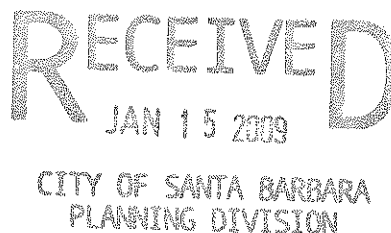


MARY LOUISE DAYS
Historian
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Santa Barbara, California 93105
(805) 687-2957
January 15, 2009

Ms. Kathy Kennedy
Planning Division
Community Development Department
630 Garden Street
Santa Barbara, California 93101



SUBJECT: Comments re Draft Mitigated Negative Declaration, El Encanto Hotel
Master Plan Revision, 1900 Lasuen Road, Santa Barbara

Dear Ms. Kennedy,

As a registered professional historian I am representing individuals who live across the street from the El Encanto Hotel. I received degrees in history, with highest honors, from Santa Barbara City College and from the University of California, Santa Barbara. My minor was in architectural history. As an employee of the City of Santa Barbara I served for many years as City historian and staff to the Historic Landmarks Commission and Planning Department/Division. I have served on the boards of several local and statewide historic preservation-related organizations. My publications include materials on local history, and I often speak on historical topics.

A portion of my comments have to do with the subject draft document's lack of a description and analysis of the cultural landscape of El Encanto--its civic, horticultural, historical, and design importance. This is a significant feature and it should be recognized by the City's draft environmental review document.

In December 2002 a Historic Structures/Sites Report for El Encanto Hotel was submitted to the City of Santa Barbara by Preservation Planning Associates. It had been prepared for Friden Hotel Company, who then owned the hotel property. The final report was accepted by the Historic Landmarks Commission on January 8, 2003.

Page 9 of the Site and Building History section of the report includes a description of the site landscape design that had been created by Charles Frederick Eaton. Subsequent pages refer to the frequent praise given to the hotel's grounds and landscape. The significance of this is set forth on page 51 of the December 2002 report. Many of the features continued to enchant visitors and guests up to the recent closing of the hotel.

The MND's analysis of the landscape setting and design is inadequate in that the landscape is not mentioned in the Aesthetics section. Project on-site visual aesthetics and compatibility with the surrounding area (see the "Issues" introduction to Aesthetics) could be affected by components of the revised plan. The analysis recommends no mitigation measures.

Under Biological Resources the recommended mitigation measure regarding the historically significant eucalyptus trees in the northwest portion of the hotel property does not specify required qualifications for "an arborist." In addition, we recommend that the qualified arborist's draft report be reviewed and approved by the landscape architect member of the Historic Landmarks Commission. It should then become a part of an Environmental Impact Report. Professional analysis of the trees should be included in the EIR to advise in decisions on the proposed revised project.

Further comments have to do with the MND's analysis of Cultural Resources, the major section relating to archaeological resources, historic resources, and ethnic/religious resources. The historic resources issue includes the built environment--architecture and other built features. The Cultural Resources section matrix is correct in that it gives a "Potentially Significant" level of significance to item 4 b), which refers to a "historic structure or site designated or eligible for designation as a National, State or City landmark." However, the MND analysis of this item is incomplete because it states only that the hotel site is a Structure of Merit. While it is true that the hotel was designated a City Structure of Merit in 1998, it is also true that the abovementioned December 2002 Historic Structures Report determined the eligibility of certain structures on the property for designation as City Landmarks. Pages 55 through 58 stipulate a category of "Landmark," "Structure of Merit," or "Non-contributing" for each structure. The landscape elements known as the pergola, pond, rockery and wishing well are found eligible to be Landmarks. Thirteen structures were found eligible to be Landmarks. The MND should provide this information. It could be considered relevant to mention that the Landmark designations are on the work program of the HLC's Designations Subcommittee, as indeed they must be, given the activity at the site.

Main Building 1 was considered eligible to be a Structure of Merit—the category given the entire property in 1998. This main building has been demolished and a new building is under construction. We have been unable to find a minutes record of HLC action to approve an application for this demolition, as required by Section 22.22.090 of the Municipal Code, amended in 2004.

The 2002 report, pages 58 and 59, found that El Encanto is "eligible for listing at the local level as a district in the California Register of Historic Resources." It also found El Encanto eligible for the National Register of Historic Places "at the local level as a district containing both contributing and non-contributing buildings." This information is not included in the Historic Resources section of the MND.

The significance of the site and the substantial nature of the project's impacts, including demolition, alteration, and a complete remake of the site are the bases of a potential significant impact, and an Environmental Impact Report is required.

There is a long list of project applications submitted by the current owners of El Encanto Hotel. Many of them involve changes to their original project, such as the proposed revisions to the 2004 Master Plan. It is obvious that there could be cumulative significant adverse impacts resulting from these revisions, based on the several plan changes and additional studies. How many of these changes could affect the historic landscape and buildings? The spatial relationship of the entire El Encanto Hotel site is a significant part of its cultural and visual importance to the community, state and nation. This relationship should be preserved, not interrupted by new or relocated structures. There could easily be incremental loss of the historic spaces and features. The environmental document must address the potential cumulative effects.

El Encanto Hotel and its surroundings are extremely important elements of the Riviera neighborhood. The City's analysis of the project's potential environmental impacts must be wide-ranging and complete. Preparation of a Negative Declaration is not sufficient.

Sincerely,

A handwritten signature in cursive script that reads "Mary Louise Days". The signature is written in black ink and is positioned above the typed name.

MARY LOUISE DAYS
Historian