



City of Santa Barbara
Planning Division

Memorandum

DATE: June 30, 2016

TO: Planning Commission

FROM: Beatriz Gularte, ^{BEG} Senior Planner I
Irma Unzueta, Project Planner
David Eng, Planning Technician II

SUBJECT: Request for Planning Commission Comments Regarding an AUD Mixed-Use Project at 1032 Santa Barbra Street. MST2016-00071

Project Description

The project consists of a proposal by DesignARC Architects, agent for David P. Meyers, property owner, for a new mixed-use project using the Average Unit-Size Density (AUD) Incentive Program with a density of 45 dwelling units per acre (du/ac). The project is proposed on two C-2, Commercial zoned lots totaling 7,908 square feet located in the City's Central Business District (CBD). The project is proposed as a three-story building, with eight residential units and 1,369 square feet of nonresidential development, with 11 covered parking garage spaces and 8 covered bicycle spaces. The units will include 7 two-bedroom units and one studio with an average unit size of 959 square feet. Existing on the site are a one-story office building and a one-story single-family residence that will be demolished. The proposal includes a voluntary lot merger of the two parcels (Attachments 1 & 2). The applicant has proposed the residential units as rentals and would be required to record a condition against the title requiring the residential units to remain as rentals for as long as the project site is developed under the AUD.

Two zoning modifications are required for the project as proposed, including a front setback modification to allow less than the required five-foot variable setback on the Santa Barbara Street frontage and an outdoor living space modification to allow an enclosed mirador balcony to count toward the private outdoor living space requirement for the proposed studio unit. A separate public hearing before the Staff Hearing Officer (SHO) will be required to consider the modification requests.

Discussion

Section 28.20.080 of the Santa Barbara Municipal Code (SBMC) requires AUD rental projects proposed on lots of 15,000 square feet or greater of lot area and located in the High Density or Priority Housing Overlay areas to receive Planning Commission review and comment before the project is considered for Project Design Approval by the Architectural Board of Review (ABR) or the Historic Landmarks Commission (HLC).

Since the proposed project site only has 7,497 square feet of lot area, Planning Commission review is not required pursuant to SBMC § 28.20.080. However, SBMC §22.22.133 grants the HLC the ability to refer a project to the Planning Commission prior to granting project design approval when the HLC determines that a development is proposed for a site which is highly visible to the general public. SBMC §22.22.133 reads as follows:

“When the Historic Landmarks Commission determines that a development is proposed for a site which is highly visible to the general public, the Historic Landmarks Commission may, prior to granting project design approval of the application, require presentation of the application to the Planning Commission solely for the purpose of obtaining comments from the Planning Commission regarding the application for use by the Historic Landmarks Commission in its deliberations.”

On April 20, 2016, the HLC reviewed the proposed project for the first time as a Pre-Application Concept Review. As part of their review, the majority of the HLC expressed concern regarding the AUD Program and the negative impact it is having on the City. The HLC’s review of the proposed conceptual design was generally positive, finding the architecture exemplary and in keeping with HLC guidelines; however, it had specific design compatibility questions relating to the highly visible location and the following design and land use concerns:

1. Parking appears inadequate for this site.
2. Interior setbacks providing light and air to the residential units appear inadequate.
3. The density appears to be incompatible with the neighborhood.
4. The Commission questions whether adequate support services exist for this density of development in the neighborhood.

The HLC voted 6/0/0 to refer the project design to the Planning Commission per SBMC §22.22.133 (Attachment 3) for the sole purpose of obtaining comments focused on the above concerns which were primarily identified by neighbors of the project. The Planning Commission’s comments will be forwarded to the HLC and will be considered as part of their subsequent reviews and action.

Additionally, during its conceptual review of the project and prior to review of the zoning modifications by the SHO, the HLC will consider project compatibility criteria specified in SBMC §22.22.145B and provide pertinent comments to the SHO (Attachment 4). The HLC will once again consider the project compatibility criteria at the time of approval or disapproval of the project. The criteria is intended to promote consistency between the land use and design review process, as well as show appropriate concern for preserving the historic character of certain areas in the City.

Issue Areas

Parking

The HLC expressed concern that the proposed number of parking spaces for the project appear inadequate for the site and may result in adverse parking impacts to the neighborhood. The AUD Program Ordinance (SBMC §28.20.070) allows a minimum of one covered or uncovered parking space for each unit, with no guest parking requirement. The project proposes one space for each unit, which meets the minimum requirement of the AUD Program. Additionally, the Zoning Ordinance establishes a requirement of 1 parking space per 500 square feet of nonresidential development for properties in the Central Business District (CBD). The proposed 1,369 square feet of office space requires 3 parking spaces. The project proposes 11 parking spaces (8 residential parking spaces and 3 commercial parking spaces), therefore, meeting the zoning parking requirements (Attachment 5).

Interior Setbacks

Another concern expressed by the HLC is that the interior setbacks are insufficient to provide adequate light and air to the residential units and requested that additional interior yard setbacks be provided. The project is located in the C-2, Commercial zone and per the AUD Ordinance, (SBMC §28.20.070.D1.b. Additional Development Incentives), interior yard setbacks are not required when adjacent to a nonresidential zone. Proposed Interior setbacks range from no setback to 12" on the ground level, with portions of the upper levels setback between 2' and 6'. Therefore as proposed, the project complies with the zero interior setback requirement of the AUD Program.

Density

The HLC expressed concern that the project density is incompatible with the neighborhood. However, the HLC did not indicate specific concern with the size, bulk and scale of the project which many times is directly connected with the project's density. Only one Commissioner indicated a preference for a reduction in the number of units. The AUD Program allows a density range of 37-63 dwelling units per acre for projects developed in the Priority Housing Overlay areas of the City. The proposed density for the project is 45 du/ac, which is within the density range allowed by the AUD Program.

Recent multi-unit and/or mixed use projects approved in and around the Downtown area by both the HLC and ABR are provided in Attachment 6 to give the Planning Commission a perspective of approved residential densities in the area compared to the proposed project.

Proximity to Support Services

The HLC questioned whether adequate support services exist in the neighborhood for the proposed density of the project. Specifically, the Commission was concerned with the lack of grocery stores in the area and the possible inadequate water and sewer service. The project site is located in the CBD and is in close proximity to Downtown, transit, and commercial services, areas selected for High Density and Priority Housing Overlay densities. Thus, the proposed project is centrally located to employment, shopping, and

recreation. The project site is approximately four blocks from the Ralph's grocery store at Carrillo and Chapala Streets and adequately served by City water and sewer.

Zoning Modifications

Front Setback

A five-foot variable front setback is required for all stories of the proposed project. The project does not meet the five-foot variable setback on Santa Barbara Street due to the encroachment of the mirador balcony proposed on the second floor of the building. The project requires a setback modification from the Staff Hearing Officer to allow less than the required five-foot variable setback on Santa Barbara Street. Planning staff has indicated initial support for this modification based on site constraints due to the adjacent building being constructed over the property line and encroaching into the subject parcel's front setback. Also, the ground level of the building meets the variable setback requirement.

Outdoor Living Space

The mirador balcony is proposed as the private outdoor living space for the studio unit. The zoning ordinance requires this space to be a minimum of 60 square feet, with minimum dimensions of 6 feet, measured in perpendicular directions. Although the mirador balcony is proposed to be 60 square feet with a minimum 6 foot dimension, it does not qualify as private outdoor living space because it is enclosed. The zoning ordinance requires all open yard areas to be open and unobstructed in order to provide light and air to the residential unit. The HLC found the mirador balcony to be a nice architectural feature for the project and supports the concept of it being counted as the private outdoor living space for the studio. At this time, staff is reluctant to support this modification to allow the enclosed mirador balcony as private outdoor living space, as no other open space is provided for the studio unit.

Recommendation

Staff recommends that the Planning Commission comment on the four areas of design concern expressed by the HLC and outlined in this Memorandum. The Planning Commission's comments and recommendations will be forwarded to the HLC for use in deliberations on the project prior to their granting project design approval. While Planning Commission comments to the SHO are not required for this project, any comments addressing the modifications will be forwarded to the SHO for consideration.

Attachments:

1. Project Plans
2. Applicant's letter received May, 26, 2016
3. Historic Landmarks Commission Minutes, April 20, 2016
4. Project Compatibility Analysis (SBMC §22.22.145)
5. Site and Zoning Information Table
6. Project Density Comparison Table



City of Santa Barbara California

Attachment 1: The site plan for 1032 Santa Barbara Street has been distributed separately.

A copy of the plans is available for viewing at the Planning and Zoning Counter, 630 Garden Street, Santa Barbara, CA between the hours of 8:30 A.M and 4:30 P.M. Monday through Thursday, and every other Friday. Please check the City Calendar at www.SantaBarbaraCA.gov to verify closure dates.

1032 Santa Barbara Street, LLC

1032 Santa Barbara Street
Santa Barbara, CA 93101

City Planning Commission
735 Anacapa Street
Santa Barbara, CA 93101

Dear Commissioners:

This letter is in support of 1032 Santa Barbara Street, LLC's application regarding the project located at 1032 Santa Barbara Street and 208 East Figueroa Street (Case No. MST2016-00071) pending before the Planning Commission. As discussed below, we are working to implement the recommendations made by members of the Historic Landmark Commission ("HLC"). I believe that all of the concerns raised by the HLC can be addressed by either the HLC themselves or by the planning staff, but remain convinced that the deferral to the Planning Commission was not necessary and not permitted under the Municipal Code.

The HLC Board provided overwhelmingly positive comments on the character of the design, going as far as stating the "architecture is exemplary and an asset to the HLC," however, they did voice some concerns related to parking, density, and utilities. Furthermore, it was also nice to hear that the mass, size and scale of the project was consistent with the other buildings in the neighborhood. In addition, they supported a modification to permit the Mirador Balcony to protrude into the variable setback without a compensation area. It should be noted that there was no discussion that the proposed mixed-use was inappropriate for the area.

1. *The HLC's Deferral To The Planning Commission Seems To Have Been Political In Nature And Shows A General Opposition To The AUD Program*

While we respect the decisions of the HLC, we believe that critical information regarding the project's impact on these specific areas was not accurately addressed during the meeting, and this letter hopes to address these concerns. As a preliminary matter related to the referral to the Planning Commission, I believe that the Planning Commission's review should be limited

to whether the project's "use" is appropriate for the area.

I am also concerned as to the comments that the various HLC members made regarding the AUD program itself as well as the deferral of the project to the Planning Commission. It is clear that certain members of the HLC are politically opposed to the City Council's decision to implement the AUD program in the first place. After repeated criticisms of the AUD program, which was admittedly political, the HLC voted to refer the project to the Planning Commission to address issues (namely parking and density) that are specifically permitted for under the AUD program itself.

2. *The Project Strictly Follows The AUD Guidelines With Respect To Density And Parking*

As for the concerns of certain HLC members related to the density of the project as a result of being in the Priority Housing Overlay, the project could have up to ten (10) units as opposed to the eight (8) contemplated in the development. A corresponding issue was the fact that the development provides for one parking space for each AUD unit. Both the density and the parking ratio are expressly provided for under the AUD program. Not only is the Planning Commission review of density and parking not an appropriate matter for review on this project as it is not a "use" issue, it is clear by a plain reading of the AUD program itself that both of these issues have been permitted by the City Council when they approved the AUD program originally.

As a practical issue, the issue of parking can be addressed with not only on-site parking, but also the use of off-site parking, residential permitted parking, both city and private lots, as well an effort to actively market the units to individuals with only one car. As it relates to the commercial use of the project, the project is located in the City's Zone of Benefit in light of the fact that there are three city lots located within a quarter mile of the project that guests and employees could use to park during the day.

For residents, they will be permitted to park on both Figueroa Street and Garden Street by permit for residents in the area. In talking with the current tenant at 208 East Figueroa, who has lived in the neighborhood for over thirty years, there is ample parking along Figueroa Street and Garden Street for those individuals that have been issued a resident permit. Also, there is overnight

parking on Santa Barbara Street which would only prohibit parking from 10:15 am until 4:45 pm (this assumes they use the full 75 minutes of free parking). Accordingly, if a renter had a normal nine-to-five job, they would be able to park their vehicle along Santa Barbara Street five days a week in an alternating fashion with their work schedule.

3. *The Project Goes Above And Beyond What Is Required By The AUD Guidelines With Respect Setbacks*

Mr. & Mrs. Kornwall, a couple who live next door to the project parcel, voiced concerns about the impact of the project on their living room view of Courthouse. Both Mark Shields and I have reached out to Mrs. Kornwall on different occasions to hear her concerns and assure her that we are working towards a solution that preserves this view.

As it relates to the setbacks of the development, it is important to note that this project is being built in a C-2 zone. Prior to the implementation of the AUD, and currently, if a developer wanted to develop a mixed-use project or a nonresidential commercial project, the projects would have a zero setback along the entire property line (including the front property line). This was obviously true when Mr. and Mrs. Kornwall made the decision to build a solely residential project in their restricted office zone.

As this project includes the owner's law firm, it is clear that at no point will this property be developed solely for residential purposes. Accordingly, the AUD's setbacks are actually more stringent on the developer than if the property was developed as either mixed use or non-residential commercial which permit zero lot line development. Accordingly, as it relates to the neighbors that made a public comment, the proposed AUD development provides up to six feet of additional air and light than if the development was being developed as either a mixed use or non-residential commercial project.

While the AUD explicitly provides that no interior setback be required, we have provided a set-back along Figueroa Street for residential neighbors on the second and third floor that ranges between five and twelve feet. As a solely residential project, they will have a six and ten foot setback from the property line. In fact, the 210 Figueroa Street development shares a property line with 1026 Santa Barbara Street which is a cinder block building built at a zero lot line.

Therefore, the proposed development's variable setbacks are permissible under the AUD and far more desirable what could be built on the lot.

4. *There Is No Evidence Of Any Issues Regarding Support Services*

As to the general concerns regarding support services related to sewer, water, and social infrastructure, this issue is clearly a question for public works and the General Plan. There is no evidence that the project is not in compliance with any zoning ordinances or AUD guidelines in these respects, with concerns based solely off of speculation.

5. *Conclusion*

Based on the foregoing, the Project fully complies with the AUD and should be approved.

A handwritten signature in black ink, appearing to read "David P. Myers". The signature is fluid and cursive, with a long horizontal stroke at the end.

David P. Myers
1032 Santa Barbara Street, LLC
1032 Santa Barbara Street
Santa Barbara, CA 93101

PRE-APPLICATION CONCEPT REVIEW - NEW ITEM: PUBLIC HEARING**10. 1032 SANTA BARBARA ST****C-2 Zone**

(5:40) Assessor's Parcel Number: 029-212-024
 Application Number: MST2016-00071
 Owner: David Myers
 Applicant: Melisa Turner

(One-time Pre-Application Review. The proposal is a mixed-use project using the Average Unit Density [AUD] Program [Priority Housing Overlay] on two lots totaling 7,497 square feet with a density of 48 dwelling units per acre (du/ac). The project is proposed as a three-story building, with eight units and 1,369 square feet of nonresidential development, with 11 covered parking spaces. The units will include 7 two-bedroom units and one studio unit. Existing on the site are a one-story office building and a one-story single-family residence that will be demolished. A modification is requested for the front balcony/deck to encroach in the five-foot variable setback off Santa Barbara Street.)

(Comments only. Project requires environmental assessment and Staff Hearing Officer review.)

Actual time: 6:09 p.m.

Present: Mark Shields and David Watkins, DesignARC

Staff comments: Ms. Kaufman read comments from Nicole Hernandez, Urban Historian:

The structure at 1032 Santa Barbara Street, constructed in 1936, has been altered. The windows on the front elevation have been enclosed to be a stucco wall. The door matches the original design, but it does not convey its original appearance. The structure at 208 E. Figueroa Street does not represent an intact, unique, or particular style nor forms an integral component of a thematic complex or district and does not qualify as a historic resource. The cottage has some Victorian and Craftsman elements and was constructed in the early 20th century, year unknown. The setting has been altered as the house is surrounded by lot-line to lot-line Spanish Colonial Revival style buildings.

Ms. Kaufman also stated that this project is before the Commission for a pre-application review. A plan check has been completed. The cursory supportability comments indicated that although this is a new building, a front setback modification would be supportable due to site constraints; staff requests comments from the Commission related to this. Another application will have to be submitted after this one-time review.

Public comment opened at 6:37 p.m.

1. Commissioner La Voie acknowledged e-mailed comments of support from Jonathan Cornelius of Fore Property.
2. Commissioner La Voie acknowledged e-mailed comments of support from Kimberly Shackelford.
3. Commissioner La Voie acknowledged e-mailed comments of support from Laurie Small.
4. Mark Cornwall, neighbor, presented a letter from a group of neighbors in opposition to the project. He emphasized that the density will create parking and traffic problems.
5. Nadine Bunn, neighbor, expressed support for the project.
6. Darcy Cornwall, neighbor, expressed concern about the number of units and the lobby encroaching on the front setback.

Public comment closed at 6:48 p.m.

ATTACHMENT 3

Motion: **Continued indefinitely, with the project referred to the Planning Commission due to its highly visible location for comments relative to the following HLC concerns:**

1. Parking appears inadequate for this site.
2. Interior setbacks providing light and air to the residential units appear inadequate.
3. The density appears to be incompatible with the neighborhood.
4. The Commission questions whether adequate support services exist for this density of development in this neighborhood.

The Commission also had the following additional comments regarding the project design:

1. The architecture is exemplary and in keeping with HLC guidelines.
2. The Figueroa Street setbacks should be more consistent with those of adjoining buildings, and the existing palm trees should be preserved if possible.
3. Revise the stairwell to the roof deck to provide more variety.
4. The Commission supports the concept of the mirador providing outside space on the west elevation.

Action: Drury/Mahan, 6/0/0. (Shallanberger, Suding, and Veyna absent.) Motion carried.

**** MEETING ADJOURNED AT 7:11 P.M. ****

2. Any tree designated by a resolution of the City Council as an “historic tree”, an “historic landmark tree” or a “specimen tree” is processed and regulated pursuant to Chapter 15.24. (Ord. 5505, 2009; Ord. 5416, 2007; Ord. 5333, 2004; Ord. 4940, 1996; Ord. 4848, 1994; Ord. 4175, 1982; Ord. 3900 §1, 1977.)

22.22.145 Project Compatibility Analysis.

A. PURPOSE. The purpose of this section is to promote effective and appropriate communication between the Historic Landmarks Commission and the Planning Commission (or the Staff Hearing Officer) in the review of development projects and in order to promote consistency between the City land use decision making process and the City design review process as well as to show appropriate concern for preserving the historic character of certain areas of the City.

B. PROJECT COMPATIBILITY CONSIDERATIONS. In addition to any other considerations and requirements specified in this Code, the following criteria shall be considered by the Historic Landmarks Commission when it reviews and approves or disapproves the design of a proposed development project in a noticed public hearing pursuant to the requirements of Section 22.22.132:

1. Compliance with City Charter and Municipal Code; Consistency with Design Guidelines. Does the project fully comply with all applicable City Charter and Municipal Code requirements? Is the project’s design consistent with design guidelines applicable to the location of the project within the City?

2. Compatible with Architectural Character of City and Neighborhood. Is the design of the project compatible with the desirable architectural qualities and characteristics which are distinctive of Santa Barbara and of the particular neighborhood surrounding the project?

3. Appropriate size, mass, bulk, height, and scale. Is the size, mass, bulk, height, and scale of the project appropriate for its location and its neighborhood?

4. Sensitivity to Adjacent Landmarks and Historic Resources. Is the design of the project appropriately sensitive to adjacent Federal, State, or City Landmarks or other nearby designated historic resources, including City structures of merit, sites, or natural features?

5. Public Views of the Ocean and Mountains. Does the design of the project respond appropriately to established scenic public vistas?

6. Use of Open Space and Landscaping. Does the project include an appropriate amount of open space and landscaping?

C. PROCEDURES FOR CONSIDERING PROJECT COMPATIBILITY.

1. Projects with Design Review Only. If a project only requires design review by the Historic Landmarks Commission pursuant to the provisions of this Chapter and does not require some form of discretionary land use approval, the Historic Landmarks Commission shall consider the criteria listed in Subsection (B) above during the course of its review of the project’s design prior to the issuance of the preliminary design approval for the project.

2. Projects with Design Review and Other Discretionary Approvals. If, in addition to design review by the Historic Landmarks Commission, a project requires a discretionary land use approval (either from the Staff Hearing Officer, the Planning Commission, or the City Council), the Historic Landmarks Commission shall review and discuss the criteria listed in Subsection (B) above during its conceptual review of the project and shall provide its comments on those criteria as part of the minutes of the Commission decision forwarded to the Staff Hearing Officer, the Planning Commission, or the City Council (as the appropriate case may be) and as deemed necessary by the Historic Landmarks Commission. (Ord. 5464, 2008.)

22.22.150 Preservation Easements.

Easements restricting the use, alteration, relocation or demolition for the purpose of preservation of the facades or any other portions of designated landmarks or structures of merit may be acquired by the City through gift, devise or purchase. (Ord. 3900 §1, 1977.)

22.22.160 Incentives for Preserving Historic Resources.

A. Legislative Intent; Administrative Regulations. In enacting this section, the City Council seeks to adopt a City program of incentives to encourage the maintenance and preservation of historic resources within the City of Santa Barbara. In order to carry out this program more effectively and equitably and to further the purposes of this section, the Council may also, by resolution, supplement these provisions by adopting administrative regulations and standardized forms for a broad City program of economic and other incentives intended to support the preservation, maintenance, and appropriate rehabilitation of the City’s significant historic resources.

B. Preservation Incentives Under the State Mills Act - Government Code Sections 50280-50290. Preservation incentives may be made available by the City to owners of properties that are “Qualified Historic Properties” (as that term is used by Government Code Section 50280.1) such as individually designated City landmarks or structures of merit or those properties that are deemed to contribute to designated City Historic Districts (or Districts listed in the National Register) as determined appropriate by the City Council.

1032 SANTA BARBARA STREET

SITE INFORMATION

Applicant:	David Watkins, DesignArc Architects		
Property Owner:	David P. Myers		
Site Information			
Parcel Numbers: 029-212-024 & 029-212-002	Lot Area:	7,908 SF	
General Plan: Commercial/High Density Residential (28-36 du/ac)	Zoning:	C-2/Priority Housing Overlay (37-63 du/ac)	
Existing Use: Commercial and residential	Topography:	2%	
Adjacent Land Uses			
North – Residential Condos		East – Parking Lot & Commercial	
South – Santa Barbara St		West – Commercial	
<i>Using Santa Barbara Street Frontage</i>			

ZONING CONSISTENCY INFORMATION

Standard	Requirement/ Allowance	Proposed	
AUD Setbacks -Front -Santa Barbara -Figueroa -Interior	5 feet (variable) 5 feet (variable) 0	<5 feet (variable) >5 feet (variable) 0-1 foot (ground level) 2-6 feet (upper levels)	
Building Height	Maximum 45 feet	Maximum 36.5 feet	
Parking - Residential - Commercial	8 spaces 3 spaces	8 spaces 3 spaces	
Bicycle Parking - Residential - Commercial	8 spaces 0 spaces	8 spaces 0 spaces	
Density	37-63 du/ac	45 du/ac	
Common Open Yard	15' x 15' area	Roof deck area >15' x 15'	
Private Outdoor Living Space	Second or Higher Story Studio – 60 SF 2 bedroom – 84 SF	All units except for Studio comply with private outdoor living space requirement.	
Lot Coverage -Building -Paving/Driveway -Landscaping	N/A N/A N/A	7,235 sf 260 sf 413 sf	91.5% 3.3% 5.2%

**PROJECT DENSITY COMPARISON
OF MULTI-UNIT AND MIXED USE PROJECTS
IN GENERAL DOWNTOWN AREA**

Proposed

Project Address	Zone/Designation	Lot Size	Units/Type	Du/Ac	Design Review
1032 Santa Barbara Street	C-2/High Density – Priority Housing Overlay	7,908 SF	8/Rental	45 du/ac	HLC

Approved

Project Address	Zone/Designation	Lot Size	Units/Type	DU/AC	Design Review
1330 Chapala Street*	C-2/High Density	48,740 SF	33/Rental	30 du/ac	HLC
34 W Victoria (non-AUD)**	C-2/High Density	58,806 SF	37/Condos	28 du/ac	HLC
604 E Cota Street	C-M/Medium High Density – Priority Housing Overlay	20,607 SF	29/Rental	62 du/ac	ABR
116 E Cota Street	C-M/Medium High Density – Priority Housing Overlay	10,865 SF	15/Rental	61 du/ac	ABR
901 Olive Street (non-AUD)**	C-2/Medium High Density	33,005 SF	19/Rental	26 du/ac	ABR

*Project (Arlington Village) was originally approved under variable density, however the lot was recently split and is now developed as an AUD project.

**Project developed under variable density program prior to adoption of AUD Program

