further environmental review are provided below:

Tsunami Planning Issue

The commentor alleges that new information of substantial importance, which was not known at the time the Second Revision to the Initial Study was approved, regarding tsunamis and their potential to result in significant impacts must be analyzed in the EIR.

The Second Revision to the Initial Study (Pages 19 and 20) analyzed the potential for the Entrada project to result in or expose people to tsunamis and determined that no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project. The Entrada project is located at approximately 10 feet above mean sea level (MSL) and according to the City's Master Environmental Assessment maps is within the tsunami run-up area. Because the City requires buildings to be constructed to the Uniform Building Code (to withstand 100-year events) and because adequate evacuation plans are in place for the Waterfront area, no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project.

Since the preparation of the Second Revision to the Initial Study and adoption of the Entrada project's Mitigated Negative Declaration (August 1999), new information regarding tsunamis has been published. The California Office of Emergency Services has prepared tsunami inundation maps which estimate the run-up from a worst-case tsunami (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously). The California OES recognizes that its tsunami maps are not particularly useful for land planning, since the assumptions used to prepare the OES map (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously) exceed the design criteria for all development except nuclear facilities. The California OES has also produced the Local Planning Guidance on Tsunami Response (no date). The purpose of this document is to, "...assist local governments in the initial development of a tsunami response plans and the procedures necessary to deal with a tsunami's impact on their communities."

Neither the OES tsunami inundation maps nor the document Local Planning Guidance on Tsunami Response have identified new information of substantial importance that will result in new significant environmental effects which were not discussed in the Second Revision to the Initial Study.

In addition, the report Seismic Sea Wave (Tsunami) Potential, dated March 28, 2001 prepared by Michael Hoover, Consulting Geologist-Hydrologist (see Appendix G), evaluated the effects of a locally generated tsunami resulting from a maximum earthquake. Such an earthquake (Magnitude 7.4) could cause a wave height of nine to twelve feet and result in the Entrada project experiencing minor flooding. If such an earthquake occurred at high tide (likely recurrence frequency of 600 years) it could result in the Entrada project experiencing significant flooding, but that the structures would not be destroyed and because they are proposed to be built of steel, could be used as evacuation facilities.

The Seismic Sea Wave (Tsunami) Potential also evaluated evacuation of the Waterfront relative to tsunamis. Distant source tsunamis result in relatively small (1 to 5.5 feet) waves in Santa Barbara, and lengthy warning times (usually hours) providing ample evacuation time. An earthquake locally of sufficient Magnitude to generate a significant tsunami would likely also cause collateral damage to roads, liquefaction, slope failures, bridge failures, and scattering of building debris on roadways such that evacuation from the Waterfront via automobile would be impossible. Evacuation from the Waterfront area would be via foot to higher ground (i.e. to the top of the Santa Barbara City College stadium). No change in evacuation conditions would result from reducing the number of vehicle traffic lanes on State Street. Due to the low probability of tsunami occurrences and limited scope of the project, no significant impact would result from exposure of persons to tsunami risk.

Mission Creek

The commentor asserts that there is new information of substantial importance that was not known at the time the Second Revision to the Initial Study was approved regarding the proposed Lower Mission Creek Flood Control Project and its potential, together with the Entrada project, to result in significant impacts on the Mission Creek environment, thereby impacting the water environment, riparian habitat and sensitive species within the creek.

The Second Revision to the Initial Study (Pages 21 and 44) indicated that the proposed project will not have a significant impact on the natural communities or wetland habitats within Mission Creek, nor will changes to the drainage flow of Mission Creek occur as a result of the proposed project.

At the time the Second Revision to the Initial Study was prepared and approved (August 1999), the preferred plan for the proposed Lower Mission Creek Flood Control Project was not known. However, in anticipation of changes to the Mission

Creek stream channel, in conjunction with the proposed Lower Mission Creek Flood Control Project, the Entrada de Santa Barbara Conditions of Approval contained in City Council Resolution No. 99-098 contain Condition G.13 which states:

G. Prior to issuance of demolition, grading or building permit for the proposed project:

13. The applicant shall review construction requirements with the Public Works Department to ensure that the development on Site A is consistent with approved plans for the improvement of Mission Creek at the time of project construction on Site A to the extent feasible. The Owner shall make all feasible changes to the plans as reasonably required by the Public Works Department. Costs for plan revisions shall be borne by the applicant.

In September 2000, the US Army Corps of Engineers released the Feasibility Report, together proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project. The recommended plan according to the Feasibility Report is Alternative 12. Appendix H shows Area A in this alternative as previously approved with the existing alignment and the proposed Alternative 12 alignment of Lower Mission Creek superimposed. As indicated on this Mission Creek Alignment alternative, if the Alternative 12 alignment of Lower Mission Creek is ultimately approved the proposed buildings on Area A (as previously approved) would be at the top-of-bank of Lower Mission Creek. However, as also indicated on this plan, Alternative 12 includes the demolition of buildings adjacent to the portion of the building on Area A closest to Mission Creek. In addition, a habitat restoration area is proposed between the west elevation of the building on Area A and the proposed top-of-bank of the Lower Mission Creek. According to the proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project, these components of Alternative 12 were found to offset any impact resulting from the building on Area A encroaching within the required 25 foot setback from the top-of-bank of Lower Mission Creek.

The Lower Mission Creek Flood Control Project has yet to be considered for approval, its final design has not been determined and remains unknown at this time. In addition, the staff recommendation for consideration of the Entrada project on its land use and design merits would include a condition similar to, if not exactly the same wording as, City Council Resolution No. 99-098, Condition G.13 described above.

Therefore, while the Lower Mission Creek Flood Control Project proposed alignment has been further refined since preparation of the Second Revision to the Initial Study, this additional information will not result in new or substantially more severe significant environmental effects which were not discussed in the Second Revision to the Initial Study.

Project Trip Generation

The traffic report prepared by Kaku Associates in 1998 used the City of Santa Barbara's approved methodology for investigating the impacts of a new project when that new project would replace existing buildings/land uses on the site. That methodology is as follows:

a. The size and zoning of the existing on-site land uses are summarized. If the on-site buildings are vacant, but could be occupied again without any new discretionary approval from the City, then the building size and land use are added to the on-site total for existing conditions.

b. The trip generation for the existing on-site buildings/land uses is calculated using a reference source approved by the City. In most cases, the Institute of Transportation Engineers *Trip Generation Manual, Sixth Edition* will be used as the City's reference of choice.

c. The same trip generation reference will be used to calculate the trip generation of the proposed land uses on site.

d. In some cases, the trip generation rates found in the *Trip Generation Manual* will be adjusted to reflect conditions at the site. Any adjustments to the standard trip generation rates must be approved by the City.

e. The two trip generation studies described above are compared and the difference in trips is considered to be the net trip generation effect of the proposed project. The traffic impacts of the proposed project are identified based on this net trip generation.

The trip generation comparison included in the Urban Crossroads letter ignores two factors in the above methodology – the definition of on-site land uses and trip reductions.

On-Site Land Uses

The City assumes that if a building can be re-occupied without any additional discretionary approval from the City, it should be counted as "existing square footage," even if it happens to be temporarily vacant at the time of the study. CEQA case law was presented during the Planning Commission and City Council deliberations on this project that supported the City's interpretation of the definition of "existing on-site land use."

Thus the Urban Crossroads study is incorrect in its definition of the amount of land use on site today. Therefore, the Urban Crossroads study underestimates the trip generation of the existing on-site land uses.

Trip Reductions

The trip generation rates used in the Urban Crossroads traffic study were based on the data found in the *Trip Generation Manual* as required by the City. The *Trip Generation Manual* represents a collection of trip rates from across the United States – most of which reflect suburban, single-use projects that experience little transit or walk-in patronage. Indeed, the data

collected for the *Trip Generation Manual* is intended to document the peak automobile generation of each individual land use and, typically, the suburban projects do just that.

However, many projects in Santa Barbara do not behave as single-use suburban developments, and therefore it is appropriate and more accurate to adjust the trip generation rates accordingly. For example, commercial projects along the oceanfront have traditionally received a 25 percent reduction from suburban rates to reflect the pedestrian nature of the State Street/Cabrillo Boulevard corridors.

Visitor-serving projects along State Street and Cabrillo Boulevard corridors are well served by transit and shuttle service, and it is appropriate to assume that the well-utilized shuttle system would serve hotel and retail land uses along these corridors. Again, the suburban trip generation rates found in the *Trip Generation Manual* would not reflect the service offered by the State Street shuttle.

Finally, the Urban Land Institute in its publication *Shared Parking* documented that visitors to a mixed-use project tend to visit more than one land use in the project during a single visit. This capture of multiple trips tends to reduce both the number of trips and the parking requirements of mixed-use projects. Multiple visits in the range of 20-70 percent were found in the ULI study.

The first two trip reduction factors above (walk-in and shuttle) would apply to both the existing and proposed land uses while the third (mixed-use project) would only apply to the proposed project.

The trip reductions applied by Kaku Associates were approved by the City Transportation Division staff prior to their use in the study. They are reasonable and conservative. No additional trip reduction was taken for the mixed-use aspect of the project, and the walk-in and transit reductions are consistent with reductions approved by the City for other projects in the area.

The Urban Crossroads analysis used the incorrect definition of existing on-site land uses and it failed to take into account legitimate and well-documented trip reductions. Therefore, the Urban Crossroads analysis incorrectly underestimates the number of existing trips and overestimates the number of trips from the new project. The City believes that the trip generation estimate in the Kaku Associates report reflects a more accurate estimate of the net trip generation of the proposed project. Given this, we do not agree with the Urban Crossroads conclusion that the project would impact the intersection of Garden Street/US 101 northbound ramp.

Traffic Signals Warrants

We agree with the statements in the Urban Crossroads letter regarding traffic signal warrants. The City believes that the traffic and pedestrian activity generated by the new project would warrant a new traffic signal at Mason Street/State Street, and therefore a warrant analysis was not required.

When the warrant is met, the signal (and any other warranted signal on Cabrillo Boulevard) would be installed consistent with the City's ability to fund the installation. In the case of the proposed project, the Mason Street/State Street signalization would be a recommended condition of the project and therefore would be installed consistent with warrants.

Pedestrian Crossings of State and Mason Streets

We concur with the comments of Urban Crossroads. Additional pedestrian crossings of both State Street and Mason Street would be generated by the project and the intersection and mid-block crosswalks proposed by the project are intended to accommodate the increased activity. As pointed out by Urban Crossroads, the crosswalks are typical treatments in urban areas.

This page intentionally left blank.

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse

Gray Davis
GOVERNOR

Steve Nissen
DIRECTOR

March 23, 2001

Debra Andaloro
City of Santa Barbara
630 Garden Street
P.O. Box 1990
Santa Barbara, CA 93101

Subject: Entrada de Santa Barbara
SCH#: 1999011045

Dear Debra Andaloro:

I-1 The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on March 22, 2001, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Senior Planner, State Clearinghouse

RECEIVED

MAR 26 2001

CITY OF SANTA BARBARA
PLANNING DIVISION

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
916-445-0613 FAX 916-323-3018 WWW.OPR.CA.GOV/CLEARINGHOUSE.HTML

Document Details Report
State Clearinghouse Data Base

SCH# 1999011045
Project Title Entrada de Santa Barbara
Lead Agency Santa Barbara, City of

Type EIR Draft EIR
Description The proposed project involves the redevelopment of three major blocks of properties at the intersection of State Street and Mason Street with a total of 17,532 square feet of commercial retail uses and 81 vacation ownership units.

Lead Agency Contact

Name Debra Andaloro
Agency City of Santa Barbara
Phone 805/564-5470 **Fax** 805-897-1904
email
Address 630 Garden Street
P.O. Box 1990
City Santa Barbara **State** CA **Zip** 93101

Project Location

County Santa Barbara
City Santa Barbara
Region
Cross Streets State Street/Mason Street
Parcel No. 033-102-004,014;033-111-001,002,003;033-081-003,004,005,010, 011; 033-010-004
Township **Range** **Section** **Base**

Proximity to:

Highways 144 & 225
Airports
Railways UPRR
Waterways Pacific Ocean, Mission Creek, Sycamore Creek, and Laguna Channel
Schools Santa Barbara Schools District and Santa Barbara City College
Land Use Mixed commercial, hotel, and industrial uses
Zoning: Hotel and Related Commerce (HRC II)
General Plan Use: General Commercial-Buffer

Project Issues Aesthetic/Visual

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; California Highway Patrol; Caltrans, District 5; Department of Housing and Community Development; Regional Water Quality Control Board, Region 3; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received 02/06/2001 **Start of Review** 02/06/2001 **End of Review** 03/22/2001

Note: Blanks in data fields result from insufficient information provided by lead agency.

Governor's Office of Planning and Research, State Clearinghouse, March 23, 2001

I-1. The comment is noted.

J-1 I am definitely against the Entrada Project.
It will be the finish of what's left of Santa Barbara — and only a place for the wealthy in the Condos.
Lorraine C Rollin

To comply with the judgement of the Court, the City of Santa Barbara has prepared a Draft Environmental Impact Report (EIR) focused on public view impacts for the Entrada project. The Draft EIR is now available for review and comment. The Draft EIR concludes that the Entrada project would result in adverse but not significant impacts to public views. Project design changes are identified as recommended mitigation measures to further reduce adverse but not significant impacts to public views.

CITY OF SANTA BARBARA
COMMUNITY DEVELOPMENT DEPARTMENT
PLANNING DIVISION
POST OFFICE BOX 1990
SANTA BARBARA, CA 93102-1990

Lorraine C. Rollin
296 N. Hope Ave, Spc. 71
Santa Barbara, CA 93110

AN IMPORTANT NOTICE
CONCERNING YOUR NEIGHBORHOOD

Lorraine C. Rollin, No Date

J-1. Thank you for your comment. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Mariette Risley
1428 Cliff Drive, No. 1
Santa Barbara, California 93109

FEB 09 2001
CITY OF SANTA
PLANNING DIVISION

2/5/01

Planning Division
630 Garden St.
Santa Barbara, California

Hello-

First, I'll admit that reading and understanding correctly the draft environmental impact review is a bit beyond my mind, logical as that mind is.

However, please accept my input as a citizen of Santa Barbara, concerned with keeping Santa Barbara beautiful.

K-1 I find the idea of allowing three-story buildings, which obviously both

K-1 ↑ ruins, protected under state law, to be totally unacceptable. The big new motel on Cabrillo near State Street already blocks some views. And the new Ralph's on de la Vina and Carrillo blocks views

K-2

K-3

Enough!

K-4 Please do not accept or allow any more damage to be done to a beautiful city. If Mr. Levy says it will bring dollars- do we really care that much? Can we really be bought?

Sincerely

Mariette Risley

Mariette Risley, February 5, 2001

K-1. No state law exists that specifically disallows the ability to develop three-story structures that could potentially block views. The proposed Entrada project is consistent with zoning for building height.

The requirement for inclusion of an initial policy consistency analysis within an EIR is specified in the State CEQA Guidelines Section 15125, Environmental Setting, as follows:

(d) The EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans. Such regional plans include, but are not limited to... regional land use plans for the protection of the coastal zone ..."

The EIR has provided the required policy consistency analysis in accordance with CEQA. Ordinarily, this initial policy analysis in an EIR is prepared by Lead Agency staff only, with the understanding that final determination of project consistency or inconsistency would be determined at a later point by the Lead Agency decisionmaker. In this case, the Entrada project has already been evaluated for project consistency by the actual project decisionmakers, including the City Historic Landmarks Commission, Planning Commission, and City Council. These consistency analyses included consideration and evaluation of project impacts on public views as provided in the prior CEQA analyses. The new CEQA EIR analysis re-reviewed the public view impacts and provides more extensive documentation of the analysis, which confirms the earlier conclusions of no significant adverse impacts. This also further confirms the earlier policy consistency analysis of decisionmakers.

As stated in section 3.4, in approving the Second Revised MND, the City Planning Commission and the City Council found the project consistent with applicable public view protection goals, the CCA, LCP WADG, WAAC, and policies contained in General Plan Conservation Element Policy 3.0 and Scenic Highways Element, and Visioning Report Theme IA, and applicable Action Steps and Implementing Options and this approval was validated by a Superior Court judgment. Please see response to comment F-4 and F-7. The findings of the EIR are consistent with determinations of proposed project consistency with state and City plans and policy of the Second Revised MND.

Your comment will be forwarded to the decisionmakers for consideration during their review of the project.

K-2. The project referenced is considered in the cumulative impacts discussion as Project No. 11. The proposed Entrada project's contribution to cumulative impacts, combined with projects such as the Harbor View expansion, is discussed in section 4.6.

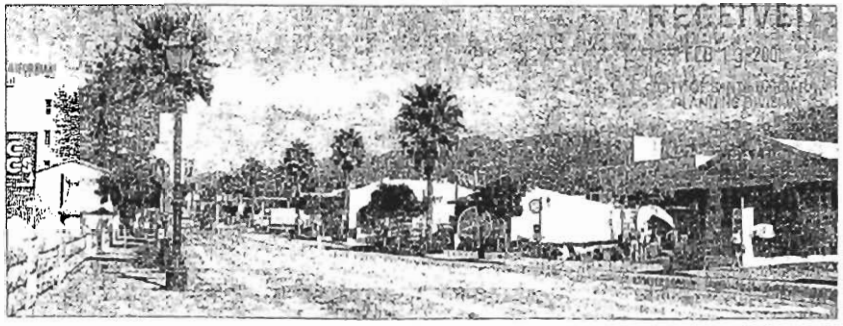
K-3. The proposed Ralph's supermarket is not considered in section 4.6 cumulative analysis as it would not combine with other future probable projects to obstruct views of the Santa Ynez Mountains from the Waterfront or lower State Street.

K-4. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

This page intentionally left blank.

Levy hopes to complete project by fall 2002

RECEIVED
FEB 19 2001



Top, the existing view from the Mission Creek Bridge on State Street provides a panorama of the Santa Ynez Mountains. Above, a computer-generated image of the the proposed project, without landscaping, cuts off part of the mountain view.

L-1

To The Planning Commission
The article stated that developers were happy that the view was not compromised. Personally I think it is completely compromising. Please recommend they lower the development so we can still see our beautiful mountains! Karen Scrapansky

F.Y.I.

Anyone who wishes to review the city's new study of how the La Entrada de Santa Barbara project would affect public views near the downtown waterfront can contact the city Planning Division, 630 Garden St. For more information, call 564-5470.

Public comment on that study, a draft environmental impact review, will be taken through March 23. Additional copies of the report are available at the Santa Barbara Public Library's Central Branch, 40 E. Anapamu St.

A public hearing on the study is scheduled before the city Planning Commission March 15 at City Hall. The commission, which helps steer local development, regularly meets a 1 p.m.

Collected comments, and responses, will be included in a final version of the study.

Karen Schapansky, No Date

L-1. The comment does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Andaloro, Debra

From: Larry Crandell [LarryCrandell@mcadams.com]
Sent: Sunday, February 18, 2001 2:18 PM
To: dandaloro@ci.santa-barbara.ca.us
Subject: Entrada Draft EIR

Dear Debra Andaloro,

I believe the Entrada project will be a great benefit to Santa Barbarans and visitors.

The carefully crafted design not only meets all zoning rules and regulations, it also accomodates
many additional concerns and would take a sad, blighted area and turn it into something that
we can all enjoy and be proud of. The design is elegant, even opponents say its beautiful.

We have a rich Spanish legacy in our town, and we have the opportunity to build on it with a
project that would allow anyone the opportunity to "dar un paseo" or take a stroll thru its
lovely surroundings. It continues the pedistrian friendly program the city has promoted.

M-1

Those who oppose the project on the grounds that it is an outsized project that would take
away the mountain view, would also have opposed the following treasures:

1) El Paseo
2) The Mission
3) Museum of Art
4) The Biltmore
5) Trinity Episcopal Church

Entrada is the same size or smaller and is most definitely "Santa Barbara Style"

It will give tremendous support to local small business and local arts programs as well as support local schools.

Entrada has patiently progressed thru many refinements and now deserves to be built.

Sincerely,

Larry Crandell, Jr.

Larry Crandell, February 18, 2001

M-1. The comment does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

515 DREXEL DRIVE • SANTA BARBARA, CALIFORNIA 93103

Feb. 23, 2001

City of Santa Barbara
Planning Division
Attn: Debra Andaloro.

Dear Planning Commissioners:

N-1 Please register my strong protest, as a devoted citizen of S.B. since 1973, to the present "Entrada Project" for the 3 blocks of lower State Stret.

1) the Project will indeed destroy our views of the mountains from this most important & pivotal area of the city.

N-2 2) the Project will encroach upon local citizens' ~~view~~ use & enjoyment of this prized area by offering 162 new transient lodging units to more & more tourists.

N-3 3) the Project, by restricting traffic lanes will obstruct citizens' use of State & Cavillo streets as important connecting links between their residences, business, & recreation areas.

N-4 4) the Project, when & if built, will obviously curtail citizens' long-range & much needed planning for the protection of creeks & marshy waters feeding & often polluting our beach & ocean at Mission Creek.

next page →

N-5 5) the Project promises to further the growing image of Santa Barbara as a "MECCA TOURIST CENTER" instead of as the vibrant, healthy, well balanced community serving first its citizens while welcoming a reasonable, but not dominant tourism.

Thank you for your serious attention to my views.

Rosemary J. White

Rosemary White, February 23, 2001

N-1. The commentor's opinion about view impacts is acknowledged. The comment does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

N-2. This comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

N-3. Please see response to comment N-2. Although the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500 foot long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing does not reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free flow roadway capacity changes from approximately 2,800 to 1,400 vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the

intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when lots of pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at LOS B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

N-4. Please see response to comment A-2. In addition, the following information addresses issues regarding Mission Creek that are beyond the scope of the current EIR.

The Second Revision to the Entrada project Initial Study (Pages 21 and 44) indicated that the proposed project will not have a significant impact on the natural communities or wetland habitats within Mission Creek, nor will changes to the drainage flow of Mission Creek occur as a result of the proposed project.

At the time the Second Revision to the Initial Study was prepared and approved (August 1999), the preferred plan for the proposed Lower Mission Creek Flood Control Project was not known. However, in anticipation of changes to the Mission Creek stream channel, in conjunction with the proposed Lower Mission Creek Flood Control Project, the Entrada de Santa Barbara Conditions of Approval contained in City Council Resolution No. 99-098 contain Condition G.13 which states:

G. Prior to issuance of demolition, grading or building permit for the proposed project:

13. The applicant shall review construction requirements with the Public Works Department to ensure that the development on Site A is consistent with approved plans for the improvement of Mission Creek at the time of project construction on Site A to the extent feasible. The Owner shall make all feasible changes to the plans as reasonably required by the Public Works Department. Costs for plan revisions shall be borne by the applicant.

In September 2000, the US Army Corps of Engineers released the Feasibility Report, together proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project. The recommended plan according to the Feasibility Report is Alternative 12. Appendix H shows Area A in this alternative as previously approved with the existing alignment and the proposed Alternative 12 alignment of Lower Mission Creek superimposed. As indicated on this Mission Creek Alignment alternative, if the Alternative 12 alignment of Lower Mission Creek is ultimately approved the proposed buildings on Area A (as

previously approved) would be at the top-of-bank of Lower Mission Creek. However, as also indicated on this plan, Alternative 12 includes the demolition of buildings adjacent to the portion of the building on Area A closest to Mission Creek. In addition, a habitat restoration area is proposed between the west elevation of the building on Area A and the proposed top-of-bank of the Lower Mission Creek. According to the proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project, these components of Alternative 12 were found to offset any impact resulting from the building on Area A encroaching within the required 25 foot setback from the top-of-bank of Lower Mission Creek.

The Lower Mission Creek Flood Control Project has yet to be considered for approval, its final design has not been determined and remains unknown at this time. In addition, the staff recommendation for consideration of the Entrada project on its land use and design merits would include a condition similar to, if not exactly the same wording as, City Council Resolution No. 99-098, Condition G.13 described above.

Therefore, while the Lower Mission Creek Flood Control Project proposed alignment has been further refined since preparation of the Second Revision to the Initial Study, this additional information will not result in new or substantially more severe significant environmental effects which were not discussed in the Second Revision to the Initial Study.

N-5. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

FEB 26 2001

23 February 2001

City of Santa Barbara
Planning Division
Attn. Debra Andaloro, Project Planner

Re: Entrada De Santa Barbara Project

O-1 I have followed the Entrada Project for some time as it has wended its' way through the review process and feel the project is not properly placed in its' proposed location. The recent computer simulation of the effect on mountain views displayed in the Santa Barbara News-Press demonstrates that the third story effectively blocks the mountain ridge line from view and I do not agree that this is a negligible loss. As is noted in the name of the project, the project is located at the entrance to the core center of Santa Barbara

O-2 and mountain views from a proximity to the beach are an important part of the appeal to residents and visitors alike. The importance of this should not be dismissed lightly.

O-3 We often hear of the trying nature of the review process from those who propose projects and may harbour disappointment when approval is not granted; however, in situations such as this one, I feel that the huge financial resources at the disposal of the developer has overwhelmed the regulatory mechanism of the city. One has only to look at the exemptions and modifications already agreed to as listed in the hearing announcement such as an exemption from the required number of parking spaces, narrowing of State Street, designation of a portion of the project as "community Priority" under Measure E, a category intended for use in reasons of health, safety and cultural need, and the proposed realignment of on street parking to see some of the extent of the negotiations over deviations which have been considered. In the course of this fragmentation, the project bears a resemblance to the cow built by committee which resulted in a camel. Please consider the project in its' entirety and act to preserve the ridge top views.

Fred Keller
22 Canyon Acres Dr.
Santa Barbara, CA 93105

Fred Keller, February 23, 2001

O-1. The EIR concludes that the view blockage in View 6 would be adverse, but not a significant public view impact given the specific setting. Your opinion about view impacts will be forwarded to decisionmakers.

O-2. Please see section 4.2 for a discussion on relevant City plans and policies regarding the proposed Entrada project. The assessment of environmental impacts is consistent with these policies. Existing state and City plans and policies reflect community values relative to important public scenic views as described in the EIR. The criteria included in the EIR for determining important public scenic views and the level of impact on important public scenic views is based on these established community values.

O-3. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

WALTER E. HOPMANS
1538 ALAMEDA PADRE SERRA
SANTA BARBARA, CA 93103
PHONE (805) 963-1198

P-1

One aspect of Mr. Levy'$ La Entrada propo$al has been left out of the discussions: Will it be of benefit or be a negative thing for the majority of the people of our town ? To most of us it would be negative .Itwould mean narrowing already crowded sreets, more tourists crowding residents from recreational areas supported by their taxes, more souvenir shops, fewer untarnished views, and much harm to already established merchants on upper State Street . The majority of our town's people do not want "growth" and "development". We love our town for its ambience and not as a cash cow and tourist trap for a few already wealthy "developers". The city council is sworn to do what is best for all of us, not what is best for a few people whose only interest is personal profit, no matter how it might degrade the quality of life for others in this wonderful old town. If the project in question were put to a vote of approval by our citizens (and it should be) it would lose by a landslide ! I encourage everyone to sign the "Streets R Us" petition to have the matter voted upon and help keep Santa Barbara a great place to live !

Walt Hopmans

Walt Hopmans

RECEIVED
MAR 05 2001
CITY OF SAN
PLANNING DIVISION

Walter E. Hopmans, March 5, 2001

P-1. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

To: Debra Andaloro, Project Planner
Community Development Department
City of Santa Barbara, California

From: Nyle G. Utterback
718 Willowlglen Road
Santa Barbara, CA 93105

RECEIVED
MAR 02 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Subject: Comments regarding the Draft EIR for the Entrada project dated February 2001 as a written submission.

This Draft Environmental Impact Report is not only inadequate, it is a sham and insult to the citizens of Santa Barbara. The Community Development Department, as the Lead Agency, has let all of us down, including the citizens, the Planning Commission and the City Council. In the process, it appears to have taken leave of all intellectual honesty in rationalizing a predetermined conclusion.

I was perhaps naïve to think that the Community Development Department would take this opportunity to produce an EIR which would give the decision makers the maximum information possible to make the best project possible, and would include alternatives such as the effects of eliminating the third stories for example. Instead, the Community Development Department has produced a defense of doing the absolute minimum that might stand up legally.

But considering how things are done in the real world, I should have known better, as the following items will explain:

Q-1

1. The City Council has already made the finding, while at the same time maintaining that no EIR is necessary, that the project before us will produce no significant adverse environmental impact on views.
2. The Planning Commission has already made the finding, while at the same time maintaining that no EIR is necessary, that the project before us will produce no significant adverse environmental impact on views.
3. The Planning Commission directs the staff of the Community Development Department, and has already made the finding, while at the same time maintaining that no EIR is necessary, that the project before us will produce no significant adverse environmental impact on views.
4. The City Council hires and fires the City Administrator.
5. The City Administrator hires and fires the Community Development Director.
6. A report from the Community Development Department staff to the Planning Commission admits that "...this project has placed considerable pressure on the City's development review process." Among these mostly political pressures listed were "...to approve a major project to demonstrate that the process does in fact work". (Staff report 3/25/99).

Q-1

7. The Community Development Director has already stated on the occasion of several public hearings that, even if produced, an EIR would produce no new information that would change things. This prediction has come true with a vengeance.
8. The Community Development Department is the Lead Agency for producing the EIR.
9. The City Council, sitting as the Redevelopment Agency, wants this project dearly and has become a co-applicant.
10. This project will result in a large tax increment for the Redevelopment Agency over a half million $ per year, which can be used for further development.
11. The Community Development Department sets the rules, OK's the criteria, gives the instructions, controls the purse strings, picks the contractors and produces this document.
12. If this document were to find any significant adverse environmental impact, it would be an embarrassment to the Community Development Director, because he has previously said the EIR would show nothing new, and this would show him wrong.
13. If this document were to find any significant adverse environmental impact, it would be an embarrassment to the Planning Commission, because the Commission has already found that this project will have no significant adverse effect on the environment
14. If this document were to find any significant adverse environmental impact, it would be an embarrassment to the City Council, because the Council has already found unanimously that this project will have no significant adverse effect on the environment. City Councils can't (or won't) be wrong.
15. See items 1, 4 and 5.
16. If this document were to find any significant adverse environmental impact, it would necessitate the study of, and inclusion of, design alternatives in addition to the "no build" alternative. This might show that eliminating the third story features would be a better alternative, for example.
17. If this document were to find any significant adverse environmental impact, it might mean that findings of "overriding considerations" would have to be made. Such findings might be hard to defend.

Considering these items in relation to the real world, is there any likelihood that this EIR would find any significant adverse environmental effects, particularly about effects which are subjective in nature and prone to weasel words? Whenever something comes even close to being considered significant, a deluge of rationalizations ensues, some of which are demonstrably incorrect and others comical in their absurdity. Someone (who and on what basis?) blithely concludes "but less than significant", a conclusion having huge significance. See items 16 and 17 above.

Q-2

Actually, over most of its bulk, this document does a good job in covering the issues that an EIR must legally cover. For example, it does an excellent job in making the case that City rules and policies consider views extremely important. In many parts of this draft EIR this is clearly brought out. Furthermore the technical aspects seem well done, so far as they go. The pictures and overlays are effective.

Q-3 The amazement is that even though this draft EIR emphasizes the great importance of views to Santa Barbara and shows graphics which on their face show significant adverse effects but for which governing bodies might find overriding considerations, it suddenly reaches far for rationalizations that conclude nothing is more than a Class III impact. Although criteria are given for determining what constitutes "important public scenic views" that make some sense, there is nothing in this EIR which describes how the conclusions were drawn to classify as to Class I, II or III impacts.

Q-4 Most of the significant issues which I have with this document can be summed up in the few sections which follow. Nineteen view points were considered in the View Analysis. Many of these could have been dispensed with (most persons would agree that if you can barely see the project from a viewpoint or are far enough away that it can hardly be seen, there is no significant impact). Does this mean that in the General Conclusion 4.5.1 "The conclusion of this EIR is based on the totality of 19 separate view and project analyses as described below under View Analysis and Impact Conclusions." some sort of average (totality) was taken over the 19 views? It is obvious that one can find an unlimited number of important view points in the City on which Entrada would have no effect. Just one view with a significant adverse impact is sufficient to produce a significant adverse impact in the EIR.

Viewpoint 6, or, Most people don't have eyes in the back of their head.

Q-5 The analysis of Viewpoint 6, just before the project at Mission creek on the west side of State Street going up from the pier, determines it to be an "important public scenic view". The graphics for View 6 show clearly that the "mostly intact Santa Ynez Mountain ridgeline" and below is lost due to the project. However the "analysis" concludes that "this is a less than significant impact on important public scenic views", with arguments based heavily on View 6a.

Q-6 View 6a is a panorama extending from up State Street toward the downtown to a view down State Street including the dolphin fountain. The assessment states "It is reasonable to assume, however, that a viewer would simultaneously look at Views 6 and 6a, with 6a having a higher degree of magnitude and intactness, and 6a being the more important and scenic view". It is of course impossible for a person to simultaneously look both up State Street from this position and down to see the dolphin fountain, unless that person has eyes also in the back of his head.

Q-7 This is like a person going into a museum which is known to have a fine painting, but who finds upon looking at the painting that someone has thrown a bucket of paint on it. But then the curator says "Not to worry. The loss is not significant, because if you just turn around, you will see an even finer painting on the wall behind you."

More problems with Viewpoint 6 analysis

Q-8 The contradiction in the "analysis" of Viewpoint 6 is remarkable. First, it is concluded that "View 6 is an important public scenic view." However the analysis then finds that

Q-8 the loss of this "important public scenic view" is not a significant adverse impact "on important scenic views". This is based on the idea that if one turns around, there is still another good view to be seen. This says plainly that the loss of an "important public scenic view" is not considered significant so long as there is a good view in the almost opposite direction.

Q-9 The "analysis" of View 6 is incomplete with regard to aspects that it does not mention. It is clear that the third story elements are what break the ridgeline in View 6 and have a large impact on the openness and open feeling. This is a perfect place to give the governing bodies an idea of what would happen if the third story elements were removed. This draft mentions in several places that the Commission and Council may make further changes to the project, including removing third story elements, but gives no basis or information as to what effect the changes might produce. This would be a proper place to point out how an "important public scenic view" could be saved. In fact, exactly this was specifically requested in my comments during the scoping process (see attached).

The cache 22 reasoning and rationalization is obvious here, in that such consideration of third story removal might constitute an alternative, but since the conclusion has already been made that the project has insignificant impact on View 6, such considerations of possibly lessening the impact are precluded. This is a major reason as to why this EIR must not, and will not, find any significant impact, no matter what.

Q-10 Regarding the "more important" View 6a, the "analysis" states "In View 6a, the sweep of the Santa Ynez Mountains is evident, abundant, and intact as it slides into the ocean further to the east." In fact one may see from 6a that the ridgeline and mountains seen in View 6 are much more intact and just as abundant. Unfortunately they are not sliding into the ocean.

Q-11 The statement is made that "...the view (View 6) is experienced for only a relatively short period of time", apparently implying that this lessens the importance of View 6. In fact, a person moseying up State Street enjoying the openness and views to the mountain ridgeline which presently exists as View 6 may spend a considerable time experiencing exactly this view, which will be destroyed by the third story elements of Entrada.

Q-12 The paragraph about View 6 being like looking through a "long narrow tube" is demonstrably wrong. A reasonable "long narrow tube" would show a field of view of a few degrees, far less than View 6 shows. View 6 shows a field of view of 68 degrees (Figure 4-33), which is far greater than the field of high visual acuity. Peripheral vision of course goes well beyond this, in which form and motion but not detail can be seen. This is another incorrect rationalization used in a reach to justify a finding of "less than significant impact".

Q-13 The same paragraph says that if a viewer "...only saw the isolated view represented by View 6, it would be possible to conclude that the Entrada project could cause a significant impact to this one particular important public scenic view." This is correct in spades. However this is brushed aside with the rationalization that the viewer would be

Q-13 more likely to look at View 6a, an impossibility without turning around, as discussed in the previous section.

Q-14 The final paragraph ends with the cryptic sentences "Observers at this viewpoint currently have views of lower State Street, a transition to the central business district along an urban corridor. The proposed development within this corridor would be consistent with this visual expectation." Clearly this Viewpoint 6 is not within, or even close to the downtown urban corridor. It is in an area of one and two story structures (as described in this very document) with wide open space containing the "important public scenic view" View 6. Entrada will of course bring the very different height, mass, bulk and scale of the downtown business corridor almost to the beach, a very big change from what is there now, and which has strong influence on the openness and visual quality of the area.

Q-15 The analyses of some of the other "public scenic views" provide similar rationalizations that may be questioned, but View 6 is the most egregious. For example, the analysis of View 10 totally ignores the huge impact of Entrada on the openness of the area, an important aspect of visual resources as discussed at length in Appendix A. View 10 clearly demonstrates the impact on openness due to Entrada's footprint, height and outline. A large part of the impact is due to the third story elements. In the interest of brevity, further comments on the other viewpoints will be skipped.

View Angle Analysis conclusion is incorrect, Appendix E

In the fourth paragraph of Appendix E, it is stated "Therefore, if a 16 foot 8 inch structure (a typical one-story commercial building in downtown Santa Barbara is 16 to 18 feet tall) were to be constructed in Area B or C of the Entrada site, with a 20-foot setback from the State Street property line, it would totally block the view of the Santa Ynez Mountains from the southwest sidewalk of State Street."

View 6, which is from that side of State Street, shows plainly that one can presently see the ridgeline of the Santa Ynez Mountains, and in fact even into the foothills, looking over TWO STORY buildings where the Entrada is proposed.

Q-16 This is particularly serious because, if a proper "view analysis" had been done for Viewpoint 6 and presented in this draft EIR, it would have been clear that the third story elements are the culprits in destroying "an important public scenic view", View 6.

There is a better statement of the intent in the text, where the word "adjacent" is included. I assume that really is intended to mean "directly across from", rather that "adjacent to". The view angle analysis in that context does show the importance of view corridors, which then should not even have one-story elements in the line of sight through the corridor.

However this does not excuse the lack of the view analysis for View 6. In fact, this was specifically requested in my comments during the scoping process (see attached).

Waterfront Area Aesthetic Criteria ignored, Appendix A

Q-17 The first paragraph states "The Locating New Development Section of the Local Coastal Plan (LCP) provides for protecting, maintaining and enhancing the visual qualities of the City's Waterfront Area by establishing criteria to evaluate the appropriate intensity of potential development. These criteria are(a) based on the visual resources which presently exist: openness; lack of congestion; naturalness; and rhythm. Policy 12.2 requires that the impact of new development be evaluated with respect to those resources."

Who better to make such evaluations than the view experts who have prepared this document?

It should be noted that "visual resources" as defined includes "openness, lack of congestion, naturalness and rhythm". However this EIR fails to give any evaluation of how Entrada will affect "openness, lack of congestion, naturalness and rhythm", which as visual resources must be included in an EIR evaluating "Views". Surely the expert authors of this draft EIR are competent to make such evaluations, and this is the appropriate place.

Q-18 Appendix A in fact already provides a matrix for this evaluation. Surely it is intended that this matrix be filled in, rather than just "establishing criteria". It is implied that it is only presented for use by decision makers. However, the decision makers are not as expert in these matters as view experts, which is why an EIR by experts is prepared. This matrix should be filled in by the experts and presented in the EIR, just as the analyses of Views 1-19. Then the decision makers can agree or disagree, just as they can do with the other conclusions made by the experts in this draft EIR. The lack of this aspect is sufficient to make this draft EIR severely inadequate.

The Waterfront Area New Development Evaluation Matrix follows as page 7. My previous comments for the EIR scoping are attached.

WATERFRONT AREA NEW DEVELOPMENT EVALUATION MATRIX

+ Means: Creates a Positive Effect
- Means: Creates a Negative Effect
0 Means: Neither a Positive or Negative Effect

DIMENSIONS		PARAMETERS		
		Protects	*Enhances*	*Restores*
Openness	Building Density, Scale and Mass			
	Functional Access			
	Land Use Patterns			
	Vegetation			
Lack of Congestion	Traffic Flow			
	Parking			
	Public Facilities Planning			
	Land Use Patterns			
Naturalness	Views			
	Public Aesthetics			
	Landscaping			
	Adjacency			
Rhythm	Diversity			
	Use Patterns			
	Design Details			

11 July 2000

To: Santa Barbara Planning Commission and Planning Staff
From: Nyle G. Utterback, 718 Willowglen Road, Santa Barbara 93105
Subject: Entrada Environmental Impact Report
Request: Please make this part of the official record on Entrada. (Also as requested by Planning Commissioners, please provide copies of this submission to the Commissioners as soon as possible.)

This submission speaks mostly to the scoping for the Environmental Impact Report to be prepared for the Entrada de Santa Barbara project. The focus will be on Visual Impacts, although some comments may be relevant as new information on other aspects, such as feel of openness and other esthetics.

Relevant excerpts from two documents will first be presented (with bolded emphasis) as background material for arguments to be presented later in this submission. The first will be from the City of Santa Barbara General Plan, Land Use Element, which has been adopted and endorsed through City Council actions as official City policy. The second is the Final Report and Recommendations from the Downtown/Waterfront Stakeholder Committee, the so-called "Vision". Also attached as an appendix is a City Council Agenda Report (5/15/98) from the Council's Ad-hoc Vision Subcommittee, which among other things recommends "Consider the adoption of the Final Report (the "Vision") as a "Vision Element" to the General Plan ....".

Although the full City Council declined to officially endorse the "Vision" document, and has not yet adopted it as part of the General Plan, the "Vision" remains a major source of current public input and concerns. The "Vision" process was instigated and fully sanctioned by the City Council, including the expenditure on the order of $250,000 of public funds and over a year of staff and citizen efforts. The Stakeholder Committee of 109 members was intended to, and indeed did, include a very broad cross-section of responsible citizens of widely divergent backgrounds, political viewpoints, talents, expertise and interests. It is most important to note that the Final Report of the Committee, including the detailed findings and recommendations in the main body, were accepted unanimously by all Stakeholder Committee members. Any individual could, and indeed did in some issues not finally included, object and have that objection recorded. It is furthermore important to note that the Stakeholder Committee did include professionals and experts including architects, contractors, builders, and developers and their consultants, as well as lay people, any of whom could have recorded dissent. Even some of the applicants for Entrada participated as Stakeholders. The "Vision" can therefore be considered to contain "expert" input.

1. General Plan, Land Use Element, p. 36: "The Plan proposes that **State Street be given particular and special treatment so that it, as the principal street in Santa Barbara, reflects the character of the town**. Rather than eliminating the center dividing strip which now exists between Mission and Constance streets, as has been proposed by some as a means to expedite traffic on that portion, **the center strip**

1

should be extended down to the proposed Paseo Estado and, below that, from the Paseo all the way to Cabrillo Boulevard. The basic circulation pattern, which we shall explore later, should provide the necessary vehicular capacity to alleviate problems which may arise by the changes in State Street as a carrier of through traffic.

The center strip is only one of the techniques available to make a feature of this important street. Renaming prosaic "State Street" to something more in keeping with the community would add something to it. A return to the original "Estado" would be a step in the right direction. Also, distinctive pavement and street furniture design, lighting, and directional signs **might be used to set the street apart as a place of special importance."**

2. Downtown/Waterfront Vision, Recommended Themes, Action Steps and Implementing Options, as numbered therein:

Theme I.A.: The beautiful vistas and sweeping views of the ocean and mountains are maintained.

Action Step 2: Follow existing guidelines or develop new guidelines and new zoning to ensure that views, view corridors and vistas are maintained.
Implementing Option b: Use **overlay zones for critical corridors where lower height limits and greater setback requirements are needed to ensure preservation of views**.
Implementing Option d: Continue to **require analyses and accurate elevation visuals for all projects in critical view corridors and for projects which will have an impact on views.**

Action Step 3: Maintain the General Plan policy that "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".

Action Step 4: Review setback and height rules in critical view corridors for consistency with the Vision.

Implementing Option b: Identify **view corridors on or near State Street where lower height limits and increased setbacks should be considered.**

Theme III.C: The Waterfront has plentiful active and passive open space.

Action Step 2: Provide an open and beautiful ambiance in the Waterfront area.

Implementing option b: Require that larger nonresidential developments include park-like open space and plazas when land area is available and especially in more visible locations along major streets.

The main purpose of this submission is to call for the inclusion in the EIR of several reasonable and logical alternative design scenarios as alternatives to the presently proposed project. Note that no change in the general intent or objectives of the proposed project would be required. Only a change in the number and/or size of the individual units would be required.

Although I have no specific credential as a "View" expert, I do have a PhD in physics. In obtaining that degree I had courses in engineering and mathematics which qualify me as expert at least for understanding and evaluating the merits of the alternatives, including the proposed project as submitted, as to the relative mitigation of the loss of views. The actual measurements and calculations should of course be done by a licensed and practicing engineer who deals professionally with survey and sighting, but I am capable of evaluating the methods and procedures to be used.

The purpose for examining the alternative scenarios is to compare the relative mitigation of view loss among the alternatives, including the proposed project. Such information is essential for the public and decision makers to be able to compare the amount of view and open space loss mitigation for each alternative.

Alternative A:

Alternative A would consist in maintaining the setbacks as required by the zoning ordinance, limiting the new buildings to two normal height stories (two-thirds of the height of the three story buildings), and leaving State Street at its present width but with a center strip as called for in the General Plan.

This scenario follows the General Plan desire expressed in the excerpt above to continue a center strip on State Street below the freeway to Cabrillo. It requires no modifications to the zoning ordinance setback requirements, as contrasted to the project as proposed. Finally it allows the determination of the effect on views and openness that the limitation to two stories would have, as implicitly considered in the "Vision" excerpt above. This seems an obvious alternative to examine in detail, but it has not been previously evaluated.

It is difficult to imagine why this scenario would not be included as an alternative in an EIR which would pass muster. There is nothing unreasonable about including this scenario as an alternative, and in fact it would be quite unreasonable not to include it.

Alternative B:

Alternative B would be the same as Alternative A, except that B would have no center strip, but would have the center strip space given instead to wider sidewalks. This

however would not follow the General Plan goal of extending the center strip to Cabrillo Boulevard. There would still be no need for modifications to the zoning ordinance for setbacks.

For both alternatives and the project as proposed, the attached Figure 1 shows schematically what measurements and calculations will be needed. It is granted that from a location close to any of the buildings on the east, the mountain views will be blocked. However it may be quite different as the mountains are viewed from eye level across State Street. These measurements and calculations must be made for several positions spread along State Street rather than what was done in the past, namely only at the California hotel. However that location is still a critical view location. Such measurements are not difficult or unreasonable. All that is needed are accurate dimensions of the proposed project and city streets with setbacks marked, proposed project heights, and a surveyor with transit and some trigonometry. Most of the dimensions and setback requirements can be provided by the applicants and city staff, except for the actual measurements. Although this is slightly simplified, any engineer will understand the intent, which is to find out how much of the mountains can be seen by an average person from across State Street, compared for each alternative and each view location.

Figure 1 also indicates (in hatched red) the increase in mountain views for a one-story limit. Although it would be unreasonable to require the entire project to be one story, there may be places in the project where a one-story height view corridor would provide considerable mitigation of loss of views. This is particularly true where the present views show much of the mountains, and where anything over one story would cover most of that view. Therefore, since adding one additional angle corresponding to a one-story height to the measurements alluded to in Figure 1 adds minimal additional effort, there is no reason not to include the effect of a one-story height limit to the view measurements from each view location. These measurements may then show particular locations where a view corridor over a one-story height would be useful, and view measurements would then be included at those locations.

The viewing directions must include angles up and down State Street from each location, as well as directly across State Street. Angles around 45 degrees from the normal to State Street, up and down State State Street should be adequate.

Also for each alternative and the project as proposed, it will be necessary to determine how the view up State Street and down toward the ocean is affected by each alternative. The perspective should be at eye level in the street and from close to each end of the project. The intent of this is to compare the feeling of openness and lack of canyon effect among the scenarios, which was expressed as a concern in the "Vision" excerpted above.

As to the reason for including scenarios with a two-story height limit, there was considerable discussion in prior Planning Commission hearings, including Commissioners themselves about considering a two story limit for this project. The "Vision" excerpts above also refer to consideration of lower height limits in critical areas.

This EIR is the obvious opportunity to find out in detail just how much difference in view loss mitigation a two-story limit would have.

It may be noted that the Vision excerpted above speaks of "lower height limits" and "greater setback requirements", never the opposite. Yet the proposed project would actually require zoning ordinance modifications which would allow for no setbacks at all in major areas. First and second and higher story setbacks are included here under the term "set back".

To have a useful and adequate EIR, it will be necessary that the EIR make it possible for the general public to compare apples with apples among all the scenarios. For example, all perspectives must be from the same eye level height at the same location in all viewing directions for all scenarios. Drawings such as schematically given in Figure 1 for each view location should have angles to scale and be large and legible enough that the accuracy and mountain view coverage can be checked for each alternative against the proposed project.

The EIR should contain in addition paper graphic presentations expressed as overlays of views of the mountains and up and down State Street for each alternative, overlaying the views to be seen in the case of the project as proposed. The graphic presentations should be scale drawings on paper and/or scale photos, clearly legible on 11" x 17" paper. It is understood that not every copy of the EIR for distribution can have such high quality graphics, but it is not adequate if the only copies available to the public must be used only in the offices of the Planning Department. Some sets of the high quality graphics must be available for the public to check out for reasonable periods for detailed perusal.

Since "Views" are the essence of this EIR, it is necessary that the public and decision makers be able to compare and view the views for each alternative with clarity and understanding.

Computer simulated movie views as shown previously at hearings are clearly not acceptable for making comparisons among the alternatives for purposes of this EIR. The public at least must have something to study carefully, rather than something seen poorly and fleetingly.

At a minimum, views from the following locations will be necessary: 1 point at the street corner at the California hotel (similar to views presented previously) looking to the proposed so-called "view corridor", 4 points from the westerly sidewalk of State Street (1 near each end of the project and 2 spaced about evenly between), 1 point looking from the street toward the ocean from the freeway end of the project, 1 point looking the other way up State Street from the ocean end of the project. This is not intended to preclude other additional view locations as well. For the Figure 1 type measurements, the sight lines should be from eye level on the west sidewalk of State Street to the peaks presently viewable across the proposed project area. All locations will have 3 directions with respect to State Street (+45 degrees, 0 degrees, -45 degrees). Depending on the results at

these locations, a need for measurements at other locations to show clearly where more view loss mitigation would be possible, may arise.

One obviously cannot say how much view loss mitigation each scenario will yield until the EIR is completed, but one can say with certainty that we will never know unless each scenario is seriously examined in the EIR in a way that all can easily compare the alternatives, and that as many avenues for view loss mitigation as possible can be included.

(SCHEMATIC)

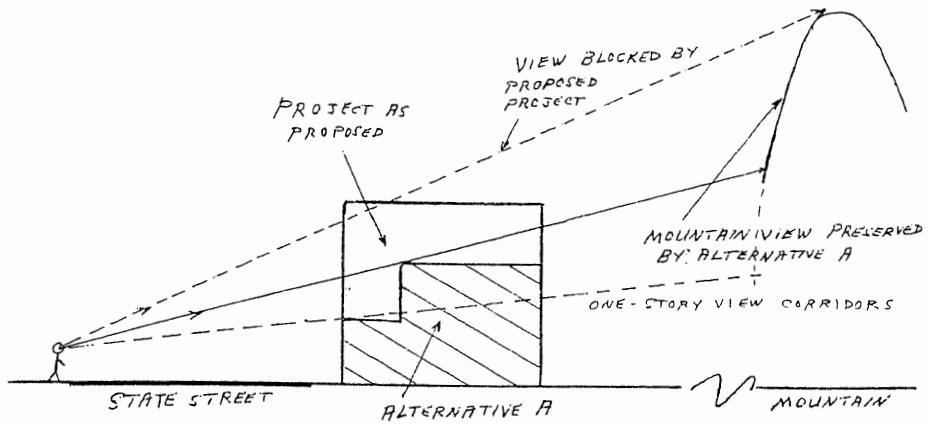


FIGURE 1

Nyle G. Utterback, March 2, 2001

Q-1. The basis for EIR conclusions of impact significance is clearly identified in the EIR analysis. Concerns and opinions regarding the environmental review process do not raise specific points about the EIR analysis, and will be forwarded to decisionmakers.

Q-2. Your comments are acknowledged.

Q-3. The EIR impact analysis describes the basis for impact level conclusions for each of the 19 viewpoint analyses and the project as a whole.

Q-4. The EIR analysis is qualitative and does not represent a weighting or "averaging" of impacts from individual viewpoint analyses. Section 4.5.1 states that the conclusion of adverse, but less than significant impacts on important public scenic views considered the totality of project impact analyses from 19 representative viewpoints. This emphasizes that the viewpoints were identified to provide a reasonable appraisal of a viewer's experience traveling on lower State Street in the project vicinity. The analysis concluded that no significant adverse impacts would result from any of the individual 19 viewpoints or from project as a whole.

Q-5. The comment summarizes the Viewpoint 6 analysis.

Q-6. The use of panoramic views that are experienced from viewpoints selected in the EIR are used to illustrate the ability to experience the larger visual context of the Waterfront area from this location, as defined in the last significance criteria, footnote 3., in section 4.3.2.1, rather than just the limited snapshot view. The EIR explains that Views 5 and 6 are taken from a "transition area" between the shoreline and more commercially developed land uses along lower State Street. The use of panorama views is necessary because the impact assessment on important public scenic views required a broader perspective beyond the "snapshot views." The panoramic view presented in View 6A is experienced before and after the View 6 as a continuum, and an individual's experience on lower State Street would not be focused exclusively on View 6 from this location.

Q-7. The commentor's opinion is noted.

Q-8. Please see response to comment Q-6. The "snapshot" concept and its limitations are explained in section 4.4.1 of the EIR. The visual context of the Waterfront area is defined in the last significance criteria, footnote 3. in section 4.3.2.1. In this case, the visual context of View 6 includes the ability to experience the Waterfront by looking from this viewpoint to the south. The visual expectations as identified in existing plans and policies refer to Local Coastal Plan policies that define existing visual

characteristics of the Waterfront (please see section 3.3, Local Coastal Plan). For example the Waterfront Area Aesthetic Criteria for New Development Assessment states, "Views to the foothills and mountains are still largely unimpeded by structures; in particular, the views from Stearns Wharf, Chase Palm Park, and East Beach offer unparalleled beauty." "Views are the most important dimension of naturalness. These views are to the ocean, other points along the Waterfront, and to the foothills and mountains. The contrast between the sweep of the coastline and the sweep of the mountains is especially dramatic and heightened by the linear elements of Chase Palm Park and Cabrillo Boulevard." The extent to which the views analyzed in the EIR are consistent with these characteristics is used to determine their relative importance of their public scenic view quality. View 6 has less of this quality than other views readily experienced from this same location by looking south (please see View 6A). Also, please see response to comment Q-6.

Q-9. No potentially significantly adverse impacts on public views were identified in this EIR. Therefore, no analysis of project alternatives is required as part of the EIR to reduce significant on public scenic views. City decisionmakers may consider additional project modifications in considering the land use and design merits of the project and their findings of the proposal consistency with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and the City's Local Coastal Program policies. Please see the Executive Summary, Areas of Known Controversy and Issues to be Resolved.

Q-10. The relationship and contrast of the Santa Ynez Mountains to the Waterfront is much more pronounced in View 6A, and the linear elements of Chase Palm Park and Cabrillo Boulevard are highlighted in View 6A, while they are not present in View 6. It is not necessary to "turn around" (from Viewpoint 6) in order to see View 6A; View 6A is part of a continuous field of view available at this particular location.

Q-11. Please see section 4.3.1.3 regarding the definition or criteria for a heavily visited public viewpoint. View 6 is generally experienced by the public for only a relatively short period of time as described in 4.4.7.

Q-12. The EIR emphasizes that it is reasonable to assume that a viewer would experience Views 6 and 6a in a continuum, with 6a being the more important and scenic view. View 6 is not experienced irrespective of its context along lower State Street. The "snapshot" concept, consistent with the analogy of looking through a long, narrow tube, and its limitations are explained in section 4.4 of the EIR.

Q-13. The EIR emphasizes that it is reasonable to assume that a viewer would experience Views 6 and 6a in a continuum, with 6a being the more important and scenic view. View 6 is not experienced irrespective of its context along lower State Street. The "snapshot" concept, consistent with the analogy of looking through a long, narrow tube, and its limitations are explained in section 4.4 of the EIR.

Q-14. Please see section 4.1.1 for a discussion of lower State Street visual resources relative to the commercial center north of Ortega Street. The document correctly characterizes lower State Street as a transition from the Waterfront to the commercial center. Findings of height, mass, bulk and scale are outside the EIR analysis and will be determined by the City decisionmakers.

Q-15. The EIR states that View 10, 10a, and 10b are not important public scenic views. Therefore, view blockage from these viewpoints does not constitute significant impacts. Section 4.5.2 explains that the panoramic contextual view was provided merely to present a broader field of view analysis that replicates the totality of the visual experience as one travels up and down lower State Street past this particular viewpoint. Openness, along with the size, bulk, and scale, and neighborhood compatibility, while related to public views, are not the subject of this EIR focused exclusively on public views. The Entrada project's openness will be considered by decisionmakers and City staff during future public hearings. The EIR provides facts to support decisionmaker findings, but does not preclude the Planning Commission or the City Council from additional project considerations.

Q-16. The view angle analysis prepared by Penfield & Smith was focused on the potential effects a one-story structure would have on mountain views as experienced from views on the sidewalk along lower State Street across from the Entrada project site (please see section 4.4.1., View Angle Analysis). The photographic support for this analysis is provided in Figure 4-14, View 7. The text of the EIR has been clarified to state that one-story structures, when viewed directly across the street (in other words, when standing perpendicular to the street sidewalk) would be capable of blocking the view of the Santa Ynez Mountains. This is not the case for oblique views, such as View 6. The Figure 1 provided in the commentor's scoping comments of July 11, 2000 is consistent with this perspective.

Q-17. This comment addresses the project's consistency with City plans and policies. The analysis of project consistency with City plans and policies contained in the Second Revised Mitigated Negative Declaration adopted by the City Planning Commission and on appeal by the City Council was found to be legally adequate by the Santa Barbara Superior Court judgment. This EIR provides a summary of preliminary conclusions regarding plans and policies related to public scenic views for consideration by City decisionmakers in connection with the review of the land use and design merits of the Entrada project. The EIR analysis provides more detailed analysis of public view impacts, but conclusions about view impacts and project consistency with City plans and policies are the same. Decisionmakers will have the opportunity to reconsider their policy consistency determinations as part of their re-review of the project.

Q-18. The EIR analysis focuses on the change in the environmental setting (baseline) resulting from the proposed project. The matrix referred to in this comment is for determining openness, lack of congestion, naturalness, and rhythm. Openness, along with the size, bulk, and scale, and neighborhood compatibility, while related to public views, are not the subject of this EIR focused exclusively on public views. The Entrada project's openness will be considered by decisionmakers and City staff

during future public hearings. The EIR provides facts to support decisionmaker findings, but does not preclude the Planning Commission or the City Council from additional project considerations.

This page intentionally left blank.

Andaloro, Debra
From: SANTACAM@aol.com
Sent: Tuesday, March 06, 2001 8:16 PM
To: dandaloro@ci.santa-barbara.ca.us
Subject: Entrada de Santa Barbara Project

Debra Andaloro, Project Planner
City of Santa Barbara
Planning Division
P.O. Box 1990
Santa Barbara, CA 93102-1990
E-Mail: dandaloro@ci.santa-barbara.ca.us

Re: Entrada de Santa Barbara

Planning Commission Meeting

Thursday, March 15, 2001

Dear Ms. Andaloro

I support the Entrada de Santa Barbara Project. The results of the "Draft EIR focused on public view impacts" again confirms the compatibility of this project.

R-1 This project is consistent with the Local Coastal Plan, upgrades an eyesore, (the vacant California Hotel) to the historic beauty it deserves, and encourages both tourists and locals alike to enjoy are beach front on foot.

Please listen to the majority who are in support of this project and approve the project as currently proposed.

Sincerely,
Jim Kodak
971 Cheltenham Rd.
Santa Barbara, Calif. 93105
(805) 682-7883
E-Mail: santacam @aol.com

Jim Kodak, March 6, 2001

R-1. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

RECEIVED
MAR 06 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Subj: **Entrada de Santa Barbara**
Date: 3/4/01 3:31:26 PM Pacific Standard Time
From: JALLEN9999 @ AOL . C OM
To: dandaioro@ci.santa-barabara.ca.us

S-1 The focused EIR is now completed and found " adverse but not significant impacts to public views". The obstrucionists have had their day in court. Now it is time to get on with the build out of The La Entrada Project and rid the city of a disgraceful ugly front door to our city. Let the project begin! John and Sandra Allen 1 El Vedado ln. #43 S.B.

John and Sandra Allen, March 4, 2001

S-1. This comment does not address the adequacy of the EIR analysis, but it will be forwarded to the decisionmakers for their consideration during project review.

Andaloro, Debra

From: Elisabeth Donati [elisd@silcom.com]
Sent: Wednesday, March 07, 2001 11:03 AM
To: dandaloro@ci.santa-barbara.ca.us
Subject: Comments/La Entrada

Hi Debra,

Attached is a PDF file (need Acrobat Reader to read) that is a letter Streets R Us is submitting concerning the VIEW EIR on La Entrada and also some additional comments concerning the petition drive we are working on. If you have any trouble reading the file, please email me immediately and I will fax it in or enclose as a word document. Thanks.

From a personal standpoint I would also like the Planning Commission to address the following concern:

T-1 I live on the corner of Chapala and Yanonoli and can see the mountains out of my 2nd story window in the direction of the proposed La Entrada project. I would like addressed, in addition to the views from close proximity to the project, whether or not the 3 story project will obstruct my view of the mountains from where I live. I think there are others who feel as I do and I for one thoroughly enjoy my sunrises over the existing homes across the street toward the direction of East Beach and would be disappointed if one of the main reasons I get up early would be taken away by this development.

I understand that the Planning Commission must address all issues brought before it by the public. Please advise as to the process by which they do this and how this issue will be addressed.

Regards,

Elisabeth Donati

Elisabeth Donati, March 7, 2001

T-1. The EIR is limited to evaluation of the proposed Entrada project's impact on public views and view corridors. Case law has limited consideration of visual impacts under CEQA to public views. Additionally, City plans and policies do not address private views. The comment will be forwarded to the decisionmakers during their review of the project on its land use and design merits.

Andaloro, Debra

From: [redacted].com
Sent: Thursday, March 08, 2001 2:12 PM
To: dandaloro@ci.santa-barbara.ca.us
Subject: Santa Barbara Planning Commission

I was unable to email this earlier because I was given the wrong address
by someone (not in your office). Thank You Martha Santizos
Santa Barbara Planning Commission

Subject: March 15, 2001 Planning Meeting

Dear Commissioners:

I understand that this is the group to write about plans under consideration now and in the future for Santa Barbara. There seems to be several projects that the city's elected appear to be continually fighting its own citizenry. This is particularly apparent of the La Entrada Project.

U-1 Repeatedly, the citizens of Santa Barbara have been told that the three story La Entrada Project will not have a significant impact on our mountain and ocean views. The pictures presented in a recent presentation are nice, but they don't show what it's like being on the first floor a block away in direct line of a three story building. We all know computers can make a picture show what someone wants. The majority of pictures in the EIR show the buildings blocking the views of the mountains. If this project is allowed to go forward as planned, it will take something away from several hundred thousand people who live in and around this community. What cost is being put on these units? Truly, whose interests are our government officials seemingly protecting? Why take away that view from the vast majority for a wealthy few?

I thought Santa Barbara did not want to be a Redondo or Manhattan Beach community. I hope the commissioners still listen to the locals.

Martha Santrizos
3108 Foothill Rd.
Santa Barbara, CA
phone 682-3966

Martha Santrizos, March 8, 2001

U-1. Of the 19 viewpoints for analysis in the EIR, several represent views of the proposed Entrada project on the first floor, a block away (e.g., Views 3, 5, 6, 10b, 11, 13, 15 and 16). The analysis shows that while the project would have an adverse effect on visual resources, impacts on important public scenic views would be less than significant. Private views from residential locations are not subject to City visual policies or CEQA review. Openness, along with the size, bulk, and scale, and neighborhood compatibility, while related to public views, are not the subject of this EIR focused exclusively on public views. The Entrada project's openness will be considered by decisionmakers and City staff during future public hearings. The EIR provides facts to support decisionmaker findings, but does not preclude the Planning Commission or the City Council from additional project considerations. The comment regarding the land use and design merits of the project does not address the adequacy of the EIR analysis. Your comment will be forwarded to the decisionmakers for consideration as part of their review of the proposed project.

MAR 01 2001

February 28, 2001

Mr. Grant House, Chair
Santa Barbara Planning Commissioners
City of Santa Barbara
Post Office Box 1990
Santa Barbara, Ca 93102-1990

Dear Planning Commissioners:

V-1 On July 1, 1999, the Entrada project came before you for a final vote on the mitigated negative declaration and approval of the project. This was done after over 17 public hearings in which there were design reviews, revisions, and efforts not only by the your Commission, Historic Landmarks Committee and Planning Staff, but also in responding to the public's concerns. This project passed the bar. Now with the court ordered EIR on views and aesthetics complete, your previous approval with conditions is confirmed. This project has not changed. It's still the same project you approved 19 months ago. As this beautiful city of ours continues to grow and change, you as our guardians of civic planning and the environment need to re-approve the Entrada project to send a message to others, that this is how our planning process works. Even those who had opposed this project at the beginning describe this process as one that worked and made it a better project. Now's the time, once again, for all of the Commissioners to certify the EIR and re-approve the project. To not do so, or change it in any way sends the wrong message not only to others who want to develop in our community but to the general public who have followed this project through the process.

Thank you,

Reggie Drew, Owner
Wheel Fun Beach Rentals
Santa Barbara Trolley Company
22 State Street
Santa Barbara, Ca. 93101
(805) 966-6733

Reggie Drew, February 28, 2001

V-1. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

W-1

Engines of growth abet crisis

comment

Harry S. Rouse

After reading the editorial, "Studying the housing crisis" (Feb. 16), I feel compelled to respond.

The guest speaker at the community housing meeting on Feb. 13, Manuel Pastor, made a persuasive argument for creating more affordable public housing, of even higher density than we already have. He, and other public housing advocates who attended that meeting at the Schott Center, were most eloquent in presenting various ways to resolve the so-called crisis.

But, I heard no one say anything about why we have a housing shortage. If we don't identify, and attack the root cause of an ongoing social

See **GROWTH** on G3

'All of these ills, which we now endure — and subsidize — are the obvious consequences of our community's runaway population growth. And, that growth didn't just happen; it was caused, by those who were elected to serve us and protect our best interests.'

Let's enact moratorium on growth

■ **GROWTH**
Continued from Page G1

problem, how can we possibly arrive at a lasting solution?

The fact is that our city and county governments and, I suspect, various local chambers of commerce, have all been busy promoting their grand objective of economic development for many years. Their efforts to attract and develop more and more industrial parks, chain stores, restaurants, large malls, shopping centers and resort hotels in our area have produced substantial and steady increases in the size of the local workforce.

Not to be overlooked, of course, are the additional sales tax and property tax revenues to be generated by more and more new commercial, industrial and residential developments — except for low-income rental housing projects, whose owners pay no property taxes.

Then there are the tens of thousands of untrained, uneducated visitors who have come here to stay, whether there are jobs for them or not. They are aided and abetted by our local governments and by such well-meaning organizations as the Community Housing Corp., all of whom do everything in their power to provide these visitors with low-cost housing, rent subsidies, health care, food stamps and other forms of economic assistance.

These are some of the factors that have helped create our overpopulation problem. It didn't just happen; it was caused. And now our local governments, and others, are trying desperately to build themselves out of the hole they have dug us into.

I call this the Magic Band-Aid School of City Planning: Make a grand mess of things, and then create new social welfare programs to fix the mess, while increasing tax revenues, expanding the local bureaucracies, and assuring a steady supply of minimum wage workers for local employers.

If I had a magic wand and could create 10,000 new housing units today, they would be filled up by tomorrow, and by the next day there would still be a crying need for another 10,000 units. Remember the adage: Build It and They Will Come!

So, when my Goleta neighbors and I attend the county's public hearings to argue against yet another low-income, high-density, subsidized rental housing project in our community, and we are met with open hostility by county supervisors and their employees. We know the South Coast is well on its way to becoming another San Fernando Valley, or worse. It is just a matter of time.

Are we given any respect because we express our concern for the well-being of our community?

No. We are falsely accused of being NIMBYs, racists and bigots. We are standing in the way of civic progress. We are selfish. We don't understand the problem. We lack compassion. The fact is, by questioning their grandiose plans, we have displeased our imperial county supervisors, not one of whom lives in the Goleta Valley.

The truth about us is: We oppose the planned creation of even more traffic congestion, air pollution, deliberate overcrowding of houses and apartments, vehicles parked bumper-to-bumper on residential streets, schools carrying heavier student loads than they can handle, loss of open space, shortages of electricity, fuel and water, and non-paying patients at our local clinics and hospitals.

All of these ills, which we now endure — and subsidize — are the obvious consequences of our community's runaway population growth. And, that growth didn't just happen; it was caused, by those who were elected to serve us and protect our best interests.

Now it is time to put a moratorium on all new construction projects for at least the next five years; time to start enforcing zoning ordinances and health codes; time to recognize that not everyone who wants to live here can afford to live here; time to restore the balance between jobs and housing by letting employers know that they can not keep bringing in more workers from out of town; time to stop promoting this community as an excellent place to live and open a business; time to stop building new resort hotels and time-share condominiums.

And finally, it is time to educate our local politicians and their developer friends to the fact that more growth is not a solution. More growth ... and they ... are the problem.

Harry S. Rouse is a resident of Goleta.

Eleanor Sorinson (?), No Date

W-1. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

CHARLES L. HANSON
P.O. Box 21545
Santa Barbara, California 93121

March 7, 2001

RECEIVED
MAR 08 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Hand Delivered
City of Santa Barbara, Planning Commission
630 Garden Street
Santa Barbara, California 93101
Attention: Debra Andaloro, Project Planner

Re: EIR Review - La Entrada Project - Planning Commission Hearing 3/15/01

Dear Ms. Andaloro:

X-1 The EIR prepared by S.A.I.C. on the Levy project for eighty-one time shares, commercial property, and 210 parking spaces on lower State Street indicates there are several areas where the view of the ridge line of the Santa Ynez mountains from State Street is blocked. Having reviewed the computer simulated view corridor, it is clear the project does not mitigate the view issue. This project of 96,500 square feet is just too massive for the proposed site!!

X-2 A similar project within the coastal zone several years ago was scaled back by the Coastal Commission from three stories to two stories due to the significant reduction of the mountain view. The Red Lion Inn was originally a three story structure, but the Coastal Commission not only reduced the project to two stories but set it back some sixty to seventy feet from the walkway so that the Santa Ynez mountain ridge line could be viewed. In spite of the massive breadth of that project, the height limitations and the setback put the project in proper scale and the result was a remarkable balance between ascetics and commercial viability.

X-3 The La Entrada project indeed was reduced in scope however, the three block area between Cabrillo and the railroad tracks gives the project a crowded and imposing effect which allows few view corridors to effectively mitigate the loss of the dramatic background of the mountains. This $75 million project is still too large for the proposed location.

X-4 The narrowing of lower State Street from Haley to Cabrillo Blvd. Is actually a violation of the California Coastal Act since it restricts access to the coastal area rather than enhancing accessibility. The activities in the Harbor/Waterfront area require the streets leading to the waterfront be left open and not constricted by any single project or master planning efforts.

This reduction of vehicle traffic lanes is inconsistent with a stated city goal of reducing congestion at the waterfront. Reducing the carrying capacity of any major street into or out of the area will only exacerbate existing traffic congestion. Harbor/waterfront/city activities such as: Old Spanish Days, Fiesta, Semana Nautica, Easter Relays, Hispanic Music Festival, Fourth of

X-4 July Fireworks, Harbor Festival, and numerous fund raising walks, runs, events require accessibility to the area. Eventually, the city **must** deal with the economic viability of all businesses in the area, not just a new project.

The Planning Commission and the City Council **must** conclude that narrowing lower State Street is not consistent with the California Coastal Act, the City of Santa Barbara/Harbor area master plan, or good common sense.

Respectfully,

Charles L. Hanson

DR. CHARLES L. HANSON
(Retired Vice President - Santa Barbara City College)

CLH:a

Charles Hanson, March 7, 2001

X-1. The comment does not specifically address the adequacy of the EIR analysis. Your opinion will be forwarded to decisionmakers.

X-2. Your comment is acknowledged.

X-3. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

X-4. The Santa Barbara Superior Court has determined that the previously adopted Second Revised Mitigated Negative Declaration (MND) adequately addressed all environmental issues associated with the Entrada de Santa Barbara project, except for potential impacts on public scenic views. The prior second Revised MND addressed circulation access and safety issues. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

Although the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500 foot long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing does not reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free flow roadway capacity changes from approximately 2,800 to 1,400 vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when lots of pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at LOS B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

This page intentionally left blank.

CRANDELL REALTY

March 9, 2001

Members of the Planning Commission
City of Santa Barbara
Santa Barbara, CA

Dear Madams, Sirs,

This letter is in response to the Draft EIR for the Entrada de Santa Barbara Project, issued February 2001.

After over 100 meetings, countless hours of public comment and expert testimony, and both Planning Commission and City Council Project Approvals, it seems we are once again standing at the crossroads.... In this case, however, the decision is as much about the efficacy of our City's Planning Process as it is about Entrada de Santa Barbara.

This project has repeatedly undergone significant modification in response to requests from the Historic Landmarks Commission, the City Development Staff, the Planning Commission, and voluminous public comment. This is one of the most important features of our planning process-- the inclusion of many voices-- and it has produced an exceptionally attractive and well thought-out project.

And now it is time to finish the process.

The current Draft EIR was to focus "exclusively on project impacts to public views" (ES-1), per the Superior Court judgement of April 2000. (Because, of course, all other planning issues had been thoroughly addressed in City Council and Planning Commission Approvals.) The conclusions of the Report are incontrovertible:

Y-1

"The overall analysis of public view impacts contained within this focused EIR concludes that the Entrada project will result in an adverse, but less than significant impact on the environment (Class III). Consequently, no measures are necessary or required in order to mitigate the project's public view impacts to a less than significant environmental level." DEIR ES-10

No measures are necessary or required -- what more is there to say?

Over a year and a half ago "the Planning Commission made the findings required by CEQA, adopted the Mitigated Negative Declaration for the (Entrada de Santa Barbara) project, and approved the Entrada project on it merits on a 5-1 vote..." (DEIR 2-31)

This focused EIR confirms that approval and proves that our planning process is thorough and works! Let us now put this issue, and project, to rest-- secure in the knowledge that the best processes yield the best products (or in this case, projects!).

Thank you for your time and attention to this matter.

Sincerely, Marcy Crandell

Marcy Crandell

CC: Mayor of Santa Barbara; Members of the City Council of Santa Barbara

137 LA VEREDA ROAD • SANTA BARBARA, CA • 93108
PHONE 805 969 1144 • FAX 805 969 6987

Marcy Crandell, March 9, 2001

Y-1. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

JORDANO'S

Pride, Commitment, Community Since 1915

March 8, 2001

RECEIVED
MAR 09 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Mr. Harwood A. White, Jr., Chair
Santa Barbara Planning Commission
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102

Dear Chair White, and Planning Commissioners:

I would like to point out a couple of significant issues that jumped out at me while reviewing the draft Environmental Impact Report on the views potentially affected by the Entrada de Santa Barbara re-development project, once built.

First, it appears to me that in the pictures depicting the views as they are now and as they will be once the project is completed, the area will only be enhanced. Yes, certain key views to the mountains from particular areas (i.e. in Views 10 and 8) will be obscured, however, the immediate view of the area will be greatly improved. (Not to mention the fact that one can simply turn their head just a bit to the left and enjoy a lovely - and sweeping - view of the Santa Ynez Mountain Range.)

Z-1

Additionally, I found it interesting that when considering the issue of 3-story heights on some of the units, I realized that it really isn't an issue at all. When looking at View 10, for instance, it is very apparent that even with a 2-story element, the views will be blocked just the same. And, as concluded in the DEIR, the views that are impacted are not *significantly* impacted.

I ask that you take a real hard look at the DEIR and conclude, when the time comes, that this project *still* deserves the Mitigated Negative Declaration that it was given nearly two years ago, and that the issues with the views has been proven to be a non-issue through the findings of the DEIR.

Thank you,

Peter C. Jordano
President

PCJ:jmc
cc: Mayor Harriet Miller
City Council

JORDANO'S INCORPORATED
550 South Patterson Avenue, Santa Barbara, CA 93111 · P.O. Box 6803, Santa Barbara, CA 93160-6803
Phone 805.564.0611 · Fax 805.564.2021 · www.jordanos.com

Peter C. Jordano, March 8, 2001

Z-1. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Letter of response to the Draft Environmental Impact Report: Entrada de Santa Barbara, February 2001

Saturday, March 10, 2001

Members of the Planning Commission
P.O. Box 1990
Santa Barbara, CA
93115

To the Members of the Planning Commission:

Firstly, I want to say 'Thank You' for all of the work the Planning Commission has done to make Santa Barbara such a beautiful and friendly city to live in. I admire and appreciate the commitment you all show to our city, and the countless hours you put in every month. I too, want to protect and preserve our way of life here, and that is why I follow the planning process with great interest.

I am writing to you in response to the February 2001 Draft EIR for Entrada de Santa Barbara. As our wonderful planning process invites public input, I felt it my duty to read the Draft EIR and respond to some of the issues addressed therein.

1. Focus of the Draft EIR
As stated in the *Executive Summary* (Entrada de Santa Barbara DEIR ES-1):

"This document's analysis is focused exclusively on project impacts to public views. Other environmental issues... (long list edited)... have already been evaluated in a Mitigated Negative Declaration adopted by the Santa Barbara City Council in August, 1999."

Clearly, the question on the table is the view impacts.

Why then, are the issues of "size, bulk, and scale"; compatibility with the City's vision of the future; neighborhood compatibility, sidewalk widening, and hotel unit-loss mitigation addressed in the *Areas of Known Controversy and Issues to Be Resolved* section of the Report (DEIR ES-6-7) and again in the *Conclusion* (DEIR ES-10)???

AA-1

These are all Planning issues and should not be a part of a CEQA document.
Further, these issues were all DECIDED in July of 1999 when the Planning Commission made the findings required by CEQA, adopted the Mitigated Negative Declaration and approved the project. And reinforced yet again in April, 2000 by the Superior Court judgement:

"The Superior Court judgement was clear that the required EIR should focus exclusively on the potential for adverse "public scenic view" impacts only." (Entrada de Santa Barbara DEIR 2-32)

We are concerned with views. Why are these planning issues brought up at all?

2. Specific Project Impacts on Views

AA-2

"The overall analysis of public view impacts contained within this focused EIR concludes that the Entrada project will result in an adverse, but less than significant impact on the environment (Class III). Consequently, no measures are necessary or required in order to mitigate the project's public view impacts to a less than significant environmental level." (DEIR ES-10) (emphasis added)

AA-2

Please correct me if I am mistaken, but as I understand the above conclusion from the Draft EIR, "*no significant impacts*" means that no further mitigation is required, and no alternatives are necessary or required.
This Draft EIR confirms the decisions the Planning Commission and the City of Santa Barbara made in 1999 to adopt the Mitigated Negative Declaration and to grant the project approval.

AA-3

It is clear that the City has complied with the judgement of the Superior Court in preparing the Draft EIR, and that the conclusions of the Draft EIR find no significant impacts and no project alternatives.

It is time to approve this project and move on. Our planning process has been exhaustive and complete, and has produced a project that both meets the City's goals for development and will be a wonderful addition to our waterfront in so many ways.

I personally will be proud of it, and of the process that created it.

I thank you for your time and attention.

Most Sincerely,

Leslie Crandell
137 La Vereda Road
Santa Barbara, CA
93108

CC Harriet Miller, Mayor of Santa Barbara
Members of the City Council of Santa Barbara

Leslie Crandell, March 10, 2001

AA-1. The Areas of Known Controversy and Issues to be Resolved address planning considerations beyond the environmental impacts identified under CEQA, and is required under CEQA section 15123. The issues will be considered by decisionmakers and City staff during future public hearings. The EIR provides facts to support decisionmaker findings, but does not preclude the Planning Commission or the City Council from additional project considerations to address the land use and design merits of the Entrada project.

AA-2. The comment is correct in interpreting CEQA and the lack of a need for EIR analysis of additional mitigation or project alternatives to reduce project environmental impacts.

AA-3. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

A Letter of Response to the Planning Commission on the topic of the Draft Environmental Impact Report: Entrada de Santa Barbara, February 2001

11 March, 2001

Dear Members of the Planning Commission,

I am writing to you as a current staff member and former student at UCSB, a board member of the Ka Nai'a Outrigger Canoe Club, and a fifteen year resident of Santa Barbara.

BB-1 I am not normally pro-development. But I park & walk in the project area 4-5 days a week on my way to the beach and the Ka Nai'a Outrigger Canoe Club, and I know firsthand how badly the area needs to be repaired. I have followed the progress of the Entrada project with great interest because of this, and am proud that the community has been so well considered in the development plan for the area. I support it whole-heartedly. You all have done a heck of a job.

And now the last issue seems to be the views of the mountains/ ocean.

BB-2 We all want the same thing, I think. To be able to enjoy the natural beauty of Santa Barbara wherever we may be in the City. And I would be the first to condemn a project that prevented that– one that destroyed our precious ocean and mountain views. But having spent many hours on State Street looking at the specific view corridors in question, I have come to the personal conclusion that this project doesn't affect <u>any</u> of them significantly.

BB-3 There is no impact looking down State Street towards the ocean, and no real impact from Cabrillo Boulevard. As for the views on State Street looking towards the mountains, when you stand on the sidewalk, ONE story blocks the view completely. There are already existing large structures in the immediate area that we never think twice about (the California Hotel, the Bekins building, the newly expanded Romasanto hotel.) The view simulations show that project is well removed from Cabrillo Boulevard and set well back from State Street.

BB-4 If anything, the overall views would be greatly improved by the project. No more telephone poles, no overhead wires, no expanses of filthy and cracked concrete, no more trash. The addition of walking paseos, attractive landscaping and what I understand is a very large setback from the street will enhance our existing view corridors greatly! The photos and building simulations *clearly* show this.

BB-5 And for those who say that the view will be blocked looking from Mission Creek towards the mountains, I say this: for the last five years I have *spent ten- plus hours a week* down at the Wharf. *I walk along the affected blocks of State Street and <u>Cabrillo ten times a week</u>, and I have YET to see ANYBODY stand next to Mission Creek to take in views of ANYTHING.* They stand at the Dolphin Fountain, or out on the Wharf itself... the only thing they appear to be looking for while walking on State Street is the next store to shop in!

BB-6 But regardless of what I think, the professional consulting group hired to evaluate environmental impacts (SAIC) has determined that there are *no significant impacts on the views.* As I understand it, the finding of "No significant view impacts" means that the requirements of Judge Anderle's ruling has been met, that no alternatives are necessary or required, and that no further issues remain in the way of approval.

To this I say "Bravo!"

BB-7 We have so many challenges in Santa Barbara, let's move on to those with the hope that we can meet them as successfully as the planning process has shaped the Entrada project for our community.

Thank you for hearing me out, and thank you for a job well done!

Warmest Regards,

Nicole LeBlanc
534 Mills Way
Goleta, CA

Nicole LeBlanc, March 11, 2001

BB-1. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

BB-2. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

BB-3. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

BB-4. Removal of overhead utility lines throughout the project area has been identified as a beneficial project impact.

BB-5. The comment is consistent with the EIR analysis of viewing duration at View 6. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

BB-6. The comments regarding the conclusions of the EIR analysis and the lack of need for project alternatives, except for the No Project Alternative, are correct. The decisionmakers have the discretion to impose additional project revisions in ensure the project's consistency with City plans and policies.

BB-7. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

RECEIVED
MAR 1 2 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

The Santa Barbara City Planning Commission
Dear Chairman White and Planning Commissioners, 3.7.01

I have read the draft EIR prepared by SAIC for the Entrada de Santa Barbara project twice, since such a detailed document, with so many different photo simulations requires close consideration.

I believe the draft EIR is a good-faith effort to present a document which is both accurate and complete, *and* fully consistent with local guidelines for the California Environmental Quality Act. As such, the draft EIR on the Entrada project's "views" should be certified.

I also agree with the draft EIR's conclusion that there are no Class One or Class Two impacts associated with this project. No profound blockage of key city, mountain, or waterfront views should occur, either from the view of a pedestrian or someone in a moving vehicle, which are irremediable.

CC-1

Obviously, at some specific locations, some specific views will be altered. However, equivalent views should be available close to those locations for residents, for visitors, and for Entrada guests.

SAIC's official conclusion on Page ES-10 in the draft EIR that the project will result in an "adverse, but less than significant impact on the environment" is the right one. So is their assessment that "no measures are necessary or required in order to mitigate the project's public views impacts". The draft's evidence supports that conclusion.

Therefore, the last paragraph of the Executive Summary's *Conclusion Section* on Page ES-10 is superfluous to the draft document's legal need to comply with CEQA, and should be deleted.

Most of this last paragraph is hypothetical, speculative, unrelated to CEQA "view" issues. Including them would be "leading" decision-makers in areas that relate to Entrada planning and land-use issues, but ***not*** its CEQA impacts. Since all of those last-paragraph issues will be considered by the Planning Commission, staff, and the public, at normal Entrada project review hearings, but aren't germane to CEQA "views" review, they should be removed from the draft EIR's "Conclusion" section.

CC-2

The last paragraph in ES-10 doesn't flow from items or evidence within the draft EIR. The draft EIR appears to be accurate and complete without them. So, the last paragraph should be deleted from the Final EIR. If City staff feels points made in that paragraph are important to the Commission's planning & land-use review of Entrada, they should be distributed to the Commission under a separate cover as part of a staff report to the Commission, but *not* in the draft EIR. It's already hard enough for the Commission (and public) to separate its CEQA review from its project review function. Retaining draft EIR discussion extraneous to CEQA only furthers this confusion. The draft EIR is strong enough to stand on its own merit without it.

Lee Moldaver

Lee Moldaver, March 7, 2001

CC-1. These comments will be forwarded to the decisionmakers for consideration during their review of the project.

CC-2. The Areas of Known Controversy and Issues to be Resolved address planning considerations beyond the environmental impacts identified under CEQA, and is required under CEQA section 15123. The issues will be considered by decisionmakers and City staff during future public hearings. The EIR provides facts to support decisionmaker findings, but does not preclude the Planning Commission or the City Council from additional project considerations.

Miller, Harriet

From: Paul Norton [p.norton@verizon.net]
Sent: Sunday, March 11, 2001 10:21 PM
To: hmiller@ci.santa-barbara.ca.us; mblum@ci.santa-barbara.ca.us; ggarcia@ci.santa-barbara.ca.us; tomrinsb@home.com; drdan@rain.org; ghart@ci.santa-barbara.ca.us
Subject: Levy project

Council members,

DD-1 I oppose the Levy project. The pictures in the paper clearly show that it blocks views! State stree should not be narrowed for the profit of a developer either.

Paul Norton
2922 Paseo del Refugio
Santa Barbara, CA 93105

Paul Norton, March 11, 2001

DD-1. The Santa Barbara Superior Court has determined that the previously adopted Second Revised Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project, except for potential impacts on public scenic views. Analysis of project impacts pertaining to traffic, circulation and safety was provided in the prior Second Revised MND. This comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

Although the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500 foot long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing does not reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free flow roadway capacity changes from approximately 2,800 to 1,400 vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when lots of pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at LOS B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

This page intentionally left blank.

March 12, 2001

Santa Barbara Planning Commission
P.O. Box 1990
Santa Barbara, CA 93102

Chair & Planning Commissioners:

I'm Reggie Drew, owner of Wheel Fun Bike Rentals, S.B. Trolley Company & Wine Tours and Santa Barbara Resortwear. I'm here speaking on behalf of the many tenants within the project area. The Entrada project has been before you for almost three years now.

We've been waiting for close to 10 years for this development to improve our waterfront. As many of you are aware, most of our businesses are visitor serving. The majority of us will continue to be tenants in Entrada once it's completed. I'm sorry to hear that's not the case for the 11 or more tenants who've been displaced at the Yanonali project.

EE-1 We firmly believe in this project. For the past three years, the Levy Group has gone through countless hearings. The project has been refined over and over again in order to meet your high standards. This area is a dead zone right now. Most of our business is done on weekends or summer months.

The Draft EIR is completed. It re-affirms what we all knew 18 months ago. There are NO SIGNIFICANT IMPACTS TO VIEWS. It's time for those who oppose well-planned development to embrace our planning process. They may not like or get everything they want, but Entrada gives all of us so much more.

PLEASE ALLOW ENTRADA TO MOVE FORWARD.

Reggie Drew, Owner
Wheel Fun, S.B. Trolley & Wine Tours & S.B. Resortwear
22 State Street

Reggie Drew, March 12, 2001

EE-1. The comment does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

RECEIVED
MAR 14 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

March 12,2001

Debra Andaloro
Project Planner
City of Santa Barbara
Post Office Box 1990
Santa Barbara, Ca. 93102

Re: Draft EIR
Entrada de Santa Barbara

Dear Ms. Andaloro:

FF-1 Thank you for the opportunity to respond to the Draft EIR prepared by SAIC on behalf of the City regarding view impacts of the Entrada project. We have followed this project through the planning process for almost three years now. We know for a fact how hard the Levy Group has worked on responding to the public's concerns, Planning Staff, Planning Commissioners, and Landmarks Committee Members. It was no surprise that the City approved the Mitigated Negative Declaration and gave their approval of the project.

FF-2 In reviewing the DEIR, two areas stood out to me. View # 17 looking from Mason Street down Helena Street towards the waterfront, my recollection was that the new building on the corner was a two story, then to three stories and back down to two stories. If this is correct, this photo simulation appears to be incorrect. Even so, this view corridor is not impacted and the new buildings are not intrusive to the surrounding buildings. We feel it enhances the transition from State Street to the "funk zone." We also agree that view # 10 is a less than significant view. However, what really caught my eye was the fact that even any one-story building blocks the entire ridgeline of the mountains, and always has. This was something that had continuously been debated, but nobody seems to realize. This evidence certainly proves this important fact. While we acknowledge that we're not experienced in reading EIR's or what the California Environmental Quality Act is completely about, we do know that the Judge ordered the City to prepare a focused EIR that only relates to views. Our question to you is, why does this report contain other elements of discussion that are unrelated to views? The consultant's conclusions state that because there are no significant impacts to scenic public views or vistas, there are no further requirements for other mitigations or alternatives. Yet, he states that the City may

FF-3 further refine this project to enhance or improve view corridors. This seems not only contradictory but is this legal?

FF-4 In closing, we believe that this focused Draft EIR concludes and confirms the original Mitigated Negative Declaration that was approved by the Planning Commission and City Council in 1999. We applaud the developer, Planning Staff, Planning Commissioners, Landmarks Committee Members and City Council for their hard work, and making Entrada such a beautiful addition to our City. You all should be proud of the original approval. This EIR gives you overwhelming support to re-approve this beautiful addition to the present rundown entrance of our city

Thank you for taking the time to read this letter.

Yours truly,

Mr & Mrs. Stephen Petersen

cc: Mayor & City Council Members

Mr. & Mrs. Stephen Petersen, March 12, 2001

FF-1. The comment does not specifically address the adequacy of the EIR analysis.

FF-2. Please see Appendix D of the EIR that explains in detail the photosimulation methodology. The simulations are based on photographs of the existing setting at the time of DEIR public circulation. The View 17 photosimulation correctly depicts the Area B buildings adjacent to Helena Avenue. The comment does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

FF-3. No significantly adverse impacts on public views were identified in this EIR. Therefore, no analysis of project alternatives is required to minimize impacts on public scenic views regardless of the EIR impact conclusions, City decisionmakers may determine that additional project modifications are needed to find the proposal consistent with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and the City's Local Coastal Program policies. Relative to the comment on inclusion of the section of the EIR entitled "Areas of Known Controversy and Issues to be Resolved," this section addresses planning considerations beyond the environmental impacts identified under CEQA, and is required under CEQA section 15123. The issues will be considered by decisionmakers and City staff during future public hearings. The EIR provides facts to support decisionmaker findings, but does not preclude the Planning Commission or the City Council from additional project considerations.

FF-4. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Mr. Harwood A. White, Jr., Chair
Santa Barbara Planning Commission
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102

13 March 2001

ATTN: Ms. Debra Andaloro
Fax 897-1904

Dear Chair White, and Commissioners:

I am writing to express to you my support for Entrada de Santa Barbara and the findings of the DEIR confirming that there are no significant environmental impacts to views.

After years of hearings, meetings with both the public and government officials, changes to the project design, and lots of patience, Bill Levy and his team are coming before you, yet again, to obtain the much deserved approval for the Entrada de Santa Barbara re-development project.

GG-1

Now that the view DEIR has finally been done, acknowledging the lack of significant impacts and supporting the original Mitigated Negative Declaration, I simply ask that you remain firm in your original approval of this project back in 1999.

Thank you,

Please help us to improve this entrance to S.B.
Many thanks

Name

K. Kassity

(687-1159)
990 Debra Dr. S.B. 93110

cc: Mayor Harriet Miller
City Council Members

RECEIVED
MAR 14 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

K. Kassity, March 7, 2001

GG-1. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Bonnie Alexander
221-C West Quinto Street
Santa Barbara, CA 93105

March 13, 2001

Ms. Debra Andaloro, Project Planner
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102

RECEIVED
MAR 14 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Re: Entrada de Santa Barbara/Draft EIR

Dear Ms. Andaloro:

I am a long time resident of Santa Barbara, and though I will not be able to attend the meeting on Thursday, I hope that you will take what I have to say into consideration when you meet with the Planning Commission.

HH-1 I must admit that I agree with the two groups who are opposing the project that an EIR should have been done at the very beginning of the approval process for this project. I'm sure that this thought has even crossed Bill Levy's mind a couple of times as well. Now that the EIR *has* been done, though, isn't it time to move forward? The findings stated that there aren't significant impacts to the views, and therefore, no additional mitigation is necessary. This project got a Mitigated Negative Declaration back in August of 1999, and it should be remembered that in order to earn such a declaration, significant impacts had to have been mitigated.

HH-2 I read a recent quote in the News-Press in relation to the proposed condominiums at Yanonali and Garden Streets that said "The property owner has a right to develop his property. It's not our choice." Shouldn't this apply to Entrada, as well?

Thank you for your time,

Bonnie Alexander

Bonnie Alexander

cc: Planning Commissioners

Bonnie Alexander, March 13, 2001

HH-1. The comment does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

HH-2. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

RECEIVED
MAR 12 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

EICHSTAEDT

3/10/01

TO THE PLANNING COMMISSION
CITY OF SANTA BARBARA

RE **LA ENTRADA**

I AM AN ARCHITECT AND LAND PLANNER WITH 36 YEARS OF PRIVATE PRACTICE, SPECIALIZING IN OFFICE PARK PLANNING AND DESIGN. MY FIRMS WORK HAS WON NUMEROUS AWARDS AND HAS BEEN PUBLISHED BY THE URBAN LAND INSTITUTE. I MOVED MY FIRM TO SANTA BARBARA FROM CHICAGO IN 1992.

I AM VERY CONCERNED THAT THE LIVELY WATERFRONT ENVIRONMENT CREATED BY LA STRADA IS DEDICATED TO TOURISTS, NOT THE RESIDENTS OF SANTA BARBARA. FOR MANY OF US THAT HOUSING WOULD PROVIDE AN ALTERNATIVE LIFESTYLE CLOSE TO THE BEACH, WHERE THERE IS PRECIOUS LITTLE HOUSING AVAILABLE.

I KNOW FROM MY EXPERIENCE IN FLORIDA THAT TIME-SHARE HOUSING IS LUCRATIVE FOR THE DEVELOPER, BUT HAS NO *USABLE* BENEFIT TO THE PEOPLE OF THE COMMUNITY.

II-1

I WOULD SUGGEST THAT IF THE APARTMENTS ABOVE THE SHOPS BECAME CONDOMINIUM HOUSING FOR THE COMMUNITY, MANY OF THE OTHER OBJECTIONS OF TRAFFIC, VIEWS, AND DISPLACEMENT OF RESIDENTS WOULD BE MITIGATED. EVERYONE I KNOW IS CONCERNED ABOUT THE LACK OF HOUSING IN SANTA BARBARA, AND NOONE WANTS MORE TOURISM WITH ITS RELATED CONGESTION.

THIS MIGHT NOT BE QUITE AS PROFITABLE FOR THE DEVELOPER, BUT COULD STILL BE FEASIBLE WHILE PROVIDING BALANCED BENEFITS TO THE COMMUNITY AND THE DEVELOPER.

THANKS FOR YOUR ATTENTION TO THIS IMPORTANT ISSUE.

ALBERT EICHSTAEDT AIA

MY HOME:
2432 DELAVINA B
SANTA BARBARA 93105
MAIL: P O BOX 21525 SB 93121

Architects/Planners
903 State Street 201
Santa Barbara California 93101
Telephone 805-965-6090
Fax 805-965-4947
Email eicharch@silcom.com
Albert Eichstaedt AIA

Albert Eichstaedt, March 10, 2001

II-1. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

The following additional information is provided to explain why housing in lieu of vacation ownership units would not be a permitted use at the Entrada project site. In addition to the fiscal constraint to housing development due to high land values in the coastal zone, per direction of the Coastal Act and Coastal Commission, City zoning for the area has to designate the area for specified types of coastal uses, focused on visitor-serving and ocean-dependent commercial types of uses. The City has a long history over past decades of trying to include housing in the mix, and in fact housing was previously proposed on the parcel, but the Coastal Act and Commission have not considered housing to be a high priority for use of limited coastal resources.

2610 Mesa School Lane
Santa Barbara, CA 93109-1853

RECEIVED
MAR 13 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

March 12, 2001

City of Santa Barbara
Planning Division
P.O. Box 1990
Santa Barbara, CA 93102-1990

Attention: Debra Andaloro, Project Planner

Gentlemen:

RE: LEVYTOWN- ENCINA PROJECT

JJ-1

We know three-story high buildings will block scenic views. Just common sense shows this if you stand at the Dolphin Fountain and State Street at Cabrillo Blvd.

Please abide by the city's General Plan which states: "New development shall not obstruct scenic view corridors including those of the outer foothills and mountains viewed respectively from the beach and lower elevations of the City" (Conservation Element Policy 3.0)

This area's greatest assets are its natural beauty of the mountain and ocean views. Please don't let this project pass as it is completely against our community's desire to protect Santa Barbara's natural heritage.

It is bad enough the motel and restaurant on the corner of Cabrillo and State went 3-stories high this last fall blocking the mountain views coming from the west on Cabrillo going to Stearns Wharf. (And the ugly cement skate board park)

As Claudia Madsen said in her comment in Sunday's paper, "Don't let the developers steal our views!

If you do pass it, this Mayor, City Council, and Planning Commission will be remembered forever as the people who ruined our waterfront area.

Respectfully,

Mr. & Mrs. A. Toye

Mr. & Mrs. A. Toye, March 12, 2001

JJ-1. The EIR analyses concludes that the project's impact from blocking portions of the Santa Ynez Mountains would be adverse, but not significant. The EIR in Chapter 3.0 addresses the Entrada project's consistency with the Conservation Element policy referenced. The impact assessment criteria utilized in the EIR (section 4.3) incorporate state and City visual plans and policies, including the Conservation Element policy referenced. Your comment will be forwarded to the decisionmakers for consideration during their review of the land use and design merits of the project.

March 13, 2001

Ms. Debra Andaloro
Project Planner
City of Santa Barbara
Post Office Box 1990
Santa Barbara, Ca 92102

Via Facsimile (805) 564-5477

Dear Ms. Andaloro:

KK-1

I'm writing to you in response to the Draft Focused EIR on the Entrada project. In following the issues in the Media recently, it is apparent that the EIR was ordered by the Court and the City has complied with that order. While many of us are concerned about the rate of growth in our Community, we can't stop people from wanting to live here and make Santa Barbara their home. The protection of views is an important issue for me, but so is the economic vitality of our businesses. A year and a half ago, the City approved this project overwhelmingly. I've heard and read comments for those who oppose this project that the City just rubber-stamped the Entrada project. Why then would a Superior Court Judge commend the City for its due process in approving the Mitigated Negative Declaration (excluding the view issue). Now the opponents have their EIR on views, and yet they complain of its accuracy to anyone who will listen. I frequent the waterfront regularly. We can all exchange ideas on where's the best view or where is your favorite view, but in reality it's all subjective.

All I can say is that the views that are important to me are the same ones we probably all enjoy. Walking or driving along Cabrillo Blvd, Shoreline Park, A.P.S., the Courthouse, the Mission and Channel Drive just to name a few. Driving or walking along State Street presents other opportunities of views, beautiful architecture, landscape, pascos, outdoor cafés, and just the people in general.

The Draft EIR states that there will not be any significant impacts to views once Entrada is built. Please believe an expert's opinion instead of listening to those who will continue to oppose projects regardless of what the experts say.

Sincerely,

Maria Rabatin

Maria Rabatin
Tri-County Court Reporters
929 Santa Barbara Street
Santa Barbara, Ca 93101

Maria Rabatin, March 13, 2001

KK-1. The comment does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

RECEIVED
MAR 13 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

145 Vista de la Cumbre
Santa Babara, CA 93105
March 12, 2001

Dear Members of City Council and the Planning Commission:

I have spent a great deal of time this week reviewing the Entrada Environmental Impact Report. The report, I believe, can fairly be summarized in the following statements:

LL-1 -- if a view is of "limited scenic quality due to [existing] visual intrusions," further intrusions are OK:

-- if a view is experienced only in passing, or for a short duration, obscuring that view is OK;

LL-2 -- if a one-story building obscures a view from directly across the street, a multi-story building that obscures the view for long distances is OK, and;

LL-3 -- It is OK for planners and developers to disregard the protection of scenic views as required by the California Coastal Act, the City of Santa Barbara Coastal Plan, the City's General Plan, and the Visioning Report.

The report's overall finding of "no significant impact" is made possible only by the systematic trivializing of the manifest significance of existing scenic views.

One view is deemed unimportant because not enough people see it, another because people don't look at it long enough, another because the view is not "dominant." The report disingenuously claims Area C, "only has moderate visitation," and that "there are no public gathering spaces where people would linger in this locale." Writers of this report *know* that this project is designed specifically to attract visitors and, indeed, that the *City Redevelopment Agency itself is proposing a public visitor information/tourist center for this very area* (p.2.5). Further development of the lower State Street area will inevitably increase the use of State Street and of streets which may now see little use. The viewers to "justify" the views will come, but the views will have been rationalized away. Why does this report use only the conditions existing at this particular point in time to judge the importance of a view?

LL-4

Where existing intrusions such as trees, street lights, and utility poles could be removed or their effect minimized with relative ease, the recommendation of the report is never to remedy these defects and restore the view. Invariably, existing intrusions are used to justify further intrusion.

LL-5

In Views 9 and 10 , for example, burying utility cables and downsizing the Bekins building (an older structure which will doubtless be swept away by newer development) would greatly restore a view of the mountains which the report undiscerningly calls "neither abundant, intact, nor distinct." This view, with an eye to its preservation, must be judged to be potentially quite "abundant," easily made more "intact," and unquestionably "distinct."

LL-5

We're told more than once that the impact of Entrada's blocking a view is "negligible" because *we the viewers* (never the proposed project) can adjust. *We* can make "a slight change in orientation," or our eyes can "roam from one location or view to another."

LL-6

We're told that the loss of the potentially extensive view in View 7 is "not a significant effect" because a very narrow slice of the view will be saved. Incredibly, the report calls this tiny slice a "relatively intact" view! The report is careful to point out that (a scrap of) the mountain ridgeline remains visible in this slice, but neglects to mention that a view of the foothills, previously visible, has disappeared from this slice. Perhaps you remember that the report judged View 1 to have "no visual magnitude" because the foothills were not visible.

LL-7

I cannot go on: I will stop here. I have never read a more cynical document. This report cannot honestly claim as one of its objectives, to "maintain the expanse of views and feeling of openness" on lower State Street.

Ill-advised "development" has already obscured much of the public scenic views. Those which remain are either under seige or are rapidly disappearing as new projects go in and existing projects go "up." Approving this massive, view-blocking project would invite more of the same.

LL-8

If views of the Santa Ynez mountain range from lower State Street are an important City resource, where are the City plans to keep buildings low along the east side of the street? Where are the plans for broad, open spaces -- restaurants, perhaps, arranged around a large common court-yard opening onto State Street and furnished with tables and chairs for the open-air dining so popular in Santa Barbara or for casual outdoor entertainment, farmers' markets, and opportunities to buy from carts such as those at Paseo Nuevo? Place taller buildings on only one side of the street, the west side, avoid the "canyon effect" created by tall buildings located on both sides of the street, and, at the same time, maintain scenic views of the mountains. Projects on the west side of the street should have attractive setbacks and allow views of the Mesa, and, especially if they are to be residences, should be required to provide affordable housing on site for at

least a portion of the staff. If people in cars cannot appreciate scenic views at current driving speeds (as the report claims), it would be natural to extend the downtown street design into this area (an idea already under discussion), or employ traffic "calming" techniques to slow that traffic.

LL-8 This city has a long and successful tradition of interested and active citizens working with city planners toward the common goal of a city built in harmony with, and worthy of its natural surroundings. There will always be challenges to this vision. Let's not fail in the face of this challenge. This project is not designed for Santa Barbara.

Thank you.

Yours sincerely,

Kathiann Brown

Kathiann Brown

Kathiann Brown, March 12, 2001

LL-1. The comment addresses two of the three criteria used to determine if a view is an important public scenic view. The DEIR includes other impact criteria used to determine if existing views are important public scenic views and whether the proposed project's impacts on the existing scenic view quality would be *substantially* adverse. If an existing view is not an important public scenic view, the project's impact on that view is not substantial.

LL-2. The EIR does not result in this conclusion. The EIR in section 4.4 evaluates the proposed Entrada project's impact on important public scenic views. The height of the proposed project and the related impact is independent of the importance of the view affected. If a given view is not determined to be an important public scenic view relative to the criteria identified in the EIR, the proposed project would not result in a significant adverse impact on that view, irrespective of the proposed project's structural height.

LL-3. Please see response to comment F-4.

LL-4. CEQA Section 15125 requires that the environmental impacts in an EIR be compared against baseline physical conditions that existed at the time the EIR Notice of Preparation was published, not future conditions. The NOP for the Entrada project was issued on June, 27, 2000.

LL-5. The EIR impact analysis cannot require mitigation future measures that are not feasible. The activities identified in the comment are not reasonably feasible as mitigation measures and therefore are not identified pursuant to CEQA Section 15144.

LL-6. Section 4.5.2 explains that the panoramic contextual view was provided to present a broader field of view analysis that replicates the actual visual experience from this location. The use of panoramic views that are experienced from viewpoints selected in the EIR are used to illustrate the ability to experience the "visual context" of the Waterfront area as defined in the last significance criteria, footnote 3, in section 4.3.2.1. The use of panorama views is necessary because the impact assessment on important public scenic views required a broader perspective beyond the "snapshot views" of Views 7, 8, and 9. The concept of "turning one's head to allow for a more sweeping view of the Waterfront from the same viewpoint is used in Viewpoint 2, 3, and 4.

LL-7. The portion of foothills presently visible in View 7 is minimal and is degraded by existing utility lines. These intrusions would be removed with the project, allowing an unobstructed view corridor of the Santa Ynez Mountain ridgeline. The existing magnitude of the view corridor is not considered abundant. The project would further block the existing view. The impact would be adverse, but not significant.

LL-8. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

SOTHEBY'S
International Realty
Licensed Real Estate Broker

RECEIVED
MAR 15 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

March 14, 2001

Debra Andaloro
Project Planner
City of Santa Barbara
Post Office Box 1990
Santa Barbara, Ca 93102

Dear Ms. Andaloro,

I am writing this letter in support of the La Entrada project.

MM-1 After careful review, I feel the draft EIR upholds the Planning Commission's reviews from 1999 that there are no significant impacts to mountain views by the project.

Sincerely,

Gregory Tice
Vice President
Sotheby's International Realty

1106 Coast Village Road, Suite D, Santa Barbara, California 93108
Telephone 805 969 9993 *Facsimile* 805 969 9376

Gregory Tice, March 14, 2001

MM-1. The comment does not specifically address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

SOTHEBY'S
International Realty
Licensed Real Estate Broker

March 14, 2001

Debra Andaloro
Project Planner
City of Santa Barbara
Post Office Box 1990
Santa Barbara, Ca 93102

Dear Ms. Andaloro,

NN-1 As a seventh generation Santa Barbaran, I naturally possess a deep appreciation and sense of concern for our City. A project of this scope and size, in this "gateway" location, should be reviewed carefully and thoroughly. I've followed the progress of this project as it made its way through the permit process and feel the Planning Commission and City Council were correct in approving it. Furthermore, the Focused Draft EIR findings confirm the City's original decision. Nothing about the project or that approval has or should change. I feel that the Levy Project has worked hard to mitigate the project's impact on view corridors.

Once this project is completed it will meet the City's objectives in complementing the Railroad Depot renovation and Chase Palm Park expansion and be a focal point for our waterfront.

Sincerely,

James B. Rickard III
Sotheby's International Realty

1106 Coast Village Road, Suite D, Santa Barbara, California 93108
Telephone 805 969 9993 *Facsimile* 805 969 9376

James B. Rickard III, March 14, 2001

NN-1. The comment does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

2-15-01

RECEIVED
MAR 14 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

City of Santa Barbara
Planning Division
630 Garden St.
Santa Barbara, CA. 93101

Dear Planning Commissioners,

I fervently implore you to take the issue of views and the La Entrada project to heart and spirit, rather than just development desirability of that property. They should be given serious consideration as it will change an asset to all, and give it to only a few.

Having trusted in our commissioners and city counsel's to protect the essence of what is precious to our community, I have failed to voice my concerns before now. Having seen the most revealing pictures published in the News-Press of your study, and the comments by the Planning Commission on those "views" I was devastated. My immediate response was I wanted to tar and feather the scoundrels that would make comments like "would not substantially degrade the overall scenic experience", who would accept only "glimpses" of the mountains from any vista at the waterfront, and worst of all "no significant loss".

I felt wounded, I'd heard about the view issues, and mistakenly thought, "my God they'll never let someone ruin those views." I am so thankful that the News-Press published at least one of the pictures. After glimpse of it, my trust in you and city counsel was crushed. Had I not seen the photo, I would have trusted you to passionately protect one of the most striking and majestic elements our community possess', for ALL to behold

I feel that before a decision is made on the public comment phase, all the photos should be placed publicly. Not only in the News-Press and Independent, but on display at the main library, for a period of time, to give the public a clear realization of loss we may experience due to this project.

OO-1

To see from the ocean to the mountain's range (The FULL RANGE), with our lovely community laid at the mountains feet, is not only exceptionally unique in California, but unique worldwide. It is to be preciously preserved, this has been stated TIME AND TIME AGAIN, in various documents, that citizens have painstakingly spent their time helping to develop. The General Plan, Coastal Commission guidelines, and very recently and importantly The Vision Committee. It seems crystal clear to me in these documents that the citizens have spoken of maintaining open views to the mountains, and an uninterrupted ridgeline.

If the last 6 weeks haven't convinced you of the beauty and grandeur of our mountain VIEWS, of the essence of how they magnificently contribute to our overall scenic experience, in my opinion you're not truly a Santa Barbaran and you missed out on a remarkable show, a remarkable experience. Those mountains are every bit as dramatic and influential to the Santa Barbara experience as the ocean is and red tile roofs. To grant a group of only a few, compared to the masses over time, that could behold that continuous ridgeline, and all of its beauty, seems so unfair, unjust, since citizens have made it clear over and over again, they love it too. Weather you're homeless or driving a Rolls, as you travel along the Waterfront, you now and in perpetuity, should be able to see the grandeur that our mountains give to ALL of us, not a select few. Most of us, that live here, can't afford those sweeping views at our homes, but Cherish living here because in a few places (IE: THE WATERFRONT) we too, can revel in their beauty.

Clearly the Levy group have the right to develop commercial property there. However, this does not give them the right to steal away from the public, air space above the property, which would create a GREAT LOSS for our community. Along the way I heard "Bulk and Scale" talked about, how they have dutifully revised plans, 3-4 times, and the three story elements. Watching the Waterfront issues come up over the last 10 years, it is clear that the M.O. of developers is to come in huge originally. Because they know it will be scaled back. They make the request changes in small incrementally revisions and get to a point where they should have been originally, when they first walked through the door. Yet at that point they can say what a good developer they have been and made so many concessions from their original, and how trying and expensive it all is. I wish you folks would take a "Glimpse" at some of these projects and send them packing with a laugh, before you spend public time dealing with obviously grandiose plans from the outset. Just say "Whoa! Too grandiose, great reductions must be made, before we even look at this."

Seems ~~clear~~ time the City must make it clear what size development will be allowed at the Waterfront. In my opinion, 2 stories should be the max., but I'd actually prefer seeing only one story , but probably unrealistic. If 3 story elements are used they should be a small fraction of the overall building, such as turrets and towers and always have public access, in those areas. Even 2 stories will surely eliminate our views of town and the Riviera, will be a gift to them, and a loss to us, but I think I could live with that. Levy has his three story elements on the front ocean edge, giving that office space or whatever an unparalleled vista and blocking not only the mountains, but any other part of his supposed nice complex. They should be restricted to the back NE corner for elevated elements and or just echoing the Bekins building. After all they have all of the California to play with, on obtaining the biggest bang out of their buck with regards to the views. No one has, or will ever have that privilege, that the California affords them. Why should we feel compelled to give up something that now belongs to all of us. Is that a right, a law that is written, that three story buildings are totally acceptable? If not, no way should we have to accept them.

OO-1

Once you get beyond 101 on the beachside, it should feel BEACHSIDE!!!!!! Not like another corridor of downtown. The skies should open and a far more relaxed element should take over your senses, don't you think??!!?? What's the use of being at the ocean if you can't sense it, until you're on the Wharf? Also, why I fail to see the idea of narrowing the street for two blocks, but that's another issue

I will get down off my soapbox. Once again, I implore you to treasure and protect this spectacular natural asset of mountain views that we all enjoy.

Most Sincerely and Heartfelt,

Kae A. Mori
(Kay)

Kae Mori, March 14, 2001

OO-1. The comments presented do not specifically address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

Ms. Debra Andaloro, Project Planner
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102

Re: Entrada de Santa Barbara

Dear Ms. Andaloro:

There was a time a few years ago when I was not a strong supporter of Entrada de Santa Barbara. But, after reviewing the draft EIR, and paying attention to the changes that Bill Levy and his development team have made to the design to accommodate the requests of the community, I must say that I now support the findings for approving this project. Once this project is built, the lower portion of State Street will be more presentable to visitors and locals, and it will be a landmark addition to our City.

PP-1 I agree with the conclusion that although there will be some impacts on views, they are less than significant. If anything, the view will actually be improved! As it remains now, our waterfront definitely impacts the environment by making it a less than desirable place for visitors, and an attractive site for the homeless to gather. (Not to mention the utility lines that run across the skyline.) Entrada de Santa Barbara will only enhance the area, and the view.

I ask that you deny any further delay on this project and again approve this much needed and desired change.

Sincerely,

Ann Fenton

RECEIVED
MAR 15 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

MAR 15 '01 09:14AM CHICAGO TITLE/SB P.1/1

Ann Fenton, March 15, 2001

PP-1. The comments presented do not specifically address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

RECEIVED
MAR 15 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

March 15, 2001

Planning Commission
City of Santa Barbara

To Whom It May Concern:

I am unable to be at the public hearing on the draft EIR for the Entrada project today. I wanted to add my voice to those protesting the violation of the City's General Plan which states:

"New development shall not obstruct scenic view corridors including those of the upper foothills and mountains viewed respectively from beach and lower elevations of the City."

QQ-1

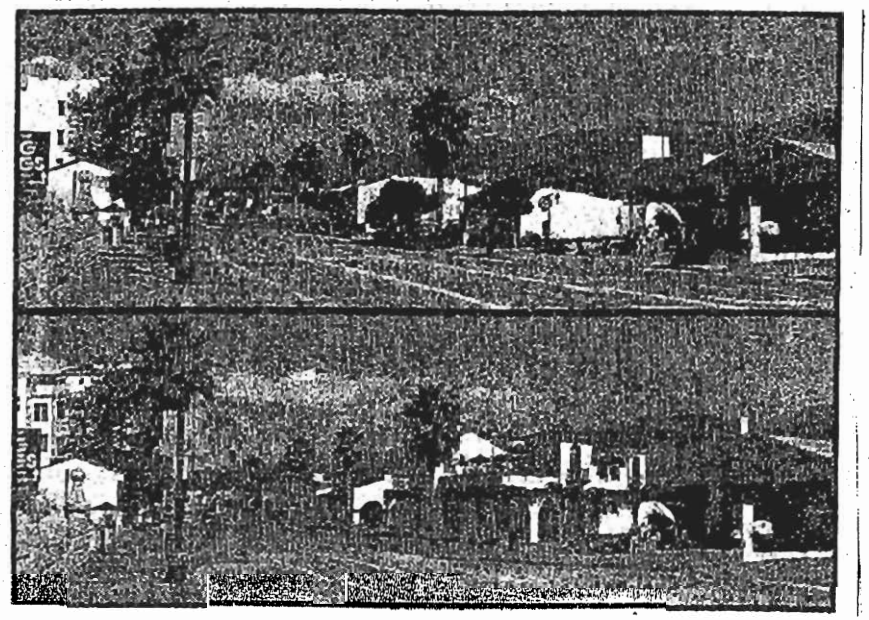
Looking at the picture (attached), how can anyone say the project has "less than significant" impacts on mountain views? The EIR's justifications of the Levy proposal are really ridiculous, and make no sense to anyone using their brain. The bottom line is just that the project is too massive, and will forever change our beautiful, small town ambiance. We have protected our town from outrageous development for 75 years. Can't we continue to protect this special place as others before us have? In your position as planners, you have a duty to carry out the wishes of the majority. I can't believe the majority of Santa Barbara citizens want our precious views to be ruined, and our waterfront area to look like Los Angeles.

Please protect our views and our lovely city.

Sincerely,

Catherine S. Walker

Catherine S. Walker
2917 La Combardura Road
Santa Barbara, CA 93105



Catherine S. Walker, March 15, 2001

QQ-1. The comments presented do not specifically address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

RECEIVED
MAR 15 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Ms. Debra Andaloro
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102

Dear Ms. Andaloro:

As a concerned businessman in Santa Barbara, I felt it my duty to comment on the Draft Focused Environmental Impact Report that was completed for Entrada de Santa Barbara.

RR-1 In reviewing the DEIR, I was somewhat confused to see issues mentioned that do not relate to this study on the views. Issues such as the size, bulk and scale, setbacks, and whether or not the project is "compatible with the existing built environment and the City's vision of the future built environment in relations to the downtown core..." were pointed out in the section of the Executive Summary of the EIR, which has no relevance to CEQA issues.

If this study was to focus specifically on the view impacts, it doesn't seem to me that any of the additional "areas of known controversy and issues to be resolved" have any business being included in this report!

RR-2 Additionally, I would just like to mention that this draft EIR study on the views completely backs the Planning Commission's original findings in 1999 that this project will result in 'less than significant environmental impacts on the public scenic views'.

Thank you for your time and all of your hard work on this project!

Very truly yours,

Stuart D. Farber

Stuart Farber, March 15, 2001

RR-1. The Areas of Known Controversy and Issues to be Resolved required in CEQA Section 15123 address planning considerations beyond the environmental impacts identified under CEQA. These issues will be considered by decisionmakers and City staff during future public hearings. The EIR provides facts to support decisionmaker findings, but does not preclude the Planning Commission or the City Council from additional project considerations.

RR-2. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Andaloro, Debra

From: George Relles [grelles@home.com]
Sent: Thursday, March 15, 2001 9:27 AM
To: dandaloro@ci.santa-barbara.ca.us
Subject: La Entrada

Please pass on these comments to each of the City of Santa Barbara Planning Commissioners:

I oppose the approval of the La Entrada Project. Here are only a few of the reasons.

SS-1 1. There are very few views remaining. Look at what the new Vons will do in eradicating some of the remaining views. Much of the attractiveness of Santa Barbara is in its mountain view and they must be maintained, preserved and enhanced, according to the Local Coastal Plan,
General Plan, Visioning Report and other policies. Any staff judgment that a particular view can be reduced is inconsistent with our local plans and policies.

SS-2 2. The Draft EIR focuses on tourists and visitors, making many unsupported assumptions about what visitors expect to view in Santa Barbara. The Draft EIR improperly ignores the expectations of resident regarding views and really doesn't assess the impact on existing resident.

SS-3 3. The Draft EIR improperly fails to define "scenic," instead changing the meaning throughout the document. We believe that there are currently many scenic views in the waterfront, including those views of the foothills, mountains and ocean, and an existing palm tree or light pole in the foreground of such view really doesn't make them less sceniec, the way large man made structures such as building do.

SS-4 4. Computer models showing that the project would block existing views from State St. and Cabrillo certainly DO indicate a significant impact on views. Conclusions to the contrary are simply a denial of what the eyes of any reasonable person would see.

SS-5 5. Even though the public requested an objective and measurable analysis, the Draft EIR is notable for its lack of quantitative analysis of the view impacts,

SS-6 Please deny approval to this project based on La Entrada's undeniably significant impact on our irreplaceable views

George Relles, March 15, 2001

SS-1. The proposed Ralph's supermarket is not considered in the section 4.6 cumulative impact analysis, as it would not combine with other future probable projects to obstruct views of the Santa Ynez Mountains from the Waterfront or lower State Street. The analysis of project consistency with applicable State and City plans and policies contained in the Revised Second Mitigated Negative Declaration adopted by the City Planning Commission and on appeal by the City Council was found to be legally adequate and approved by the Santa Barbara Superior Court judgment. This EIR reports the findings made by the City regarding plans and policies related to public scenic views. The introduction to Chapter 3.0, Introduction of this EIR, states that, "These decisionmakers will review this project again and are free to re-evaluate this consistency determination...."

SS-2. The EIR incorporates visitor (both local and tourist) expectations of the Waterfront and lower State Street areas based on existing City plans and policies which reflect community values. The visual expectations as identified in existing plans and policies refer to Local Coastal Plan and General Plan Land Use Element (page 31) (identified in the 3/25/99 City Staff Reports [page 10] regarding the connection between the Waterfront and Central Business District) policies that define existing visual characteristics of the Waterfront (please see section 3.3, Local Coastal Plan). For example the Waterfront Area Aesthetic Criteria for New Development Assessment states, "Views to the foothills and mountains are still largely unimpeded by structures; in particular, the views from Stearns Wharf, Chase Palm Park, and East Beach offer unparalleled beauty." "Views are the most important dimension of naturalness. These views are to the ocean, other points along the Waterfront, and to the foothills and mountains. The contrast between the sweep of the coastline and the sweep of the mountains is especially dramatic and heightened by the linear elements of Chase Palm Park and Cabrillo Boulevard." The extent to which the views analyzed in the EIR are consistent with these characteristics is used to determine the relative importance of its public scenic view quality.

SS-3. Please see section 4.3.1.2 for a discussion of the variables considered in evaluating the importance of public scenic views.

SS-4. The EIR analysis is based on impact significance criteria consistent with CEQA. Please see response to comment F-28.

SS-5. The analysis used in this EIR is qualitative in nature, with general criteria identified and descriptive explanation provided for factors and circumstances considered in applying the criteria in specific instances. Therefore, the comparison of important scenic views from the various representative viewpoints selected for analysis in the EIR is qualitative. The comment indicates a preference for a quantitative measure to determine significance. Inherent problems result with this preference in that any given percentage would not accurately reflect impact significance for the variety of individual circumstances.

There are a number of environmental impact categories including cultural resources, biological resources, and visual resources that are resistant to quantification because impact significance is based on a complex set of physical factors that may vary with the individual circumstances of each case. The State CEQA Guidelines recognizes this in Section 15064, as follows: "An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting."

SS-6. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

This page intentionally left blank.

THE HOFFMANN HOUSE
2420 GARDEN STREET SANTA BARBARA CA 93105
TEL: 805-569 2527 FAX: 805-569-2561

Date: March 14, 2001

To: Planning Commission

From: Tanny Keeler

Re: La Entrada

TT-1 Our urban beauty came to us free, but it will not remain for us to pass on to the next generation if we decide to bargain it away, bit by bit, one square foot at a time.

If Mr. Levy is permitted to go ahead there will be others who want the same None of them will ask for a lot, all of them will demand a little: A little bit of sky here and few degrees of mountain there. Santa Barbarans won't know what happened until they look up one day to see that the sky is smaller and the mountains are gone

Santa Barbara will never lose her beauty in one fell swoop; if Santa Barbara loses her beauty she will lose it bit by bit, one square foot at a time. Protect her.

Tanny Keeler

RECEIVED
MAR 15 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Tanny Keeler, March 14, 2001

TT-1. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

March 15, 2001

Debra Andaloro
City of Santa Barbara
Planning Division
P.O. Box 1990
Santa Barbara, Ca. 93102-1990

Chair & Commissioners:

I'm Dale Ferguson, and I'm here representing the Beachside Business Association.

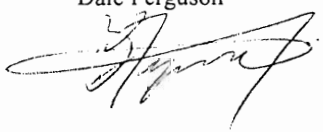
For almost three years, we have heard these same opponents of the Entrada project scream for an EIR. When you approved this project 18 months ago, you did so after many months of public hearings. The project was shaped, refined and scaled back after receiving input from everyone. The court even ruled in the City's favor of all environmental issues as part of the Mitigated Negative Declaration, except a view study.

UU-1 Now, after almost a year, this Focused EIR on views is completed. It confirms that there are no significant impacts to views. I'm not surprised that the opponents still reject these conclusions.

While the opponents continue to use tactic's to delay Entrada, our Beachside Businesses suffer. Please give our businesses and surrounding neighborhoods something to be proud of.

It's time to move Entrada forward. Approve the EIR, and let construction begin.

Dale Ferguson



Dale Ferguson, March 15, 2001

UU-1. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Claudia Madsen
3 Willow Glen Place, Santa Barbara, Ca. 93105
March 15, 2001

Re: Draft EIR on Entrada Project

Chairman White and Members of the City Planning Commission:

The draft Environmental Impact Report shows just how big and obtrusive the Entrada project would be. It blocks mountain views in violation of the City's General Plan, Local Coastal Plan, and Downtown/Waterfront Vision.

VV-1 Our General Plan states: "New development shall not obstruct scenic view corridors including those of the upper foothills and mountains viewed respectively from the beach and lower elevations of the City" (Conservation Element Policy 3.0).

Policy 3.0 says all of our unique mountain views are important, not just a few. It leaves no room for degradation of existing views in the waterfront area. But that's bound to happen unless you require major changes in the Entrada EIR and the project design.

VV-2 EIR photo simulations show that Entrada would obstruct a significant part of the sweeping mountain views seen in the waterfront. Despite such solid evidence, the draft EIR concludes that Entrada has no significant impact. That conclusion must change because it is in blatant conflict with the evidence and the City's view protection policies.

VV-3 If the Levy project is allowed to block mountain views, then other developers will expect the same treatment. The Parker hotel, the Wright hotel, and the Yanonali condo project are all waiting in the wings to chip away our priceless views.

VV-4 In conclusion, the Entrada EIR must be revised to include:

1. A finding of Significant Adverse Impact consistent with the evidence on views.

VV-5 2. An impact analysis provided by the view experts.

VV-6 3. An analysis of project alternatives as requested by the public and required by the evidence.

VV-7 4. New information on traffic impacts.

Thank you for your consideration.

Sincerely, Claudia Madsen
Claudia Madsen

Claudia Madsen, March 15, 2001

VV-1. The analysis of project consistency with applicable State and City plans and policies contained in the Revised Second Mitigated Negative Declaration adopted by the City Planning Commission and on appeal by the City Council was found to be legally adequate and approved by the Santa Barbara Superior Court judgment. This EIR reports the findings made by the City regarding plans and policies related to public scenic views. The introduction to Chapter 3.0, Introduction of this EIR, states that, "These decisionmakers will review this project again and are free to re-evaluate this consistency determination..." Existing state and City plans and policies reflect community values relative to important public scenic views as described in the EIR. The criteria included in the DEIR for determining important public scenic views and the level of impact on important public scenic views is based on these established community values. The definition of "scenic view corridors" does include every view experienced from every location. No adopted state or City plan or policy states that all views of the Santa Ynez Mountains as experienced from lower State Street are scenic and protected public views.

VV-2. The EIR determined that the proposed Entrada project's blockage of Santa Ynez Mountain views from lower State Street would be adverse but not significant. The impact was not substantial as the views were not considered important public scenic views, or that other views experienced from the same viewpoint, that were more representative of the visual context that is protected by adopted state and City plans and policies, would not be impacted.

VV-3. Each proposed project would be assessed relative to the site's specific context relative to the Waterfront, the Santa Ynez Mountains, and state and City plans and policies.

VV-4. Please see response to comment VV-2.

VV-5. Please see response to comment H-1. City staff, as well as the EIR consultants, have extensive experience with the evaluation of potential impacts on this resource.

VV-6. Analysis of project alternatives, besides the No-Project alternative, are only required under CEQA when significant project impacts are identified. Since no significant impacts on important public scenic views were identified in the EIR, no analysis of other alternatives aside from the No Project alternative are required for the purpose of reducing significant impacts.

VV-7. The Santa Barbara Superior Court judgment has determined that the previously prepared Second Revised Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project, except for potential impacts on public scenic views. The Second Revised MND evaluated project impacts on traffic, circulation and safety. This comment does not address the adequacy of the EIR focused on potential consequences to public views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your

concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

However, while not subject to further environmental review, the following information regarding the Urban Crossroads traffic and circulation assessment was provided by Kaku Associates and reviewed by City Transportation Division staff.

Project Trip Generation

The traffic report prepared by Kaku Associates in 1998 used the City of Santa Barbara's approved methodology for investigating the impacts of a new project when that new project would replace existing buildings/land uses on the site. That methodology is as follows:

a. The size and zoning of the existing on-site land uses are summarized. If the on-site buildings are vacant, but could be occupied again without any new discretionary approval from the City, then the building size and land use are added to the on-site total for existing conditions.

b. The trip generation for the existing on-site buildings/land uses is calculated using a reference source approved by the City. In most cases, the Institute of Transportation Engineers *Trip Generation Manual, Sixth Edition* will be used as the City's reference of choice.

c. The same trip generation reference will be used to calculate the trip generation of the proposed land uses on site.

d. In some cases, the trip generation rates found in the *Trip Generation Manual* will be adjusted to reflect conditions at the site. Any adjustments to the standard trip generation rates must be approved by the City.

e. The two trip generation studies described above are compared and the difference in trips is considered to be the net trip generation effect of the proposed project. The traffic impacts of the proposed project are identified based on this net trip generation.

The trip generation comparison included in the Urban Crossroads letter ignores two factors in the above methodology – the definition of on-site land uses and trip reductions.

On-Site Land Uses

The City assumes that if a building can be re-occupied without any additional discretionary approval from the City, it should be counted as "existing square footage," even if it happens to be temporarily vacant at the time of the study. CEQA case law

was presented during the Planning Commission and City Council deliberations on this project that supported the City's interpretation of the definition of "existing on-site land use."

Thus the Urban Crossroads study is incorrect in its definition of the amount of land use on site today. Therefore, the Urban Crossroads study underestimates the trip generation of the existing on-site land uses.

Trip Reductions

The trip generation rates used in the Urban Crossroads traffic study were based on the data found in the *Trip Generation Manual* as required by the City. The *Trip Generation Manual* represents a collection of trip rates from across the United States – most of which reflect suburban, single-use projects that experience little transit or walk-in patronage. Indeed, the data collected for the *Trip Generation Manual* is intended to document the peak automobile generation of each individual land use and, typically, the suburban projects do just that.

However, many projects in Santa Barbara do not behave as single-use suburban developments, and therefore it is appropriate and more accurate to adjust the trip generation rates accordingly. For example, commercial projects along the oceanfront have traditionally received a 25 percent reduction from suburban rates to reflect the pedestrian nature of the State Street/Cabrillo Boulevard corridors.

Visitor-serving projects along State Street and Cabrillo Boulevard corridors are well served by transit and shuttle service, and it is appropriate to assume that the well-utilized shuttle system would serve hotel and retail land uses along these corridors. Again, the suburban trip generation rates found in the *Trip Generation Manual* would not reflect the service offered by the State Street shuttle.

Finally, the Urban Land Institute in its publication *Shared Parking* documented that visitors to a mixed-use project tend to visit more than one land use in the project during a single visit. This capture of multiple trips tends to reduce both the number of trips and the parking requirements of mixed-use projects. Multiple visits in the range of 20-70 percent were found in the ULI study.

The first two trip reduction factors above (walk-in and shuttle) would apply to both the existing and proposed land uses while the third (mixed-use project) would only apply to the proposed project.

The trip reductions applied by Kaku Associates were approved by the City Transportation Division staff prior to their use in the study. They are reasonable and conservative. No additional trip reduction was taken for the mixed-use aspect of the

project, and the walk-in and transit reductions are consistent with reductions approved by the City for other projects in the area.

The Urban Crossroads analysis used the incorrect definition of existing on-site land uses and it failed to take into account legitimate and well-documented trip reductions. Therefore, the Urban Crossroads analysis incorrectly underestimates the number of existing trips and overestimates the number of trips from the new project. The City believes that the trip generation estimate in the Kaku Associates report reflects a more accurate estimate of the net trip generation of the proposed project. Given this, we do not agree with the Urban Crossroads conclusion that the project would impact the intersection of Garden Street/US 101 northbound Ramp.

This page intentionally left blank.

Andaloro, Debra

From: LocationsPlusInc@aol.com
Sent: Friday, March 16, 2001 10:10 AM
To: Dandaloro@ci.santa-barbara.ca.us
Subject: Entrada de Santa Barbara

Dear Debra,

WW-1 I am a Santa Barbara Location Company that provides services for fashion catalog production companies. The reason so many photographers and photo crews come to Santa Barbara is because of our weather and our rural town atmosphere. To allow another megalithic structure to be built, would cut off Santa Barbara's wonderful mountain views. Not only would Santa Barbara lose its' mountain views, consider the

WW-2 traffic impact! Let us not forget that we already have weekend gridlocks in the summer...

WW-3 I think this entire project should be voted on by the residents of Santa Barbara and public, NOT the people that Bill Levy is waltzing around the park. I believe that if the public were given the opportunity to vote on this contraversial matter, it would be voted against. Please consider this in the EIR Review.

Kind Regards,

John Varner
805/ 969-0887

John Varner, March 16, 2001

WW-1. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

WW -2. The Santa Barbara Superior Court judgment has determined that the previously prepared Second Revised Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project, except for potential impacts on public scenic views. The Second Revised MND evaluated project impacts on traffic, circulation and safety. This comment does not address the adequacy of the EIR focused on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

WW-3. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Mr. W. A. Obers
162 EUCALYPTUS HILL CIRCLE ~ SANTA BARBARA, CA 93103

CITY OF S.B. PLANNING COMMISSION
P.O BOX 1990
S.B., CA 93102-1990

DEAR PANNING COMMISION MEMBERS;

SINCE MY FIRST EXPOSURE TO THE ENTRADA de SANTA BARBARA PROJECT, I'VE BEEN A SUPPORTER ITS BEEN MORE THAN TWO YEARS GOING ON THERE.

AFTER WITNESSING MANY PLANNING & COUNCIL MEETINGS, I HAVE NOT CHANGED MY MIND. THERE HAVE BEEN MANY CHANGES MOST OF WHICH IMPROVED THE PROJECT.

XX-1

I'M CERTAIN A MAJORITY OF OUR CITIZENS AGREE THAT STATE STREET IN THAT AREA NEEDS A FACE LIFT.

THE ENTRADA de S.B. WILL DO IT.

PLEASE LET IT GET STARTED, I'M 80 PLUS AND WOULD LIKE TO SEE IT OPEN.

THANK YOU

W.A. Obers

REC
MAR 1 0 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

W.A. Obers, March 15, 2001

XX-1. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration 'during their review of the project.

Kay Woolsey, March 16, 2001

YY-1. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Kay Woolsey
956 Mission Canyon Lane
Santa Barbara, CA 93101

March 16, 2001

RECEIVED
MAR 19 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Planning Department
630 Garden Street
Santa Barbara, CA 93101

Attention: Debra Andaloro
Re: La Entrada project

Dear Ms. Andaloro;

I am writing this letter in response to the photographs in this morning's Santa Barbara News Press of the impact of La Entrada project. For some time, I have been concerned about the magnitude of this project, and the negative effect it will have on the city and, especially, at the entrance to our city. After all of the "visioning" process carried on by local citizens, it seems that nothing has been accomplished.

YY-1

The photographs show the reality of erecting massive, tall buildings fronting the streets and producing a very claustrophobic feeling. No longer will a resident or visitor have a welcoming feeling of a town that appreciates its views, space and unique surroundings, or be able to stroll through an area with many beautiful vistas. By crowding out the natural elements, and packing in buildings which mostly will support visitor needs, the project will take away from residents' appreciation and use of their own town. I see it as setting a "standard" that all future building in the city will take, continuing the diminishing of our individuality and the unique asset of our natural setting.

I would like to add my comments and request to reconsider the size of this project to the many who share my view. I believe it is critically important that Santa Barbara keep its integrity and not become just another generic Southern California coastal city.

Sincerely,

Kay Woolsey

Andaloro, Debra

From: pete lafollette [plafollette@hotmail.com]
Sent: Tuesday, March 20, 2001 10:27 AM
To: dandaloro@ci.santa-barbara.ca.us
Subject: la entrada project

Dear Debra

ZZ-1 City Policies: Santa Barbara's Local Coastal Plan, General Plan, Waterfront Visioning Report, and other city documents are clear that all views of the foothills, mountains and ocean are important and, in fact, must be maintained, preserved and enhanced. Any City staff judgment as to whether a particular view is worth preserving is inconsistent with our local plans and policies.

ZZ-2 All views of the ocean and mountains from the waterfront are scenic: A palm tree, telephone pole, or other narrow and minor obstruction does not negate the importance or signficance of a view, thereby opening the door for development.

ZZ-3 The view impacts are significant. Alternatives and mitigation measures must be analyzed to reduce the impact to a less than signficant level.

Existing views: the draft EIR does not adequately describe existing foothill, mountain and ocean views, including:

ZZ-4 1)specific peaks, the ridgeline, the apparent vegetation and rock outcroppings, etc. that describe the foothill and mountain views from the waterfront, and 2) the palm trees, open

ZZ-5 sky and meeting of foothills and ocean, etc. that describe the ocean views from the waterfront.

ZZ-6 Other issues: The City must conduct subsequent environmental review on a particular issue if new information, which was not known at the time the previous environmental document was adopted, shows that the project will have one or more significant effects not discussed in the previous document. In this case, new information on the U.S. Army Corps of Engineers' Mission Creek Flood Control Project and on the Local Planning Guidance on Tsunami Response constitutes two areas of new information showing that the project will have significant effects on biological and water quality and traffic and safety, respectively.

Sincerely,

plafollette@hotmail.com

Get your FREE download of MSN Explorer at http://explorer.msn.com

Pete LaFollette, March 20, 2001

ZZ-1. The analysis of project consistency with applicable state and City plans and policies contained in the Revised Second Mitigated Negative Declaration adopted by the City Planning Commission and on appeal by the City Council was found to be legally adequate and approved by the Santa Barbara Superior Court judgment. This EIR reports the findings made by the City regarding plans and policies related to public scenic views. The introduction to Chapter 3.0, Introduction of this EIR, states that, "These decisionmakers will review this project again and are free to re-evaluate this consistency determination..." Existing state and City plans and policies reflect community values relative to important public scenic views as described in the EIR. The criteria included in the DEIR for determining important public scenic views and the level of impact on important public scenic views is based on these established community values. The definition of "scenic view corridors" does include every view experienced from every location.

ZZ-2. The majority of views of the Santa Ynez Mountains impacted by the proposed Entrada project would be from lower State Street, and not the Waterfront. No adopted state or City plan or policy states that all views of the Santa Ynez Mountains as experienced from lower State Street are scenic and protected public views.

ZZ-3. There is no specific justification offered for the conclusion presented. Analysis of project alternatives, besides the No-Project alternative, and identification of mitigation measures are required only to minimize any potentially significant project impacts identified in the EIR. Since no significant impacts were identified in the EIR, no other alternatives aside from the No Project alternative and no mitigation measures are required.

ZZ-4. Specific topographic features within the Santa Ynez Mountain ridgeline identified in the comment are not addressed in City policies regarding protection of visual resources. They are not considered discrete elements in this analysis.

ZZ-5. The characteristics of the visual resources associated with the Waterfront are identified in section 4.1.1.1, and Figure 4-3. They are discussed in section 4.4. where these visual resources are experienced in the 19 viewpoints analyzed.

ZZ-6. The Santa Barbara Superior Court judgment has determined that the previously prepared Second Revised Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project, except for potential impacts on public scenic views. The Second Revised MND evaluated project impacts on traffic, circulation and safety. This comment does not address the adequacy of the EIR focused on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

Responses to issues that are not subject to further environmental analysis are provided below for information. CEQA requires additional environmental review (section 15162) only when new information is identified that would result in a previously undisclosed significant impact or identification of a significant impact that was not previously identified as significant.

Tsunami Planning Issue

The commentor alleges that new information of substantial importance, which was not known at the time the Second Revision to the Initial Study was approved, regarding tsunamis and their potential to result in significant impacts must be analyzed in the EIR.

The Second Revision to the Initial Study (Pages 19 and 20) analyzed the potential for the Entrada project to result in or expose people to tsunamis and determined that no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project. The Entrada project is located at approximately 10 feet MSL and according to the City's Master Environmental Assessment maps is within the tsunami run-up area. Because the City requires buildings to be constructed to the Uniform Building Code (to withstand 100 year events) and because adequate evacuation plans are in place for the Waterfront area, no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project.

Since the preparation of the Second Revision to the Initial Study and adoption of the Entrada project's Mitigated Negative Declaration (August 1999), new information regarding tsunamis has been published. The California Office of Emergency Services has prepared tsunami inundation maps which estimate the run-up from a worst-case tsunami (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously). The California OES recognizes that its tsunami maps are not particularly useful for land planning, since the assumptions used to prepare the OES map (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously) exceed the design criteria for all development except nuclear facilities. The California OES has also produced the Local Planning Guidance on Tsunami Response (no date). The purpose of this document is to "...assist local governments in the initial development of a tsunami response plans and the procedures necessary to deal with a tsunami's impact on their communities."

Neither the OES tsunami inundation maps nor the document Local Planning Guidance on Tsunami Response have identified new information of substantial importance that will result in new significant environmental effects which were not discussed in the Second Revision to the Initial Study.

In addition, the report Seismic Sea Wave (Tsunami) Potential, dated March 28, 2001 prepared by Michael Hoover, Consulting Geologist-Hydrologist (see Appendix G), evaluated the effects of a locally generated tsunami resulting from a maximum earthquake. Such an earthquake (Magnitude 7.4) could cause a wave height of nine to twelve feet and result in the Entrada

project experiencing minor flooding. If such an earthquake occurred at high tide (likely recurrence frequency of 600 years) it could result in the Entrada project experiencing significant flooding, but that the structures would not be destroyed and because they are proposed to be built of steel, could be used as evacuation facilities.

The Seismic Sea Wave (Tsunami) Potential also evaluated evacuation of the Waterfront relative to tsunamis. Distant source tsunamis result in relatively small (1 to 5.5 feet) waves in Santa Barbara, and lengthy warning times (usually hours) providing ample evacuation time. An earthquake locally of sufficient Magnitude to generate a significant tsunami would likely also cause collateral damage to roads, liquefaction, slope failures, bridge failures, and scattering of building debris on roadways such that evacuation from the Waterfront via automobile would be impossible. Evacuation from the Waterfront area would be via foot to higher ground (i.e. to the top of the Santa Barbara City College stadium). No change in evacuation conditions would result from reducing the number of vehicle traffic lanes on State Street. Due to the low probability of tsunami occurrences and limited scope of the project, no significant impact would result from exposure of persons to tsunami risk.

Mission Creek

The commentor asserts that there is new information of substantial importance that was not known at the time the Second Revision to the Initial Study was approved regarding the proposed Lower Mission Creek Flood Control Project and its potential, together with the Entrada project, to result in significant impacts on the Mission Creek environment, thereby impacting the water environment, riparian habitat and sensitive species within the creek.

The Second Revision to the Initial Study (Pages 21 and 44) indicated that the proposed project will not have a significant impact on the natural communities or wetland habitats within Mission Creek, nor will changes to the drainage flow of Mission Creek occur as a result of the proposed project.

At the time the Second Revision to the Initial Study was prepared and approved (August 1999), the preferred plan for the proposed Lower Mission Creek Flood Control Project was not known. However, in anticipation of changes to the Mission Creek stream channel, in conjunction with the proposed Lower Mission Creek Flood Control Project, the Entrada de Santa Barbara Conditions of Approval contained in City Council Resolution No. 99-098 contain Condition G.13 which states:

G. Prior to issuance of demolition, grading or building permit for the proposed project:

13. The applicant shall review construction requirements with the Public Works Department to ensure that the development on Site A is consistent with approved plans for the improvement of Mission Creek at the time of project construction on

Site A to the extent feasible. The Owner shall make all feasible changes to the plans as reasonably required by the Public Works Department. Costs for plan revisions shall be borne by the applicant.

In September 2000, the US Army Corps of Engineers released the Feasibility Report, together proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project. The recommended plan according to the Feasibility Report is Alternative 12. Appendix H shows Area A in this alternative as previously approved with the existing alignment and the proposed Alternative 12 alignment of Lower Mission Creek superimposed. As indicated on this Mission Creek Alignment alternative, if the Alternative 12 alignment of Lower Mission Creek is ultimately approved the proposed buildings on Area A (as previously approved) would be at the top-of-bank of Lower Mission Creek. However, as also indicated on this plan, Alternative 12 includes the demolition of buildings adjacent to the portion of the building on Area A closest to Mission Creek. In addition, a habitat restoration area is proposed between the west elevation of the building on Area A and the proposed top-of-bank of the Lower Mission Creek. According to the proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project, these components of Alternative 12 were found to offset any impact resulting from the building on Area A encroaching within the required 25 foot setback from the top-of-bank of Lower Mission Creek.

The Lower Mission Creek Flood Control Project has yet to be considered for approval, its final design has not been determined and remains unknown at this time. In addition, the staff recommendation for consideration of the Entrada project on its land use and design merits would include a condition similar to, if not exactly the same wording as, City Council Resolution No. 99-098, Condition G.13 described above.

Therefore, while the Lower Mission Creek Flood Control Project proposed alignment has been further refined since preparation of the Second Revision to the Initial Study, this additional information will not result in new or substantially more severe significant environmental effects which were not discussed in the Second Revision to the Initial Study.

This page intentionally left blank.

MARCH 17, 2001

SUBJECT: LA ENTRADA DE SANTA BARBARA

TO: MR. GRANT HOUSE, CHAIR
SANTA BARBARA CITY PLANNING COMMISSION
CITY PLANNING DIVISION
630 GARDEN ST., SANTA BARBARA, CA 93101

DEAR MR. HOUSE:

GOOD PLANNING IS VERY IMPORTANT TO SANTA BARBARA, RESIDENTS AND VISITORS ALIKE. FOR OVER 200 YEARS SANTA BARBARA HAS GROWN ON THE NARROW STRIP OF LAND THAT EXISTS BETWEEN THE COAST RANGE MOUNTAINS AND THE SEASHORE. THE DEVELOPMENT OF THE CITY IS ADMIRED NATIONWIDE BY THOSE WHO ARE FORTUNATE TO LIVE HERE AND/ OR VISIT HERE.

THE CONCERN OF THE MOMENT IS THE MATTER OF VIEWS (MAINLY MOUNTAIN) DUE TO THE PROPOSAL OF CREATING THE ENTRADA DE SANTA BARBARA NEAR THE WATERFRONT BY LOCAL DEVELOPER WILLIAM LEVY.

TO REMIND YOU -- GOOD VIEWS ARE REALLY INVOLVED FROM THE GROUND UP! CAREFULLY PLANNED AND DISCUSSED ARCHITECTURALLY DESIGNED DWELLING ACCOMODATIONS FOR VISITORS ARE THE FOCUS OF CONCERN. IN THE ENTRADA WE HAVE ATTRACTIVE MEDITERRANEAN STYLE ARCHITECTURE IN THE SPANISH MOTIF -- PLAZAS AND SET-BACKS, VARIED HEIGHTS OF BUILDINGS, OFF-STREET PARKING PROVIDED. ALL VERY MUCH IN TUNE WITH THE REST OF THE "DOWN-TOWN" AREA WHICH IS HIGHER UP ON STATE STREET.

NOW, YOU AND THE COMMISSION ARE ASKED TO APPROVE THE COMPLETION OF THIS PLANNING EFFORT THAT HAS GONE THROUGH MANY POSITIVE SUGGESTIONS BY CITY STAFF, AND ADVISORY PERSONS INCLUDING PUBLIC DISCUSSION.

IN MY HUMBLE OPINION AS SOMEONE WHO HAS BEEN INTERESTED IN THE ONGOING PROGRESSION OF THIS PROJECT BEFORE THECITY RESIDENTS, I FEEL THE ENTRADA DE SANTA BARBARA AS NOW PLANNED WOULD ADD A GREAT DEAL TO THE BEAUTY OF OUR SMALL TOWN BY THE SEA. PLEASE RECOGNIZE ITS VALUE AND PERMIT THE OWNER OF THE LAND TO BRING IT TO LIFE!

SINCERELY,

Sue Higman

SUE HIGMAN (LIFELONG RESIDENT)

3408 CLIFF DRIVE
SANTA BARBARA, CA 93109
PH: 687-0687

AAA-1

RECEIVED
MAR 20 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

AAA-1

I will write a special comment to the Commission before the comment period is over.

Mr. Grant - This is my original "talking" sheet - I think the green sheet is a little more inclusive!

Name: Sue Higman - Native Santa Barbaran

Thank you for listening to public comments! Grant planning is very important to the continued admiration world wide of the beauty of the city of Santa Barbara.

The EIR shows me that there is upgrading of the south end of State Street in the architectural style of the proposed Entrada de Santa Barbara.

The matter of views - Views start from the ground up! The Entrada we have attains Mediterranean architecture - Plazas and set backs, varied heights of buildings - parking on lower areas! Keep, Chase would have loved it! Thank you again

Good work

F-280

Sue Higman, March 20, 2001

AAA-1. The comments presented do not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Jennifer H. Scott
835 Arbolado Road
Santa Barbara, CA 93103

City of Santa Barbara Planning Commission
Attn: Deborah Andaloro
630 Garden St.
Santa Barbara, CA 93101

Dear Ms. Andaloro,

I just wanted to make my opinions known one more time. I have written to Mayor Harriet Miller previously.

BBB-1

When we moved to Santa Barbara in 1982, my husband and I would go to the pier and comment that that had to be one of the most beautiful places on earth as we could see the ocean on one side and the mountains on the other side. Slowly the mountain views have been disappearing. I think it would be criminal to impact them from the waterfront. Property owners should not be able to do anything they want with their property, especially if it lowers the quality of life of everyone else who lives in SB. I couldn't build anything I wanted on my property and impact my neighbors. I often wonder why developers and special interests are rewarded to the detriment of other citizens. I think the Chromatic Arch and the Skateboard Ramps are a travesty; I get mad every time I drive past them.

Thank you.

Sincerely,

Jennifer Scott
March 16, 2001

RECEIVED
MAR 20 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Jennifer H. Scott, March 20, 2001

BBB-1 The comments presented do not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

3646 Campanil Drive
Santa Barbara, CA 93109

18 March 2001

Santa Barbara Planning Commission
c/o City Hall
735 Anacapa Street
Santa Barbara, CA 93102

Subject: Entrada

Gentlemen:

CCC-1 We feel the Entrada as presented in the Santa Barbara News Press on 16 March will not enhance Santa Barbara, but will go far to make our city join the rest of the LA Basin--overbuilt and far less lovely.

CCC-2 The high density traffic at this location makes a project of this magnitude seem ludicrous particularly if it is necessary to reduce the existing four lanes to two lanes to make it work.

CCC-3 The area has already upgraded by landscaping and business renovation. The addition of a large time-share will only increase traffic to this congested area. There are also inherent problems with the time-share concept; i.e., after a few years, time share owners have a hard time selling their property. This produces a strong potential for degradation of the property and, of course, makes conversion to full time condominiums look attractive. We surely do not need this type of business on one of the most colorful and congested streets in Santa Barbara.

CCC-4 And worse, it looks terrible. It cuts off the view.

CCC-5 Please turn down the project. It is an unattractive and inappropriate development for this area.

John M. and C. Barbara Johnson

RECEIVED
MAR 20 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

John M. and C. Barbara Johnson, March 18, 2001

CCC-1. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

CCC-2. The Santa Barbara Superior Court judgment has determined that the previously prepared Second Revised Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project, except for potential impacts on public scenic views. The Second Revised MND evaluated project impacts on traffic, circulation and safety. This comment does not address the adequacy of the EIR focused on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

Although the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500 foot long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing <u>does not</u> reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free flow roadway capacity changes from approximately 2,800 to 1,400

vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when lots of pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at LOS B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

CCC-3. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

CCC-4. The comment presented does not specifically address the adequacy of the EIR analysis. It will be forwarded to decisionmakers for consideration during their review of the project.

CCC-5. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

This page intentionally left blank.

March 18, 2001

Santa Barbara Planning Commission
C/o City Hall
735 Anacapa Street
Santa Barbara, CA 93102

Dear Santa Barbara Planning Commission:

This letter is in reference to the proposed Entrada Project. I have been a resident of Santa Barbara since 1967. In all these years, I have never written to your commission. Now I must. I am compelled to voice my opposition to this project. The Entrada Project planned for lower State Street is entirely inappropriate in several ways, inlcuding:

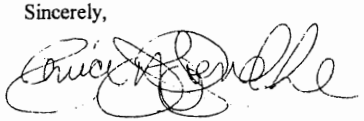
DDD-1 1. It's profile is too high – the pictures published in the 3/16/01 issue of the Santa Barbara News Press show clearly how its two and three story buildings will obstruct mountain and ocean views.

DDD-2 2. It eliminates two needed lanes of traffic on State Street.

DDD-3 3. It places timeshare units on one of the choicest pieces of real estate in the city. This property should be utilized by the many, not by the few – and besides, timeshares have traditionally been risky ventures. More often than not, they fail. If/when these timeshares fail, they will likely fall into decay, and ultimately have to be converted to some other use.

This project is not right for Santa Barbara. I urge you to reject it!

Sincerely,



Janice J. Dependahl
3857 Crescent Drive
Santa Barbara, CA 93110

RECEIVED
MAR 20 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Janice J. Dependahl, March 18, 2001

DDD-1. The comment presented does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

DDD-2. The Santa Barbara Superior Court judgment has determined that the previously prepared Second Revised Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project, except for potential impacts on public scenic views. The Second Revised MND evaluated project impacts on traffic, circulation and safety. This comment does not address the adequacy of the EIR focused on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

Although the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500 foot long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing does not reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free flow roadway capacity changes from approximately 2,800 to 1,400

vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when lots of pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at LOS B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

DDD-3. The comment presented does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

This page intentionally left blank.

March 18, 2001

Santa Barbara City Planning Department
630 Garden Street
Santa Barbara, CA 93101

Planning Department:

You asked for public input on the ~~Entrada Project~~.

EEE-1 The Entrada Project WILL block and impact views! Photos in Friday's News-Press simply verified what we all suspected. . Not only will mountain views be lost forever, but the large buildings (some 2 & 3 stories high) will change the feeling of our waterfront. We need smaller buildings with more open spaces.

EEE-2 My husband and I are regular walkers from our home on the Mesa to the East Beach area. We have already lost some of our magnificent mountain views from the massive "addition" to the Harbor View Inn. Another massive project underway, the supermarket, at De la Vina and Carillo, has also destroyed mountain views. The public continues to be dwarfed & claustrophobic by decisions made by the City Council/City Planners. The time is now to protect our precious views.

EEE-3 Why are we offering time-shares for tourists when we need condominiums for local working people?

Sincerely,

Derry Godar

Derry Godar
562 La Marina
Santa Barbara, CA 93109

RECEIVED
MAR 20 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Derry Godar, March 18, 2001

EEE-1. The EIR determined that the proposed Entrada project's blockage of Santa Ynez Mountain views from lower State Street would be adverse but not significant. The impacts were not substantial as the views were not considered important public scenic views, or because other views experienced from the same vantage point were more representative of the scenic context that is protected by adopted City plans and policies and which would not be impacted.

EEE-2. The contribution to the cumulative impact on visual resources resulting from the development of the Harbor View Inn expansion was considered in section 4.6. (project No. 11). The proposed Ralph's supermarket is not considered in section 4.6 as it would not combine with other future probable projects to obstruct views of the Santa Ynez Mountains from the Waterfront or lower State Street. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

EEE-3. The comment presented does not address the adequacy of the EIR analysis. Housing is not a permitted use in the HRC-II zone district and is inconsistent with the LCP. In addition to the fiscal constraint to housing development due to high land values in the coastal zone, per direction of the Coastal Act and Coastal Commission, City zoning for the area has to designate the area for specified types of coastal uses, focused on visitor-serving and ocean-dependent commercial types of uses. The City has a long history over past decades of trying to include housing in the mix, and in fact housing was previously proposed on the parcel, but the Coastal Act and Commission have not considered housing to be a high priority for use of limited coastal resources.

316 East Los Olivos Street
Santa Barbara, CA 93105

March 20, 2001

Planning Commission
City of Santa Barbara
630 Garden Street
Santa Barbara, CA 93101

Re: Comments on EIR for La Entrada

We strongly disagree with the City's Environmental Impact Report for La Entrada de Santa Barbara. We feel that the conclusion that there is no significant impact on views by the project is subjective and biased.

FFF-1 Look at the three views attached here. Can the Planning Commission really say this is an insignificant obstruction of mountain views? To compare the "obstruction" of telephone and traffic light poles to the bulk of three story buildings and say that views are already compromised is absurd.

FFF-2 If this project proceeds as now designed, we can look forward to having all our views at the waterfront obstructed because a major precedent will have been set and the city will not be able to refuse later developments.

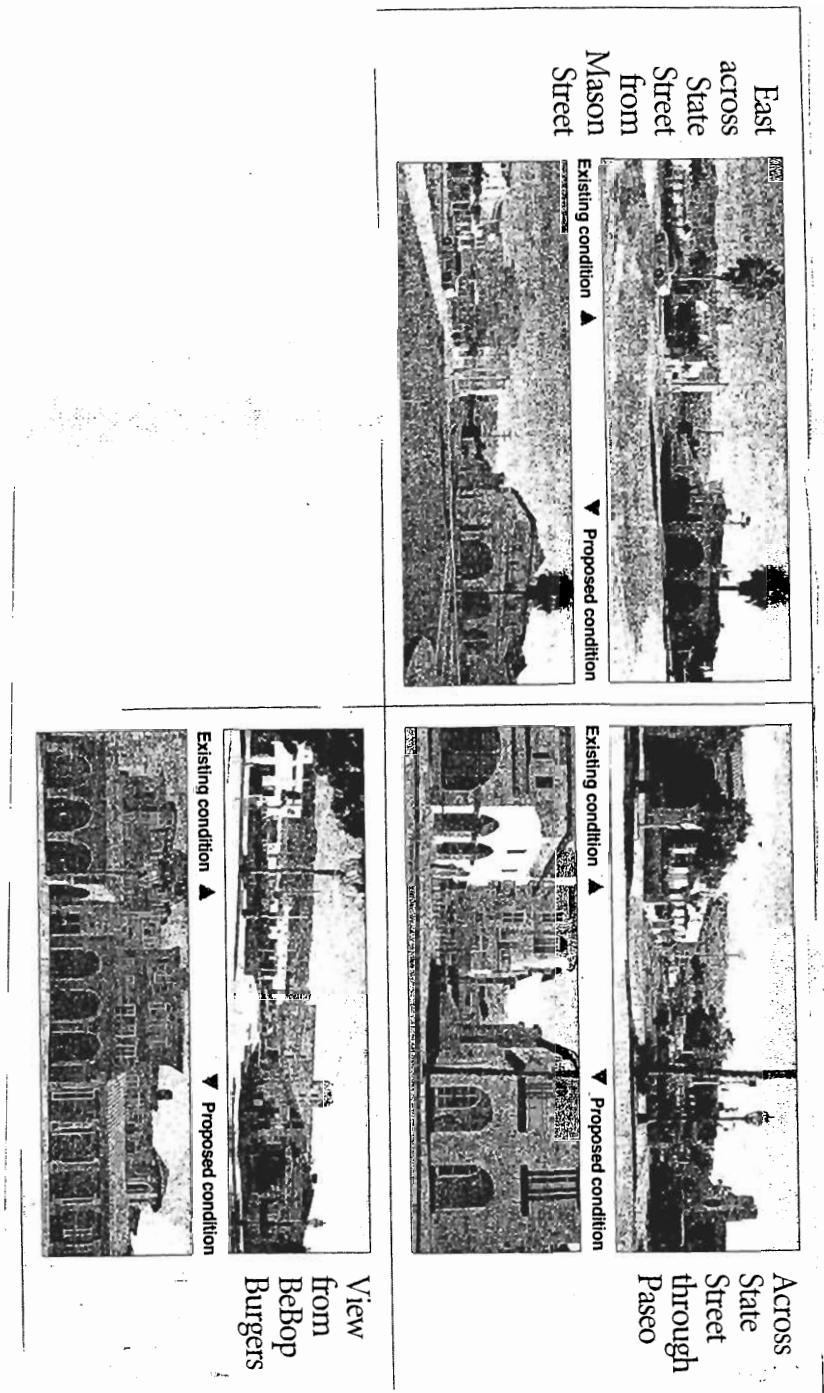
FFF-3 Since our main industry is tourism, do not forget that tourists come here to enjoy our natural setting and get away from urban congestion and dense buildings.

We hope you will attempt to limit this project to two stories.

Sincerely,

Joel and Vasanti Fithian

RECEIVED
MAR 21 2001
CITY OF SANTA BARBARA
PLANNING DIVISION



Joel and Vasanti Fithian, March 20, 2001

FFF-1. The view impact assessment in section 4.4 involves evaluation of the existing setting. The magnitude, intactness and distinctiveness are relevant aspects of assessing the existing visual setting. These variables have been identified by national planning organizations as appropriate considerations in visual analyses (please see section 4.3.1.2). "Intactness" is described as the extent to which a view is interrupted by existing structures, street palm trees, and street lights. The project impact is the change to the view. This analysis identifies that the change in the view would not be substantial. Existing intrusions diminish the scenic quality and importance of the view.

FFF-2. The comment presented does not address the adequacy of the EIR analysis. The visual context of the project site, as identified in existing City plans and policies, is addressed in the impact assessment. Visual character and architectural compatibility will be considered by the City decisionmakers and the Historic Landmarks Commission with respect to the land use merits of this and other projects that may be proposed in the future. Future developments will be reviewed on a case-by-case basis.

FFF-3. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

City of Santa Barbara Planning Division
P.O. Box 1990
Santa Barbara, CA 93102

Dear Ms. Andaloro:

GGG-1

I am writing to you as a life-long resident of Santa Barbara who is extremely distressed at the enormity of the Levy project proposed for lower State St.; and I am particularly worried about the adverse affects of narrowing the street. I realize it's the property owners' right to develop his property, but it is up to the City to see that the buildings don't overwhelm the area. For something as major as this, a vote of the people would have been in order. This project will completely change the small town atmosphere of our beach front area, and narrowing State St. will make congestion there much worse. We must keep the traffic moving, - not clog it up as will happen with fewer lanes. If people are worried about pollution they should not want cars idling up and down a narrow street. Allowing all those time shares with lockouts that will bring many more cars to the vicinity sounds like a nightmare to me.

I have been working very hard with Streets R Us , collecting signatures on our petitions regarding street narrowing in our city. We have been extremely successful and I can state that without question the vast majority of signers are not only unhappy at the prospect of narrower streets - they hate the Entrada plan.!

If La Entrada is approved after all this controversy I sincerely hope that at least State Street will be left as it is. With everyone clammoring for more open spaces I can't image why the City would want to squeeze down the streets as well as put up enormous buildings along the way creating a canyon effect.

Thank you for your consideration.

Joan L. Jennings

Joan L. Jennings
3618 Rockcreek Road
Santa Barbara,. CA 93105

March 19, 2001

RECEIVED
MAR 21 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Joan L. Jennings, March 19, 2001

GGG-1. The Santa Barbara Superior Court has determined that the previously prepared Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project except for potential impacts on public scenic views. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

Although the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500 foot long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing does not reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free flow roadway capacity changes from approximately 2,800 to 1,400 vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the

intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when lots of pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at LOS B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

This page intentionally left blank.

Andaloro, Debra
From: Ralph Fertig [rhfertig@sb.net]
Sent: Thursday, March 22, 2001 6:46 AM
To: Debra Andaloro
Subject: YES on La Entrada

To: Debra Andaloro, Project Planner
La Entrada de Santa Barbara
Planning Department
City of Santa Barbara

I have lived in the South Coast for over three decades, I have commuted daily to and from work over 13 blocks of Lower State Street in traffic for 10 years, and I often travel to the State Street/Waterfront area other times. The area is a sad mixture that is not representative to the beauty of architecture and space that has been carefully cultivated in Downtown Santa Barbara. I feel that La Entrada will definitely uplift the area.

"Views" have been taken, in my opinion, as a flimsy reason to rally against the project. I'm unsure why so many have been so vocal in opposition. If "views" are the sole reason to judge upcoming construction, nothing would be built and our city would not exist at all.

HHH-1

I keep thinking of the Japanese philosophy that a view should be gradually perceived in well-considered glimpses here and there, not thrust totally upon people. I believe that La Entrada offers that thoughtful philosophy rather than the Western ideal that "all is best."

Some claim that the EIR "computer-generated" pictures of La Entrada are "unrealistic" in terms of traffic. It seems to me that those people rely on emotions rather than the photographic source. The motor vehicles in the photos are not altered or faked in any way (except in one photo, a truck was removed because it blocked most of a new building).

On February 14 at 7:40 rush hour I traveled up State Street to work and counted 10 motorists in those four traffic lanes over four blocks between Cabrillo and Gutierrez. That's the way it always is each morning, virtually empty, and that's exactly what the photos show. I passed through again after work during the 5:30 "rush hour" and counted 16 motorists in the same space. Sure, on holiday summer weekends, there are more people walking, cycling, and driving there. But these rare times don't warrant the alarm the some people have expressed.

HHH-2

I personally believe that La Entrada will provide a needed improvement to Lower State Street. I've looked at the utility poles and lines that I'm pleased will be removed. I'm glad that the ugly car rental lot will be replaced by a handsome building worthy of our town. I'm pleased that parking, like in our Downtown, will be in the rear. I can envision the new Visitor's Bureau building near the Amtrak Depot. The widened sidewalks will attract people like those in our Downtown do, and the reduced street lanes will make it safer for pedestrians to cross.

HHH-3

Out of the structures in La Entrada group, however, the only one that really stands out in the EIR as massive is the existing Californian Hotel. I've heard no complaints about it and I'm frankly glad. And thankful that somebody will be investing millions to renovate the handsome, but earthquake-susceptible building.

HHH-4

As for widening the sidewalks and narrowing State Street to two lanes, it's a logical extension of our very successful, very popular Downtown State Street. After all, those first 4-lane blocks are vestigial left-overs in the first two and a half miles of State Street from the Wharf. Everything else is two lanes.

HHH-5

Complaints about La Entrada remind me of the intense opposition that Paseo Nuevo plans generated, or the doom-sayers who predicted massive gridlock and accidents at the Milpas roundabout. They simply don't know how people behave. It's vital to plan our community decades in the future and review any proposed changes relative to that vision. But now that the draft EIR has been published on La Entrada, let's forego the knee-jerk rejections, let the Planning Commission fine-tune the project, and move on toward a better community.

HHH-6

Ralph Fertig
1569 Sycamore Canyon Road
Santa Barbara, California
home 962-1479
work 966-6424 x15
email rhfertig@sb.net

Ralph Fertig, March 22, 2001

HHH-1. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

HHH-2. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.HHH-3. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

HHH-4. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

HHH-5. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

HHH-6. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

Date: **March 23, 2001**

To: **Planning Commission**

From: **Laura Hout Mayer**

Re: **PUBLIC COMMENT re Levy project -- "La Entrada"**

III-1 A Santa Barbara resident since 1959—I feel compelled to laud my native heritage like everyone else—I heartily protest the notion that the "entrance" to our fair city will be views of bulky time-share units *a la* Orange County. First of all, this is not the entrance to Santa Barbara, second, this is not "mixed use," this is *mis-use*. Do we want to obliterate our skyline with the message that no one can afford to live here, they can only afford to visit? True mixed use creates community, whereas tourism, however valuable to our tax base, caters to high class transients.

III-2 And reducing State Street to two lanes is ridiculous. What makes sense is to close it off entirely, create a pedestrian zone, and reap the benefits like Santa Monica does with its Third Street Promenade. Eighty-one time-share units will most certainly contribute traffic, noise and pollution to our waterfront. Crushing this into two lanes is sheer stupidity.

III-3 If we truly *are* a world class city, we should demand world class land use policies and architecture. Our forefathers and mothers did this, and their vision gave us the Courthouse, the Arlington and the El Paseo. They realized that a city had to be created with a unified whole in mind, not piecemeal, like the Levy (and Parker) projects. "El Paseo... effectively demonstrated what could be accomplished through a unified Hispanic approach to planning, architectural landscape and architecture." (Santa Barbara, El Pueblo Viejo, page 15)

III-4 Some argue that such buildings cannot be built today, and the main reason is the automobile. In 1964, the writers of Santa Barbara's original General Plan warned against this, saying, "There is a growing awareness that the automobile is getting out of hand; that its influence on the urban scene is becoming dictatorial rather than beneficent." They recommended that State Street become a pedestrian zone (see rendering on page 37 of the General Plan). Anyone conversant with New Urbanism (check out *cnu.org*) knows that "mixed use" is more than a fancy buzz word. All around the U.S. developers are busy cashing in on consumer demand for a mix of residential and commercial, resulting in lively, walkable communities. Residential, it must be pointed out, is not the same as time share!

III-5 Land use policies must be revised when they no longer serve the public. The very fact that this project is being considered is a travesty. Law, unlike medicine, is mutable. When the heart stops, you die. But when laws stop working, you can change them. In submitting their report, our General Plan writers stated, "We recommend that the Plan be kept under continuous review, utilizing it as a living, dynamic device to help maintain orderly and economically sound relationships between land use and public facilities."

There *is* no other location in the world comparable to the junction of State Street and Cabrillo Boulevard. We have every potential to rival those European cities whose bustling waterfronts we claim to admire. If we truly *are* a world-class city, we should demand—in the tradition of Santa Barbara—world-class land use laws and open competition architecture.

Sincerely,

Laura Hout Mayer

Laura Hout Mayer, March 22, 2001

III-1. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

III-2. The Santa Barbara Superior Court has determined that the previously prepared Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project except for potential impacts on public scenic views. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

Although the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500 foot long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing does not reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free flow roadway capacity changes from approximately 2,800 to 1,400 vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when lots of pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at LOS B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

III-3. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

III-4. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

III-5. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

This page intentionally left blank.

Andaloro, Debra
From: Allegra Heidelinde [allegra@rain.org]
Sent: Thursday, March 22, 2001 3:34 PM
To: dandaloro@ci.santa-barbara.ca.us
Subject: Entrada Project

Dear Debra Andaloro,

I am writing to let you know that I am vehemently opposed to the Entrada de Santa Barbara Project.

JJJ-1 It still boggles my mind that it has been allowed to get this far in the process when it would so clearly and so permanently destroy the very best and most special aspects of the waterfront. Santa Barbara is a special community to live in, I'm afraid projects such as the proposed Entrada aim to make it less of a community and more of a resort. Who wants to live in a resort?

JJJ-2 I enjoy walking, jogging and biking along the waterfront area, I visit the pier and admire the view of the ocean and the mountains. It is inconceivable to me that taking away the view, that permanently altering the charm, beauty and welcoming atmosphere is even being considered. Furthermore, everyone I ask is also opposed to this project. Perhaps you haven't heard many responses against this project, if you haven't, try walking up to the next person you don't know that you pass on the street and asking them. Or go down to the pier and ask people there what they think of blocking the stunning, unique and public views of our wonderful mountains? You already know what you will find—absolute opposition.

Thank you for reading this and recognizing that the people of Santa Barbara want you to protect and preserve the waterfront which we all cherish so dearly.

Sincerely,

Allegra Heidelinde
1817 De La Vina
Santa Barbara, CA 93101

Allegra Heidelinde, March 22, 2001

JJJ-1. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

JJJ-2. Please see response to comment JJJ-1.

COMMENTS CONCERNING THE CONSIDERATION
BY THE PLANNING COMMISSION
OF THE ENVIRONMENTAL IMPACT REPORT
FOR "LA ENTRADA DE SANTA BARBARA" PROJECT
AND THE CONCURRENT PUBLIC WORKS PROJECT
TO NARROW THE VEHICULAR TRAFFIC LANES
IN THE 100 TO 300 BLOCK OF STATE STREET
AND ALSO THE DISCRETIONARY CONSIDERATION
OF BOTH THESE PROJECTS FOR FUTURE ISSUANCE
OF A COASTAL DEVELOPMENT PERMIT AND THE
NECESSARY DETERMINATION OF WHETHER BOTH,
OR EITHER OF THESE PROJECTS, COMPLY WITH THE
CALIFORNIA COASTAL ACT, AND THE CERTIFIED LOCAL
COASTAL PLAN OF THE CITY OF SANTA BARBARA.

BY JAMES E. MARINO

RECEIVED

MAR 2 2 2001

CITY OF SANTA BARBARA
PLANNING DIVISION

HISTORICAL BACKGROUND

This project entitled, and commonly known as, the [La] Entrada De Santa Barbara [hereinafter simply La Entrada] was originally approved by the planning commission in May 1999. There were actually two (2) projects, one, La Entrada, a large time share condominium construction and conversion of the Existing California Hotel to time-share condominiums and including retail commercial shop space and, secondly, a public works project to narrow the existing four (4) traffic lanes in the 100-300 block of State Street down to two (2) lanes, one in either direction. This public works project was purportedly designed to provide wider sidewalks at the expense of vehicular traffic lanes instead of taking additional

KKK-1

width from interior private property lines and building setbacks and was ostensibly intended to create a visual appearance in this area like that found on the mid-town State Street "Plaza" in the 500 to 1200 blocks. That Planning Commission decision approving the project was arrived at after staff recommendation and public hearing by the Commission concluding that compliance with the California Environmental Quality Act [hereinafter simply CEQA] could be accomplished by use of a mitigated Negative Declaration rather than by requiring an Environmental Impact Report. At the same hearing the Planning Commission acting as the authority responsible for the issuance of a coastal Development Permit in accordance with the California Coastal Act and the Local Coastal Plan [LCP] of the City of Santa Barbara and Municipal Code section 28.45.009, authorized and

issued a Coastal Development Permit [CDP]. The project approval was appealed to the Santa Barbara City Council by several groups and persons, and on several different grounds. After a tumultuous public hearing before the City Council in July 1999, the Planning Commission Decision of Approval was ratified and the appeal from the Planning Commission by the Appellants was denied on all grounds.

Three groups opposing the project and who were Appellants to the Council then appealed the decision permitting and authorizing the issuance of a Coastal Development Permit to the California Coastal Commission pursuant to section 28.45.009 of the Santa Barbara Municipal Code based on violations of the State Coastal Act and the City's Local Coastal Plan. A preliminary finding of the Commission at a hearing in November 1999 indicated there were substantial issues involved in the appeal and ordered the appeal be set down for full public hearing. In particular, the Commission preliminarily determined that the California Hotel was historically a low cost visitor accommodation offering as many as 90 such units for overnight visitor service uses. The conversion of the California Hotel to time share condominiums violated provisions of the Coastal Act requiring preservation of low cost visitor accommodations.

KKK-1

In the interim two of the community groups, the Environmental Defense Center and the League of Women Voters, who had appealed to the Coastal Commission, violations of the Coastal Act and various LCP policy violations, also

filed a lawsuit in the Santa Barbara Superior Court pursuant to Public Resource Code section 21167 and 21167.4 [CEQA] challenging the adequacy of environmental review of the project under CEQA on several grounds and issues. At the conclusion of the hearing in that case the Santa Barbara Superior Court, the honorable Thomas Anderle, Judge presiding, concluded that several of the challenged environmental impact issues had been adequately addressed at least sufficiently to satisfy the requirements of CEQA, however one issue, the impact on views, had not been adequately addressed and a fair argument as to the inadequacy of analysis on view impacts was established by Plaintiffs requiring Respondents to prepare an Environmental Impact Report.

KKK-1

As a result of that court decision, the developer and the City of Santa Barbara were required to prepare an Environmental Impact report addressing those CEQA issues, [sometimes called a focused EIR].

As a further result of that a court decision, the Coastal Development Permit based upon the original faulty Environmental Assessment was rendered moot and rescinded as a matter of law. Accordingly, the appeal of issues involved in the issuance of a Coastal Development Permit pending before the Coastal Commission were rendered moot and the appeal was taken off calendar by the Coastal Commission.

A Draft Environmental Impact report has been prepared and completed in February 2001, and has been submitted for public comment. It also was set down

for preliminary hearing on its adequacy to address view and related impacts. That hearing was set for the date of 15 March 2001 and was held before the Santa Barbara City Planning Commission with numerous public comments received on the preliminary "focused" Environmental Impact Report.

KKK-1

II. ISSUES FOR REVIEW AND ANALYSIS

It is unclear from the notice sent out for the 15 March 2001 hearing whether or not the Planning Commission intends to consider any of the many matters which are specific to the California Coastal Act, and the City of Santa Barbara's Certified Local Coastal Plan for inclusion in the record for a later date when there is the required hearing to determine whether or not to issue a Coastal Development Permit for both these projects. The Draft Environmental Impact report submitted attempts to "focus" on the issue of impact on views affected by the project and is therefor devoid of any discussion on the many other Coastal Zone issues distinct from the CEQA issues. Accordingly, the discussion and numerous, very colorful photographic exhibits, in the attached appendices which were included in the EIR, focus almost entirely on views, and it attempts to visually create the hypothesized or superimposed impacts of the proposed structures on views if the project was built as designed. These "viewprints" are superimposed on certain selected view planes or corridors and purport to show various angles of the viewer from within the project and vicinity.

KKK-2

The applicant and the Draft Environmental assessment briefly mention "other significant .... Effects" describing them first as "unavoidable" and then in terse comments in the report dismisses further discussion of other issues with the comment that they have already been evaluated in the prior Mitigated Negative

KKK-3

KKK-3 Declaration adopted by the Santa Barbara City council in August 1999 and left untouched by the court in its CEQA decision on May 30, 2000.

It is this comment that is misleading and fails to address the proper status of the pending project assessment.

KKK-4 For purposes of CEQA the courts conclusion was that the general assessment of these other subjects, that is, non-view-related issues, were adequate, or sufficient for those Environmental Quality Assessment purposes alone. No issue of the level of analysis or compliance with the California Coastal Act or the city's certified Local Coastal Plan was raised or was before the court in the CEQA lawsuit or was otherwise decided in that case. In addition to those issues required to be assessed under CEQA, the discretionary project approval for both La Entrada and the public works project to eliminate traffic lanes on State Street, must include an independent assessment of whether the entire project and all of its components complies with the California Coastal Act, the LCP and ordinance 28.45.009 before any Coastal Development Permit can be issued for either of these projects.

KKK-5 This independent analysis is unique to Coastal zone developments. It is in addition to and supersedes other factors, some of which may conflict. See Santa Barbara Municipal Code section 28.45.009 section 5 [the Coastal Zoning Overlay Ordinance] indicating Coastal Zone planning issues take precedence over other and any conflicting policies.

KKK-6 Therefore, prior to issuing a Coastal Development Permit for this project, the Planning Commission must reach independent findings and conclusions concerning all the issues of the project's impacts to the coastal zone including matters that were inadequately assessed or for which erroneous conclusions were reached in the earlier previous issuance of the now vacated Coastal Development Permit. In some cases these were matters that, for unexplained reasons, were not assessed at all in the earlier hearing to issue a Coastal Development Permit such as the Entrada project's clear violation of policy 4.5 of the Certified Local Coastal Plan on Parcel "A". This patent unmitigated violation of policy 4.5 of the Certified Local Coastal Plan of the City of Santa Barbara was immediately recognized by the California Coastal Commission in its ruling in November 1999 when it found that substantial issues existed on appeal. As set out above, that appeal was rendered moot when the Superior Court ruled that view assessment under CEQA was inadequate in the Mitigated Negative Declaration and an EIR was required. [This ruling in turn vacated the coastal development permit based on that defective environmental assessment (Negative Declaration) as a matter of law.]

Accordingly, the assessment of all these other significant impediments to the issuance of a new coastal development permit must now be adequately assessed.

For this reason these comments are submitted well prior to the final hearing on the adequacy of the final focused draft Environmental Impact Report so that they are part of the record. Also if the Developer, or the City who had suggested to the Coastal Commission[1] certain mitigations to the low cost visitor accommodation issue on the developer's behalf, one of which was to convert some nearby building to an overnight lodging place providing low cost visitor accommodations, intend to do that then that aspect or proposed mitigation is of

KKK-7

such size and complexity as to require a new or amended environmental assessment of its own under CEQA. See Public Resources Code sections 21065, 21151, 21166 and Guidelines 15073.5, 15074.1, 15162, and 15178. In substance these sections provide that if significant changes are made to a project after submission and approval or in the process of mitigation a new or different project emerges or a substantial component added as a mitigation, then a new environmental assessment must be done.

KKK-8

The discussion that follows here, therefore addresses both the issue of the project's violation of policy 4.5 of the LCP and related sections, and its inadequacy to satisfy access, circulation, traffic and parking impacts required **in the Coastal**

[1] Attempts were made by City staff in the course of the Coastal Commission appeal process to suggest different ways that the projects violation of policy 4.5 of the L.C.P. and section 30213 of the California Coastal Act might be mitigated. No explanation was ever offered to explain why this important violation was not disclosed, adequately assessed and mitigated at or before the hearing at the City level before it was determined whether or not to issue the project a coastal development permit in the first place.

zone, and lastly the need for an additional environmental assessment if in fact another ancillary "project" is proposed as a mitigation to La Entrada's violation of

KKK-8

sections 30222 and 30213 of the California Coastal Act and policy 4.5 of the certified LCP by eliminating low cost visitor accommodations without adequate replacement or mitigation.

In addition the Draft EIR focuses on discussion of views, apparently as a result of the CEQA court action, but fails to adequately address views in the context of the State Coastal Act and the Local Coastal Plan which are more stringent than those generally applicable to a CEQA analysis due to the unique nature of the coastal zone and this particular area of the central waterfront in Santa Barbara. In particular the concept of openness as well as character preservation as a function of views.

KKK-9

Section 30251 of the Public Resources Code and the discussion on pages 128 through 144 of the City's Certified Local Coastal Plan make it clear that views in and from the coastal zone are of paramount and unique importance, particularly in the central waterfront area as distinguished from general C.E.Q.A. considerations or other waterfront areas where few persons would be expected to be there taking advantage of the majestic panoramas.

In particular, policies 9.1 through 9.5 make it clear that the proposed "La Entrada" project creates impermissible view obstructions from critical areas of the coastline and is too massive or bulky to comply with many other Local Coastal

Policies which stress both the importance of preserving the **unique and open character of this area** and mandate the preservation of openness and mandate the requirement to maintain scenic vistas of Santa Barbara and the coastal plane from throughout the area.

As set out above, this is particularly true for the central waterfront, roughly the boat harbor to Chase Palm Park because it is the area that attracts the largest KKK-9 volume of pedestrians who enjoy the unfettered views of the mountains, the sky, the city and coast, while strolling or recreating in this area. See the numerous references to preserving the character of this part of the central waterfront and maintaining views and visual quality discussed throughout the LCP but of particular note in the section entitled Land Use, which segment can be found on pages 172 to 193 of the LCP and also the Visual Quality Segment pages 128 to 150 of the LCP.

III. DISCUSSION

A. THE PUBLIC WORKS PROJECT REQUIRING A COASTAL DEVELOPMENT PERMIT [CDP] TO NARROW STATE STREET CONCURRENTLY WITH THE LA ENTRADA PROJECT IS NOT CONSISTENT WITH THE CALIFORNIA STATE COASTAL ACT OR THE CERTIFIED LOCAL COASTAL PLAN [LCP] OF THE CITY OF SANTA BARBARA.

The Coastal Act and the LCP of the City of Santa Barbara both require the KKK-10 protection of existing access to the coastal zone and particularly the central waterfront areas which are dominated by extensive and heavy visitor-oriented and recreational uses.[2] The central waterfront area runs from approximately Chase Palm Park to the boat harbor. Because of the freeway and the railroad tracks, this area has historically been increasingly more difficult to access, particularly since completion of the cross-town freeway project in 1991. Access has now been diminished by both the cross-town freeway and the railroad tracks.

In the central waterfront areas there are now only three (3) streets that provide somewhat convenient access to this area from above the freeway and

[2]This is recognized as the area where large numbers of pedestrians are sightseeing as well as large numbers of vehicles are both sightseeing and accessing the many nearby recreational and visitor serving uses, including Stearns Wharf. For these purposes, it is the most intense and in need of the largest vehicular access available.

railroad tracks. One is Castillo Street which is only a two-lane street. Garden, which is four lanes below the freeway but which winds through unattractive commercial industrial areas and through a highly congested signal-controlled intersection with Gutierrez Street, and lastly State Street. State Street is currently four (4) lanes from Gutierrez Street to Cabrillo Boulevard, two (2) lanes in either direction. It is the most popular and the primary and most convenient, direct and centrally located access to the central waterfront area and to Stearns Wharf which begins at the foot of State Street.

State Street was designated as part of the transportation corridor. See component 4. LCP page 177, a general discussion of transportation, circulation and parking issues in the waterfront area.

KKK-10

"The Waterfront Area

The City contracted in 1978-79 with the De Leuw, Cather and Company to prepare the "Waterfront Area Transportation Study" (WATS), a comprehensive study of parking and circulation in the waterfront area. The following discussion of findings and impacts is extracted from the "Summary" chapter of the report. Detailed information on all of the issues discussed can be found in the Final Report.

Findings

Traffic Volumes

Traffic volumes are highest in the study area during the July and August summer months due to recreational travel. Traffic volumes build up during the week and peak on Sundays. Peak hour periods occur during the afternoon during weekdays and Sundays. Most of the traffic and parking analysis in this study examined peak summer Sunday and weekday conditions.

Traffic Capacity

Presently during summer weekdays and weekends, most streets and intersections in the study area operate at a level that provides good or even excellent traffic operation, and traffic delays are minor. The exception are the four U.S. 101 signalized intersections with Chapala Street, State Street, Anacapa Street and Santa Barbara Street which, during peak periods, experience poor operation on weekdays and fair to poor operation during Sundays. The congestion at these intersections is due to the high traffic volumes on the freeway, and the limited number of traffic lanes. (Note: In 1991, the Crosstown Freeway project was completed. This project removed all four signalized intersections on Highway 101.)

KKK-10

Parking

There are over 5,300 public parking spaces in the study area, nearly evenly divided between curb and off-street spaces.

On Sundays, the number of vehicles parked in the beach area builds up over the day and peaks at 2:00 PM at which time 75 percent of the 4,200 parking spaces closest to the beach are occupied. At that time, most of the parking lots and on-street spaces adjacent to Cabrillo Boulevard are at or above their practical parking capacities. Closest available parking is generally located two blocks or more north of the beach area. The number of vehicles that occupy a single parking space during the day (turnover) averaged 2.7 which is much lower than the turnover rate exhibited in downtown lots, and indicates a predominance of long-term parkers.

Weekday parkers exhibited much different characteristics than the Sunday parkers. The peak parking occupancy occurred in the morning (10:00 AM) at which time about 60 percent of the spaces surveyed were occupied. The number of on-street parkers remains constant over the day at about 40 percent of the available supply. The amount of parking taking place in off-street lots, however, decreases over the day due to a drop off in demand for student parking near the Santa Barbara City College. Weekday parking utilization and turnover are significantly lower than those observed for Sunday.

Public Transit Service

Public transit does not provide comprehensive coverage of the study area, and for most riders at least one transfer is involved in reaching the area. Less than 1% of the total travel in the study area now occurs on the three public transit lines in the waterfront area. These lines are relatively well

utilized compared to the rest of the MTD transit system but do not provide direct access between all major local destinations.

Policy 10. of the Local Coastal Plan provides: The Harbor/Wharf complex shall be restructured to: ... **(3) provide adequate circulation for all modes of transportation within the waterfront.**

Page 192 of the Local Coastal Plan, sections(1) and (2) provide as follows:

(1) Openness
Minimizing visual impacts of building density, scale, mass, and height.

Protecting access to the Waterfront area in general by balancing the distribution of coastal resources and urban facilities at levels which maintain the existing degree of openness.

KKK-10

(2) Lack of Congestion
Protecting and maintaining the status of Cabrillo Boulevard as a scenic drive and grand boulevard by (1) controlling adjacent land uses so that they neither directly or indirectly exit on Cabrillo Boulevard so as to cause a need for additional traffic signals; and (2) focusing pedestrian activity, and facilities generating pedestrians, south of the Boulevard, to avoid the need for pedestrian crossings in the stretch of Cabrillo along Palm Park.

Protecting the uncongested quality of the waterfront by locating additional parking facilities to handle peak loads north rather than south of Cabrillo, with provision of shuttle bus service along the waterfront.

See also sections 30210, 30211 and 30212 of the Public Resources Code, all of which mandate preserving and increasing public access to the ocean and waterfront areas **[by all modes of transportation]** including sight-seeing by automobile and accessing the many visitor service uses there.

Clearly, any further limitation on access to this area by motor vehicles, or by service and commercial vehicles, including emergency vehicles, public transport, bicycles, pedal cycles, or even pedestrians, is both a violation of the Local Coastal Plan mandate to preserve open circulation and implement congestion prevention requirements and also violates the hazard prevention provisions of the LCP, and also section 30253 of the State Coastal Act. The proposed narrowing of State Street by the artificial bottleneck below the freeway in the 300 to 100 blocks is a **congestion creation proposal**.

KKK-10

Moreover, as set out above, it is dangerous and inconsistent with the safety and open circulation requirements discussed in all of these sections. To further narrow the most important and popular vehicular, bicycle and pedestrian access to the central waterfront area, creating greater congestion in busy times and as set out above hampering access by emergency vehicles, or escape from the area in case of disaster is wholly inconsistent with the State Coastal Act and LCP. [See attached photo EXHIBIT 1] which is an example of just how highly congested holiday summer traffic can be in that area now, and which has occurred even with the existing and necessary four (4) lanes [two (2) traffic lanes for vehicle traffic in each direction]. As depicted in the attached photo [EXHIBIT 1] and particularly when train traffic interrupts North-South motor vehicle traffic on State Street congestion can render the street at least temporarily impassable. This is because there are few lateral egress routes to relieve congestion and those to the west

would force vehicular traffic to turn onto Mason Street into a quiet residential area with narrow maze-like streets recognized by the LCP as a unique residential

KKK-10 neighborhood to be protected and preserved from such increased traffic, and those few streets available to the east are also narrow and congested and were never designed for such increased traffic.

B. THE PORTION OF THE PROJECT INVOLVING CONVERSION OF THE EXISTING CALIFORNIA HOTEL [PARCEL "A"] IS A CLEAR VIOLATION OF SECTION 30222 and 30213 OF THE CALIFORNIA COASTAL ACT AND IN PARTICULAR, POLICY 4.5 OF THE LOCAL COASTAL PLAN OF THE CITY OF SANTA BARBARA.

See the Discussion of the re-development plan on page 177 of the LCP, describing the proper future development of the area of the "La Entrada" Project. Also on page 178 of the Certified Local Coastal Plan of the City of Santa Barbara, the Plan's Land Use provision provides the following:

KKK-11

> "In conformance with the Redevelopment Plan, the areas generally fronting along Cabrillo Boulevard from Chapala Street to Santa Barbara Streets, and State Street from Cabrillo Boulevard to the Freeway shall be classified as "Hotel and Related Commerce II" and zoned for general visitor-serving uses (see "Visitor-Serving uses" policy discussion).

The area of this "La Entrada" project, the first 100 through 300 blocks of State Street, is therefor in the area designated as "Hotel and related Commerce II."

The discussion of the HRC II uses can be found in the Local Coastal Plan on pages 59 to 69.

"4. LCP Land Use

In conformance with the Redevelopment Plan, the areas generally fronting along Cabrillo Boulevard from Chapala Street to Santa Barbara Street, and State Street from Cabrillo Boulevard to the Freeway, shall be classified as

"Hotel and Related Commerce II" and zoned for general visitor-serving uses (see "Visitor-Serving Uses" policy discussion).

Consistent with the Coastal Act Policies regarding public access and public services, the provision of a railroad depot/transit center has been planned for many years for the area just south of U.S. 101 and west of State Street. While decisions regarding the plans for a transit center in the waterfront have not been adopted by the City, this concept would be consistent with the land uses proposed for either Components 4 or 5."

"Size, Scale and Impact on Public Service

While the Coastal Act seeks to encourage visitor-serving uses, it is also important to ensure that such uses do not result in a congested and visually disorienting environment. To maintain the City's attractive image, the General Plan states that "emphasis shall be placed on the preservation and protection of scenic areas and improvement in the quality of historic, recreational and other tourist and visitor attractions ... rather than on intensive campaigns to increase the quantity of tourist activity."

KKK-11

"Preserving Lower Cost Visitor-Serving Uses

Section 30213 of the Act calls for the protection and encouragement of lower cost visitor-serving uses. Santa Barbara is fortunate in that a diversity of visitor-serving experiences are available to visitors at no cost (free!) such as, public beach and park areas, the Arts and Crafts Show, channel and boat viewing at the Harbor, bird watching at the Bird Refuge, and meandering through small shops and art galleries along Cabrillo Boulevard an State Street. These uses are an integral part of Santa Barbara's shoreline experience which should be preserved to meet both the intent of the Coastal Act and to provide both visitor and resident recreational opportunities. These uses can be preserved, in part, by: (1) obtaining public dedications and supportive zoning for existing public open spaces; (2) ensuring that new commercial development is visitor-serving in nature; and (3) establishing policies which accommodate an preserve unique opportunities, such as the Art Show and boat viewing in the Harbor.

In addition to visitor-serving recreational uses, preservation of lower cost lodging and restaurants is important. Preservation of lower cost uses can be achieved, in part, by: (1) ensuring that an adequate supply of lodging and restaurant opportunities is available so that demand does not result in exclusive prices; and (2) maintaining and encouraging a range of price and

type of lodging units available. Ensuring an adequate supply of overnight lodging and restaurants will require control of conversions of visitor-serving uses to other uses, and encouragement of new visitor serving uses in appropriate areas as demand increases. Similarly, for development of new overnight accommodations, a possible condition of development should require a range of accommodations so that moderate and lower priced lodging continues to be available in Santa Barbara's coastal zone.

PROPOSED LCP POLICIES

Based on the above issue discussion, three major policy areas which the LCP must address have been identified:

(1) Policies and actions which bring existing plans and policies into conformance with the Coastal Act **by protecting and encouraging visitor-serving uses as a priority coastal use**;

KKK-11

(2) **Policies which ensure that new visitor-serving development is compatible in size and scale and does not result in adverse impacts on environmental features** or public services; and

(3) **Policies which serve to protect and encourage the provision of lower cost visitor-serving uses**.

Policy 4.1[20]

In order to preserve and encourage visitor-serving commercial areas, appropriate areas along Cabrillo Boulevard, Castillo Street, Garden Street and along State Street shall be designated "Hotel and Related Commerce I (HRC-I)" and "Hotel and Related Commerce II (HRC-II)".

HRC-I designation shall include hotels, motels, other appropriate forms of visitor-serving overnight accommodations and ancillary commercial uses directly related to the operation of the hotel/motel.

HRC-II designation shall include all uses allowed in HRC-I and such other visitor-serving uses examples such as, but not limited to, restaurants, cafes, art galleries, and commercial recreation establishments. Uses such as car rentals and gas stations will require a conditional use permit."

To facilitate these objectives and designations the certified Local Coastal Plan provides the following:

"4.3 Public amenities which provide unique lower cost visitor-serving experiences, such as the Arts and Crafts Show, channel and boat viewing at the Harbor, and any other special uses shall be protected and encouraged."

"4.4 New hotel/motel development within the coastal zone shall, where feasible, provide a range of rooms and room prices in order to serve all income ranges. Likewise, lower cost restaurants, or restaurants which provide a wide range of prices, are encouraged."

- "4.5 **Removal or conversion of existing lower cost visitor-serving uses in areas designated HRC-I, HRC-II and Hotel/Residential shall be prohibited unless the use will be replaced by a facility offering comparable visitor-serving opportunities.**

KKK-11

This latter mandatory policy, 4.5, was never adequately addressed, reconciled or mitigated in any way in the earlier discussion surrounding the issuance of the now vacated Coastal Development Permit for this project issued in 1999. Although the Planning Commission made general conclusions that the project complied with the State Coastal Act and the Local Coastal Plan, such general assertions are not adequate and in this case, were not true. See Title 28.45.009(6) of the Santa Barbara Municipal Code, in particular sections 6. subsections h. & **i. and i (1)**.

Policy 4.5 in the LCP is therefore a policy which must be reconciled and mitigated because the La Entrada project as proposed will eliminate a substantial number of low cost visitor accommodations at the California Hotel site ["A"] without replacing any [82 or more units].

The policy and practice of the City of Santa Barbara when confronted with review of any project part of which lies within the appealable portion of the Coastal Zone and part outside of that appealable zone is to conduct a Coastal Development Analysis for the entire project as if all of it was within the appealable portion of the Coastal Zone. See the attached EXHIBIT 2.

KKK-11

As discussed earlier, prior to the vacation of the existing Coastal Development permit when the La Entrada project was appealed to the California Coastal Commission the project's violation of sections 30222 and 30213 and LCP policy 4.5 was recognized by the Commission. As set out earlier, no adequate assessment, or discussion of this issue had occurred and no mitigation therefor had been previously proposed. During the appeal the City, apparently speaking for the developer, suggested that to mitigate this clear violation the City could acquire the nearby Neal Hotel and convert it to a low-cost visitor accommodation. The City's representative, Development Director Dave Davis, went so far as to tell the Commission that negotiations for acquisition of this property were already under way with the owners. Mr. Davis also suggested as a possible alternative, a payment of cash could be made by the developer to the Coastal Commission as a

mitigation and mentioned the sum of approximately $1,000,000. One of the commissioners responded that $1,000,000 would barely pay for two tract homes in Santa Barbara, let alone replace the 80 to 90 or so low-cost overnight accommodations previously provided by the California Hotel. Some members of the Commission then did some quick arithmetic and using another time-share project the Commission had considered in a Northern California coastal zone, concluded that two-week time-share units on a scenic exclusive coastal area like Santa Barbara, particularly less than a block or two from the beachfront, would sell for at least $25,000 to $30,000 for two week units. This translates to about $600,000 to $800,000 per time share unit per year, which multiplied times the 162 units proposed in this project [including lock-outs], would be gross sales prices well over One Hundred Twenty Million Dollars ($120,000,000.00). Several Commission members openly speculated that a token payment of one million dollars ($1,000,000) as a mitigation fee would obviously be woefully inadequate to offset the loss of perhaps as many as 80 to 90 low-cost overnight visitor accommodations.

KKK-11

As discussed earlier, the belated attempts by the City to discuss possible mitigations of these deficiencies before the Coastal Commission was rendered moot by the Superior Court's ruling on the CEQA action. No further resolution of these issues has been discussed or has occurred to this date.

Obviously an important issue like this should have been divulged, discussed and adequately mitigated before the City Planning Commission or at least the City Council at its earlier approval of a coastal development permit for this project and should not have arisen as a last ditch effort to correct the project's violation well after the fact, that is after a Coastal Development Permit had been issued and the project was on appeal before the Coastal Commission.

KKK-11

IV. CONCLUSION

A. The public works project proposed for the narrowing of State Street in connection with the La Entrada project is violative of the traffic circulation and access requirements of the State Coastal Act and also the policies and provisions of the Local Coastal Plan [LCP] of the City of Santa Barbara including access, ingress and emergency evacuation or safety access for any catastrophe, or for emergency vehicle response. Also access in the LCP means access **for all modes of transportation including private motor vehicles**, commercial and service vehicles, public transit, and for all residents of the community, as well as visitors, tourists, and others who seek to access the waterfront area of the coastal zone for

KKK-12

sight-seeing, visitor and recreational uses.

Although no need was ever demonstrated that there was any reason or need to increase the width of the sidewalks in the project area for use of pedestrian access, that need, if it existed, could be addressed without narrowing traffic lanes. City staff publically offered as its sole reason to widen sidewalks at the expense of needed traffic lanes, the desire to make State Street within the development area "look like" midtown State Street or what some have called a plaza or "pedestrian friendly" configuration. No reason was ever offered why, if staff wanted to widen the sidewalks to include more park-plaza amenities, they did not simply move, or require as a condition of the permit, the moving of building setbacks back from the existing sidewalk, instead of eliminating the much needed and irreplaceable traffic

lanes. State Street is not only the primary access to the central waterfront area of the coastal zone, it is the most popular with residents and tourists alike. It is now two lanes in either direction below Gutierrez through the 101 undercrossing. The proposal to narrow the roadway back down from four (4) to two (2) lanes through the project is nothing more than the unnecessary intentional creation of a dangerous and inconvenient bottleneck on this important coastal and waterfront access route. If configured in that fashion, State Street would then expand from two to four lanes below Gutierrez Street and under the freeway, only to narrow back into two lanes, guaranteeing congestion and impairment to coastal access and

KKK-12

heavy congestion during the busiest and most popular times.[3]

The discretionary coastal development permit for the "La Entrada" project, pursuant to and required by section 28.45.009 of the Municipal Code, in its present proposed form should therefore be denied as violative of the access anti-congestion and circulation requirements of the State Coastal Act and the City's certified LCP.

B. The previous discussion and planning commission minutes from the earlier hearing at which the [now vacated] Coastal Development Permit was issued reflect that the Commission made broad conclusionary statements that the

[3] Congestion would then drive traffic off of State Street into adjacent neighborhoods on the three lateral egresses that are available. Two existing to the narrow streets to the East and only one to the West and into a maze-like narrow street grid disrupting and disturbing a quiet and unique residential area.

development complied with the Coastal Act and the Local Coastal Plan of the City of Santa Barbara. These broad conclusionary statements did not fulfill the specific requirements of section 28.45.009 (6) h. and in particular subsection i (1) requiring specific factual findings. As set out herein, the removal of low cost overnight visitor accommodations at Parcel "A" in this HC II zone, is prohibited by policy 4.5 of the LCP unless equivalent units in number and convenient location are simultaneously created. See also for example the related Policy 5.7 in the Local Coastal Plan dealing with low cost housing and apartment conversion to condominiums. It also violates sections 30222 and particularly 30213 of the California Coastal Act.

KKK-12

The project as presently proposed does not provide for <u>any</u> replacement of low cost visitor accommodations, nor has it ever been proposed for this project, other than in colloquy between the Coastal Commission and the City's representative Dave Davis, discussed below. This deficiency, that is the violation of policy 4.5, and section 30222 and 30213 of the California Coastal Act [Public Resource Code] was immediately identified by the Coastal Commission on appeal.[4] City Planning Director David Davis addressed the Coastal Commission at two hearings held on the appeal before the Coastal Development Permit became moot [when the Superior Court vacated the Negative Declaration upon which that

[4] The prior notices to the California Coastal Commission required to be sent in advance by section 28.45.009(6)(e) was never accomplished prior to the earlier coastal development permit hearing approval.

Coastal Development permit had been based]. At those two appeal hearings, Mr. Davis suggested mitigation could be accomplished by either payment of a million dollar mitigation fee and/or the conversion of the Neal Hotel building from its present restaurant/office use[5] to low cost visitor accommodations.

The problem with that proposed mitigation was three-fold.

One, a monetary mitigation sufficient to offset the loss of needed low cost overnight visitor accommodations in this critical visitor-serving area of the coastal zone would be prohibitive and on the order of at least fifteen million dollars ($15,000,000.00).[6]

KKK-12

Two, the conversion of the Neal Hotel as a purported "mitigation" would constitute an additional project or a new project under CEQA or would result in a project so significantly different than the one approved, that in any case it would be in need of a further environmental impact report of its own including public hearings, as set out <u>supra</u>.

[5] The building is only partially used now because of inadequate parking.

[6] The Santa Barbara City Development Director and the Developer suggested an open-ended, uncommitted mitigation fee of about a million dollars which could be deposited with the Commission. This sum would be woefully inadequate to provide any offset for the loss of low cost visitor accommodations caused by this project. As one member of the Coastal Commission pointed out in colloquy with Director Davis, given the cost of property in Santa Barbara, even away from the coastal zone, one million dollars ($1,000,000.00) would barely pay for two houses. Moreover, above the cost to acquire the Neal Hotel, the conversion cost to convert that hotel into only 40 low cost units, including code upgrades to fire alarm, fire escape and sprinkler systems, and elevators to make them currently lawful under existing building and safety codes would cost between five million ($5,000,000.00) and ten million dollars ($10,000,000.00).

Three, if either of these two mitigations, discussed before the Coastal Commission on appeal, or some combination of them, was in fact to be a part of this project, then those proposed mitigations would have to be part of the current review and part of the environmental assessment of the project itself at the City level, and should be subject to further public notice, analysis, comment and hearing as to the impacts of the mitigations proposed and their environmental adequacy or it would result in the impermissable practice known as "piecemealing."

KKK-12

Therefore, before issuing or re-issuing any Coastal development permit for this project, the Planning Commission must make specific findings and/or adopt specific mitigations to comply with the mandatory prohibition of policy 4.5 of the certified Local Coastal Plan and sections 30222, 30250(c) and particularly 30213 of the California Coastal Act as well as the unique open space anti-congestion requirements **for coastal access to this area of the coastal zone for all modes of transportation**.

Respectfully submitted,

James E. Marino

James E. Marino

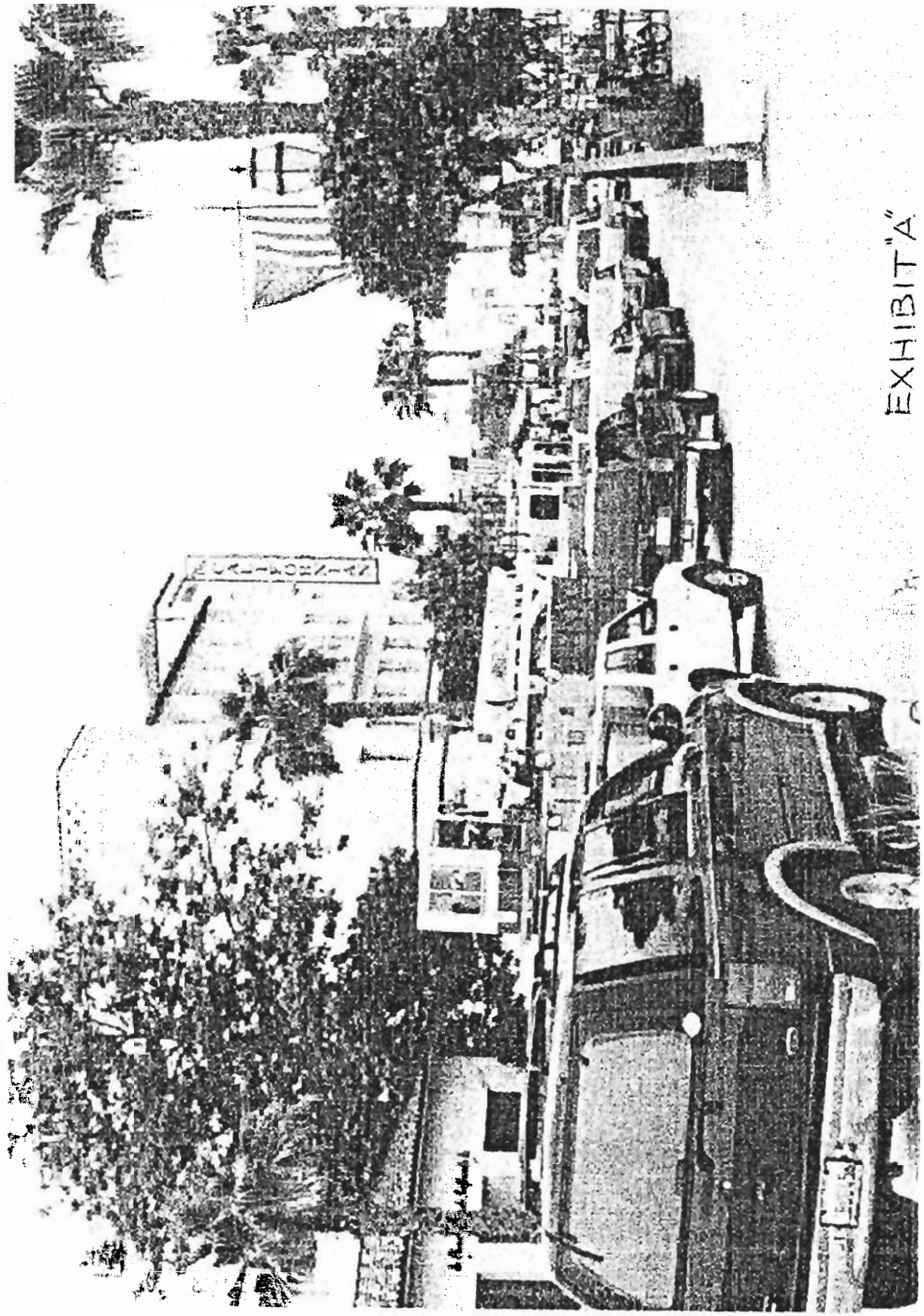


EXHIBIT "A"

City of Santa Barbara
California

CITY OF SANTA BARBARA

PLANNING COMMISSION STAFF REPORT

October 9, 1997

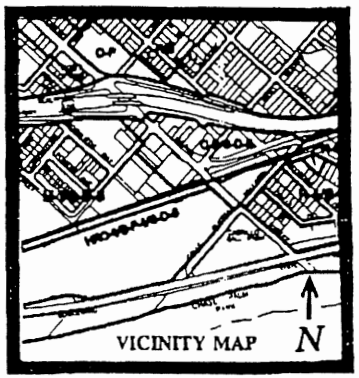
APPLICANT: Greg Knudson, Project Civil Engineer

PROPERTY OWNER: City of Santa Barbara

LOCATION: Intersection of Milpas Street and U.S. Highway 101

PARCEL NO.: 17-171-RW

REQUEST: The project involves improvements at the intersection of Milpas Street and U.S. Highway 101. These improvements would include: (1) removal of the traffic signal at the Milpas Street/Highway 101 Northbound ramps/Carpinteria Street intersection and reconfiguration of the intersection into a roundabout; (2) installation of a traffic signal at the intersection of Milpas and Quinientos Streets; (3) reconfiguration of the Milpas Street/U.S. Highway 101 southbound ramps/Indio Muerto Street intersection and (4) widening Milpas Street to two lanes in each direction between Indio Muerto Street and the Highway 101 overpass. The discretionary application required for this project is a Coastal Development Permit to allow construction of major public works project in the appealable jurisdiction of the Coastal Zone (SBMC §28.45.009). (MST97-0037) (CDP97-0039)



DATE APPLICATION ACCEPTED: August 14, 1997
DATE ACTION REQUIRED: October 13, 1997

EXHIBIT "B"

potential impacts and which required mitigation were hazardous waste, cultural resources, visual quality and construction impacts. All identified impacts were shown to be mitigated to a less than significant level

During public comment on the Draft Negative Declaration eight comment letters from the public and agencies were received by Caltrans, including comments from the City Fire Department and the City Planning Division. Responses to these comments are incorporated into the Final Negative Declaration (Exhibit D, Appendix B). On May 7, 1996, Caltrans approved the Final Negative Declaration.

The Negative Declaration identified no significant and unavoidable impacts related to the proposed project. Pursuant to CEQA and prior to approving the project, the Planning Commission must consider the Negative Declaration and any comments received.

For each mitigation measure adopted as a part of a Mitigated Negative Declaration, the decision-makers are required to make the mitigation measures conditions of project approval and adopt a program for monitoring and reporting on the mitigation measures to ensure their compliance during project implementation (PRC §21081.6). The mitigation measures described in the Final Negative Declaration have been incorporated into the recommended conditions of project approval (Exhibit A) for this project. In addition, a mitigation monitoring and reporting program (MMRP) was developed by Caltrans and is included in the project's Final Negative Declaration.

V. ISSUES

Only the portion of the project area south of Highway 101 is located within the Coastal Zone; however it is City practice to review projects which are partially in the Coastal Zone as a whole. The project is in the appealable jurisdiction of the Coastal Zone because it constitutes a major public works project (SBMC §28.45.009(c.)(3.). To approve the Coastal Development Permit, the Planning Commission must find that the project is consistent with the policies of the California Coastal Act, the City Local Coastal Program, its implementing guidelines and all applicable provisions of the Municipal Code.

Coastal Act Consistency:

One policy of the California Coastal Act appears relevant to the proposed project. Section 30254 states (in part):

"New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division. . ."

EXHIBIT "B"

James E. Marino, March 22, 2001

KKK-1. The comment presented does not address the adequacy of the EIR analysis. Please see section 2.4 for project background.

KKK-2. The purpose of the March 15, 2001, public environmental hearing at the Planning Commission was to take comments on the Entrada Project DEIR. Other comments will be forwarded to the decisionmakers for consideration at a later hearing on the project.

KKK-3. The Santa Barbara Superior Court has determined that the previously prepared Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project except for potential impacts on public scenic views. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

KKK-4. The analysis of the proposed project's consistency with the California Coastal Act, and applicable City plans, policies, and ordinances is contained in the staff report associated with the previous City approval and the report prepared by the staff of the Coastal Commission for the previous appeal of the project. Prior to any future hearing on the Entrada project's land use and design merits, a new staff report will be prepared which will reexamine the Entrada project's consistency with all applicable plans, policies, and ordinances and will be considered again before the City decisionmakers.

KKK-5. Please see response to comment KKK-4.

KKK-6. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

KKK-7. Please see response to comment KKK-6.

KKK-8. Please see response to comment KKK-6.

KKK-9. CEQA Section 15125(d) requires that the EIR "discuss any inconsistencies between the proposed project and applicable general plans and regional plans..." The section states that, "where individual projects would run counter to the efforts identified as desirable or approved by agencies in the regional plans, the Lead Agency should address the inconsistency between the project plans and the regional plans. As a result of this analysis, Lead Agencies (such as the City) may be able to find ways to modify the project to reduce the inconsistency." The analysis of project consistency with applicable

State and City plans and policies contained in the Revised Second Mitigated Negative Declaration adopted by the City Planning Commission and upheld on appeal by the City Council was found to be legally adequate and approved by the Santa Barbara Superior Court. Due to these unique circumstances, this EIR goes beyond the usual initial staff assessment of potential consistency or inconsistency and reports the actual policy consistency for this project previously made by the City regarding plans and policies related to public scenic views. There is nothing in the EIR analysis that changes this earlier assessment. However, as noted in the introduction to Chapter 3.0, Introduction of this EIR, "These decisionmakers will review this project again and are free to re-evaluate this consistency determination." It is the role of elected and appointed decisionmakers to interpret and apply adopted state and City plans and policy language. The fact that the commentor differs with City staff, Historic Landmarks Commission, PC and CC on interpretation and application of state and City plans and policies in this matter is acknowledged and will be forwarded for decision-maker consideration.

KKK-10. It is important to note that the proposed narrowing of lower State Street is a component of the Entrada project; it is not a City Public Works project, but part of the applicant's project description. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project. Please also see response to comment KKK-3.

Although the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500 foot long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing does not reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free flow roadway capacity changes from approximately 2,800 to 1,400 vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when lots of pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at LOS B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

KKK-11. The comments presented do not address the adequacy of the EIR analysis. Relative to the loss of lower-cost visitor serving over-night accommodations, this is not an issue that is required to be assessed under CEQA nor is it required to be assessed pursuant to the City's Environmental Guidelines for the Implementation of CEQA or the City's Master Environmental Assessment.

However, during the review of the Entrada project on its merits, the Entrada project will be reviewed for consistency with the Local Coastal Plan policies which relate to lower-cost visitor serving accommodations. The California Coastal Commission has indicated that for the Entrada project to be consistent with the City's Local Coastal Plan, the conditions of project approval should include a condition requiring compensation for the loss of lower-cost visitor serving accommodations that the California Hotel once provided.

The comments will be forwarded to the decisionmakers for consideration during their review of the project.

KKK-12. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project. Please also see response to comment KKK-3, KKK-10, and KKK-11.

This page intentionally left blank.

3-19-01

City of Santa Barbara
Planning Division
630 Garden St.
Santa Barbara, CA. 93101

Re: Views adversely impacted by Entrada de Santa Barbara

Dear Planning Commissioners,

This is the passionate Mrs. Mori again, addressing Entrada de Santa Barbara. I took the time to watch the public hearing of the 15th, one late night. Firstly, I would like to apologize for any offending remarks I may have made in my first letter to you (i.e. tar and feathering and the dreaded "not truly a Santa Barbaran"). I was reminded of each of you, as I watched, and of the public service you have given to our community, and felt a tad embarrassed I'd dealt out such strong terms. I apologize, but not necessarily for my passion.

LLL-1 I was glad to see more of the pictures, not only during that meeting, but more so in the News-Press the next day. Indeed as many stated, they are a valuable tool. It did allow me to visualize not only the impact on views but the overall impact and sense of the project and place it there more readily in my mind's eye. It also showed the value of the architecture, which does seem to be more integrated into the project, then facades placed on boxes.

While the meeting itself was obviously attended by many of Mr. Levy's friends, I was pleased to hear that you apparently had your own concerns based on continuing values of the Waterfront's sense of place and scale introduced there. I agreed with your concerns on many of the same photos.

LLL-2 I wanted to address these points many of you , yourselves brought up, that I felt were right on target. While my first passion was to protect the mountain vista's or what's left of it there, I completely agree that the "sense" of the waterfront/beachside quality be preserved. As one Commissioner kindly held view to, it is the SKY that is an intregal part of that sense. I'd mentioned that once you come up from under 101, how important a more relaxed, less downtown, element should overtake you, as it does now. Again it seems to be the mass of three-story elements that I feel would fill in that sense, and seem will continue an extension of urban life as in the downtown corridor. It will adversely or negatively impact, the Ocean Breeze enhanced by palm trees, that Ocean Sky filled with seagulls and Ocean Swept Clouds and even the fog billowing in. Strangely it is simply that openness, that takes you over, that beautiful BROAD, OPEN California Technicolor, Brilliant, SUNNY BEACHSIDE. These are all the elements Mr. Levy wishes to perch his project in, and take advantage of, FOR HIMSELF and investors.

LLL-3 As a resident, I pass under that bridge and I've immediately left, the bank, my shopping trips for goods and gifts, my business drop-offs and pickups, and I'm on a mini-vacation myself. I was delighted to hear that the kayak rental business was planning on staying, you immediately go into a S.B. kick-back mode, at a glance of its now, unimposing, shop fronts. My concern is some of the larger buildings seem to create the same feeling as downtown. Appears that it will be thick with sidewalk cafes and a mass of building, creating lots of hustle and bustle, not the open ambiance that transcends you to the SENSE OF THE OCEAN.

LLL-4 My overall concerns are not only Mr. Levy's group project, but that if three stories are accepted there, that many of the areas blighted and ready for improvement properties down there, would expect to be allowed to do the same. Bit , by bit, the openness and mountain views will be peppered with buildings, just like anywhere else in California, and therefore we will lose our Sublime Uniqueness.

LLL-5 There was a lot of talk about replacing the eyesores that exist now, as there was the same talk about Parker's place. This argument always amuses me, these eyesores are what the property owners have allowed to happen to their properties, and caused us as the community to have to accept for a very long time. Most good citizens (that they so purport to be) keep their properties in decent condition, maintained, and free of eyesores and degradation. However, this does not seem to fit as well into their development ideas, as leaving it a mess. So many folks always point this out, "We'll get rid of the blight that is there". It is Mr. Levy's and Mr. Parker's blight!! Don't they see the trick? Also, of course it will be built beautifully, like anything else would have a pray. Eventually I think the Levy group will build something nice, and like

LLL-5 all things built in S.B. it will have gone through the most rigorous of standards. One look at our town, and I for one am thankful, even though I also have personally felt the hand of the ABR, (ouch!!).

Fortunately, as I mentioned earlier, it does seem like this is more thoughtfully designed, than other properties I'm familiar with Levy doing. Paseo Nuevo, looked like a Hollywood set, of what Hollywood folks, thought Santa Barbara would look like. Thank heavens for the foliage, its helped to soften it

LLL-6 tremendously. Then there is this new Ralph's COMPLEX, isn't he involved there? Anyhow its mass and blockiness is something I thought would never be built here. They are both reasons I write to voice my opinion, over concern for his sense of development. I realize you are the ones hearing all sides, and are the best to judge.

Please however, do not be swayed by opinion's that due to Mr. Levy's level of charitable giving, he should have privilege afforded him. I find this line of discussion most offending. The two should be completely separate. While its fine to recognize him as a generous citizen, **it is abhorrent to think he gave, in order to get.** Maybe, I'm naive, and that is how things work, but forgive me for taking the high

LLL-7 ground, one is to give, the other is business, they should not be conjoined. Mr. Levy is a very fortunate man, by all standards, enjoying a life where he can freely give to others in need and contribute to his community. He is also most fortunate in an entirely other aspect, he owns some of the world's most desirable property. This property has enjoyed unbelievable increased value in the past two years, without erecting one board. More than enough to cover his dilemma of dealing with reviews (had he started more reasonably, he'd have had less review). I do not think you will be swayed by either his charitability nor any notion he is "unfortunate", to have to go through this process.

LLL-8 I do believe if you limit (or lets even fantasize- eliminate) the three-story elements, it would be a bold, difficult decision at this point, when they've felt so confident in prior approvals. However, it has risen over and over again, the issue of the views, the sense of place and ambiance, and the final stamp has not yet fallen. You can still save our uniqueness and beautiful ocean influence from over development. Again thank you for your time.

Most Sincerely and Respectfully,

Kae A. Mori

page 2

Kae Mori, March 19, 2001

LLL-1. The comments presented do not address the adequacy of the EIR analysis.

LLL-2. Open sky is not defined as an important visual resource in City plans and policies regarding view protection. Several elements referred to by the commentor are, however, referenced in existing City plans and policies as being "important." CEQA Section 15125(d) requires that the EIR "discuss any inconsistencies between the proposed project and applicable general plans and regional plans..." The section states that, " where individual projects would run counter to the efforts identified as desirable or approved by agencies in the regional plans, the Lead Agency should address the inconsistency between the project plans and the regional plans. As a result of this analysis, Lead Agencies (such as the City) may be able to find way to modify the project to reduce the inconsistency." The analysis of project consistency with applicable State and City plans and policies contained in the Revised Second Mitigated Negative Declaration adopted by the City Planning Commission and on appeal by the City Council was found to be legally adequate and approved by the Santa Barbara Superior Court. This EIR reports the findings made by the City regarding plans and policies related to public scenic views. The introduction to Chapter 3.0, Introduction of this EIR, states that, "These decisionmakers will review this project again and are free to re-evaluate this consistency determination..."

LLL-3. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

LLL-4. These comments will be forwarded to the decisionmakers for consideration during their review of the project. The potential growth inducement of the project is addressed in section 7.1. In terms of CEQA, the project would not result in extension of any major infrastructure, so no significant growth inducement would occur.

LLL-5. The comments presented do not address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

LLL-6. Please see response to comment LLL-5.

LLL-7. Please see response to comment LLL-5.

LLL-8. Please see response to comment LLL-5.

DUDEK & ASSOCIATES
A California Corporation

Engineering, Environmental Sciences and Management Services

Santa Barbara Office: 621 Chapala Street Santa Barbara, CA 93101
805.963.0651 Fax 805.963.2074

March 23, 2001

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

City of Santa Barbara
Planning Division
Debra Andaloro, Project Manager
P.O. Box 1990
Santa Barbara, CA 93102-1990

SUBJECT: Entrada de Santa Barbara Project Draft Environmental Impact Report (DEIR) (MST97-00357)

Dear Ms. Andaloro:

Thank you for the opportunity to comment on the above referenced Draft Environmental Impact Report (DEIR). Having reviewed the document, David VanHoy and I have prepared the following comments on behalf of S. B. Beach Properties, L.P.:

MMM-1
- Page ES-1, first paragraph should be revised as follows: "The environmental impact report (EIR) discusses the potential consequences to public views which might result from the construction of the Entrada de Santa Barbara (Entrada) project, on a portion of three blocks in Santa Barbara's Waterfront area near Highway 101."

MMM-2
- Page ES-1, second paragraph should be revised as follows: "Other environmental issues, such as air quality, biological resources, cultural resources, geology, noise, traffic and circulation, parking, water resources, public services population and housing, ~~noise~~, and hazardous materials have already been evaluated in a Mitigated Negative Declaration adopted by the Santa Barbara City Council in August 1999."

MMM-3
- Page ES-2, "Summary of Proposed Project" should be revised as follows: "The Entrada project is located within a portion of three city blocks, including street and sidewalk areas, of properties along State Street, between Cabrillo Boulevard and the Union Pacific Railroad tracks, in the Waterfront area of the City of Santa Barbara."

MMM-4
- Page ES-3, first paragraph should be revised as follows: "Areas A, B, and C as shown on the Area Plan (see Figure ES-1) for a development totaling approximately 133,000 new square feet in size. The project has six ~~inter-related~~ components:".

MMM-5
- Page ES-5, last sentence states "No significant environmental impacts are identified in this EIR and therefore no further alternatives analysis is required to reduce significant impacts." (emphasis added) Page ES-7 states "The conclusion of this EIR is that the Entrada project would result in less than significant environmental effects to important public scenic views...". (emphasis added) Page ES-8 states "Overall, the conclusion of this EIR, focused on public views, is that the Entrada project will result in an adverse but less than significant impact on the environment (Class III). Consequently, no required mitigation measures are necessary in order to mitigate the project's public view impacts to less than significant." (emphasis added)

MMM-5
However, pages ES-7, ES-8 and ES-10 discuss findings required for the approval of the Coastal Development Permits for the Entrada Project and then goes on to discuss possible design changes that may be considered. There is even a discussion of whether or not State Street sidewalks should be narrowed and mitigation of the loss of lower-cost hotel units, neither of which are actual subjects in the DEIR. It is therefore our opinion that this discussion is totally inappropriately included in the CEQA document, especially when considering that the DEIR has concluded that "No significant environmental impacts are identified in this EIR", and "the Entrada project would result in less than significant environmental effects to important public scenic views" and "no required mitigation measures are necessary in order to mitigate the project's public view impacts to less than significant." If such a discussion were ever to occur, it would be more appropriate to place it in the Staff Report to the Planning Commission when findings for approval of the Project are required. Therefore, in this regard, we respectfully request that the "findings" and potential project changes discussions presented on pages ES-7, ES-8 and ES-10, be deleted in the Final EIR.

MMM-6
- Page 1-1 first paragraph, same discussion as Page ES-1, first paragraph.

MMM-7
- Page 1-1 second paragraph, same discussion as Page ES-1, second paragraph.

MMM-8
- Page 2-4, first paragraph, same discussion as Page ES-3, first paragraph.

MMM-9
- Page 4-109, first paragraph, states "Overall, the conclusion of this EIR, focused on public views, is that the Entrada project will result in an adverse but less than significant impact on the environment (Class III). Consequently, no required mitigation measures are necessary in order to mitigate the project's public view impacts to a less than significant level." (emphasis added) However, the following paragraph states "In its review of the land development permit applications associated with the Entrada project, the City may choose to address any public view effects caused by the Entrada project through the imposition of additional conditions of approval related to the project's design and size, bulk, and scale". See comment above relating to pages ES-7, ES-8 and ES-10.

MMM-10
- Page 4-110 last paragraph and page 4-111 first paragraph, see comment above relating to pages ES-7, ES-8 and ES-10.

MMM-11
- Page 5-1, second paragraph states "Alternative 1 is the No Project Alternative, as required by CEQA. No significant environmental impacts are identified in this EIR; therefore, no further alternatives analysis is required to reduce significant impacts." This discussion should also be placed in the summary section of the Final EIR. Additionally, this conclusion emphasizes that there is no CEQA need to make any changes to the Project to reduce aesthetic impacts, and as such, any references to project changes should be removed in the Final EIR.

MMM-12
- Page 5-1, last paragraph states "Because no other alternatives were required to be analyzed in this EIR, the Entrada project is the Environmentally Superior Alternative other than the No Project Alternative." This discussion should also be placed in the summary section of the Final EIR. Additionally, this conclusion emphasizes that there is no CEQA need to make any changes to the Project to reduce aesthetic impacts, and as such, any references to project changes should be removed in the Final EIR

MMM-13
- Page 6-1, third full paragraph states "The Court concluded that a 'fair argument' could be made that the view analysis in the Mitigated Negative Declaration was insufficient." However, this statement is not accurate. The Court concluded that a 'fair argument' could be made that the project may have a significant effect on the environment (visual resources), and as such an EIR focused on visual resources was required, per CEQA Section 15070 (a). This should be revised in the Final EIR

MMM-14
- Page 6-1, last paragraph states "In accordance with Section 15128 of the State CEQA Guidelines, the Second Revised Initial Study, and Final Mitigated Negative Declaration No. ENV97-0452 prepared for the project explain why the project would not result in significant environmental impacts in any of the following areas. The following issues are therefore not further addressed in this EIR, in accordance with CEQA and the Court judgement: Project Aesthetics (e.g., mass, bulk scale, design, light/glare)." However, as stated above in comments on pages ES-7, ES-8 and ES-10, these issues are addressed in the EIR. As such these items should be removed in the Final EIR in accordance with CEQA and the Court judgement.

Regarding the actual visual impact evaluation, Mr. David VanHoy with Lenny Yates VanHoy Architecture, has prepared the following comments:

MMM-15
- Figure 2-7, the physical location of the buildings on the "existing" and "proposed" diagrams should match. The building locations do not move as a result of the proposed street and sidewalk designs. The diagrams should be corrected in the Final EIR document.

MMM-16
- Figures 4-8 through 4-26, after my review of the computer simulations I feel they are of a very high quality and accurately represent the project massing as it relates to views. The simulations do not, however, completely describe the subtle details of the architecture such as moldings, wrought iron, decorative tile, etc. The reviewer must also refer to Figures 2-3, 2-4 and 2-5 for additional elevation detail in order to analyze the positive impacts upon the foreground of existing views when compared to existing conditions.

MMM-17
- Figure 4-9, the size of the palm trees located along the waterfront edge of Area B are shown substantially taller (+20 feet) than the specified variety of palm will achieve considering installation size and the growth period. This must be considered by the reviewer when analyzing the view impact of these palm trees.

MMM-17
- Figure 4-10, same comments as Figure 4-9 above.
- Figure 4-11, same comments as Figure 4-9 above.
- Figure 4-12, same comments as Figure 4-9 above.
- Figure 4-13, same comments as Figure 4-9 above.

MMM-18
- Figure 4-13a, same comments as Figure 4-9 above. Additionally, the Surf-N-Wear Beach House Building provides a very good example of the impact on views of a two story building which is fully set back from State Street and which provides surface parking at the front of the building.

This completes our comments on the Draft EIR on the Entrada de Santa Barbara Project. On behalf of S. B. Beach Properties, L.P., I would like to thank you in advance for your time and consideration of these matters. Should you have any questions regarding our comments, please don't hesitate to give me a call.

Sincerely,

Kenneth E. Marshall

Kenneth E. Marshall, AICP
Division Manager

cc: Bill Levy
Bill Medel
Doug Fell
David VanHoy

Dudek & Associates, March 23, 2001

MMM-1. Comment noted. The change has been made in the Executive Summary.

MMM-2. Comment noted. The change has been made in the Executive Summary.

MMM-3. Comment noted. The change has been made in the Executive Summary.

MMM-4. The project components are appropriately characterized in the Executive Summary as interrelated. No change to the text is necessary.

MMM-5. City decisionmakers may determine that additional project modifications are needed to find the proposal consistent with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and the City's Local Coastal Program policies. Please see the Executive Summary, Areas of Known Controversy and Issues to be Resolved. The Areas of Known Controversy and Issues to be Resolved address planning considerations beyond the environmental impacts identified under CEQA. The issues will be considered by decisionmakers and City staff during future public hearings. The EIR provides facts to support decisionmaker findings, but does not preclude the Planning Commission or the City Council from additional project considerations.

MMM-6. Please see response to comment MMM-1.

MMM-7. Please see response to comment MMM-2.

MMM-8. Please see response to comment MMM-4.

MMM-9. Please see response to comment MMM-5.

MMM-10. Please see response to comment MMM-5.

MMM-11. This language exists in the DEIR Executive Summary, in the second paragraph of the Project Alternatives subsection.

MMM-12. Comment noted. This information regarding project alternatives has been summarized in the Executive Summary Conclusion. Relative to the request to remove references to project changes should be removed, please see response to comment MMM-5.

MMM-13. Comment noted. The change has been made in Chapter 6.0, Impacts Not Found to be Significant.

MMM-14. Please see response to comment MMM-5.

MMM-15. The figure is sufficiently clear to provide the reader a reasonable assessment of project impacts. The dimensions of the existing and proposed improvements within the State Street corridor are identified such that the reader can compare the specific changes.

MMM-16. The comment is noted. The simulations have never been intended to present the complete architectural detail that may be included on final renderings. They accurately define the location and height of proposed structures for use is assessing impacts on important public scenic views. Specific architectural details are not relevant to the impact analysis in section 4.0

MMM-17. The palms indicated on the landscape plans, date palms (*Phoenix dactylifera*), would achieve at a minimum the 30-foot height indicated on the simulation. The height of the pictures used were sent to the project landscape architect and reviewed and approved prior to the simulation preparation. A date palm that fell at the Enterprise Fish Company in the early 1990s was about 70 feet tall.

MMM-18. Please see response to MMM-17. Your comment regarding two-story structures is noted.

To: Debra Andaloro
from: Cars Are Basic
Subject: La Entrada

Ms. Andaloro,

NNN-1 Cars Are Basic is submitting a proposal for a project alternative for the La Entrada project. We wish this to be included in the draft EIR.

Sincerely,
Tom Becker
Tom Becker, CAB
2905 De la Vina
Santa Barbara, CA
681-9533

MAR 23 2001

Suggested project alternative for La Entrada de Santa Barbara

Cars Are Basic is submitting this project alternative for the La Entrada development. CAB does not wish to tell Santa Barbara Beach Properties how to built their project. Instead, our alternative is a suggestion that will preserve State Street and mountain views and allow Beach Properties to build a viable project:

NNN-1
- State Street to remain 4 lanes.
- The Californian Hotel to be a 82 room hotel.
- 5 third floor units removed from area "B" (4050 square feet remain).
- 7 third floor units removed from area "C" (2700 square feet remain).
- All 8 ground floor units on site "B" converted to retail space.

The alternative project will look like this:

- 150 total units (82 hotel rooms, 68 lockout units).
- 29,026 square feet of retail space.
- Same trip generation as the existing site (415 trips per peak hour).

Tom Becker, No Date

NNN-1. No significantly adverse impacts on public views were identified in this EIR. Therefore, no analysis of project alternatives is required to reduce significant impacts on public scenic views. City decisionmakers may determine that additional project modifications are needed to find the proposal consistent with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and the City's Local Coastal Program policies. Your proposal will be forwarded to the City decisionmakers for their consideration.

March 22, 2001

Planning Commission
City of Santa Barbara
Santa Barbara, CA 9310[illegible]

I want to go on record as opposing the La Entrada project as currently proposed.. Our waterfront and the views from that area are priceless and must be protected. You have an opportunity and a RESPONSIBILITY to protect our views from the waterfront area by demanding a more responsible proposal from the developer of the La Entrada project. Two and three story buildings should not be allowed at that location.

OOO-1 If you allow this project to go forth as currently designed, you will have stripped the local residents of our rights to protected views. It's time for you planning commissioners to take bold action and demand changes to the design.

I hope you will listen to those of us who live here and not cater to a transient population and a developer who does not have the preservation of our beautiful Santa Barbara at heart.

Elizabeth T. Perell

Elizabeth T. Perell
47 Rincon Vista Road
Santa Barbara, CA 93103

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Elizabeth T. Perelli, March 22, 2001

OOO-1. The comments presented do not specifically address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

March 23, 2001

Planning Commission
City pf Santa Barbara

Re: La Entrada

Honorable Commissioners,

PPP-1 Please find attached my letter to California Coastal Commission dated April 5,2000. New substantial geological information since the letter, including that which I touched on during public comment of March 15, 2001, raises the degree of importance to the potential hazards of narrowing State Street. Please refer to CEQA section 15126.2 and other sections relating to emergencies and guidelines dealing with "probability" of natural geologic events.

Sincerely,
Steve Dunn

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

April 5, 2000

Agenda No.:W8f
Application No. A-4-sbc-99-200

RECEIVED
APR 0 6 2000
CALIFORNIA
COASTAL COMMISSION
SOUTH CENTRAL COAST DISTRICT

California Coastal Commission
South Central Coast Area
89 S California Street, Suite 200
Ventura, CA 93001

Dear Honorable Commissioners,

This letter was meant to be simply a follow up to my January 13 presentation before you on behalf of local fishermen regarding the serious negative impact "La Entrada"'s narrowing of State Street would create. Appreciating the threat of Tsunami as only inshore mariners and coastal dwellers can, we have always understood that the City of Santa Barbara's approval of the project would increase the safety risk to all.

However, the City's April 4 participation in the Tsunami Hazard Mitigation Workshop further enlightens us as to the potentially disastrous consequences of eliminating evacuation routes from the waterfront area. First convened by California Governor's Office of Emergency Services in 1997, this workshop is part of OES' project: Local Planning Guidance on Tsunami Response. Through the efforts of the OES and coastal county representatives, with funding from NOAA, USC Professor Costas Synolakis was selected to produce inundation projections for selected coastal areas including Santa Barbara

Our community was identified as being particularly vulnerable to a near-source tsunami that could be caused by an earthquake occurring along one suspect subduction zone/fault located approximately twelve miles south of Santa Barbara Harbor. Monstrous waves hitting our shoreline within 10 minutes or sooner would devastate life and property within the low lying waterfront. Inundation would continue into the central city , killing and destroying possibly into areas as high as20 feet above sea level . A strong quake experienced on-shore will be the only warning inhabitants receive for a 10 minute lead time. In this case, little or no public agency emergency response activities will take place. Self evacuation will be the only response, using every existing. vehicle and pedestrian traffic artery leading away from and or above the coast. In the tragic example of Crescent City's 1964 tsunami, the greatest loss of life was due to the second and third waves laden with massive quantities of debris, including much of the port's large salmon fleet

Future tsunami events for us will be similar in some ways to Crescent City. Unfortunately, our high risk area's population density is quite high, compounded by the presence of thousands of transient visitors during peak periods. By far the largest and heaviest non-fixed position structures in the waterfront area are the quasi-permanently moored offshore oil industry support vessels. These and other boats of the fleet will, if not sent offshore prior to a large tsunami, decimate whole city blocks as they are pitched onshore and driven ahead of each successive wave. This is not pure conjecture This is what occurs during large magnitude events. The Port Authority and Port Captain in large seaports and harbors institute mandatory vessel evacuation prior to tsunamis, given adequate lead time.. The discussion in the scientific community is not whether we will or will not experience a highly destructive tsunami. We are beginning to understand that it will arrive one day, and the discussion focus must be on development of proactive strategies for hazard mitigation. It is imperative that existing vehicle thoroughfares be fully retained and recognized as evacuation routes during emergencies. Our 1200 or more boat owners and operators must be guaranteed vehicle access to the waterfront at the time voluntary or mandatory evacuations are ordered. Concurrent to increases in population density and transient visits in the inundation zone, a per-capeta net increase in the number of viable evacuation routes must be achieved in light of the accumulated pre-existing unmitigated negative impacts to human safety.

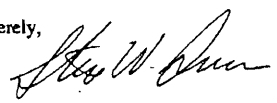
Scientific studies and historic record also include documented evidence of Pacific-wide tsunamis making landfall here, having had long lead times (up to 6 hours), causing more widespread destruction. The multi-agency Pacific Wide Tsunami Warning System provides Tsunami ETAs for specific sites around the Pacific Rim. For coastal communities this system gives us the ability to implement appropriate emergency response plans relative to the first probable tsunami wave arrival. The inundation zone maps are one of the key elements required in formulating the overall Local Planning Guidance on Tsunami Response supplement for local governments. Upon their arrival planning can proceed. California's acknowledgment of the immense risk to public safety posed by tsunami events is borne out by the State's commitment to providing guidance for local emergency response planners. Clearly, with the absence these critical planning resources, the City of Santa Barbara's approval of the La Entrada Project narrowing of State Street can not be upheld. Traffic planning agencies must not proceed until methodology becomes available through the Guidance on Tsunami Response supplement.

Under the California Environmental Quality Act (CEQA) (Pub. Res. Code sec. 21000 et seq.):

....d) Specifies that if a project (a) has the potential to degrade the quality of the environment or to achieve short term goals to the disadvantage of long term environmental goals:
(b) has effects that are individually limited but cumulatively considerable; or,
(c) will cause substantial adverse effects on human beings, then the lead agency must find that the project "may have a significant effect on the environment."
(Pub. Res. Code Sec. 21083)

These CEQA sections, applied to the preceding discussion, clearly require denial of a CDP for this project. From it's inception a full EIR was necessary to expose how great a negative impact La Entrada would have on Santa Barbara. Please reject this project as proposed.

Sincerely,



Steve Dunn
3115 Calle Rosales
Santa Barbara,CA 93105

Steve Dunn, March 23, 2001

PPP-1. The Santa Barbara Superior Court has determined that the previously prepared Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project except for potential impacts on public scenic views. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits. CEQA requires a Supplemental EIR be prepared (section 15162) only when new information is identified that would result in a previously undisclosed impact, or identification of a significant impact that was not previously identified as significant.

Responses to issues raised by the commentor that are not subject to further environmental review are provided below:

Tsunami Planning Issue

The Second Revision to the Initial Study (Pages 19 and 20) analyzed the potential for the Entrada project to result in or expose people to tsunamis and determined that no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project. The Entrada project is located at approximately 10 feet MSL and according to the City's Master Environmental Assessment maps is within the tsunami run-up area. Because the City requires buildings to be constructed to the Uniform Building Code (to withstand 100 year events) and because adequate evacuation plans are in place for the Waterfront area, no significant impacts relative to tsunamis are expected to occur as a result of the Entrada project.

Since the preparation of the Second Revision to the Initial Study and adoption of the Entrada project's Mitigated Negative Declaration (August 1999), new information regarding tsunamis has been published. The California Office of Emergency Services has prepared tsunami inundation maps which estimate the run-up from a worst-case tsunami (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously). The California OES recognizes that its tsunami maps are not particularly useful for land planning, since the assumptions used to prepare the OES map (Magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously) exceed the design criteria for all development except nuclear facilities. The California OES has also produced the Local Planning Guidance on Tsunami Response (no date). The purpose of this document is to "...assist local governments in the initial development of a tsunami response plans and the procedures necessary to deal with a tsunami's impact on their communities."

Neither the OES tsunami inundation maps nor the document Local Planning Guidance on Tsunami Response have identified new information of substantial importance that will result in new significant environmental effects which were not discussed in the Second Revision to the Initial Study.

In addition, the report Seismic Sea Wave (Tsunami) Potential, dated March 28, 2001 prepared by Michael Hoover, Consulting Geologist-Hydrologist (see Appendix G), evaluated the effects of a locally generated tsunami resulting from a maximum earthquake. Such an earthquake (Magnitude 7.4) could cause a wave height of nine to twelve feet and result in the Entrada project experiencing minor flooding. If such an earthquake occurred at high tide (likely recurrence frequency of 600 years) it could result in the Entrada project experiencing significant flooding, but that the structures would not be destroyed and because they are proposed to be built of steel, could be used as evacuation facilities.

The Seismic Sea Wave (Tsunami) Potential also evaluated evacuation of the Waterfront relative to tsunamis. Distant source tsunamis result in relatively small (1 to 5.5 feet) waves in Santa Barbara, and lengthy warning times (usually hours) providing ample evacuation time. An earthquake locally of sufficient Magnitude to generate a significant tsunami would likely also cause collateral damage to roads, liquefaction, slope failures, bridge failures, and scattering of building debris on roadways such that evacuation from the Waterfront via automobile would be impossible. Evacuation from the Waterfront area would be via foot to higher ground (i.e. to the top of the Santa Barbara City College stadium). No change in evacuation conditions would result from reducing the number of vehicle traffic lanes on State Street. Due to the low probability of tsunami occurrences and limited scope of the project, no significant impact would result from exposure of persons to tsunami risk.

State Street Improvements

The following information is provided to explain the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500-foot-long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing does not reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free flow roadway capacity changes from approximately 2,800 to 1,400 vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when lots of pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at LOS B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

This page intentionally left blank.

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

3/21/01

Regarding RE: comment of EIR for La Entrada.

To allow three stories is to destroy the very assets which bring Tourists to Santa Barbara (regardless of high prices) To get away for high rise - high density is a vacation - to enjoy mountains and ocean - in beautiful low rise setting it worth a fortune - Don't destroy the goose that laps the golden egg!

QQQ-1

Benita B. Crane

BENITA B. CRANE

Benita Crane, March 21, 2001

QQQ-1. The comments presented do not specifically address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

RECEIVED
MAR 23 2001

TREVOR J. MARTINSON
ARCHITECT & PLANNER

1849 Mission Ridge
Santa Barbara
California 93103
(805) 965-2385

23 March 2001

Debra Andaloro, Project Planner
City of Santa Barbara
Community Development Department
630 Garden Street
Santa Barbara, CA. 93101

Re: La Entrada de Santa Barbara Draft EIR

Subject: Public Comment

Dear Ms. Andaloro:

The above referenced EIR appears to be seriously flawed in its analysis of the significant public view impacts of this project.

RRR-1 All view angle analysis data and photographs submitted by Penfield & Smith, one of the contributing consultants of the EIR, is misleading and fundamentally biased for the following reasons:

RRR-2 1. The above consultant established and based its data, as noted in Appendix D Photographic Simulation Methodology of the EIR in paragraph 3, that 5.5 feet in height was the camera lens position from the street level. This height is used to simulate the height and perspective of an "average" pedestrian viewer as they would pass by the Entrada project site. This means our "average" pedestrian is six feet tall.

RRR-3 2. Clearly, the consultant failed to include any mention of the Americans with Disabilities Act (ADA) provisions that would factor in the "average" height and perspective of someone in a wheelchair which is around 3.0 feet in height. This would alter the project view angles and perspective in a dramatic and significant manner.

RRR-4 3. It would seem, to most concerned observers, that a fair and true "average" pedestrian viewers eye level would be established somewhere between 5.5 feet and 3.0 feet.

RRR-5 It would appear at this point, for a prudent project developer and his design consultants, to acknowledge and correct this fundamental flaw in the draft environmental impact report. This should be done before allowing any further consideration of this project by planning staff, the City Planning Commission and, of course, our City Council.

If there are any questions regarding the contents of my letter please feel free to contact me at your convenience.

Thank you for the opportunity to comment on this project.

Sincerely,

Trevor J. Martinson
Architect, and Planner

1849 Mission Ridge Road
Santa Barbara, CA. 93103-1857

(805) 965-2385

Fax 965-5457

xc: Citizens Planning Association
League of Women Voters of Santa Barbara County
The Independent
Santa Barbara News Press

Trevor Martinson, March 23, 2001

RRR-1. Please section 8.1 for a list of the individuals responsible for the EIR preparation. Penfield & Smith Engineers provided the profile sections in Figure E-2 to the City for their consideration. The City determined that the view profiles accurately portrayed the view blockage of the Santa Ynez Mountains experienced from the specific viewpoints indicated. These profiles were not used to evaluate specific impacts related to views discussed in Chapter 4.0. The photographic simulations were prepared by Videoscapes, a consultant to SAIC, who was retained by the City to prepare the EIR.

RRR-2. The 5.5-foot camera is considered a reasonable approximation of the population at large. The comment does not consider the height provided by shoes worn by the pedestrian, which would reasonably account for 1 to 3 inches of stature. CEQA Section 15151 states that an EIR will provide a reasonable level of detail regarding the impacts of a project: " the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible...The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." The photosimulations in the EIR fulfill this objective, given the need to provide an average perspective of the population.

RRR-3. Please see response to comment RRR-2. CEQA does not stipulate that an assessment of impacts take into account all potential outcomes. The comment is correct in that the view simulations provided in the EIR would not portray the perspective of disabled individuals. The rule of reason provided in Section 15151 does not require that an EIR evaluate every conceivable impact, and the Americans with Disabilities Act (ADA) does not address the requirement to assess the visual impacts of a proposed project on the disabled population. Project design would be required to comply with all provisions of the ADA. The City Public Works Department, Building and Safety Division plan checkers would be responsible for this compliance.

RRR-4. Please see response to comment RRR-1, RRR-2, and RRR-3.

RRR-5. Please see response to comment RRR-1, RRR-2, and RRR-3.

Paul C. Lamberton
POB 1236
Santa Barbara, CA 93102

23 March 2001

Debra Andaloro, Project Planner
City of Santa Barbara
POB 1990
Santa Barbara, CA 93102

Subject: Entrada de Santa Barbara

I am convinced the Entrada de Santa Barbara development project has correctly received adequate review.

The various citizen review commissions of the city have thoroughly scrutinized the mandated issues. I respect the review process. And do support their cumulative conclusions.

SSS-1 Again a simple reminder; these conclusions were arrived at through rigorous staff review, lengthy public debate and a fully evaluated Mitigated Negative Declaration, honorably negotiated.

The recently submitted Environmental Impact Report of February 2001 again reaffirms the City Planning Commission's original vote of approval.

Congratulations to this Planning Commission for their diligence and the validation of due process.

The community continues to be well served.

Yours truly,

P Lamberton

Paul C. Lamberton

cc Harriet Miller, Mayor
City Council Members
Planning Commission
Coastal Commission
William Levy Investments

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

Paul C. Lamberton, March 23, 2001

SSS-1. The comments presented do not specifically address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

2220 Bath St.
Santa Barbara CA 93105

To: City Planning Commission
Re: Entrada Project

Dear Commissioners,

TTT-1 At the recent hearing regarding views affected by the Entrada project I was most disheartened to see the negative effect this construction would have, not only on the views but also on the entire feeling of the area. To casually dismiss some of the peaks as relatively unimportant and propose that the little tops of others to be satisfactory as "views" shows a serious lack of understanding and appreciation of what Santa Barbara is all about.

This writer has lived in many cities in the United States and I assure you the Entrada project would be a big step towards the erosion of what is unique about Santa Barbara, and the "Anywhere-ing" of this city.

TTT-2 Despite its conforming architecture, the bulk of the combined buildings, the diminished views, the increased traffic and the disappearance of small local businesses will all contribute to creating an anonymous atmosphere incompatible with the spirit of this city.

I urge those of you in whose hands this decision rests to visit or re-visit cities that were once unique like Santa Barbara and see what you can perpetrate or what you can destroy.

Sincerely yours,
Margaret Seaver

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

March 22, 2001

Margaret Searer, March 22, 2001

TTT-1. The comments presented do not specifically address the adequacy of the EIR analysis. Specific topographic features within the Santa Ynez Mountain ridgeline implied in the comment are not addressed in state or City plans or policies regarding protection of visual resources. They therefore were not considered discrete elements in this analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

TTT-2. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

PO Box 5584; Santa Barbara, CA 93150; 805-560-0965

The Planning Commission; City of Santa Barbara

To the Planning Commission:

I have hesitated writing about the so-called "Entrada" development—such arrogance that time-shares, time-shares!, should be considered the entrance to Santa Barbara! A homeowner, voter, living in an area where the streets are cleaned only by the rains (15 North Voluntario Street, 93103), I have felt hopeless about the City paying any attention to ordinary residents. But if those of us who live here do not at least express ourselves then, we, too, share in the blame for what is the increasing touristification.

I have looked at the Levy plans at the library and studied the photos in the Friday, March 16, 2001 News-Press. I also watched some of your commission hearings, but I have not attended or spoken at any hearing.

A resident since the 1960's, I bicycle and walk - and drive my car - along lower State Street and of course Cabrillo Boulevard most weekdays. And even early in the morning on many weekends when the light is clean and you feel you can almost touch the Santa Ynez from the street. I am there at all times of the day and it's a continuing pleasure to look up to the mountains or, heading to Cabrillo Boulevard, catch sight of the ocean. I can't say I've stood at the dolphin fountain more than a couple of times—it's the rolling views from the street and bike paths that I enjoy and a main reason why I go there, have coffee at Hot Spots or just stroll. The California Hotel, blocking some views, is no thing of beauty but at least it serves or served a socially necessary function, low income housing. To give up our views to accommodate tourists is sick-making.

UUU-1

If this development goes forth as presented, that part of my town, our town, will be forever given over to tourists. Those cherished views will be gone, except for "view corridors," tiny slices, glimpses of mountains and foothills from canyons of buildings. This is significant, and if it goes forth then the entire stretch of waterfront from Milpas to Castillo will be given over to visitors. Outrageous that Santa Barbara shoreline should become like every other sunbelt shoreline. Why would people come—and why would residents go downtown? I won't any more. ...Why stay at all in high-priced Santa Barbara when the city's heart beats primarily to the tourist dollar drums?.

The other evening, I watched the City Council meeting on public access and was amazed to hear that the City is apparently is about to formally consider a view ordinance. How extraordinary that it's at the same time the Council is embracing the LevyTown that will block views not just for adjoining homeowners but all of us, without views from our houses who have enjoyed walking on lower State Street.

Please, planning commission members, vote against this massive view-blocking development. Require Mr. Levy to lower substantially the development profile. If nothing else, please vote to delay until there can be a full city-wide discussion of the issue of views, private homeowner and, especially, public.

Yours sincerely,

Betsy R. Cramer

March 23, 2001

Betsy Cramer, March 23, 2001

UUU-1. The comments presented do not specifically address the adequacy of the EIR analysis. The comments will be forwarded to the decisionmakers for consideration during their review of the project.

Ms. Debra Andaloro, Project Planner
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102

March 2001

MAR 23 2001
CITY OF SA...
PLANNING D...

RE: La Entrada Project

Dear Ms. Andaloro,

Please include my comments in the final EIR for further review by the Planning Division, Community Development Department of the City of Santa Barbara.
Note: The following was largely presented in person before the Planning Department, Thursday, March 15, 2001.

I would like to take this opportunity to commend both Mr. Levy and our various City planning agencies for their attempts to address the need to upscale some of the more distressed buildings along lower State and adjacent streets.

VVV-1 This said, however, the so-called 'La Entrada' project in its present form is NOT the solution. As a 51 year native resident of Santa Barbara I have personally observed many projects throughout the years which have been scrutinously evaluated to enhance the perception of what distinguishes Santa Barbara from other areas and makes it unique to visitors and residents alike. I applaud the efforts and diligence of those who help shape this vision. Despite more than 20 reviews however, La Entrada is still far too massive, dense and obstructionary. Due to the requirements for a draft Environmental Impact Report by outside judicial review we can see more clearly, through detailed computer photo simulations, just how out-of-scale this nearly 3 city-block megalith remains.

VVV-2 Since the purpose of the draft EIR is specifically to address the issue of views let us remind outselves what natural characteristics make Santa Barbara unique. Our town (I can still use that word, but guardedly) is cradled between the vast blue ocean horizon and the panoramic crestline of the Santa Ynez Mountain range. Webster's defines the word *panorama* as *"an unobstructed or complete view of an area in every direction"*. Although we can't be naive to think that buildings and vegetation can allow us to look unhindered around us at all times, let us be specific as to how this permanent reshaping of our vital Santa Barbara entryway would obscure our essential mountain view forever in this vital beachfront area. If we refer to View 7 of the draft EIR our mountain view is confined to a mere sliver, View 8 continues this diminishment significantly and Views 5, 6 and 10 obliterate it completely and replace a 15 mile visibility with a seamless 42 ft. high roofline facade. The result is claustrophobic and boxy reducing the second and third blocks of State Street to a corridor. Any trace of openness found in the natural elements of Santa Barbara is lost.

VVV-3 It is interesting to note that the City chose to validate its Mitigated Negative Declaration determination during the hearing by showing View 6. This view is an extreme wide-angle from the vantage point of the Dolphin Fountain. At this distance there is little indication of the Entrada project at all. [Nor is there much apparent impact from the Courthouse Tower for that matter]. The impact is most evident in Views 7, 8 and 10. With the benefit of the photo simulations we can see this density and the true massiveness of this project from State Street and along the

VVV-3 Mason St. corridor. The City did not call for detailed simulations but instead was satisfied with chalk lines to show the narrowing of State Street from 4 lanes to 2 and 'balloons' to show the basic building heights. How can this possibly demonstrate the total impact to be felt? It is obvious to see from these graphics just how large this barricade would become.

VVV-4 After landscaping becomes established the interweve of palm fronds, trees and other plantings would complete the mountain view obstruction. If there are any doubts, refer to View 7, looking across State Steet through area B Paseo and View 10a, looking North on State Street from BeBop Burgers Restaurant, for example.
It should further be mentioned that palm trees, although an important icon of Southern California have fronds which do not merely grow upright as shown in View 8 but hang down along the trunk, completing the near total mountain view loss from these essential vantage points.

VVV-5 How can we measure how spaciousness, the concept of space and horizons, effects one's own soul and spirit? The City's own General Plan acknowledges the worth of this by stating that *"maintaining the expanse of views and feeling of openness"* is one of only four of its stipulated primary objectives in the development of the project site. The DEIR mocks this question by visually asking how one will feel when standing on State Street from View 7, 8 or 10 (!)
But let us go further to the core issue and question asked of the DEIR (and subsequent hearings):

> "Does the character of the Entrada project adequately reflect or create a 'small town' ambiance? Does it provide an appropriate sense of 'openness', 'lack of congestion', 'naturalness', and 'rhythm' with the existing character of the Waterfront along State Street?" (page ES-6 of DEIR)

VVV-6 Hear Ye Santa Barbara...once it's built it's permanent! Let's try now that we still have the chance to create a lasting project which is less dense and obtrusive. Let's scale it back, cut the roofline down to 2-stories, maintain the critical 4-lanes through to the beach, and continue on until it *feels* right. Let's address the benefits to the general public, the permanent residents of Santa Barbara, and the weekend tourist, rather than just buckle to the persistence and deep-pockets of a few developers who will create a project of privatization enjoyed mostly by a few priviledged owners. Let's ask ourselves, where's the trade-off here?

VVV-7 Let's see a 3-D scale model of what this project will look like in its current stage of development and put it on display at the Falkner Gallery for those who can't take off from work to attend the mid-day Planning Commission hearings.

VVV-8 Then let's rephrase the term: "If you build it they will come" to rather "They will come because we choose not to over-build."
Tourists come here in droves for a chance to get away. For the most part they are escaping the crowded, noisy, overdeveloped cement and stuccoed congestion from whence they came.
Let's give them and us that chance.

Submitted by John R. Barron, 51-year Santa Barbara native resident

John R. Barron, March 23, 2001

VVV-1. The comment presented does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

VVV-2. The visual expectations as identified in existing plans and policies refer to Local Coastal Plan policies that define existing visual characteristics of the Waterfront (please see section 3.3, Local Coastal Plan). For example the Waterfront Area Aesthetic Criteria for New Development Assessment states, "Views to the foothills and mountains are still largely unimpeded by structures; in particular, the views from Stearns Wharf, Chase Palm Park, and East Beach offer unparalleled beauty." "Views are the most important dimension of naturalness. These views are to the ocean, other points along the Waterfront, and to the foothills and mountains. The contrast between the sweep of the coastline and the sweep of the mountains is especially dramatic and heightened by the linear elements of Chase Palm Park and Cabrillo Boulevard." The extent to which the views analyzed in the EIR are consistent with these characteristics is used to determine the relative importance of its public scenic view quality. "Panorama " is not a term or visual concept defined in City plans and policies that requires protection. The lower State Street area is correctly characterized as an urban transition from the Waterfront that does have sweeping views of the Santa Ynez Mountains and coastline, and the commercial district to the north. The EIR acknowledges that the View 7 is a view corridor with views of the Santa Ynez Mountains, and therefore represents an important visual resource. The text points out, however, that this is not a distinctive, or unique view along lower State Street. The text of section 4.4.8, View 7, has been revised to clarify these points. The text identifies that the reduction in the view corridor width would not substantially degrade the important public scenic view. The view blockage would be adverse, but not substantial, as the corridor would be maintained, and the Santa Ynez Mountain ridgeline would be visible. Therefore, the important view corridor quality would be maintained. The text has been revised to provide clarification regarding the lack of substantial degradation, blockage, or impairment of the public scenic view. Please also see response to comments F-43 and F-44.

VVV-3. Comments associated with the preparation and presentation of the Second Revised Mitigated Negative Declaration do not address the adequacy of adequacy of the EIR analysis. View 9 (Figure 4-16) evaluates the proposed Entrada project impacts on the Mason Street corridor.

VVV-4 The Proposed Condition with landscaping simulations accurately portray the maturity of species identified on project landscape plans. Ken Doud, the expert responsible for the simulations, is also a horticulturalist and landscaper with nearly 20 years experience in plant growth rates.

VVV-5. The comment addresses the interpretation of City plans and policies that will be considered by City decisionmakers.

VVV-6. The comment presented does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

VVV-7. A three-dimensional model of the proposed project would not be capable of demonstrating the potential impacts to important public scenic views. CEQA Section 15151 states that an EIR will provide a reasonable level of detail regarding the impacts of a project: " the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible...The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." The photosimulations in the EIR fulfill this objective.

VVV-8. Please see response to comment VVV-6.

This page intentionally left blank.

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

To: Planning Commission of the City of Santa Barbara
Regarding: The La Entrada Project (Levy - developer)

March 22, 2001

To the Planning Commission:

We as citizens of Santa Barbara congratulate you for your part in giving us such a beautiful place to live our daily lives. As residents of the Upper East neighborhood we do nearly all of our business and shopping in the downtown area. Our intimacy and love of this area have moved us to voice our opinion on this project which will have such a large visual impact on such an important area. We also acknowledge that Santa Barbara's prosperity owes much to tourism, and that this city is made up of a number of individuals who have vast wealth based on their real estate developments downtown. This City has catered to both these groups, many times to the dismay of local Santa Barbarans.

WWW-1 Residents and tourists alike do not want Santa Barbara defined with the too tall neo-Spanish Entrada project. It smacks of a thinly disguised developer project with its foremost goal to make lots of money for the developer. Santa Barbara historically is about a casual and somewhat understated Spanish style elegance that puts the spectacular natural setting center stage. Montecito estates can be big and tall and be showpieces of ostentatious spending.

Please work with Levy or another developer to create a different kind of project for such a spectacular spot. A redesigned piece of architecture should be open, feature the landscape, be about sunshine and sea breeze. Let this architecture say welcome to all, and emphasize all the goodness of nature we have to offer, the rest of State Street is already about material consumption. Make this area a smoother transition between nature and goods and services.

We like the idea of downtown mixed use (hopefully with some affordable housing units) development. We'd like to see some sensitive artful development of the downtown area to the east of State St. Thank you for your consideration of our opinion.

Sincerely,

Dr. John Kunz and Joy Kunz

FAX 897-1904

Dr. John Kunz and Joy Kunz, March 22, 2001

WWW-1. The comment presented does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Santa Barbara Planning Commission
623 Garden St
Santa Barbara, Ca. 93101

Dear Commissioners,

I would like to express my concern regarding a few planning items recently discussed in the Planning Commission hearings. Specifically, I would like to address the issues concerning the La Entrada Project and the Yanonali Project.

XXX-1 Concerning the first,the La Entrada, I would like to stress the importance of including the correlative issues of narrowing of State Street and environmental impact on Mission Creek in the revised EIR. The narrowing of State Street does have a significant traffic impact and is opposed by so many Santa Barbarans that the Planning Commission should consider carefully if this aspect of the project is desirable or feasible for the Santa Barbara Community.

XXX-2 Regarding the second project, the Yanonali Project, I believe that there are significant consequences which impact our entire planning process if the Yanonali Project is passed with catagorical exemption. I strongly believe that all projects require an EIR to conform to the planning regulations we have chosen for our community.

Please consider these ideas while considering the Projects and how the planning process should unfold.

Respectfully yours,

Deborah Slaght

Petition to Santa Barbara City Planning Commission and City Council regarding the Entrada de Santa Barbara project.

We, the undersigned, object to the mass, scope, bulkiness, density, and obstruction of views of the Entrada de Santa Barbara project and urge both Santa Barbara City Planning Commission and the City Council to deny or revoke a building permit for this project. Despite the environmental impact report which states that no important views are obscured, we feel that important views are obscured and wish the City to respect the Vision Committee's work in recommending a lower profile for State Street and the area south of the Highway 101.

name	street address	city	zip
Susan Stucco	4983 Dekaven St.	Ventura	93003
DAN FEDERS	P.O. Box 30920	SB	93130
Joan Atwater	1516 Marguerite Ter.	SB	93101
Michael Kennedy	153 La Vista Grande	SB	93103
Marcia Zimmerman	761 Tercero Lane	SB	93105
Andrea Quirk	3520 Santa Maria Ln	SB	93105
[illegible]	2415 Calle Galicia	SB	93109
[illegible]	3423 Tierra Bella	SB	93105
[illegible]	3060 Lucinda Lane	SB	93105
Kailey Child	3315 B Sea Banner	Summerland	93067
[illegible]	205 W Islay #4	SB	93101
[illegible]	807 E Figueroa St #TC	SB	93103
[illegible]	2255 Modoc Rd	SB	93101
[illegible]	6345 Sabado Tarde	Goleta	93117
[illegible]	[illegible]	Ventura	93004

#3

MAR 23 2001

Deborah Slaght, No Date

XXX-1. The Santa Barbara Superior Court has determined that the previously prepared Second Revised Mitigated Negative Declaration adequately addressed all environmental issues associated with the Entrada de Santa Barbara project, except for potential impacts on public scenic views. Therefore, this comment does not address the adequacy of the EIR that focuses on potential consequences to public scenic views. Please see EIR section 2.4.6, The City Council's Review and Approval of the Entrada Project on an Appeal. Your concerns will be forwarded to City decisionmakers for their consideration during subsequent public hearings regarding the proposed project's land use and design merits.

Although the proposed improvement to State Street is not within the scope of this EIR, the following information is provided to explain why the proposed State Street improvements would not result in additional congestion or result in emergency access concerns.

Currently, State Street northbound from Cabrillo Boulevard has a single travel lane. This single lane turns into two lanes approximately 175 feet north of Cabrillo Boulevard. Only one lane exists because whether turning left or right from Cabrillo Boulevard to State Street, or traveling straight from the Wharf, only one lane of traffic can move on State Street at a time. Because only one lane of traffic can ever feed State Street northbound, one travel lane is all that is needed northbound below the railroad tracks.

Currently, State Street southbound in the project vicinity is two lanes. Narrowing is proposed for approximately 150 feet of the middle section of the 500 foot long State Street city blocks between Yanonali Street and Mason Street, and Mason Street and Cabrillo Boulevard. The narrowing does not reduce the number of lanes at the intersections of State Street and Cabrillo Boulevard and State Street and Mason Street.

When measuring if the narrowing project will increase congestion, two types of vehicle capacity were studied: intersection capacity and the lane capacity between intersections. Typically, intersections are the limiting factor that will determine a roadway system's capacity, not the lane capacity between intersections.

A travel lane between intersections has a free flow capacity of 1,400 to 1,600 vehicles per hour. Therefore, by reducing two lanes to one lane in the middle of the block, the free flow roadway capacity changes from approximately 2,800 to 1,400 vehicles per hour. This remaining amount of roadway capacity (1,400) is more than State Street currently carries or is predicted to carry.

The intersection at State Street and Cabrillo Boulevard has a capacity to process vehicles at about 600 to 900 vehicles per hour. This capacity will not change with the proposed lane reduction, which does not effect the number of lanes at the

intersection. Therefore, the southbound lane capacity with the proposed lane reduction (1,400/hour) will continue to exceed the capability of the State/Cabrillo intersection. In other words, the lane reduction will not increase congestion.

Although the lane reduction will not increase congestion, congestion will continue to exist at State Street and Cabrillo Boulevard on sunny summer weekends when lots of pedestrians are present. It should be noted that the pedestrians are the source of vehicle congestion at this intersection. In other words, if the pedestrians were absent with the same number of vehicles present, the intersection would operate at LOS B.

Regarding emergency access, the narrowing of certain portions of State Street will not effect the emergency vehicle access. Even with the narrowing in place, there will be enough room provided on both sides of street for non-emergency vehicles to pull over and allow emergency vehicles to pass.

Although outside the scope of the EIR the following addresses issues related to the proposed Lower Mission Creek Flood Control Project and its potential, together with the Entrada project, to result in significant impacts on the Mission Creek environment, thereby impacting the water environment, riparian habitat and sensitive species within the creek.

The Second Revision to the Initial Study (Pages 21 and 44) indicated that the proposed project will not have a significant impact on the natural communities or wetland habitats within Mission Creek, nor will changes to the drainage flow of Mission Creek occur as a result of the proposed project.

At the time the Second Revision to the Initial Study was prepared and approved (August 1999), the preferred plan for the proposed Lower Mission Creek Flood Control Project was not known. However, in anticipation of changes to the Mission Creek stream channel, in conjunction with the proposed Lower Mission Creek Flood Control Project, the Entrada de Santa Barbara Conditions of Approval contained in City Council Resolution No. 99-098 contain Condition G.13 which states:

G. Prior to issuance of demolition, grading or building permit for the proposed project:

13. The applicant shall review construction requirements with the Public Works Department to ensure that the development on Site A is consistent with approved plans for the improvement of Mission Creek at the time of project construction on Site A to the extent feasible. The Owner shall make all feasible changes to the plans as reasonably required by the Public Works Department. Costs for plan revisions shall be borne by the applicant.

In September 2000, the US Army Corps of Engineers released the Feasibility Report, together proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project. The recommended plan according to the Feasibility Report is Alternative 12. Appendix H shows Area A in this alternative as previously approved with the existing alignment and the proposed Alternative 12 alignment of Lower Mission Creek superimposed. As indicated on this Mission Creek Alignment alternative,

if the Alternative 12 alignment of Lower Mission Creek is ultimately approved the proposed buildings on Area A (as previously approved) would be at the top-of-bank of Lower Mission Creek. However, as also indicated on this plan, Alternative 12 includes the demolition of buildings adjacent to the portion of the building on Area A closest to Mission Creek. In addition, a habitat restoration area is proposed between the west elevation of the building on Area A and the proposed top-of-bank of the Lower Mission Creek. According to the proposed Final EIS/EIR for the Lower Mission Creek Flood Control Project, these components of Alternative 12 were found to offset any impact resulting from the building on Area A encroaching within the required 25 foot setback from the top-of-bank of Lower Mission Creek.

The Lower Mission Creek Flood Control Project has yet to be considered for approval, its final design has not been determined and remains unknown at this time. In addition, the staff recommendation for consideration of the Entrada project on its land use and design merits would include a condition similar to, if not exactly the same wording as, City Council Resolution No. 99-098, Condition G.13 described above.

Therefore, while the Lower Mission Creek Flood Control Project proposed alignment has been further refined since preparation of the Second Revision to the Initial Study, this additional information will not result in new or substantially more severe significant environmental effects which were not discussed in the Second Revision to the Initial Study.

XXX-2. The comment presented does not address the adequacy of the EIR analysis.

YYY-1

Petition to Santa Barbara City Planning Commission and City Council regarding the Entrada de Santa Barbara project.

We, the undersigned, object to the mass, scope, bulkiness, density, and obstruction of views of the Entrada de Santa Barbara project and urge both Santa Barbara City Planning Commission and the City Council to deny or revoke a building permit for this project. Despite the environmental impact report which states that no important views are obscured, we feel that important views are obscured and wish the City to respect the Vision Committee's work in recommending a lower profile for State Street and the area south of the Highway 101.

name	street address	city	zip
Elise Simmons	340 Rutherford St #73	Goleta	93117
Roberta [illegible]	816 Cheltenham Rd	Santa Barbara	93105
Carolyn Callahan	3199 Padaro	Carp.	93013
Diane Nevelo	3974 Via Lucero #15	Santa Barbara	93110
Anne C Chesner	4817 Winding Way	Santa Barbara	93111
[illegible]	207 Cordova Dr	Santa Barbara	93109
Gretchen Emerding	742 Cieneguitas Rd #A	Santa Barbara	93110
Jen Stemp	1120 N. Nopal St. #15	Santa Barbara	93103
Katherine M. Raschka	806 Fawn Place	Santa Barbara	93105
Jeannette Todd	97 Saint George Place	Goleta	93101
Grant S. [illegible]	407 E. PADRE ST.	SANTA BARBARA	93103
[illegible]	5530 Berkeley Rd.	Santa Barbara	93111
Hattie M. Berenford	150 La Vista Grande	Santa Barbara	93103
Janet S. [illegible]	844 [illegible] Lane	Santa Barbara	93110

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

#1

Petition to Santa Barbara City Planning Commission and City Council regarding the Entrada de Santa Barbara project.

We, the undersigned, object to the mass, scope, bulkiness, density, and obstruction of views of the Entrada de Santa Barbara project and urge both Santa Barbara City Planning Commission and the City Council to deny or revoke a building permit for this project. Despite the environmental impact report which states that no important views are obscured, we feel that important views are obscured and wish the City to respect the Vision Committee's work in recommending a lower profile for State Street and the area south of the Highway 101.

name	street address	city	zip
Kim Haddix	241 E. Calle Montilla	SB	93109
[illegible]	1226 Olive St	SB	93101
[illegible]	5395 Star Pine	Carp	93013
[illegible]	290 Apple Grove Lane SB	SB	93105
Martha Petty	1453 Crestline Dr. S.B	S.B	93105

RECEIVED
MAR 23 2001
CITY OF SANTA BARBARA
PLANNING DIVISION

#4

Petition to Santa Barbara Planning Commission and City Council regarding the Entrada de Santa Barbara project, March 23, 2001

YYY-1. The comment presented does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

Public Comments

ZZZ-1 Tanya Gulesserian, of the Environmental Defense Center, representing the Citizens Planning Association and the League of Women Voters, stated that the DEIR is not adequate because it is not an independent assessment prepared by an unbiased firm. She expressed strongly that the DEIR fails to meet the requirements of CEQA. She stated that the document is inconsistent with local law and policies in that there are several losses of views. Ms. Gulesserian stated that the thresholds of significance used in the DEIR are different than the thresholds of significance used in the previous environmental review of the proposal and that the new thresholds of significance did not receive the required public review. She further stated that the DEIR is inadequate because it does not include new information related to Mission Creek, tsunami planning, and traffic and circulation impacts. She requested that the Environmental Review Committee be reinstated.

ZZZ-2 Lawrence Headley, representing the Citizens Planning Association and the League of Women Voters, stated that he does not support the DEIR analysis. The view impacts have not been addressed and the lack of open space is important to the community. He expressed that every view from all angles should be considered. Mr. Headley stated that he would be submitting his view impact assessment methodology in writing.

ZZZ-3. Catherine McCammon, President of the Citizens Planning Association, expressed that the public did not get what they wanted in that items that were requested during the scoping for the DEIR were not addressed in this DEIR. She stated that this is not an unbiased report. She stated that the simulations show significant view impacts. She feels that peak hour traffic trips will be a significant impact to this area and should be seriously considered per the Urban Crossroads Report submitted.

ZZZ-4 Beverly King, President of the League of Women Voters, expressed her disappointed in the document proposed and would like it to be revised. She stated that the conditions did not match the photographs and feels that five view points in heavily used areas show significant impacts to the community. Ms. King referred to the evidence provided by the League's retained expert Lawrence Headley. She continued by requesting that the DEIR be revised to include project alternatives, and to addresses new information regarding loss of low cost housing, Mission Creek, and tsunami planning requirements. She requested that the Environmental Review Committee be reinstated.

ZZZ-5. Katie Smith Tretheway, Consultant to non-profit organizations and representing Old Time Santa Barbara for New Generations, stated that she supports the project and the DEIR. She expressed her gratitude to the applicants and the City for this addition to the community.

ZZZ-6. Leon Stoddard, 208 Daytona Drive, stated his concern for what he believes to be a discrepancy in the wide-angle photographs taken for this document with a 25 millimeter focal length lens. He submitted his own photographs to the Commission of the same views taken with a 50 millimeter lens which he said represents the normal human view.

ZZZ-7. John Barron, of Burton Circle, stated that he commends the applicants and Staff for their attempt to address the need to upscale some of this distressed area. However, he feels that the project in its present form is still too massive, too dense, and out of scale for the area and feels the project needs more work.

ZZZ-8. Bruce Rittenhouse, 622 W. Carrillo, expressed that a process is in place for a reason and this is what determines whether or not a project gets built. He stated that this project has gone through the required City process and hearings and feels that the project should move forward.

ZZZ-9. Steve Dunn, representing local commercial fisherman and boaters, stated his concern for tsunamis and tidal waves in relation to this project and does not feel that the DEIR adequately addresses these issues.

ZZZ-10 Chris Chatto, representing Citizens Planning Association, stated his concern with the scale of the project and does not feel the DEIR is inadequate. He expressed his concern for the loss of affordable rooms at the California Hotel due to this project. He feels that Mission Creek should have some consideration and relative environmental creek impacts need to be addressed.

ZZZ-11. Lisa Ann Kelly, 1724 Olive Avenue, stated that the existing views and open space of the waterfront area will be seriously compromised by this project, that the location of view points was not adequate, and that the project will create an urban-canyon effect and be a precedent for over building.

ZZZ-12. Elisabeth Donati, representing Streets R Us, expressed that the DEIR is not adequate. She is very concerned about preserving the community's views and would like them retained.

ZZZ-13. Reggie Drew, 22 State Street, stated that he supports the project and the DEIR, and tourist trade needs the upgrade.

ZZZ-14. Steve Engles, 1330 Cacique Street, expressed that all the processes have been completed and feels this gateway beautification project should move forward.

ZZZ-15. Skip Harkson, 965 Miramonte, stated that he supports the project, the DEIR and feels this project should proceed.

ZZZ-16. Kristin and Eric Hammer, owner of Hot Spots, expressed that they support the project, the DEIR and feel that the project brings great aspects to the area.

ZZZ-17. Maggie Warkenten, citizen, stated that she supports the project and would like the process to move forward.

ZZZ-18. Jill Lord, 4066 Bithynia Road, expressed that she would like the opposing public to consider the positive impact the proposed project will bring. She supports the DEIR.

ZZZ-19. Grace Porter, stated that she supports the project in that it would result in a positive impact to views in the area.

ZZZ-20. Roy Millender, 340 Old Mill Road, stated that he supports the project and would like the process to move the project forward.

ZZZ-21. William Porter, 5998 Cuesta Verde, expressed that he supports the project and will appreciate the new views and enhancement the project will bring.

ZZZ-22. Sue Higman, 3408 Cliff Drive, stated that she supports the project and feels the project's architecture is right for this area and the project is special to the area.

ZZZ-23. Laura Rasmussen, citizen, stated that she was disappointed in the DEIR.

ZZZ-24. Dave Giorgi, 950 Glen Annie Road, expressed that the DEIR confirms that findings of the previous environmental review and that he supports the project and feels that the project should move forward.

ZZZ-25. Sandra Millender, 340 Old Mill Road, stated that she supports the project and feels that views from Cabrillo Boulevard are more important for the area, not State Street

ZZZ-26. Stan Los, 224 Anacapa Street, expressed that he and his wife Connie, support the DEIR, that the baseline condition is blighted, and that while the project will change views, the impacts will not be significant. He stated that he supports the project and would like it to move forward.

ZZZ-27. Lee Moldaver, citizen, stated that he felt the DEIR was a good faith effort. He submitted a postcard to the Commission that shows aerial views of the area in question and does not feel that this project is out of scale, nor that it will obstruct any significant mountain views. He stated that he supports the DEIR and the project.

ZZZ-28. Monique Hartley, 2770 Glendessary Lane, stated that she supports the project and feels that views will be enhanced through this proposal and would like the project to move forward. She noted SAIC's creditability and reputation.

ZZZ-29.Catherine Gaughen, representing the Santa Barbara Chamber of Commerce, expressed that this project has long been supported because it will be an asset to the community. She stated that the DEIR validates the City's original conclusion that this project will not significantly impact views and should be approved.

ZZZ.-30. Olivia Rojas, 1318 Pitos, stated that she supports the project and would like to congratulate City Planners at this time, on their great job in the beautification of the City. She feels the DEIR should be approved and the process should move forward.

ZZZ.-31. Irene Martinez, citizen, expressed her support for the project and feels the area as it exists is an eyesore and the proposal greatly enhances the area. She stated that in the Waterfront, the important views are of the mountains, ocean, boats, and Stearns Wharf.

ZZZ-32. Angeles Perez, citizen, stated that she supports the project because it enhances Santa Barbara, because the Planning Commission helped design it, and because the DEIR states that the project will protect views. She would like it to move forward.

ZZZ-33. Debrah Constantino, citizen, expressed that she appreciates the process that strives to have this City look as it does and supports the project.

ZZZ-34. Ken Workenstein, 1530 San Miguel, Police Department volunteer, Host of City Visitors, stated that he supports the project and feels the project will greatly enhance the area. He noted that no one takes a picture of the California Hotel across to the project site.

ZZZ-34. Dale Ferguson, representing the Eastside Visitor Association, expressed that he supports the project, that businesses in the Waterfront area need Entrada, and that he would like it to move forward and feels this project is something to be proud of. He noted Entrada is 41 feet high while the Bekins Building is 71 feet high.

ZZZ-35 Jill Benamar, 120 El Paseo, stated that she supports the project, feels that the DEIR confirms that the project does not have any significant view impacts, and would like it to move forward.

ZZZ-36. Miguel Avila, 28 Betty Drive, expressed that he supports the project and feels the project will enhance the visibly deteriorated area. He stated that in the Waterfront area, one's

attention is toward the beach area, not the project site, which is blighted.

ZZZ-37. Paul Lamberton, representing Old Town Merchants, stated that the view from Moby Dick Restaurant is great, but that the existing view in the project area is not great. The project would have no significant change to views. He supports the project, supports the DEIR and would like it to move forward.

ZZZ-38. Dale and Sandy Kopitzke, 5164 Walnut Park Drive, expressed their support for the DEIR which confirms the previous environmental review, and their support for the project.

ZZZ-39. Leslie Crandell, 137 La Vereda Road, stated that she supports the DEIR, supports the project and feels the project will enhance the area. She stated that the Issues to be Resolved section of the DEIR are not CEQA issues and should not be included in a CEQA document.

ZZZ-40. Leslie Crandell read a letter for Nicola LeBlanc, 534 Mills Way, the letter stated that Ms. LeBlanc supports the DEIR and feels that this project does not affect the views significantly. She would like the process to move forward.

ZZZ-41. Barbara Giorgi, 950 Glen Annie Road, expressed that the project will enhance the area.

ZZZ-42. Shelley Sund, representing Cycles-4-Rent, stated that she opposes the narrowing of State Street and feels both the opposing and supporting sides have brought forward many good points. She would like State Street to remain the width that it is now.

ZZZ-43. Connie Hannah, representing the League of Women Voters and Sustainable Communities Study Group, expressed that she opposes the project and the process, does not concur with the DEIR concerning view issues, and requests the new information items be addressed.

ZZZ-44 Larry Crandell, Jr., 217 E. Anapamu Street, stated that he supports the DEIR findings and feels there is no legal basis to deny the project and would like it to move forward.

ZZZ-45. Tom Becker, representing Cars are Basic (CAB), requested that all their submitted scoping comments be addressed in the EIR.

Chair House read the following speaker slips into the record:

ZZZ-46. June Hammond, Streets R-Us. Supports the project.

ZZZ-47. Bettie Elison, citizen. She stated that mountain views are significant.

ZZZ-48. Christina Eliason, 5020 Walnut Park Drive. Her comments do not support the DEIR and has great concern for the views that will be lost by this project.

ZZZ-49. Bette Eliason, 5020 Walnut Park Drive. Her comments stated that the view impacts of this project are significant and does not support the DEIR or the project.

ZZZ-50. Janice Adair, citizen. Her comments support the DEIR and the project and would like it to move forward.

ZZZ-51. Charles Hanson, citizen. His comments oppose the project due to the impact on public views and conflicts with the Coastal Act.

ZZZ-52. Tanny Keeler, 2420 Garden Street. His comments oppose the project and he feels that it obstructs the sweeping mountain views.

The following letters were received prior to the hearing:

Reggie Drew, owner, Wheel Fun Beach Rentals and Santa Barbara Trolley Company, 22 State Street
Dr. Charles L. Hanson, P. O. Box 21545
Marcy Crandell, Crandell Realty,137 La Vereda Road
Peter C. Jordano, President, Jordano's Incorporated, P. O. Box 6803
Leslie Crandell, Crandell Realty, 137 La Vereda Road
Nicole LeBlanc, 534 Mills Way, Goleta
Mr. & Mrs. Stephen Petersen
K. Kassity
Bonnie Alexander, 221-C West Quinto Street
Albert Eichstaedt, AIA, P. O. Box 21525
Mr. & Mrs. A. Toye, 2610 Mesa School Lane
Maria Rabtin, Tri-County Court Reporter, 929 Santa Barbara Street
Kathiann Brown, 145 Vista de la Cumbre
Gregory Tice, Vice President, Sotheby's International Realty, 1106 Coast Village Road, Ste. D
James B. Rickard III, Sotheby's International Realty, 1106 Coast Village Road, Ste D.
Kay A Mori
Ann Fenton
Catherine S. Walker, 2917 La Combardura Road
Stuart D. Farber
George Relles
Tanny Keeler, The Hoffman House, 2420 Garden Street
Beverly King, League of Women Voters of Santa Barbara, 1217-A De La Vina Street
Catherine McCammon, President. Citizens Planning Association, 916 Anacapa Street
Ms. Tanya Gulesserian, Staff Attorney Environmental Defense Center, 906 Garden Street

Commissioners made the following comments:

ZZZ-57. The DEIR is a very thorough report.

ZZZ-58. On Page 4-27, View 1 viewpoint location should be moved expanded to the right to provide a for context of building mass.

ZZZ-59. For each view as an example, for View 1, a north south section through Cabrillo Boulevard and through the project would be helpful.

ZZZ-60. A matrix indicating the DEIR findings for each of the 19 views would be helpful.

ZZZ-61. Provide descriptions and analysis for each view, but leave the significance conclusion to the end.

ZZZ-62. Agree that all are Class III impacts.

ZZZ-63. The sky is an important resource and important to the open feel of the Waterfront and needs to be addressed in the DEIR, e.g. View #10 around.

ZZZ-64. Many of the views of the mountains from the project area are not important mountain views.

ZZZ-65. Why are no alternatives addressed?

ZZZ-66. A photograph of the Harbor View Hotel in relation to how high the hotel is to this project is desired to be included.

ZZZ-67. Views 5, 6, 7 & 8 do give the appearance of important views and a significant change in character.

ZZZ-68. Improve the view in Views 1 and 9 (i.e., poles) would be improved.

ZZZ-69. A description of a wide angle lens vs. a normal lens in the report is desired.

ZZZ-70. The DEIR points to the need to inventory important public scenic views in the Waterfront area.

ZZZ-71. For future reference, design changes to project elements seen in View 7 will be needed for policy consistency, not for EIR.

ZZZ-72. There is concern that there is no Environmental Review Board and this puts the City and the Planning Commission at a disadvantage concerning help with the review of these reports.

ZZZ-73. Elimination of overhead utility lines should not be called out as a mitigation measure.

ZZZ-74. Views 5 and 6 are important public scenic views.

ZZZ-75. Thresholds for impact significance need to be more clear.

ZZZ-76. If a baseline condition includes properties in disrepair, new development doesn't necessarily equal better.

ZZZ-77 The EIR is an objective appraisal, and the overall conclusion of the DEIR is accurate.

ZZZ-78. Would like to see alternatives with a reduction of massing on Views 5 and 6 (3rd story elements on the south east side) at the next discussion.

ZZZ-79. Would like to see the utility lines removed from the east side of Helena Avenue.

Public Hearing Comments, City Planning Commission Meeting, March 15, 2001

ZZZ-1. Please see response to comment letter F.

ZZZ-2. Please see response to comment letter G.

ZZZ-3. Please see response to comment letters C and H.

ZZZ-4. Please see response to comment letters B and E.

ZZZ-5. The comment presented does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-6. Appendix D has been revised to add detail on the camera and lens used to take the photosimulation base pictures. A digital camera with single lens reflex mechanism was used. The lens was set such that no there would be no magnification or reduction of the normal human view, equivalent to a 50-55 mm lens focal length (i.e., a "normal" lens for a 35 mm camera). Therefore, there is virtually no distortion of the human view depicted in the EIR photosimulations.

ZZZ-7. The comment presented does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-8. The comment presented does not specifically address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-9. Please see response to comment letter PPP.

ZZZ-10. Please see response to comment letters C and H.

ZZZ-11. The selection of the 19 different viewpoint used to illustrate potential project impacts on scenic public views is discussed in section 4.4.1., Photographic Simulations and View Angle Analysis. The viewpoints were selected to be representative of a reasonable range of visual conditions in the vicinity of the project. They were not selected to only illustrate the potential view blockage, but instead to provide a continuum of the visual experience a person might have when travelling west along Cabrillo Boulevard and the Waterfront, and up lower State Street. The potential growth inducement of the project is addressed in section 7.1. In terms of CEQA, the project would not result in extension of any major infrastructure, so no significant growth inducement impacts should occur. Future projects would be reviewed on a case-by-case basis. Your

comment regarding the Entrada project's "urban-canyon effect" will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-12. Please see response to comment letters A, D, and T.

ZZZ-13. Please see response to comment letter V.

ZZZ-14. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-15. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-16. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-17. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-18. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-19. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-20. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-21. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-22. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-23. The comment presented does not address specific inadequacies of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-24. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-25. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers for consideration during their review of the project.

ZZZ-26. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-27. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-28. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-29. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-30. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-31. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-32. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-33. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-34. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-35. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-36. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-37. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-38. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-39. Please see response to comment letter AA.

ZZZ-40. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-41. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-42. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-43. Please see response to comment letter B and E.

ZZZ-44. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-45. Please see response to comment letter NNN.

ZZZ-46. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-47. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-48. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-49. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-50. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-51. Please see response to comment letter X.

ZZZ-52. Please see response to comment letter TT.

ZZZ-53. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-54. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-55. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-56. The comment presented does not address the adequacy of the EIR analysis. The comment will be forwarded to the decisionmakers and will be considered during their review of the project.

ZZZ-57. The comment is noted.

ZZZ-58. The viewpoint location of View 1 is considered representative of the view from this location. Moving the viewpoint location would not result in a substantive change in the conclusions regarding the Entrada project's lack of significant impact on important public scenic views.

ZZZ-59. Inserting a section line through each photosimulation would not result in a substantive change in the conclusions regarding the Entrada project's lack of significant impact on important public scenic views.

ZZZ-60. A matrix summarizing the environmental impacts associated with important public scenic views is included in the Executive Summary and section 4.5.

ZZZ-61. The matrix described in response to comment ZZZ-60 provides the summary of the total project impact on important public scenic views. The extent to which each view represents a potential impact on these resources is presented after each

view analysis in section 4.4. No change has been made to this text so that the reader can understand the extent to which views would not be impacted from a continuum of viewpoints throughout the project area.

ZZZ-62. The comment is noted.

ZZZ-63. Open sky is not defined as an important visual resource in City plans and policies regarding view protection. It therefore is not relevant to address this aspect of a view in the CEQA analysis.

ZZZ-64. The comment is noted and supported by the EIR analysis.

ZZZ-65. No significantly adverse impacts on public views were identified in this EIR. Therefore, no project alternatives are required to minimize impacts on public scenic views. City decisionmakers may determine that additional project modifications are needed to find the proposal consistent with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and the City's Local Coastal Program policies. Please see the Executive Summary, Areas of Known Controversy and Issues to be Resolved.

ZZZ-66. The three-story Harbor View Hotel addition maximum height is 42 feet, similar to the proposed Entrada project new structures (i.e., not including the renovation of the Hotel Californian). The height of the hotel addition is shown in Figure 4-11, View 4., The project's contribution to cumulative impacts is discussed in section 4.6. The structure's framing was completed by the time the Entrada project NOP was released for public review, therefore making it part of the "existing setting" under CEQA.

ZZZ-67. The project's impacts on important public scenic views, according to the EIR thresholds of significance, would be adverse but less than significant. The project's consistency with adopted City plans and policies has been previously determined. Please see response to comment F-4.

ZZZ-68. The comment presented does not specifically address the adequacy of the EIR analysis.

ZZZ-69. Appendix D has been revised to add detail on the camera and lens used to take the photosimulation base pictures. A digital camera with single lens reflex mechanism was used. The lens was set such that no there would be no magnification or reduction of the normal human view, equivalent to a 50-55 mm lens focal length. Therefore, there is virtually no distortion of the human view depicted in the EIR photosimulations.

ZZZ-70. The comment is noted.

ZZZ-71. The comment is noted.

ZZZ-72. The comment is noted.

ZZZ-73. Removal of utility lines is required to be consistent with City LCP policies. It is not considered a mitigation measure in the EIR. Removal of utility lines is considered a beneficial impact where appropriate.

ZZZ-74. The comment is consistent with the EIR findings.

ZZZ-75. The City does not have a separately adopted threshold of significance for visual aesthetics. The evaluation criteria used in this focussed EIR are entirely consistent with those used in the adopted Mitigated Negative Declaration for the Entrada project. The EIR provided expanded explanation for greater clarification. The EIR evaluation criteria are intended to be consistent with guidance provided in CEQA Guidelines Section 15064 and Appendix G, Environmental Checklist Form. This consistency includes the following statements.

From Appendix G:

"Would the project:

a) Have a **substantial** adverse effect on a scenic vista?
b) **Substantially** damage scenic resources? and
c) **Substantially** degrade the existing visual character or quality of the site and its surroundings?
d) Create a new source of **substantial** light or glare which would adversely affect day or nighttime views in the area?" (emphasis added)

From this EIR:

The proposed project would represent a significant adverse impact to an important public scenic view if it would:

- Conflict with the applicable vista protection standards, scenic resource protection requirements, or design criteria of the City, or if it would alter or obstruct existing public viewsheds from or across the project site, including scenic features associated with designated scenic highways, by:
  - Substantially degrading an important public scenic view;
  - Substantially blocking an important public scenic view corridor; or

- Substantially impairing the visual context of the Waterfront area.

The evaluation criteria are also consistent with the City Initial Study checklist questions.

The analysis used in this EIR is qualitative in nature, with general criteria identified and descriptive explanation provided for factors and circumstances considered in applying the criteria in specific instances. Therefore, the comparison of important scenic views from the various representative viewpoints selected for analysis in the EIR is qualitative. The comment indicates that possibly a quantitative measure to determine significance is preferred. Inherent problems result with quantitative thresholds for view impacts in that any given percentage would not accurately reflect impact significance for the variety of individual circumstances.

There are a number of environmental impact categories including cultural resources, biological resources, and visual resources that are resistant to quantification because impact significance is based on a complex set of physical factors that may vary with the individual circumstances of each case. The State CEQA Guidelines recognizes this in Section 15064, as follows: "An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting."

ZZZ-76. The thresholds of significance used in this EIR do not give weight to the quality of the change to the existing setting; in other words, if the new development would be more attractive than the existing development. The description of the visual resources' existing setting appropriately includes the extent to which development has compromised the quality of the scenic visual resources experienced from viewpoints adjacent to the proposed Entrada site. Without this discussion, there is a lack of qualitative data used to weigh the relative value of the public scenic view. The project's impact on an important scenic view is independent from determining if the existing view is an important scenic view.

ZZZ-77. The comment is noted.

ZZZ-78. No significantly adverse impacts on public views were identified in this EIR. Therefore, no project alternatives are required to minimize impacts on public scenic views. City decisionmakers may determine that additional project modifications are needed to find the proposal consistent with the necessary Coastal Development Permit findings relating to consistency with the California Coastal Act and the City's Local Coastal Program policies. Please see the Executive Summary, Areas of Known Controversy and Issues to be Resolved.

ZZZ-79. The comment presented does not address the adequacy of the EIR analysis.

This page intentionally left blank.

APPENDIX G

Seismic Sea Wave (*Tsunami*) Potential

SEISMIC SEA WAVE (*TSUNAMI*) POTENTIAL

SANTA BARBARA CHANNEL
SANTA BARBARA COUNTY, CALIFORNIA

March 28, 2001

Submitted to

William Levy Investments
120 El Paseo
Santa Barbara, California

Prepared by

Michael F. Hoover Consulting Geologist-Hydrologist
800 Garden Street, Suite L
Santa Barbara, California 93101

MICHAEL F. HOOVER Consulting Geologist • Hydrologist

800 GARDEN STREET, SUITE L • SANTA BARBARA, CALIFORNIA 93101 • (805) 965-3045 - TELEFAX (805) 966-5661
email: Mhoover@Hoovergeo.com

March 28, 2001

William Levy Investments
120 El Paseo
Santa Barbara, CA 93101

Attn: Mr. Bill Medel

Subject: Seismic Sea Wave (*Tsunami*) Potential
Santa Barbara Channel
Santa Barbara County, California

Gentlemen:

EXECUTIVE SUMMARY

Tsunamis, or seismic sea waves, cause an average of nine (9) deaths worldwide per year and have the potential to cause hundreds of millions of dollars in property damage. Historically, two (2) significant *tsunamis* have occurred along the Santa Barbara coastline during the past 200 years. Neither caused significant damage to the harbor or downtown area, but due to a heightened level of development in the harbor, concerns about *tsunamis* exist today.

Three definitive investigations have been performed that predict both the magnitude and likelihood of occurrence of *tsunamis* that could potentially impact Santa Barbara. These studies predict a wave run-up that varies from 4 feet above mean sea level (MSL) to nearly twenty (20) feet above MSL. A return frequency of one hundred (100) years is estimated for the 4-foot wave; we estimate a return frequency of 500 to several thousands of years is estimated for the wave run-up to elevation 20. The elevation of the proposed Entrada de Santa Barbara (the project) is approximately 10 feet above MSL.

Two of the three studies (Corps of Engineers, 1974 and McCulloch, 1985) predict the impact on the Santa Barbara harbor from transoceanic (distantly generated) *tsunamis* but ignored

locally-generated *tsunamis*. The third study (California Office of Emergency Services, 2001) estimates the run-up from a worst-case *tsunami* (one that occurs simultaneously with storm surge and high tide), but does not evaluate the statistical likelihood of occurrence. Although the OES study may be useful for preparing worst-case evacuation plans, it is not particularly useful for land planning, since the assumptions used to prepare the OES map (i.e., a magnitude 7.0 earthquake, 100-year flood, and high tide all occurring simultaneously) exceed the design criteria for all development except nuclear facilities. The OES study recognizes these shortcomings, and in fact, states that the OES map is not applicable for land use planning (see http://newport.pmel.noaa.gov/time/mect/oakland.html, p. 2).

The USGS study (McColloch, 1985) indicates that waves up to 12 feet in height have historically occurred from locally generated *tsunamis* in the Santa Barbara Channel. One such wave occurred in 1812. McColloch suggests a 230-year recurrence for this type of locally generated wave. Other data (California Division of Mines & Geology, Table I) suggest a 380-year return period. Both data sources suggest that the recurrence interval of the 1812-type *tsunami* exceeds the 100-year design criteria established in the Uniform Building Code for non-critical structures, such as the Entrada commercial development.

In an effort to evaluate the size of a *tsunami* wave generated from a local earthquake likely to occur during the 100-year design life of the proposed Entrada project, we evaluated the local earthquake record and the statistical likelihood of future earthquakes centered in the Santa Barbara Channel. We also evaluated the relationship between submarine (*tsunamigenic*) faults and wave height. On the basis of our study, it appears that a locally generated earthquake with a reasonable (10%) chance of occurrence during the 100-year life of the proposed project would be four-and-a-half (4.5) feet in height. This figure is developed from Table I (attached) and relationships developed by McColloch between *tsunami* wave height and earthquake magnitude. If a 4.5-foot wave struck at an extremely high tide, the resulting 10.5-foot run-up may reach the project, but would not likely cause significant damage to the project or to inland waterfront area, since Cabrillo Boulevard and the project site are about 10 feet above mean sea level.

We also evaluated locally generated *tsunamis* that could occur as the result a maximum earthquake. A maximum earthquake would have a recurrence interval of 200 years or more in the Santa Barbara Channel and could result in a Magnitude 7.4 earthquake. The Magnitude 7.4 earthquake could cause a *tsunami* wave height of nine to twelve (9 - 12) feet, similar to the 1812 event. If this statistically unlikely earthquake did occur, the proposed project could experience minor flooding. If the maximum earthquake occurred at high tide it could cause significant flooding, however, it is unlikely that the proposed project would be destroyed due to the steel frame nature of the construction and the limited wave depth at the project site (about 2 to 8 feet). A catastrophe of this nature (maximum earthquake occurring at high tide) would likely have a recurrence frequency of approximately 600 years.

There have been allegations by members of the public (*Santa Barbara Newspress*, 12/30/00) that the narrowing of State Street could cause a constriction at one of the escape routes used during a *tsunami* evacuation of the waterfront. In that regard, it is important to note that distant *tsunamigenic* events result in relatively small (1 to 5.5 feet) waves in Santa Barbara, and lengthy warning times (usually hours). Thus ample time should be available to evacuate the waterfront prior to the arrival of a transoceanic *tsunami*. If a locally generated earthquake occurs that is large enough to generate a significant *tsunami,* the locally generated earthquake will likely cause collateral damage to roads, liquefaction, slope failures, bridge failures, and scattering of building debris on roadways. The collateral damage will likely be so extensive that evacuation by automobile from the harbor area would be impossible. It is therefore very important for the City to develop a *tsunami* evacuation plan prior to the advent of a *tsunami* that would direct harbor dwellers to walk to the stadium at City College (or other higher ground) before a *tsunami* struck the harbor.

INTRODUCTION

General

Tsunamis, defined by McColloch (1985) as seismic sea waves impulsively generated wave trains, have long caused damage to coastal communities. Most *tsunamis* are caused by submarine movement of the ocean floor on geologic fault lines, or by movement of submarine landslides. Some *tsunamis* are generated by aerial rock falls, volcanic eruptions, or large meteors that impact the oceans. This latter category can cause a *megatsunami*, and although extremely rare can result in catastrophic impacts to coastal areas.

Megatsunamis generated by sub-aerial events such as volcanic eruptions, meteors and rock fall generally occur too infrequently to be considered a significant risk to development. Likewise, submarine landslides are not generally considered a risk to development in the Santa Barbara Channel since waves generated by landslides are generally very small waves. In fact, McColloch (1985) concludes that "*tsunami* generated by slides of the dimensions known along the southern California coast pose no *tsunami* hazard." Synalokis (written communications, March 2001) indicates that new data indicates that submarine landslides may play a larger role in the generation of *tsunamis*, but no study (other than McColloch) has been performed in the Santa Barbara Channel that can be used to guide land planners.

Our investigation of Santa Barbara's *tsunami* hazard will therefore focus on transoceanic *tsunamis,* those *tsunamis* generated by a distant earthquakes, and locally-generated tsunamis caused by earthquakes occurring beneath the Santa Barbara Channel. The likelihood of occurrence and the magnitude of future *tsunamis* will be discussed herein. Please see Plate 1 for Project Location map.

INVESTIGATION

Previous Work

There are three definitive studies that evaluate the historical occurrence of *tsunamis* and which predict the magnitude and likelihood of occurrence of future *tsunamis* that could impact the California coast. The oldest (but still relevant) study was performed by the Corps of Engineers (Houston and Garcia, 1974). The Corps' study, performed for HUD insurance purposes, calculated ocean run-up due to seismic sea waves (of distant origin) at 15 coastal communities in California. The Corps' study ignored simultaneous storm surge (which is probably acceptable due to the low likelihood of concurrent storms and a major seismic event). Unfortunately the Corps' study also ignored *tsunamis* generated in the Cascadia Subduction Zone and local *tsunamigenic* events.

Run-up from a trans-oceanic *tsunami* was estimated by the Corps to be 5.5 feet for the 100-year event and 11.0 feet for the 500-year event (see Plate 2). An event (whether it is a flood, an earthquake or a *tsunami*) with a 100-year recurrence is commonly used for design and placement of non-critical structures such as dwellings and businesses; the 500-year *tsunami* is used as a basis of design for critical structures such as nuclear reactors, schools, and hospitals (McColloch, 1985).

McColloch, 1985 (in US Geological Survey Professional Paper 1360) evaluates the *tsunami* potential in the Los Angeles Region of California, which also includes Santa Barbara County. *Tsunami* generation, propagation, run-up and the historical *tsunami* record are discussed. McColloch adopts Inamura's *tsunami* magnitude classification system and relates *tsunami* magnitude to total energy, sea floor deformation, and Richter earthquake magnitude.

McColloch indicates that most of the world's major *tsunamis* are generated at plate boundaries along the margin of the Pacific Ocean where vertical displacements of the sea floor associated with dip-slip fault movements during a magnitude 7 or larger earthquake. It is acknowledged by McColloch, however, that locally generally *tsunamis* are a major factor in the Santa Barbara Channel, including the 1927 Magnitude 7.3 Point Arguello earthquake which caused a small *tsunami* (6 feet at Surf; 4.5 feet at Port San Luis, and not measured in Santa

Barbara) and the 1812 earthquake which caused a "runup of 10 to 12 feet at Gaviota and a smaller runup at Santa Barbara" (McColloch, 1985). The reason that the Santa Barbara Channel experiences locally generated *tsunamis* (whereas the Los Angeles-San Diego Region generally does not) is due to the presence of dip-slip faults in the Santa Barbara Channel that area capable of causing magnitude 7 or larger earthquakes. The preponderance of faults off the southern California coast are strike-slip, which are less likely to generate significant *tsunamis*.

McColloch also evaluated landslides off the southern and central California coast and found that they are not significant factors in generating *tsunamis*, primarily because only 1 to 2 percent of the potential (landslide) energy is converted to wave generation (Wiegel, 1970). Wave heights from submarine landslide movement in the Santa Barbara Channel are expected to be 3 feet or less according to McColloch and are not considered significant with respect to the subject project.

McColloch (1985) generates a series of strip maps for the Santa Barbara to San Diego coastline showing transoceanic wave heights in Santa Barbara in feet above mean sea level. Wave heights are generally considered to be run-up elevations except for low lying or estuarine areas or where waves encounter steep topography (McColloch, 1985, p. 399). The USGS study (McColloch) points out that the wave height, 4 feet in Santa Barbara, for the 100-year recurrence *tsunami* "does not presume coincidence of the highest *tsunami* wave with the peak high tide or with storm-induced high-water setup and superimposed storm waves." Nor are locally generated *tsunamis* considered. McColloch also cautions against using recurrence intervals as a statement of probability over specific time period. See Plate 3.

Office of Emergency Services

During a meeting dated February 17, 1998, the State Office of Emergency Services (OES) directed Dr. Costas Synolakis to prepare worst-case scenario *tsunami* inundation maps. A finite difference model developed by Vasily Titov and Synolakis was used to produce the map. Unfortunately OES only used the worst case scenario (high tide, high storm surge and maximum

credible earthquake for making their *tsunami* hazard map (see Plate 4). The return frequency for the OES-type event is 500 to 1000 years (see Appendix). Thus, the OES *tsunami* hazard map is not applicable for land use purposes due to the unlikely nature of all three events occurring simultaneously; a disclaimer stating same is included on the map. The OES map also neglects the buffering effects of buildings, making them more conservative. It is interesting to note that a comment was made in the OES meeting to the effect that vertical evacuation may be a possibility if buildings were steel moment (i.e., not wood frame). See http://newport.pmel.noaa.gov/time/mect/oakland.html.

Analysis of Locally-Generated *Tsunamigenic* Event

Weaver (1966) developed a structural map of the Santa Barbara Channel which differentiates between strike-slip and dip-slip faults. Weaver's map (Plate 5) is similar to but is more detailed than Jennings (CDMG, 1994), a commonly cited reference. Rather than differentiate between strike-slip faults (which are less likely to cause *tsunamis*), we evaluated the seismic history of the entire region taking into consideration both strike-slip and dip-slip faults. In an effort to evaluate *tsunamigenic* events in the Santa Barbara Channel, we evaluated the seismic history of an area within latitude 34°W to 121°W. We evaluated both the maximum credible event and the largest seismic activity with a ten percent (10%) likelihood of occurrence in the next 100 years. We also evaluated the likelihood of occurrence of a magnitude 7-earthquake on the offshore extensions of the Oak Ridge and Pitas Point faults, the most likely source(s) of the 1812 *tsunami.* Our analysis is presented on Table I. Our evaluation determined that the maximum earthquake in the Santa Barbara Channel is a Magnitude 7.4. The maximum earthquake has a return frequency of 200 years, which is in excess of design requirements for a commercial project. An event that could occur during the life of the project (90% chance of occurrence in 100 years) is a Magnitude 7.0 earthquake. The latter event should be used for evaluation of residential and commercial design such as the one the application proposes. Using McColloch (1985), it can be calculated that run-up of 4.5-foot could be occur from a seismic event likely to occurring during the 100-year design life of a commercial project.

We also evaluated the return frequency of the OES inundation map. The reader will recall that OES predicts a worst-case run-up of 8 feet at the proposed project site. We concluded that the return frequency of the worst-case *tsunami* occurring simultaneously with a storm surge and high tide is 6,000 years. This conclusion is based on a ten-year flood event, a twenty-five percent (25%) occurrence of a high tide, and a 200-year recurrence interval of a *tsunamigenic* event like the 1812 earthquake.

CONCLUSION

Analysis of *tsunami* run-up related to a **transoceanic** event already exists (Houston and Garcia, 1974; McColloch, et al., 1985). These studies conclude that the 100-year transoceanic *tsunami* event will cause a wave run-up of 4 to 5.5 feet in Santa Barbara (100-year event) which will not impact the proposed project, even if the *tsunami* occurs at high tide. McColloch (1985) suggests that submarine landslides are not a factor in *tsunami* generation. Likewise, subaerial events such as volcanic eruptions (submarine), meteors and rock falls are not likely to cause a *tsunamigenic* event during the design life of the project.

During the course of our investigation we evaluated the likelihood of occurrence of a **locally generated** *tsunami* similar to the 1812 *tsunami* that reportedly caused a 10- to 12-foot seismic sea wave at Gaviota. Our analysis concludes that the Oak Ridge/Pitas Point fault and other fault systems present beneath the Channel are capable of magnitude 7.0 to magnitude 7.4 earthquakes, which may result in 4.5- to 12-foot *tsunamis*. The recurrence interval of such events is approximately 100 to 200 years, respectively. An 1812-type *tsunami*, 10- to 12-feet in height, would impact the low lying areas of Santa Barbara, but would not significantly impact the proposed project unless it occurred at a high tide or during a storm surge (flood). The recurrence of a Magnitude 7.5 earthquake on the Oak Ridge, Pitas Point fault or North Channel faults concurrent with a high tide is approximately 600 years. If a storm surge is also added into the mix, the recurrence interval increases to 6,000 years.

The *tsunamigenic* event most likely to impact the proposed Entrada project is a local Magnitude 7.0 earthquake that would result in a 4.5-foot wave. This wave would not significantly affect the proposed project, even if it occurred at high tide, since the project is located 10+ feet above mean sea level.

With respect to evacuation, there would likely be hours of warning before a transoceanic *tsunami* struck, thus evacuation could likely occur in an orderly manner. A locally generated *tsunami* would follow a locally-generated earthquake and would only allow a few minutes for evacuation. Due to the collateral damage to roads and infrastructure that would occur as the result of a locally-generated earthquake, evacuation by foot to nearby high ground is recommended.

Sincerely,

MICHAEL F. HOOVER CONSULTING GEOLOGIST-HYDROLOGIST

Michael F. Hoover

Michael F. Hoover
Principal Geologist

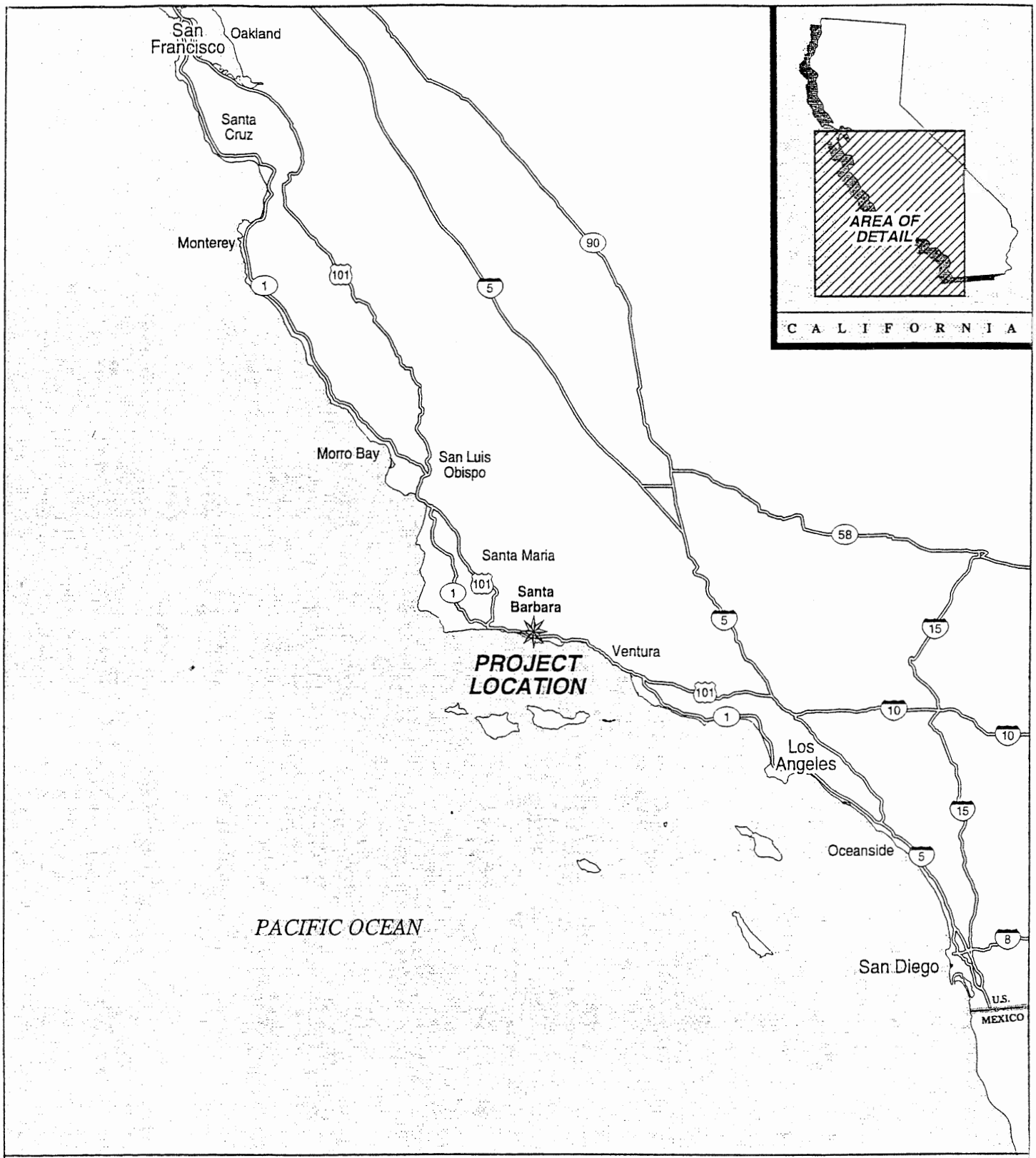
TABLE I

Maximum and 100-year Earthquake for Santa Barbara Channel

Reference: Peterson, M., et al., 1996, *Probabilistic Seismic Hazard Assessment for the State of California*, CDMG Open File Report 96-08

Fault	**Maximum Earthquake**	**Return Period** (Year)	**100 Year Earthquake**
San Gregorio/Hosgri	7.3	400	6.7
Red Mountain	6.8	1110	5.6
Anacapa Island	7.3	530	6.6
Channel Island Thrust	7.4	1420	5.8
Montalvo/Oak Ridge Trend	6.6	730	5.7
North Channel	7.1	600	6.3
Oak Ridge	6.9	380	6.3
Santa Cruz Island	6.8	910	6.3
Santa Rosa Island	6.9	1130	5.8
Malibu Coast	6.7	2910	5.2
All faults in Santa Barbara Channel	7.4	200	7.0

* Estimates based on regional seismicity, probability functions, activity rate and Richter formulae.



REGIONAL LOCATION MAP
LA ENTRADA PROJECT
SANTA BARBARA, CALIFORNIA

N

SCALE IN MILES

0 50 100

MICHAEL F. HOOVER
Consulting Geologist • Hydrologist

By DAS Date 3-20-01

Plate 1

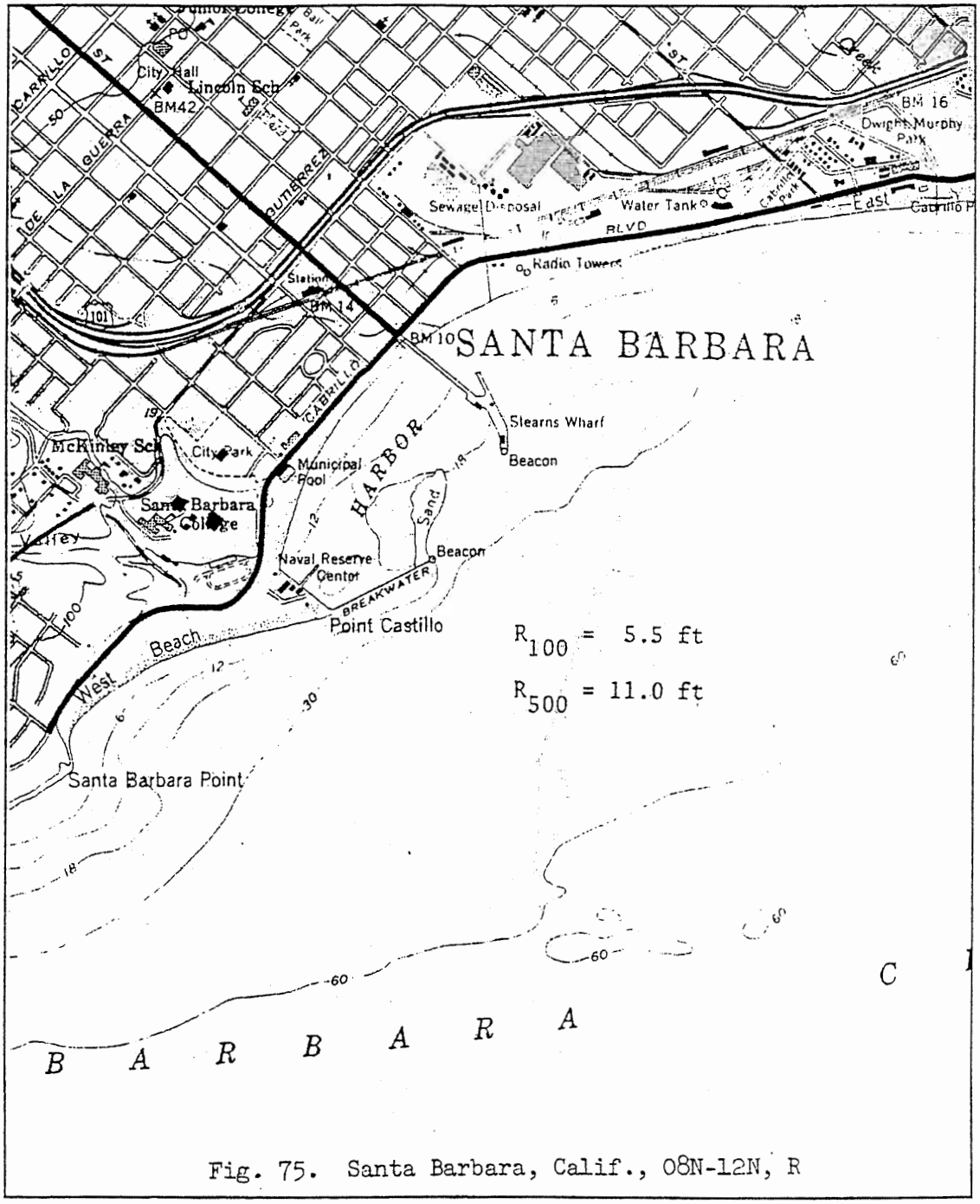


Fig. 75. Santa Barbara, Calif., 08N-12N, R

PREDICTED TSUNAMI RUNUP

Houston and Garcia 1974

By DAS Date 3-20-01

MICHAEL F. HOOVER
Consulting Geologist • Hydrologist

Plate 2

By DAS Date 3-20-01

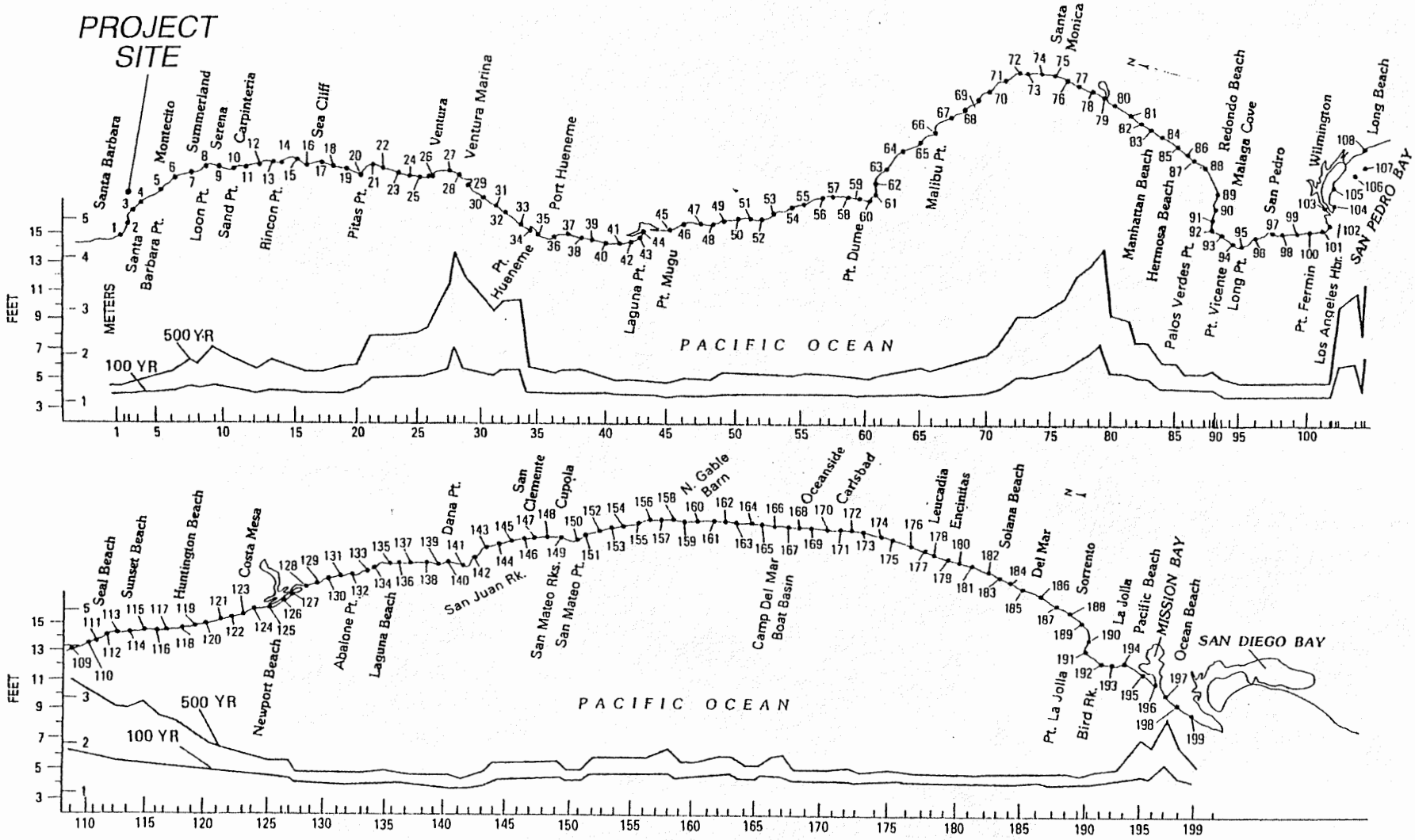
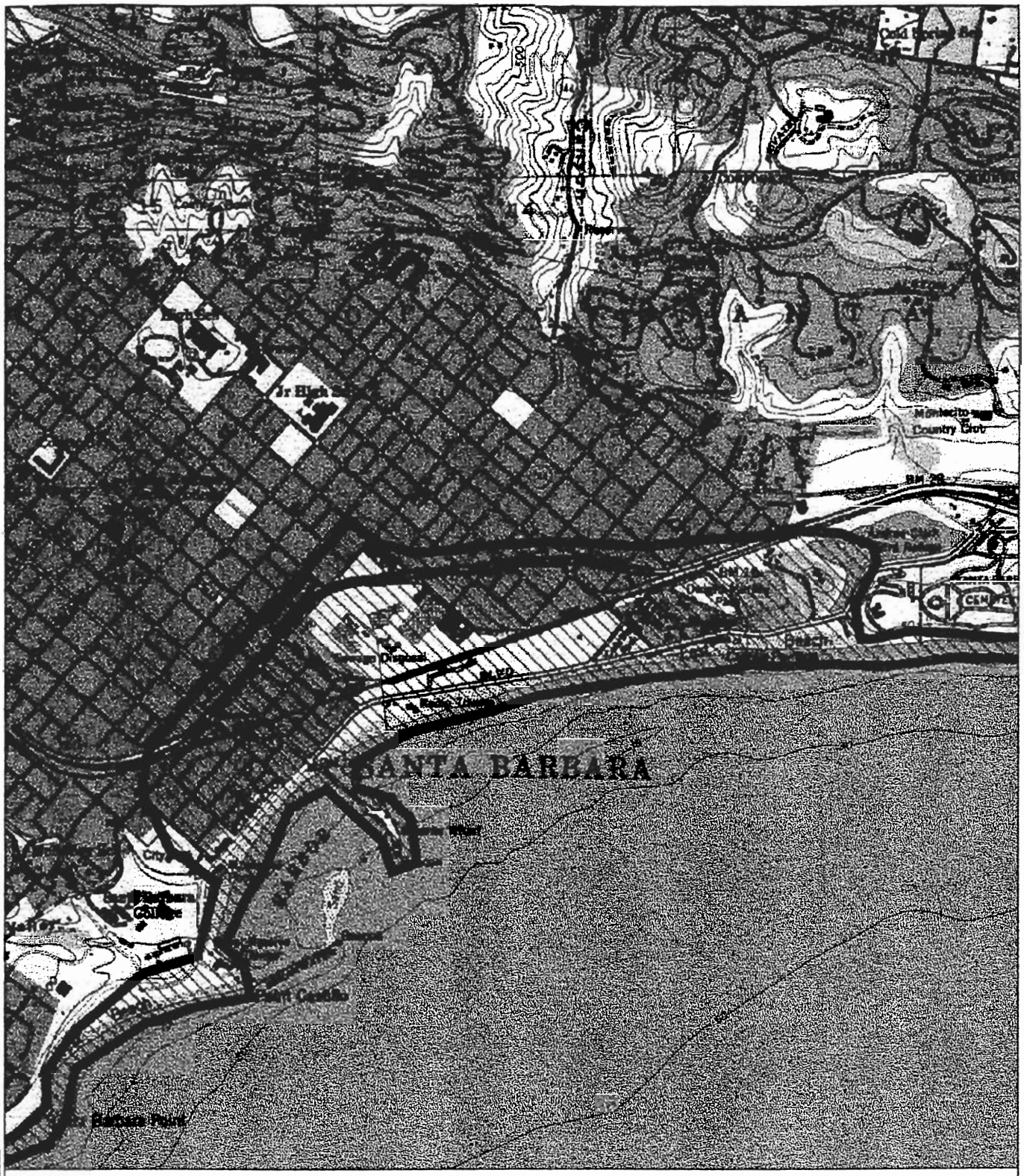


FIGURE 208.—Heights of the 100- and 500-yr tsunamis along the southern California coast (Santa Barbara to San Diego) as predicted by numerically modeled tsunamis. Modified from Houston (1980). Wave heights given for each numbered coastal location are the values predicted as the wave crosses the shoreline and include the effects of astronomical tides. Runup elevations may be higher where waves encounter steep topography at or near the shoreline or lower where waves flood low-lying or estuarine areas.

PREDICTED TSUNAMI RUNUP

USGS (McCulloch) 1985

MICHAEL F. HOOVER
Consulting Geologist • Hydrologist



PREDICTED TSUNAMI RUNUP

OES, 2000

N

SCALE IN MILES

0 0.5 1

MICHAEL F. HOOVER
Consulting Geologist • Hydrologist

By DAS Date 3-20-01

Plate 4

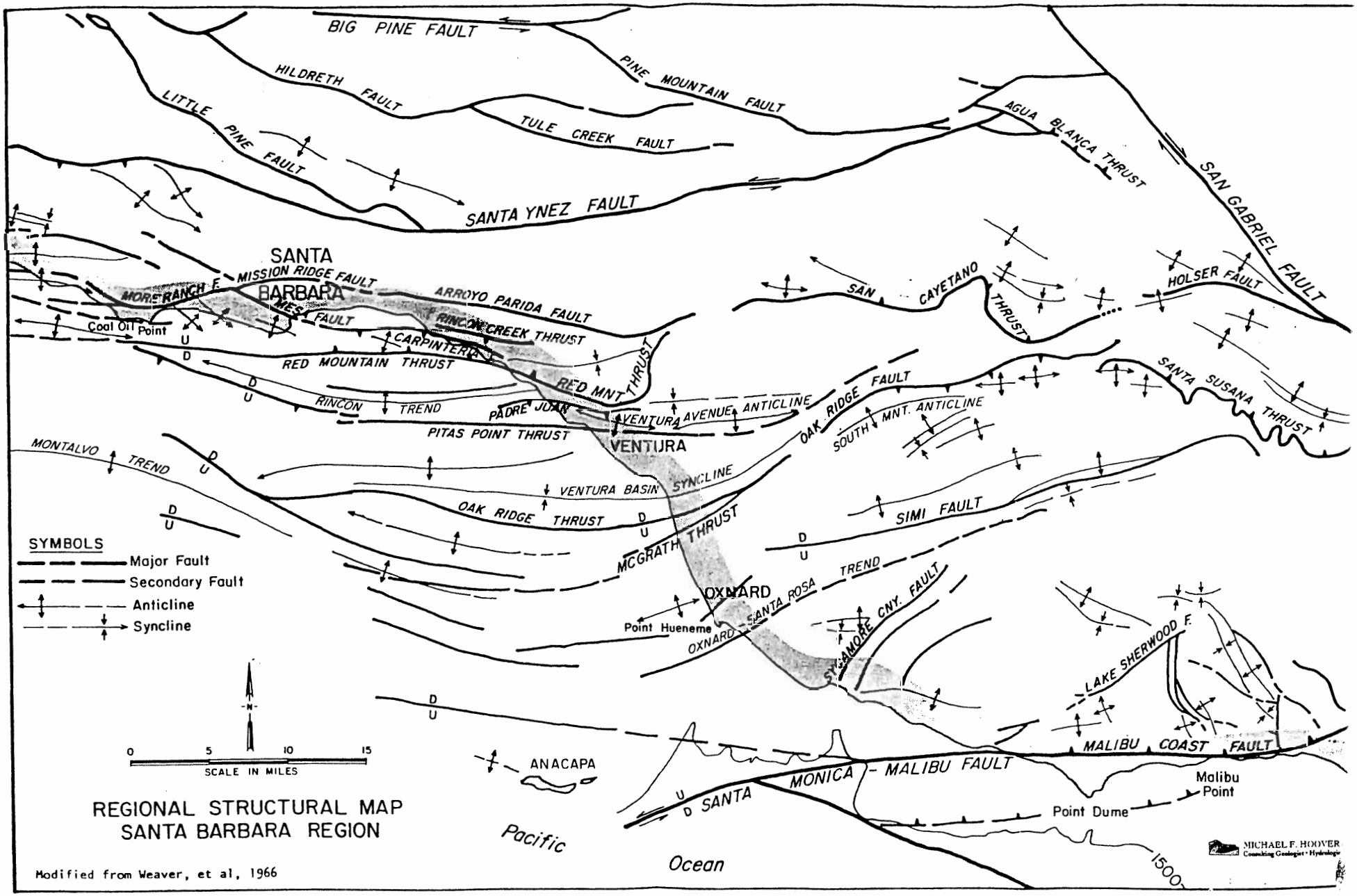
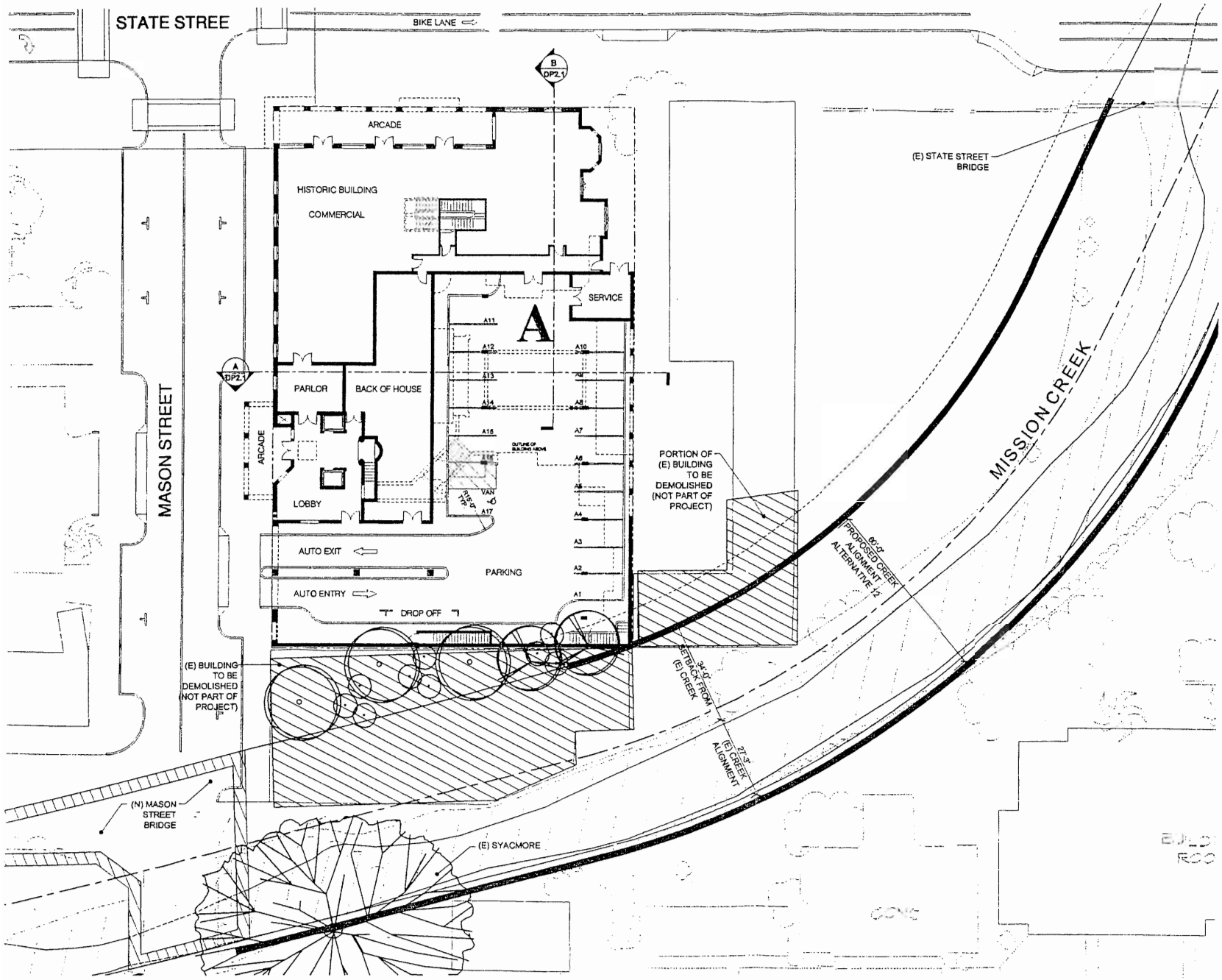

BIG PINE FAULT
HILDRETH FAULT
PINE MOUNTAIN FAULT
LITTLE PINE FAULT
TULE CREEK FAULT
AGUA BLANCA THRUST
SAN GABRIEL FAULT
SANTA YNEZ FAULT
SANTA BARBARA
MISSION RIDGE FAULT
MORE RANCH F.
MESA FAULT
ARROYO PARIDA FAULT
RINCON CREEK THRUST
Coal Oil Point
CARPINTERIA
RED MOUNTAIN THRUST
RED MNT THRUST
SAN CAYETANO THRUST
HOLSER FAULT
RINCON TREND
PADRE JUAN
VENTURA AVENUE ANTICLINE
OAK RIDGE FAULT
SOUTH MNT. ANTICLINE
SANTA SUSANA THRUST
PITAS POINT THRUST
VENTURA
MONTALVO TREND
VENTURA BASIN SYNCLINE
OAK RIDGE THRUST
SIMI FAULT
MCGRATH THRUST
OXNARD
SANTA ROSA TREND
SYCAMORE CNY. FAULT
Point Hueneme
OXNARD
LAKE SHERWOOD F.
MALIBU COAST FAULT
ANACAPA
SANTA MONICA
MALIBU FAULT
Malibu Point
Point Dume
Pacific Ocean
1500
SYMBOLS
Major Fault
Secondary Fault
Anticline
Syncline
N
0 5 10 15
SCALE IN MILES
REGIONAL STRUCTURAL MAP
SANTA BARBARA REGION
Modified from Weaver, et al, 1966
MICHAEL F. HOOVER
Consulting Geologist • Hydrologist

Plate 5

APPENDIX H

Lower Mission Creek Flood Control Project
Feasibility Report, Alternative 12



ENT. .DA de SANTA BARBARA

A Revitalization Proposal

AREA A ALTERNATIVE 12 MISSION CREEK ALIGNMENT

1" = 30' SCALE

north

3/3/00

7160509

B3 ARCHITECTS

A BERKUS DESIGN STUDIO