INTERFACE

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Final
Environmental Impact Report

WATERFRONT PARK AND HOTEL

AND

YOUTH HOSTEL PROJECT

State Clearing House # 92091038

Prepared for the
City of Santa Barbara
Planning Division

CONTACT PERSON:
Janice Hubbell, Project Planner

Environmental and Land Planning Services

Conflict Management

Strategic Planning

City of Santa Barbara
California

MEMORANDUM

DATE: June 8, 1995

TO: All Interested Parties

FROM: Planning Division

SUBJECT: ADDENDUM TO FINAL EIR: WATERFRONT PARK AND HOTEL AND YOUTH HOSTEL PROJECT (#ENV92-0107)

BACKGROUND:

An EIR on the above-stated project was certified by the Environmental Review Committee on June 18, 1993. This EIR discussed impacts for this three-part project under the assumption that the various project parts would be completed more or less concurrently. However, due to lack of financing available for the hotel and hostel at this time, the applicants, the City Redevelopment Agency (RDA) and the Parker Family Trust (PFT), are proposing to phase the project instead. The RDA has bond funds that are designated for park construction and must be encumbered by early 1996. Therefore, park construction will proceed beginning in Spring 1996. However, without recognition of how local market conditions may affect the ability to support loan payments necessary to finance hotel construction, the banking industry is not presently providing loans for hotel construction in California. This limits PFT's ability to proceed with the hotel and hostel at this time, although PFT has been diligent in pursuing private financing.

As a result of the present financing conditions, the RDA and PFT have requested that the City approve a Development Agreement with the PFT which would allow park construction to proceed and delay hotel and hostel construction up to 10 years beyond expiration of the project approvals, based on the original approvals by the City in September 1993 (the Development Agreement would expire in September 2007). In exchange, the RDA and PFT propose to complete all of the required traffic and air quality improvements for all segments of the project at the time the park is constructed, except the following:

» The hotel's share of the air quality mitigation fee. The $90,000 fee would be split in accordance with the hotel and park's share of the generated traffic that is the primary contributor to air quality impacts. This fee was intended to provide partial mitigation of the air quality impact generated by the park and hotel. The park averages 40% of

the air quality impact (based on total peak hour traffic) and, therefore, 40% of the fee ($36,000) would be paid at the time of park construction. The remaining 60% of the fee ($54,000) would be paid at the time the hotel is constructed.

» Completion of the intersection improvements at the Cabrillo/Highway 101 Ramps intersection. The RDA and PFT have indicated that there are not sufficient funds to complete all other project-related traffic improvements (extension of Salsipuedes Street, signalized crosswalk at the Cabrillo/Carpinteria intersection and provision of parking spaces for the park), along with other required mitigation measures and park construction, and to also complete the intersection improvements at Cabrillo/Highway 101 ramps. Therefore, the applicants have requested that this mitigation measure be delayed until such time as the hotel is constructed.

» Other conditions related to the timing of payment of the in-lieu fee for affordable housing and how the park maintenance fee is paid are also proposed to amended. These conditions are not associated with potential environmental impacts.

DISCUSSION:

An Addendum to the Waterfront Park and Hotel and Youth Hostel EIR has been prepared as allowed under Section 15164 of the California Environmental Quality Act (CEQA) Guidelines. Section 15164 reads as follows:

(a) *The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

(b) *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary.*

(c) *An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*

(d) *The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*

(e) *A brief explanation of the decision not to prepared a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

Addendum to Final Environmental Impact Report

WATERFRONT PARK AND HOTEL

AND

YOUTH HOSTEL PROJECT

State Clearing House #92091038

June 8, 1995

Prepared by the
City of Santa Barbara
Planning Division

CONTACT PERSON:
Janice Hubbell, Project Planner

ADDENDUM PROJECT DESCRIPTION CHANGES

Park and Hotel

The applicants originally intended to construct the park, hotel and hostel concurrently. However, due to financial considerations related to construction financing of the hotel and hostel, the applicants now propose to construct the project in two phases. Construction of the park is expected to begin in 1996. It is unknown when the hotel and hostel will be built; however, the Parker Family Trust must obtain a building permit no later than September 2007.

As anticipated in the EIR, it is likely that the Garden Street extension will be completed at about the same time as the park rather than at a later date. If this occurs, the Class I short-term parking impact generated by the park will be eliminated. Originally, 43 parking spaces were to have been provided on the park property. Now, 6 spaces will provided at the park near the pump house. About 42 spaces will be provided in the triangular area along Mason Street and about 36 spaces will be added to the Santa Barbara Street public parking lot as a result of the extension of Garden Street. A minimum of 84 spaces will be provided. Moving most of the parking offsite will largely offset the loss of park land caused by the extension of Garden Street.

Grading associated with the preparation of the park and hotel project site, including drainage requirements, would be completed in two phases, instead of a single phase as originally anticipated. The park portion of the project would include the excavation of approximately 13,200 cubic yards and fill of approximately 13,200 cubic yards, thus balancing cut and fill on site. The hotel portion of the project would include excavation of approximately 17,500 cubic yards and fill of approximately 2,500 cubic yards, thus requiring the exportation of 15,000 cubic yards of material. The majority of the excavation for the hotel would be associated with the development of the proposed underground parking garage. The new habitable structures of the park and hotel site would be elevated above the 100-year flood zone, which is necessary for habitable structures (refer to Appendix B, Grading Plan).

The Parker Family Trust would be responsible for the development of the proposed luxury hotel and all associated facilities. The proposed hotel portion of the site would be constructed in one phase, beginning with the subterranean parking garage and ultimately finishing with the hotel portion of the site landscaping. Construction would require approximately 16-1/2 months to complete and must be permitted by September 2007. The project applicants have specified that all exported cleared waste material and soil would be transported in trucks with a minimum 54 cubic yard capacity.

The RDA would be responsible for the development of the proposed park portion of the site and all of the associated facilities. The proposed park would be constructed in one phase which would require approximately 9-12 months to complete. Construction of the proposed park would begin approximately in early 1996.

The applicants also propose the following additional changes to the project as approved:

» The hotel's share of the air quality mitigation fee will be delayed until the hotel is constructed. The $90,000 fee would be split with 40% of the fee ($36,000) paid at the time of park construction. The remaining 60% of the fee ($54,000) would be paid at the time the hotel is constructed.

» Completion of the intersection improvements at the Cabrillo/Highway 101 Ramps intersection will be delayed until the hotel is constructed.

» Other conditions related to the timing of payment of the in-lieu fee for affordable housing and how the park maintenance fee is paid are also proposed to amended.

Youth Hostel

The proposed Hostel has been relocated from 33 W. Montecito Street to 12 E. Montecito Street and a separate Negative Declaration has been prepared and adopted for it. However, no changes are being made to the EIR to reflect this change - since the relocation does not affect any impacts outlined in the EIR.

New Discretionary Approvals

The following additional discretionary approvals are required as a result of the proposed project phasing:

- *Development Agreement* to allow development of the park to occur in the near future and to allow the hotel and hostel to obtain building permits for construction no later than September 21, 2007. Most of the originally required conditions would be carried out at the time of park construction. However, those solely related to the hotel and hostel would occur at the time of their construction. In addition, the improvement of the Cabrillo/Highway 101 intersection improvements would occur at the time the hotel is constructed. (This agreement requires approval of an ordinance by the Planning Commission and City Council.)

- *Revisions to Coastal Development Permits and Development Plan Approvals* for the park and hotel and the hostel to allow for the phasing of the two projects. (These actions require approval by the Planning Commission.)

ADDENDUM SUMMARY TABLES

These two tables show only the changes to the impacts. All other impacts remain unchanged from the original EIR.

I. UNAVOIDABLE SIGNIFICANT IMPACTS (DECISION MAKERS MUST ISSUE A "STATEMENT OF OVERRIDING CONSIDERATIONS" UNDER SECTION 15093 OF THE STATE EIR GUIDELINES IF THE PROJECT IS APPROVED).			
RESOURCE	**IMPACT DESCRIPTION**	**MITIGATION MEASURES**	**RESIDUAL EFFECT**
Traffic and Circulation (long-term impacts)	Delay of improvements at the Cabrillo/Highway 101 intersection would create significant long term traffic impacts at this intersection due to 3 Sunday P.M. Peak Hour trips generated by the park.	None.	Significant.

II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED (DECISION MAKERS MUST MAKE "FINDINGS" UNDER SECTION 15091 OF THE CEQA STATE GUIDELINES IF THE PROJECT IS APPROVED).			
RESOURCE	**IMPACT DESCRIPTION**	**MITIGATION MEASURES**	**RESIDUAL IMPACT**
Traffic and Circulation (long-term impacts)	Project-specific and cumulative traffic would create increased congestion at already congested intersections.	A traffic signal shall be installed at the intersection of Cabrillo/Highway 101 Southbound On/Off ramps-Northbound off-ramp at the time the hotel is constructed.	Insignificant.

TRAFFIC, CIRCULATION AND PARKING

ADDENDUM IMPACTS, MITIGATION MEASURES AND RESIDUAL IMPACT DISCUSSION

The Applicants propose to complete all the required mitigation measures outlined in the EIR at the time the park is constructed, except for the Cabrillo/Highway 101 ramps intersection improvements which would be delayed until such time as the hotel is built. The following discussions have been drawn from the Waterfront Park and Hotel and Youth Hostel EIR and revised to reflect the changes that result from project phasing. Changes are shown with underlining.

3.4 Cumulative Impacts Mitigation Measures (p. 108)

- The Cabrillo/Highway 101 Southbound On/Off-ramps-Northbound Off-ramp intersection is stop sign controlled and currently operates at LOS "F". A traffic signal shall be installed at this intersection prior to Certificate of Occupancy to improve operating conditions. Installation of a traffic signal would improve existing conditions to LOS "C" (V/C = 0.73) during the Friday p.m. peak hour and LOS "C" (V/C = 0.79) during the Sunday p.m. peak hour. With cumulative baseline development, the signal would improve Friday and Sunday peak hour conditions to LOS "C" (V/C = 0.74) and LOS "C" (V/C = 0.79), respectively. With the addition of project trips, the signalized intersection would operate at LOS "C" (V/C = 0.74) and LOS "D" (V/C = 0.81), an improvement over existing unsignalized conditions (LOS "F").

  It should be noted that this signalization should be considered an interim measure. A planned widening of Highway 101 (in the next 5-7 years) would also affect the interchange. It is not clear at this time what portion of the signalization improvements would need to be modified. Mr. Wayne Schnell of Caltrans has indicated that Caltrans has reviewed the idea of signalization at this intersection and has no concerns at this time about installing signals as a temporary measure.[1] The City and Caltrans would still have to coordinate the specific details of signal installation. If signalization appears to be infeasible, consideration could be given to a "roundabout" intersection design as an alternative. An initial roundabout installation at State Route 144/Alameda Padre Serra is being reviewed by the City and Caltrans. Subject to City and Caltrans assessment of design and operation issues, a roundabout could be considered for the Cabrillo/Highway 101 Ramps intersection. In order to be consistent with the findings necessary for the

1 Personal communication with Wayne Schnell, Intergovernmental Review Coordinator with Caltrans on March 8, 1993, confirmed by comment letter of April 13, 1993.

project's Development Plan Approval, improvements to this intersection must be in place prior to issuance of Certificate of Occupancy.

The applicants propose to phase the park and hotel. The majority of the traffic and other improvements required to mitigate the impacts investigated in this EIR will be completed at the time the park is constructed. However, the applicants have indicated that the money necessary to complete the required traffic improvements at the Cabrillo/Highway 101 intersection will not be available until such time as the hotel is constructed. The park, as indicated in Table VIA-2, generates a total of 38 Friday PM Peak Hour Trips (PHT) and 96 Sunday Peak Hour Trips, of which 3% go through the Cabrillo/101 intersection (see Table VIA-4). The park contributes 1 Friday PM PHT and 3 Sunday PM PHTs at this intersection (the hotel will contribute 9 PHT and 12 PHT, respectively). **This will result in a significant unavoidable traffic impact until such time as the improvements are constructed.**

4.0 Residual Impact Statement (p. 109)

Signalizing the Cabrillo/Highway 101 Ramps intersection would considerably improve existing and cumulative operating conditions. Although much improved, the intersection would continue to exceed the City's standard LOS limit during the Sunday peak hour without further measures, which would require extensive improvements to the intersection. With the project trips added to cumulative volumes, the intersection, if signalized, would operate considerably better than cumulative conditions without signalization, but would operate above the City's standard limit during the Sunday peak hour. **Due to project phasing and the applicants' indication that it is financially infeasible to complete this improvement until the hotel is constructed, there will be a significant impact resulting from the park at the Cabrillo/Highway 101 Ramps intersection until such time as the hotel is completed or freeway improvements occur, which is first.**

City of Santa Barbara
California

MEMORANDUM

DATE: November 7, 1996

TO: All Interested Parties

FROM: Planning Division

SUBJECT: ADDENDUM #2 TO FINAL EIR: WATERFRONT PARK AND HOTEL AND YOUTH HOSTEL PROJECT (#ENV92-0107)

Attached is a copy of Addendum #2 to the Waterfront Park and Hotel and Youth Hostel Project EIR (#ENV92-0107). The basis for this Addendum and the issues it covers are included within. Addendum #1 was distributed on June 8, 1995.

If you have any questions, please contact Jan Hubbell, Project Planner, at (805) 564-5470.

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Addendum #2 to Final Environmental Impact Report

WATERFRONT PARK AND HOTEL

AND

YOUTH HOSTEL PROJECT

State Clearing House #92091038

November 7, 1996

Prepared by the
City of Santa Barbara
Planning Division

CONTACT PERSON:
Janice Hubbell, Project Planner

BACKGROUND

An EIR on the Waterfront Park and Hotel and Youth Hostel project was certified by the City Environmental Review Committee on June 18, 1993. This EIR discussed impacts for this three-part project under the assumption that the various project parts would be completed more or less concurrently. However, in 1995, due to lack of financing available for the hotel and hostel, the applicants, the City Redevelopment Agency (RDA) and the Parker Family Trust (PFT), requested approval of a Development Agreement to phase the project instead. As revised, all of the environmental mitigations for the hotel and park were to be completed with the construction of the park except the hotel's share of the air quality mitigation fee, intended to provide partial mitigation of the air quality impact generated by the park and hotel and completion of the intersection improvements at the Cabrillo/Highway 101 Ramps intersection. The hotel's share of the fee would be paid and the intersection improvements completed at the time of hotel construction.

These proposed changes resulted in the need to prepare an Addendum to the certified EIR. The conclusion was that the completed park will result in significant unavoidable traffic impacts at the Cabrillo/Highway 101 ramps intersection until such time as the improvements are completed, either as part of hotel construction or by CalTrans.

The Development Agreement and associated revisions to the Development Plan, Coastal Development Permit and other land use permits were approved by the Planning Commission and City Council in 1995, subject to a Statement of Overriding Considerations.

ADDENDUM #2 PROJECT DESCRIPTION CHANGES

The Parker Family Trust has submitted an application to revise the previous approvals for the hotel portion of this project. The proposed changes include:

- Relocation of the auto court from the corner of Cabrillo Boulevard and Salsipuedes Street to a location on Salsipuedes Street about 300 feet north of Cabrillo Boulevard;
- Relocation of the pool from a central courtyard to the front of the building at the corner of Cabrillo Boulevard and Salsipuedes Street (where the auto court was previously located);
- Deletion of a 5,000 sq. ft. terrace available to private parties and a variety of changes in the sizes and locations of the proposed restaurant, outdoor dining area, bar/lounge and banquet/meeting rooms;
- Relocation of the parking from an underground parking garage to a three-level parking garage (plus cellar) on 1.3 acres of Southern Pacific property adjacent to and immediately north of the approved hotel site, also resulting in moving the park maintenance and emergency access road to the north;
- Reduction of onsite parking from 245 spaces to 158 spaces (total parking provided would be 258 spaces, with 100 spaces provided at the Red Lion by agreement between the Red Lion and the Parker Family Trust);
- Increase in number of suites from 10 to 12 (the total number of rooms will remain unchanged);
- Revisions to the architectural design and footprint of the hotel including changes that will result in two and three story elements at the southwest corner of the hotel adjacent to the park in an area that previously included one and two story elements; and *(Original had two stories at 36 feet in the southwest area - used for public meeting/banquet rooms; new project has three stories at 39 feet in southwest area - used for hotel rooms; third story terrace rail is 25 feet above grade - only four feet higher than second story terrace in the approved plan. The tower south of the courtyard entry from the park is 45 feet tall; taller than any element in this area in the approved plans)*; and
- A reduction in net square footage of 11,358 square feet from the previous approval.

<u>New Discretionary Applications</u>

The discretionary applications required for the proposed changes to the hotel are:

a. Revision of a <u>Modification</u> of zoning regulations to allow the applicant to provide 158 parking spaces onsite (on a 1.3 acre parcel added to the project area) and 100 parking spaces in the Red Lion parking lot for the hotel for a total of 258 spaces instead of the required

345 spaces and to provide 14 bicycle parking spaces instead of the required 37 bicycle parking spaces (SBMC §28.90.100);

b. Revision of a Coastal Development Permit for development in the Appeal Jurisdiction of the Coastal Zone (CDP92-0045) (SBMC §28.45.009);

c. Revision of a Development Plan Approval for a 132,201 square foot (previously 143,559 sq. ft.) hotel with a 53,520 square foot parking garage (previously 83,166 sq. ft. underground parking area) (SBMC §28.87.300); and

d. Revision of a Development Agreement that allows the hotel and hostel to start construction by September 21, 2007. The revision would change the project description of the hotel and any other conditions of approval included in the Development Agreement. The Planning Commission will make a recommendation to City Council regarding this application.

BASIS FOR PREPARATION OF AN ADDENDUM

Addendum #2 to the Waterfront Park and Hotel and Youth Hostel EIR has been prepared as allowed under Section 15164 of the California Environmental Quality Act (CEQA) Guidelines. Section 15164 reads as follows:

(a) *The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

(b) *An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary.*

(c) *An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.*

(d) *The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.*

(e) *A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.*

Section 15162 of the CEQA Guidelines requires that a Subsequent EIR be prepared when the lead agency determines one or more of the following:

(1) *Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant effects or a substantial increase in the severity of previously identified significant effects;*

(2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*

(3) *New information of substantial importance which was not known and could not have been known with the exercise of due diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*

(A) *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*

(B) *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*

(C) *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*

(D) *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

It should also be noted that Section 15163 of the CEQA Guidelines states that a supplement to an EIR may be prepared, rather than a Subsequent EIR, if any of the conditions described in Section 15162 would require the preparation of a Subsequent EIR, and only minor changes or additions would be necessary to make the earlier EIR adequate.

The Environmental Analyst has concluded that a new Addendum to the Waterfront Park and Hotel and Youth Hostel EIR is the appropriate document necessary to recognize the project changes because none of the conditions outlined in CEQA Guidelines Section 15162 have occurred. This conclusion is based on the following:

» While the hotel will be redesigned, this does not constitute a substantial change to the project. In addition, major revisions to the EIR are not required to discuss significant new effects or a substantial increase in the severity of previously identified significant effects. While the number of parking spaces for the hotel will be reduced, parking demand will also be reduced; thus, there will continue to be no parking impact resulting from the hotel.

» The circumstances under which the project is being undertaken have not changed significantly in that the environmental setting remains substantially unchanged. Only an addition of 56,628 square feet (1.3 acres) of land area immediately adjacent to the hotel site will be added to the project area. This area will be used to provide a parking structure for the hotel. This parking structure will replace the previously approved underground parking area.

» The new information on the hotel will not result in new significant effects that were not previously discussed, the impacts will not be substantially more severe and the feasibility of mitigation measures and alternatives previously found to not be feasible has not changed. In addition, there are no new mitigation measures or alternatives that could reduce the impacts. The only changes between the certified EIR and Addendum #2 are that the number and location of parking spaces provided for the hotel changes and the location of elements of the hotel, such as the auto court and pool, change.

FORMAT:

This Addendum includes changes to the Project Description, the Summary Table, the Traffic, Circulation and Parking Section and the Visual Resources Section of the EIR. Changes are shown in underline and ~~strikeout~~.

TRAFFIC, CIRCULATION AND PARKING

ADDENDUM IMPACTS, MITIGATION MEASURES
AND RESIDUAL IMPACT DISCUSSION

2.4 Project Access and Parking Impacts

2.4.2 Project Parking
(Hotel portion of discussion only)

The hotel project parking needs would vary, dependent upon the possible combination of hotel activities. Virtually all luxury hotels include dining rooms, bar/lounge areas and some banquet/ meeting room space. The proposed project would have these features and it would be reasonable to expect that overall parking demand rates established for this type of hotel would apply to the proposed project. In fact, surveys conducted at the adjacent Red Lion hotel indicate a peak weekend rate of 1.28 spaces per room which equates to a 192 peak space demand for this project. This weekend rate includes parking used by conference facility users, many of whom may not be guests of the hotel. Using this calculation, the project's proposed 258 parking spaces (158 spaces on-site and 100 spaces on the Red Lion property) should be ample for the hotel portion of the park and hotel site's demand.

HOTEL PARKING REQUIREMENTS PER ZONING ORDINANCE				
	APPROVED HOTEL		REVISED HOTEL	
USE	Amount & Type of Use	Parking Requirement	Amount & Type of Use	Parking Requirement
Hotel Rooms	150 rooms	150 spaces	150 rooms	150 spaces
Ballroom	2200 s.f.	79 spaces	3375 s.f.	121 spaces
Meeting Rooms	1525 s.f.	55 spaces	850 s.f.	30 spaces
Bar/Lounge	52 seats	17 spaces	66 seats	22 spaces
Formal Dining Room	147 seats	49 spaces	150 seats	50 spaces
Outdoor Dining Area	167 seats	56 spaces	167 seats	56 spaces
Second Floor Terrace	333 seats	111 spaces	none	none
Retail	612 s.f.	2 spaces	600 s.f.	2 spaces
Total Requirement		519 spaces		431 spaces

To provide a conservative assessment of parking needs, consideration has been given to the potential for special events creating parking demand unrelated to the basic hotel operation. The two most likely scenarios would involve a local meeting or a wedding reception where none of the meeting or reception participants are hotel guests. **According to detailed calculations, these scenarios could result in peak parking deficits of 57-97 spaces.**[8] The redesign of the hotel to exclude the second floor terrace as a public space substantially reduces the likelihood of such a function occurring. This results in the 258 spaces as part of the revised hotel project being adequate to meet the potential parking demand generated by the hotel and related uses.

While it is unlikely that such deficits would occur with great frequency, the project could include measures to meet the occasional needs of such scenarios. Specifically, the adjacent Red Lion Resort has a 930 space parking lot which usually (99-percent of all days during a two year 1989-1991 survey) experiences a peak demand of no more than 700 spaces. During this two-year survey period, there were 73 special events, each attracting over 500 participants. ~~These statistics suggest that, even with special events at the Red Lion Resort, that hotel would almost always have a 230 space surplus (930 spaces less a 700 space demand) which could serve the overflow demand from the proposed project. However, on four days during the two year survey, parking demand at the Red Lion Resort was such that there would not have been adequate surplus parking to accommodate the project's deficit from a 300 person wedding reception.~~

While this survey suggested that there were ample spaces to meet the needs of both the Red Lion and the Waterfront Hotel, the Red Lion has since submitted an application to request an increase in the number of conference facility users. If this application is approved, the allowed number of non-hotel guest conference facility users would increase from a maximum of 500 to 1,200 attendees. A Supplemental EIR (SEIR) has been prepared on this project. The SEIR considers the proposed increase in conference facility users as well as the agreement between the Red Lion and the Waterfront Hotel to use 100 spaces on the Red Lion property for additional parking for the Waterfront Hotel. The SEIR concludes that the combination of these two changes to the existing condition would result in a parking impact. This parking impact would occur because parking demand in the Red Lion parking lot would exceed the number of spaces available.

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8 Hotel Occupancy Plus 220 Person Meeting

150 rooms @ 1.28 spaces per room	= 192 spaces
220 person meeting/2 people per vehicle	= 110 spaces
Total	**= 302 spaces**
Proposed hotel parking	= 245 spaces
Potential Deficit	= 57 spaces

Full Hotel Occupancy Plus 300 Person Wedding Reception

150 rooms @ 1.28 spaces per room	= 192 spaces
300 person reception/2 people per vehicle	= 150 spaces
Total	**= 342 spaces**
Proposed hotel parking	= 245 spaces
Potential Deficit	= 97 spaces

~~Alternatively, a~~ Additional ~~(structure)~~ parking could be constructed within the Red Lion Resort property and dedicated for use by this project. The Red Lion SEIR includes a mitigation measure that requires the redesign of the parking lot to include compact parking spaces and allow for additional valet parking. The Red Lion has submitted several alternative plans that show that this can be done which would result in reduction of parking impacts to insignificant levels. With either of these alternatives, there would be access and internal circulation issues relative to the use of the Red Lion parking lot. Any overflow vehicles would need to be clearly and efficiently directed to the Red Lion driveway. Within the Red Lion parking lot, it would be appropriate for this surplus parking area to be segregated from other Red Lion parking areas. ~~To avoid further confusion, it may be desirable to have parking attendants direct traffic within the Red Lion lot. If overflow parking cannot be provided in the Red Lion lot, an unused railroad parcel (north of the railroad tracks) could be developed with a 138 space parking lot. While this alternative could provide adequate surplus parking for occasional special events, its development would be dependent upon property acquisition and the extension of Salsipuedes Street across the railroad tracks.~~

3.0 Mitigation Measures

3.3 Project Access and Parking

3.3.1 Park

At the proposed park portion of the site, the combination of peak weekend demand and displacement of existing spaces would exceed the proposed on-site parking supply. There does not appear to be any readily feasible means for increasing the parking supply either on the park portion of the site or in the immediate area. In the absence of any feasible short-term mitigation, the excess parking demand is an unavoidable, significant, adverse impact. This impact would be mitigated in the long-term by the extension of Garden Street and the creation of 21 additional parking spaces.

3.3.2 Hotel

The following measures are required to reduce the hotel portion of the site access and parking impacts to acceptable levels.

- To ensure adequate access to the hotel portion of the site via the driveway on Salsipuedes Street, the existing median shall be shortened and a left-turn lane to store vehicles entering the project shall be provided.

- To reduce the potential for vehicle conflicts at the park's mid-block driveway on Cabrillo Boulevard, the driveway shall be designed to restrict access to right turns in/out.

- An agreement which guarantees the availability of at least 100 spaces of surplus parking at the Red Lion Resort shall be entered into as parking mitigation prior to issuance of Certificate of Occupancy. The use of surplus Red Lion Resort parking would be more than adequate to accommodate occasional overflow parking from the proposed hotel portion of the site. It is also recommended that the project's operation include provisions whereby any large special event would require an application to the City and coordination with activities scheduled at the adjacent Red Lion Resort. The City shall be a party to this agreement which would be in effect unless additional parking is provided. The agreement shall also include an annual reporting procedure. If overflow parking cannot be provided in the Red Lion lot, additional parking spaces shall be provided on site or in close proximity to the hotel portion of the site.

4.0 Residual Impact Statement

The only residual parking impact would be a weekend deficit at the proposed park portion of the site. As a result of the absence of any feasible short-term parking improvements, this would remain a significant, unavoidable impact which cannot be mitigated. This impact would be mitigated in the long-term by the extension of Garden Street and the creation of 21 additional parking spaces.

VISUAL RESOURCES

ADDENDUM IMPACTS, MITIGATION MEASURES
AND RESIDUAL IMPACT DISCUSSION

2.0 Impact Analysis

2.1 Park and Hotel Site

2.1.1 Anticipated Visual Change of the Site

The anticipated post-project site form would eventually consist of 10 acres of public park with paved walkways, recreational facilities, numerous flower gardens and landscape schemes, as well as several individual park components (i.e., The Lagoon, The Wilds, The Tot Lot, etc.). In addition, the post-project form would include a 150 room luxury hotel built on the eastern 3 acres of the site. [Development of the proposed hotel would utilize approximately 400 linear feet of the project site's 2,000 linear feet total (approximately 20% of the total site).] The hotel portion of the site would be bordered on the south and west by flower gardens and an intricate landscape scheme. The implementation of the park on the 10 acre portion of the site includes the removal of 98 trees/shrubs, and would also entail the planting of 441 new trees, as well as other plantings. The proposed park and hotel site would include the removal of the aesthetically unappealing storage facilities and all associated equipment, which would be considered a visual benefit to the site. The visually degraded Laguna Channel would also be restored and enhanced with native and non-native plant species. In addition, the proposed park portion of the site would include the introduction of additional water elements (The Lagoon and The Wilds) to the site. These additional water elements would add to the existing visual character and diversity of the site. Therefore, development of the proposed project would result in an improvement of the visual character, quality and diversity of the site. However, the site's existing visual character which is depicted as primarily undeveloped, heavily disturbed and degraded open space, would be changed to that of a planned, landscaped, public park. Nevertheless, the visual change resulting form the proposed project would be considered a visual benefit because of the site's degraded condition. Therefore, the change in the site's existing visual condition to the anticipated future condition of the proposed park and hotel site would not result in a significant adverse visual impact. In addition, the anticipated visual change would be considered a beneficial visual impact to the site and immediate vicinity, as a result of the revitalization and cleanup of the currently dilapidated site.

2.1.2 Removal or Degradation of Significant Aesthetic Resources

[This sub-section is not affected by the revised hotel project.]

2.1.3 Visual Compatibility With Surrounding Visual Character

[This sub-section is not affected by the revised hotel project.]

2.1.4 Prominent Vantage Points

[This introductory discussion is not affected by the revised hotel project.]

Vantage Point 1 - Cabrillo Boulevard

[The park impact discussion is not affected by the revised hotel project.]

Unobstructed mid-ground and background views of the Riviera and Santa Ynez Mountains, which are observed through the vacant and near treeless hotel portion of the site, would have the potential to be blocked by the solid mass of the proposed 45 foot high hotel structure (refer to Appendix F, Aesthetic Information, for graphic of line of site viewsheds). Because the proposed hotel portion of the site is envisioned to be developed with Hotel and Related Commerce (according to current zoning and Coastal Plan designations), design conditions within the Specific Plan governing the hotel portion of the site were established in an effort to reduce the potential for future development to result in significant visual impacts. In general, these design conditions limit the structural height of all potential future structures to three stories and 45 feet above the existing grade. Specific Plan design conditions governing the hotel portion of the site also require all structures to be set back a minimum of 75 feet from the curb line of Cabrillo Boulevard. Setbacks for Salsipuedes Street require one story structures to be set back 40 feet from the property line and 75 feet for two story structures. The Specific Plan Amendment, which is part of the proposed project, includes a proposal to change the existing setback to 33.5 feet from the finished curb line of the widened Salsipuedes Street. This proposed change in Salsipuedes Street setback requirements would result in the setback being 41.5 feet closer than presently allowed by the existing Specific Plan (refer to Section V, Land Use Considerations, for additional Specific Plan information). The proposed hotel would be set back 86 feet from the nearest point of Cabrillo Boulevard and 33.5 feet from Salsipuedes Street, with the third story portion of the hotel being situated on the north and northeastern portion of the hotel site.

Therefore, the hotel's proposed setbacks would meet and exceed the required setbacks established for Cabrillo Boulevard, but would not meet existing setbacks for Salsipuedes Street. Specifically, the one story portion of the hotel would be 6.5 feet short of meeting the 40 foot setback required for single story structures and 41.5 feet short of meeting the 75 foot setback for two story structures. There are also numerous other design conditions (i.e., landscaping requirements, architectural design review and view corridors/distance between buildings) contained within the Specific Plan that the proposed hotel is subject to and would be consistent with. Nevertheless, the height of the proposed hotel (45 feet) and the distance to Cabrillo Boulevard would still result in the obstruction of existing foreground views of the City's industrial area, as well as mid-ground and background views of the Riviera and Santa Ynez Mountains for approximately 410 linear feet along Cabrillo Boulevard. Because of the location (directly adjacent) of this vantage point to the park and hotel site, as well as the location of the park and hotel site to each other (contiguous), the assessment of the cumulative effects of the proposed hotel and park site on existing views observed from Cabrillo Boulevard is necessary. Therefore, the proposed 45-foot high hotel combined with the proposed park portion of the site (refer to the above park portion of the site view blockage assessment for additional information on potential park portion of the site

impacts). As a result of the visually unappealing nature of the City's industrial area, the proposed hotel portion of the site's obstruction of foreground views observed from Cabrillo Boulevard would be considered a beneficial visual impact.

When viewing the park and hotel as a single entity, the combined effects of the park's skyline trees and the hotel would result in the obstruction of existing Riviera and mountain views. Because the existing Riviera and mountain views are considered a significant visual resource to the Waterfront Area, the combined view blockage of the proposed skyline trees and hotel would be considered significant. **Therefore, the combined effects of the proposed park's skyline trees and the hotel would result in a significant adverse visual impact to Riviera and mountain views observed from Cabrillo Boulevard.**

Because the revised hotel is slightly taller along the Cabrillo Boulevard frontage than the approved and analyzed design, the hotel's contribution to this impact increases slightly. However, the impact is still considered a significant, but mitigable, adverse visual impact. It does not raise the level of significance to an unavoidable significant adverse impact.

Vantage Point 2 - Chase Palm Park/Beach Area

[The park impact discussion is not affected by the revised hotel project.]

Although the proposed hotel site is visible from nearly all locations within Chase Palm Park, one location directly south of the hotel portion of the site offers unobstructed, scenic views of the Riviera and Santa Ynez Mountains. Therefore, the following analysis of the proposed hotel's potential to obstruct existing views north of the project site is considered to be the worst-case viewing scenario from Chase Palm Park. This worst-case viewing location is situated directly south of the proposed hotel, approximately 10 feet south of Cabrillo Boulevard and just within Chase Palm Park (refer to Appendix F, View Corridors and Line of Sight Profiles, specifically View Corridor A [Attached to this Addendum]). The potential viewer at this location would be approximately 295 feet from the closest portion of the three-story hotel. Because the proposed hotel portion of the site is envisioned to be developed with Hotel Related Commerce (according to current zoning and specific plan designations), design conditions within the Specific Plan governing the hotel portion of the site were established in an effort to reduce the potential for future development to result in significant visual impacts (refer to Vantage Point 1 - Cabrillo Boulevard, for discussion of Specific Plan design conditions). As mentioned above, the proposed hotel would be consistent with the design conditions required by the governing Specific Plan. Nevertheless, the proposed hotel would result in the obstruction of existing foreground views of the City's industrial area, as well as mid-ground and background views of the Riviera and portions of the Santa Ynez Mountains (refer to Figure VIF-5, Simulated Waterfront Hotel). Specifically, all elevations below 2,500 feet would be blocked from potential viewers located at

this worst-case viewing location. Views observed from other locations with Chase Palm Park would not be obstructed to this high degree, as a result of the short linear distance (410 feet) of the proposed hotel and the viewer's orientation to the site. Although Riviera and mountain view blockage resulting from the proposed hotel would be limited to 410 linear feet, the combined effects of the proposed park portion of the site's new skyline trees and the proposed hotel would have the potential to obstruct all existing mid-ground/background view corridors observed through the park and hotel site. Views of the Riviera and mountains would be preserved by the existing view corridor presently established through Salsipuedes Street. **Therefore, the combined effects of the proposed hotel portion of the site and the proposed park portion of the site's potential skyline trees would result in a significant, but mitigable, adverse visual impact to Riviera and mountain views observed from the Chase Palm Park Vantage Point.** As a result of the visually unappealing nature of the City's industrial area, the proposed hotel's obstruction of foreground views observed from Cabrillo Boulevard would be considered a beneficial visual impact.

Because the revised hotel is slightly taller along the Cabrillo Boulevard frontage than the approved and analyzed design, the hotel's contribution to this impact increases slightly. However, the impact is still considered a significant, but mitigable, adverse visual impact. It does not raise the level of significance to an unavoidable significant adverse impact.

Vantage Point 3 - Stearns Wharf

[This sub-section is not affected by the revised hotel project.]

Vantage Point 4 - Alameda Padre Serra

Because this vantage point is elevated substantially above the park and hotel site, existing views obstructed by the proposed three-story hotel and parking structure would be minimal. The elevation of this vantage point also provides panoramic views of the Waterfront Area and Pacific Ocean, which results in the hotel portion of the site being a small portion of the view observed from this vantage point. As a result of the large distance between the site and the vantage point, as well as the expansiveness of the view, the proposed hotel and parking structure would appear as an extension of the existing Red Lion Resort and Waterfront Area in general. Although the height of the proposed hotel and parking structure would be approximately 20 feet taller than the adjacent portion of the Red Lion Resort, the distance and elevation of this vantage point reduces the viewer's ability to detect such height differences. However, the proposed hotel's roof top equipment (i.e., air conditioning unit, etc.) and the open parking on the top level of the parking structure could potentially be discernable from this vantage point, as a result of the difference in colors between the red tile roof and mechanical equipment and the potential for reflection off car windows and shiny finishes. Therefore, the proposed hotel's unappealing roof top equipment and top level of the parking structure may be considered visually offensive if adequate measures to screen or blend the equipment and the top parking level with the roof are not utilized. Nevertheless, because of the distance between this vantage point and the proposed hotel, potential impacts would be adverse, but less than significant even without screening of such equipment and the top parking level.

As a result of the large distance between this vantage point and the project site, the combined visual characteristics of the proposed park and hotel is considered insignificant. In addition, the elevation of this vantage point eliminates the potential for the park's and hotel's combined effects to obstruct any significant views. Therefore, the combined results of the proposed park and hotel would not result in a significant adverse visual impact to views observed from Alameda Padre Serra.

3.0 Mitigation Measures

3.1 Park and Hotel Measure

With regard to obstructing or degrading existing significant views, the combined effects of the proposed hotel and park site would result in significant adverse visual impacts on existing Riviera and mountain views observed from Cabrillo Boulevard and Chase Palm Park. Because the proposed hotel and park would be developed concurrently, the following mitigation measure would be required to reduce park and hotel impacts to insignificant levels.

- All of the existing views of the Riviera and Santa Ynez Mountains, which are presently obtained through occasional viewing corridors created by breaks in the park portion of the site's existing skyline trees as shown in Figure VIF-1, shall be retained and not obstructed by the proposed skyline trees. This mitigation can be achieved by limiting the quantity of broad-massed skyline tress (i.e., Eucalyptus, Pinus radiata, etc.) proposed in the landscape plan and planting new trees in a clustered fashion in order to retain viewing corridors. Windrowing of skyline trees shall be strictly prohibited.

3.2 Hostel Measures

[This sub-section is not affected by the revised hotel project.]

3.3 Recommended Measures

3.3.1 Park and Hotel Measures

In order to further reduce adverse, but less than significant visual impacts from Vantage Point 4 (Alameda Padre Serra), which could result from mechanical equipment on the proposed hotel's roof top and the exposed top level of parking for the hotel parking structure, incorporation of the following measure is recommended:

- All roof top equipment should be concealed from potential viewers. This measure may be achieved by orienting the equipment so it is concealed by roof top architecture, painting all equipment to match roofing tile or concealing the equipment within a roof top structure painted to match roofing. In addition, views of the top level of the parking structure should be minimized through the use of architectural elements and landscaping.

4.0 Residual Impact Statement

Implementing the required mitigation measures would mitigate the park and hotel's combined effects which result in significant impacts on existing Riviera and mountain views observed from Cabrillo Boulevard and Chase Palm Park. Preserving all existing views of the Riviera and Santa Ynez Mountains observed through the proposed park portion of the site would ensure Riviera and mountain views on either side (east or west) of the proposed hotel. Therefore, incorporation of the mitigation measure required above would lessen park and hotel site visual impacts to less than significant levels.

It should be noted that the proposed park and hotel were designed to preserve the majority of the property to provide the largest amount of contiguous open space for park use. The preservation of the majority of the existing views would be achieved by locating the hotel on the eastern 3 acres of the 13 acre site, by restricting <u>most of</u> the third story of the hotel to the northern portion of the hotel site and by protecting the remaining view corridors as required by the above mitigation measure. Although clustering the commercial development (proposed hotel and associated facilities) on the eastern most 3 acres of the site provides the largest amount of contiguous park land, it requires the hotel to use a second and third story which obstructs existing Riviera and mountain views. If the proposed hotel were to be located along the northern boundary of the 13 acre site, the proposed hotel could be limited to one story and the obstruction of scenic Riviera and mountain views would not occur. However, the open space character of the proposed project site would be sacrificed if the proposed hotel were to be located along the northern boundary of the park and hotel site.

In addition, implementation of the above recommended mitigation measure would further reduce the potential for viewers at Vantage Point 4 (Alameda Padre Serra) to be adversely impacted by mechanical equipment on the proposed hotel's roof top <u>and the top level of parking in the parking structure</u>.

[The hostel impact discussion is not affected by the revised hotel project.]

RISK OF UPSET

ADDENDUM IMPACTS, MITIGATION MEASURES
AND RESIDUAL IMPACT DISCUSSION

3.0 Project Impacts

[The introductory paragraph and Table VIH-1, Definition of Risk Assessment Terminology, are not affected by the revised hotel project.]

3.1 Frequency of Occurrence

The nearest automobile rail crossings to the proposed park and hotel site are located approximately 1,000 feet to the east and west of the project site, at Milpas and Santa Barbara Streets. ~~The nearest automobile rail crossing to the proposed hostel is located approximately 150 feet to the southeast, at Chapala Street.~~ These crossings have warning lights and safety gates which are automatically activated when a train passes. Given the low speed of trains passing these points (20-30 miles per hour; passenger trains slow for a station stop while freight trains normally traverse the entire Santa Barbara area at this speed) and the existence of safety gates, the frequency of a train/ automobile collision would be estimated to be in the "unlikely" range (no more than once every 100 years; rating of 3).

In the vicinity of the park and hotel site, three tracks are provided for train traffic. This allows for the separation of trains traveling in opposite directions to different tracks. The frequency of a train/train collision on these tracks is therefore "remote" (rating of 2). This will remain unchanged even with the loss of the layover track which is being moved to Goleta. ~~Similar to the tracks near the park and hotel site, there are two sets of tracks in the vicinity of the proposed hostel allowing for the separation of northbound and southbound trains.~~ Because of the separate tracks, the frequency of a train/train collision is also considered "remote" (rating of 2) in the vicinity of the hostel.

The Risk of Upset Analysis completed for the Chevron Bluffs project in Carpinteria[72] included evaluation of train derailment accidents on the tracks adjacent to the Carpinteria Bluffs project and Chevron Gas Processing Facility. After extensive review of Railroad Safety records, National Fire Protection Agency reports on train accidents and a Liquid Container Derailment Study prepared for the National Railroad Administration, the report concluded that an earthquake would be the most likely cause of train derailment. The conditions at the park and hotel site and the hostel site are similar to Carpinteria, although some aspects provide for somewhat greater safety in this instance: the tracks are flat in the vicinity of both the proposed sites and are relatively straight for 2.5 miles; train speeds are low and opposing direction train traffic adjacent

[72] Systems Safety Analysis, Chevron Carpinteria Facilities and Carpinteria Bluffs Area I Project, Reese-Chambers Systems Consultants, December 1985.

to the park and hotel site is on separate tracks. Therefore, the frequency of train derailment calculated for this region, based upon frequency of occurrence of a sufficiently strong earthquake in the region, is between 10^{-4} and 10^{-6} per year. This puts train derailment in the "remote" category (rating 2).

3.2 Severity of Consequence

[First paragraph of this discussion is not affected by the revised hotel project.]

Derailment of a passing train or a train to train collision could have two immediate effects: 1) some of the train cars could come in direct contact with structural components of the hotel ~~or the hostel~~, causing physical damage; and 2) should hazardous material be involved in the derailment, release of these materials into the environment could cause environmental damage or a threat to public health. With regard to the hotel portion of the site, the first effect would likely be restricted to the approximate 10-12 foot noise wall and ~~the hotel rooms~~ the parking structure and back of house facilities along the northern perimeter of the hotel. Both of these components are located within 80 feet of the tracks, which is the limit of most train derailment events. It is unlikely that total destruction of either of these components would occur given the low speed of the trains. ~~The hostel is at least 150 feet away from the northbound tracks and is therefore out of the 80 foot range. It should also be noted that there are existing structures which separate the southern and eastern sides of the hostel from the train tracks (i.e., Open Air Bicycles, Railway Station, California Hotel). If a northbound train is derailed these latter structures would receive the first impact.~~ With regard to the second effect, release of hazardous materials, the extent of the accident would be classified as "serious, but confined" (rating 3). The relatively flat terrain, absence of a steep embankment and slow speed of train travel through the project areas provides for an environment which should minimize the potential for catastrophic release of hazardous materials (i.e., extensive tank rupture, etc.), resulting in a slow and somewhat manageable release of these materials. Evacuation of residents, tenants and patrons of the proposed development and surrounding areas would be likely in this event.

Table VIH-2

Significance of Postulated Accidents			
Type of Activity	**Frequency**	**Severity**	**Product**
Train/Automobile	3	1	3
Train Derailment and Train/Train	2	3	6

Based upon the methodology and criteria discussed in this section, a train/auto collision would have a "risk product" of 3 with reference to the Waterfront Park, Hotel and Hostel Project, while

a train derailment would have a "risk product" of 6. Train/ automobile collisions would fall into the "low significance" category and would, therefore, be considered adverse but not significant. **On the other hand, train derailment would fall into the lowest range of the "moderate significance" category, constituting a potentially significant safety impact.** However, this conclusion, in effect, is equivalent to a "worst case" analysis, in that such an event has a "remote" possibility of occurrence for this location. The magnitude of the earthquake which would be required to cause derailment of the train would likely produce greater and more far reaching damage itself, than would the train derailment.

3.3 Salsipuedes Extension

[This discussion is not affected by the revised hotel project.]

4.0 Policy Framework

[This discussion is not affected by the revised hotel project.]

5.0 Mitigation Measures

[This discussion is not affected by the revised hotel project.]

6.0 Residual Impact Statement

[This discussion is not affected by the revised hotel project.]

FINAL ENVIRONMENTAL IMPACT REPORT

on the

WATERFRONT PARK AND HOTEL AND YOUTH HOSTEL

Prepared for

the

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I. INTRODUCTION

A. GENERAL BACKGROUND

The project to be assessed in this EIR is being proposed by two applicants. The Redevelopment Agency of the City of Santa Barbara (RDA), in conjunction with the Parker Family Trust (Trust), is proposing to develop a project comprised of three separate components which would be located at two different locations. The three components of the project are: 1) the development of a 10-acre public park; 2) the development of a 150 room luxury hotel; and 3) the development of a 75 bed hostel. The proposed public park and luxury hotel would be located on the same project site, along the north side of Cabrillo Boulevard, between Santa Barbara Street and Salsipuedes Street. The hostel would be constructed approximately 3,000 feet directly west of the park and hotel site on a separate parcel, adjacent to U.S. Highway 101 and the Moreton Bay Fig Tree (southeasterly corner of Montecito and Chapala Streets).

1.0 Park and Hotel Site

The proposed park and hotel site consists of a total site area of 13.107 acres. Ownership of the park and hotel project site is currently controlled by three individual parties: the Parker Family Trust (7.943 acres); the City of Santa Barbara (4.683 acres); and Southern Pacific Transportation Company (SPTC) (0.481 acres). The General Plan designation for the park and hotel site is Open Space and the zoning designation is Hotel and Related Commerce 2. However, portions of the park and hotel site are governed by the City of Santa Barbara's Specific Plan #1. The Specific Plan, which was approved on March 12, 1985, for 10.172 acres on the eastern and center portions of the project site, placed restrictions and regulations on development of that portion of the site (including a prohibition against hotel use on the project parcels). In addition, the California Coastal Commission placed development restrictions and conditions on the Specific Plan because the project site is located within the coastal zone. Specifically, Coastal Commission conditions placed a 2.0 acre limit on developable land unless low cost visitor serving accommodations (i.e., youth hostel) are developed, in which case 3.4 of the total acres could be developed on-site.

In 1987, a proposal for the development of the park and hotel project site was submitted with 54,450 square feet of commercial space, 14,100 square feet of restaurant, 13 multi-family residences, 21,500 square feet of office space and 1.61 acres of park land. Overall, the 1987 proposal, which was termed "Fiesta Park", envisioned structures totaling 109,900 square feet to be developed on 10.17 acres. In order to allow development of the Fiesta Park project on the site, the Specific Plan would have required amendment to allow for office uses, subdivision of parcels contained within the project site and deletion of the requirement for the low cost youth hostel. Coastal Commission conditions would have required the 1987 Fiesta Park Project to provide additional open space and low cost visitor accommodations, such as a youth hostel. The 1987 Fiesta Park proposal was denied development approval as a result of inconsistencies with various Specific Plan policies. The policies of concern governed development of the project area, especially related to the lack of contiguous park space.

The site planning of the currently proposed project evolved as a result of a dialogue with the community. The initial proposal made by Parker Family Trust, as shown at a Community Environmental Council hosted seminar in December, 1989, was for a "rear-loaded" commercial project encompassing 3.4 acres of the overall site. The project would create approximately 5 acres of contiguous open space between Cabrillo Boulevard and the commercial structure.

As feedback from the community came in the early months of 1990, the initial proposal was rejected for two reasons: 1) While the open space was contiguous and a vast improvement over the open space proposed in Fiesta Park, it was still viewed, by many, as a "front yard" for the commercial project and, therefore, not acceptable; and 2) The retail/restaurant component of the project was, by design, linear in nature. The net effect was of a commercial statement which visually dominated the entire Cabrillo Boulevard frontage of the site; not unlike earlier "Fiesta Park" proposals which were rejected for that reason.

Parker Family Trust subsequently prepared an alternative proposal which addressed these concerns. The direction of the alternative proposal was based on a re-examination of the goal of providing meaningful recreational open space and an appropriate economically viable commercial component of the project.

Subsequently, the Redevelopment Agency endorsed this second conceptual plan and has been pursuing this proposed joint development project with the Parker Family Trust. At the request of the applicants for the proposed Waterfront Park, Hotel and Hostel Project, the Planning Commission on June 11, 1992, initiated the amendment of Specific Plan #1 in order to increase the total area governed by the Plan, through incorporation of an additional 2.677 acres owned by the City. The 0.258 acre parcel located at the corner of Mason and Santa Barbara Streets (proposed parking lot for park users) would not be part of the amended Specific Plan. In addition, the Specific Plan amendment proposes to allow a hotel use as a permitted use on the eastern 3 acres of the project site.

2.0 Hostel Site

The hostel project site is a 0.55 acre parcel located at 33 West Montecito Street, directly east of the City's historic Moreton Bay Fig Tree. The General Plan designation for the hostel site is General Commerce and the zoning designation is HRC-2, Hotel and Related Commerce. Ownership of the hostel project site is controlled by the Lagomarsino Family Trust and Hazel E. Laffler; however, the Parker Family Trust is currently in escrow to purchase the subject property. There are no Specific Plans governing the site. However, the hostel project site is located within the Coastal Zone and would be subject to the provisions of the City's Local Coastal Program and the California Coastal Act. The site was previously developed with a Shell Oil Company Full Service Gas Station. It is now vacant.

B. ENVIRONMENTAL REVIEW PROCESS OVERVIEW

Environmental Impact Reports (EIRs) are required under the California Environmental Quality Act (CEQA) when projects could have potentially significant effects on the environment. EIRs are designed to help identify potential physical changes to the environment resulting from land use changes and to identify measures to minimize or mitigate related significant adverse environmental impacts.

This EIR is intended to serve as the environmental document for the proposed project and the primary source of environmental information for the lead, responsible and trustee agencies. The City of Santa Barbara is the Lead Agency, taking the primary responsibility for conducting the environmental review of this project and has the principal responsibility for approving the project. The California Coastal Commission and California Department of Transportation (Caltrans) are responsible agencies because they have discretionary or appellate authority over specific aspects of the proposed project. Specifically, the Coastal Commission has appellate authority over the park and hotel project site because of the location of the site within the Coastal Zone. Specific Plan changes require an amendment of the City's Local Coastal Plan and are subject to California Coastal Commission approval. Caltrans has permit authority over the park and hotel project site because an encroachment permit is required. Caltrans is also concerned about

the project's potential to significantly impact traffic and circulation on Cabrillo Boulevard (State Highway 225). The California Department of Fish and Game is a trustee agency concerned primarily with the park and hotel project site due to proposed changes to Laguna Channel within the public park portion of the project.

This EIR is intended to fulfill CEQA's environmental review requirement for both the Lead and Responsible Agencies, to the extent that the proposed project is not substantially altered during the permit approval process. The document is to serve as an informational document, as outlined in Section 15121 (a) of the State CEQA Guidelines (as amended, 1992):

> *"An EIR is an informational document which will inform public agency decision- makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."*

The level of detail contained throughout this EIR is consistent with the State CEQA Guidelines and recent court decisions. Specifically, Section 15151 of the Guidelines states:

> *"An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure."*

The City of Santa Barbara Community Development Department prepared an Initial Study (see Appendix A) on both the park/hotel site and the youth hostel site. The City is the Lead Agency administering this project. The initial study process resulted in a scoping or focusing of the environmental analysis on a number of project-specific and cumulative issues. According to the Initial Study, the project could result in significant or potentially significant adverse environmental effects. The following environmental issues are addressed in this EIR:

- Air Quality
- Archaeological Resources
- Noise and Vibration
- Traffic/Circulation/Parking
- Recreational Resources
- Hazardous Materials
- Biological Resources
- Public Services
- Risk of Upset
- Visual/Aesthetics
- Historic Resources

Cumulative impacts which are to be assessed within this EIR relate to traffic generation, traffic safety and air quality degradation.

Other issue areas were found not to be adversely impacted by the project and, therefore, are not assessed in this report (see Initial Study, Appendix A, for discussion of issue areas not addressed in this EIR). This EIR evaluates the proposed project's environmental effects within these subject areas through the assessment of existing environmental conditions. Potential environmental impacts have been classified as unavoidably significant or significant but capable of being "mitigated" based upon adopted environmental thresholds of significance and proposed mitigation measures. Other environmental and planning issues are

covered in the sections entitled "Land Use Considerations" and "Other CEQA Concerns". This EIR also delineates alternatives to the proposed project, including the "No Project" alternative. The purpose of evaluating alternatives is to develop additional options for mitigating or avoiding significant environmental effects above and beyond the imposition of mitigation measures.

C. PREVIOUS ENVIRONMENTAL REVIEW

1.0 Park and Hotel Site

The park and hotel project site was initially evaluated in the original Park Plaza EIR and its supplement, which were prepared in 1977 and 1979, respectively. The original Park Plaza proposal envisioned the majority of the site as open space. In 1987, the Fiesta Park project was proposed on the park and hotel project site. Although the 1987 Fiesta Park project proposed to develop approximately 1.61 acres of park land, it differed considerably from the original Park Plaza project. Specifically, the Fiesta Park project proposed to develop the majority of the site with commercial, residential and office use. The present Waterfront Park, Hotel and Hostel proposal differs substantially from the 1987 Fiesta Park project, but resembles the original 1977 Park Plaza project. The Waterfront Park, Hotel and Hostel project proposes to construct approximately 10 acres of public park land and a luxury hotel on the remaining approximate 3 acres of the total 13.107 acre site. Therefore, the Waterfront Park, Hotel and Hostel proposal would utilize the majority of the project site for open space/recreation uses, as did the original Park Plaza project proposed in 1977.

2.0 Hostel Site

Previous environmental review of the proposed hostel site is limited. The site was part of the first amended Central City Redevelopment Plan (CCRP) which envisioned a transportation center on the site. Two environmental impact reports were prepared that included the proposed hostel site. A Program EIR was prepared in 1976 for the CCRP and a Supplemental EIR for the Transportation Center was prepared in 1978. The proposed hostel site has recently undergone remediation activities to remove soil contamination resulting from the operation of the previous Shell Service Station.

D. EIR's RELATIONSHIP TO DECISION-MAKING PROCESS

Environmental Impact Reports are intended to provide decision-makers and the public with information which enables them to make a decision which intelligently takes into account environmental consequences. EIRs not only identify significant or potentially significant environmental effects, but also identify ways in which those impacts can be reduced to acceptable levels, whether through the imposition of mitigation measures or through the implementation of specific alternatives to the project.

Cumulative issues must also be addressed in EIRs. They are those area-wide and additive concerns (air quality, public service demands, traffic, etc.) to which the project may contribute in an incremental manner. While these contributions may be considered individually limited in some cases, the potential exists for these contributions to be cumulatively substantial.

In a practical sense, EIRs function as a technique for joint fact-finding, allowing an applicant, concerned citizens and agency staff an opportunity to collectively review and evaluate baseline conditions and project impacts openly through a process of full disclosure. Through their analysis of a project's consistency with land use plans and policies, area-wide air quality attainment plans and other public policy documents, EIRs

also provide input into staff reports to decision-makers.

When EIRs indicate that unavoidable environmental effects could result from the implementation of a project, decision-makers are required to make a statement of overriding considerations if they approve that project. The City's voters approved Measure "E" which further limits the approval of projects with unavoidable impacts on traffic, water supply and affordable housing to those which can be classified as community priority or government displacement projects and amendments to approved projects (refer to the Land Use Section). In addition, when EIRs indicate that there are significant environmental impacts which can be mitigated, decision-makers are required to issue findings which indicate how significant effects have been mitigated to acceptable levels.

This EIR has been designed to address the above mentioned concerns in a clear and concise manner and to provide decision-makers, agency staff and the general public with an easy-to-read, full disclosure document.

To gain the most value from this report, certain key points should be kept in mind:

- *This report should be used as a tool to give the reader an overview of the possible ramifications of the proposed project. It is designed to be an "early warning system" with regard to potential environmental impacts and subsequent effects on the local community's natural resources.*

- *A specific environmental impact is not necessarily irreversible or permanent. Most impacts, particularly in urban, more developed areas, can be wholly or partially mitigated by incorporating changes recommended in this report during the design and construction phases of project development.*

- *This report, while a summary of facts, reflects the professional judgment of the author. Therefore, the reader will have to individually weigh the facts it reports.*

E. FORMAT OF THIS EIR

This EIR has been organized to satisfy the letter and intent of the California Environmental Quality Act and the Guidelines for implementation of CEQA, as amended. Its organization and content have been designed for easy use and reference. The Project Description section generally gives an indication of what is being proposed -- the substantive, temporal and technical aspects of the proposal. Necessary Agency approvals required for project implementation are also delineated. The Land Use section evaluates the existing site and proposed development in terms of existing public policy and neighborhood compatibility.

The Environmental Impact and Mitigation component of the report discusses a number of factors and considerations - the existing environmental setting and background, applicable environmental thresholds, environmental impacts (both short term and long term), policy considerations related to the particular environmental issue under analysis, mitigation measures capable of minimizing environmental harm and a residual statement as to the effectiveness of mitigation measures. Where additional actions must be taken to assure consistency with environmental policies, recommendations are made as appropriate. By consolidating environmental impact assessment and site specific policy directives within each impact area, clear linkages between impact assessment and related policy consistency can be established, resulting in more comprehensive full disclosure.

F. HISTORICAL SETTING AND BACKGROUND

Both project sites are located in Santa Barbara County within the Santa Barbara City limits. The project sites are not contiguous, but are located within approximately 3,000 feet of each other.

1.0 Park and Hotel Site

The site of the proposed public park and luxury hotel lies in the Waterfront Area. Use of the Waterfront Area for recreational purposes dates back to 1872, when Easterners began traveling to the Santa Barbara Waterfront to partake in the sulfur-charged water from springs on Burton Mound. With the development of the Potter Hotel in 1902, the area began to play an increasingly important role as a recreational destination. During this same time, private citizens began to acquire East Beach for park land with several individuals deeding park land to the City. Portions of the site itself have provided visitor serving functions; i.e., the Shore Acres resort community developed in 1909.

The proposed public park and luxury hotel site has been considered for a variety of development concepts in recent years. As part of the City's initial redevelopment planning, the site was considered for a variety of uses including ocean-oriented industry and visitor serving (i.e., hotel/conference center) development. As the City developed its Local Coastal Plan (LCP), the site was designated for park space, parking and Hotel/Visitor Serving Commercial. Since the adoption of the City's LCP, portions of the site have been subject to a Specific Plan overlay. The overlay designates the subject portion of the Specific Plan area for park use(s) as a primary use and residential and visitor-serving commercial uses as a secondary use. In addition, the Specific Plan overlay includes a specific prohibition of hotel uses.

2.0 Hostel Site

The proposed hostel site lies just south of U.S. Highway 101, east of Mission Creek within the Waterfront Area. At 33 West Montecito Street, the site is situated at the corner of Chapala and West Montecito Streets, directly east of the historic Moreton Bay Fig Tree. The first structure to be constructed on the site has been documented as a brick building built in 1930 that was utilized for "Auto Sales and Repairs"[1] and the area within the immediate vicinity is considered historically significant. Located just southeast of the proposed hostel site, the Santa Barbara Railway Station was built in 1905. The Railway Station was located at this site in order to provide convenience for visitors who generally stayed at the Potter Hotel during the early 1900's. Originally, the Potter Hotel was located approximately 900 feet from the station. Although the hostel site is currently vacant, a full service Shell Oil Company Gas Station was operated on the site until its demolition in 1989.

[1] MacFarlane Archaeological Consultants, 1991.

II. EXECUTIVE SUMMARY

A. SUMMARY OVERVIEW

The Summary Table which follows is intended to provide an overview of the findings and conclusions of this Environmental Impact Report. In general, it classifies environmental impacts by level of impact and offers mitigations and conclusions as to the residual effects after implementation of mitigation measures. The impact classifications indicate whether an impact is considered unavoidable (incapable of being reduced to acceptable levels), avoidable (subject to the imposition of mitigation measures which reduce significant impacts to acceptable levels) or adverse, but not significant (mitigation measures are recommended but not required). It should be noted that all mitigation measures imposed to alleviate or reduce significant adverse environmental impacts must be implemented and adhered to, as required by State CEQA Guidelines. Mitigation measures imposed on adverse, but less than significant environmental impacts are recommended but not required by State CEQA Guidelines. Beneficial impacts are not summarized in the Summary Table. A brief synopsis of the project's consistency with applicable agency plans and policies is provided within a matrix in Section V, Land Use Considerations. In addition, a list of project alternatives and their ranking in terms of impact mitigation is provided in Section XI, Alternatives.

The following paragraphs provide a brief synopsis of issue areas not addressed in the Summary Table and not contained within Section VI, Environmental Impacts and Mitigation Measures. Specifically, the issue areas addressed below are impacts not found significant, economic and fiscal impacts, other CEQA concerns, growth inducement and alternatives.

1.0 Impacts Not Found Significant

Because the interim threshold of significance for total City water demand is 14,850 AFY and the projected water demand for fiscal year 1992/1993 is 10,500 AFY, the addition of the project's anticipated water use of 38 AFY would not exceed the 14,850 AFY threshold. Therefore, no significant impacts to water supply are expected to occur. Drainage of the project site would be provided by four proposed drainage systems, as well as the site's existing natural drainage features. According to the preliminary hydrologic and hydraulic report prepared for the park and hotel site, the proposed drainage system would be adequate to accommodate storm runoff. Therefore, drainage impacts associated with the proposed park and hotel site would be insignificant. Drainage impacts would not result on the hostel site due to the adequate drainage facilities currently existing within the immediate vicinity of the site. In addition, impermeable surfaces associated with the proposed hostel would be limited to approximately 35 percent (8,500 square feet) of the 0.55 acre hostel site.

Unlike a residential project which falls into a defined school attendance area, students generated by a commercial project or development could live and attend school in any area of the South Coast (defined as the area from Gaviota to the Rincon). It is quite possible that some or all of the 9.5 students which would be generated by the proposed project would live outside the boundaries of the Santa Barbara School Districts or attend private schools. Therefore, it is clear that this project would not result in a "substantial increase in the number of school children in the attendance area" both in terms of total number (less than 10) or in terms of location (scattered).

2.0 Economic and Fiscal Impacts

Economic Research Associates (ERA) prepared an economic and fiscal analysis on the proposed hotel portion of the site. This analysis assessed the economic and fiscal impacts the hotel portion of the site would have on surrounding Waterfront properties and on the City in general. According to ERA's analysis, the proposed hotel would have a strong positive impact on the economy of the South Coast Area and the future fiscal position of the City of Santa Barbara. Therefore, it is ERA's conclusion that the proposed project would have a substantial, beneficial fiscal and economic impact on the community.

3.0 Other CEQA Concerns

The justification for proposing development of the park and hotel site at this time, rather than reserving the site for future alternative development is primarily associated with the following reasons: 1) the restoration of the site's present dilapidated condition, which is considered a visual blight within the City's scenic Waterfront Area; 2) the present demand for a luxury hotel within the City of Santa Barbara, which currently does not capture its fair share of the luxury hotel demand in California; 3) the demand for additional recreational facilities within the East Side, which presently lacks an adequate amount of recreational facilities; and 4) the proposed project's land use compatibility with the site's surrounding land uses (i.e., parks, hotel and restaurants). The justification for proposing development of the hostel site at this time, rather than reserving the site for future alternative development is primarily associated with the following reasoning: existing California Coastal Commission Conditions of Approval placed on the proposed park and hotel site require the development of a "low-cost", visitor-serving accommodation (i.e., youth hostel) within the Waterfront Area between Castillo Street to the west and the Santa Barbara Cemetery to the east. Therefore, the proposed hostel must be developed within the area mentioned above if 3.0 acres of development on the proposed park and hotel site is to be approved.

Irreversible environmental changes associated with development of the proposed park and hotel site would be long-term loss of unplanned/disturbed open space, long-term loss of mature trees/shrubs, long-term change in the existing visual condition of the site and long-term generation of significant air quality impacts. Irreversible environmental changes associated with development of the proposed hostel would not be anticipated to occur, due to the previous development of the site.

4.0 Growth Inducement

The proposed Waterfront Project could result in two types of growth-inducing impacts: 1) the creation of short- and long-term employment opportunities to draw newcomers to the region; and 2) the generation of new recreational and tourist accommodation opportunities to entice people to the area. The creation of new employment opportunities could also increase the demand for housing in the South Coast area. However, given the high availability of local workers, the proposed project would not be considered to be particularly growth inducing from a short-term employment perspective. Development of the proposed Waterfront Project would create approximately 281 long-term employment positions. Except for management positions which may involve recruitment from outside the local area, the majority of the positions would be anticipated to be filled by the local work force. Therefore, a limited number of newcomers may result from the Waterfront Project. Because the project applicants indicated in their project application that they would comply with affordable housing impact mitigation, adverse impacts on local housing availability resulting from the influx of new employees would not be anticipated to occur.

5.0 Alternatives

In terms of reducing environmental impacts, the "No Project" alternative would result in no new impacts to the area. It must be noted however, that in this case, selection of the "No Project" alternative would also not provide the beneficial impacts which the proposed project would provide. The "No Project" alternative is therefore not considered to be the environmentally superior alternative.

The California Environmental Quality Act requires that an Environmentally Superior Alternative be identified, other than the "No Project" alternative. In addition, discussion should focus on alternatives capable of eliminating any significant, adverse effects or reducing them to a level of insignificance. However, all of the alternatives outlined would still result in significant air quality impacts. The Alternative Design consistent with the Specific Plan project would result in the least amount of impacts and would, therefore, be considered the Environmentally Superior Alternative.

I. UNAVOIDABLE SIGNIFICANT IMPACTS (DECISION MAKERS MUST ISSUE A "STATEMENT OF OVERRIDING CONSIDERATIONS" UNDER SECTION 15093 OF THE STATE EIR GUIDELINES IF THE PROJECT IS APPROVED).

RESOURCE	IMPACT DESCRIPTION	MITIGATION MEASURES	RESIDUAL EFFECT
Traffic and Circulation (short-term impacts)	Development of the proposed park would create significant short-term impacts on parking supply during special events and on weekends.	None.	Significant.
Air Quality (short-term impacts)	Construction activities would create unavoidable short-term impacts due to NOx emissions.	Equipment engines shall be kept in good working condition and in proper tune as per manufacturer's specifications.	Significant.
		Lengthen the construction period during smog season to minimize the number of vehicles and equipment operating at the same time.	Significant.
		New technologies to control ozone precursor emissions shall be utilized by construction activities as they become available.	Significant.
	Construction activities would create unavoidable short-term impacts due to dust generation.	Water trucks or sprinkler systems shall be used to prevent dust from leaving the site during clearing, grading, earth moving or excavation.	Significant.
		Disturbed areas shall be treated by watering, revegetating or by spreading soil binders until an area is paved or otherwise developed.	Significant.

I. UNAVOIDABLE SIGNIFICANT IMPACTS (DECISION MAKERS MUST ISSUE A "STATEMENT OF OVERRIDING CONSIDERATIONS" UNDER SECTION 15093 OF THE STATE EIR GUIDELINES IF THE PROJECT IS APPROVED).

RESOURCE	IMPACT DESCRIPTION	MITIGATION MEASURES	RESIDUAL EFFECT
Air Quality (short-term impacts cont'd)	Construction activities would create unavoidable short-term impacts due to dust generation. (cont'd)	During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp.	Significant.
		Soils stockpiled for more than two days shall be covered and kept moist or treated with soil binders.	Significant.
		The contractor shall designate an employee to monitor the dust control program.	Significant.
		The applicant shall include all dust control measures on all grading and building plans.	Significant.
Air Quality (long-term impacts)	Project operation would create unavoidable long-term significant air quality impacts associated with ROC and NOx.	Prepare and implement a Transportation System Management Program.	Significant.
		In conjunction with the City, educational information shall be disseminated on the use of alternate modes of transportation.	Significant.
		Include design features to reduce emissions from stationary sources (such as building orientation, trees and environmentally benign building materials).	Significant.
		The City shall work with the applicant to develop appropriate offsets or mitigation.	Significant.
Archaeological Resources	None.		
Historic Resources	None.		

I. UNAVOIDABLE SIGNIFICANT IMPACTS (DECISION MAKERS MUST ISSUE A "STATEMENT OF OVERRIDING CONSIDERATIONS" UNDER SECTION 15093 OF THE STATE EIR GUIDELINES IF THE PROJECT IS APPROVED).

RESOURCE	IMPACT DESCRIPTION	MITIGATION MEASURES	RESIDUAL EFFECT
Noise/Vibration (long-term impacts)	Portions of the proposed park within 143 feet from the center line of Cabrillo Boulevard would be exposed to "Normally Unacceptable"noise levels for parks, which would result in an unavoidable, significant adverse noise impact.	None.	Significant
Noise/Vibration (short-term impacts)	If pile driving technique is used for construction of the hotel component, unavoidable, significant, adverse, short-term noise impacts would occur.	Drive a test pile on site and include all recommendations in construction techniques.	Significant.
Visual Resources (short-term impacts)	Construction of the proposed park and hotel would entail the removal of existing vegetation which would result in a short-term, unavoidable, significant adverse visual impact.	The park's proposed landscaping shall be planted. Once established, the proposed landscaping would alleviate short-term impacts.	Short-term: Significant (approximately 2 years) Long-term: Less than Significant (beyond approximately 2 years)
Biological Resources	None.		
Risk of Upset	None.		
Hazardous Materials	None.		
Recreation	None.		

II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED (DECISION MAKERS MUST MAKE "FINDINGS" UNDER SECTION 15091 OF THE CEQA STATE GUIDELINES IF THE PROJECT IS APPROVED).			
RESOURCE	**IMPACT DESCRIPTION**	**MITIGATION MEASURES**	**RESIDUAL IMPACT**
Traffic and Circulation (short-term impacts)	Truck travel from construction would create short-term traffic disruption impacts.	A truck routing plan shall be submitted to the City Transportation Div. for review and approval.	Insignificant.
		To avoid conflicts between queuing trucks and through traffic, trucks shall queue on-site, not along Cabrillo Blvd.	Insignificant.
		A construction parking plan shall be submitted for review and approval to the City Transportation Division.	Insignificant.
Traffic and Circulation (long-term impacts)	Development of the proposed park would create significant long-term impacts on parking supply during special events and on weekends.	The extension of Garden Street and the redesign of the Santa Barbara Street parking lot shall be constructed.	Insignificant.
	Development of the proposed park's mid-block driveway on Cabrillo Blvrd. would have the potential to create vehicle conflicts with traffic utilizing Cabrillo Blvrd.	The park's proposed mid-block driveway on Cabrillo Blvrd. shall be designed to restrict access to right turns in/out.	Insignificant.
	The hotel would create potentially significant impacts to site access and parking.	The existing median at the hotel driveway on Salsipuedes Street shall be shortened and a left lane-turn to store vehicles entering the project shall be provided.	Insignificant.
		An agreement to use a minimum of 100 surplus parking spaces at the Red Lion Resort shall be entered into or 100 off-site parking spaces shall be developed.	Insignificant.

II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED (DECISION MAKERS MUST MAKE "FINDINGS" UNDER SECTION 15091 OF THE CEQA STATE GUIDELINES IF THE PROJECT IS APPROVED).

RESOURCE	IMPACT DESCRIPTION	MITIGATION MEASURES	RESIDUAL IMPACT
Traffic and Circulation (long-term impacts)	Project-specific and cumulative traffic would create increased congestion at already congested intersections.	Salsipuedes Streets shall be extended to improve operating conditions on Milpas St./U.S. 101 Ramps.	Insignificant.
		A traffic signal shall be installed at the intersection of Cabrillo/Highway 101 Southbound On/Off ramps-Northbound off-ramp.	Insignificant.
		A Transportation Demand Management Program shall be reviewed and approved by the City and implemented by the applicant.	Insignificant.
Air Quality	None.		
Archeological Resources	None.		
Historic Resources	None.		
Noise and Vibration (long-term impacts)	Existing off-site activities would result in potentially significant, adverse, noise impacts to the users of the proposed park, hotel and hostel.	The Applicant's proposed acoustical barrier to be located along the northerly border of the park shall be at least 7 feet above the finished grade on the park side in area accessible to park patrons and at least 8 feet above the railroad tracks.	Insignificant.
		Closed, acoustically-upgraded window assemblies and ventilation shall be installed in hotel guest rooms to achieve the DNL 45 interior noise requirement.	Insignificant.
		Closed, acoustically-upgraded window assemblies and ventilation shall be installed in hostel guest rooms to achieve the DNL 45 interior noise requirement.	Insignificant.

II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED (DECISION MAKERS MUST MAKE "FINDINGS" UNDER SECTION 15091 OF THE CEQA STATE GUIDELINES IF THE PROJECT IS APPROVED).			
RESOURCE	**IMPACT DESCRIPTION**	**MITIGATION MEASURES**	**RESIDUAL IMPACT**
Noise and Vibration (long-term impacts)	Existing off-site activities would result in potentially significant, adverse, noise impacts to the users of the proposed park, hotel and hostel (continued).	If patio or balcony areas are to be located on the north side of the hostel, an acoustical barrier of approx. 9 feet shall be installed.	Insignificant.
	Mechanical equipment associated with the hotel would result in potentially significant adverse noise impacts on the hotel and eastern portions of the park.	The design, selection and placement of mechanical equipment shall be located to avoid impacting the easterly portion of the park and hotel guests. Appropriate sound attenuating measures shall be provided where necessary on outdoor equipment and at air intake/discharge openings for building ventilation.	Insignificant.
Noise and Vibration (short-term impacts)	Construction of the hotel would result in short-term, significant, adverse noise and vibration impacts.	If technically feasible, an alternative construction method shall be utilized instead of pile insertion.	Insignificant.
		All construction equipment shall have well-maintained, functional mufflers.	Insignificant.
		Construction activity shall be limited to 8 AM - 5 PM, Monday-Friday. Construction activities shall not be permitted on weekends or national holidays.	Insignificant.
Visual Resources (long-term impacts)	The planting of the park's proposed new skyline trees combined with the development of the proposed hotel would have the potential to obstruct existing Riviera and mountain views observed from Cabrillo Boulevard and Chase Palm Park.	All existing views of the Riviera and mountains available through the proposed park site shall be retained and not obstructed by proposed new skyline trees. Windrowing of skyline trees shall be strictly prohibited.	Insignificant.

II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED (DECISION MAKERS MUST MAKE "FINDINGS" UNDER SECTION 15091 OF THE CEQA STATE GUIDELINES IF THE PROJECT IS APPROVED).			
RESOURCE	**IMPACT DESCRIPTION**	**MITIGATION MEASURES**	**RESIDUAL IMPACT**
Biological Resources	Development of the proposed park and hotel would result in a significant adverse impact to one population of a sensitive plant (cliff aster).	The applicant shall include the cliff aster species in the landscape plan for the area along the northern perimeter of the park site within areas containing Monterey shale.	Insignificant.
Risk of Upset	Train derailment adjacent to the proposed park and hotel site and youth hostel site could create significant impacts.	An emergency response plan shall be prepared by the developer.	Insignificant.
		Safety procedures and evacuation routes shall be posted throughout the entire development.	Insignificant.
		All three components shall be constructed with fire retardant materials and shall install smoke detectors.	Insignificant.
		Fire sprinkler systems shall be installed per code.	Insignificant.
		The rear wall of the fire lane behind the hotel shall be constructed to provide optimum damage resistance.	Insignificant.
		The project shall comply with all Risk of Upset conditions in the Specific Plan.	Insignificant.

II. SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CAN BE MITIGATED (DECISION MAKERS MUST MAKE "FINDINGS" UNDER SECTION 15091 OF THE CEQA STATE GUIDELINES IF THE PROJECT IS APPROVED).			
RESOURCE	**IMPACT DESCRIPTION**	**MITIGATION MEASURES**	**RESIDUAL IMPACT**
Hazardous Materials	Potentially significant, adverse impacts related to contaminated site conditions existing on the Parker Family Trust Property could result.	The Parker Family Trust shall perform a Phase II remediation plan and implement it.	Insignificant.
	Potentially significant, adverse impacts related to contaminated site conditions existing on the Southern Pacific and Santa Barbara City Property could result.	The City shall perform a Phase II remediation plan and implement it.	Insignificant.
	Potentially significant, adverse impacts related to contaminated site conditions existing within the Salsipuedes Street extension corridor could result.	Prior to the commencement of construction, the City shall have a Phase II Investigation prepared for the land within the Salsipuedes Street extension corridor and implement it.	Insignificant.
	Potentially significant, adverse impacts related to hazardous materials could result due to project operation.	If landscape maintenance supplies are stored on-site, a plan shall be prepared to insure their safe storage.	Insignificant.
		The applicant shall develop a Hazardous Materials Management Plan, Hazardous Materials Inventory Statement and a Hazardous Materials Business Plan. All plans shall be reviewed and approved by Co. Env. Health Dept.	Insignificant.
Recreation	None.		

III. ADVERSE, BUT LESS THAN SIGNIFICANT ENVIRONMENTAL IMPACTS WHICH DO NOT REQUIRE MITIGATION. MITIGATION MEASURES ARE RECOMMENDED TO FURTHER REDUCE ADVERSE IMPACTS.			
RESOURCE	**IMPACT DESCRIPTION**	**RECOMMENDED MITIGATION MEASURES**	**RESIDUAL IMPACT**
Traffic and Circulation	An unsignalized crosswalk on Cabrillo Blvd. at Carpinteria St. could result in a safety impact.	Delete the crosswalk from the Project Description or signalize the crosswalk.	Less than significant.
Air Quality	None.		
Archaeological Resources	None.		
Historic Resources	None.		
Noise and Vibration (long-term impacts)	Existing rock crusher operations would have the potential to result in adverse, but less than significant noise impact on the proposed hotel.	None.	Less than significant.
	The PA system located at the Great Meadow Pavilion within the proposed park could potentially result in an adverse noise impact on the westerly portion of the proposed hotel.	Usage of the PA system should be limited to low or moderate sound level performances (i.e, maximum sound levels at the rear of the audience area should not exceed 80 dB). High level sound reinforcement (i.e., rock type concerts) should not be permitted. The PA system should be designed with adequate directionality to confine sound to intended area.	Less than significant.
	Existing train operations would result in sporadic noise episodes creating adverse vibration impacts on potential guests of the proposed hotel.	Portions of the Southern Pacific railroad tracks in the vicinity of the park and hotel site should be examined for uneven segments, and all identified rough spots should be eliminated.	Less than significant.

III. ADVERSE, BUT LESS THAN SIGNIFICANT ENVIRONMENTAL IMPACTS WHICH DO NOT REQUIRE MITIGATION. MITIGATION MEASURES ARE RECOMMENDED TO FURTHER REDUCE ADVERSE IMPACTS.			
RESOURCE	**IMPACT DESCRIPTION**	**RECOMMENDED MITIGATION MEASURES**	**RESIDUAL IMPACT**
Visual Resources (long-term impacts)	The proposed hotel's roof top equipment may be discernable and considered visually offensive from Alameda Padre Serra.	All roof top equipment should be concealed from potential view.	Less than significant.
	Development of the proposed hostel would result in an adverse visual impact on views of the Moreton Bay Fig Tree observed from Montecito Street.	None.	Less than significant.
Biological Resources	Development of the proposed park would result in the demolition of 600 square feet of wetlands.	The proposed project includes the creation and/or restoration of 3,000 square feet of brackish marsh wetlands. This would exceed the restoration ratio of 1:1.	Less than significant.
		The landscape plan should avoid invasive non-native species in areas adjacent to Laguna Channel and the wetlands.	Less than Significant.
	Indirect impacts to the Moreton Bay Fig Tree could result from occupancy of the hostel if increased public usage of the area under the tree's canopy occurs.	The City Arborist shall be responsible for monitoring the activities of visitors within the canopy of the Moreton Bay Fig Tree. In addition, the City's Parks and Rec. Department and/or the hostel operators should prepare an informational sign and/or pamphlet that describes the historical and aesthetic significance of the Moreton Bay Fig Tree.	Less than Significant.

III. ADVERSE, BUT LESS THAN SIGNIFICANT ENVIRONMENTAL IMPACTS WHICH DO NOT REQUIRE MITIGATION. MITIGATION MEASURES ARE RECOMMENDED TO FURTHER REDUCE ADVERSE IMPACTS.			
RESOURCE	**IMPACT DESCRIPTION**	**RECOMMENDED MITIGATION MEASURES**	**RESIDUAL IMPACT**
Risk of Upset (short-term impacts)	Development of the Salsipuedes Street extension could create short-term, construction-related safety risks to construction workers in close proximity to the tracks.	None.	Less than Significant.
Hazardous Materials	None.		
Recreation	None.		

III. PROJECT DESCRIPTION

A. PROJECT OVERVIEW

The proposed project would be located within the City of Santa Barbara, in what is commonly known as the "Waterfront Area" (refer to Figure III-1, Regional Setting). The proposed Waterfront Park, Hotel and Hostel Project is comprised of three components to be developed at two separate locations. The three components of the project are: 1) the development of a 10 acre public park which would include a carousel and other recreational amenities; 2) the development of a 150 room luxury hotel with a subterranean parking garage; and 3) the development of a 75 bed hostel. The proposed public park and luxury hotel would be located on the same project site, while the youth hostel would be constructed approximately 3,000 feet directly west of the hotel and park site on a separate parcel generally known as 33 West Montecito Street. As a result of the Specific Plan and Coastal Commission Conditions which require the development of a hostel, environmental review of the two projects (park/hotel and youth hostel) are being conducted simultaneously within this EIR.

B. PROJECT LOCATION

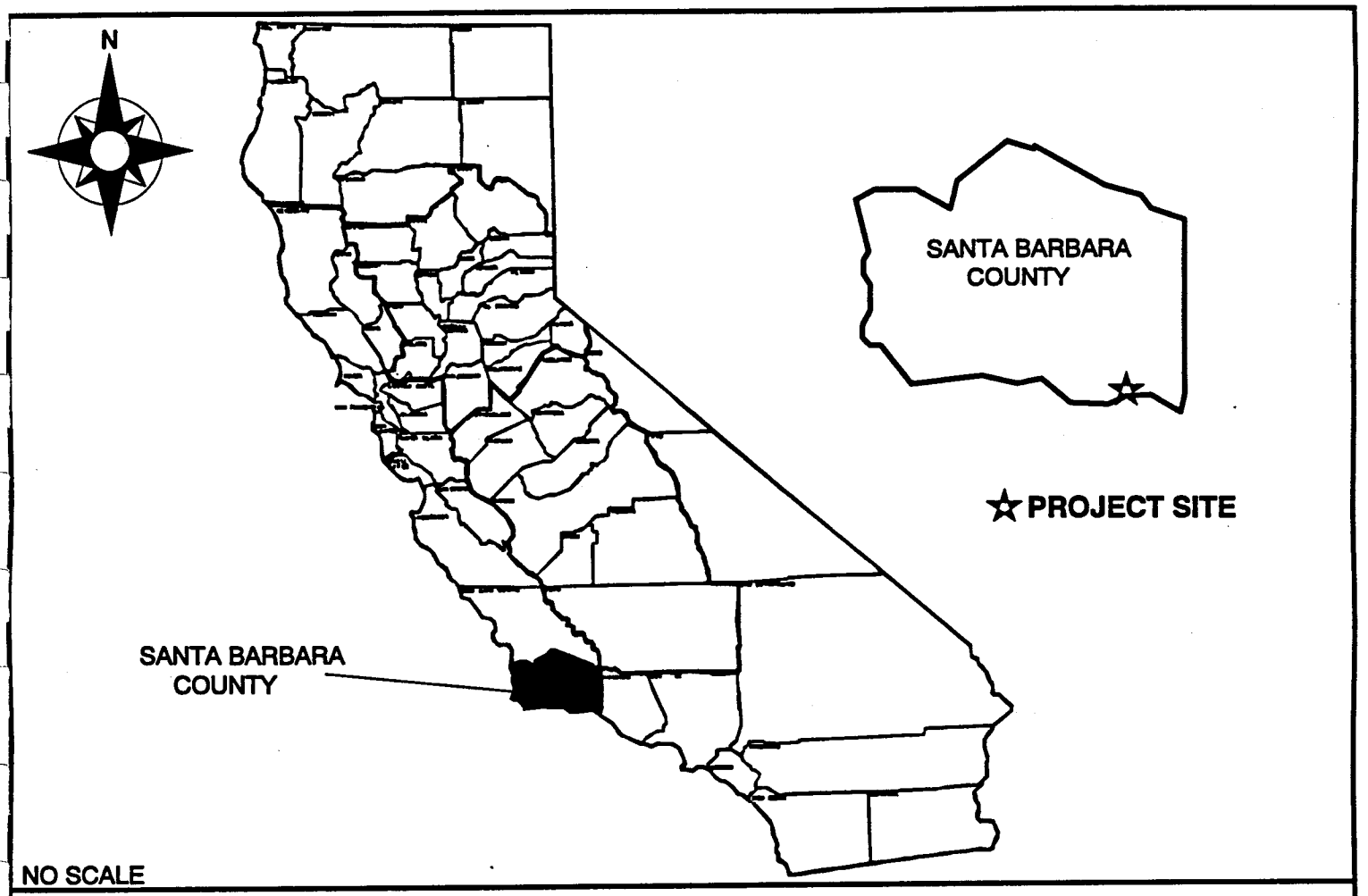
The two project sites are comprised of 12 individual parcels. As depicted in Table III-1, ownership of the proposed project sites' parcels is presently controlled by five (5) parties.

1.0 Park and Hotel Site

The 13.107 acre subject property is located within the City of Santa Barbara, in the Waterfront Area of the City (refer to Figure III-2, Local Setting). In general, the project site has a long rectangular shape with the eastern end of the site being wider than the western end. The project site is bounded by Cabrillo Boulevard to the south, by Santa Barbara Street to the west, by Salsipuedes Street to the east and by the Southern Pacific Railroad to the north, except for a small triangular portion bounded by the Southern Pacific Railroad on the south, by Mason Street on the northwest and Santa Barbara Street on the northeast. The legal description of the site is comprised of the Assessor Parcel Numbers (APN) contained in Table III-1. It should be noted that neither the RDA nor the Parker Family Trust presently have an agreement or easement to use the parcel (17-010-46) owned by Southern Pacific Transportation Company (SPTC). If such an agreement is not reached, use of the SPTC property may require condemnation proceedings.

2.0 Hostel Site

The proposed hostel site is located within the City limits of Santa Barbara in the Waterfront Area near the Santa Barbara Railway Station (refer to Figure III-2). The site is situated on the corner of Chapala and Montecito Streets and is located directly across (east) from the City's historic Moreton Bay Fig Tree, at 33 West Montecito Street. Ownership of the hostel project site is currently divided between the Lagomarsino Family Trust and Hazel E. Laffler, and the site is comprised of four (4) individual parcels totaling 0.55 acres (refer to Table III-1). However, it should be noted that the Parker Family Trust is currently in escrow to purchase the proposed hostel project site.



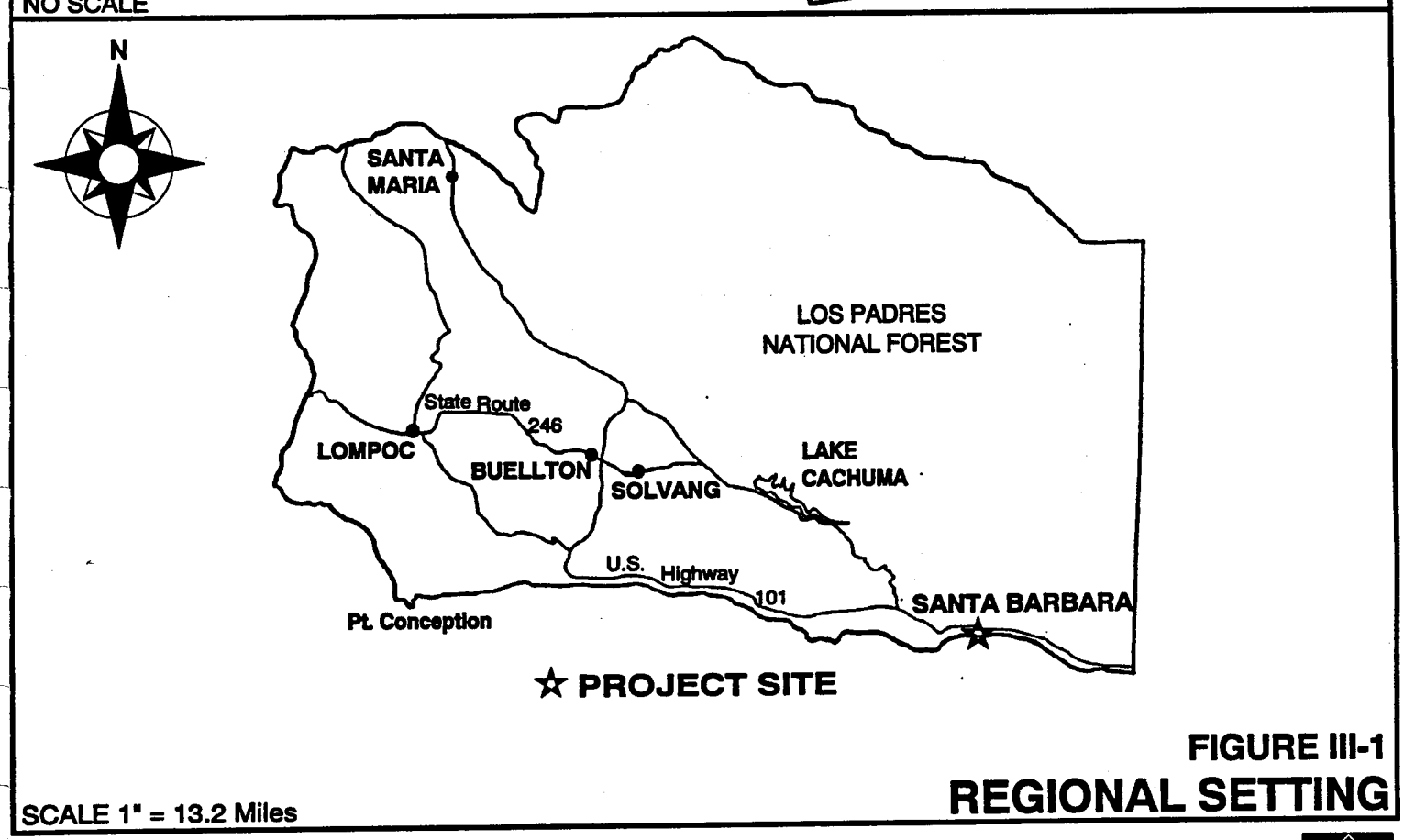
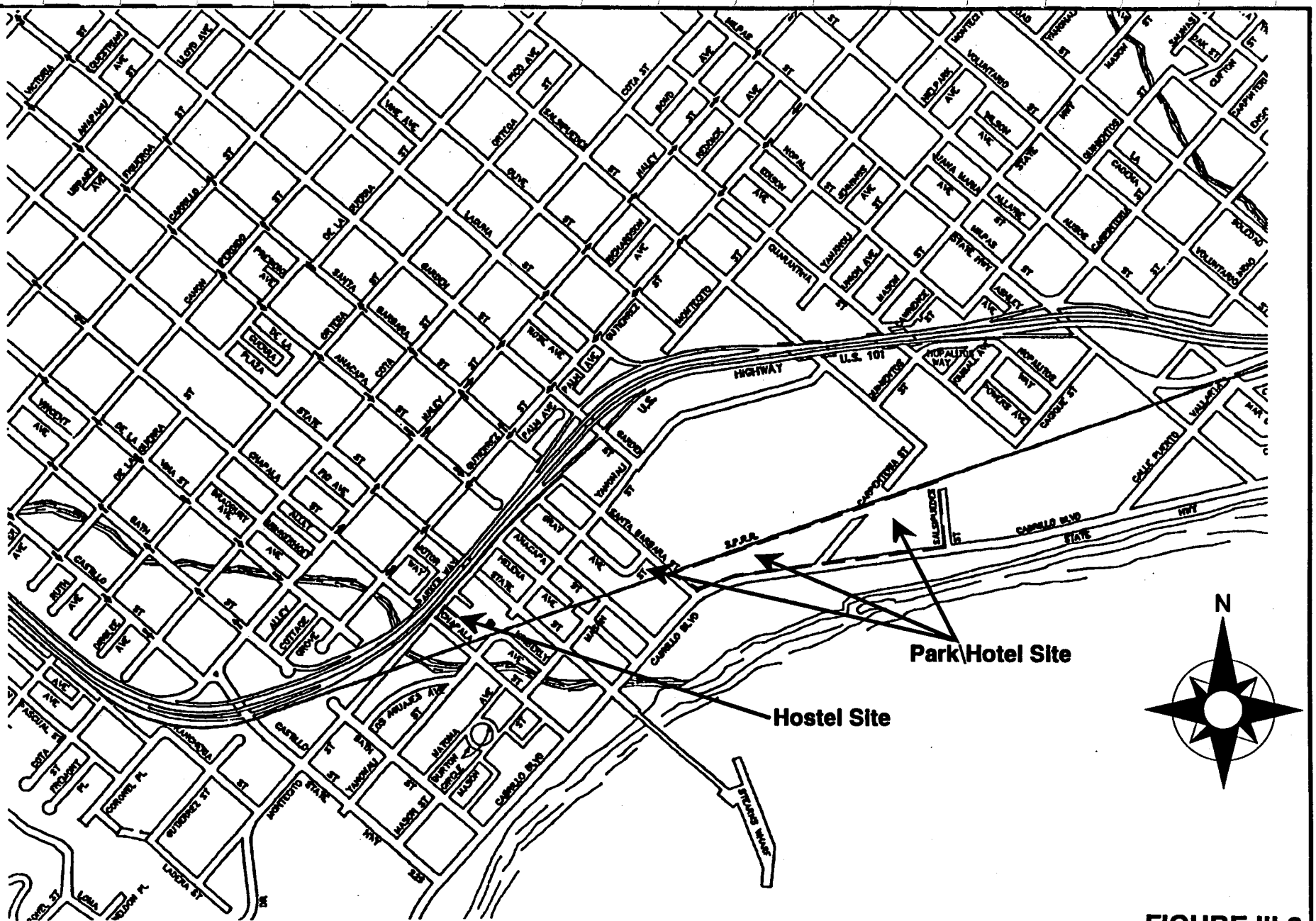


FIGURE III-1

REGIONAL SETTING

INTERFACE



NO SCALE

SOURCE: City of Santa Barbara, Engineering Division, 1992

FIGURE III-2

LOCAL SETTING

INTERFACE

Table III-1
Project Sites' Assessor Parcels

Parcel Ownership	Assessor Parcel #	Acreage	Existing Land Use
Hotel and Park Site		**13.107 acres**	
City of Santa Barbara	APN 17-010-34	2.454 acres	vacant
City of Santa Barbara	APN 17-010-35	0.609 acres	pumphouse (portion)
City of Santa Barbara	APN 17-111-01	0.753 acres	vacant
City of Santa Barbara	APN 17-192-03 (portion)	0.867 acres	pumphouse (portion)
City of Santa Barbara	APN 33-010-07 (portion)	0.258 acres	vacant
Southern Pacific Transportation Co.	APN 17-010-46 (portion)	0.223 acres	vacant
Parker Family Trust	APN 17-010-36	2.765 acres	vacant
Parker Family Trust	APN 17-010-42	5.178 acres	warehouse
Hostel Site		**0.551 acres**	
Lagomarsino Family Trust	APN 033-042-01	0.192 acres	vacant
Lagomarsino Family Trust	APN 033-042-02	0.096 acres	vacant
Hazel E. Laffler	APN 033-042-03	0.128 acres	vacant
Hazel E. Laffler	APN 033-042-04	0.135 acres	vacant

C. PROJECT SPECIFICS

The RDA and the Parker Family Trust are jointly proposing to develop the 13.107 acre project site with a luxury hotel and a public park (refer to Figure III-3, Artist's Rendering). The RDA would be responsible for the development of approximately 10 acres of public park and all improvements associated with the park (i.e., park-related parking, carousel, etc.). The Parker Family Trust would be responsible for the development of the proposed luxury hotel portion of the site on the eastern 3 acres of the approximately 13 acre site. The Parker Family Trust would be responsible for all improvements associated with the luxury hotel portion of the site, including hotel parking and hotel-site landscaping.

A hostel is also being proposed by the Trust in order to be consistent with the proposed provisions of the Specific Plan and conditions imposed by the Coastal Commission. It would be constructed at the southeast corner of the Chapala Street/Montecito Street intersection. The hostel site measures 0.55 acre and is located at 33 West Montecito Street. The Parker Family Trust would be solely responsible for the development of the proposed hostel and all related improvements.[2] In addition, proposed amended Specific Plan #1, which governs the proposed park and hotel site, would adopt and incorporate the Coastal Development Permit Conditions of Approval.

1.0 Public Park

The proposed public park portion of the site would provide the City of Santa Barbara with approximately 10 acres of contiguous publicly owned and operated park land. The park portion of the site would be constructed on the western portion of the site and would be bordered on the west by Santa Barbara Street,

[2] The development of a hostel is required by the Conditions of Approval set forth in the Coastal Development Permit for the Red Lion Resort. Specifically, Conditions of Approval for Fess Parker's Red Lion Resort state: "The developer of Parcel B [proposed luxury hotel site] shall construct a 75 bed hostel within the City's Coastal Zone between Castillo Street on the west and the cemetery on the east in any location acceptable to the Executive Director of the California Coastal Commission. The hostel shall meet the criteria for a superior grade hostel facility equivalent to that established by the American Youth Hostel Association. The hostel shall be dedicated to a public agency or private organization which will own and operate it in perpetuity as a hostel."

Section 15162 of the CEQA Guidelines requires that a Subsequent EIR be prepared when the lead agency determines, one or more of the following:

(1) *Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant effects or a substantial increase in the severity of previously identified significant effects;*

(2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*

(3) *New information of substantial importance which was not known and could not have been known with the exercise of due diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*

(A) *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*

(B) *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*

(C) *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*

(D) *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

It should also be noted that Section 15163 of the CEQA Guidelines states that a supplement to an EIR may be prepared, rather than a Subsequent EIR, if any of the conditions described in Section 15162 would require the preparation of a Subsequent EIR, and only minor changes or additions would be necessary to make the earlier EIR adequate.

The Environmental Analyst has concluded that an Addendum to the Waterfront Park and Hotel and Youth Hostel EIR is the appropriate document necessary to recognize the project

changes because none of the conditions outlined in CEQA Guidelines Section 15162 have occurred. This conclusion is based on the following:

» While the project will be phased rather than constructed concurrently, this does not constitute a substantial change to the project. In addition, major revisions to the EIR are not required to discuss significant new effects or a substantial increase in the severity of previously identified significant effects. The EIR already recognizes that the projects impacts on the Cabrillo/Highway 101 Ramps intersection will be significant and the severity of the impact is not expected to increase as a result of project phasing.

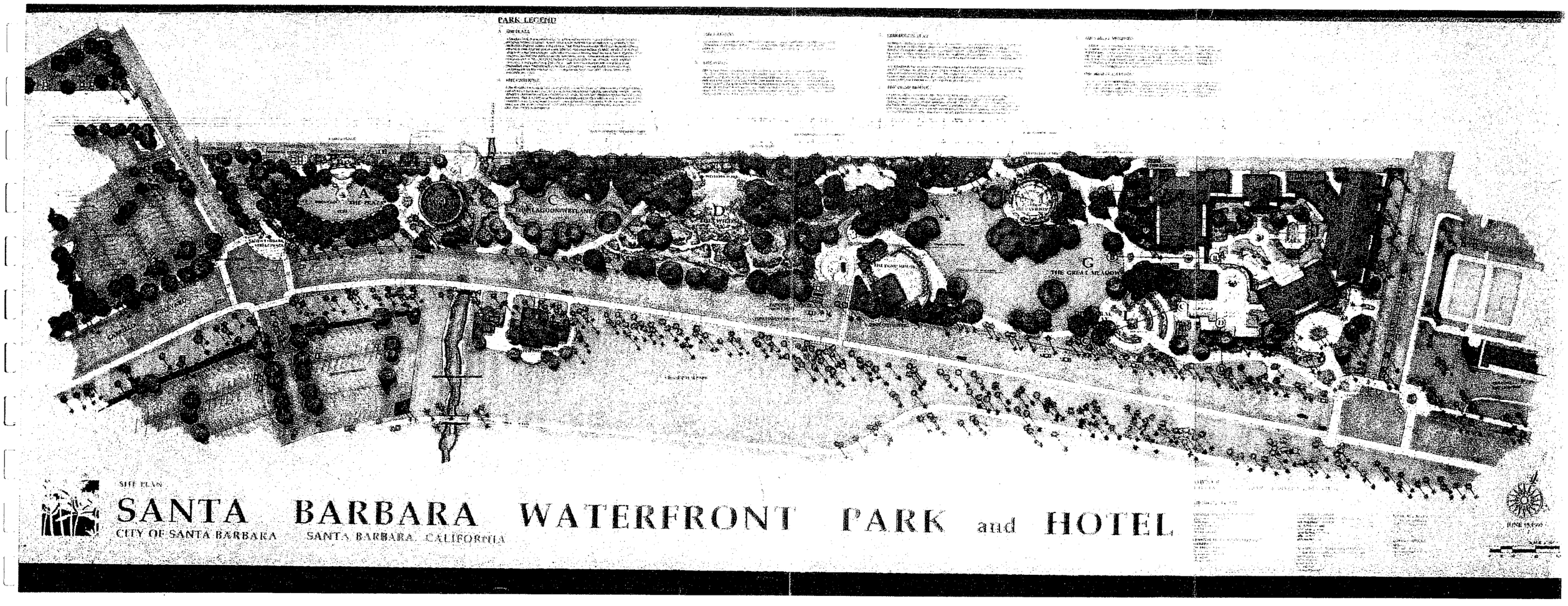
» The circumstances under which the project is being undertaken have not changed significantly in that the environmental setting remains substantially unchanged. As noted above, the EIR already recognizes that the projects impacts on the Cabrillo/Highway 101 Ramps intersection will be significant and the severity of the impact is not expected to increase as a result of project phasing.

» The new information on project phasing will not result in new significant effects that were not previously discussed, the impacts will not be substantially more severe and the feasibility of mitigation measures and alternatives previously found to not be feasible has not changed. In addition, there are no new mitigation measures or alternatives that could reduce the impacts. The only change between the certified EIR and the Addendum is that the timing of mitigation measure changes. This will result in an unavoidable significant impact at the Cabrillo/Highway 101 Ramps intersection until such time as the hotel is constructed. However, as noted in the Addendum, the park contributes 3 Sunday P.M. Peak Hour Trips (PHT) to the intersection while the hotel contributes 12 Sunday P.M. PHT to the intersection. The delay in construction is not expected to result in a new significant impact not previously discussed.

CONCLUSION:

The Addendum includes changes to the Project Description, the Summary Table and the Traffic, Circulation and Parking Section of the EIR which follow this Memorandum. Changes are shown in <u>underline</u> and ~~strikeout~~.

[J:\...\JH\PARK\ENV\ADDENDUM.MEM]



SOURCE: George W. Girvin Associates

FIGURE III-3
ARTIST'S RENDERING

on the south by Cabrillo Boulevard, on the north by the Southern Pacific Railroad tracks and on the east by the proposed hotel portion of the site. The proposed park would be open to the public seven days a week, between sunrise and one half hour after sunset. It should be noted that the park could be utilized up until 10:00 PM with a special use permit obtained from the City of Santa Barbara's Parks and Recreation Department. Additional parking for the park portion of the site would be provided on a 0.253 acre site west of Santa Barbara Street and north of the railroad tracks.

1.1 Park Components

As depicted in Figure III-4, Park/Hotel Site Plan, the proposed park portion of the site would incorporate the following eight distinct physical elements to create active and passive recreational opportunities (refer to Table III-2, Park Components):

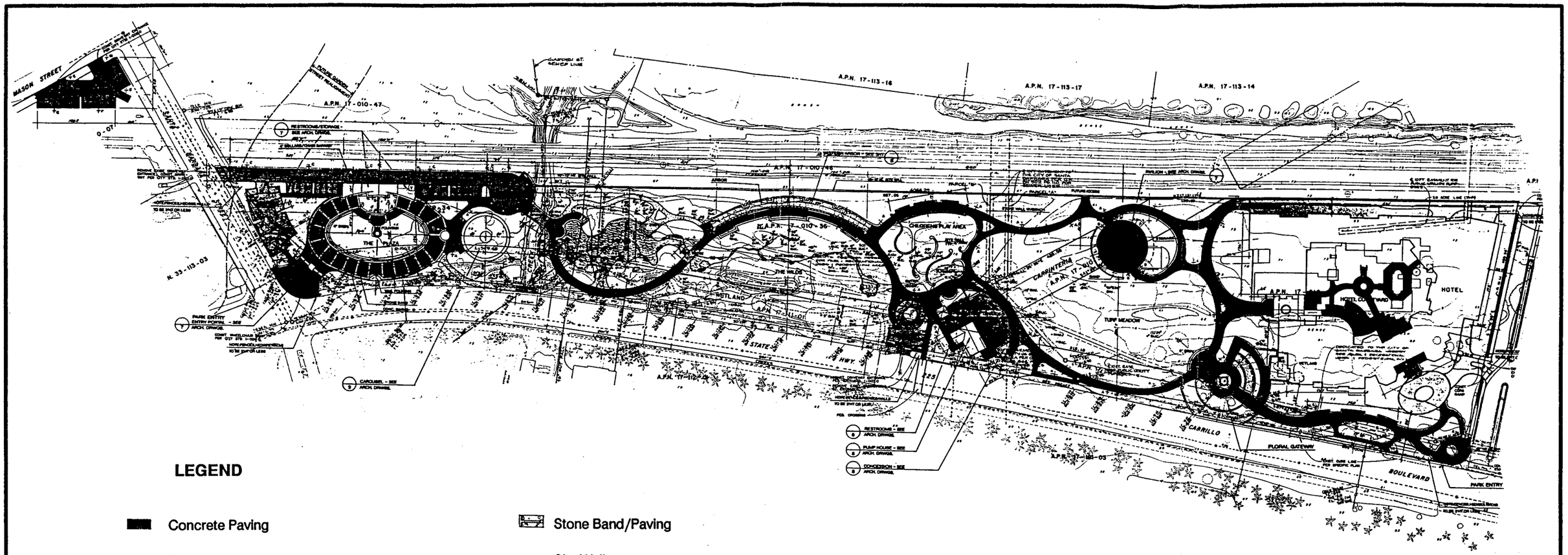
- The Plaza: An oval plaza with a double row of canopy trees on the perimeter. The focal point would be a Moorish fountain in the central area. The plaza would contain a large activity space with amenities including benches and restrooms. The Plaza is proposed to be located on the western portion of the site, directly east of the park's western entrance.

- The Carousel: A 5,026 square foot carousel (merry-go-round) with a maximum seating capacity of 32 persons. The carousel may be fully or partially enclosed to allow for protection from weather. Concession carts would meander through the carousel area. The carousel would be located directly east of the plaza, within the western portion of the park portion of the site.

- Water Elements: There are three separate water elements proposed which would visually appear as one. The three separate water systems would be composed of Laguna Channel, The Lagoon and the creeks at The Wilds. Laguna Channel would continue to flow and operate as it presently does. However, the edges of the channel would be cut back to a maximum 3:1 slope, and native riparian plant species would be planted on the creek banks. The 12,500 square foot Lagoon would be fed by a combination of potable, reclaimed and brackish waters; the latter would be pumped from the subterranean parking garage at the proposed hotel portion of the site. The water within the Lagoon would be separated from Laguna Channel by an earthen berm below the proposed bridge. The bridges would camouflage the bermed areas that allow for separation of the water elements and as a result, the bridges would convey the image of the water systems being connected although they are independent. The Lagoon water would circulate through filters and would occasionally (biannually) flow into Laguna Channel. The Lagoon is also designed to accommodate periodic flooding from Laguna Channel. The Lagoon would be located just east of the carousel, but still in the western half of the park portion of the site.

- The Wilds: The creeks at The Wilds would be supplied with potable water which would be filtered and chlorinated or otherwise purified with the intention of allowing children to play in the water. This water would occasionally be drained via a pipeline to the City's El Estero Wastewater Treatment Plant which is located directly north of the proposed park portion of the site. No chlorinated water would be released into Laguna Channel. The Wilds would be considered the naturalistic portion of the park and would include a children's play area, a vine-covered pedestrian walkway with benches, bubbling creeks, meandering paths, open native grass meadows and heavily planted shrub areas. The Wilds would be located directly east of The Lagoon, which would be considered the middle of the park.

- Children's Play Area: At the eastern edge of The Wilds, a 4,943 square foot play environment for



LEGEND

- Concrete Paving
- Emergency Vehicle Access
- Hotel Fire Access
- Asphaltic Concrete Paving
- Decomposed Granite Paving
- A+ Pedestrian Light - 12' Ht. HPS
- B+ Decorative Wall Light - Gas or Inandescent
- C+ Parking Light - 20' Ht. HPS
- Stone Band/Paving
- Site Walls
- Site Boulders
- Water Features - Manmade
- Limit of Wetlands
- T Trash Area
- BP Bike Parking (100 Spaces Total)

N

NO SCALE

SOURCE: George W. Girvin Associates, Penfield and Smith Engineers, and Wimberly Allison Tong & Goo.

FIGURE III-4

PARK AND HOTEL SITE PLAN

INTERFACE

Table III-2
Park Project Components

PARK COMPONENTS	SQ. FT	% of Total Project
Building Footprint	10,197	1.80%
Pump House	1,800	
Restrooms	388	
Storage	434	
Concessions	352	
Mechanical	36	
Maintenance	2,161	
Carousel	5,026	
Turf Area	132,717	23.20%
Planting Area	112,771	19.70%
Parking	33,300	5.80%
Hardscape/Path	108,528	19.00%
Play Area	4,943	0.90%
Tot Lot	1,057	0.10%
Lagoon	12,500	2.20%
Creeklets	900	0.20%
Pavillion	3,848	0.70%
Wetlands	19,500	3.50%
PARK TOTAL	**440,261**	**77.10%**

Table III-3
Hotel Project Components

Hotel Components	SQ. FT.	% of Total Project
Building Footprint	61,184	10.70%
Basement Total	100,315	
Infrastructure Support*	17,149	
Parking	83,166	
Ground Floor Total	61,184	
Lobby/Recreation	2,922	
Waiting Lounge	1,431	
Retail	713	
Bar/Lounge	1,622	
Dining Room	1,359	
Kitchen	2,481	
Ballroom	2,301	
Function Rooms	3,536	
Guest Rooms	26,302	
Back of House	4,303	
Toilets	860	
Stairs/Circulation	12,354	
Second Floor Total	53,474	
Waiting Room	1,400	
Guest Rooms	30,264	
Back of House	1,665	
Toilets	502	
Stairs/Circulation	8,916	
Third Floor Total	29,410	
Guest Rooms	21,120	
Back of House	1,095	
Stairs/Circulation	7,195	
Pool/Deck	2,840	0.50%
Outdoor Dining Area	2,500	0.50%
Hardscape/Paths	33,755	5.90%
Turf Area	13,687	2.40%
Planting Area	16,714	2.90%
HOTEL SITE TOTALS	244,383	22.90%

*Infrastructure Support includes mechanical rooms and back-of-house functions such as laundry, administrative offices, storage and related functions.

Table III-4
Hostel Project Components

HOSTEL COMPONENTS	SQ. FT.	% of Hostel Project
New Building Area	9,762	.
1st Floor (Footprint)	5,434	22.25%
2nd Floor	4,328	
Paved Area	8,500	35.45%
Landscaped Area	10,142	42.30%
HOSTEL TOTAL	**23,978**	**100.00%**

school age children and a 1,057 square foot tot lot located for parental supervision would be constructed. Specific types of recreational equipment to be located in Children's Play Area have yet to be determined, but community input would be considered before finalizing design of the play area.

- The Pump House: The existing pump house would be renovated to provide for Park Staff offices, storage, first aid station, food concessions, and a public meeting room for various activities, including organized youth functions. Two new small structures connected to the pump house would provide public restroom facilities and concession operations (i.e., snack bar) and a drop off/arrival area with six parking spaces. The Pump House is located southeast of the Children's Play Area, adjacent to Cabrillo Boulevard.

- The Great Meadow: The Great Meadow would consist of a grassy meadow surrounded by paths and benches to encourage all types of recreational uses. The center of the meadow would be at a lower elevation than that of Cabrillo Boulevard, in order to minimize sea breezes and traffic noise. A 3,848 square foot multi-purpose pavilion with a hard surface floor area would be provided at the northeast end of the meadow. A large storage area would be incorporated into the back of the Pavilion. A public address (PA) system would be built-in and controlled from the Pump House. The Great Meadow would be located at the eastern end of the park portion of the site, directly adjacent to the west of the northern portion of the proposed hotel portion of the site.

- The Floral Gateway: The Floral Gateway would provide entry to the proposed park portion of the site from the proposed Hotel. The eastern park entrance would be layered with flower gardens and a simple fountain would be located in the center of the Floral Gateway.

Public restrooms for the proposed park portion of the site would be located directly north of the Plaza area at the western end of the park and directly adjacent to the tot lot which is located in the middle to eastern portion of the park portion of the site.

1.2 Park Parking and Access

Public parking for the proposed park portion of the site would total 63 spaces and would be provided both on- and off-site. On-site parking would be provided near the Pump House and in the northwestern portion of the site, directly behind the Plaza. On-site parking would total 43 spaces. Off-site parking would be provided on a triangular parcel located approximately 100 feet northwest of the western boundary of the proposed park portion of the site. This triangular parcel is bordered by Mason Street on the northwest, Santa Barbara Street on the northeast and the Southern Pacific railroad tracks on the south. The development of the triangular parcel into the proposed off-site parking lot would entail narrowing Mason Street and eliminating two-way traffic. Mason Street would become a one-way street, traveling in a west to east direction. Off-site parking to be provided would total 20 spaces. It should be noted that the 63 total parking spaces proposed for the park portion of the site include the replacement of the existing nine spaces currently located at the pump house on the site, plus a buffer of six spaces.[3] The proposed park would provide for no less than 100 bicycle parking spaces, which would be contained at the following three locations within the proposed park portion of the site: near the Pump House, adjacent to the Plaza and near the easterly park entrance.

[3] It should be noted that of the nine spaces, four are striped and five are parallel parking; however, none are to current standards, according to Robert Dayton, Senior Transportation Planner and Lezley Buford, Environmental Analyst with the City of Santa Barbara.

2.0 Luxury Hotel

The luxury hotel would be constructed on 3.0 acres of the 13.107 acre park and hotel project site. As depicted previously in Figure III-4, Park and Hotel Site Plan, the hotel portion of the site would be situated on the eastern portion of the project site, adjacent to Salsipuedes Street and the existing Red Lion Resort. Locating the hotel at this location on the site would provide the largest amount of contiguous land for public park uses. The luxury hotel would consist of 140 standard rooms and 10 suites located within a three story structure that would not exceed 45 feet in height above natural grade. Hotel amenities included would consist of the following on-site facilities:

- A 147 seat formal dining room
- A 52 seat lounge
- A 167 seat outdoor informal dining facility
- A 220 seat banquet room
- Three meeting rooms that have a combined total of 153 seats
- Main courtyard terrace including swimming pool, deck, gardens and gazebos
- Second floor terrace with 5,000 square feet of multiple-purpose area
- Retail space (guest amenities/gift shop)
- Guest health facility

The hotel anticipates the need to hire approximately 281 employees (139 full-time and 142 part-time employees) in order to provide service equivalent to a four or five star luxury hotel. Showers, locker rooms and bicycle storage areas would be provided for the employees at the hotel. Also, the applicant intends to meet the requirements of the Housing Mitigation Ordinance in regard to provision of affordable housing or paying an in lieu fee for affordable housing.

2.1 Hotel Components

The first floor (ground level) would provide 42 rooms and contain the majority of the service oriented amenities normally associated with luxury hotels. Table III-3, Hotel Components, contains a complete list of all amenities to be located on the first floor, second floor, third floor and in the basement. The second floor of the hotel would primarily be guest accommodations with the exception of the pantry, which would be located in the southeast portion of the second floor. The second floor would provide 59 rooms, a terrace and a sitting room. The structural layout of the third floor is very similar to that of the second floor, utilizing the majority of the third floor square footage for guest accommodations. The third floor would provide a total of 49 guest rooms. All three floors would provide maid and service storage facilities (refer to Appendix B for preliminary ground level floor plan).

2.2 Hotel Architecture

The hotel would be designed pursuant to guidelines governing a four or five star luxury facility and would utilize an Andalusian architectural motif. An Andalusian architectural motif is described as an architectural style reminiscent of Southern Spain (Andalusia) which incorporates the use of flat, unadorned stucco walls punctured by windows, stubby chimneys, iron balconies and tile roofs.[4] The Andalusian architectural style would conform to the requirements of El Pueblo Viejo Landmark District.

The hotel would also include the development of a "Viceroy's House", designed to suggest that the dwelling

4 Young and Noel, 1975.

was built in the colonial times by a Viceroy of Santa Barbara. Facing the intersection of Cabrillo Boulevard and Salsipuedes Street yet fronting neither street, the Viceroy's House is proposed to be situated to suggest that it predates both streets. The Viceroy's House would be utilized as the major interior common area, housing the lobby, reception and dining functions. All of the hotel portion of the site's related structures would form a courtyard, which would be used as the hotel portion of the site's major exterior common area. The 26,814 square foot courtyard would be designed as an interior formal garden, containing various terraced levels, fountains, gazebos and a swimming pool (refer to Appendix B for exterior elevations of hotel).

2.3 Hotel Parking and Access

Parking for the proposed hotel portion of the site would be provided by a subterranean parking garage located directly beneath the hotel. The garage would provide 245 auto parking spaces, including eight designated handicap parking spaces, as well as 50 bicycle parking spaces. An additional 100 parking spaces located on the Red Lion site would be available for shared use with Red Lion. The use of this parking would be arranged with the Red Lion management at times when parking demand at the luxury hotel portion of the site is expected to exceed 245 spaces. According to the Traffic, Circulation and Parking Section of this EIR, "an agreement which guarantees the availability of up to 100 spaces of surplus parking at the Red Lion Resort shall be entered into as parking mitigation prior to issuance of Certificate of Occupancy." A 24-hour valet service would be provided at the hotel which is consistent with luxury hotel standards. Hotel operations which would be consistent with urban-sited luxury hotels, such as off-site amenities in the form of golf, tennis, and horseback riding, would be provided by existing recreational facilities located in the Santa Barbara area. The hotel would be open for business 24 hours a day, 365 days a year.

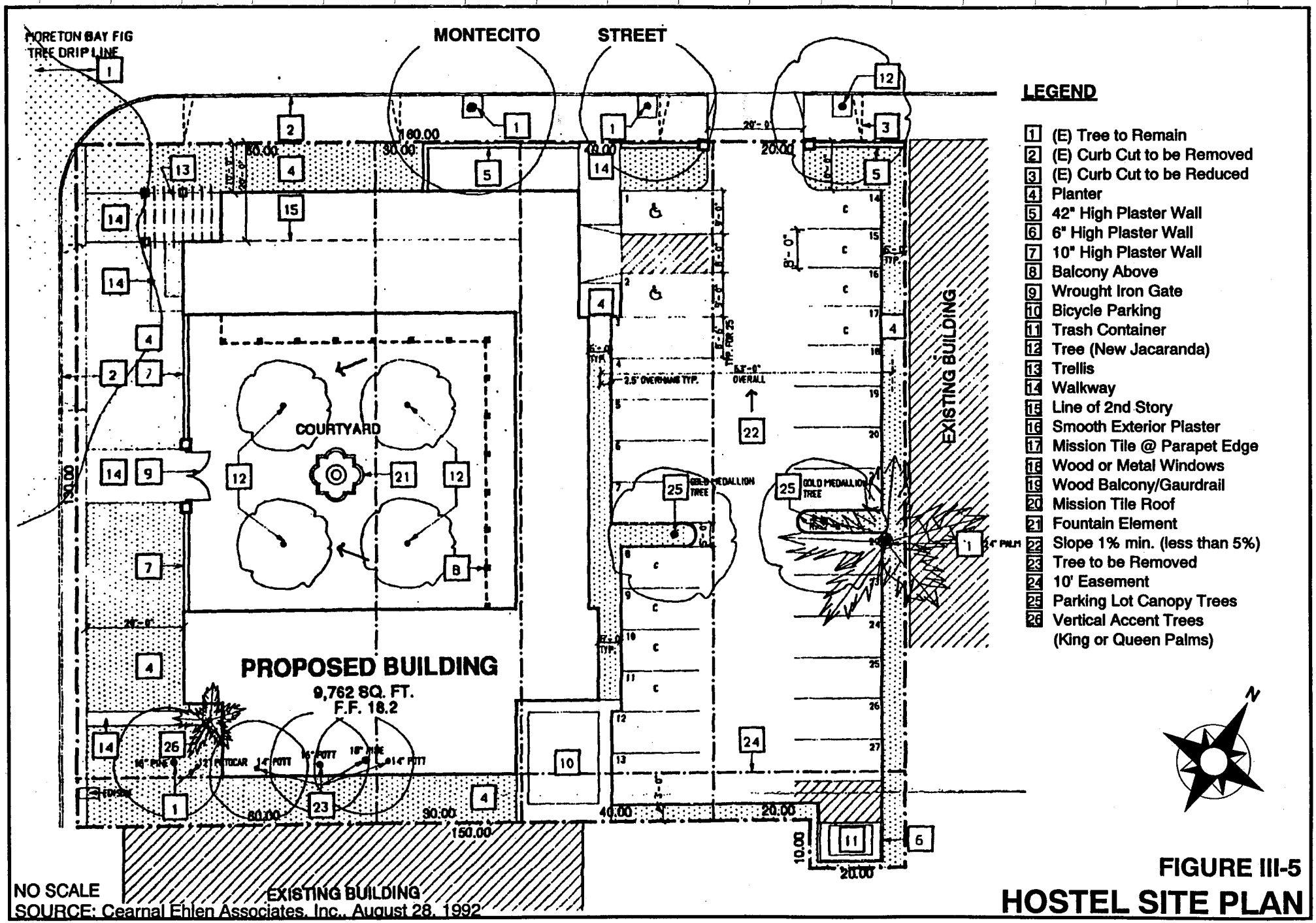
Vehicular access to the proposed hotel would be provided by two driveways located on Salsipuedes Street. The southern driveway would be an entrance and exit to the auto court, which would provide loading and unloading of guests and baggage. In addition, this driveway would provide access to the subterranean parking garage. The northern driveway would provide service-oriented access, as well as fire/emergency access along the north side of the project site. Pedestrian access to enter and exit the hotel portion of the site would be provided from two locations, as required by the City Fire Department. A pedestrian promenade to be located at the corner of Salsipuedes Street and Cabrillo Boulevard would provide the primary pedestrian access to the hotel portion of the site. The second pedestrian access to the hotel portion of the site would be provided on the western side of the hotel, just north of the hotel's ballroom. This second pedestrian access would be utilized by hotel guests entering and exiting the park portion of the site.

3.0 Hostel

The hostel would be constructed on 0.55 acres of currently vacant land located at 33 West Montecito Street within the Waterfront Area. The proposed hostel site is bordered on the north by Montecito Street and U.S. Highway 101, on the south by Open Air Bicycles and the Santa Barbara Railway Depot, on the east by Gold Coast Cycles and on the west by Chapala Street and the Moreton Bay Fig Tree. The proposed hostel would operate 365 days a year, 24 hours a day. It is anticipated that the proposed hostel would require approximately 6 total employees in order to provide appropriate service.

3.1 Hostel Components

The proposed 9,762 square foot hostel would have the ability to accommodate a maximum of 75 guests (refer to Figure III-5, Hostel Site Plan). The hostel would consist of a two story structure measuring no



NO SCALE
SOURCE: Cearnal Ehlen Associates, Inc., August 28, 1992

FIGURE III-5
HOSTEL SITE PLAN

INTERFACE

higher than 26 feet with an outdoor courtyard and parking lot. Table III-4, Hostel Components, provides the square footage of components which would be contained in the hostel.

The first floor would utilize 5,434 square feet of the proposed hostel's 9,762 square foot total. Guest accommodations located on the first floor would be limited to two handicap accessible rooms. However, the first floor would provide the majority of the hostel's amenities, such as the laundry room, the library, the dining room, etc. The restrooms on the first floor would be situated opposite each other, one set of men's and women's restrooms on the eastern side of the hostel and the other set being located on the western side.

The 4,328 square foot second floor would provide accommodations for seventy guests within the proposed 19 rooms. The guest rooms would be sized to accommodate anywhere from a minimum of 2 guests to a maximum of 6 guests per room, which is in accordance with the American Youth Hostel Standards for a superior grade youth hostel. The second floor would also provide one set of men's and women's restrooms, which would include showers.

3.2 Hostel Architecture

The design of the hostel would be very simple with mostly flat roofs and provision of openings around the courtyard (refer to Figure III-6, Computer Rendering of Hostel). The hostel would be situated and designed around the courtyard which is oriented toward the Moreton Bay Fig Tree located directly across Chapala Street. The architectural style of the proposed hostel would be consistent with requirements of El Pueblo Viejo Landmark District.

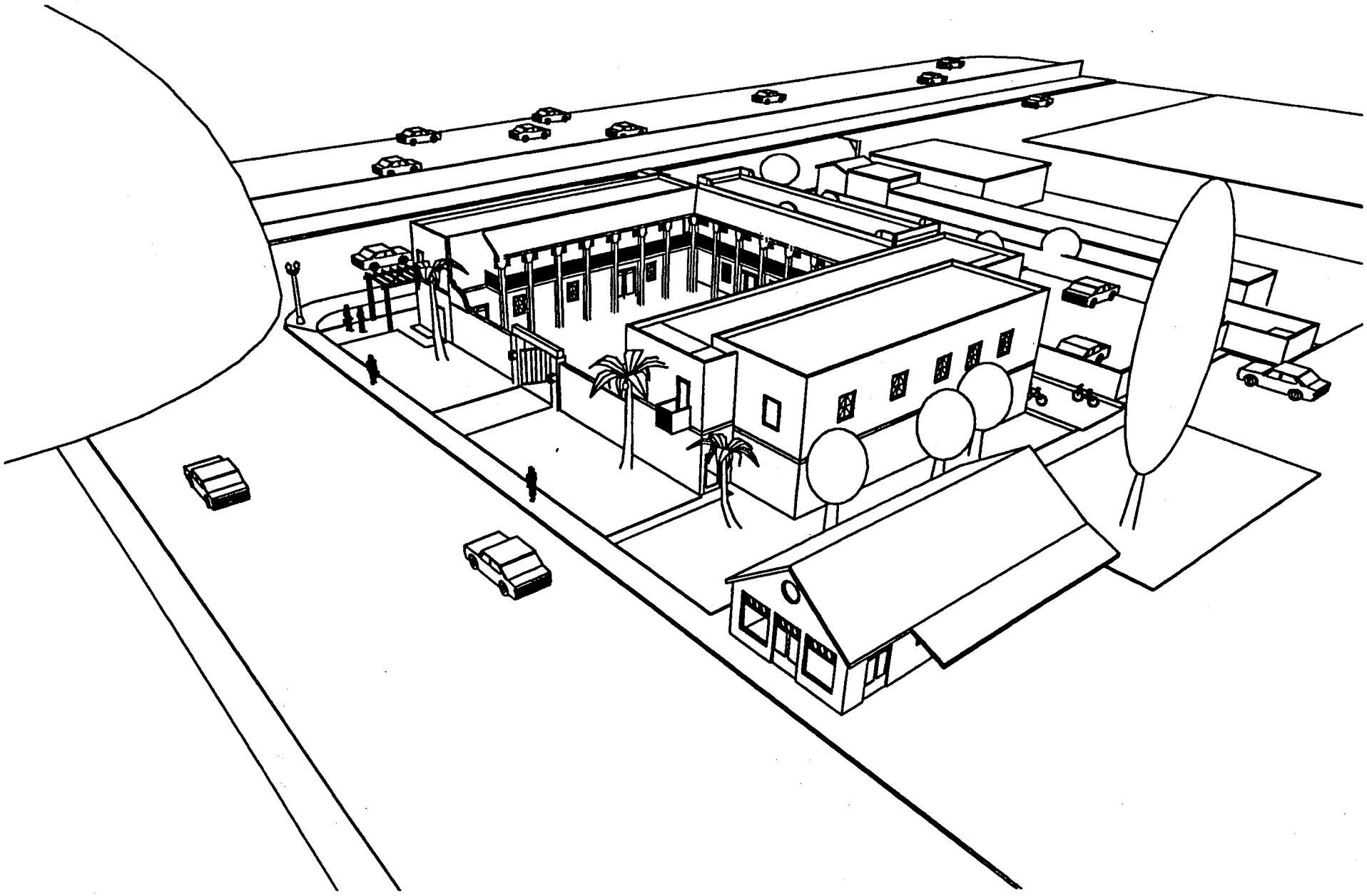
3.3 Hostel Parking and Access

Parking for the proposed hostel would be provided by a parking lot located behind (east of) the hostel. The proposed parking lot would provide a total of 27 spaces, including two designated handicap spaces. Vehicular access to the hostel would be provided via a driveway on Montecito Street, which would also provide access to the parking lot. Pedestrian access to the hostel would be provided at two locations. Located on Chapala Street, one entrance would provide access to the lobby and reception area and would be the main hostel entrance for arriving guests. Also on Chapala Street, an informal entrance would provide access to the outdoor courtyard and would be utilized by guests entering and exiting the hostel for daily tourist activities.

D. PROJECT OBJECTIVES

1.0 Park Objectives

It is the objective of the City of Santa Barbara's Redevelopment Agency to provide a 10 acre community park which offers both active and passive recreational opportunities for the benefit and enjoyment of residents and visitors. In addition, the Environmental Impact Report prepared on the Santa Barbara Central City Redevelopment Plan foresaw the need to expand the Chase Palm Park to the north through the realignment of Cabrillo Boulevard. The proposed Waterfront Park would achieve this expansion without the realignment of Cabrillo Boulevard.



SOURCE: archiTREK, January 1993.

FIGURE III-6

COMPUTER RENDERING OF HOSTEL

INTERFACE

2.0 Hotel Objectives

It is the objective of the Parker Family Trust to create a long-term economic investment through the development of a "five star", luxury hotel within the Waterfront District. According to a market overview prepared by Kenneth Leventhal and Company, there appears to be a void in the City of Santa Barbara for this type of hotel, especially with the ocean orientation that the proposed hotel portion of the site would benefit from. In addition, Kenneth Leventhal and Company's analysis indicates that there appears to be continued demand for luxury hotels with average daily rates above $200 throughout California, and that the City of Santa Barbara does not currently capture its fair share of luxury hotel demand.

3.0 Hostel Objectives

It is the objective of the Parker Family Trust to develop a 75 bed hostel within the City's Coastal Zone between Castillo Street on the west and the cemetery on the east in order to be consistent with the criteria set forth as a Condition of Approval for the original Coastal Development Permit. The applicants have proposed to incorporate this condition into the amended Specific Plan.

E. GRADING AND CONSTRUCTION

1.0 Park and Hotel Site

1.1 Grading

Grading associated with the preparation of the park and hotel project site, including drainage requirements, would be completed in a single phase. The park and hotel portion of the project would include the excavation of approximately 23,100 cubic yards and fill of approximately 39,500 cubic yards, thus requiring the importation of 16,400 cubic yards of material. All excavated material would be balanced on site. The majority of the excavation would be associated with the development of the proposed underground parking garage for the hotel portion of the site. The new structures of the park and hotel site would be elevated above the 100-year flood zone, which is necessary for habitable structures (refer to Appendix B, Grading Plan).

1.2 Construction

The Parker Family Trust would be responsible for the development of the proposed luxury hotel and all associated facilities. The proposed hotel portion of the site would be constructed in one phase, beginning with the subterranean parking garage and ultimately finishing with the hotel portion of the site landscaping. Construction would require approximately 16-1/2 months to complete and would be anticipated to begin as early as mid-1994. The project applicants have specified that all imported soil material and exported cleared waste material would be transported in trucks with a 54 cubic yard capacity.

The RDA would be responsible for the development of the proposed park portion of the site and all of the associated facilities. The proposed park would be constructed in one phase which would require approximately 9-12 months to complete. Construction of the proposed park would begin approximately in 1994 and would be conducted simultaneously with the construction of the proposed hotel portion of the site, although park construction would be completed sooner than hotel construction.

2.0 Hostel Site

2.1 Grading

Grading associated with the preparation of the hostel project site would also be achieved in a single phase, as a result of the relatively small quantity of cut and fill required for the development of the hostel. Development of the proposed hostel would require approximately 2,000 cubic yards of fill to be imported to the site, in order to elevate the buildings two feet above the 100-year flood zone. Elevation of the hostel site would need to be increased approximately one foot above the existing grade.

2.2 Construction

The Parker Family Trust would be responsible for the development of the proposed hostel and all associated facilities. Construction of the proposed hostel would be conducted simultaneously with the park and hotel portion of the project. In addition, development conditions placed on the hotel and park project site would likely require that construction of the hostel be completed prior to the issuance of a Certificate of Occupancy for the proposed hotel. Construction would require approximately 12 months to complete and would be anticipated to begin as early as mid-1994.

F. DISCRETIONARY ACTIONS

A variety of approvals would be required in order to allow the development of the project. The following approvals would be required in order to construct the proposed Waterfront Park, Hotel and Hostel Project:

1.0 Park and Hotel Joint Approvals Required

- *Specific Plan #1 Amendment* to incorporate 2.677 acres of the proposed park portion of the site into the existing Specific Plan which currently encompasses 10.172 acres. In addition, the amendment includes the language to allow a hotel/motel use within the Specific Plan area, specifically on the 3 acres proposed for hotel development within the project site. Several minor amendments are also proposed including a change to structural setback requirements on Salsipuedes Street. (This amendment requires approval by the City Planning Commission, City Council and California Coastal Commission.)

- *Coastal Development Permit and Development Plan Approval* to allow the development of a 150 room hotel on 3.0 acres and a 10.107 acre park (within the Appeal Jurisdiction of the Coastal Zone) at 325 E. Cabrillo Boulevard. (These actions require approval by the Planning Commission.)

2.0 Hotel Only Approvals Required

- *Request for Modification* of zoning regulations to allow the applicant to provide 245 on-site and 100 off-site parking spaces for the proposed hotel instead of the required 519 spaces. Off-site parking spaces would be provided through an agreement with the Red Lion for shared parking or by the provision of a new off-site parking lot, as is required by a mitigation measure in the Traffic, Circulation and Parking section of this EIR. (This modification requires approval by the Planning Commission.)

3.0 Park Only Approvals Required

- *Conditional Use Permit* to allow an off site parking lot in the HRC-2 zone for use by the proposed park portion of the site. (This action requires approval by the Planning Commission.)

- *Final approval of the Community Priority* designation for the building square footage on the park portion of the site which requires approval by the Planning Commission and City Council.

4.0 Hostel Only Approvals Required

- *Coastal Development Permit, Development Plan Approval* to allow the development of a 75 bed youth hostel with 27 parking spaces at 33 W. Montecito Street. (These actions require approval by the Planning Commission.)

- *Modification* of zoning regulations to allow the first story of the proposed two story youth hostel building to encroach ten feet into the required 20 foot front yard setback at 33 W. Montecito Street. (This modification requires approval by the Planning Commission.)

- *Amendment to California Coastal Commission's Conditions of Approval* on the Red Lion to allow construction of the hostel off-site. (This amendment requires approval by the Planning Commission, City Council and California Coastal Commission.)

IV. ENVIRONMENTAL SETTING

A. PROJECT AREA

1.0 Regional Setting

The proposed project would be located approximately 90 miles north of Los Angeles and approximately 365 miles south of San Francisco, within the City of Santa Barbara. Vehicular access from San Francisco or Los Angeles to the City of Santa Barbara is primarily provided by U. S. Highway 101. The Santa Barbara City Airport is located approximately 13 miles northwest of the proposed project and flights from Los Angeles, San Francisco and Denver arrive at the City Airport on a daily basis. In addition, rail access via Amtrak is provided from the San Francisco area, Los Angeles and San Diego. The City of Santa Barbara acts as Santa Barbara County's Governmental Seat, housing the majority of the County's Governmental Departments, such as the Resource Management Department, Flood Control, etc.

2.0 Local Setting

The City of Santa Barbara's potential for buildout is considered limited, given the current City boundary configurations and existing development. The majority of new development occurring in the City of Santa Barbara consists of the redevelopment of previously developed parcels located within the City limits. A cumulative list of current projects undergoing design/environmental review or construction activities in the general area of the project is provided in Appendix C.

B. PRESENT PHYSICAL SETTING

1.0 Park and Hotel Site

The proposed park and hotel site is located directly north of Cabrillo Boulevard between Santa Barbara and Salsipuedes Streets. The area within the immediate vicinity of the park and hotel site is highly utilized by both residents and tourists, as a result of the large amount of recreational opportunities (public beaches/parks) and the visitor-serving uses located along Cabrillo Boulevard. The project site is depicted as open space within the City of Santa Barbara's General Plan. The General Plan designation for the park and hotel site is Hotel-Related Commercial (HRC-2). However, the majority (approximately 10 acres) of the site is currently governed by an existing Specific Plan which indicates that primary uses for the project site shall be public park and recreational uses. The secondary uses allowed by the Specific Plan are visitor-serving uses in accordance with the Local Coastal Plan designation for "Hotel and Related Commerce II" and recreation and open space facilities in conjunction with parking. In addition, Coastal Commission Conditions of Approval for the adjacent Fess Parker's Red Lion Resort have been placed on the project site which require the development of a low-cost, visitor-serving accommodation (i.e., youth hostel) if the proposed hotel portion of the site.

The proposed park and hotel project site is essentially flat with an average slope of approximately 3%. The park and hotel site is presently developed with two structures (the old City pump and screen plant and the Uptime manufacturing building). The old City pump and screen plant is a permanent structure considered to be of architectural merit, and would remain to be integrated into the proposed park portion of the site. Presently, the old City pump and screen plant provides employees of the City Waterfront Department with offices and storage for equipment associated with the maintenance of the Waterfront Area. The single-story

Uptime industrial building is a temporary structure that would be removed with development of the proposed park and hotel site. Presently, the Uptime building is utilized for the commercial manufacturing of vitamins and natural stimulants.

Vegetation on the park and hotel site consists of 186 trees of 18 different species. More than half of the existing trees are comprised of large Eucalyptus (refer to Appendix J, Tree Management Plan, for additional information on all tree species). There is also a small Riparian habitat located along Laguna Channel.

The proposed park and hotel project site is directly visible from Chase Palm Park and Cabrillo Boulevard (State Route 225), which is designated as a potential Scenic Highway in the City's Scenic Highways Element. In addition, the site can be seen from the Santa Ynez mountains and Riviera neighborhood of the City. Views from the site similarly include both the mountain vistas, Chase Palm Park, the Pacific Ocean and the Channel Islands beyond.

2.0 Hostel Site

The proposed hostel site lies just south of U.S. Highway 101, directly east of the historic Moreton Bay Fig Tree within the City of Santa Barbara. The hostel site is bounded on the north by Montecito Street and on the east by Chapala Street, and is located within the Coastal Zone. The General Plan designation for the hostel site is Hotel and Related Commerce and the zoning designation is HRC-2, S-D-3, Hotel and Related Commerce 2 in the Coastal Overlay Zone. In addition, the proposed hostel site is located within a 100 year flood zone.

The proposed hostel site is comprised of four parcels known as assessor parcel numbers 033-042-01, 02, 03, and 04. The hostel site totals approximately 0.55 acres and is primarily flat. The hostel site has no unique environmental resources and vegetation is limited to ruderal species and five trees situated on the southern boundary of the project site. The site is currently vacant and was last developed with a Shell Oil Company Service Station which was demolished in 1989. The hostel site is visible from U.S. Highway 101, Montecito Street and the historic Moreton Bay Fig Tree. Views observed from the site are primarily of the Moreton Bay Fig Tree, Montecito and Chapala Streets and U.S. Highway 101.

It should be noted that each section in the impact analysis is preceded by an environmental setting description. The reader is referred to these sections for further information pertaining to a specific issue area.

V. LAND USE CONSIDERATIONS

A. OVERVIEW OF EXISTING LAND USES

1.0 Park and Hotel Site

The project site is presently developed with two structures of varying uses and integrity. A single story, industrially-oriented temporary structure is located in the central portion of the site. In the westerly portion of the site, a two story structure (old City Pump House) houses the offices of the City's Waterfront Department. Nearby, the City uses vacant land to store materials used for Stearns Wharf maintenance, as well as life guard stations and other materials related to operations and maintenance activities within the Waterfront Area. These land uses are generally located north of Cabrillo Boulevard and southeast of Carpinteria Street. That area of the site which is north of Carpinteria Street is vacant and undeveloped at this time. The Puritan Ice Company occupied the site in the northeastern portion until it was demolished in 1989. Parking for these existing uses is provided in an informal manner with the exception of the City Waterfront Department, which provides permit parking for City staff.

The City-owned property which lies between Laguna Channel and Santa Barbara Street is vacant. It is occasionally used for storage. In addition, a graveled area immediately east of Santa Barbara Street serves as an informal parking and/or storage area. This area has also served as an area where homeless people congregate. South, across Cabrillo Boulevard, lies Chase Palm Park, an area of high recreational use, particularly in the summer months. The Domingo Art and Crafts Show utilizes the grassy area immediately south of the sidewalk each Sunday to display and market local crafts and art work. In addition, the Cabrillo Boulevard Beachway runs parallel and adjacent to Cabrillo Boulevard throughout the Waterfront Area. Fess Parker's Red Lion Resort lies immediately to the east of the project site. It occupies Parcel "A" of the Specific Plan area and provides visitor-serving lodging facilities and supporting retail and restaurant uses. North of the project site, immediately across the Southern Pacific Railroad Main Line, are industrial uses including the City's Wastewater Treatment Plant and a rock crushing operation. Access across the railroad tracks is presently provided by grade crossings at Santa Barbara Street and Milpas Street. The City plans to extend Salsipuedes Street across the railroad tracks in the near future (see Transportation, Circulation and Parking Section).

The Waterfront Area functions as a major recreational coastal resource. The Harbor area, East Beach and West Beach areas, and Stearns Wharf area provide residents and visitors alike with a range of activities and attractions. The area supports a high concentration of hotels and motels, along with restaurants, open space and retail uses. On and off-street parking is also represented in this area. For a full discussion of the land uses and trends, the reader is referred to the City's Local Coastal Plan.

2.0 Hostel Site

The site of the proposed youth hostel lies at the southeast corner of the intersection of Montecito Street and Chapala Street, near the Moreton Bay Fig Tree. This site is currently vacant. Previously, it served as a Shell service station but this use was removed in 1989. Land uses surrounding the hostel site include U.S. Highway 101 to the immediate north, commercial retail uses to the east and south and open space (Moreton Bay fig tree) to the west. The Southern Pacific Railroad Station lies further to the south. The railway station and related properties have been the subject of a variety of development and preservation proposals over the past decade.

B. DEVELOPMENT TRENDS

Figure V-1 provides an overview of allowed land uses in the vicinity as depicted by the Zoning Map. Figure V-2 is a map of the existing and proposed Specific Plan which governs the proposed park and hotel site. Fess Parker's Red Lion Resort has been developed immediately east of the project site with 360 guest rooms and associated conference facilities. That project is fully operational at this time. The Cabrillo Plaza Specific Plan area lies northwest of the project site. As approved, this plan provides for a 250-room motor hotel, 325-seat quality restaurant, and ocean-oriented industry. It also accommodates the extension of Garden Street through that site to connect and merge with Santa Barbara Street as it intersects Cabrillo Boulevard. This latter project has not been developed at this time; it is unknown when formal development plans will be submitted to the City for review and approval. Further to the west, the City has developed a Harbor Master Plan. This Plan provides for a series of projects which will revitalize the harbor and west beach area with phased circulation, parking and harbor improvements, as well as modest land use intensification such as City use of the Naval Reserve Center. From a City-wide perspective, additional development is limited by public policy relating to resource conservation (see discussion below under City Charter Sections 1507 and 1508).

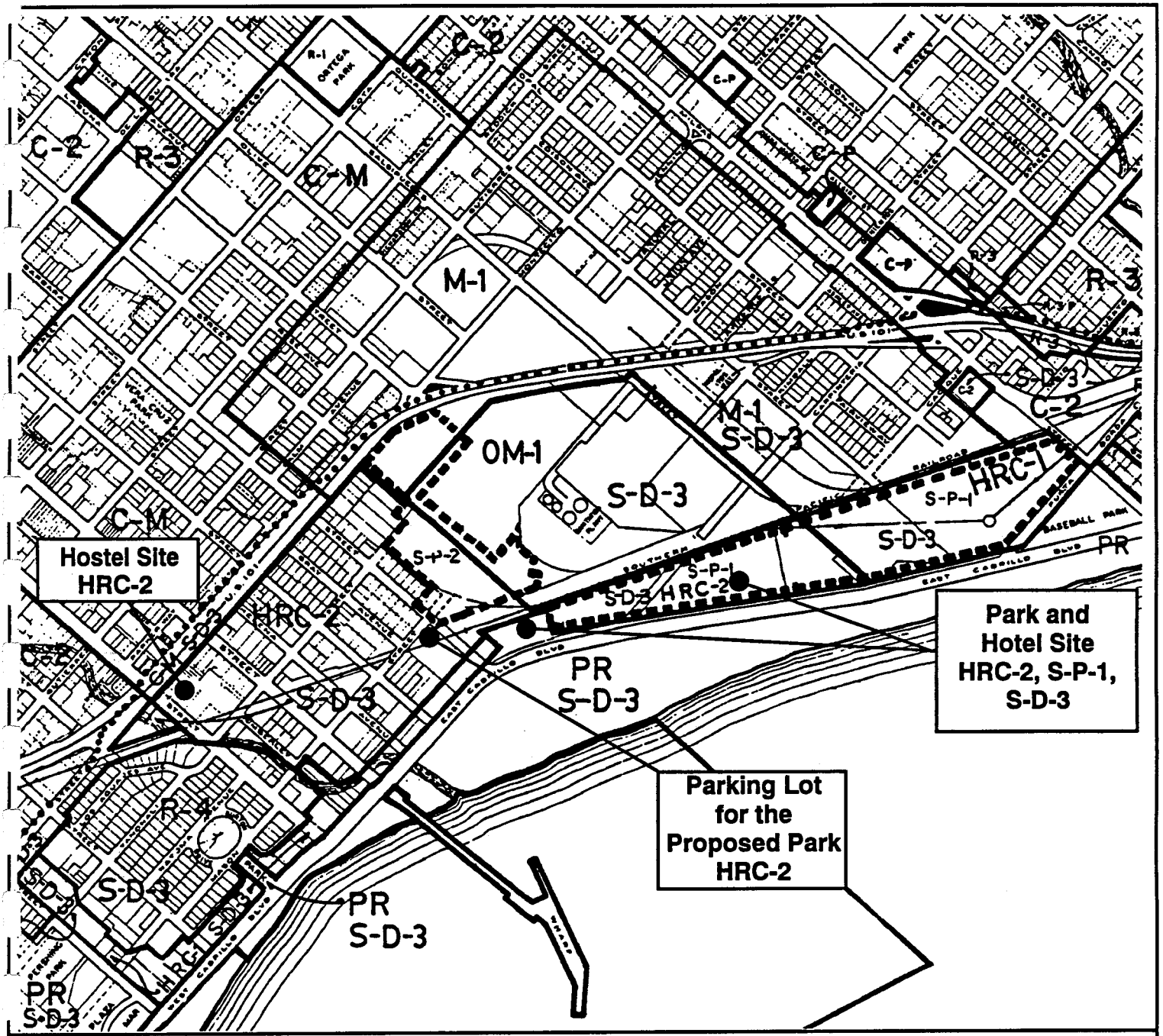
A mitigation measure identified in this EIR to mitigate potentially significant traffic impacts is the extension of Salsipuedes Street across the railroad tracks to create a through road from Cabrillo Boulevard into the Eastside and industrial areas. The extension of Salsipuedes Street was originally identified in the General Plan and would now be implemented prior to operation of the proposed project, if it is approved. The potential impacts of extending Salsipuedes Street are analyzed throughout this EIR in the following sections: Land Use; Traffic, Circulation and Parking; Air Quality; Risk of Upset; Archaeology; and Hazardous Materials/Wastes.

Development plans for the extension of Garden Street have also been prepared by the Engineering Division and submitted to the City Environmental Review section for processing. While the Garden Street extension is not related to this project it would, if approved, allow for approximately 20 additional parking spaces in the immediate area.

From a regional standpoint, the Santa Barbara South Coast is experiencing continuing development pressures from outer continental shelf development of petroleum resources, enrollment increases at the University of California, industrial and commercial development in the Goleta Valley and the City, and residential infill projects throughout the incorporated and unincorporated areas of the South Coast. The California Department of Transportation (Caltrans) has recently completed expansion of U.S. Highway 101 through the addition of one new northbound traffic lane and one new southbound traffic lane between Santa Barbara and Goleta. State Street and Garden Street provide primary access to the Waterfront Area. Caltrans is also proposing to widen U.S. Highway 101 to six lanes from Milpas Street through Montecito to Carpinteria. A Draft EIR/EIS has been prepared for that project.

C. PLANNING AND PUBLIC POLICY ANALYSIS

The following narrative provides a summary discussion and evaluation of the relevant City plans and policies that guide development on the site and its immediate vicinity. This analysis assumes that if the project or a project component is consistent with all relevant policies within an overall goal of the General Plan (e.g., Economic Goals, Resource Goals, etc.) that is also consistent with the goal. Therefore, no analysis of project consistency with General Plan goals has been presented. Policies are presented in italics and are followed by a determination of the project's potential consistency with the quoted policy. A final determination of consistency or inconsistency will be made by the Planning Commission and the City



N

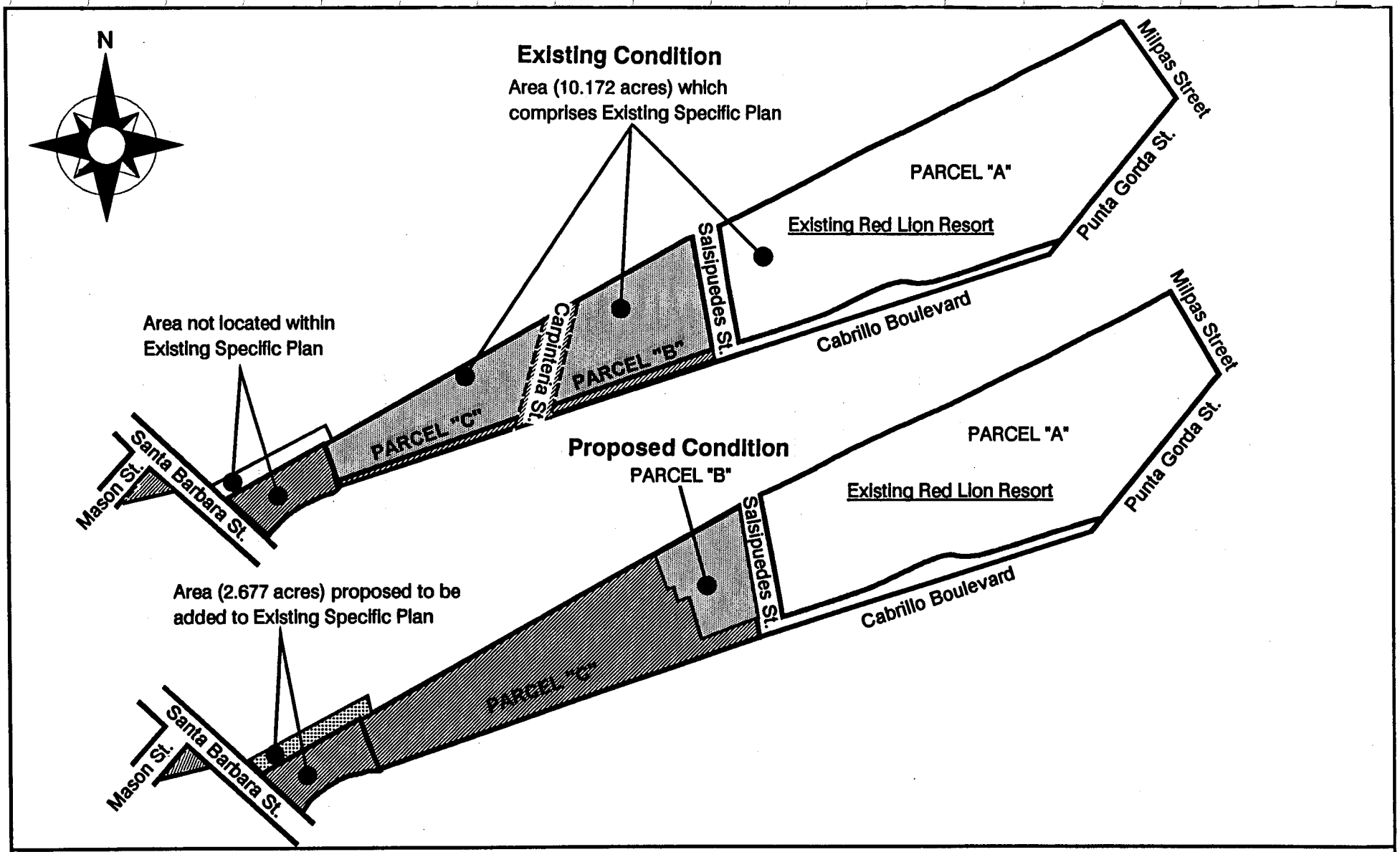
Legend

C-2	Commercial
C-M	Commercial Manufacturing
C-P	Restricted Commercial
HRC-1, HRC-2	Hotel Related Commerce
M-1	Light Manufacturing
OM-1	Ocean Oriented Light Manufacturing
PR	Park and Recreation
S-D-3	Special District-Coastal
S-P-1, S-P-2	Specific Plan Overlay
R-3	Limited Multiple Family Residence
R-4	Hotel Motel Multiple Residence

SCALE 1" = 1,000'
SOURCE: City of Santa Barbara, Land Use Zones, March 1987

FIGURE V-1
ZONING MAP

INTERFACE



LEGEND

Parker Family Trust Ownership

City of Santa Barbara Ownership

Land to be Acquired by the City

NOT TO SCALE

FIGURE V-2

EXISTING/PROPOSED SPECIFIC PLAN MAP

INTERFACE

Council; therefore, the reader is cautioned that the discussion is intended to serve only as a preliminary interpretation of consistency or inconsistency. Table V-1 provides a consistency/inconsistency summary of the policies analyzed herein.

1.0 City Charter Sections

1.1 Charter Sections 1507

On November 2, 1982, voters in the City of Santa Barbara approved Measure K which later became Section 1507 of the City's Charter. This section states:

> *"It is hereby declared to be the policy of the City that its land development shall not exceed its public services and physical and natural resources. These include, but are not limited to, water, air quality, wastewater treatment capacity, and traffic and transportation capacity. All land use policies shall provide for a level and balance of residential and commercial development which will effectively utilize, but will not exhaust, the City's resources in the foreseeable future. In making land use decisions, the City shall be guided by the policies set forth in this Section. In furtherance of these policies, no amendments to the City's General Plan and Zoning Ordinance shall be effective unless approved by five (5) affirmative votes of the City Council. Upon such approval, General Plan and Zoning Ordinance amendments shall be conclusively presumed to comply with the policies set forth herein".*

The proposed Waterfront Park and Hotel is considered to be **potentially inconsistent** with Charter Section 1507 due to the fact that implementation of the proposed project would create significant and unavoidable environmental impacts with regard to long term air quality and noise. Short term impacts with regard to noise, air quality and visual impacts are not considered grounds for a finding of inconsistency with this or other public policy mandates unless those policies relate specifically to short term or construction-related time frames. Consistency with Charter Section 1507 could only be achieved by reducing these environmental impacts below environmental thresholds of significance. For additional information, the reader is referred to the Noise and Air Quality sections, as well as the Alternatives section of this Report. The youth hostel appears to be potentially consistent with this section.

1.2 Charter Section 1508

As a result of the passage of Measure E on November 7, 1989, the City adopted a Charter Amendment for restricting the amount of non-residential growth which can occur over the next twenty years. Charter Section 1508 states:

> *"In furtherance of the policy stated in Section 1507, and to assure that nonresidential development does not exceed the City's water resources, traffic capacity, and affordable housing supply, the City Council shall place the following limits on nonresidential development through adoption of General Plan amendments and subsequent adoption of ordinances and resolutions which are consistent with the General Plan amendments (collectively referred to as "growth limitations" in this section). The growth limitations shall reduce non-residential development from the existing General Plan potential of one hundred, sixteen million (116,000,000) square feet and restrict it to no more than three million (3,000,000) square feet over the next twenty (20) years, commencing January 1, 1990. If the growth limitation ordinances and resolutions have not been*

POLICY SUMMARY MATRIX
Table V-1

Policy Reference	Policy Summary	Juris-diction	Park/Hotel Consistency	Youth Hostel Consistency
Charter Sec. 1507	General Plan and Zoning Ordinance Amendments	City Charter	**Potentially Inconsistent**	Potentially Consistent
Charter Sec. 1508	General Plan and Zoning Ordinance Amendments	City Charter	Potentially Consistent	Potentially Consistent
Land Use Element Policy 1.1	Commercial Growth Cap	City G.P.	Potentially Consistent	Potentially Consistent
Land Use Element Policy 1.3	Developing within resources	City G.P.	Potentially Consistent	Potentially Consistent
Land Use Element Policy 3.1	Provide Funding for growth in Waterfront	City G.P.	Potentially Consistent	N/A
Housing Policy 2.1.0	Developments generating new employment	City G.P.	Undetermined	N/A
Cons. Elem. Cultural Pol. 2.0	Avoid culturally/archaeologically damaging projects	City G.P.	Potentially Consistent	N/A
Cons. Element Vis. Policy 1.0	Protection of creeks and riparian areas	City G.P.	Potentially Consistent	Potentially Consistent
Cons. Element Vis. Policy 3.0	Obstruction of views	City G.P.	Potentially Consistent	N/A
Cons. Element Vis. Policy 4.0	Trees should be preserved	City G.P.	Potentially Consistent	Potentially Consistent
Cons. Element Vis. Policy 5.0	Open Space should be protected	City G.P.	Potentially Consistent	Potentially Consistent
Cons. Element Air Policy 1.0	Reduce trips, increase public transit	City G.P.	**Potentially Inconsistent**	Potentially Consistent
Cons. Element Air Policy 3.0	Promote car pooling/TMIS	City G.P.	**Potentially Inconsistent**	Potentially Consistent
Cons. Element Air Policy 4.0	Discourage uses that degrade air	City G.P.	Potentially Consistent	Potentially Consistent
Cons. Element Bio. Policy 5.0	Preserve habitats and rare species	City G.P.	Potentially Consistent	N/A
Cons. Element Bio Policy 10.0	Maintenance of urban biotic community	City G.P.	Potentially Consistent	Potentially Consistent
Flood Policy 3.0	Hazard reduction programs	City G.P.	Potentially Consistent	Potentially Consistent
Noise Element Policy 4.0	Noise levels should be controlled	City G.P.	**Potentially Inconsistent**	Potentially Consistent
Scenic Hwy. Element	Cabrillo Blvd. is a scenic highway	City G.P.	Potentially Consistent	N/A
Seismic Safety Policy 1.0	Special consideration for Lands with greater potential for ground shaking	City G.P	Potentially Consistent	Potentially Consistent
Seismic Safety Policy 2.0	Seismic investigations should be done	City G.P.	Potentially Consistent	Potentially Consistent
S.S. Liquefaction Policy 1.0	Liquefaction evaluations should be made by qualified engineers	City G.P.	Potentially Consistent	Potentially Consistent
S.S. Tsunami Policy 4.0	Familiarize the public of tsunami potential	City G.P.	Potentially Consistent	Potentially Consistent
S.S. Seiche Policy 1.0	Seiche potential should be considered in all waterfront/harbor development areas.	City G.P.	Potentially Consistent	N/A
S.S. Groundwater Policy 1.0	Soils investigations should occur where high groundwater is present	City G.P.	Potentially Consistent	Potentially Consistent
S.S. Flooding Policy 1.0	Enforce adequate creek setbacks	City G.P.	Potentially Consistent	Potentially Consistent

POLICY SUMMARY MATRIX
Table V-1

Policy Reference	Policy Summary	Juris-diction	Park/Hotel Consistency	Youth Hostel Consistency
S.S. Flooding Policy 4.0	Light intensity use shall be encouraged in the floodway	City G.P.	Potentially Consistent	Potentially Consistent
Circulation Elem. Policy 1.3	New Development shall not constrain intersection levels of service	City G.P.	Potentially Consistent	Potentially Consistent
Circulation Elem. Policy 2.1	Adequate offstreet parking shall be provided	City G.P.	**Potentially Inconsistent**	Potentially Consistent
Circulation Elem. Policy 3.1	City shall facilitate the use of the bicycle as a significant mode of transportation in the City	City G.P.	Potentially Consistent	Potentially Consistent
Circulation Elem. Policy 3.2	City shall provide safe system for pedestrians and handicapped	City G.P.	Potentially Consistent	Potentially Consistent
Circulation Elem. Policy 3.3	City shall encourage public and private transportation modes	City G.P.	Potentially Consistent	Potentially Consistent
Circulation Elem. Policy 3.4	City shall encourage ride share	City G.P.	Potentially Consistent	Potentially Consistent
LCP Visual Quality Policy 3	New development shall not obstruct scenic view corridors	LCP	Potentially Consistent	Potentially Consistent
LCP Recreation Policy 3.2	City shall seek public and private land dedications for recreational uses	LCP	Potentially Consistent	N/A
LCP Recreation Policy 3.3	Dev. in the coastal zone shall provide adequate parking for rec. uses	LCP	**Potentially Inconsistent**	N/A
LCP Recreation Policy 3.4	New recreational dev. in the coastal zone which may create traffic impacts shall mitigate with TSMP measures	LCP	Potentially Consistent	N/A
LCP Recreation Policy 3.6	The City shall consider expansion of parking and open space at Palm Park	LCP	Potentially Consistent	N/A
LCP Recreation Policy 3.7	City shall be selective in rec. events in the coastal zone to prevent traffic impacts in the area.	LCP	Potentially Consistent	N/A
LCP Recreation Policy 3.8	City to reconsider location of Sunday arts show to be north of Cabrillo	LCP	Potentially Consistent	N/A
LCP Recreation Policy 3.13	Developers required to provide rec. open space and parking inland from Cabrillo	LCP	Potentially Consistent	N/A
LCP Visitor Serving Policy 4.1	Preserve & encourage visitor serving uses	LCP	Potentially Consistent	N/A
LCP Visitor Serving Policy 4.2	Visitor serving development shall be allowed if it meets certain criteria	LCP	**Potentially Inconsistent**	Potentially Consistent
LCP Visitor Serving Policy 4.4	Hotel/Motel dev. shall provide a range of room prices and lower price services	LCP	Potentially Consistent	Potentially Consistent
LCP Visitor Serving Policy 4.6	The Southern Pacific Prop. shall be planned for visitor-serving uses	LCP	Potentially Consistent	N/A
LCP Housing Policy 5.5	20% of Tax Increment monies dedicated to low & Mod. housing in Coastal Zone	LCP	Undetermined	N/A
LCP Marine and Water Policy 6.1	City shall protect and enhance biotic resources	LCP	Potentially Consistent	N/A
LCP Marine and Water Policy 6.8	Riparian resources in the coastal zone shall protected and enhanced	LCP	Potentially Consistent	N/A
LCP Marine and Water Policy 6.9	City shall support Regional WQCB on management of watersheds	LCP	Potentially Consistent	Potentially Consistent
LCP Marine and Water Policy 6.10	Setbacks from top of bank are required	LCP	Potentially Consistent	N/A
LCP Visual Policy 9.1	Views to and from ocean shall be protected	LCP	Potentially Consistent	N/A

POLICY SUMMARY MATRIX
Table V-1

Policy Reference	Policy Summary	Juris-diction	Park/Hotel Consistency	Youth Hostel Consistency
LCP Visual Policy 9.3	Dev. in the coastal zone shall provide underground utilities	LCP	Potentially Consistent	Potentially Consistent
LCP Visual Policy 9.5	Parking facilities shall be screened from public view	LCP	Potentially Consistent	Potentially Consistent
LCP Pub.Ser. Policy 11.5	Waterfront new dev. shall provide adequate parking	LCP	**Potentially Inconsistent**	N/A
LCP Pub.Ser. Policy 11.7	Dev. on So. Pacific site shall provide replacement spaces if sparking is eliminated on Carpinteria Street	LCP	**Potentially Inconsistent**	N/A
LCP Pub.Ser. Policy 11.11	Ride-sharing and car-pooling are encouraged in waterfront	LCP	Potentially Consistent	N/A
LCP Pub.Ser. Policy 11.15	Pedestrian safety encouraged in waterfront	LCP	Potentially Consistent	N/A
LCP Land Use Policy 12.2	Impact of development on openness, congestion, naturalness & rhythm	LCP	Potentially Consistent	Potentially Consistent
Section 30212.5-Access	Parking facilities shall be provided	Coastal Act	Potentially Consistent	Potentially Consistent
Section 30213-Access	Lower cost Visitor and Rec. uses shall be encouraged	Coastal Act	Potentially Consistent	Potentially Consistent
Section 30221-Recreation	Oceanfront land suitable for rec. uses shall be protected for such uses	Coastal Act	Potentially Consistent	N/A
Section 30222-Recreation	Private lands suitable for rec. and public beach access shall have priority	Coastal Act	Potentially Consistent	N/A
Section 30230-Marine Env.	Marine resources shall be protected and enhanced	Coastal Act	Potentially Consistent	N/A
Section 30231-Marine Env.	Marine waters shall be maintained, protected	Coastal Act	Potentially Consistent	N/A
Section 30240-Land Resources	ESH's shall be protected	Coastal Act	Potentially Consistent	N/A
30244-Land Resources	Mitigation shall be prescribed to reduce archaeological impacts	Coastal Act	Potentially Consistent	N/A
Section 30251-Development	Scenic and visual resources shall be protected	Coastal Act	Potentially Consistent	Potentially Consistent
Section 30252-Development	Provide access to coast - adequate parking facilities	Coastal Act	**Potentially Inconsistent**	Potentially Consistent
Section 30253-Devipment 1,2,4,5	New development must meet safety standards listed in this policy	Coastal Act	Potentially Consistent	Potentially Consistent
Section 30253-Development 3	New development must be consistent with requirements imposed by Air Resources Board	Coastal Act	**Potentially Inconsistent**	Potentially Consistent
Section 30254-Development	Infrastructure shall be provided for new development	Coastal Act	Potentially Consistent	Potentially Consistent
Coastal Comm. Conditions of Approval	Uses which can occur on the Site and requirements of this project	Coastal Com-mission	Potentially Consistent	Potentially Consistent
Specific Plan Conditions of Approval	Uses which can occur on the site and requirements of this project	City Council	**Potentially Inconsistent**	Potentially Consistent

adopted by January 1, 1993, no further projects shall be approved until after said ordinances and resolutions are adopted.

"(a) Limitations on New Development. The growth limitations shall restrict nonresidential development (including pending and approved projects) over the next twenty (20) years to no more than three million (3,000,000) square feet above the October 1988 baseline condition. This allowable square footage shall be allocated as follows:

Category	*Square Footage*
Approved Projects	*900,000*
Pending Projects	*700,000*
Vacant Property	*500,000*
Small Additions	*600,000*
Community Priorities	*300,000*
TOTAL:	*3,000,000*

"This limitation shall be implemented by zoning ordinance amendments, parcel rezoning, a project evaluation system, a floor area ratio ordinance and other appropriate means to reduce or restrict the zoning to allow a maximum of three million (3,000,000) additional square feet above the October, 1988, baseline condition at full buildout. The balance of any square footage which is not utilized in any category shall be either (i) set aside for possible use after twenty (20) years, or (ii) used during that twenty (20) year period for a project approved by the voters. Small additions will be limited to no more than thirty thousand (30,000) square feet annually.

"(b) Traffic, Water and Affordable Housing Resources. The growth limitations shall provide that a new or pending nonresidential project may be constructed only if it will not cause a significant and unmitigated adverse impact on any of the following:

1. *The City's water resources.*
2. *Traffic within the City.*
3. *The supply of affordable housing in the City and South Coast area.*

"A finding shall be made that resources will be available and traffic improvements will be in place at the time the project is ready for occupancy.

"(c) Community Priority Projects. Community Priority Projects are those which are found by the City Council as necessary to meet present or projected needs directly related to public health, safety or general welfare. Such projects shall not be subject to the provisions of Subsection (b)."

Interim limitations were also instituted until long-term growth limitations were actually adopted. At this point in time, the long-term growth limitations are in effect.

The proposed Waterfront Park and Hotel component of the project is deemed potentially consistent with this Charter section because of the lack of significant and unmitigated impacts on water resources, traffic impacts and affordable housing (see Growth Inducement section). This potential consistency finding

assumes that Salsipuedes Street is extended prior to issuance of certificates of occupancy and that the City and Caltrans can formally agree upon and implement improvements to the intersection at Cabrillo Boulevard and U.S. 101 as a mitigation measure for this project. If these collective improvements are not capable of being carried out, the project would result in significant unavoidable adverse impacts and could not be approved under this Charter Section. The new floor area of the hotel component qualifies as a "pending project" under Charter Section 1508 due to its location within the Specific Plan which governs both the Parker Family Trust portion of the site (parcels "B" and "C") and the Red Lion Resort. This Specific Plan is covered under the Pending Project category because some of the major public improvements are tied to the development of parcels B and C; therefore the improvements were not completed in time to qualify the Specific Plan as an Approved Project. Additional square footage for park facilities has received a preliminary designation as a "Community Priority" by the City Council.

The youth hostel project component was also a part of the conditions of approval of the Specific Plan for parcels "B" and "C". The youth hostel does not result in any significant or unmitigatable adverse environmental impacts on traffic, water resources, or affordable housing and is therefore considered potentially consistent with this policy. However, the square footage for the hostel would come from the Small Additions category based on the development of the four separate parcels involved and the previously existing automobile service station.

2.0 General Plan Elements

The City's General Plan contains a number of elements that specify policies which relate to both the Waterfront Park and Hotel and youth hostel. A brief discussion of applicable policies is provided below. Table 5 summarizes the project's anticipated consistency or inconsistency with adopted public policy.

The reader should be aware that the Local Coastal Plan supersedes and refines the General Plan for those areas within the City which lie in the Coastal Zone. Where elements of the General Plan do not specifically refer to the project site, the reader should consider the language of the Coastal Plan as providing additional specificity and policy direction. In the interests of full disclosure, this report attempts to provide a full discussion of both the City General Plan and the Coastal Plan.

There are several "Principles" of the General Plan with which the Waterfront Park and Hotel component and to a lesser degree the youth hostel is expected to dovetail. While not policies requiring consistency findings, they are mentioned here for their policy context.

Principle 5	*The community must select and promote its economic base in a manner responsive to these principles as well as to the fact that the community must exist rationally within the overall economic system of which it is a part.*
Principle 8	*It is essential to protect the historic, architectural, and natural qualities of Santa Barbara's environment and to preserve the ecological balance of all life systems with which we coexist.*
Principle 9	*The provision of a diverse circulation and transportation system, wholly responsive to these principles, is a necessary function of government.*

The proposed Waterfront Park and Hotel component of the project is considered to further these principles through site design and project definition.

2.1 Land Use Element

The Land Use Element is comprised of two components, the Land Use Map and accompanying text. The Land Use Map designates the hotel and park site as open space with a public parking overlay symbol. The intent of these designations was to guide development of the site if it were acquired and developed by a public entity, which is partly the case at present. For the privately developed component (luxury hotel), the language in the accompanying text applies only to the provision of replacement parking for those on-street spaces which are removed by the project. Because no on-street spaces are removed by the luxury hotel portion of the site, the project is potentially consistent with this Land Use policy. As portions of this policy are superseded by LCP Land Use policy, the reader is referred to the LCP language discussed in subsequent portions of this section.

The text of the updated Land Use Element provides general land use policy guidance. In addition to this text, there are specific land use policies which apply to the Waterfront Park and Hotel component. (No land use policies refer specifically to the hostel site.)

2.1.1 Hotel and Residential - Text Discussion

Tourism is essential to the economy of Santa Barbara. In order to enhance tourism, the General Plan has recommended, since 1964, that the area of the City known as East Beach [defined as the area bounded by Highway 101 on the north, Cabrillo Boulevard on the south, by Santa Barbara Street on the west and the City limits on the east] be set aside for Hotel and Residential development. Although currently being used for general commercial and industrial activity, this beachfront area is far more suitable for tourist, recreation, and residential activities. The railroad yards and mainline, and most of the commercial and industrial uses now located within the East Beach neighborhood must eventually be relocated so that this area of Santa Barbara can be converted to proper shoreline-oriented uses.

2.1.2 Land Use Element Policies

Policy 1.1 *A nonresidential growth cap from 1990 until 2010 of three (3) million square feet has been established. Any development carried out under the Growth Cap shall be contingent upon the availability of resources. The three (3) million square feet of nonresidential development potential shall be allocated to the following five (5) categories:*

Category	*Square footage*
Approved Projects	*900,000*
Pending Projects	*700,000*
Vacant Property	*500,000*
Small Additions	*600,000*
Community Priorities	*300,000*
Minor Additions	*Exempt*

As noted in the discussion of Charter Section 1508, the Waterfront Park and Hotel component is potentially consistent with this policy because it is part of a Specific Plan that is considered a Pending Project. In addition, the building square footage in the park portion of the site has received a preliminary designation as a "Community Priority" by City Council. The youth hostel is also potentially consistent because it falls within the category of Small Additions.

Policy 1.3 *Any new or pending non-residential project may be constructed only if it will not cause a significant and unmitigated adverse impact on any of the following:*

- *The City's water resources.*
- *Traffic within the City.*
- *The supply of affordable housing in the City and South Coast area.*

A finding must be made that resources will be available and traffic improvements will be in place at the time the project is ready for occupancy.

As noted earlier, neither the proposed Waterfront Park and Hotel nor the youth hostel would result in any significant, adverse and unmitigated impacts on water supply, traffic congestion or affordable housing demand. However, a finding of potential consistency with Policy 1.3 is predicated on the extension of Salsipuedes Street and installation of traffic signals at Cabrillo/U.S. Highway 101 off/on ramps being in place and operational prior to the issuance of certificates of occupancy for any structures.

Policy 3.1 *Provide funding opportunities for growth and rehabilitation in the Downtown and Waterfront Areas of the City in order to maintain, protect and enhance the City's important retail and visitor-serving uses.*

The proposed Waterfront Park and Hotel is located within the Central City Redevelopment Area and would generate significant amounts of tax increment revenues and transient occupancy tax revenues. As a result, the project is considered to be potentially consistent with Policy 3.1.

Additional Land Use policies which relate to the project site are contained within the City's Local Coastal Plan; project consistency with these policies is discussed below.

2.2 1985 Housing Element Update

The principal Housing Element policy which relates to the proposed project addresses the issue of housing demand.

Policy 2-1.0 *Developments generating new employment from outside the South Coast Area shall be in balance with available housing resources at prices affordable to the projected new employees who will be moving into the area.*

As noted in the Growth Inducement section of this EIR, the proposed project would generate a demand for 22 affordable housing units. The proposed project is required to provide affordable housing to offset the additional affordable housing demands which it would create (from new-comers to the area), either through development of housing on-or off-site or the payment of an in lieu fee as outlined in Santa Barbara Municipal Code Section 28.87.300. Although the applicants have indicated a willingness to meet the provisions of this ordinance, they have not demonstrated how they will comply. Therefore, it is undetermined whether or not the project is potentially consistent with this policy.

2.3 Conservation Element

2.3.1 Cultural and Historic Resources

Policy 2.0 *Activities and development which could damage or destroy archaeological, historic, or*

architectural resources are to be avoided.

The proposed project is potentially consistent with Cultural Policy 2.0 because its design is not anticipated to result in adverse or significant impacts to the Shore Acres site or the City Pump and Screen Plant (see Cultural Resources and Historic Resources sections). This policy consistency determination is based upon the findings of a Phase II archaeological study, conducted as part of this EIR.

2.3.2 Visual Resources

Policy 1.0 *Development adjacent to creeks shall not degrade the creeks or their riparian environments.*

The proposed park portion of the site would encompass the portion of Laguna Channel which bisects the park site. Given the existing poor condition of this portion of Laguna Channel, the proposed park's revitalization of this portion of the creek, and the project's design elements for creation of wetlands and water elements, the proposed project would be considered potentially consistent with this policy.

The youth hostel component of the project would not result in any adverse biological or visual impacts to nearby Mission Creek. Therefore, that component would also be potentially consistent with this policy. (See discussion under Biological Resources.)

Policy 3.0 *New development shall not obstruct scenic view corridors, including those of the ocean and lower elevations 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 proposed hotel portion of the site would encroach upon an existing scenic view corridor which would result in the blocking of a portion of the existing views of the Riviera. However, the location of the hotel portion of the site in relationship to other open space portions of the site (which would be improved through tree replanting and canopy modification) and the preservation of the Salsipuedes Street view corridor would mitigate the potential inconsistencies with this policy. For additional information, the reader is referred to the Aesthetics/Visual Resources section of this EIR. In conclusion, the proposed hotel portion of the site would be considered potentially consistent with this policy.

Policy 4.0 *Trees enhance the general appearance of the City's landscape and should be preserved and protected.*

Development of the proposed park and hotel site would include the removal of 98 existing trees/shrubs. However, the proposed park and hotel site would also include the planting of 441 new trees, which would create a net increase of 343 trees on the park and hotel site. Therefore, the proposed park and hotel site would be considered potentially consistent with this policy. Construction of the youth hostel is not anticipated to threaten the Moreton Bay Fig Tree and is therefore considered potentially consistent with this policy.

Policy 5.0 *Significant open space areas should be protected to preserve the City's visual resources from degradation.*

Development of the proposed park and hotel site would consist of approximately 10 acres of public park and a 150 room hotel on 3 acres of the 13 acre project site. Although the majority of the site is considered

open space, a large portion (approximately 5 acres) of the site is encompassed within a chain link fence and currently provides storage area for a number of commercial uses. Because the proposed park portion of the site would entail the removal of this visually degraded storage area and would provide 10 acres of usable public open space, development of the proposed park portion of the site would be considered potentially consistent with Policy 5.0 of the Conservation Element. The underlying zoning on the property is HRC-2 and the large majority of public and privately owned land will be developed as recreational open space. Therefore, development of the proposed hotel portion of the site on the easterly 3 acres of open space, when taken together with the park uses, would be considered potentially consistent with the intent of this policy.

The youth hostel component would not result in any potential inconsistencies with visual policies because of its inland location. While many views of the mountains are available to visitors to the Moreton Bay Fig Tree park, the tree's predominance overshadows the significance of the construction of a two-story structure at the site of a former gas station. From the perspective of views to the Moreton Bay Fig Tree by westbound Montecito Street travelers, the proposed setback modification would not result in any potential policy inconsistencies. This is due to the line of sight of westbound travelers being sufficiently north of the building. For additional information, the reader is referred to the Visual and Aesthetic Impacts section of the report.

2.3.3 Air Quality

Policy 1.0 *Reduce single occupant automobile trips and increase the utilization of public transit.*

Policy 3.0 *Promote the use of car pooling through special provisions for the priority use of parking facilities and other employee disincentives to auto traffic in commercial areas (per TMIS) as an alternative to construction of additional parking facilities.*

The proposed project is considered **potentially inconsistent** with Air Quality Policies 1.0 and 3.0 due to its lack of specific transportation systems management programs into the project. In order to achieve consistency with these policies and a mitigation measure in the Air Quality section, the project should prepare a Transportation System Management Program (TSMP) which specifically addresses incentives and disincentives to the single occupant auto, and provides for an Alternative Transportation Coordinator (ATC). Quarterly and yearly monitoring reports should be required to ensure program effectiveness and to provide an appropriate enforcement mechanism. By its location adjacent to the railway station and its programmatic intent of accommodations focused on visitors using alternative modes of transportation (rail, bicycle, etc.), the hostel is potentially consistent with these policies.

Policy 4.0 *Discourage and where possible prohibit land uses which unnecessarily contribute to air quality degradation.*

While implementation of the Waterfront Park and Hotel component would exceed identified short-term and long-term air quality thresholds, implementation of the mitigation measures proposed within this EIR would lessen air quality degradation to the greatest degree feasible. With these mitigations and the requirement of implementing a TSMP (discussed above), the project would be considered potentially consistent with this policy. Other land uses allowed by the Specific Plan and underlying zoning would not necessarily result in a substantially smaller contribution to air quality degradation (see Alternatives section).

2.3.4 Biological Resources

Policy 5.0 *The habitats of rare and endangered species shall be preserved.*

There are no rare or endangered species on either parcel proposed for development. The Waterfront Park component would preserve and enhance the majority of the site through sensitive landscape planning and riparian habitat restoration. Incorporation of the mitigation measures recommended in the Biological Resources section of this EIR would preclude potential inconsistencies with this policy. See discussion under Biological Resources Section.

Policy 10.0 *Programs shall be developed to maintain a productive urban biotic community.*

The landscape planning and biological/botanical habitat restoration proposed for the Waterfront Park component would further this policy and would ensure the project's potential consistency with it. With regard to the proposed hostel, the Moreton Bay Fig Tree overhangs the site. In order to minimize any potential damage to this landmark tree, the recommendations of the Arborist's report prepared on the tree should be followed (see Biological Resources). In this regard, the hostel is potentially consistent with this policy.

2.3.5 Drainage and Flood Control

Policy 3.0 *Hazard reduction programs shall be implemented in urban sections of the City already built in hazardous flood-prone areas.*

The Waterfront Park and Hotel and youth hostel components each propose to elevate finished floor levels above the surface water elevation of the 100-year flood plain. Therefore, the project is considered potentially consistent with this policy. The subterranean level will not be elevated above the flood plain. However, the elevation of the driveway into the parking area is above the 100 year flood plain which will minimize flooding potential.

Policy 4.0 *Goals and policies of this element are interrelated with those of the Safety and Open Space Elements and shall be considered together in land use planning decisions.*

See discussion below under subsection 2.6.

2.4 Noise Element

Noise exposure criteria for a variety of land uses are contained in Table 3, Summary Land Use Compatibility Standards, of the Noise Element. In order to achieve consistency with the Noise Element guidelines, noise levels must be attenuated to specified levels. The various noise standards and applicable thresholds are discussed in the Noise and Vibration section of this EIR. The development of the Waterfront Park and Hotel and Youth Hostel as proposed would result in noise impacts on the users above the City thresholds. However, if the mitigation measures required in the Noise and Vibration section are implemented, the project noise impacts would be reduced to conform with the City's requirements. Therefore, the entire project, with one exception, would be considered potentially consistent with this element if the required mitigation measures are included in the project design.

The one project component that is in question is development of the park portion of the site. The Noise Element specifies a "normally acceptable" maximum noise exposure level of 65 L_{dn} (DNL) for "playgrounds [and] neighborhood parks." Other Land Use Categories that are related to park uses include:

Land Use Category	Maximum Normally Acceptable DNL
Sports Arenas, Outdoor Spectator Sports	65
Golf Courses, Riding Stables, Water Recreation, Cemeteries	70
Extensive Natural Recreation Areas	75

It is clear, in reviewing this list, that there are questions about whether the proposed park fits into any of the Land Use Categories outlined in the Noise Element. The one clear park category is for "playgrounds [and] neighborhood parks." Neighborhood parks are normally in residential areas where noisy activities are, and should be, limited in order to remain generally compatible with acceptable noise levels in residential areas (maximum "normally acceptable" DNL is 60). The proposed park would be an "urban park." It would be part of a larger regional/community park in an urban setting and surrounded by transient lodging and commercial uses and activities (maximum "normally acceptable", 75-80 DNL). As neighborhood park noise compatibility guidelines reflect the residential uses surrounding such parks, so urban park noise standards should reflect the surrounding commercial uses. Because urban parks are not included in the Land Use Compatibility Guidelines in the Noise Element, the policy does not apply to this component of the project.

The youth hostel appears to be potentially consistent with this Element if the mitigation measures required in the Noise and Vibration section are implemented.

2.5 Scenic Highways Element

Cabrillo Boulevard is designated a potential Scenic Highway in the Scenic Highways Element of the General Plan. Land use controls embodied within the Local Coastal Plan are limited with regard to this particular site. The Scenic Highways Element provides general direction for planning, land use controls, design, and maintenance standards for the hotel and park site, as quoted below:

> *"Along with other points of interest in the City, Cabrillo Boulevard is a major tourist attraction and is designated for preservation as an urban scenic highway for visitors and residents. Land use regulations consistent with the policies of the General Plan should be in effect over the entire corridor ... Although there are height restrictions for hotel and motel development, setback requirements are minimal. Because the [Waterfront Park and Hotel site] is a prime site for some type of hotel facility, it is recommended that appropriate setback requirements be established, and that a height-setback relationship be created in such a manner that any future development does not obstruct views of scenic resources or infringe on the open quality of the corridor. In addition to setbacks, it is recommended that building separations be required to provide significant open spaces and to control the intensity of development. Excellence in landscape, architectural, and construction designs should be encouraged for this hotel site, as well as for the proposed redevelopment of Stearns Wharf. Both facilities must be considered visually important elements within the highway corridor, and should therefore be in keeping with the cityscape and skyline. Along with any other commercial development on Cabrillo Boulevard, these facilities should reflect the density, tempo, and activities of the population...*

"The essence of Cabrillo Boulevard as a scenic drive is its proximity and exposure to the shoreline. The City is considering enhancing the shoreline through the expansion of Palm Park in order to provide recreational features such as bikeways, walkways, picnic areas, and parking areas within uncrowded, generous spaces. The park is heavily used on the weekends, and additional space is necessary to reduce the density.

"In order to accomplish this expansion, it has been suggested that the beach area beyond Palm Park be widened. Methods to expand oceanward, to the south, should therefore be investigated. Such an expansion could also be accomplished by widening the Park northward. This latter type of expansion requires the realignment of Cabrillo Boulevard. The designation of a scenic highway is based on that which can be seen by the traveler in relation to the corridor adjacent to the highway. Therefore, adequate standards for the planning, location, and design of the Cabrillo Boulevard realignment, if that occurs, should be applied in order to take advantage of the best scenic values within the corridor."

The Scenic Highways Element as presently written does not contain any explicit policy language other than that mentioned above. The open space of the proposed park, the hotel setbacks and the hotel portion of the site building separations are generally consistent with the recommendations of this Element. Provision of walkways, picnic areas and parking would enhance the recreational opportunities in the Waterfront Area and would also serve users of Chase Palm Park which is heavily frequented. While the project as proposed is generally consistent with this language, it is the Local Coastal Plan and the Specific Plan which provide additional guidance with regard to these issues. The reader is directed to those discussions later in this analysis.

2.6 Seismic Safety and Safety Element

The proposed project will be subject to a number of technical conditions relative to foundation design and other factors. The following policies apply to the proposed project and are provided as general reference.

2.6.1 Seismic Safety - Ground Shaking

<u>Policy 1</u> *Given that the possibility for greater ground shaking potential exists in some areas (i.e., filled estero lands) for larger structures, these areas should be given special consideration.*

<u>Policy 2</u> *Specific seismic investigations shall be conducted by appropriate consultants (engineering geologist, geophysicist, structural engineer, etc.) for all public buildings, disaster response facilities, schools, etc., and any structure over three stories in the filled estero or thicker alluvium areas as shown on the Seismic Hazard Map.*

2.6.2 Liquefaction

<u>Policy 1</u> *Liquefaction evaluations and recommendations should be made by a qualified soils engineer for all new major or public structures located in high or conditional liquefaction potential areas (shown on the Liquefaction Hazard Map) whose failure could result in loss of life or high monetary loss.*

2.6.3 Tsunami

Policy 4 *Familiarize the general public located in tsunami hazard areas with the nature and extent of the tsunami hazard and with warning and evacuation procedures. This may be done through mailings, news media, public service announcements, and adult education.*

2.6.4 Seiche

Policy 1 *To reduce the potential impact of seismically induced seiches, the seiche hazard should be considered in all development within areas near open bodies of water and the harbor.*

2.6.5 High Groundwater

Policy 1 *In areas where near-surface groundwater is present or where historic high groundwater levels could return to their previous high levels, soils engineering and foundation studies shall be conducted to determine what engineering measures would best mitigate any potentially adverse impacts.*

2.6.6 Flooding

Policy 1 *Establish and enforce adequate creek setbacks or buffer zones to protect new development from flood and erosion hazards.*

Policy 4 *Encourage light intensity use in the floodway or floodway fringe with the requirement that such uses shall not impair the flood-carrying capacity of the stream.*

A preliminary geotechnical report has been prepared and includes recommendations for grading, compaction, liquefaction and construction techniques. These recommendations have been incorporated into the project description as mitigation measures (see Appendix A, Initial Study). In addition, mitigation measures related to geologic processes were incorporated into the Specific Plan. A soils report will be required for the youth hostel when a building permit application is submitted to the Division of Land Use Controls (DLUC) and the recommendations of that report will be required to be included in the building plans. Monitoring of construction will be handled by the DLUC to ensure compliance with all required measures. The proposed project is therefore considered potentially consistent with the policies stated above.

2.7 Circulation Element

Policy 1.3 *Maintenance of acceptable levels of service at City intersections shall be the key criterion for evaluation of new development proposals. The upper limit of the level of service "C" range (maximum volume-to-capacity ratio of 0.80 or no more than 25.0 seconds average stopped delay per vehicle) is defined as the maximum acceptable operating conditions during peak hours at signalized intersections. New developments are only appropriate where they can be implemented without degrading operating conditions at any intersection below level "C", or where reasonable and enforceable mitigation measures can be implemented by the development to meet these level of service goals.*

The Waterfront Park and Hotel component has the potential to degrade certain intersections in the project

vicinity. However, because of the Salsipuedes Street extension, existing levels of service and signalized intersection performance would not be degraded below existing operating conditions. With the street extension, the Milpas Street cumulative operating conditions (with the proposed project) would operate better than existing conditions at all intersections except for the Milpas/Highway 101 NB Ramps-Carpinteria intersection. This intersection would continue to operate above City standards but construction of the street extension would improve intersection performance over existing levels. Therefore, the proposed hotel and park are potentially consistent with this policy. The youth hostel appears to be potentially consistent with this policy also.

Policy 2.1 *The City shall ensure that new developments, including those projects which involve a change of use, provide for adequate off-street parking to satisfy their parking demands that are unmet by other parking programs. In reviewing parking requirements, structures designated as Landmarks or Structures of Merit shall be given special consideration and individualized Transportation System Management programs shall be an option. The City shall also ensure that the developments provide for the implementation of programs to encourage the use of alternative modes of transportation.*

The proposed Waterfront Park and Hotel component is **potentially inconsistent** with several aspects of this policy. From a technical standpoint, the hotel and related uses do not provide sufficient parking to meet demand requirements. The hotel may seek a supplementary agreement with the Red Lion Resort to utilize its excess parking spaces. If it does or if it provides other off-site parking necessary to meet demand, the project would be potentially consistent with this aspect of the policy. Secondly, the proposed project does not provide for a transportation management program as required by this policy. However, such a program is required as a mitigation measure and if it is implemented, this project would be potentially consistent with this policy. Finally, because there is a parking impact from the park, this component of the project is also **potentially inconsistent** with this policy until such time as Garden Street is extended. The youth hostel appears to be potentially consistent with this policy.

Policy 3.1 *The City shall facilitate the use of the bicycle as a significant mode of transportation in the City.*

The proposed project is considered potentially consistent if the transportation system management plan required as a mitigation measure is implemented.

Policy 3.2 *The City shall provide for a safe and convenient circulation system for pedestrians which is also accessible to handicapped, elderly and blind individuals.*

The circulation system envisioned by the project is potentially consistent with the intent of this policy through the provision of an integrated walkway system within the proposed park and hotel site.

Policy 3.3 *The City shall encourage the coordination of public and private transportation modes in a coordinated and efficient transportation system.*

Policy 3.4 *The City shall encourage an aggressive ride sharing program and other mechanisms to reduce dependence on single-occupant automobiles as a primary transportation mode.*

The proposed project is considered potentially consistent with these policies if the transportation system management plan required as a mitigation measure is implemented.

2.8 Open Space Element

There is no specific reference within the Open Space Element to the subject property. However, the Element does contain the following language related to shoreline protection:

> *"The preservation of the shoreline as an open space will require care in the types of improvements that are allowed to be sure that the natural qualities are not destroyed or obscured ... excessive development for one particular group of users could easily deprive the community as a whole of the shoreline as open space."*

The proposed project seeks to satisfy the needs of a variety of user groups and sets aside a significant amount of coastal-oriented open space. Therefore, the proposed project is considered to be potentially consistent with this Element.

2.9 Parks and Recreation Element

There is no specific reference to the project site within the text of the City's Parks and Recreation Element. However, the Parks and Recreation Facilities Programming Master Plan does address the project site. This Master Plan proposes the expansion of Chase Palm Park by up to 4.6 acres and identifies it as a number one neighborhood and city-wide priority. The Master Plan indicates that designation of "properties for acquisition is done for planning purposes only" and that "the present or prospective use ... shall in no way be affected by this Master Plan". This Element of the General Plan generally defers to the City's Local Coastal Plan for policies related to Parks and Recreational resources within the Coastal Zone. The proposed project's provision of approximately 10 acres of public park space is potentially consistent with the goals of the Parks and Recreation Facilities Programming Master Plan.

3.0 Redevelopment Plan

The First Amended Redevelopment Plan gives the project site a designation of "Recreation and Park". Land Use Designation 6b includes permitted uses such as park and recreation facilities, public-oriented facilities, and other facilities for the service, use, benefit and enjoyment of residents and visitors. However, it should be noted that the Redevelopment Plan does not preclude the uses envisioned for the site by the City's Local Coastal Program. Therefore, in that the proposed project provides facilities for the service, use and enjoyment of visitors, it is considered potentially consistent with the general intent of the Redevelopment Plan.

4.0 City Zoning Ordinance

The City's Zoning Ordinance is intended as one of the implementing mechanisms for the City's General Plan. The project site is designated as HRC-2, S-D-3, Hotel and Related Commerce with a Coastal Zone Overlay. The proposed project is potentially consistent with the provisions of this zone.

Section 28.87.300 of the City Zoning Ordinance specifies the Development Plan review and approval process. The park and hotel components of the proposed project are considered to be in the Pending Project category under Charter Section 1508 and Zoning Ordinance Section 28.87.300 A.2 because "the project pertains to implementation of a Specific Plan which was approved prior to April 16, 1986." The hostel component is considered to be in the Small Additions category. In addition, the proposed park building square footage has received a preliminary "Community Priority" project designation.

Subsection E defines Standards for Review and requires that the following findings be made in order to approve a development plan submitted pursuant to this Section, unless specifically exempt:

1. *Findings:*

a. *The proposed development complies with all provisions of this Title; and*

b. *The proposed development is consistent with the principles of sound community planning;*

c. *The proposed development will not have a significant adverse impact upon the neighborhood; and aesthetics/character in that the size, bulk, or scale of the development will be compatible with the neighborhood; and*

d. *The proposed development will not have a significant, unmitigated, adverse impact upon City and South Coast affordable housing stock; and*

e. *The proposed development will not have a significant unmitigated adverse impact in the City's water resources; and*

f. *The proposed development will not have a significant, unmitigated adverse impact on the City's traffic; and*

g. *Resources will be available and traffic improvements will be in place at the time of project occupancy.*

2. *Potential for Overriding Considerations:*

a. *A finding of significant adverse impact under Subparagraph 1.c above can be overridden if it is determined that the economic, social or public benefits of the proposed development outweigh its significant adverse impacts.*

b. *A finding of significant adverse impact under Subparagraphs 1.a, or 1.b above cannot be overridden.*

c. *A finding of unmitigated significant adverse impact under Subparagraphs 1.d, 1.e, 1.f, or 1.g above for a Minor Addition Project, Government Displacement Project or that portion of a project which qualifies as a Government Displacement Project, a Community Priority Project, and an Approved Project or Revision thereto can be overridden if it is determined that the benefits of the proposed development outweigh its significant adverse impacts.*

In order to be consistent with Subparagraph 1.a, the Planning Commission would have to approve the requests for zoning ordinance modifications (refer to Section III. F., Discretionary Actions). As previously discussed, the project appears to be potentially consistent with the principles of sound community planning as reflected by Principles 5, 8 and 9 and the Conservation Element of the General Plan, the Land Use section of the Local Coastal Plan and relevant portions of Sections 30244, 30251, 30253 and 30254 of the State Coastal Act. In addition, the project is not expected to create significant, unmitigated long term adverse impacts to the neighborhood's aesthetics/character, the City's affordable housing stock or water resources. Subsection f. requires the Planning Commission to find that resources would be available and traffic improvements would be in place at the time of project occupancy in order to approve the project. It should be noted that implementation of two traffic mitigation measures requires the cooperation of other entities. The extension of Salsipuedes Street involves the purchase of private property from Southern Pacific Transportation Company (SPTC). SPTC has expressed a willingness to cooperate with the City, although the timing of such improvements is still unclear. The area of greater concern, however, is the signalization of the Cabrillo/U.S. 101 intersection. This intersection is controlled by Caltrans. Caltrans has future plans to make significant modifications to this intersection as part of the next phase of widening the U.S. 101 Highway. Caltrans has reviewed the traffic study prepared for this EIR and they have no

concerns at this time with installing traffic signals as an interim measure. Improvements to Cabrillo/U.S. 101 and Salsipuedes Street must be implemented prior to issuance of the Certificate of Occupancy in order to be potentially consistent with subsection f. Therefore, if the proposed zoning modifications are approved, and the required traffic improvements can be implemented, the project would be considered potentially consistent with the provisions necessary for Development Plan Approval. The reader is referred to individual sections of this EIR which pertain to the issues discussed above for further information on project impacts and mitigations.

5.0 Local Coastal Plan

Within the Waterfront Area, the City's General Plan is implemented through the Land Use Plan of the Local Coastal Program (LCP). The LCP designates the site as Recreational Open Space. In relation to the project site, the text of the LCP states as follows:

> *(b) Palm Park Area (North of Cabrillo Boulevard): The Palm Park area inland of Cabrillo Boulevard includes two vacant parcels of 29.58 and 2.27 acres in respective size. It is centrally located along Santa Barbara's Waterfront Area where the greatest demand for recreational and visitor serving facilities appears to be concentrated. Because this is one of the last remaining parcels along Santa Barbara's Waterfront, maintaining a balance of commercial visitor serving uses and public recreational uses in keeping with the Santa Barbara character is important. The area is currently being considered for Hotel/Conference Center/Park/Condominium development. In order to ensure that a balance of visitor serving uses and public recreational uses occurs, the following recreational issues should be considered in any development of the site.*
>
> *Consideration should be given to the provision of public open spaces within the development area to reduce over-crowding and demand on existing recreational and open spaces adjacent to the area.*

The provision of public open space within the project site is of critical importance in the context of the approval of the overall Specific Plan. There are presently conditions imposed by the Coastal Commission which require that the maximum developable area for parcels "B" and "C" be limited to 2.0 acres unless a hostel is provided at a location within the coastal zone and in relative proximity to the train depot. The proposed project is potentially consistent with this provision in that a youth hostel is proposed for the southeast corner of Chapala and West Montecito Streets, within 500 feet of the Southern Pacific Railway Station. These conditions and the basis for their existence are more fully discussed below under the heading of Coastal Commission Conditions of Approval. However, these current conditions of approval also have importance in the context of the City's LCP discussion of the site. The project proposes 3.0 acres of luxury hotel and 10 acres of active and passive recreational open space.

5.1 Recreation

Within the Coastal Plan recreation discussion, the project site is considered under "Expanding Recreational Opportunities - Palm Park Area (North of Cabrillo Boulevard)" which states, "Consideration should be given to the provision of public open spaces within the development area to reduce over-crowding and demand on existing recreation and open spaces adjacent to the area."

Policy 3.2 *The City shall seek public dedications of all public properties utilized for public recreation, and all private properties donated for public use.*

The proposed project implements this policy through a partnership of the Parker Family Trust and the City of Santa Barbara RDA which allows for the dedication of 4.943 acres of privately held property to the City. The project is therefore considered potentially consistent with this policy.

Policy 3.3 *New development proposals within the coastal zone which could generate new recreational users (residents or visitors) shall provide adequate off-street parking to serve the present and future needs of the development.*

The proposed Waterfront Park and Hotel component would generate new resident and non-resident users and their associated parking demand. However, because the park does not provide sufficient parking to meet its short-term demand, the project is **potentially inconsistent** with this policy. This inconsistency would be resolved at such time as Garden Street is extended and additional parking is provided through the enlargement of the Santa Barbara Street parking lot. The youth hostel is not anticipated to generate any direct recreational parking demands.

Policy 3.4 *New development in the coastal zone which may result in significant increased recreational demand and associated circulation impacts shall provide mitigation measures as a condition of development including, if appropriate, provisions of bikeways and bike facilities, pedestrian walkways, people mover systems, in lieu fees for more comprehensive circulation projects or other appropriate means of compensation.*

The proposed Waterfront Park and Hotel component includes within its design the provision of pedestrian circulation elements and bicycle parking facilities. The provision of bikeways through or immediately adjacent to the proposed park facilities are not appropriate because of the nature of the uses proposed and the existence of the coastal bikeway on the south side of Cabrillo Boulevard in Chase Palm Park. Therefore, the Waterfront Park component of the project is considered potentially consistent with this policy.

The luxury hotel component could generate additional demand for recreation as well. However, the size of the Waterfront Park component, coupled with the significant supply of other recreational opportunities, supports a finding of potential consistency with this policy. The hostel is not anticipated to result in significant recreational demands.

Policy 3.6 *The City of Santa Barbara shall consider expansion of both public parking and public open space at Palm Park north of the existing alignment of Cabrillo Boulevard.*

The proposed project implements this policy through the creation of a 10 acre public park and 63 parking spaces available for use by the public. Therefore, it is considered potentially consistent with this policy.

Policy 3.7 *The City of Santa Barbara shall require selective scheduling of major recreational events at park facilities in the coastal zone in order not to congest the traffic and circulation system in the area.*

The programmatic design of the proposed park portion of the site is such that major recreational events such as volleyball or soccer matches are not expected to take place. Therefore, the project is potentially consistent with this policy.

Policy 3.8 *The City of Santa Barbara shall consider relocation of the Arts and Crafts Show in the event of one of the following site relocation opportunities becomes available.- (1) Palm*

Park Expansion allows for more suitable relocation and enhanced parking, or, (2) development inland of Cabrillo Boulevard provides public open space and parking such that the show may be moved to the north side of Cabrillo Boulevard, or, (3) any other suitable location [is] made available.

The proposed project does not preclude relocation of the Arts and Crafts show to the public portion of the project park portion of the site. Therefore, the project appears to be potentially consistent with this policy. However, the project as proposed does not anticipate or provide space for such a relocation at this time.

Policy 3.13 *Developers shall be required to provide on-site recreational open space and parking for new users generated by any development of vacant or underdeveloped properties inland of Cabrillo Boulevard.*

The proposed project is considered potentially consistent with this policy due to the substantial allocation of recreational open space and parking for users.

The above determinations are supported by language within the Coastal Commission staff report on the approved Specific Plan. Within that document, it was noted that the Coastal Act, in addressing the issue of Priority Uses on Coastal Lands, requires that "oceanfronting lands suitable for recreational use shall be protected for such use where present and future demands for such uses require such protection (PRC 30221); that the use of private lands suitable for visitor serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over all other uses (PRC 30222); and that lower cost visitor and recreational uses be protected, encouraged and provided where feasible, and developments providing public recreational opportunities are preferred (PRC 30213)". In evaluating the Land Use Plan's textual discussion of the westerly property (parcels B & C), the Staff report notes that "...the western half of the property, excluding the buffer area, shall be designated Recreation/Open Space, with an underlying designation of Mixed Uses, consisting of HRC II and Residential". This latter designation signifies that if the property is not developed as a planned expansion of Palm Park north of Cabrillo Boulevard, the appropriate secondary land use should be one of a "mixed use" nature. Also a portion of this western area is expected to fulfill the requirements of the "Recreation" and "Public Service" dedication requirements (policies 3.3, 3.5, 3.14, 11.7)."[5]

5.2 Visitor-Serving Uses

Policy 4. 1 *In order to preserve and encourage visitor-serving commercial uses, 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".*

The proposed project is potentially consistent with this policy due to the nature of uses provided.

Policy 4.2 *New visitor-serving development permitted pursuant to Policy 4.1 [HRC I & II Zoning] shall be:*

1. *Reviewed by the Architectural Board of Review for compatible architectural design;*

[5] Coastal Commission Staff report, page eight.

2 *Be consistent with the adopted LCP Visual Quality Policies;*
3. *Provide to the maximum extent feasible, public view corridors, open spaces, and pedestrian (and/or bicycle) walkways and facilities;*
4. *Provide adequate off-street parking to serve the needs generated by the development; and,*
5. *Provide measures to mitigate circulation impacts associated with the project including but not limited to coordination with the Redevelopment Agency's Transportation Plans for the area, provision of in lieu fees, provision of bicycle facilities, and other appropriate means of mitigation.*

The proposed project has been reviewed by the Landmarks Committee and Architectural Board of Review for compatible architectural design. The project's consistency with LCP Visual Quality Policy #3 is discussed above. As noted in the Aesthetics section of this EIR, the project's landscaping would obstruct view corridors from the beach to the foothills (i.e., Riviera) unless mitigation measures specified therein are carried out. As mitigated, the proposed hotel would meet the peak parking demands during special events. To satisfy the intent of this sub-component, the development would have to provide parking in sufficient supply to meet project demands. Adequate parking for the hotel component to meet its peak demand requires the provision of a minimum of 100 new or other parking spaces. This requirement may be fulfilled by using the unused/underutilized parking currently located at the westerly end of the Red Lion Resort immediately across Salsipuedes Street from the proposed hotel portion of the site. In addition, without the extension of Garden Street, the parking demand of the park component would also exceed supply. For additional information, the reader is referred to the Traffic, Circulation and Parking section. With regard to sub-component #5, the hotel component does not comply with the Transportation Management Plan adopted as a mitigation measure for the amendment of the Central City Redevelopment Plan (within whose project area the proposed development lies). For these reasons, the proposed hotel and park components are **potentially inconsistent** with LCP Policy 4.2.

<u>Policy 4.4</u> *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.*

The luxury hotel component of the project provides 150 rooms at the uppermost range of room rates in the City of Santa Barbara, along with the accompanying amenities of a pool, formal dining room, and guest health facility. The 75 bed youth hostel component provides lower cost accommodations as envisioned by PRC 30213. The room rates of the hostel are oriented to visitors who may not wish to arrive by or rent an automobile. Given the very large range of rates offered by the proposed hotel and hostel, the project in its entirety is considered potentially consistent with this policy.

<u>Policy 4.6</u> *The Southern Pacific Property shall be designated for a mixture of visitor-serving uses and recreational opportunities and planned as an integral unit in order to minimize potential circulation and other environmental impacts.*

Action: The City shall require the submittal of a specific plan for the area ... Land uses located on private lands on the western portion of the property north and immediately adjacent to the strip of publicly owned land fronting on Cabrillo Boulevard shall be limited to open space and recreational uses abutted to the north by visitor-serving and/or mixed visitor-serving residential uses. Residential uses on this portion of the area shall not predominate other priority Coastal Act uses.

As this policy directs the City to require the preparation of a Specific Plan for the site, the project as

proposed has accommodated this requirement and is potentially consistent with this policy. There are no residential uses proposed by the project.

Policy 5.5 *At least twenty percent (20%) of tax increment moneys accruing from that portion of a Redevelopment Project area in the coastal zone will be used to protect, encourage, and, where feasible, provide housing opportunities for persons of low and moderate income within the coastal zone.*

The proposed project lies within the coastal zone and the Redevelopment Area. As such, it would generate tax increment moneys for use by the Redevelopment Agency. However, as this policy represents more of an implementing strategy than an actual policy, it is inappropriate to make a determination of consistency or inconsistency.

5.3 Water and Marine Environments

Policy 6.1 *The City through ordinance, resolutions, and development controls shall protect, preserve, and where feasible restore the biotic communities designated in the City's Conservation Element of the General Plan and any future annexations to the City, consistent with PRC Section 30240.*

The water elements of the proposed Waterfront Park component will protect, preserve, restore and expand the wetland resources which are present on site. These resources are presently in a severely degraded condition. Through a program of landscape planting and revegetation, the biological communities present on the site will be enhanced. In this regard, the project is potentially consistent with this policy.

Policy 6.8 *The riparian resources, biological productivity, and water quality of the City's coastal zone creeks shall be maintained, preserved, enhanced, and where feasible, restored.*

The proposed project envisions the restoration and enhancement of Laguna Channel as it passes through the site. In addition, efforts will be made to improve the creek's water quality through landscape plantings and the elimination of industrial storage uses on the remainder of the site. In this regard, the project is potentially consistent with this policy.

Policy 6.9 *The City shall support the programs, plans, and policies of all governmental agencies, including those of the Regional Water Quality Control Board with respect to best management practices for Santa Barbara's watersheds and urban areas.*

Policy 6.10 *The City shall require a setback buffer for native vegetation between the top of the bank and any proposed project. This setback will vary depending upon the conditions of the site and the environmental impact of the proposed project.*

The proposed Waterfront Park provides for a landscaped buffer and structural setback zone for Laguna Channel. The only structures/improvements which are proposed in close proximity to Laguna Channel are those related to the improvement and restoration of wetlands and for public and emergency vehicular access. Therefore, the project is potentially consistent with these policies.

5.4 Visual Quality

Policy 9.1 *The existing views to, from, and along the ocean and scenic coastal areas shall be*

protected, preserved, and enhanced. This may 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.

The proposed Waterfront Park and Hotel component is considered potentially consistent with subparagraphs (a), (b), and (c) of this policy. The Visual/Aesthetic Resources section of this EIR and the requirements of the Specific Plan are considered a sufficient and evaluative method for assessment of view impairment.

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

All project components are considered potentially consistent with this policy because utilities would be located underground.

Policy 9.5 *All parking facilities shall be screened from public view in a method suggested in the City's Scenic Highways Element of the General Plan.*

All project elements are considered potentially consistent with this policy.

5.5 Public Services

The City of Santa Barbara prepared a study, Waterfront Area Transportation Study (WATS), in order to determine the effect that congestion on U.S. Highway 101 was having on Waterfront Area streets. The report concluded that congestion on U.S. Highway 101 prior to its widening was indeed affecting traffic patterns, and that Waterfront Area streets were being utilized as alternative routes to the freeway. This pattern of use was resulting in several intersections operating at or near unacceptable levels of service. Several alternatives were presented to alleviate these impacts in the period before improvements to U.S. 101 Highway were completed. Now that U.S. Highway 101 has been widened, the deficiency point system and its associated LCP policies (11.2 and 12.1) no longer apply.

Policy 11.5 *All new development in the Waterfront Area, excepting Stearns Wharf shall provide adequate off-street parking to fully meet their peak needs. Parking needs for individual developments shall be evaluated on a site-specific basis and at minimum be consistent with City Ordinance Requirements.*

The policy requires that parking be adequate to meet peak needs, based on demand. Consistency with City Ordinance requirements includes allowance for parking modifications if demand is met by providing less parking. The analysis of project-related parking demands shows that it is not necessary for the hotel portion of the site to provide the 519 spaces required by ordinance in order to meet parking demand.

However, the 245 spaces proposed as part of the hotel are inadequate to meet demand. An additional 100 spaces are required. For this reason, the applicants have proposed to supplement on-site parking through an agreement to use the under-utilized/surplus parking spaces on the adjacent Red Lion Resort property through a lease agreement. While the policy above does not address the "conjunctive" use of off-site, off-street parking, the end result of the proposed lease agreement would mitigate potential impacts to on-street public parking resources in the Waterfront Area. At the same time this arrangement would minimize the creation of additional impervious surfaces in the area. Therefore, this project component is considered potentially consistent with the intent of this policy. With regard to the park component, its parking supply is insufficient to meet anticipated demand without the extension of Garden Street. Therefore, in the near-term, that component is **potentially inconsistent** with this policy.

Policy 11..7 *Any proposed development of the Southern Pacific Property located south of the existing railroad right-of-way, north of Cabrillo Boulevard, west of Milpas and Punta Gorda Streets, shall provide replacement public off-street parking spaces if the existing public spaces presently within the public right-of-way of Carpinteria Street are removed.*

The proposed project is considered to be **potentially inconsistent** with this policy since parking lost on Carpinteria Street would not be replaced as part of the park portion of the development. At such time as Garden Street were extended no supply/demand imbalance would exist and the inconsistency would be resolved.

Policy 11.11 *The City shall encourage ride-sharing and car-pooling as a means of minimizing traffic demands in the Waterfront.*

A transportation management program (TMP) is required as a mitigation measure in this EIR. Given that submittal of the TMP is required as a mitigation measure, the project is considered potentially consistent.

Policy 11.15 *Pedestrian movement and safety should be encouraged and provided for throughout the area.*

The Waterfront Park and Hotel project provides for ample and safe pedestrian movement through a well designed network of pathways. It is therefore potentially consistent with this policy.

5.6 Land Use

Policy 12.2 *New developments within the City's Waterfront Area shall be evaluated as to a project's impact upon the area's:*

(1) Openness;
(2) Lack of Congestion;
(3) Naturalness; and
(4) Rhythm.

The proposed park and hotel component achieves openness through the retention of approximately 88% of the site as open space. This factor, coupled with well designed walkways, access points, and public and project-related parking minimizes the potential for congestion. The restoration and enhancement of on-site vegetation and riparian habitat provides a beneficial impact to the site's natural character. Finally, the landscape planning and site design seek to establish a rhythm which is complementary of the Waterfront Area. Therefore, this component is considered potentially consistent with the above policy.

Because of the proposed hostel's location adjacent to U.S. 101 and the Moreton Bay Fig Tree, ample open space presently exists to complement the proposed structure. The concept of naturalness is reinforced by the presence of the fig tree adjacent to the site. The assessment of the rhythm of the proposal is speculative at best, considering its urban location adjacent to U.S. Highway 101. Because of the large proportion of park use provided, there are no land use impacts regarding congestion and this component is considered potentially consistent with the above policy.

6.0 State Coastal Act

Section 30212.5 - Public Access

> *Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, or overcrowding or overuse by the public of any single area.*

The proposed Waterfront Park and Hotel component would serve to augment the current supply of public open space and off-street parking in the Waterfront Area east of State Street. By doing so it would serve to distribute recreation and parking uses over a broader geographical area. Therefore, the project is potentially consistent with this section of the Coastal Act.

Section 30213 of the Coastal Act of 1976, as amended states that:

> *Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.*

Approval of the proposed Specific Plan by the Coastal Commission entailed the addition of conditions related to the provision of a hostel either on-site or off-site. As interpreted by Coastal Commission staff and the preamble of the "Agreement Imposing Restrictions on Real Property" for the project site which relates to implementation of the conditions imposed by the Coastal Commission,

> *"... a permit for this development may only be issued upon satisfaction of conditions assuring that provision of lower cost visitor serving facilities for low and moderate-income persons in order to meet the policies of the Coastal Act, and particularly Section 30213, and that without such provision, this development would be inconsistent with the Coastal Act, and no permit could issue[sic]."*

The proposed project provides for off-site, lower cost, visitor-serving facilities in the form of a 75-bed youth hostel to be developed at the southeast corner of East Montecito Street and Chapala Streets. Therefore, the project is considered potentially consistent with this policy.

Section 30221 - Recreation

> *Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.*

The proposed project would preserve and enhance approximately 10 acres of previously under-utilized land area for recreational use and development. For this reason, the project is considered potentially consistent with this section.

Section 30222 - Recreation

> *The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.*

The recreational and visitor-serving nature of the land uses proposed for the park and hotel site render the project potentially consistent with this section of the Coastal Act.

Section 30230 - Marine Environment

> *Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.*

Section 30230 requires that marine resources be maintained, enhanced, and where feasible, restored. Section 30231 requires that the biological productivity and quality of coastal wetlands appropriate to maintain optimum populations of marine organisms be maintained and where feasible restored, through, among other means, encouraging wastewater reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

The Statewide Interpretive Guidelines for Wetlands (Dec. 1981) define degraded wetlands generally as coastal wetlands that were formerly tidal but have been modified to the extent that tidal influence has ceased or substantially diminished. Additional factors in defining "degraded" are the amount and elevation of fill, degree of topographic alteration, substrate quality, comparison of historic to present environmental conditions, present wildlife resources, and the ease with which tidal action could be restored.

The proposed project includes the restoration and revegetation of both Laguna Channel (a riparian corridor) and the existing degraded wetland area. Approximately 600 square feet of degraded wetland would be lost, while approximately 3,000 square feet of wetland would be restored. As described in the project description section of the EIR, the wetlands within the project site are dominated by non-native plants, degraded by the addition of fill material and litter, cut off from tidal influence, and provide low biological functional value. Given the existing low quality of these wetland resources, and the proposed plans to enhance functional biological values through removal of non-native plants, planting of native riparian and wetland species, and the filtering of waters from Laguna Channel, the project appears to be potentially consistent with the intent of these policies.

Section 30231 - Marine Environment

> *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

The proposed improvements to Laguna Channel, coupled with on-site restoration and enhancement of wetland areas, result in the project being considered potentially consistent with the letter and intent of this

section of the Coastal Act. Please see discussion under Section 30230 above.

Section 30240 - Land Resources

(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only such uses dependent on such resources shall be allowed within such areas.

(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade such areas, and shall be compatible with the continuance of such habitat areas.

The proposed Waterfront Park would restore and enhance the environmentally sensitive habitat areas within and adjacent to Laguna Channel. These improvements would prevent impacts which could result in habitat degradation. For these reasons, the project is considered potentially consistent with the relevant portions of Section 30240.

Section 30244 - Land Resources

Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

A Phase II archaeological investigation was prepared for the hotel portion of the site as part of this EIR to determine the potential significance of the Shores Acres site. The results of the investigation concluded that no significant archaeological site was located in the area where the hotel was proposed to be located. The park and hostel site are not known to be archaeologically sensitive (see Archaeological Resources section). Therefore, the proposed project is considered potentially consistent with this section.

Section 30251 - Development

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 Recreation and by local government shall be subordinate to the character of its setting.

The hotel and park site is currently considered a visually degraded area. The proposed park portion of the site would enhance the site's visual and biological resources by expanding existing wetlands and reintroducing native plants. The proposed hotel portion of the site's development is visually compatible with the character of land uses in the surrounding area, such as the Red Lion Resort. In addition, the Visuals/Aesthetic analysis section of this EIR concluded that development of the hotel portion of the site would not create any long term significant, adverse impacts to view corridors. However, significant unavoidable short term visual impacts would result from grading and site preparation. Because these short term impacts would occur with any development of the site, they are not relevant to a determination of policy consistency on inconsistency with regard to Section 30251. Therefore, the proposed project is considered potentially consistent with this section.

Section 30252 - Development

The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing non-automobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.

The proposed Waterfront Park and Hotel component is potentially consistent with the applicable portions of this policy. Subsections (1), (2), (3), and (5) do not apply to this project. The youth hostel component maximizes the extension of transit services through its location in close proximity to the Southern Pacific railway station. The pedestrian circulation within the park and hotel site provides non-automobile circulation within that development area. In the short-term, the park component would not be consistent with subsection (4). However, the proposed park would be consistent in the long-term with the provision of new parking from the Garden Street extension. As proposed, the hotel component is **potentially inconsistent** with this condition. For the hotel component to meet its peak demand requires the provision of a maximum of 100 new or other parking spaces. This requirement may be fulfilled by using the unused/underutilized parking currently located at the westerly end of the Red Lion Resort immediately across Salsipuedes Street from the proposed hotel portion of the site. The recreational aspects of the project comply with the intent of subsection (6).

Section 30253 - Development

New development shall:

(1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.

(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

(3) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Control Board as to each particular development.

(4) Minimize energy consumption and vehicle miles traveled.

(5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

The proposed project appears to be both potentially consistent and **potentially inconsistent** with components of this section of the Coastal Act for the following reasons:

(1) A preliminary geotechnical report has been prepared and recommendations included in the project description. Thus the project is considered potentially consistent with this component.

(2) See (1) above.

(3) No requirements have been imposed on the project by the State Air Resources Control Board or the Santa Barbara County APCD. In addition, the project would result in significant, adverse, short-term and long-term impacts to air quality. Therefore, the proposed project is considered **potentially inconsistent** with this component.

(4) An energy conservation program has been prepared for the project and a transportation

management program is required as a mitigation measure. Therefore, the proposed project is considered potentially consistent with this component.

(5) The Specific Plan on the project site contains requirements relative to the project site and the character of the area. Therefore, the project is considered potentially consistent with this component.

Section 30254 - Development

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; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

The proposed project is considered potentially consistent with the intent of this section because public recreation and visitor-serving land uses are proposed in the coastal zone.

7. 0 Specific Plan Conditions of Approval Imposed by the City of Santa Barbara

In approving the Specific Plan for the proposed park and hotel site, the City of Santa Barbara imposed a number of conditions upon the Specific Plan. Within the Specific Plan itself, these conditions are referred to as Permitted Uses (Section VI.B.) and Development Regulations (Section VII). The relevant Specific Plan sections quoted below encompass the approved and conditioned Specific Plan No. 1. In addition, analysis is also provided for the proposed amendments. Where appropriate, the proposed Specific Plan Amendments are contained in the EIR's appendix.

While the proposed project is consistent with a number of those conditions, review of the application materials submitted to the City of Santa Barbara as part of the project application indicate that some Development Regulations have not been satisfied. Provided below are quotes from the Specific Plan conditions (in italics) followed by a potential consistency/inconsistency determination. Parcels B and C refer to the proposed park and hotel site.

Parcel B and C

1. Primary Use

As indicated in the City's Local Coastal Plan, the primary land use for the area west of the extension of Salsipuedes Street shall be public park and recreational facilities developed in conjunction with public parking.

2. Secondary Use

If Parcells B and C are not acquired, dedicated, or otherwise developed for public park and recreational facilities, the following uses shall be considered in compliance with the underlying land use designation described in the City's Local Coastal Program subject to all development regulations adopted pursuant to the authority and conditions herein:

- o *Visitor-serving uses in accordance with the Local Coastal Program designation for "Hotel and Related Commerce II", but excluding Hotel and Motel uses.*

- o *Recreation and open space facilities in conjunction with parking.*

- o *Multiple-family residences developed as part of a mixed use project subject to the following conditions:*

a. *Residential use shall be developed consistent with Coastal Act section 30213 and L.C.P. Policy 5.6*

b. *Residential building coverage shall not encompass more than 40% of the building coverage of visitor-serving uses on Parcels B and C.*

c. *Development of residential use shall be in compliance with the provisions of L.C.P. Policy 4.6 and the related section.*

The proposed project is in compliance with these conditions in that the primary land use (approximately 80%) of Parcels B and C is public, recreational open space. The proposed hotel use is **potentially inconsistent** with the exclusion of hotel and motel uses embodied in the approved Specific Plan (see also Section 9.0 below). However, if the Specific Plan Amendment allowing hotel uses on Parcel B is approved, the project would be considered to be potentially consistent with this provision of the Specific Plan.

DEVELOPMENT REGULATIONS

1. *Deficiency Point System*

A. *Traffic and Circulation*

b. *Parcel B and C*

In accordance with the policies for the City's Coastal Zone, the development of Parcel B and C is not a priority use for which deficiency points have been reserved. Development of Parcels B and C shall be evaluated for deficiency points in the same manner as all other projects in the Waterfront Area consistent with LCP Policies 11.2, 12.1, and Coastal Act Section 30254. The cumulative total of the development of Parcels A, B and C shall not exceed 30 deficiency points or 552 p.m. peak hour trips as determined by the Department of Public Works.

c. *Monitoring*

Automatic traffic counters shall be installed at the entrances and exits of each parcel which can be monitored for purposes of assuring compliance with "a" and "b" above. If upon inspection by the City of violations of these conditions, development permits approved pursuant to the authority and conditions of this plan shall be reviewed by the Planning Commission for additional controls and conditions to reduce traffic generated by such developments.

Prior to the widening of U.S. Highway 101, a deficiency points system for all projects in the Waterfront

Area was created which was consistent with LCP Policies 11.2, 12.1 and Coastal Act Section 30254. However, since the widening of U.S. Highway 101 has been completed, the deficiency point system required by this condition is no longer in effect.

2. *Parking*

   a. *Development shall provide parking in accordance with the minimum City ordinance requirements. However, parking needs for individual development may be evaluated on a site/use-specific basis. Parking shall be provided to meet peak parking needs as justified through written evaluation by the applicant and reviewed by the Transportation Committee and/or Planning Commission. New development may, based upon site-use-specific considerations, be required to provide parking in excess of the minimum ordinance requirements. In the case that parking needs are determined to be less than minimum ordinance requirements, the Planning Commission may approve a Modification Application.*

The proposed park component does not provide adequate parking to meet its demand without the extension of Garden Street. Therefore, it is considered **potentially inconsistent** with this provision of the Specific Plan. The youth hostel component does provide adequate parking to accommodate its demand. As proposed, the hotel component is **potentially inconsistent** with this condition. For the hotel component to meet its peak demand requires the provision of a maximum of 100 new or other parking spaces. This requirement may be fulfilled by using the unused/underutilized parking currently located at the westerly end of the Red Lion Resort immediately across Salsipuedes Street from the proposed hotel portion of the site. A parking mitigation measure in this document requires that an agreement with the Red Lion Resort for the provision of 100 parking spaces be reached, or 100 new parking spaces must be developed off site. With implementation of this mitigation measure, the project would be considered potentially consistent with this condition. For additional information, the reader is referred to the Traffic, Circulation and Parking section.

3. *Alternative Transportation Incentive*

   b. *Parcel B and C*

      (1) *One (1) bicycle parking space for every seven (7) automobile spaces shall be provided.*

      (2) *Maps showing bicycle route and bus route/schedule information shall be posted in at least two (2) locations.*

      (3) *Shower, locker and enclosed lockable bike parking facilities shall be provided for use by all employees.*

      (4) *One (1) enclosed and lockable storage space of a size able to accommodate at least two (2) bicycles shall be provided for each residential unit.*

According to the City's Zoning Ordinance, the project is required to provide 519 parking spaces. This amount translates into a requirement for 74 bicycle parking spaces. In that the proposed project provides 50 bicycle parking spaces, it is inconsistent with this portion of the Approved Specific Plan. If the requested modification were granted, 245 parking spaces would be provided and the provision of 50 on-site spaces would be potentially consistent with this provision and the additional 100 off-site parking spaces.

4. *Public Improvements*

   a. *The developer shall widen adjacent streets as necessary to accommodate estimated future traffic volumes, non-project plus project. The calculations to support the proposed street widening, if any, shall be approved by the City*

Transportation Engineer.

b. *Adequate storage lengths for right-turn or left-turn movements shall be provided on streets adjacent to the project, including, but not limited to:*
   (1) *Eastbound left-turn on Cabrillo Boulevard at Punta Gorda Street.*
   (2) *Westbound right-turn on Cabrillo Boulevard at Punta Gorda Street.*
   (3) *Southbound on Punta Gorda Street at Cabrillo Boulevard.*
   (4) *Northbound left-turn on Punta Gorda Street at Milpas Street.*
   (5) *Southbound right-turn on Milpas Street at Punta Gorda Street.*
   (6) *Northbound left-turn on Punta Gorda Street at project driveways.*

The adequacy of such turning lanes shall be substantiated to the satisfaction of the City Transportation Engineer.

e. *The following alternative transportation measure shall be instituted at a minimum:*

   (1) *Bus pockets, shelters, and bike parking facilities, shall be provided as determined appropriate by the developer in concurrence with the City Transportation Engineer and the Metropolitan Transit District.*

   (2) *Use of bicycles shall be encouraged by:*
   - *Constructing shower and locker facilities for employees*
   - *Linking on-site bikeways with adjacent City bikeways. This should include linking to bike lanes on adjacent streets where appropriate.*
   - *Constructing bicycle storage facilities as required by City ordinance.*

The proposed project is potentially consistent with the majority of these provisions for public improvements subject to verification by the City's Transportation Engineer. However, as noted elsewhere in this section, the project is not consistent with the requirement relating to bicycle storage spaces (1 space per 7 parking spaces).

B. Visual and Aesthetics

1. <u>Building Setbacks</u>

a. *<u>Cabrillo Boulevard</u>*
   (2) *<u>Parcel B and C</u>*
      (a) *75 feet minimum measured from the existing curb line. Parking areas or driveways shall not encroach into the setback area.*

b. *<u>Salsipuedes Street/Punta Gorda Street/Milpas Street</u>*
   (1) *40-feet measured from the property line for one story buildings and parking structures and 75-feet measured from the property line for two story buildings and parking structures.*
   (2) *Surface and underground parking, plaza and recreation areas may encroach into the setback up to 25 feet from the property line along Salsipuedes Street, and up to 10 feet for Punta Gorda Street and Milpas Street.*

The proposed project is **potentially inconsistent** with the setback requirements along Salsipuedes Street. Conformance with this requirement would move the hotel approximately 41.5 feet to the west of its present

location, thus expanding the view corridor along Salsipuedes Street and reducing total park acreage. However, if the proposed Specific Plan Amendments are approved, the proposed project would be potentially consistent with the revised setback requirements contained within that proposal.

2. *Landscaping*
   - a. *All setback areas as specified in (1.a. and b.) above shall be landscaped.*
   - b. *Parking lots shall be landscaped in accordance with the City's Parking Ordinance and completely screened from all streets.*
   - c. *Landscaping along Cabrillo Boulevard shall be compatible with that of Chase Palm Park. Existing mature and healthy trees shall be saved and included in the landscaping design, or as provided within the development plan approval.*
   - d. *Dense, fast-growing species of trees and shrubs shall be provided along the railroad right-of-way.*
   - e. *All plant material shall be drought tolerant species.*
   - f. *All loading docks, trash areas, and service areas shall be screened with structural enclosures and dense landscaping.*

The proposed project is consistent with all components of this condition except for component e. The site is proposed to be landscaped with a variety of plant material, but not exclusively drought tolerant species. While the large majority of material is drought tolerant (including turf), the proposed park and hotel site is considered **potentially inconsistent** with component 2.e. For consistency to be achieved, the project would have to be fully landscaped with drought tolerant plant material or the wording of the Specific Plan amended.

3. *Building Height*
   - a. *Two (2) stories, not to exceed thirty (30) feet; or*
   - b. *Provide a height-setback relation study for the purpose of maximizing view protection/enhancement. If utilizing this method to determine building height, in no case shall any buildings exceed three (3) stories and 45 feet. Determination to allow height-setbacks shall be by the Planning Commission through advisement by the Architectural Board of Review and Landmarks Committee.*

The proposed project is potentially consistent with the height restrictions in that no building exceeds three stories and 45 feet and because a height-setback relation study has been prepared. In addition, because there are no long-term impacts on views, the intent of the height-setback relation study has been met.

4. *Architectural Design*
   - a. *The development of Parcels A, B, and C shall be subject to the Architectural Board of Review and Landmarks Committee to ensure that the architectural design, scale, and character are reflective of the character of the El Pueblo Viejo District.*

The proposed park and hotel were reviewed at joint meetings of the Architectural Board of Review and the Landmarks Committee on March 20 and April 15, 1991 (hotel only), May 15, 1991 (park only) and on August 19, 1991 and March 18, 1992 (park and hotel together). The members are generally in support of the direction of the hotel design. Therefore, the project is considered potentially consistent with this condition.

5. *View Corridors/Distance Between Buildings*
   a. *Prior to the development of Parcels A, B and C, a view corridor study shall be provided to determine the necessary distances between buildings. Views shall be assessed from Cabrillo Boulevard toward the foothills and mountains. The Architectural Board of Review and Landmarks Committee shall advise the Planning Commission on the determination of view corridors. In no case shall building separations be less than permitted in the basic zone established for the property.*
   b. *All buildings shall be oriented to preserve and enhance the determined view corridors.*

The proposed park and hotel are considered potentially consistent with this condition because a view corridor study has been prepared. However, the view corridor study is predicated on the proposed location of the luxury hotel, which is to be constructed as a single structure. In addition, because there are no long-term impacts on views, the intent of the View Corridor Study has been met. Therefore, language relating to the distance between buildings does not apply.

6. *Signs*
   a. *All signs shall be subject to review and approval, disapproval, or conditional approval by the Sign Committee.*
   b. *Signs shall be minimal, clear and unobtrusive.*
   c. *Pole signs as defined in the City's Zoning Ordinance shall not be permitted.*
   d. *A complete sign program shall be established and approved by the Sign Sub Committee for the future development of Parcels A, B and C.*

A determination of consistency or inconsistency will be required when information on signs is provided to the City.

7. *Other Regulations*
   a. *All utilities shall be placed underground.*
   b. *All exterior lighting shall be low intensity and the "white" light color spectrum, except that necessary for recreational activities.*
   c. *Lighting standards shall be designed in harmony with the coastal orientation of the site and architectural design of the building.*
   d. *Lighting standards shall not exceed 12 feet in height, excepting public street lights along the street right-of-way or that necessary for recreational activities.*

All utilities are proposed to be located underground. Pedestrian lights are proposed to be 12 feet high and parking lights are proposed to be 20 feet high. Therefore, the proposed project is considered potentially consistent with components 7.a. and d. No information on the lighting color spectrum or lighting standards has been submitted by the applicant. Therefore, no consistency determination for components 7.b. and c. can be made at this time.

C. *Recreation and Open Space*

2. *Parcels B and C*

   Additional dedication and improvement of park land may be required. The amount will be predicated upon the generated recreation demand by the particular project.

3. *Signalized pedestrian crossing shall be provided at Salsipuedes Street/Cabrillo Boulevard and Punta Gorda Street/Cabrillo Boulevard.*

The proposed project is considered potentially consistent with this condition because only 3.0 acres (instead of the maximum allowable 3.4 acres) would be developed for the hotel and the remaining 4.943 acres of land owned by the Parker Family Trust would be transferred in fee to the City for park purposes.

D. Geology and Drainage

1. Geology

Prior to the issuance of building permits, the applicant shall submit a revised geotechnical report. This report should relate specifically to the submitted plan, and address at a minimum:

a. The recommended design earthquake magnitude, the engineering characteristics of this earthquake (i.e., maximum ground acceleration, duration of strong shaking, etc.) including the effects of side conditions, and its likelihood of occurrence. Site effects may include changes in near surface conditions that will occur as a part of grading.

b. Measures to be implemented to reduce the potential for liquefaction beneath the proposed structures to a level that is consistent with hazard reduction policies of the City.

c. Measures to be implemented to reduce settlement to amounts that can be accommodated by the proposed site improvements (i.e., structures, drainage devices, etc.)

This report shall be reviewed by an independent qualified Engineering Geologist and a Soils Engineer retained by the City to ensure that the measures proposed meet the intent of City policies regarding hazard reduction. The design earthquake characteristics as developed in this report shall be taken into account by the structural engineer in the design of the proposed site improvements.

A preliminary geotechnical report has been prepared by the project applicant; however, it has not yet been reviewed by an independent engineering geologist and soils engineer. It is expected that the City will review this report prior to the issuance of building permits; therefore, the proposed project is considered potentially consistent with this condition.

2. Drainage

Public Works Department approval must be obtained for a drainage plan to provide adequate storm drainage for a 100 year storm for all three parcels, considering each parcel as fully developed. Adequate positive drainage for this site shall mean a positive underground storm drain system meeting the criteria of the interim design and improvement standards of the City as well as that no major sheet flow from the site shall significantly impede two lanes of traffic along Cabrillo Boulevard.

As each parcel develops, the portion of the underground drainage for that parcel must be constructed prior to issuance of a building permit to assure that there will be "no flooding" as described above during site construction with the site drainage for the parcel to be completed prior to the Certificate of Occupancy.

Since Punta Gorda Street is to be reconstructed with an increase in elevation, positive drainage must be provided fo (sic) the park on the south side.

A preliminary grading and drainage plan has been prepared. Drainage areas are designed to use four storm drain systems to carry drainage from the site. A description of the drainage system can be found in the Impacts Found Not Significant section. However, since no drainage system has been constructed at this point in time, it is premature to make a consistency determination with this condition.

E. Housing

1. *Any proposed residential development of Parcel B or C shall be in conformance with the Housing Policies of the City's Coastal Plan an (sic) Section 30213 of the Coastal Act of 1976.*
2. *Development proposals for Parcels A, B or C shall be accompanied by an analysis of short-term and long-term impacts upon the City's housing stock as discussed in the Final E.I.R. The study, at a minimum, shall develop strategies and programs to minimize any potential adverse impacts.*

The Parker Family Trust and the City Redevelopment Agency indicated in their application submittal that they are prepared to comply with any requirements for housing impact mitigation under Chapter 28.87.300. In addition, meeting the requirements of the Housing Mitigation Ordinance is a requirement of Development Plan approval and thus is part of the project description. However, until such time as a specific method of achieving mitigation has been specified, the proposed project is considered **potentially inconsistent** with this condition.

F. Public Service

1. Water Conservation

a. *Development of Parcels A, B and C shall be limited to a maximum water consumption of public potable water of two and four-tenths (2.4) acre feet per year per acre. Data shall be provided by the developer to ensure compliance with this provision and based on water consumption standards approved by the Department of Public Works.*

b. *Water conservation fixtures shall be provided as follows, but not limited to:*
   - *vacuum toilets*
   - *urinals - low flush*
   - *flow restricted faucets and showerheads*
   - *food mulchers in dishwashers*
   - *automatic flow reduction of hot water in showers*
   - *recycle of laundry water*

c. *Landscaping shall be drought tolerant vegetation. Irrigation systems for landscaping shall be designed for retrofitting for future use of reclaimed water.*

d. *Water sprinklers shut off between 9:00 a.m. and 500 p.m. in summer season.*

The proposed project's potable water demand is calculated to be 25.72 AFY, which is less than the 2.4 AFY/Acre maximum allowable use. As stated above, a variety of plant material would be used for landscaping and it would not be exclusively drought tolerant. All irrigation would use reclaimed water and the City Public Works Department would specify hours for irrigation. No irrigation is expected to occur between 8:00 a.m. and 6:00 p.m. in order to minimize public contact. Therefore, the proposed project is considered potentially consistent with components a, b, and d of this condition and **potentially inconsistent** with component c.

2. *Fire, Security, and Safety Protection*

a. *A complete disaster evacuation and safety plan shall be reviewed and approved by the Fire Chief. Said plan shall include, but not be limited to, the following:*

(1) Smoke detectors in all commercial areas, units, guest rooms and work spaces.
(2) Fire alarm system that is tested and reliable during all adverse circumstances.
(3) Sprinkler systems where determined to be necessary.
(4) Posted safety procedures and evacuation routes throughout.
(5) An evacuation and safety plan to include flood, fire, earthquake, hazardous materials and tsunami disaster warning.

b. *Adequate fire flow pressure as required by the Fire Chief shall be provided.*
c. *Building materials shall be fire resistant and designed to minimize fire hazards due to earthquakes or other natural disasters.*
d. *Security systems shall be provided, and such plans shall be approved by the Police Chief.*

The timing of the submittal of the disaster evacuation and safety plan is not stated in the Specific Plan; however, the required elements are more specific than are required at application submittal or Planning Commission approval. This plan is required prior to Land Use Clearance or Building Permit. The project is potentially consistent with these requirements.

G. *Noise Protection*

1. *Where feasible, usable yard areas, courtyards, open spaces, and recreational areas shall be separated from the noise sources by buildings or noise barriers so that those areas are not exposed to noise levels greater than 60 dB(A).*

2. *Building construction methods shall be utilized in the building design to attain interior noise levels no greater than 45 dB(A).*

With the implementation of mitigation measures required in the Noise and Vibration section of this EIR, the proposed project is considered to be potentially consistent with this condition.

H. *Energy Conservation*

Prior to the submittal of plans for development plan approval for Parcels A, B or C, the applicant shall submit a detailed energy conservation plan(s) which shall include, but not be limited to the following: ... The final plans for energy conservation shall be reviewed and approved by the City prior to the release of building permits. Their report and analysis shall be forwarded to the Land Use Controls Division for incorporation into the project as built.

The applicant has prepared an energy conservation plan for this project which reduces projected energy needs; thus, the project is considered to be potentially consistent with this condition.

8.0 California Coastal Commission Conditions of Approval

There are several conditions which were imposed as part of the Specific Plan approval by the California

Coastal Commission in 1981. The key condition relates to the amount of non-recreational development which can take place on the project site. Presently, this condition restricts the amount of non-recreational development to 2.0 acres unless a youth hostel is developed. If a hostel is developed on- or off-site, maximum non-recreational development is limited to 3.4 acres. With respect to the youth hostel, the conditions had three different alternatives available to the developer of Parcel A, (the Red Lion Hotel). Those alternatives were: 1) within two years either build a 75-bed hostel on site, or 2) build a 75-bed hostel offsite, or 3) dedicate 18,000 square feet onsite and post a bond for the preparation of plans and the payment of engineering fees in connection with a hostel. The third alternative was selected by the developer, who had the ability to change their mind within the two year period; however, there was a dedication recorded against Parcel B for an 18,000 square foot hostel. A bond was posted for the fees and for engineering. These actions complied with the condition.[6]

It is also important to consider that the dedication of the open space which was involved in the development of the Red Lion was contingent upon the development of Parcels B and C; therein lies the reason why there is no open space on Parcels B and C today, because no portion of Parcels B and C have been developed.

To clarify the above condition which requires the construction of a hostel if more than 2.0 acres of Parcel B is developed with non-recreational uses, the proposed project must provide for a 75-bed youth hostel either on the project site or at some off-site location within the Coastal Zone, between Castillo Street on the west and the Santa Barbara Cemetery on the east.

The proposed project is in compliance with both of these conditions in that a 75-bed hostel is proposed and non-recreational development (hotel component) is limited to 3.0 acres. Overall compliance with the conditions will be determined by the Coastal Commission when it acts on the proposed amendments to the Specific Plan.

9.0 Amendment to Specific Plan #1, Park Plaza

9.1 Background and Overview

As part of the proposed project, the applicants have requested that the City process an Amendment to Specific Plan #1, Park Plaza along with Development Plan Approval. The City has initiated this process based on the recommendation from the Planning Commission on June 11, 1992. The main components of the proposed amendment are shown as changes to the existing document (which is on file with the City Community Development Department) and include:

- Allowing the development of hotel/motel uses on Parcel B. The presently allowed uses are: Primary Use - Park and Recreation; Secondary Use - Visitor-serving retail and residential; no hotel/motel uses. In order to develop commercial uses on Parcel B, Parcel C would be required to be developed concurrently for recreational purposes.

- Addition of a 2.454 acre, City-owned parcel at Santa Barbara Street and Cabrillo Boulevard to the Specific Plan and a 0.223 acre Southern Pacific Transportation Company parcel for park purposes.

- Incorporate Coastal Commission conditions of approval requiring construction or dedication of a site for a hostel by requiring that a 75-bed hostel be constructed off-site within the Waterfront Area

6 Testimony of Steven Wiley, Assistant City Attorney, ERC Hearing, April 16, 1993.

concurrently with the hotel.

- Reduction in the required setback from the property line along Salsipuedes Street from 40 feet for one story buildings and 75 feet for two story buildings and parking structures to 33.5 feet, measured from the new curb line (25 feet from the property line) of Salsipuedes Street for all structures.

- Minor and miscellaneous revisions which recognize changes in City ordinances and regulations or clarify the original intent of the Specific Plan language.

- The Planning Commission added two components to the amendment at their June 11, 1992 meeting. Included was the addition of an element that addresses the housing needs of hotel employees and a request to provide youth and family-oriented activities on Parcel C.

The proposed Specific Plan amendment is potentially consistent with the underlying zoning of HRC-2, S-D-3 (Hotel and Related Commerce 2 and Coastal Overlay Zone).

9.2 Consistency Analysis

It is the intent of the approved Specific Plan No. 1 to guide the land uses of the project site to be potentially consistent with the goals and policies of the City's General Plan and Local Coastal Plan, applicable portions of the City's Zoning Ordinance (28.87.300) and mitigation measures outlined in the Final EIR on the project. For the purposes of evaluating the consistency of the project and its proposed amendment to Specific Plan No. 1, it is assumed that all mitigation measures required by this report to achieve both full mitigation and General Plan, Local Coastal Plan and Zoning Ordinance consistency, will in fact be implemented. As noted earlier in Section 7 (above) of this analysis, inconsistencies with the development regulations of the existing Specific Plan must be resolved either through changes to the proposed project or amendments to the approved Specific Plan. In this regard, the proposed project is **potentially inconsistent** with the development regulations of the Specific Plan as approved.

With regard to the provisions of Section VI.B.2.a., Permitted Uses, Parcels B and C, Secondary Uses for Parcel B, the section as presently written excludes hotel and motel uses as a secondary use (after the primary recreational open space use). As a result, the proposed project is, by definition, **potentially inconsistent** with the permitted uses portion of the current Specific Plan.

The exclusion of hotel rooms on Parcels B and C was included in the Specific Plan because of 1981 concerns regarding the number of hotel and motel rooms that could be developed by the applicant and others.[7] There were several other hotel projects that the City was aware of at the time the decision was made on the Park Plaza Specific Plan. If all rooms proposed at that time were built, 1700 rooms (including Park Plaza) would have been added to the City. Council and staff were concerned that the number of rooms proposed would result in overbuilding the hotel market, a trend already occurring on the national level.

According to City staff, at the time the Specific Plan was approved by the City and Coastal Commission in 1981, the City envisioned a different mix of uses for the Waterfront and Downtown than is now conceived. The Santa Barbara Economic Forecast and Hotel/Tourism Study was completed by the City in 1986. One

[7] City Planning Division Memorandum to the Planning Commission regarding Initiation of Specific Plan Amendment to Specific Plan #1, Park Plaza dated June 11, 1992.

finding of the study was that Santa Barbara does not have an equal share of the more affluent segments of the visitor market as shown by a substantially lower average gross hotel revenue per room per year, compared to the South Coast. (The reader is referred to Section VIII., Economic and Fiscal Analysis for more information.) The City shifted its economic development emphasis to focus on retail in the Downtown and hotel/motel development in the Waterfront as a result of the study.

The passage of Measure E (Charter Section 1508) in 1989 significantly reduced potential non-residential growth in the City until 2009. In addition, the City amended the General Plan Land Use Element to be potentially consistent with Charter Section 1508. The goals and policies recognize the need to focus on visitor-serving uses in the Waterfront and retail uses in the Downtown.

Given the changes in City policies and goals since Specific Plan #1 was approved, coupled with changing economic and market conditions, the proposed amendment is potentially consistent with the current focus and policies of the City. The proposed project, as conditioned and mitigated, is potentially consistent with other General Plan and Local Coastal Plan policies. In conclusion, there is no basis in existing City environmental and public policy that would preclude a change in the permitted secondary uses to allow for the proposed luxury hotel, assuming that inconsistencies with the Specific Plan's development regulations are resolved.

10.0 Regional Plans

10.1 County of Santa Barbara Air Quality Attainment Plan

The County of Santa Barbara has recently adopted the 1991 Air Quality Attainment Plan (AQAP) which governs the entire County, including the City of Santa Barbara. The primary method for determining consistency with the AQAP for residential projects rests upon comparison of actual population and housing statistics in Santa Barbara with projections used within the AQAP. A document entitled "Forecast 89"[8] was utilized for these projections in the AQAP. However, for commercial projects, the current guidelines indicate that growth-tracking mechanisms are currently inadequate for a similar comparison to be made between employment characteristics, commercial space, and projections in Forecast '89. Currently, a commercial project is judged to be potentially consistent with the AQAP if it incorporates AQAP Transportation Control Measures (TCM), if it includes applicable stationary source control measures and if the project is consistent with APCD rules and regulations. The City of Santa Barbara recently adopted a Transportation Demand Management Ordinance which would apply to the proposed project and which would require transportation measures consistent with AQAP TCMs for this project. Space heating and kitchen appliances used at the facility should be selected for high efficiency ratings, but the APCD does not usually require stringent source controls on this type of equipment. Lastly, the proposed project would be potentially consistent with APCD rules and regulations, which are generally limited in the area of hotels, hostels and park facilities. Therefore, the proposed project is considered to be potentially consistent with the adopted 1991 AQAP.

10.2 County of Santa Barbara Congestion Management Plan

In June 1990, California voters approved legislation which increased funding for California's transportation system. With the passage of Proposition 111, there were new requirements for the transportation planning process that require urbanized counties, such as Santa Barbara County, to prepare, adopt and annually update a Congestion Management Program (CMP). The intent of the CMP is to address congestion

[8] Santa Barbara County - Cities Area Planning Council, Regional Growth Forecast, April 1989.

problems on state highways and principle arterials in a coordinated manner between state, regional, county and city transportation and land use planning agencies, transit providers and air pollution control districts. The CMP applies to all the incorporated cities and the unincorporated area in the County of Santa Barbara.[9]

The CMP Roadway Network for the project area includes Cabrillo Boulevard, State Street and U.S. Highway 101 and the major intersections along this network. For this Roadway Network, The CMP establishes a minimum acceptable roadway level of service (LOS D; volume/capacity (v/c) ratio = 0.81 to 0.90 or the existing LOS of the facility, whichever is worse). To establish the LOS baseline measurement, extensive monitoring of the CMP system was conducted with the cooperation of the cities, the county and Caltrans. Monitoring results indicate that several intersections, including the signalized intersections of U.S. 101 Northbound Ramps/Milpas Street and Castillo Street/Montecito Street which are located in the vicinity of the proposed project, operate at LOS D. However, improvements are planned for the Castillo St./Montecito St. intersection which would improve the operating condition well above LOS D.

The CMP also includes a transportation demand management (TDM) element aimed at reducing the rate of growth in single occupant vehicle usage. The City of Santa Barbara has adopted a TDM program which meets the most stringent requirements of this element, although the City is not currently required to do so. The Santa Barbara County Association of Governments (SBCAG), authors of the CMP, adopted a determination at their February 18, 1993 meeting which finds that the City of Santa Barbara (among others) is conforming to the adopted Congestion Management Plan.

The CMP contains a land use program that focuses on analyzing proposed development rather than existing land uses. The SBCAG believes that extending the scope of EIR traffic studies to include impacts to the CMP system is the most expeditious way to implement the Land Use Analysis element. The following are thresholds and guidelines for project-level CEQA analysis of CMP system impacts.

Project Size - A project should be evaluated for potential impacts to the "off site" CMP system if total trip generation exceeds 50 peak hour trips or 500 daily trips.

Traffic Assignment - Assignment of trips to the CMP system normally should be carried out no further than two signalized intersections from the project site (excluding signals at non-arterial streets), or to the nearest freeway interchange, regardless of jurisdictional boundaries. The area of project impact may be extended at the discretion of the traffic engineer of SBCAG, subject to an analysis of market area for the proposed use, origin-destination surveys, or similar studies. In no case should project-added volumes less than 10 peak hour trips be considered in analysis of a CMP system impact.

Significant Impacts - The following are guidelines as to what constitutes a significant impact to the CMP system. 1) For any roadway or intersection operation at LOS A or B, a decrease of two levels of service from project-added traffic. 2) For any roadway or intersection operating at LOS C, project-added traffic that results in a LOS D or worse. 3) For intersections on the CMP system with existing congestion, the following table will define significant impacts.

LOS	*Added Peak Trips*
D	*20*
E	*10*
F	*10*

9 Congestion Management Plan, Santa Barbara County, Adopted January 1993.

The proposed project would not create a significant traffic impact, as defined by the criteria above and would, therefore, be considered potentially consistent with the CMP. All potentially significant, adverse impacts to area intersections would be mitigated by extending Salsipuedes Street and by installing traffic signals at the Cabrillo/U.S. 101 Ramps intersection. The intersection of U.S. 101 Northbound Ramps/Milpas Street would be improved above existing conditions as a result of implementing project-required mitigation measures. In addition, the City has just begun improvements to the Castillo/Montecito Street intersection. The reader is referred to the Traffic, Circulation and Parking section for more information.

10.3 County of Santa Barbara Hazardous Waste Management Plan

In 1986, the California legislature passed Assembly Bill 2948 which authorized local governments to prepare a Hazardous Waste Management Plan in order to assure the safe and responsible management of hazardous wastes. The County of Santa Barbara prepared its Hazardous Waste Management Plan in 1988. It is important to note that this plan is concerned primarily with hazardous waste issues and not hazardous materials issues. Hazardous wastes are substances of no further use which need treatment or disposal, or both, while hazardous materials include new and usable substances (such as pesticides and fertilizers). The Plan includes analysis of types and volumes of wastes generated in the County, criteria for new hazardous waste facilities and analysis of waste reduction, recycling and management by small quantity generators.

There are both hazardous waste and hazardous material issues which the proposed project must address due to on-site hazardous waste contamination at all three sites and due to the potential use of hazardous materials (pesticides and fertilizers) at the park and hotel site. The Hazardous Materials/Wastes section of this EIR discusses the potential impacts and requires mitigation measures to reduce impacts to acceptable levels.

There are few policies in the Hazardous Waste Management Plan which deal directly with small quantities of hazardous waste contamination or long-term hazardous material use. The following policies apply to the proposed project.

Policy 4-1 *The County and cities shall encourage and promote practices and technologies that will, in order of priority: 1) reduce the use of hazardous wastes at their source; 2) recover and recycle the remaining hazardous wastes for reuse; and 3) treat those wastes not amenable to source reduction and recycling so that the environment and community health are not harmed by their ultimate release or disposal.*

Policy 4-2 *The County, in conjunction with the cities, shall develop a hazardous waste minimization program to provide adequate information and technical assistance to all hazardous waste generators to ensure that all generators have knowledge of regulatory requirements and effective waste minimization procedures.*

A mitigation measure contained in the Hazardous Materials/Wastes section requires the applicants to prepare and implement an appropriate remediation plan for the hotel and park site in order to reduce contaminant concentrations to acceptable levels. In addition, the applicants would be required to prepare a Hazardous Materials Management Plan, Hazardous Materials Inventory Statement and a Hazardous Materials Business Plan with respect to actual stored quantities of hazardous materials. Given these requirements, the proposed project would be considered potentially consistent with these policies.

Policy 9-1 *The County and cities shall encourage the proper storage of hazardous materials and hazardous waste through continued inspection efforts and public education regarding proper storage methods and regulations.*

See the discussion above under Policy 4-2. Given the requirements of this EIR's mitigation measures, the proposed project would be considered potentially consistent with this policy.

Policy 10-1 *The County and cities should work with other involved agencies to establish a coordinated interagency effort for identification, regulation and mitigation and notification of contaminated sites.*

Policy 10-2 *The County and cities in conjunction with the State Department of Health Services shall encourage on-site treatment and remediation to reduce the transport of hazardous waste for contaminate sites.*

The remediation of the contaminated project sites has been a coordinated, interagency effort between the private property owners, the County and the City. The method for remediation of the park and hotel site has not yet been determined. However, the remediation plans would be reviewed and approved by the County Environmental Health Services Department and on-site remediation could be encouraged at the time of plan review, if it is a feasible option. Therefore, the proposed project would be considered potentially consistent with these policies.

11.0 The Salsipuedes Street Extension

In order to mitigate significant traffic and circulation impacts resulting from the proposed Waterfront Park and Hotel project, it has been proposed that Salsipuedes Street be extended from the lower east side to the Waterfront Area. The extension was originally proposed by the City, but its timing is important to the hotel portion of the site. The implementation of this mitigation measure is considered to be a benefit of this project. The extension will provide the east side area with a direct link to the Waterfront Area, bypassing the congested lower Milpas Street intersections. The Milpas Street/Carpinteria Street/U.S. Highway 101 north-bound off ramp and the Milpas Street/Indio Muerto Street/U.S. Highway 101 south-bound on ramp intersections are currently experiencing heavy congestion at peak traffic hours. The proposed Salsipuedes Street extension would alleviate some of this congestion. (Refer to the Traffic Section, V. A, for the specific trip reduction data.)

According to the California Environmental Quality Act Guidelines, Section 15126. (c), the indirect impacts of mitigation measures must also be addressed in the environmental analysis of a project. Therefore, the following brief discussion focuses on the potential indirect land use effects that may occur as a result of the extension of Salsipuedes Street.

The Salsipuedes Street extension would be potentially consistent with the General Plan and the Local Coastal Plan policies that were previously discussed in depth in this section. However, other indirect land use impacts could occur as a result of the implementation of this mitigation measure. The reduction of traffic trips on Milpas Street could in effect draw traffic trips from Milpas Street or "free up" a small amount of capacity along this roadway, thereby removing an obstacle to growth and increasing the potential for the lower Milpas area to accommodate additional commercial square footage as allowed by the provisions of Charter Sections 1507 and 1508. Therefore, the extension has the potential to be construed as indirectly growth inducing.

The City's commercial growth is governed by Charter Section 1508, which limits the total developable commercial square footage of the City. It limits the amount of increased commercial square footage that can occur and it requires that any addition of square footage must not result in any significant water or traffic impacts. In that the extension of Salsipuedes Street would slightly reduce traffic impacts at critical intersections of Milpas Street, there may be increased development potential along the Milpas corridor and in the lower Eastside in general. The City and its Redevelopment Agency encourage commercial and retail revitalization of the lower Milpas area, so this may be considered a beneficial indirect growth inducing impact. However, this potential effect is somewhat speculative and it is difficult, if not impossible, to determine the overall land use changes that would occur along Milpas Street corridor as a result of the Salsipuedes Street extension. Charter Section 1508, not the Salsipuedes Street extension, is the major land use tool governing the future development of the Milpas Street corridor and the lower Eastside in general. Additionally, as discussed in Section V. A., Traffic, Circulation and Parking, the reduction in traffic trips resultant from the extension is sufficient to mitigate the impacts of the project with cumulative traffic. However, even with the extension of Salsipuedes, the levels of service (LOS) of critical intersections on lower Milpas Street would still exceed the City's maximum volume to capacity ratio (V/C ratio) threshold (0.77 V/C, LOS C) and remain between 0.79 and 0.83 V/C. This continued threshold exceedance does not render the Salsipuedes Street extension a significant trip reducer for the lower Milpas area. Slight trip reduction will occur, but only enough to mitigate project impacts. If Garden Street were improved also, as recommended by the traffic consultant for this project, then a significant trip reduction on Milpas Street would occur and the potential indirect land use changes that may result would be more apparent. It is not now required that Garden Street be extended as a result of this project, due to the lack of a clear nexus between the improvement and the proposed project impacts. However, the extension of Garden Street is planned and will likely occur within the next few years. Therefore, the traffic trips that will be drawn from critical intersections of the lower Milpas Street area to the new Salsipuedes Street would not be considered a significant, growth inducing effect on the land uses of the lower Milpas area.

VI. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A. TRAFFIC, CIRCULATION AND PARKING

1.0 Environmental Setting

This section is based on a report prepared by Omni-Means Engineers/Planners, entitled "Transportation Analysis for Waterfront Project" dated February 1993. The report, which was prepared specifically for this EIR, has been included in its entirety with minor modifications made to the format and text. The substance of the report has not been amended and an original copy of the report is on file for public review at the City Community Development Department. Supporting material referenced in the appendix of the Omni-Means report is provided as Appendix C of the EIR.

1.1 Existing Street Network

The park and hotel project site is located on the north side of Cabrillo Boulevard between Salsipuedes and Santa Barbara Streets. Local access is provided by a grid network of streets which generally extend in the northwest and northeast directions from the Waterfront . Streets that provide direct and indirect access to the project include Highway 101, Cabrillo Boulevard, Castillo Street, State Street, Santa Barbara Street, Milpas Street, Calle Puerto Vallarta, Indio Muerto Street and Yanonali Street. Figure 2 contained in the Project Description shows the project vicinity and a brief description of each road follows.

Highway 101 provides regional access throughout the Santa Barbara Area. Improvements were recently completed through the central area between Castillo Street and Milpas Street which eliminated the previous at-grade cross-street intersections. Administered by the California Department of Transportation (Caltrans), Highway 101 consists of three travel lanes in each direction west of the Milpas Street interchange/bridge, narrowing to two travel lanes in each direction east of Milpas Street. Highway 101 provides indirect access to the project site via interchanges at Castillo Street, Garden Street and Milpas Street.

Cabrillo Boulevard is a four-lane arterial street extending from Castillo Street easterly along the City's central Waterfront Area. Cabrillo Boulevard is the only through route serving the Waterfront. West of Castillo Street, Cabrillo Boulevard becomes Shoreline Drive. To the east, Cabrillo Boulevard intersects Highway 101 at a freeway interchange, then extends further east becoming Coast Village Road. Cabrillo Boulevard provides access to the project site from the intersecting streets of Salsipuedes Street and Santa Barbara Street. Key intersections are at Castillo Street (signalized), State Street (signalized), Santa Barbara Street (signalized), Salsipuedes Street (signalized), Ninos Drive (stop control for Ninos approach) and the Highway 101 southbound ramps-northbound offramp (four-way stop control). Cabrillo Boulevard is a state highway (State Route 225).

Castillo Street is a two to four lane arterial street which extends northwest from Cabrillo Boulevard at the Waterfront through an interchange with Highway 101 into the Downtown area. Castillo Street is a primary access route from Highway 101 to the Waterfront (and project site) Area. Prominent intersections, which are all signalized, include Haley Street-Highway 101 northbound on-ramp, Highway 101 southbound

ramps, Montecito Street and Cabrillo Boulevard.

State Street is a primary arterial street which extends inland from Cabrillo Boulevard through the Downtown area. State Street consists of two lanes through the Downtown core area and widens to four lanes as it continues inland and from the freeway to Cabrillo Boulevard. At the State Street/Cabrillo Boulevard intersection, the Stearns Wharf pier extends south from the terminus of State Street creating a four-approach intersection.

Santa Barbara Street is a route which extends northwesterly from Cabrillo Boulevard to the freeway. Santa Barbara Street is blocked at the freeway. At the Santa Barbara Street/Cabrillo Boulevard intersection, a public parking lot extends south from the terminus of Santa Barbara Street, creating a four-approach intersection.

Salsipuedes Street consists of two segments on opposite sides of the railroad tracks through the Waterfront Area. North of the tracks, Salsipuedes Street extends underneath Highway 101 and through the industrial area of the Eastside, paralleling other through streets such as Milpas Street and State Street. South of the railroad tracks, Salsipuedes extends south a short distance to Cabrillo Boulevard where it terminates. This latter section is currently a two lane road which provides access to the northern driveway of the Red Lion Resort. Salsipuedes Street presently is not connected across the Southern Pacific Railroad tracks. The proposed project's access driveway would be located on the northwest side of this street.

Milpas Street is an arterial street extending northwest from Cabrillo Boulevard and is a primary through route from the easterly area of the Waterfront through the Eastside commercial area of the City. Milpas Street provides four-travel lanes along its length, except for a two-lane section between Cabrillo Boulevard and Highway 101. Key intersections (all signalized) are at Highway 101 northbound ramps-Carpinteria Street, Highway 101 southbound off-ramp, Highway 101 southbound on-ramp-Indio Muerto Street, Calle Puerto Vallarta and Cabrillo Boulevard.

Garden Street is located one block east of Santa Barbara Street and parallels Santa Barbara Street through the Downtown. As part of the completed freeway improvements, Garden Street was extended to Yanonali Street and freeway access was provided at a grade-separated diamond interchange with Highway 101. Access to Cabrillo Boulevard and the Waterfront Area from Garden Street is provided by Santa Barbara Street, which extends from Yanonali to Cabrillo Boulevard.

Calle Puerto Vallarta extends northeasterly from Cabrillo Boulevard across Milpas Street toward Highway 101. It is a two lane road with key intersections at Cabrillo Boulevard and Milpas Street, both of which are signalized.

Indio Muerto Street is a two lane road extending east from Milpas Street which serves as the southbound Highway 101 on-ramp from Milpas Street.

1.2 Study Intersections and LOS Concepts

Existing traffic conditions were determined to establish a base for assessing project and cumulative traffic impacts. In order to determine peak hour operating conditions on streets in the project vicinity, both weekday and weekend peak hour turning movement counts were obtained for sixteen key intersections within the project site vicinity (Associated Transportation Engineers, traffic counts conducted August 16-

23, 1992). The peak hours were established as Friday evening between 4:15-6:00 p.m. and Sunday afternoon between 1:00-3:00 p.m. While these time periods represent very different trip purposes and travel patterns, each period reflects heavy traffic flows. It is noted that the Sunday counts were conducted during the summer season and therefore represent peak weekend conditions in the Waterfront Area. During off-peak weekends, traffic volumes in the Waterfront Area would be lower. Similarly, the Friday evening peak hour is the highest volume that would be expected during the weekdays. These comparisons suggest that the time periods used in this traffic analysis provide conservative assessments of existing and projected traffic flow conditions.

The peak hour turning movement counts were conducted at the sixteen following intersections:

1. Castillo Street/Haley Street-Highway 101 Northbound On-ramp
2. Castillo Street/Highway 101 Southbound Ramps
3. Castillo Street/Montecito Street
4. Castillo Street/Cabrillo Boulevard
5. Cabrillo Boulevard/State Street
6. Cabrillo Boulevard/Santa Barbara Street
7. Cabrillo Boulevard/Salsipuedes Street
8. Cabrillo Boulevard/Calle Puerto Vallarta
9. Cabrillo Boulevard/Milpas Street
10. Cabrillo Boulevard/Highway 101 Southbound Ramps-Northbound Off-ramp
11. Milpas Street/Highway 101 Northbound Ramps-Carpinteria Street
12. Milpas Street/Highway 101 Southbound Off-ramp
13. Milpas Street/Highway 101 Southbound On-ramp-Indio Muerto Street
14. Milpas Street/Calle Puerto Vallarta
15. Garden Street/Highway 101 Northbound Ramps
16. Garden Street/Highway 101 Southbound Ramps

Level-of-service (LOS) is the primary indicator for traffic operation performance at intersections.[10]

LOS "A" represents free-flow conditions with little or no delay (zero to five seconds) at signalized intersections. LOS "E" characterizes extremely unstable flow conditions and severe congestion with volumes at or near the designed capacity. Vehicles are likely to experience major delays (40 to 60 seconds) crossing an intersection. Minor incidents may lead to forced flow conditions (LOS "F") with operating volume substantially below capacity. This results in long queues backing up from all approaches to intersections.

The LOS methodology generally provides an accurate measure of intersection performance, although other factors may affect or constrain the actual intersection performance. One factor associated with some of the Waterfront intersections is pedestrian traffic. If considerable pedestrian activity exists, then vehicle flow

10 At a signalized intersection, LOS is determined by calculating the volume of conflicting traffic movements at an intersection during one hour and dividing that total by the capacity designed to accommodate those turning movements. The resulting calculations are expressed by average delay and LOS ratings which range from LOS "A" to "F". The range describes increasing traffic demand, delays, and deterioration of services (see Appendix C).

capacity through the intersection may decrease.[11]

At intersections where all approaches are stop-sign controlled (four-way or three-way stops), the LOS definitions reflect overall delays similar to those described for signalized locations. However, if volumes are substantially "unbalanced" between the intersection legs, vehicles on the highest volume approach would experience disproportionate delays.

As outlined in the City's 1988 Circulation Element, it is the goal that signalized intersections not exceed LOS "C" (V/C=0.80) at most locations and LOS "D" (V/C=0.90) at Caltrans intersections. However, for the purposes of a traffic impact assessment, LOS "C" (V/C=0.77) is the "threshold" against which project impacts are measured. If a project causes an intersection V/C to exceed 0.77 or if a project adds 0.01 to an intersection already exceeding 0.77, the project's traffic impact could be significant.

The following study intersections are also designated a part of the Santa Barbara County Congestion Management Program:

- Milpas/101 NB/Carpinteria
- Milpas/101 SB off-ramp
- Garden/101 NB
- Garden/101 SB
- Castillo/101 NB/Haley
- Castillo/101 SB
- Cabrillo/Milpas
- Cabrillo/State
- Castillo/Cabrillo
- Castillo/Montecito

1.3 Existing Traffic Flow Conditions

The signalized intersections were analyzed using the Transportation Research Board Circular 212 Critical Movement Analysis. This analysis incorporates the effects of the lane geometry and traffic signal operation with the results described by the level of service scale as indicated by a vehicle to capacity ratio. Four-way stop-sign controlled calculations were analyzed using AWSC-ALL, Version 1.1, Intersection Capacities. (Intersection calculation worksheets are provided in the report appendices which are on file at the City Community Development Department.) The peak hour level of service findings at the study intersections are summarized in Table VIA-1 and the existing traffic volumes are shown in Figures VIA-1 and VIA-2.

As Table VIA-1 indicates, most of the intersections are operating satisfactorily (LOS "C" or better) overall during both weekday and weekend peak hours, although certain intersections and specific turning movements experience longer delays. Eleven of the signalized intersections operate at LOS "B" or better during both peak hours.

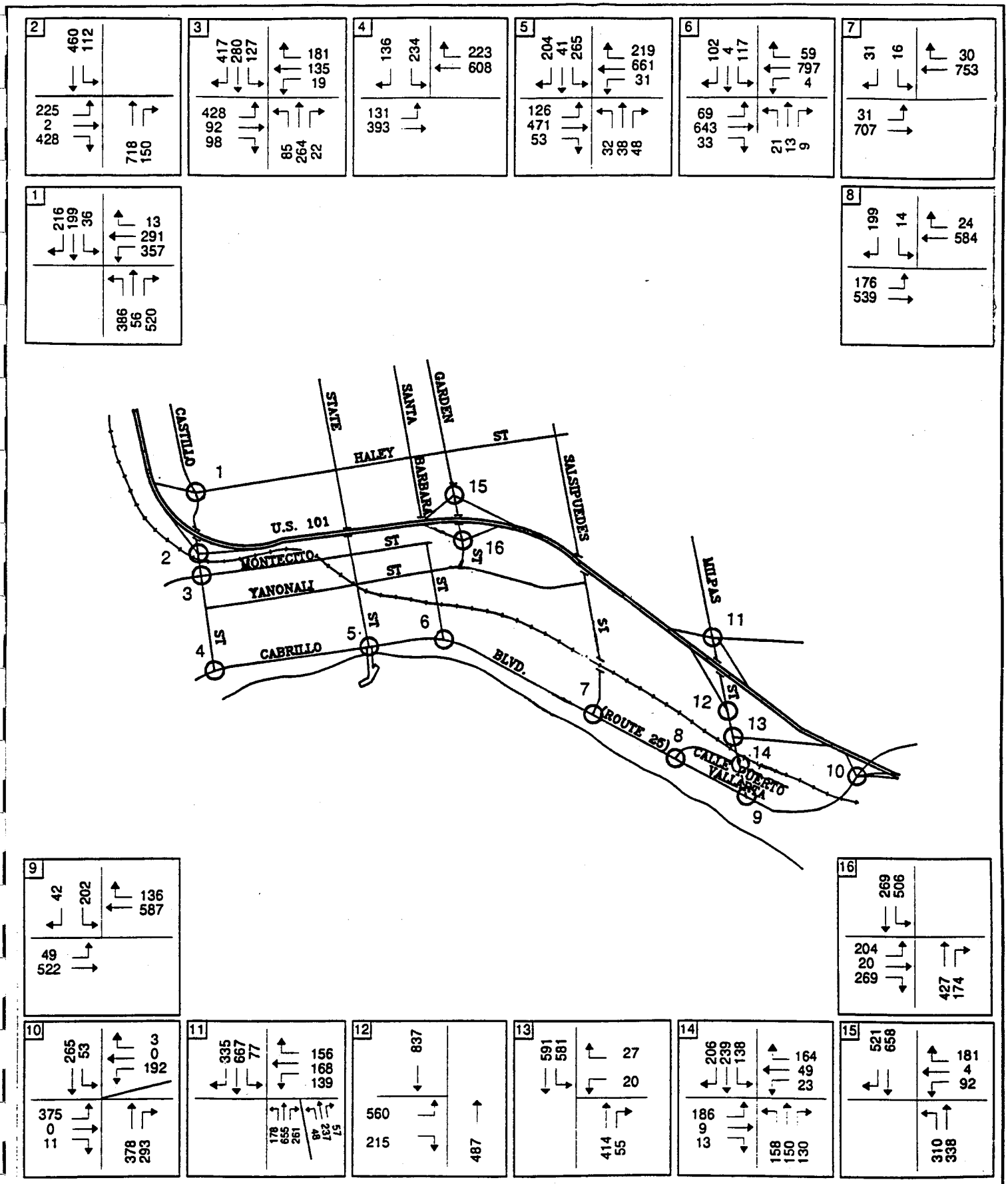
[11] The reduced capacity occurs when pedestrian activity in a crosswalk at the intersection adversely affects the vehicular left or right-turn movement. In order to account for the potential effect of pedestrian activity on an intersection's operation, pedestrian volumes were recorded and, using published factors by the Transportation Research Board, right-turn volumes were adjusted to reflect the delays encountered in turning across the pedestrian flows.

TABLE VIA-1
EXISTING PEAK HOUR INTERSECTION OPERATING CONDITIONS
LEVEL OF SERVICE AND VOLUME/CAPACITY (V/C) RATIO

Intersection	Control Device	Friday Peak LOS	Friday Peak V/C	Sunday Peak LOS	Sunday Peak V/C
1. Castillo/101 NB/Haley	S	B	0.64	A	0.40
2. Castillo/101 SB	S	A	0.56	A	0.51
3. Castillo/Montecito	S	C	**0.78**	C	0.77
4. Castillo/Cabrillo	S	A	0.55	B	0.60
5. Cabrillo/State	S	B	0.61	C	0.71
6. Cabrillo/Santa Barbara	S	A	0.42	B	0.62
7. Cabrillo/Salsipuedes	S	A	0.31	A	0.50
8. Cabrillo/Puerto Vallarta	S	A	0.43	B	0.64
9. Cabrillo/Milpas	S	A	0.43	A	0.53
10. Cabrillo/101	**U**	**F**	**N.A.**	**F**	**N.A.**
11. Milpas/101 NB/Carpinteria	**S**	**D**	**0.85**	B	0.69
12. Milpas/101 SB Offramp	S	**A***	**0.48**	A	0.38
13. Milpas/101 SB On-Indio Muerto	S	C	0.77	B	0.63
14. Milpas/Puerto Vallarta	S	A	0.54	A	0.52
15. Garden/101 NB	S	A	0.58	A	0.31
16. Garden/101 SB	S	B	0.68	A	0.40

Control Device: S = Signalized, U = Unsignalized, N.A. = Not Applicable; Unsignalized intersection does not yield V/C ratio.

*During portions of the Friday peak hour, congestion at Milpas/101 NB-Carpinteria causes vehicles to back up through the Milpas/101 SB off-ramp intersection. At times this intersection operates in the LOS E-F range.



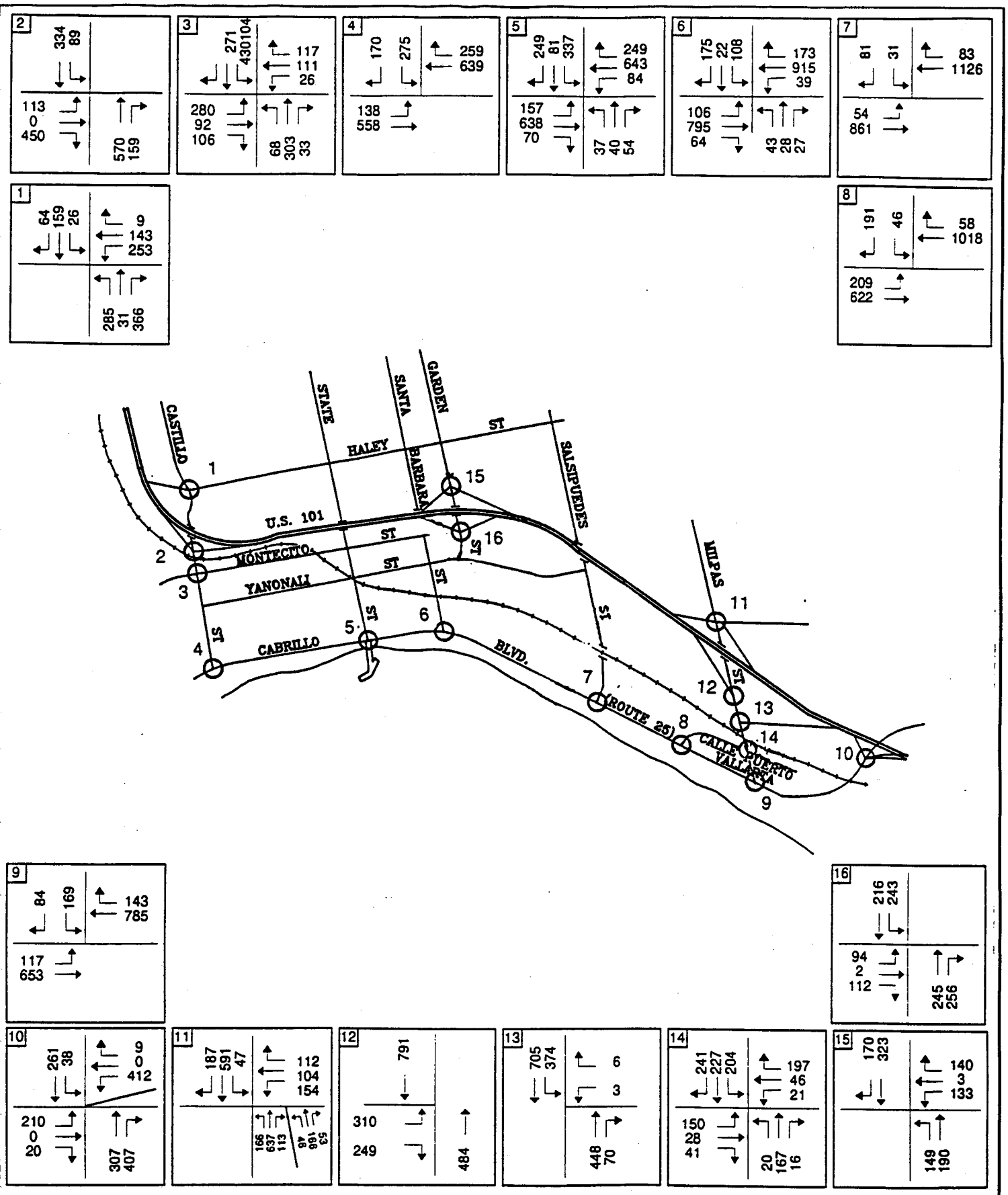
NOT TO SCALE

SOURCE: Omni-Means

FIGURE VIA-1

EXISTING FRIDAY PM PEAK HOUR VOLUMES

INTERFACE



NOT TO SCALE

SOURCE: Omni-Means

FIGURE VIA-2

EXISTING SUNDAY PM PEAK HOUR VOLUMES

INTERFACE

During the weekday peak hour, the signalized intersections of Cabrillo Boulevard/Castillo Street, Cabrillo Boulevard/Santa Barbara Street, Cabrillo Boulevard/Salsipuedes Street, Cabrillo Boulevard/Calle Puerto Vallarta and Cabrillo Boulevard/Milpas Street operate at LOS "A", while the intersection of Cabrillo Boulevard/State Street operates at LOS "B".

During the weekend peak hour, operating conditions remain at LOS "A" at Cabrillo Boulevard/Salsipuedes Street and Cabrillo Boulevard/Milpas Street. The intersections of Cabrillo Boulevard/Castillo Street, Cabrillo Boulevard/Santa Barbara Street and Cabrillo Boulevard/Calle Puerto Vallarta operate at LOS "B" conditions, while the Cabrillo Boulevard/State Street intersection operates at LOS "C". The decline in operating conditions along Cabrillo Boulevard on weekends primarily reflects the increased pedestrian volumes. As described above, the intersection volumes have been adjusted to reflect the pedestrian traffic influence on operating conditions. As the LOS levels indicate, even with the weekend pedestrian traffic, the Cabrillo Boulevard intersections operate efficiently without significant delays.

The Cabrillo Boulevard/State Street intersection weekend operating conditions vary depending on the number of vehicles able to make a right turn during the "red" phase. The actual operating conditions at Cabrillo Boulevard/State Street indicate that pedestrian volumes reduce the number of right turns on red. Although the effect pedestrian volumes have on intersection vehicle capacity has been accounted for in the LOS calculations, the inherent fluctuations in pedestrian volumes suggest that this intersection could at times operate worse than the LOS calculation indicates.

The Castillo Street/Montecito Street intersection operates at LOS "C" during the Friday and Sunday peak hours. The relatively high volumes for all the approaches in combination with a lack of separate left turn lanes on Castillo Street limits the intersection's capacity. The Friday peak hour v/c ratio exceeds the threshold of significance for signalized intersections (it operates at v/c 0.78; the threshold is v/c 0.77). Improvement plans for this intersection have already been approved and implementation is pending.

The remaining intersections along Castillo Street of Castillo Street/Highway 101 north-Haley Street and Castillo Street/Highway 101 south experience uncongested conditions and operate with little delay. The northbound to eastbound right-turn movement is high, but because it has a free right-turn lane, it does not significantly affect the intersection operating conditions.

The intersection operating conditions along Milpas Street are primarily a function of the Highway 101 interchanges. The Milpas Street/Highway 101 northbound ramps-Carpinteria Street intersection operates at LOS "D" (V/C = 0.85) during the Friday peak hour, affected by heavy volumes on Milpas Street and the inherent inefficiency of a five-legged intersection operation. At the Milpas Street/Highway 101 southbound Onramp-Indio Muerto Street intersection, the heavy left-turn volume from Milpas Street onto the on-ramp results in longer delays during the peak hour. The Milpas Street/Highway 101 southbound off-ramp generally operates efficiently, but due to the proximity of the Milpas/101-Carpinteria intersection, the left-turn from the off-ramp is predicated on north/east Milpas through traffic clearing the Milpas/101 north intersection. Milpas Street experiences particularly heavy through traffic volumes due to the limited number of surface-streets in the area which cross Highway 101.

The Garden Street interchange at Highway 101 was created as part of the cross-town freeway improvements which eliminated the traffic signals and at-grade intersections that existed through this section of Highway 101. The northbound intersection operate at LOS "A" during the weekend peak hours and the southbound intersection operates at LOS "B" during weekday peak hours. South of the freeway, Garden Street terminates at Yanonali Street. As previously noted, an application for a future extension of Garden Street to Cabrillo Boulevard has recently been submitted by the City's Public Works staff to the

Planning Division. This extension is depicted in Figure 4, Park and Hotel Site Plan.

The Cabrillo Boulevard/Highway 101 northbound off-ramp-southbound ramps intersection experiences significantly poor operating conditions during both peak hours. The four-way stopped intersection carries heavy volumes which are inefficiently accommodated by the multi-way stop-sign control. It is noted that in addition to intersection operating delays, north-south through traffic on State, Santa Barbara and Milpas Streets can be delayed by train traffic. Presently, only one train (the Coast Starlight) passes through the area during the weekday peak hour. While these movements are disruptive to traffic flow, the total closure of 2 minutes during the hour does not measurably affect the overall traffic carrying capacity of these streets.

1.4 Traffic Signal Assessment

Peak hour signal warrant analyses were conducted for the unsignalized Cabrillo Boulevard/Highway 101 ramps intersection (signal warrant calculation worksheets are available at City offices). The peak hour signal warrant refers to minimum traffic volume thresholds identified by Caltrans.[12] When an intersection's peak hour volumes exceed the minimum thresholds, a traffic signal could be warranted. Intersections which qualify for signalization under the peak hour criteria would require further analyses of accident history, proximity of other intersections/driveways and potential volume increases. All of these factors should be examined before a signal is actually installed. Based upon the peak hour conditions, current volumes at Cabrillo Boulevard/Highway 101 ramps substantially exceed the minimum level for signal warrants.

1.5 Thresholds of Significance

The City's guidelines state that the addition of project traffic shall not increase a V/C above 0.77. Any project-related traffic that adds traffic to an intersection at or above this level for cumulative conditions would result in a significant impact. On a project-specific basis, significant impact is identified when the volume to capacity ratio changes by 0.01.

2.0 Impact Analysis

The proposed project would involve construction of three components, consisting of the development of a 10-acre public park, a 150-room luxury hotel and a 75-bed hostel. The park and hotel would be located on the same site, along the northerly side of Cabrillo Boulevard between Salsipuedes Street and Santa Barbara Street. The hostel would be located approximately 3,000-feet west of the park/hotel site, on a separate parcel adjacent to Highway 101 on West Montecito Street.

2.1 Short-term Construction Impacts

The most pronounced construction traffic effects would be generated during the grading phases of the various project components. At the park/hotel site, 23,100 cubic yards would be excavated for the hotel portion of the site and 39,500 cubic yards of fill would be required for the park portion of the site grading.

[12] U.S. Department of Transportation, Federal Highway Administration, Manual on Uniform Traffic Control Devices, Revision No.4, March 1986.

As these quantities suggest, the park component of the project would require a net importation of 16,400 cubic yards of material. In addition, 2,600 cubic yards of cleared and grubbed material would be removed during the first two weeks of the excavation process. At the youth hostel site, earthwork would be limited to 2,000 cubic yards of imported fill.

2.1.1 Park and Hotel

During the first two or three weeks of construction on the hotel and park site, about 3-5 daily trucks would remove cleared and grubbed material from the site.[13] These 3-5 daily trucks would not be measurable within the background traffic flows. The park/hotel earthwork would occur over a 2.5 month (about 50 working days) period. During this process, about 27 round trips (54 one-way trips) would be generated each day. With truck operation 8-9 hours each day, 6-7 one-way truck trips would be generated each hour. This volume would not have a measurable effect on the background traffic volumes on the adjacent street network. However, trucks are slower moving and the truck traffic could be disruptive to normal traffic flows. In addition, the trucks would arrive at the site and may have to temporarily queue before unloading their fill material. If this queuing were to occur along Cabrillo Boulevard, traffic flows along Cabrillo could be adversely affected. **Therefore, earthwork associated with the development of the proposed park and hotel site would cause potentially significant adverse short-term traffic impacts.**

There is no available estimate of construction employment expected with this project. **However, construction employees could seek parking along Cabrillo Boulevard, which may have a significant adverse impact on the parking available for other Waterfront visitors.**

2.1.2 Hostel

At the youth hostel, the 2,000 cubic yards of fill would generate only 4-5 trucks (8-10 one way trips) daily, assuming the same two month earthwork period. This activity would be very limited and it is not expected that any measurable traffic or queuing problems would occur. Therefore, development of the proposed hostel would not result in potentially significant adverse short-term traffic impacts.

2.2 Project Trip Generation and Project-Specific Traffic Impacts

In determining the projected traffic to be generated by the proposed project, input from Santa Barbara City staff was incorporated with national, state and local research on trip generation of similar land uses. These calculations were further adjusted to account for other factors relevant to this particular project. One factor is that a portion of the project trips would represent secondary trips as opposed to primary trips. That is, some patrons would already have traveled to the area for another purpose but would also use portions of the project site. Also, the trip generation was adjusted to reflect the current traffic being generated by the existing site. The net trip generation therefore reflects the deductions made for these adjustment factors.

13 2,600 cubic yards would be cleared for 10-15 days and would be hauled away in trucks with 54 cubic yard capacity, according to Mike Cacesse of Penfield and Smith Engineers.

2.2.1 Hotel and Park Project Trip Generation

The trip generation for the 150-room hotel was obtained by comparing published rates by ITE with driveway count data collected at the existing Santa Barbara Red Lion Resort.[14] The calculated hotel ortion of the site trip totals were reduced to account for trip ends previously generated by the site. The existing trip ends are the trips which were generated by land uses which existed on the site at the time the Specific Plan was approved. These existing trip figures were obtained from the Fiesta Park Project EIR. Subtraction of the existing 20 weekday p.m. peak hour trips result in 88 net new p.m. peak hour trips. Subtracting the existing 12 weekend p.m. peak trips results in 119 net new p.m. trips.

The anticipated park activities and their associated level of use were calculated from data collected by the City and surveys conducted by Omni-Means. Primary use areas within the park portion of the site include the Plaza, Pump House, Pavilion/Meadow and Carousel. The maximum anticipated use during the weekend p.m. peak hours (12:00-5:00 p.m.) were anticipated to be as follows: The Plaza- General Public Use with 10 people and Community Events with 100 people; The Pump House- Meetings with 50 people; and The Pavilion/Meadow-General Public Use with 30 people and Special Group Use (requires reservations) with 500 people. The traffic trips generated by the carousel are taken from a survey of carousel uses in California prepared for the Fiesta Park project previously prepared for this site.

Converting into peak hour trip generation, the 690 people were apportioned over the five peak hours between noon and 5:00 p.m., resulting in an average of 138 people per hour entering or leaving the three areas. However, in order to be conservative, an adjustment factor of 1.5 was applied in order to account for the possibility that the usage may not be evenly spread throughout the afternoon. This factor results in 207 people leaving or entering these areas in a given hour. Using input from City staff, this number was reduced 50-percent to discount for the number of people already at the Waterfront and not creating new vehicle trips, resulting in approximately 104 net new people using these areas in the highest hour. Research on auto occupancies at Picnic and Beach areas from the California State Department of Transportation (Caltrans) indicates an average vehicle occupancy of 3.4 people per vehicle. Applying this to the 104 people results in 31 vehicles. With two one-way trips per vehicle (31 in, 31 out), 62 vehicle trips would be generated for these areas of the park in the peak hour.

Weekday park use is generally low compared to weekend use. The maximum anticipated use during the weekday p.m. peak hours (4:00-6:00 p.m.) for the Plaza, Pump House and Pavilion/Meadow areas was anticipated to be 70 people. This was apportioned over two hours, resulting in 35 people on/off these areas in a given hour. Applying the adjustment factors by increasing 1.5 times to account for uneven arrival/departure rates, 50-percent reduction for people already at Waterfront Area and an average auto occupancy of 3.4 people results in 16 trips (8 in, 8 out) for these park areas in the weekday peak hour.

The proposed carousel would also generate trips simultaneously with the other areas of the park portion of the site. The carousel trip rates were based on surveys at an existing carousel (within a similar development) in San Diego, as documented in a previous study by Omni-Means. Peak hour surveys were conducted to determine the mode of transportation carousel riders used. The carousel users were interviewed during the peak hours of the carousel operation. On weekdays, the carousel would generate 222 daily trips and 22 p.m. peak hour trips, with 50-percent (11 vehicles) entering and 50-percent (11

[14] Institute of Transportation Engineers, Trip Generation, Fifth Edition, 1991. The published trip rates are based on the number of guest rooms, but the rates account for other hotel uses typically available, such as restaurants, lounges, meeting rooms and retail or other service shops. As shown in Table 2, the hotel would generate approximately 108 p.m. peak hour trips, with 55-percent (59 vehicles) entering and 45-percent (49 vehicles) exiting, on an average weekday. On weekends, the hotel would generate approximately 131 p.m. peak hour trips, with 50-percent (66 vehicles) entering and 50-percent (65 vehicles) exiting.

vehicles) exiting. On weekends, the carousel would generate 595 daily trips and 34 p.m. peak hour trips, with 50-percent (17 vehicles) entering and 50-percent (17 vehicles) exiting. The park portion of the site as a whole would therefore generate approximately 38 p.m. peak hour weekday trips. On weekends, the park portion of the site would generate 96 p.m. peak hour trips.

2.2.2 Hostel Project Trip Generation

The hostel project is proposed to consist of 75 beds. Trip generation rates were calculated in a previous report using survey data of guests at an existing hostel located in Santa Monica. It should be noted that the hostel in Santa Monica, while close to bus service and cycling routes, is some distance from railroad stations in downtown Los Angeles. Therefore, guests arriving by automobile are likely to result in a higher percentage of total guests. This results in a conservative estimate of traffic generation for this proposed hostel. The survey concluded that vehicle trips represent approximately 25-percent of the total kinds of arrival modes. Applying the 25-percent rate to 75 guests, the hostel trip calculations yielded 19 arrival trips, 19 departure trips and 38 miscellaneous trips per day. Adding 24 employee trips per day (6 employees at 4 trips per day), the hostel is calculated to generate approximately 100 vehicle trips per day. With approximately 9-percent of the daily trips occurring during the p.m. peak hour (based on ITE hotel rates), nine vehicle trips would be generated during the p.m. peak hour. Information from the Hostel Association indicates no significant difference between weekday and weekend trip generation characteristics; therefore, the same rate was used for both scenarios.

2.2.3 Total Project Trip Generation

As shown in Table VIA-2, the combined hotel, hostel and park uses would generate 135 p.m. peak hour trips on weekdays, with 72 vehicles entering and 63 vehicles exiting. On weekends the combined project would generate approximately 224 p.m. peak hour trips, with 113 vehicles entering and 111 vehicles exiting. These net trips have been used in the impact analysis.

Table VIA-2
Project Trip Generation

Hotel Trips

	Weekday				Weekend			
	Daily		P.M. Peak		Daily		P.M. Peak	
Project Component	Rate	Trips	Rate	Trips	Rate	Trips	Rate	Trips
Hotel (150 Rooms)	8.64	1,296	0.72	108	10.50	1,575	0.87	131
Less Existing Trips				-20				-12
Net Hotel Trip Generation:				88				119

Table VIA-2
Project Trip Generation (Continued)

Park Trips

			Friday PM Peak			Sunday Peak
Plaza:			10 persons			110 persons
Pump House:		+	30 persons		+	50 persons
Pavilion/Meadow		+	30 persons		+	530 persons
Total:			70 persons			690 persons
Peak Hours Observed	/2	=	35 persons/hr	/5	=	138 persons/hr
Adjustment Factor	x 1.5	=	52.5	x 1.5	=	207
Secondary Trip Factor	x 0.5	=	26.25	x 0.5	=	104
Auto Occupancy	/3.4	=	8 vehicles	/3.4	=	31 vehicles
Trips Per Vehicle	x2	=	16 trips	x2	=	62 trips
Carousel		=	22 trips		=	34 trips
Total Peak Hour Park Trips		=	38 trips		=	96 trips

Hostel Trips

75 Guests x 0.25*	= 19 arrival trips per day
	= 19 departure trips per day
	+ 24 employee trips per day (6 employees x 4 trip ends)
	+ 38 miscellaneous guest trips (@ 2 trips/guest vehicle)
Total trips per day	= 100 Daily trips (Friday & Sunday)
Total Peak hour trips	= 9 Peak hour trips (Friday & Sunday) (9% of Daily)

Total Project Peak Trips

	Friday Peak	Sunday Peak
Hotel	= 88	= 119
Park	= 38	= 96
Hostel	= 9	= 9
Total Peak Trips	**= 135 (72 in, 63 out)**	**= 224 (113 in, 111 out)**

Total Net Project Daily Trips*

	Weekday	Weekend
Hotel	= 1,096	= 1,455
Park	= 382	= 1,215
Hostel	= 100	= 100
Total Daily Trips	**= 1,578**	**= 2,770**

* Appendix C contains the calculation sheet which explains how these daily trips were calculated.

2.3 Project Traffic Impacts

2.3.1 Hotel Trip Distribution

The project trips generated by the hotel portion of the proposed project were distributed onto the street system using the distribution percentages listed from the Ocean Palms Hotel project report, as is shown in Table VIA-3.[15] Within the immediate area of the project, distribution at the access locations was determined by the location of the individual building, existing traffic volumes, freeway access and internal circulation.

Table VIA-3
Hotel Trip Distribution

Street	Percentage	Street	Percentage
U.S. 101 North	20%	Garden Street	10%
U.S. 101 South	30%	Shoreline Drive	3%
Cliff Drive	1%	Milpas Street	6%
Montecito Street	1%	Coast Village Road	3%
Castillo Street	1%	Cabrillo Boulevard	10%
State Street	15%		

2.3.2 Park Trip Distribution

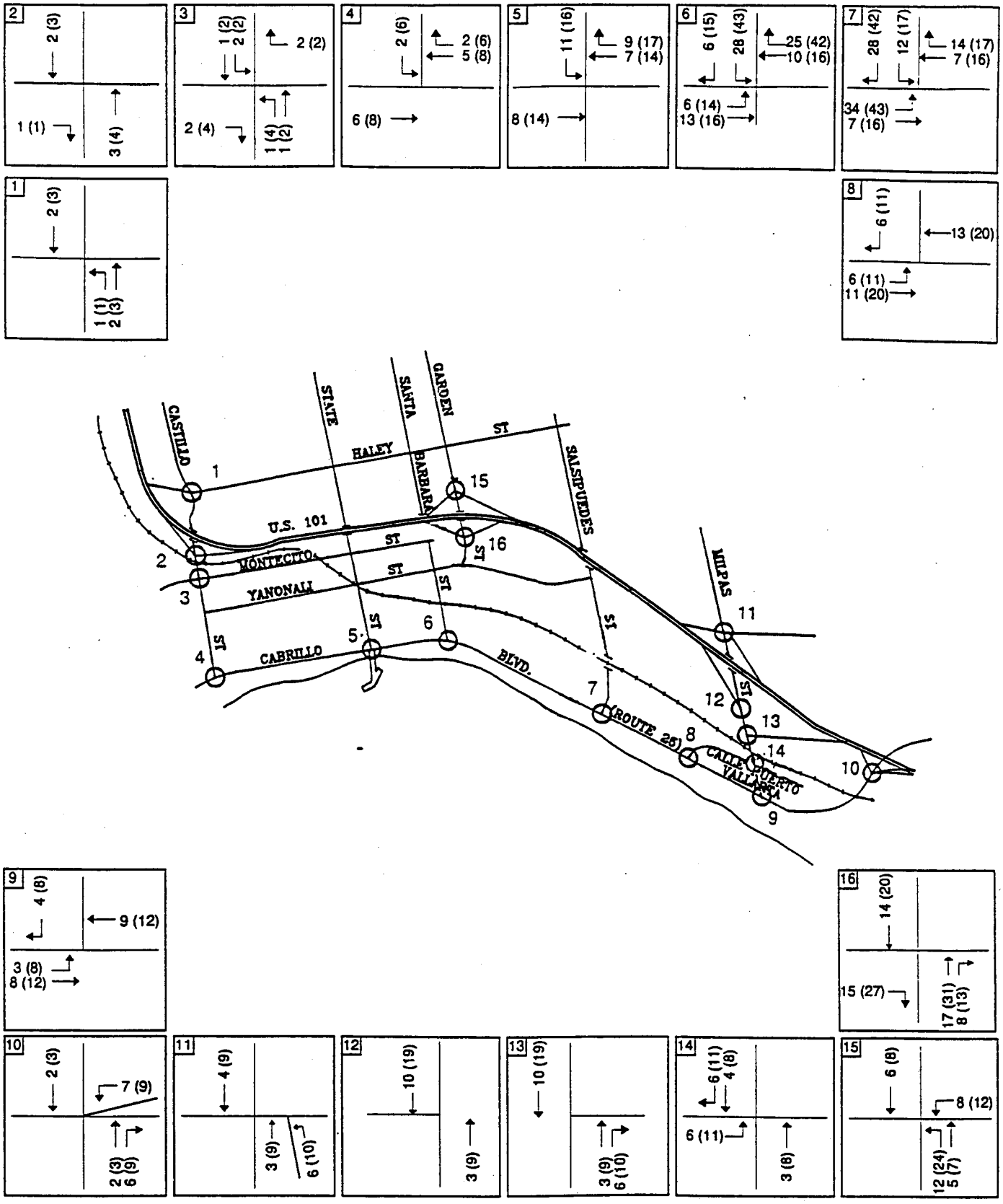
Distribution of the park trips onto the street system was derived from the basic directional percentages established in the Waterfront Area Traffic Study prepared by the City of Santa Barbara in 1979, as is shown in Table VIA-4. Using the basic distribution patterns, project trips were assigned through the intersections included in this impact analysis. The assignment resulted in trips being added to specific through and turning movements at intersections. This study established the directional distributions outlined as follows:

Table VIA-4
Park Trip Distribution

Street	Percentage	Street	Percentage
Cliff Drive	4%	State Street	4%
U.S. 101 North	33%	S.B./Anacapa Streets	4%
U.S. 101 South	26%	Shoreline Drive	2%
Castillo Street	3%	Milpas/Salsipuedes	19%
Chapala Street	2%	Hot Springs	3%

The total peak hour project trips were distributed onto the street network and are shown in Figure VIA-3.

15 Ocean Palms Hotel Project Trip Generation and Traffic Impact Analysis, Associated Transportation Engineers, 1989. The distribution percentages were derived from the traffic study prepared for the Radisson Hotel Project, which is proposed to be located in the Waterfront Area on Cabrillo Boulevard, and from information contained in the Santa Barbara County Transportation Study trip tables for the Waterfront Area.



NOT TO SCALE

SOURCE: Omni-Means

FIGURE VIA-3

TOTAL PROJECT PM PEAK HOUR TRIPS FRIDAY & SUNDAY

INTERFACE

2.3.3 Hostel Trip Distribution

The low volume hostel trips (9 peak hour trips) were distributed using the "shortest-path" rules to the primary links of U.S. 101, State Street and Cabrillo Boulevard. Using this methodology, the hostel trips were distributed as follows: 33-percent U.S. Highway 101 south, 22-percent U.S. Highway 101 north, 22-percent State Street and 22-percent Cabrillo Boulevard (Waterfront Area).

2.3.4 Project Trip Distribution Conclusion

Development of the proposed park, hotel and hostel would generate a total of 135 PM peak hour trips on the weekdays and a total of 224 PM peak hour trips on the weekends. **When the trips to be generated by the proposed project were applied to the existing street network described above, significant effects to the operation of the study area intersections did not result. That is, the project did not cause any additional intersections to exceed V/C ratio 0.77 nor did it cause a 1% or greater increase in V/C ratio to any already impacted intersection. Therefore, development of the Waterfront Park, Hotel and Youth Hostel would not result in project-specific significant adverse traffic or circulation impacts on the existing street network.**

2.4 Project Access and Parking Impacts

2.4.1 Project Access

The primary hotel access would be via a driveway on Salsipuedes Street (see Figure VIA-3). The driveway would access the hotel's underground parking area. Salsipuedes Street is currently a short street that dead-ends at the railroad tracks. According to the site plan, the access driveway would be located on Salsipuedes Street approximately 160-feet north of Cabrillo Boulevard. The existing median on Salsipuedes Street extends from Cabrillo Boulevard to the proposed driveway's location. Although left-turns into the site could be made with the current configuration, vehicles turning left into the site could delay through traffic continuing on to the Red Lion driveway.

The primary park access would be at a driveway on Santa Barbara Street, about 220 feet north of Cabrillo Boulevard. The 36 spaces accessible from this driveway would generate about 8 vehicle trips during a Friday PM peak hour and 31 vehicle trips during a Sunday afternoon peak hour. These volumes would not be expected to measurably affect the through traffic flows on Santa Barbara Street. The park would also have a small 6 space lot accessible onto Cabrillo Boulevard about 950 feet from both Salsipuedes Street and Santa Barbara Street. These 6 spaces would only generate 1-2 vehicle trips during a Friday PM peak hour and 5 trips during a Sunday afternoon hour. Although this trip generation is minimal, the through traffic on Cabrillo Boulevard is heavy (about 1,700 Friday peak hour vehicles and 2,100 Sunday peak hour vehicles) and inbound/outbound left-turns from this driveway could be disruptive to the through traffic flows.

Consideration has also been given to pedestrian crossings of Cabrillo Boulevard. The project includes a proposed crossing of Cabrillo (mid-way between Salsipuedes and Santa Barbara Streets). The park's trip generation calculations indicate that the park would attract 104 Sunday peak hour users who are already in the Waterfront Area. The pedestrian crossing was included in this project description based on information from previous EIRs prepared for the site which indicated that safety impacts may occur if a designated crossing was not included. Therefore, provision of this crossing is necessary to mitigate potential safety impacts. Although it would be tenuous to predict the crossing activity in this crosswalk, any new uncontrolled crosswalk would result in some conflicts with through traffic on Cabrillo Boulevard.

However, in that uncontrolled crosswalks are more dangerous than controlled or signalized crosswalks, construction of an uncontrolled crosswalk could result in adverse safety impacts. However, it is anticipated that the crosswalk volume generated by the park would not warrant a pedestrian activated traffic signal at this location. Therefore, if a crosswalk is included at all, it shall be signalized.

Finally, the site plan does allow for emergency vehicle access between Salsipuedes Street and Santa Barbara Street along the proposed pathways located in the northern portion of the park. It is also noted that if Southern Pacific removes the adjacent spur track at some point in the future, full access through the site could be considered.

2.4.2 Project Parking

The discussion of project parking has focused on the individual parking needs of the public park, hotel and hostel. The parking needs of the hotel and hostel have been based on detailed preliminary studies of those developments. For the public park, parking needs have been established from the park's trip generation characteristics. Because weekend parking demand is higher than weekday demand, the analyses have focused on weekend conditions.

The public park's peak hour weekend demand has been calculated to be 74 parking spaces.[16] In addition, 9 existing spaces along the Carpinteria Street frontage would be eliminated as part of the park project. **The park portion of the site would include a total of 62 spaces, which would not meet the needs of the park portion of the site demand and the displaced vehicles from Carpinteria Street.** The City has identified a need for additional parking in the Waterfront Area. Some ideas currently under consideration are development of a parking structure at the corner of Santa Barbara Street and Cabrillo Boulevard, formation of an assessment district to fund construction of new parking supplies or Redevelopment Agency financing the new parking itself. The City Planning Division and Redevelopment Agency have been and would continue to work on development of additional parking in the Waterfront Area. **Because no specific parking increases are programmed at this time, construction of the proposed park portion of the site would create a short-term significant, adverse, unavoidable impact on parking supply. However, the Santa Barbara Street parking lot would be redesigned due to the Garden Street extension and would result in at least 21 additional off-street public parking spaces which would mitigate this parking impact in the long-term. Therefore, the park would create a short-term, significant parking impact.** The effects are discussed in the section detailing the Garden Street extension.

The hotel project parking needs would vary, dependent upon the possible combination of hotel activities. Virtually all luxury hotels include dining rooms, bar/lounge areas and some banquet/meeting room space. The proposed project would have these features and it would be reasonable to expect that overall parking demand rates established for this type of hotel would apply to the proposed project. In fact, surveys conducted at the adjacent Red Lion hotel indicate a peak weekend rate of 1.28 spaces per room which equates to a 192 peak space demand for this project. Using this calculation, the project's proposed 245 valet parking spaces should be ample for the hotel portion of the site's demand.

To provide a conservative assessment of parking needs, consideration has been given to the potential for special events creating parking demand unrelated to the basic hotel operation. The two most likely scenarios would involve a local meeting or a wedding reception where none of the meeting or reception

[16] 96 peak hour vehicle trips / 2 one-way trips per vehicle x 1.5 (factor to allow for some overlap of arriving and departing vehicles) = 72 parking spaces. Two park staff = 2 parking spaces.

participants are hotel guests. **According to detailed calculations, these scenarios could result in peak parking deficits of 57-97 spaces.**[17]

While it is unlikely that such deficits would occur with great frequency, the project could include measures to meet the occasional needs of such scenarios. Specifically, the adjacent Red Lion Resort has a 930 space parking lot which usually (99-percent of all days during a two year 1989-1991 survey) experiences a peak demand of no more than 700 spaces. During this two-year survey period, there were 73 special events, each attracting over 500 participants. These statistics suggest that, even with special events at the Red Lion Resort, that hotel would almost always have a 230 space surplus (930 spaces less a 700 space demand) which could serve the overflow demand from the proposed project. However, on four days during the two-year survey, parking demand at the Red Lion Resort was such that there would not have been adequate surplus parking to accommodate the project's deficit from a 300 person wedding reception.

Alternatively, additional (structure) parking could be constructed within the Red Lion Resort property and dedicated for use by this project. With either of these alternatives, there would be access and internal circulation issues relative to the use of the Red Lion parking lot. Any overflow vehicles would need to be clearly and efficiently directed to the Red Lion driveway. Within the Red Lion parking lot, it would be appropriate for this surplus parking area to be segregated from other Red Lion parking areas. To avoid further confusion, it may be desirable to have parking attendants direct traffic within the Red Lion lot. If overflow parking cannot be provided in the Red Lion lot, an unused railroad parcel (north of the railroad tracks) could be developed with a 138 space parking lot. While this alternative could provide adequate surplus parking for occasional special events, its development would be dependent upon property acquisition and the extension of Salsipuedes Street across the railroad tracks.

The youth hostel would have a peak demand for 21 parking spaces, summarized as follows:

75 beds @ 1 space/5 beds	= 15 spaces
6 employees @ 1 space / employee	= 6 spaces
Total	**= 21 spaces**

The site plan indicates 27 spaces would be provided, accommodating the calculated demand.

2.5 Cumulative Impacts

The impacts of the proposed project were examined within the context of projected future base traffic

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[17] Hotel Occupancy Plus 220 Person Meeting

150 rooms @ 1.28 spaces per room	= 192 spaces
220 person meeting / 2 people per vehicle	= 110 spaces
Total	**= 302 spaces**
Proposed hotel parking	= 245 spaces
Potential Deficit	= 57 spaces

Full Hotel Occupancy Plus 300 Person Wedding Reception

150 rooms @ 1.28 spaces per room	= 192 spaces
300 person reception / 2 people per vehicle	= 150 spaces
Total	**= 342 spaces**
Proposed hotel parking	= 245 spaces
Potential Deficit	= 97 spaces

conditions in the vicinity of the project. To determine the future background base conditions, cumulative projects that would affect traffic flows in the project study area were identified by City of Santa Barbara staff. From these developments, the associated project trips were generated and distributed onto the street network, then added to the existing volumes at the studied intersections. The cumulative projects used for the future base condition represent all of the approved or planned developments within the Downtown and Waterfront Areas. (The cumulative projects are listed in Appendix C.)

Standard published trip rates[18] were used to generate vehicle trips at all of the locations, except the post office and conference facility. The post office is proposed to replace an existing facility located on Milpas Street. Though larger than the existing facility, post office vehicle trip rates are mostly a function of the size of the serving area, which would not change. The vehicle trips for the existing post office were redistributed to the proposed location of Cacique Street south of the freeway and it was assumed that the existing post office would be occupied by office uses.[19] The conference facility trip rate was determined based on the average size of similar uses at the Red Lion Resort as provided by City staff. Published Caltrans data was used to calculate an hourly trip rate based on the number of persons on-site during the peak hours.[20]

The City of Santa Barbara indicates that planned improvements designated for the Castillo/Montecito intersection will be implemented within the time frame for the cumulative impact analysis. The improvements to this intersection will provide one left-turn lane, one through lane and one right-turn lane for the southbound (toward Waterfront) Castillo approach and the westbound (toward City College) Montecito approach; one left-turn lane, one through lane, and one through/right-turn lane for the northbound Castillo approach; and two left-turn lanes and one through/right-turn lane for the eastbound Montecito approach.

The cumulative traffic projections for the study intersections during both peak hours, not including the traffic generated by the proposed project, are shown in Figures VIA-4 and VIA-5.

2.5.1 Cumulative Impacts on Street Network Without Project

As shown in Table VIA-5, the overall level-of-service would not degrade from existing conditions at 14 of the studied intersections during the Friday p.m. peak hour. The LOS would degrade slightly at the Garden/101 Ramp intersections. The v/c ratios would increase at the signalized intersections due to the increased volumes, but all but one would continue to operate efficiently and within the City's accepted traffic flow levels of LOS "C" and a V/C ratio of 0.77. The intersections currently experiencing congestion problems would experience a one-percent increase in congestion levels. **The Milpas/U.S. 101 Southbound On-ramp intersection would continue to operate at LOS "C", but the v/c ratio would increase from 0.77 to 0.80, resulting in operating conditions above the City's threshold of LOS 0.77. The Milpas/101 Northbound Ramps-Carpinteria intersection would experience congestion, operating at LOS "D", but would experience only a slight increase in V/C ratio to 0.87. The stop-controlled Cabrillo/101 Ramps intersection would continue to operate poorly at LOS "F".**

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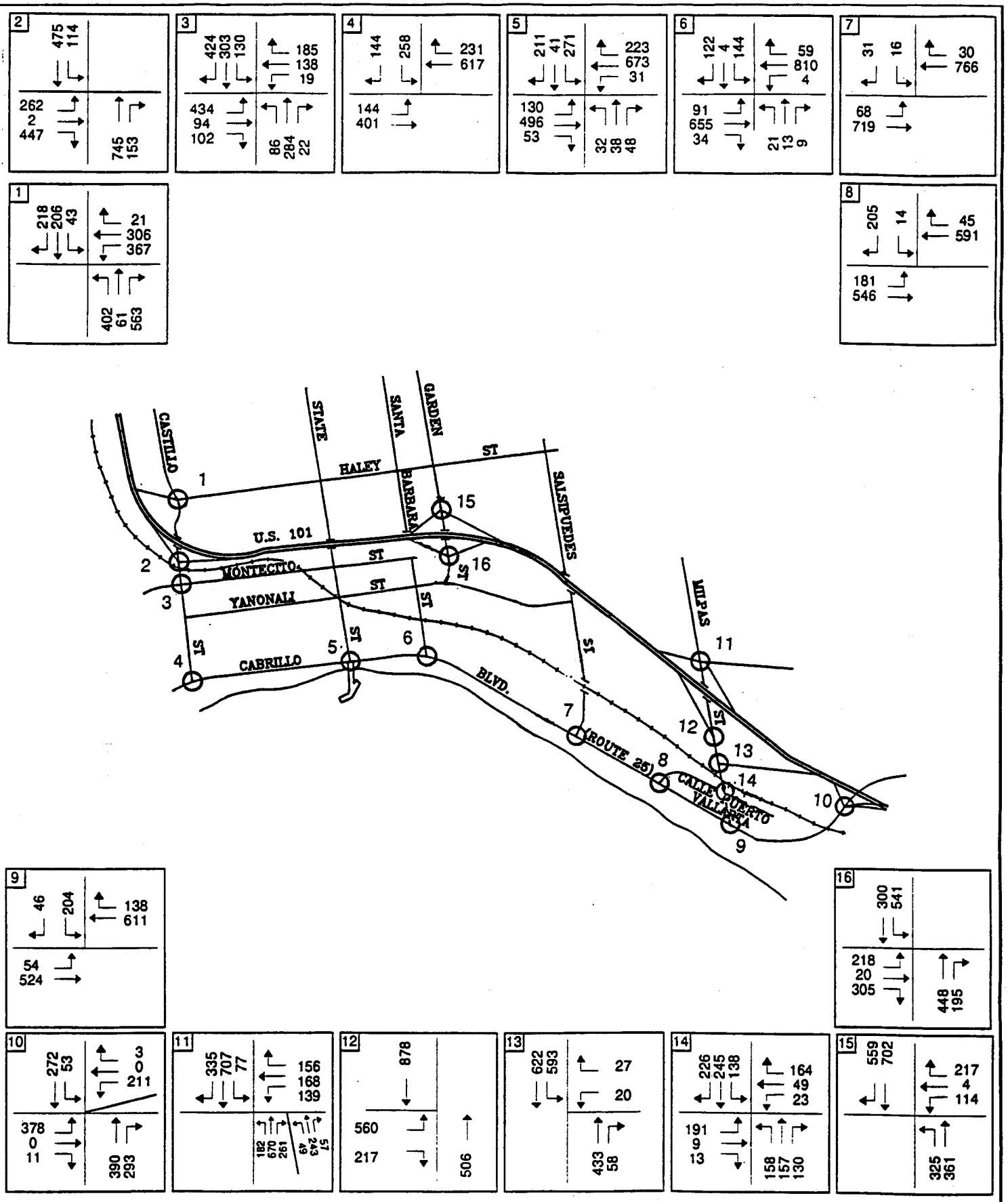
18 Institute of Transportation Engineers, Trip Generation, Fifth Edition, 1991.

19 Mike Stone, U.S. Postal Service District Office, Telephone Communication, November 24, 1992.

20 Caltrans, 14th Progress Report on Trip Ends Generation, 1982.



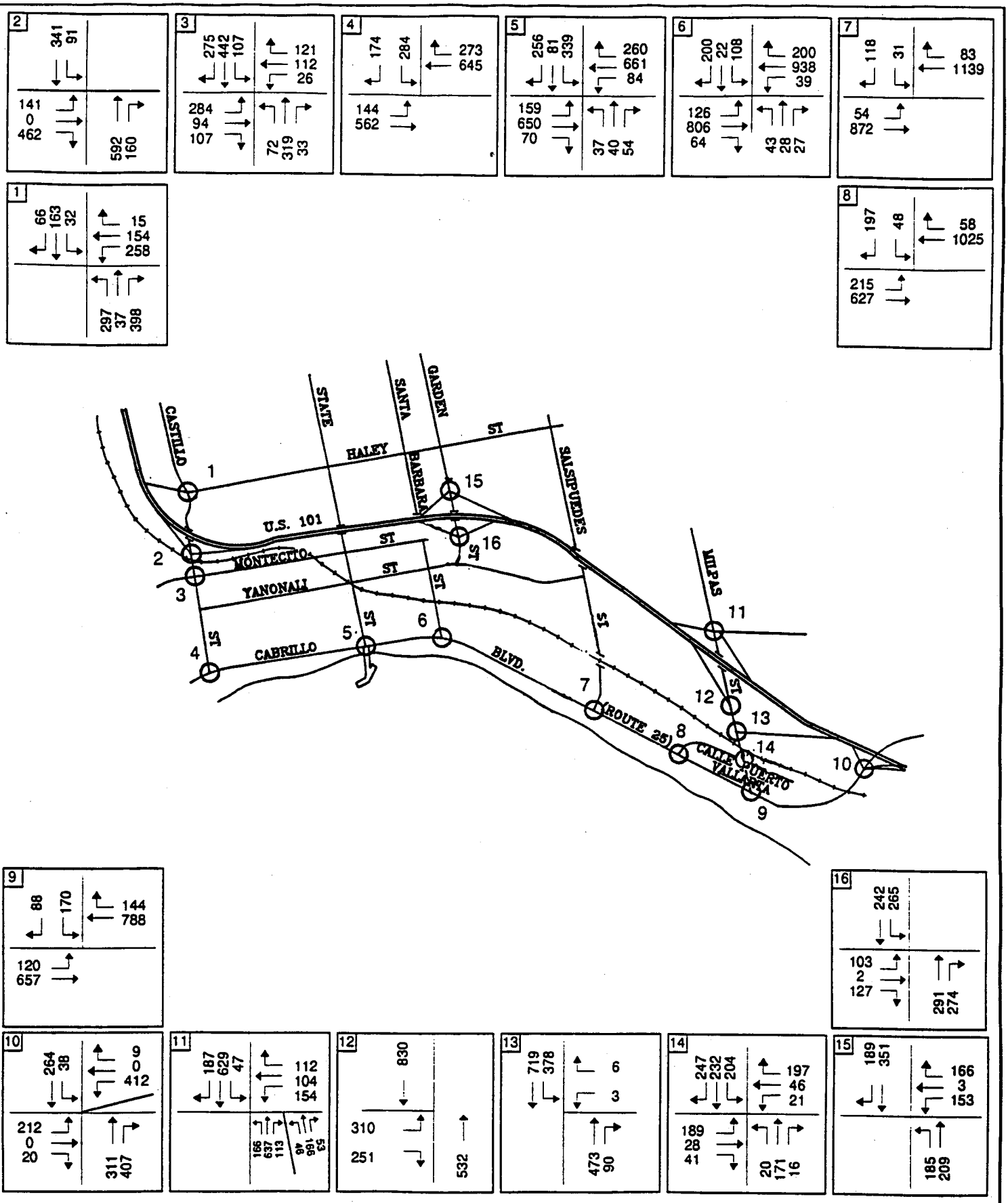
NOT TO SCALE

SOURCE: Omni-Means

FIGURE VIA-4

EXISTING + CUMULATIVE FRIDAY PM PEAK HOUR VOLUMES

INTERFACE



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SOURCE: Omni-Means

FIGURE VIA-5

EXISTING + CUMULATIVE SUNDAY PM PEAK HOUR VOLUMES

INTERFACE

TABLE VIA-5
PEAK HOUR INTERSECTION OPERATING CONDITIONS
CUMULATIVE WITHOUT PROJECT VOLUMES

Intersection	Control Device	Existing Friday Peak LOS V/C	Existing Sunday Peak LOS V/C	Cumulative Friday Peak LOS V/C	Cumulative Sunday Peak LOS V/C
1. Castillo/101 NB-Haley	S	B 0.64	A 0.40	B 0.68	A 0.42
2. Castillo/101 SB	S	A 0.56	A 0.51	A 0.58	A 0.53
3. Castillo/Montecito*	S	**C 0.78**	C 0.77	B 0.61	B 0.68
4. Castillo/Cabrillo	S	A 0.55	B 0.60	A 0.58	B 0.62
5. Cabrillo/State	S	B 0.61	C 0.71	B 0.63	C 0.73
6. Cabrillo/Santa Barbara	S	A 0.42	B 0.62	A 0.46	B 0.67
7. Cabrillo/Salsipuedes	S	A 0.31	A 0.50	A 0.34	A 0.52
8. Cabrillo/Puerto Vallarta	S	A 0.43	B 0.64	A 0.45	B 0.65
9. Cabrillo/Milpas	S	A 0.43	A 0.53	A 0.44	A 0.53
10. Cabrillo/101	U	**F N.A.**	**F N.A.**	**F N.A.**	**F N.A.**
11. Milpas/101 NB-Carp.	S	**D 0.85**	B 0.69	**D 0.86**	C 0.71
12. Milpas/101 SB Offramp	S	A 0.48	A 0.38	A 0.50	A 0.39
13. Milpas/101 SB On-I.M.	S	C 0.77	B 0.63	**C 0.80**	B 0.67
14. Milpas/Puerto Vallarta	S	A 0.54	A 0.52	A 0.55	A 0.55
15. Garden/101 NB	S	A 0.58.	A 0.31	B 0.63	A 0.37
16. Garden/101 SB	S	B 0.68	A 0.40	C 0.73	A 0.44

*Castillo/Montecito cumulative conditions reflect planned intersection improvements.
Bold type text identifies intersections significantly impacted.
Control Device: S = Signalized, U = Unsignalized, N.A. = Not Applicable; unsignalized intersection does not yield v/c ratio.

During the Sunday afternoon peak hour, only the Milpas/101 northbound ramp intersection would degrade (from LOS "B" to LOS "C"). All of the signalized intersections would operate within the City's accepted traffic standard. The unsignalized Cabrillo/101 Ramps intersection would continue to operate at LOS "F".

Peak hour signal warrant analyses were conducted for the unsignalized Cabrillo/101 Ramps intersection. Similar to existing conditions, the traffic volumes under cumulative conditions would be above the minimum level at which signal controls are warranted during the Friday and Sunday p.m. peak hours.

Under this scenario, the cumulative impacts at Milpas/Highway 101 S.B. On-ramp, Milpas/Highway 101 NB Ramps-Carpinteria, and Cabrillo/Highway 101 Ramps would be considered significant.

2.5.2 Cumulative With Project Conditions

The proposed project generated trips were added to the cumulative base traffic volumes and the operating conditions were recalculated, resulting in the level of service conditions as shown in Table VIA-6. Friday and Sunday p.m. peak traffic volumes are illustrated in Figures VIA-6 and VIA-7.

As indicated in Table VIA-6, with the addition of the project traffic, the Milpas/101 northbound ramps and Milpas/101 southbound on-ramp, the intersections would continue to operate below the City threshold (which is LOS "C", v/c = 0.78). At each location the project (in comparison to cumulative baseline conditions) would add only 0.01 to the v/c ratios. At the Cabrillo/101 Ramps intersection, conditions would remain LOS "F". The project would add about one-percent to the intersection volume and would not significantly impact the already poor operating conditions.

During the Sunday afternoon peak hour, the LOS would degrade only at Cabrillo/Santa Barbara, but the operation (LOS "C", v/c = 0.71) would remain well within the City standard. The Cabrillo/101 interchange intersection would continue to operate at LOS "F", but project trips would add only one-percent to the cumulative baseline volumes.

Under this scenario, the cumulative impacts at Milpas/Highway 101 SB on-ramp, Milpas/Highway 101 NB ramps-Carpinteria Street, and Cabrillo/Highway 101 ramps would be considered significant.

2.5.3 Cumulative With Project With Only The Salsipuedes Street Extension

The cumulative traffic conditions have been projected assuming proposed changes in the street network in the Waterfront Area. Two circulation improvements are proposed for the area, including extending Garden Street from the Garden Street/Yanonali Street intersection directly to Cabrillo Boulevard, and connecting Salsipuedes Street across the railroad tracks to create a through road from Cabrillo Boulevard into the Eastside and industrial areas. A large portion of the current vehicle traffic between the Downtown and Waterfront Areas in the eastern portion of the City travels via Milpas Street. The freeway ramps at Milpas Street also serve the majority of traffic between the Waterfront Area and Highway 101 from the south. The proposed extensions would also reroute a portion of the trips generated by cumulative growth and the proposed project.

TABLE VIA-6
PEAK HOUR INTERSECTION OPERATING CONDITIONS
CUMULATIVE WITH PROJECT VOLUMES

		Cumulative		Cumulative + Project	
	Control	Friday Peak	Sunday Peak	Friday Peak	Sunday Peak
Intersection	Device	LOS V/C	LOS V/C	LOS V/C	LOS V/C
1. Castillo/101 NB-Haley	S	B 0.68	A 0.42	B 0.68	A 0.42
2. Castillo/101 SB	S	A 0.58	A 0.53	A 0.59	A 0.53
3. Castillo/Montecito*	S	B 0.61	B 0.68	B 0.61	B 0.68
4. Castillo/Cabrillo	S	A 0.58	B 0.62	A 0.58	B 0.63
5. Cabrillo/State	S	B 0.63	C 0.73	B 0.63	C 0.74
6. Cabrillo/Santa Barbara	S	A 0.46	B 0.67	A 0.50	C 0.71
7. Cabrillo/Salsipuedes	S	A 0.34	A 0.52	A 0.39	A 0.58
8. Cabrillo/Puerto Vallarta	S	A 0.45	B 0.65	A 0.46	B 0.67
9. Cabrillo/Milpas	S	A 0.44	A 0.53	A 0.45	A 0.54
10. Cabrillo/101	**U**	**F N.A.**	**F N.A.**	**F N.A.**	**F N.A.**
11. Milpas/101 NB-Carp.	**S**	**D 0.86**	C 0.71	**D 0.87**	C 0.71
12. Milpas/101 SB Offramp	S	A 0.50	A 0.39	A 0.50	A 0.40
13. Milpas/101 SB On-I.M.	S	**C 0.79**	B 0.67	**C 0.80**	B 0.68
14. Milpas/Puerto Vallarta	S	A 0.55	A 0.55	A 0.56	A 0.56
15. Garden/101 NB	S	B 0.63	A 0.37	B 0.64	A 0.39
16. Garden/101 SB	S	C 0.73	A 0.44	C 0.74	A 0.46

*Castillo/Montecito cumulative conditions reflect planned intersection improvements.
Bold type text identifies intersections significantly impacted.
Control Device: S = Signalized, U = Unsignalized, N.A. = Not Applicable; unsignalized intersection does not yield v/c ratio.

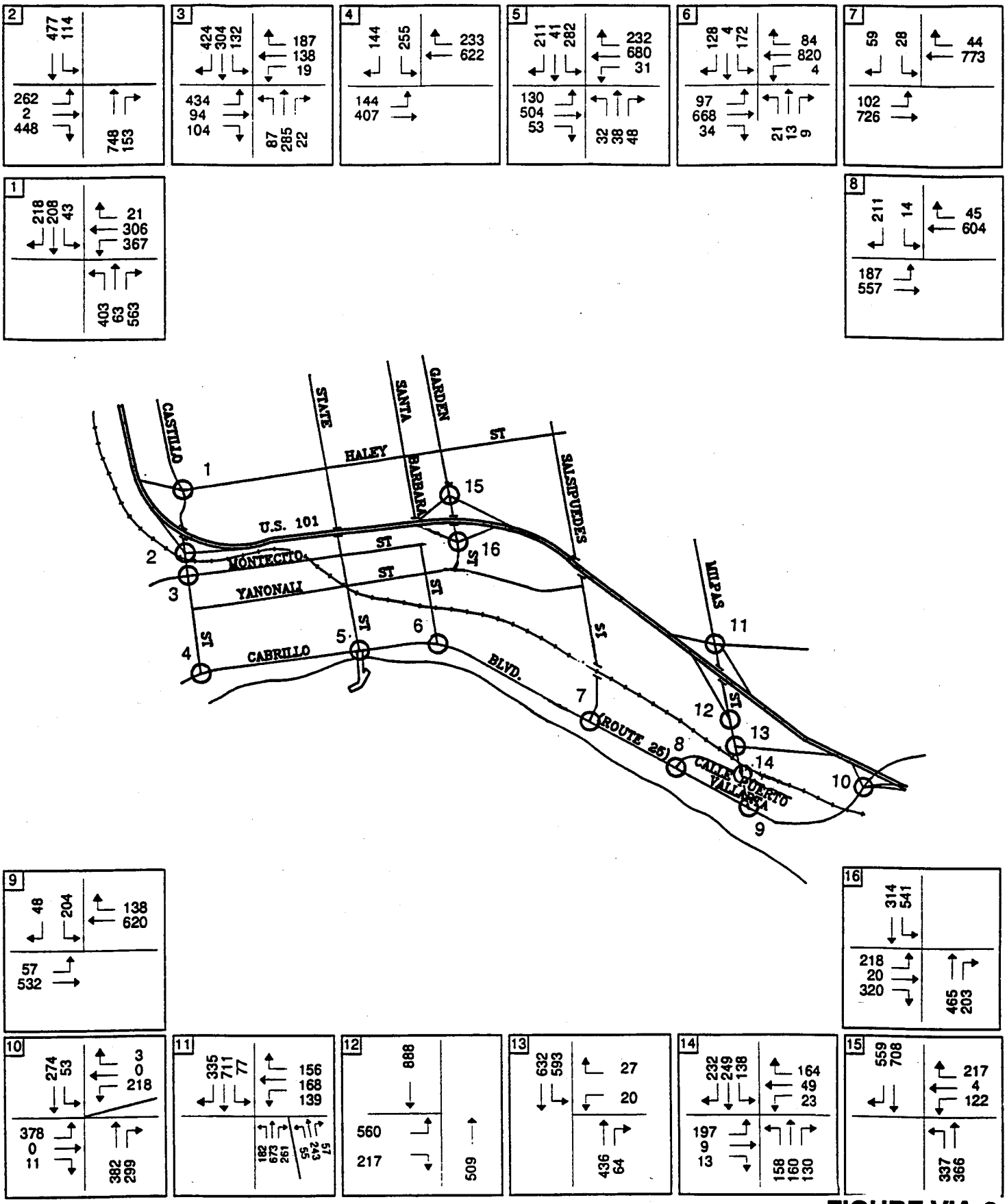


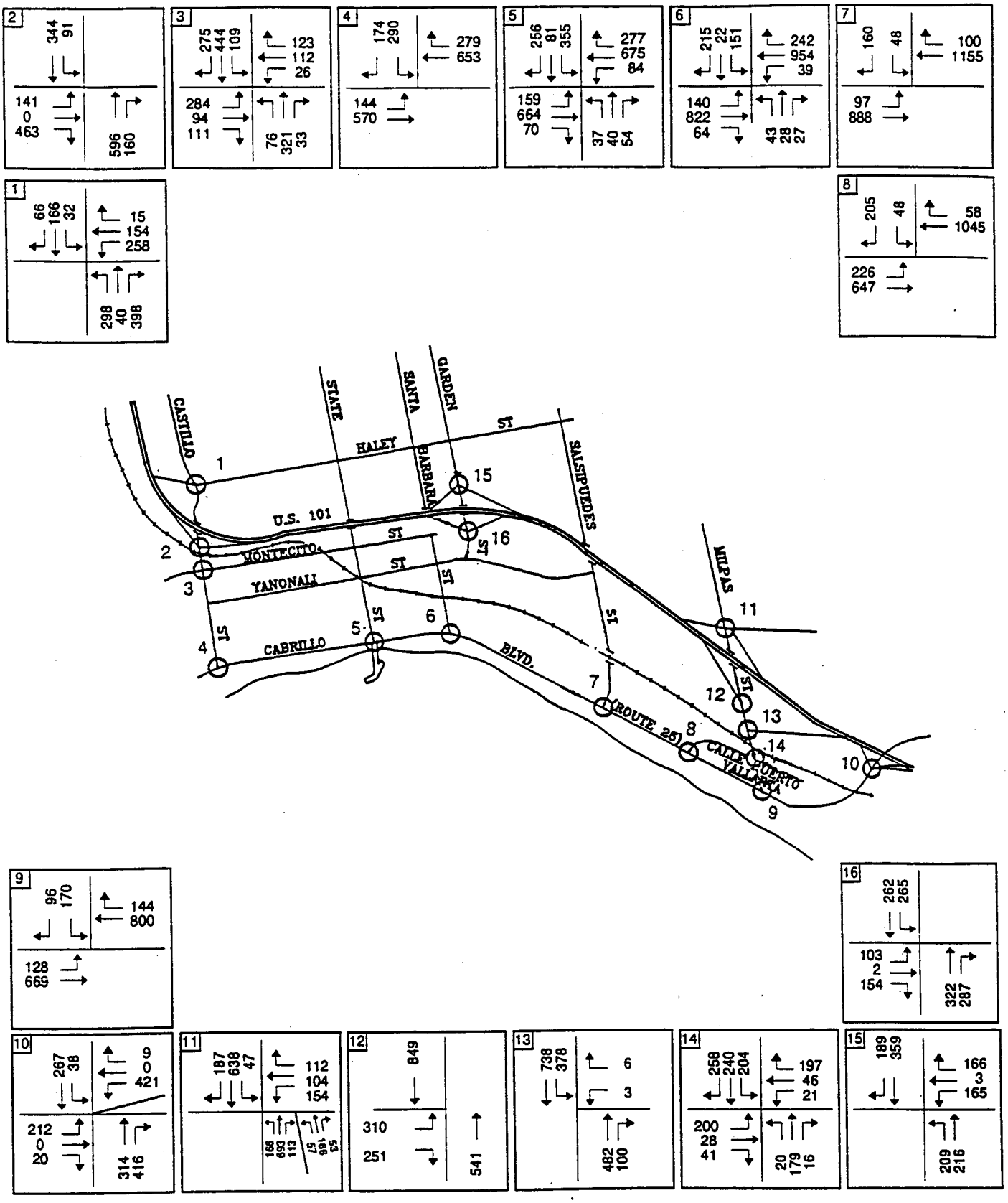
FIGURE VIA-6

EXISTING + CUMULATIVE + PROJECT FRIDAY PM PEAK HOUR VOLUMES

NOT TO SCALE

SOURCE: Omni-Means

INTERFACE



NOT TO SCALE

SOURCE: Omni-Means

FIGURE VIA-7

EXISTING + CUMULATIVE + PROJECT SUNDAY PM PEAK HOUR VOLUMES

INTERFACE

Cumulative traffic conditions for this scenario were projected assuming only Salsipuedes Street is extended and Garden Street is unaltered. With only the Salsipuedes Street extension, volumes generated by the City traffic model indicate approximately 200 peak hour through trips would be diverted from Milpas Street. Without the Garden Street improvements, there would be no measurable diversion of trips from the Highway 101 ramps at Milpas Street to the Garden Street interchange. The traffic volumes were distributed onto the street network assuming only the Salsipuedes Street extension and the intersection operating conditions were calculated. The Friday and Sunday peak hour traffic volumes are illustrated in Figures VIA-8 and VIA-9.

As shown in Table VIA-7, the Milpas Street intersections would experience somewhat less efficient operating conditions with only the Salsipuedes Street extension than with the Garden Street extension, (discussed below) but the intersections would be improved over cumulative conditions without any street improvements. Compared to conditions with both extensions, only the intersections of Milpas/101 NB-Carpinteria and Milpas/101 SB On-ramp-Indio Muerto during the weekday peak hour would decline in level of service. One intersection, Milpas/101 NB-Carpinteria (LOS "D", V/C 0.83), would experience conditions above the City's LOS operating standard. However, the intersection would improve in comparison to existing conditions.

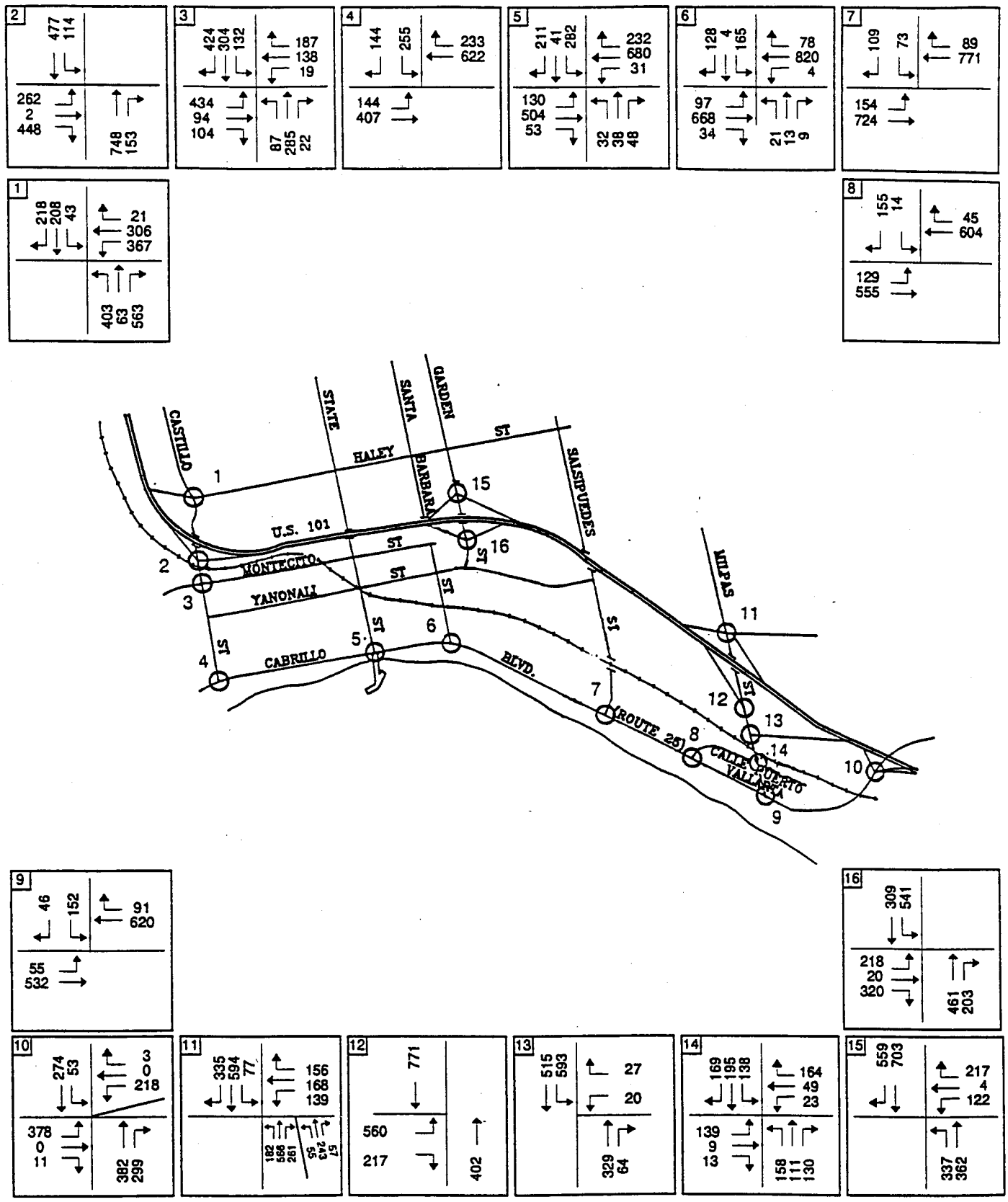
Without any trips diverted to the Garden Street intersections, the Garden Street/101 Ramps intersections would operate at LOS "B" or better and the Garden Street/Cabrillo Boulevard intersection would operate at LOS "C" or better during the peak hour.

As discussed below for the combined Salsipuedes and Garden Street extensions, it is tenuous to determine the relative responsibility for the Salsipuedes Street extension only scenario. However, Table VIA-7 outlines the relative increase in congestion. Again, existing congestion problems would benefit from this street extension. The City's zoning ordinance indicates that occupancy of the proposed project would be contingent upon completion of this improvement measure.

Even with the addition of the Salsipuedes Street extension, the intersection of Cabrillo/Highway 101 offramps would continue to operate at LOS "F", thereby resulting in a significant, cumulative impact at this intersection.

2.5.4 Cumulative With Project Plus Proposed Salsipuedes and Garden Street Extensions

Using traffic projections for the study area generated by a City of Santa Barbara traffic model, the proposed Garden Street and Salsipuedes Street extensions were projected to divert approximately 300 peak hour vehicle trips from the current Milpas Street volumes. Approximately 200 Milpas Street through trips would be diverted to Salsipuedes Street and approximately 100 Highway 101/Milpas Street Ramps trips would be diverted to the Garden Street interchange. The proposed extensions would also reroute a portion of the trips generated by cumulative growth and the proposed project. The diverted trips were redistributed onto the street network with the street extensions and the intersection operating conditions recalculated. Friday and Sunday peak hour traffic volumes with the Salsipuedes Street and Garden Street extensions are illustrated in Figures VIA-10 and VIA-11. Friday and Sunday peak hour volumes with the Salsipuedes and Garden Street extensions, including the change in volumes with the extensions (in parentheses) are illustrated in Section XIII, Response to Comments, Figures XIII-1 and XIII-2.



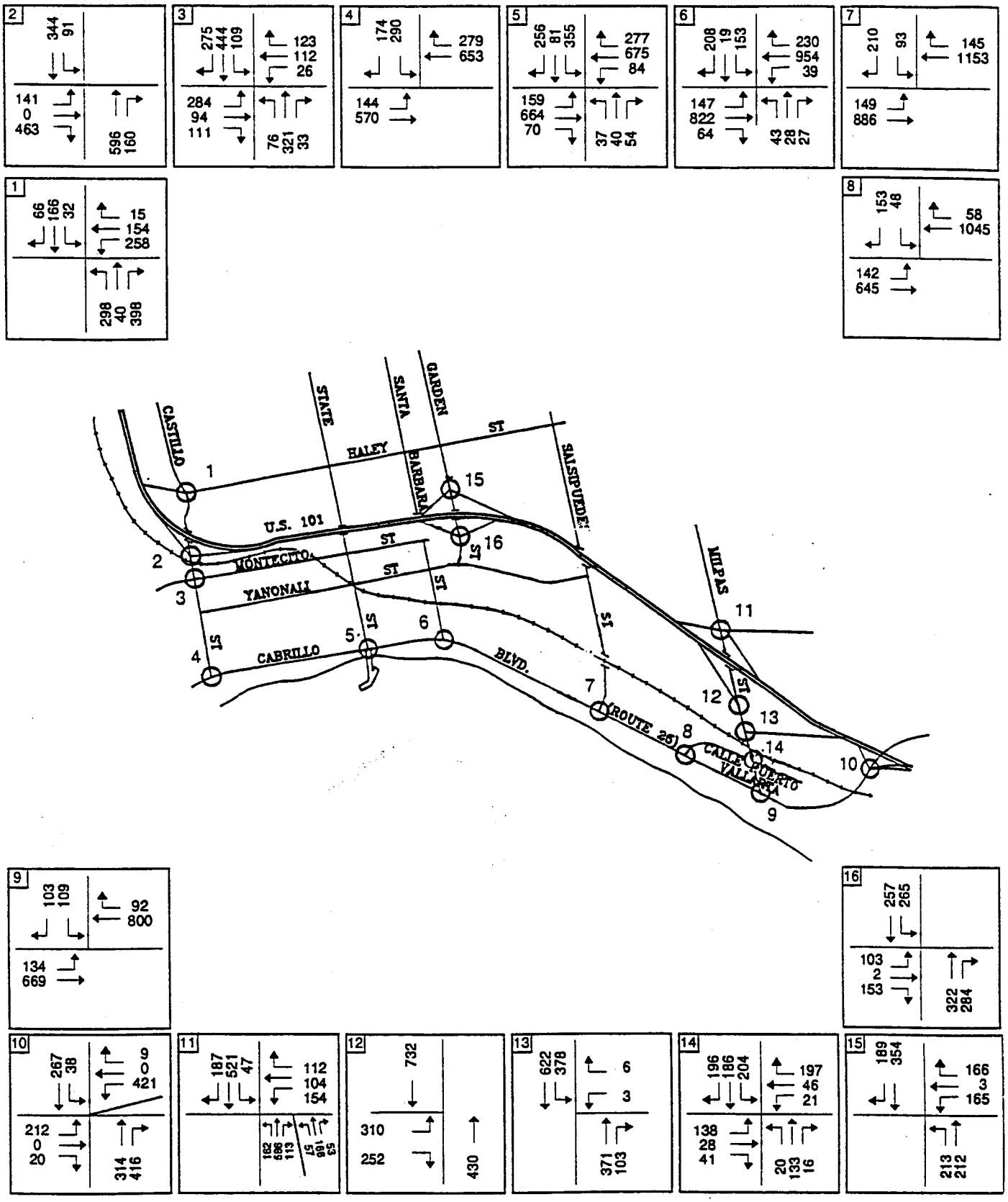
NOT TO SCALE

SOURCE: Omni-Means

FIGURE VIA-8

EXISTING + CUM. + PROJECT WITH SALSIPUEDES STREET EXTENSION FRIDAY PM PEAK HOUR VOLUMES

INTERFACE



NOT TO SCALE

SOURCE: Omni-Means

FIGURE VIA-9

EXISTING + CUM. + PROJECT WITH SALSIPUEDES STREET EXTENSION SUNDAY PM PEAK HOUR VOLUMES

INTERFACE

TABLE VIA-7
PEAK HOUR INTERSECTION OPERATING CONDITIONS
CUMULATIVE WITH PROJECT PLUS SALSIPUEDES STREET EXTENSION

		Cumulative + Project		Cml.+Prj. W/Extension	
Intersection	Control Device	Friday Peak LOS V/C	Sunday Peak LOS V/C	Friday Peak LOS V/C	Sunday Peak LOS V/C
1. Castillo/101 NB-Haley	S	B 0.68	A 0.42	B 0.68	A 0.42
2. Castillo/101 SB	S	A 0.59	A 0.53	A 0.59	A 0.53
3. Castillo/Montecito*	S	B 0.61	B 0.68	B 0.61	B 0.68
4. Castillo/Cabrillo	S	A 0.58	B 0.63	A 0.58	B 0.63
5. Cabrillo/State	S	B 0.63	C 0.74	B 0.63	C 0.74
6. Cabrillo/Santa Barbara	S	A 0.50	C 0.71	A 0.49	C 0.71
7. Cabrillo/Salsipuedes	S	A 0.39	A 0.58	A 0.46	B 0.66
8. Cabrillo/Puerto Vallarta	S	A 0.46	B 0.67	A 0.40	A 0.60
9. Cabrillo/Milpas	S	A 0.45	A 0.54	A 0.40	A 0.48
10. Cabrillo/101	**U**	**F N.A.**	**F N.A.**	**F N.A.**	**F N.A.**
11. Milpas/101 NB-Carp.	**S**	**D 0.87**	C 0.71	D 0.83	B 0.67
12. Milpas/101 SB Offramp	S	A 0.50	A 0.40	A 0.46	A 0.36
13. Milpas/101 SB On-I.M.	S	**C 0.80**	B 0.68	C 0.72	B 0.60
14. Milpas/Puerto Vallarta	S	A 0.56	A 0.56	A 0.49	A 0.49
15. Garden/101 NB	S	B 0.64	A 0.39	B 0.64	A 0.39
16. Garden/101 SB	S	C 0.74	A 0.46	C 0.74	A 0.46

* Castillo/Montecito cumulative conditions reflect planned intersection improvements.
Control Device: S = Signalized, U = Unsignalized
N.A. = Not Applicable; unsignalized intersection does not yield v/c ratio.

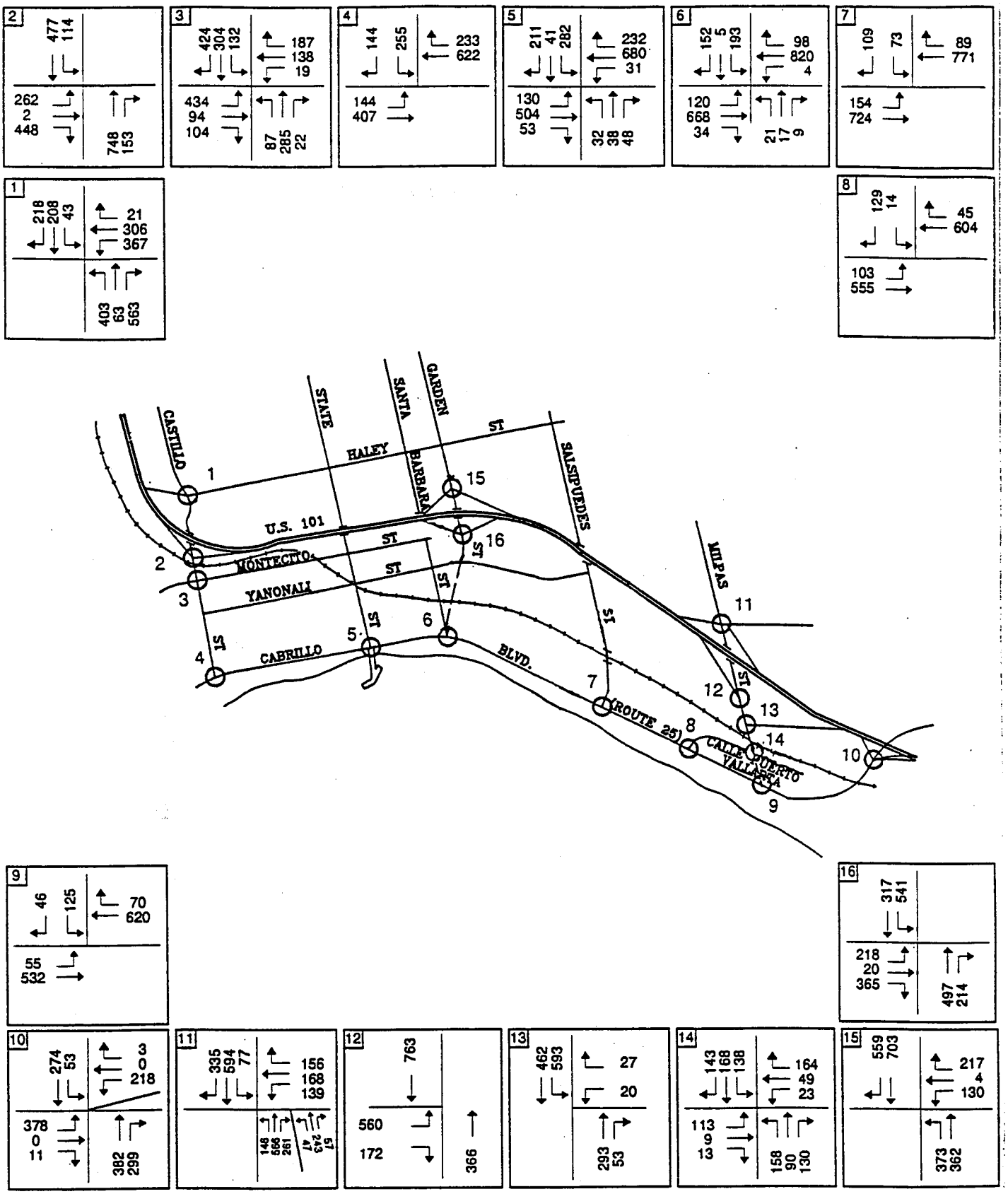
In addition to providing more direct access for local trips within the Waterfront Area, the two proposed extensions would primarily benefit Milpas Street operating conditions at intersections between the freeway and Cabrillo Boulevard (as shown in Tables VIA-8 and Table VIA-9). Table VIA-10 provides a summary of intersection operation with the two improvements. All of the Milpas Street intersections analyzed would experience improved operating conditions compared to cumulative-plus-project conditions without the street extensions. Milpas/Cabrillo, Milpas/Calle Puerto Vallarta, Milpas/Highway 101 SB Off-ramp and Cabrillo/Calle Puerto Vallarta would continue to operate at LOS "A" during the weekday and weekend peak hours. Milpas/Highway 101 SB On-ramp would improve from LOS "C" to LOS "B" or better, indicating improved intersection performance. The Milpas/Highway 101 NB Ramps-Carpinteria intersection, with the highest level of congestion occurring during the weekday, would improve from LOS "D" (v/c ratio = 0.87) to LOS "C" (v/c ratio = 0.83). Although noticeably improved from its existing condition, this intersection would continue to operate over the City's standard of LOS "C" and v/c ratio of 0.77.

As a through street, Salsipuedes Street would experience a large increase in traffic volumes (in comparison to the low traffic level without the extension), but the Cabrillo/Salsipuedes intersection would continue to operate very efficiently at LOS "B" or better during the peak hours.

The Salsipuedes Street extension would intersect the existing railroad track immediately north of the project site, creating a new railroad track crossing. Information on train schedules and frequencies was analyzed in order to assess the potential for vehicle queues during train passings. Currently, passenger train service is provided by Amtrak's Coast Starlight and San Diegan trains. The Coast Starlight train passes the project site area twice daily at approximately 12:30 p.m. northbound and 4:35 p.m. southbound. The San Diegan train passes through four times daily, at approximately 7:45 a.m. and 3:15 p.m. southbound, and at noon and 10:30 p.m. northbound. Freight train service is unscheduled, but averages six train passings daily, with approximately three occurring during the daylight hours and three at night.

Given the train schedules, only one train passing (the 4:35 p.m. Coast Starlight) occurs during the peak hour of vehicle traffic. Surveys indicate an average crossing time of approximately two minutes for the passenger train. Peak hour volumes on Salsipuedes Street are expected to be 100 vehicles in each direction crossing the tracks. With a two minute closure of Salsipuedes, 3-4 vehicles (on average) would be stopped during each train passing. To conservatively allow for potential peak flows, a factor of 150% yields 5 vehicles stopped during each train passing. With two lanes in each direction, the maximum queue would be 60-70 feet. Salsipuedes Street extends approximately 400-feet to Cabrillo Boulevard and the train crossings would not significantly impact the storage length capacity.

The traffic levels on Garden Street due to its extension would also increase, but the traffic increases would be somewhat limited since Santa Barbara Street already provides an indirect connection between the Garden Street interchange and Cabrillo Boulevard. Most of the traffic increase would result from the freeway trips diverted from the Milpas Street/Highway 101 Ramps. The Cabrillo/Garden intersection operating conditions would decline from LOS "C" (v/c ratio = 0.70) to LOS "C" (v/c ratio = 0.75) during the weekend peak hour, but the intersection would continue to operate within standard levels. The Garden/Highway 101 NB Ramps operating conditions would decline, but continue to operate at LOS "B" or better. The Garden/Highway 101 SB Ramps would continue to operate at LOS "C", with v/c ratio changing from 0.74 to 0.77 during the Friday peak hour, but would still operate within the standard levels.



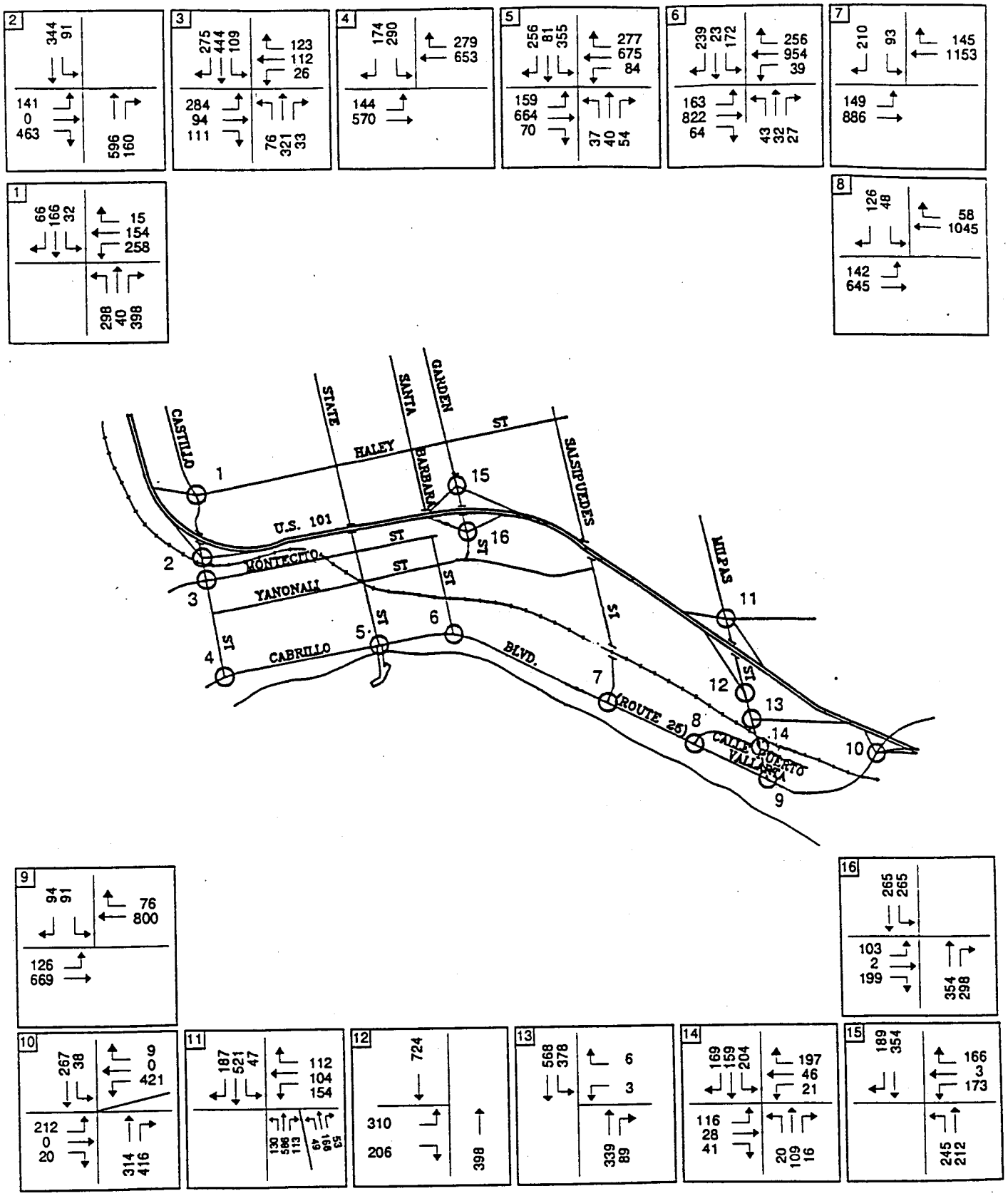
NOT TO SCALE

SOURCE: Omni-Means

FIGURE VIA-10

EXISTING + CUM. + PROJECT WITH SALSIPUEDES/GARDEN STREET EXTENSIONS FRIDAY PM PEAK HOUR VOLUMES

INTERFACE



NOT TO SCALE

SOURCE: Omni-Means

FIGURE VIA-11

EXISTING + CUM. + PROJECT WITH SALSIPUEDES/GARDEN STREET EXTENSIONS SUNDAY PM PEAK HOUR VOLUMES

INTERFACE

TABLE VIA-8
WEEKDAY PM PEAK HOUR
LOS & VOLUME/CAPACITY RATIO

Intersection	E	E+C	E+C+P	E+C+P w/S	E+C+P w/S&G
1. Castillo/101 NB-Haley	B 0.64	B 0.68	B 0.68	B 0.68	B 0.68
2. Castillo/101 SB	A 0.56	A 0.58	A 0.59	A 0.59	A 0.59
3. Castillo/Montecito*	**C 0.78**	B 0.61	B 0.61	B 0.61	B 0.61
4. Castillo/Cabrillo	A 0.55	A 0.58	A 0.58	A 0.58	A 0.58
5. Cabrillo/State	B 0.61	B 0.63	B 0.63	B 0.63	B 0.63
6. Cabrillo/Santa Barbara	A 0.42	A 0.46	A 0.50	A 0.49	A 0.53
7. Cabrillo/Salsipuedes	A 0.31	A 0.34	A 0.39	A 0.46	A 0.46
8. Cabrillo/Puerta Vallarta	A 0.43	A 0.45	A 0.46	A 0.40	A 0.36
9. Cabrillo/Milpas	A 0.43	A 0.44	A 0.45	A 0.40	A 0.37
10. Cabrillo/101	**F N.A.**	**F N.A.**	**F N.A.**	**F N.A.**	**F N.A.**
11. Milpas/101 NB-Carp.	**D 0.85**	**D 0.86**	**D 0.87**	C 0.83	D 0.80
12. Milpas/101 SB ramp	A 0.48	A 0.50	A 0.50	A 0.46	A 0.46
13. Milpas/101 SB- I.M.	C 0.77	**C 0.79**	**C 0.80**	B 0.72	C 0.69
14. Milpas/Puerta Vallarta	A 0.54	A 0.55	A 0.56	A 0.49	A 0.46
15. Garden/101 NB	A 0.58	B 0.63	B 0.64	B 0.64	B 0.66
16. Garden/101 SB	B 0.68	C 0.73	C 0.74	C 0.74	C 0.77

E = Existing, C = Cumulative, P= with Project trips, S&G = with Salsipuedes & Garden
S = with Salsipuedes extension only.
N.A. = Not Applicable; unsignalized intersection does not yield v/c ratio.

* Castillo/Montecito cumulative conditions reflect planned intersection improvements.

TABLE VIA-9
WEEKEND PM PEAK HOUR
LOS & VOLUME/CAPACITY RATIO

Intersection	E	E+C	E+C+P	E+C+P w/S	E+C+P w/S&G
1. Castillo/101 NB-Haley	A 0.40	A 0.42	A 0.42	A 0.42	A 0.42
2. Castillo/101 SB	A 0.51	A 0.53	A 0.53	A 0.53	A 0.53
3. Castillo/Montecito*	**C 0.77**	B 0.68	B 0.68	B 0.68	B 0.68
4. Castillo/Cabrillo	B 0.60	B 0.62	B 0.63	B 0.63	B 0.64
5. Cabrillo/State	C 0.71	C 0.73	C 0.74	C 0.74	C 0.74
6. Cabrillo/Santa Barbara	B 0.62	B 0.67	C 0.71	C 0.71	C 0.77
7. Cabrillo/Salsipuedes	A 0.50	A 0.52	A 0.59	B 0.66	B 0.67
8. Cabrillo/Puerta Vallarta	B 0.64	B 0.65	B 0.67	B 0.60	A 0.57
9. Cabrillo/Milpas	A 0.53	A 0.53	A 0.54	A 0.48	A 0.46
10. Cabrillo/101	**F N.A.**	**F N.A.**	**F N.A.**	**F N.A.**	**F N.A.**
11. Milpas/101 NB-Carp.	0.69	C 0.71	C 0.71	B 0.67	B 0.64
12. Milpas/101 SB ramp	A 0.38	A 0.39	A 0.40	A 0.36	A 0.36
13. Milpas/101 SB- I.M.	B 0.63	B **0.67**	B 0.68	B 0.60	A 0.57
14. Milpas/Puerta Vallarta	A 0.52	A 0.55	A 0.56	A 0.49	A 0.46
15. Garden/101 NB	A 0.31	A 0.37	A 0.39	A 0.39	A 0.47
16. Garden/101 SB	B 0.40	A 0.44	A 0.46	A 0.46	A 0.52

E = Existing, C = Cumulative, P= with Project trips, S&G = with Salsipuedes & Garden
S = with Salsipuedes extension only.
N.A. = Not Applicable; unsignalized intersection does not yield v/c ratio.

* Castillo/Montecito cumulative conditions reflect planned intersection improvements.

TABLE VIA-10
PEAK HOUR INTERSECTION OPERATING CONDITIONS CUMULATIVE WITH PROJECT PLUS SALSIPUEDES STREET AND GARDEN STREET EXTENSIONS

Intersection	Control Device	Cumulative + Project Friday Peak LOS V/C	Cumulative + Project Sunday Peak LOS V/C	Cml. + Prj. W/Extensions Friday Peak LOS V/C	Cml. + Prj. W/Extensions Sunday Peak LOS V/C
1. Castillo/101 N-Haley	S	B 0.68	A 0.42	B 0.68	A 0.42
2. Castillo/101 SB	S	A 0.59	A 0.53	A 0.59	A 0.53
3. Castillo/Montecito*	S	B 0.61	B 0.68	B 0.61	B 0.68
4. Castillo/Cabrillo	S	A 0.58	B 0.63	A 0.58	B 0.63
5. Cabrillo/State	S	B 0.63	C 0.74	B 0.63	C 0.74
6. Cabrillo/Santa Barbara	S	A 0.50	C 0.71	A 0.53	C 0.75
7. Cabrillo/Salsipuedes	S	A 0.39	A 0.58	A 0.46	B 0.66
8. Cabrillo/Puer Vallarta	S	A 0.46	B 0.67	A 0.36	A 0.56
9. Cabrillo/Milpas	S	A 0.45	A 0.54	A 0.37	A 0.46
10. Cabrillo/101	U	**F N.A.**	**F N.A.**	**F N.A.**	**F N.A.**
11. Milpas/101 NB-Carp.	S	**D 0.87**	C 0.71	**D 0.83**	B 0.64
12. Milpas/101 SB ramp	S	A 0.50	A 0.40	A 0.46	A 0.35
13. Milpas/101 SB- I.M.	S	**C 0.80**	B 0.68	B 0.69	A 0.57
14. Milpas/Puer Vallarta	S	A 0.56	A 0.56	A 0.46	A 0.46
15. Garden/101 NB	S	B 0.64	A 0.39	B 0.66	A 0.42
16. Garden/101 SB	S	C 0.74	A 0.46	C 0.77	A 0.48

* Castillo/Montecito cumulative conditions reflect planned intersection improvements.
Bold type text identifies intersections significantly impacted.
Control Device: S = Signalized, U = Unsignalized
N.A. = Not Applicable; unsignalized intersection does not yield v/c ratio.

Even with the addition of the Salsipuedes Street and Garden Street extensions, the intersection of Cabrillo/101 Ramps would continue to operate at LOS "F", therefore the intersection would still have a significant cumulative impact.

It should be recognized that this scenario includes those projects which are considered to be "reasonably foreseeable future projects" under CEQA. The scenario does not include potential future redevelopment in the Waterfront Area, which may be extensive and which will likely have considerable planning implications for traffic increases and circulation in the area.

It should also be noted that the Garden Street extension would displace a portion of the proposed Park parking but would allow an increase in parking at both the existing City lot at Cabrillo/Santa Barbara Streets and the new lot accessed by Mason Street. With this scenario, there would be a net increase of 21 spaces as compared to the project without Garden Street extended. As a result of this 21 space increase, the 74 space parking demand generated by the park would be met by on-site parking (15 spaces), the new lot on Mason Street (33 spaces) and the additional spaces in the existing City lot (35 spaces). Therefore, a short-term parking deficit of 12 spaces would be mitigated long-term through the creation of new City parking resulting from extending Garden Street.

2.5.5 County of Santa Barbara Congestion Management Plan

In June, 1990 California voters approved legislation which increased funding for California's transportation system. With the passage of Proposition 111, there were new requirements for the transportation planning process that require urbanized counties, such as Santa Barbara County, to prepare, adopt, and annually update a Congestion Management Program (CMP). The intent of the CMP is to address congestion problems on state highways and principle arterials in a coordinated manner between state, regional, county and city transportation and land use planning agencies, transit providers and air pollution control districts. The CMP applies to all the cities and the unincorporated area in the County of Santa Barbara.[21]

The CMP Roadway Network for the project area includes Cabrillo Boulevard, State Street, and U.S. Highway 101 and the major intersections along this network. For this Roadway Network, the CMP establishes a minimum acceptable roadway level of service (LOS D; volume/capacity (v/c) ratio = 0.81 to 0.90 or the existing LOS of the facility, whichever is worse). To establish the LOS baseline measurement, extensive monitoring of the CMP system was conducted with the cooperation of the cities, the county and Caltrans. Monitoring results indicate that several intersections, including the signalized intersections of U.S. 101 Northbound Ramps/Milpas Street and Castillo Street/Montecito Street which are located in the vicinity of the proposed project, operate at LOS D. However, improvements are planned for the Castillo St./Montecito St. intersection which would improve the operating condition well above LOS D.

The CMP also includes a transportation demand management (TDM) element aimed at reducing the rate of growth in single occupant vehicle usage. The City of Santa Barbara has adopted a TDM program which meets the most stringent requirements of this element, although the City is not currently required to do so. The Santa Barbara County Association of Governments (SBCAG), authors of the CMP, adopted a determination at their February 18, 1993 meeting which finds that the City of Santa Barbara (among others) is conforming to the adopted Congestion Management Plan.

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21 Congestion Management Plan, Santa Barbara County, Adopted January 1993.

The CMP contains a land use program that focuses on analyzing proposed development rather than existing land uses. The SBCAG believes that extending the scope of EIR traffic studies to include impacts to the CMP system is the most expeditious way to implement the Land Use Analysis element. The following are thresholds and guidelines for project-level CEQA analysis of CMP system impacts.

Project Size - A project should be evaluated for potential impacts to the "off site" CMP system if total trip generation exceeds 50 peak hour trips or 500 daily trips.

Traffic Assignment - Assignment of trips to the CMP system normally should be carried out no further than two signalized intersections from the project site (excluding signals at non-arterial streets), or to the nearest freeway interchange, regardless of jurisdictional boundaries. The area of project impact may be extended at the discretion of the traffic engineer of SBCAG, subject to an analysis of market area for the proposed use, origin-destination surveys, or similar studies. In no case should project-added volumes less than 10 peak hour trips be considered in analysis of a CMP system impact.

Significant Impacts - The following are guidelines as to what constitutes a significant impact to the CMP system. 1) For any roadway or intersection operation at LOS A or B, a decrease of two levels of service from project-added traffic. 2) For any roadway or intersection operating at LOS C, project-added traffic that results in a LOS D or worse. 3) For intersections on the CMP system with existing congestion, the following table will define significant impacts.

LOS	*Added Peak Trips*
D	*20*
E	*10*
F	*10*

The proposed project would not create a significant, adverse traffic impact, as defined by the criteria above, and would therefore be considered potentially consistent with the CMP. All potentially significant, adverse impacts to area intersections would be mitigated by extending Salsipuedes Street and by installing traffic signals at the Cabrillo/U.S. 101 Ramps intersection. The intersection of U.S. 101 Northbound Ramps/Milpas Street would be improved above existing conditions as a result of implementing project-required mitigation measures. In addition, the City has just begun improvements to the Castillo/Montecito Street intersection.

No interjurisdictional impacts (to neighboring jurisdictions) would result from this project.

2.5.7 Summary of Impacts

Development of the proposed Waterfront project would result in project specific significant impacts in the following areas:

- Project access on Salsipuedes Street
- Available parking supply and traffic due to construction trucks
- Operating conditions at the proposed hotel portion of the site's access on Salsipuedes Street could be hindered by an existing median and no left-turn lane into the project site
- Occasional parking supply deficits (usually 100 or fewer spaces) could result from special events occurring at the proposed project due to overflow parking

- Potential traffic disruption could occur due to construction trucks during construction.
- Operating conditions without the proposed project at three of the studied intersections, Milpas/Highway 101 NB Ramps-Carpinteria, Milpas/Highway 101 SB Ramp, and Cabrillo/Highway 101 Ramps, would not be within City standards for intersection performance due to traffic increases from cumulative development.

Improvement measures for the identified impacts are described in the following sections.

3.0 Mitigation Measures

In order to mitigate impacts identified in the impact analysis above, the following mitigation measures would be required. Given the length and technical nature of this section, the mitigation measures are divided into sections which correspond to the impact analysis discussion above.

3.1 Short-term Construction

- To reduce the potential for traffic disruption due to construction truck travel, a truck routing plan shall be submitted to the City Transportation Division for review and approval prior to issuance of Grading Permits. In the absence of a location for the imported fill, it would be premature to identify a route in this EIR. The most appropriate route would be Highway 101 via the Garden Street interchange. Neither the Cabrillo/101 nor the Milpas/101 interchanges shall be used for heavy truck traffic.

- To avoid conflicts between queuing trucks and through traffic, trucks shall queue on-site, not along Cabrillo Boulevard. To facilitate truck entry onto Cabrillo Boulevard, a brief acceleration lane shall be designated (outside the westbound curb lane). A traffic control person shall assist in directing traffic when trucks are entering the traffic flow on Cabrillo.

- A parking plan shall be submitted for review and approval to the City Transportation Division prior to the issuance of Grading Permits. The plan shall address the parking needs of construction employees in such a way as to minimize off-site parking impacts. Some construction employees could park along Salsipuedes Street. Excess demand could be accommodated in the adjacent Red Lion Resort parking lot or on-site after grading is completed.

3.2 Project Trip Generation and Distribution

The proposed Waterfront project would not have a significant, project-specific impact on the existing street network or intersection in the study area under the City's standards, and therefore no mitigation is necessary.

3.3 Project Access and Parking

At the proposed park portion of the site, the combination of peak weekend demand and displacement of existing spaces would exceed the proposed on-site parking supply. There does not appear to be any readily feasible means for increasing the parking supply either on the park portion of the site or in the immediate area. In the absence of any feasible short-term mitigation, the excess parking demand is an unavoidable,

significant, adverse impact. This impact would be mitigated in the long-term by the extension of Garden Street and the creation of 21 additional parking spaces. The following measures are required to reduce hotel portion of the site access and parking impacts to acceptable levels.

- To ensure adequate access to the hotel portion of the site via the driveway on Salsipuedes Street, the existing median shall be shortened and a left-turn lane to store vehicles entering the project shall be provided.

- To reduce the potential for vehicle conflicts at the park's mid-block driveway on Cabrillo Boulevard, the driveway shall be designed to restrict access to right turns in/out.

- An agreement which guarantees the availability of at least 100 spaces of surplus parking at the Red Lion Resort shall be entered into as parking mitigation prior to issuance of Certificate of Occupancy. The use of surplus Red Lion Resort parking would be more than adequate to accommodate occasional overflow parking from the proposed hotel portion of the site. It is also recommended that the project's operation include provisions whereby any large special event would require an application to the City and coordination with activities scheduled at the adjacent Red Lion Resort. The City shall be a party to this agreement which would be in effect unless additional parking is provided. The agreement shall also include an annual reporting procedure. If overflow parking cannot be provided in the Red Lion lot, additional parking spaces shall be provided on site or in close proximity to the hotel portion of the site.

3.4 Cumulative Impacts Mitigation Measures

There are several intersections already experiencing congestion with existing traffic volumes (and no specific improvements are programmed). With increases from cumulative traffic, some intersections would become more congested. The Castillo/Montecito intersection operates at LOS "C", V/C ratio 0.78 or lower, during the peak hour. Improvements to this intersection are approved and scheduled for implementation. With these improvements, the intersection will operate within accepted levels of service. However, four intersections currently experience operating conditions in excess of the City standards for level of service during the peak hour. The following mitigation measures would be required:

- The Salsipuedes Street extension shall be constructed to improve operating conditions on Milpas Street. The cumulative-plus-project weekday peak hour traffic conditions at the Milpas/101 Northbound Ramps/Carpinteria intersection were calculated to operate at LOS "D" (V/C = 0.87) without street improvements and LOS "D" (V/C = 0.83) with the Salsipuedes Street extension operational. The weekday peak hour cumulative-plus-project conditions at the Milpas/101 Southbound on-ramp-Indio Muerto intersection was calculated to operate at LOS "C" (V/C = 0.80) without street improvements and LOS "C" (V/C = 0.72) with the Salsipuedes extension. The Cabrillo/Salsipuedes intersection was calculated to operate at LOS "A" (V/C = 0.58) or better without street improvements, and LOS "B" (V/C = 0.66) as a result of the added peak hour trips with Salsipuedes Street extended. Weekday peak hour operation at the Milpas Street intersections were calculated to operate within accepted standards, with or without Salsipuedes Street extended. With the extension, the intersections would operate at LOS "B" or better. The Salsipuedes Street extension would result in both the Milpas/101 Northbound Ramps-Carpinteria and Milpas/101 SB Onramp-Indio Muerto operation being improved to better than existing conditions. The Salsipuedes Street extension is needed to mitigate cumulative traffic impacts (including those generated by the proposed project) at these key intersections along Milpas Street. In order to be

consistent with the findings necessary for the project's Development Plan Approval, Salsipuedes Street shall be extended prior to issuance of Certificate of Occupancy.

Section 15126 of the State CEQA Guidelines states that "all phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation". Therefore, potential impacts in the areas of traffic, air quality, risk of upset, archaeology, and hazardous materials which may be created as a result of the extension are analyzed in this EIR. The reader is referred to the aforementioned sections and the Land Use Considerations section for further information. Southern Pacific Transportation Company, who owns a portion of the land which the street extension would cover, has expressed a willingness to cooperate with the City in its acquisition of the land for roadway purposes.

- The Cabrillo/Highway 101 Southbound On/Off-ramps-Northbound Off-ramp intersection is stop controlled and currently operates at LOS "F". A traffic signal shall be installed at this intersection prior to Certificate of Occupancy to improve operating conditions. Installation of a traffic signal would improve existing conditions to LOS "C" (V/C = 0.73) during the Friday p.m. peak hour and LOS "C" (V/C = 0.79) during the Sunday p.m. peak hour. With cumulative baseline development, the signal would improve Friday and Sunday peak hour conditions to LOS "C" (V/C = 0.74) and LOS "C" (V/C = 0.79), respectively. With the addition of project trips, the signalized intersection would operate at LOS "C" (V/C = 0.74) and LOS "D" (V/C = 0.81), an improvement over existing unsignalized conditions (LOS "F").

  It should be noted that this signalization should be considered an interim measure. A planned widening of Highway 101 (in the next 5-7 years) would also affect the interchange. It is not clear at this time what portion of the signalization improvements would need to be modified. Mr. Wayne Schnell of Caltrans has indicated that Caltrans has reviewed the idea of signalization at this intersection and has no concerns at this time about installing signals as a temporary measure.[22] The City and Caltrans would still have to coordinate the specific details of signal installation. If signalization appears to be infeasible, consideration could be given to a "roundabout" intersection design as an alternative. An initial roundabout installation at State Route 144/Alameda Padre Serra is being reviewed by the City and Caltrans. Subject to City and Caltrans assessment of design and operation issues, a roundabout could be considered for the Cabrillo/Highway 101 Ramps intersection. In order to be consistent with the findings necessary for the project's Development Plan Approval, improvements to this intersection must be in place prior to issuance of Certificate of Occupancy.

- The project shall include a Transportation Demand Management Program. The program shall be reviewed and approved by the City and implemented by the applicant prior to issuance of Certificate of Occupancy. The program could include the following types of measures:

  - provision of preferential parking spaces for employees that carpool
  - purchase and free distribution of MTD bus passes to employees
  - notification to employees of MTD route/schedule information and ride sharing programs
  - institution of flexible work hours
  - provision of bicycle spaces and locker-room facilities to encourage bicycle commuting

[22] Personal communication with Wayne Schnell, Intergovernmental Review Coordinator with Caltrans on March 8, 1993, confirmed by comment letter of April 13, 1993.

- scheduling deliveries outside of peak traffic periods.

3.5 Recommended Mitigation Measures

With the Salsipuedes Street extension, operating conditions would improve on Milpas Street while the Salsipuedes Street intersection's level of service would decline somewhat but would continue to operate at LOS "B" (V/C 0.66) or better. Although the Milpas/Highway 101 NB Ramps-Carpinteria intersection conditions would improve, this location would continue to experience operating conditions above standard levels. Intersection modification improvements are limited, as discussed above. Implementation of the interchange reconstruction under consideration would improve the operating conditions at the Milpas/Highway 101 NB Ramps-Carpinteria intersection and the Milpas/Highway 101 SB Ramp-Indio Muerto intersection. Although not needed to mitigate the cumulative plus project impacts, the following measure is recommended:

- The combination of the Salsipuedes and Garden Street extensions would further improve intersection operation at Milpas/101 NB Ramps-Carpinteria and Milpas/101 SB Onramp-Indio Muerto. These improvements suggest that the Garden Street extension be recommended as a further mitigation measure. However, reconstruction of the Milpas/Highway 101 interchange would appear to mitigate residual impacts at the interchange intersections. Thus, the interchange modification could proceed in advance of the Garden Street extension and provide the recommended improvement.

- The project includes an uncontrolled crosswalk as part of the project description. However, as indicated by the traffic engineer, the volume of pedestrians that will be generated by the park component may not warrant a crosswalk. Additionally, inclusion of an uncontrolled crosswalk may result in adverse safety impacts in that uncontrolled crosswalks are more hazardous than controlled signal crosswalks. Therefore, if it is determined that a crosswalk will be required as part of this project, it shall be signalized.

4.0 Residual Impact Statement

Implementing the required mitigation measures would mitigate the project's significant impacts on access, trip generation and construction. Existing operating conditions at two intersections, Cabrillo/Highway 101 Ramps and Milpas/Highway 101 NB Ramps-Carpinteria, exceed standard limits. With traffic growth from cumulative development (without the project), conditions at three intersections, Cabrillo/Highway 101 Ramps, Milpas/Highway 101 NB Ramps-Carpinteria and Milpas/Highway 101 SB On-ramp-Indio Muerto, would exceed standard limits.

Signalizing the Cabrillo/Highway 101 Ramps intersection would considerably improve existing and cumulative operating conditions. Although much improved, the intersection would continue to exceed the City's standard LOS limit during the Sunday peak hour without further measures, which would require extensive improvements to the intersection. With the project trips added to cumulative volumes, the intersection, if signalized, would operate considerably better than cumulative conditions without signalization, but would operate above the City's standard limit during the Sunday peak hour.

The Milpas Street cumulative operating conditions with the proposed project were also analyzed accounting for the Salsipuedes Street and Garden Street extensions together and the Salsipuedes Street extension separately. Operating conditions with both extensions would result in better than existing

conditions at all Milpas Street intersections, and all but the Milpas/Highway 101 NB Ramps-Carpinteria would operate within the City's standard levels. The studied Garden Street intersections would decline somewhat in operation but would continue to operate efficiently. With only the Salsipuedes Street extension, the Milpas/Highway 101 NB Ramps-Carpinteria intersection would experience somewhat greater congestion (in comparison to the option with both extensions), but the operation would be an improvement from the current conditions. Implementation of the required mitigation measures would reduce project-specific and cumulative impacts to less than significant levels.

The only residual parking impact would be a weekend deficit at the proposed park portion of the site. As a result of the absence of any feasible short-term parking improvements, this would remain a significant, unavoidable impact which cannot be mitigated. This impact would be mitigated in the long-term by the extension of Garden Street and the creation of 21 additional parking spaces.

B. AIR QUALITY

1.0 Background and Environmental Setting

1.1 Air Quality Characteristics

Air quality for a given locale is described by the concentration of various pollutants in the atmosphere, which are generally expressed in units of parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$). Air quality is determined by the type and amount of pollutants emitted into the atmosphere, the size and topography of the air basin and the prevailing meteorological conditions. The significance of a pollutant concentration is determined by comparing it to state and/or federal ambient air quality standards. These standards represent the maximum allowable atmospheric concentrations of various pollutants which may occur and still protect public health and welfare, with a reasonable margin of safety. At the national level, the Federal Clean Air Act required the U.S. Environmental Protection Agency to establish national ambient air quality standards (NAAQS); the NAAQS may not be exceeded more than once a year, except annual standards, which may never be exceeded. In California, the task of air quality management and regulation has been legislatively granted to the California Air Resources Board (CARB), with subsidiary Air Pollution Control Districts (APCDs) at the County level. The CARB establishes California Ambient Air Quality Standards (CAAQS) and is responsible for regulation of mobile sources. The CAAQS are never to be equaled or exceeded, depending on the pollutant type. APCDs enforce and regulate stationary emission sources. The CARB has established 14 air basins in the State; Santa Barbara is located within the South Central Coast Air Basin, within the portion which is administered by the Santa Barbara County Air Pollution Control District.

Primary criteria pollutants are emitted directly from a source (e.g., an automobile) into the atmosphere and include carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2) and particulates.[23] Reactive organic compounds (ROC) are also a primary pollutant, but are not a "criteria" pollutant (e.g., they are not subject to CAAQS or NAAQS criteria). Secondary pollutants are created by atmospheric chemical and photochemical reactions. Secondary pollutants include oxidants, ozone (O_3) and sulfate particulates; these oxidants are commonly referred to as "smog".

1.2 Region of Influence (ROI)

The area affected by project construction and operational emission sources would generally include the City of Santa Barbara. Likewise, since the project would be staffed by members of the local community, emissions from commuter traffic to and from the project site should be limited to the South Coast.[24] Guests of the Hotel and Youth Hostel would primarily be comprised of visitors from outside the local area; however, for purposes of analyzing air quality impacts, it is assumed that such visitors would be attracted to the Santa Barbara area with or without the proposed project, and therefore long-distance travel to reach

[23] Particulate matter is generally comprised of inert particles that become airborne, such as dust or ash. Particulate matter which is less than 10 microns in diameter is referred to as PM_{10}.

[24] Specifically identifying the region of influence (ROI) for air quality requires knowledge of the pollutant type, source emission rates and release parameters (e.g., stack height), the proximity of project emission sources to other emission sources, and local and regional meteorology. For inert pollutants (other than O_3 and sulfates [SO_4]), the ROI is generally limited to a few miles downwind from a source.

the project is not considered in the analysis.[25]

The ROI for O_3 may extend much farther downwind than for inert pollutants. Ozone is a secondary pollutant formed in the atmosphere by photochemical reactions of previously emitted pollutants or precursors. Ozone precursors are mainly reactive organic compounds (ROC) and nitrogen oxides (NO_x). In the presence of solar radiation, the maximum effect of precursor emissions on O_3 levels usually occurs several hours after they are emitted and therefore many miles from the source. Ozone and O_3 precursors transported from other regions can also combine with local emissions to produce high local O_3 concentrations. Therefore, the region of influence for O_3 impacts may include much of Santa Barbara County.

1.3 Regional Climate and Weather

The climate of the project area is Mediterranean, characterized by warm, dry summers and mild, wet winters. The major influence on the regional climate is the Eastern Pacific High, a strong persistent anticyclone. Seasonal variations in the position and strength of this system are a key factor in producing weather changes in the area.

The Pacific High attains its greatest strength and intensity during the summer, when it is centered west of Northern California. As winter approaches, this system usually weakens and shifts to the south, allowing polar storms to pass through the area. These storms produce periods of cloudiness, strong shifting winds and precipitation. The number of days with precipitation can vary greatly from year to year, resulting in a wide range of annual precipitation totals. Storm conditions are usually followed by periods of clear skies, cool temperatures and gusty northwest winds as the storm systems move eastward.

Due to the large-scale subsidence associated with the Pacific High, an elevated temperature inversion often occurs along the West Coast. The effect of this elevated inversion is to create a lid on the vertical dispersion of pollutants in the lower atmosphere. Localized surface-based inversions are also quite common during the early morning hours and the colder months of the year.

Fog and stratus clouds often form in the cool, marine air below the base of the elevated inversion. Conditions favorable for their formation usually occur during the months of May through October, when the subsidence inversion is most common. Typically, the stratus forms offshore and moves into the coastal plains and valleys during the evening hours. As the land heats up the following morning, the clouds will burn off to the immediate coastline, then reform again the following evening.

Due to the moderating effect of the Pacific Ocean and lower elevation, temperatures are less extreme along the coastal sections compared to more inland locations. Maximum temperatures during the summer months average in the 70s (degrees Fahrenheit) along the coast to the high 80s in the Santa Ynez River valley. Minimum summer temperatures average in the 50s to low 60s over most of the project area. Maximum temperatures during the winter months average in the mid 60s along the coast to the 50s inland. Minimum winter temperatures are usually in the 30s and 40s over most of the project area.

The proximity of the Pacific High combined with a thermal low pressure system in the southwest interior desert region results in a prevailing northwest wind flow along the coast of central California. However, due to the blocking effect of the Santa Ynez Mountains and deflection of these winds around Point

[25] The origin and future destination (post-hotel stay) of guests using the proposed hotel facility are unknown and an attempt to quantify travel characteristics would, therefore, be speculative.

Conception, daytime sea breezes are usually from the south to southwest along the southern Santa Barbara County coast. Light northerly land breezes usually occur at night in the Santa Barbara region, including the project site. These land breezes may extend many miles offshore during the colder months of the year until daytime heating reverses the flow back onshore. High pollutant impacts can occur during these conditions, when nighttime land breezes transport pollutants from the onshore area over the ocean and return them the following morning with the onset of the sea breeze. These pollutants can combine with local emissions onshore and result in high pollutant impacts.

Another situation that can lead to high pollutant concentrations in the project area results form the buildup of high pressure in the Great Basin and is known as a "Santa Ana" condition. This condition can produce strong northeast winds in Southern California, but generally light, east to southeast winds occur in the project area. Santa Ana conditions often result in the transport of pollutant-laden air from the Los Angeles urban area to Santa Barbara County. Since stagnant atmospheric conditions usually occur in Santa Barbara County during a Santa Ana, local emissions combined with pollutants transported from Los Angeles can lead to substantial O_3 impacts in the project area.

Over 90 percent of the total annual precipitation in the project area occurs from November through April. Annual precipitation is approximately 18 inches along the Santa Barbara coast and in the project vicinity, increasing to 32 inches at San Marcos Pass in the Santa Ynez Mountains. Although the overwhelming majority of precipitation in the project area is produced by winter storm systems from the North Pacific, summer tropical moisture can also produce clouds and rainfall. This moisture is transported into the project area from northwest Mexico or from tropical storms off the west coast of Mexico that move northward and dissipate into Southern California. However, precipitation from tropical air masses is rare and usually occurs from July through September.

1.4 Baseline Air Quality

The EPA has designated all areas of the United States as having air quality better than (attainment) or worse than (nonattainment) the NAAQS. The criteria for nonattainment designation varies by pollutant: (1) an area is in nonattainment for O_3 if its NAAQS has been exceeded more than three discontinuous times in three years; and (2) an area is in nonattainment for any other pollutant if the applicable NAAQS for that pollutant has been exceeded more than once per year. Presently, Santa Barbara County is in attainment with NAAQS for CO, SO_2, NO_2, and PM_{10}. Santa Barbara County is presently in nonattainment with NAAQS for O_3.

The CARB has also designated areas of the state that are in attainment or nonattainment of the CAAQS. An area is in nonattainment for a pollutant if the applicable CAAQS for that pollutant has been exceeded more than once in three years. Presently, Santa Barbara County is in nonattainment with CAAQS for O_3 and PM_{10}, and in attainment for NO_2, SO_2, CO, SO_4, and lead. The County is in attainment for hydrogen sulfide, except for portions of the Santa Maria Valley and Solomon Hills. Santa Barbara County is currently unclassified for visibility[26].

The classification of an air basin, or portion of an air basin, as "non-attainment" triggers the requirement for the preparation of an Air Quality Attainment Plan (AQAP) by the governing APCD. The AQAP is intended to identify methods and programs for improving air quality to meet applicable standards, and is a

[26] Personal Communication with APCD staff, October 27, 1992. A region, based upon ambient pollutant concentrations, may be designated as unclassified when there is a lack of data for the EPA to form a basis of attainment status.

valuable long-range planning tool for air quality management. The Santa Barbara County APCD has recently adopted the 1991 Air Quality Attainment Plan (AQAP) to address violations throughout the County.

A system of monitoring stations which measure ambient air quality has been established at various locations around Santa Barbara County to assist in the enforcement of the above-referenced standards. The air quality monitoring station closest to the project site is the Santa Barbara station which is located within a mile of the project. Monitoring results from the Santa Barbara station would be representative of air quality in the project vicinity. Table VIB-1 summarizes the maximum concentrations of various pollutants in the Santa Barbara area from 1986 to 1991. The pollutants of primary concern are ozone and PM_{10}.

Appendix D provides CAAQS and NAAQS information for criteria pollutants. Maximum annual concentrations for criteria pollutants of concern in Santa Barbara are summarized in Table VIB-1; further discussion on ambient pollutant levels is provided below.

1.4.1 Ozone (O_3)

Ozone is created in the atmosphere through a photochemical process, rather than emitted directly into the air. Reactive organic gases, including hydrocarbons and oxides of nitrogen, are the emitted contaminants which participate in the reaction, which is carried out in the presence of sunlight. Ozone concentrations are generally the highest during the summer months and coincide with the period of maximum insolation. Maximum O_3 concentrations tend to be regionally distributed, due to precursor emissions being homogeneously dispersed in the atmosphere.

Ozone is a pungent, colorless toxic gas; the common manifestations of ozone are damage to vegetation and cracking of untreated rubber. Ozone in high concentrations can also directly affect the lungs causing respiratory irritation and possible changes in lung functions. In the period 1986-199, the O_3 NAAQS was exceeded on five days in the sub-region of the project, as measured at the Santa Barbara monitoring station. The more stringent CAAQS for O_3 was exceeded on twenty-nine days during this period, as measured at the same monitor location.[27]

1.4.2 Carbon Monoxide (CO)

Carbon monoxide is a colorless, odorless, toxic gas produced by incomplete combustion of carbon-containing substances. Carbon monoxide does not participate in any photochemical pollutant reactions, and is therefore considered inert. Inert pollutant concentrations tend to be the greatest during the winter and are a product of light wind conditions and surface-based inversions. Maximum inert pollutant concentrations are usually found near an emission source. The main sources of CO are motor vehicles and the highest ambient CO concentrations are found near congested transportation arteries and intersections. Carbon monoxide does not irritate the respiratory tract, but passes through the lungs directly into the blood stream and, by interfering with the transfer of fresh oxygen to the blood, deprives sensitive tissues of oxygen. CO is not known to have adverse effects on vegetation, visibility or materials (i.e., fabrics, rubber, limestone or granite). Neither California nor national standards for CO have been exceeded at the Santa Barbara monitoring station, or the remaining monitoring stations around Santa Barbara County. The monitoring results for CO concentrations from the Santa Barbara station are included in Table VIB-1.

[27] The state standard was revised from 0.10 ppm to 0.09 ppm in 1988. Monitoring data from APCD Annual Reports 1987-1991.

TABLE VIB-1
AMBIENT AIR QUALITY STANDARDS AND MAXIMUM POLLUTANT CONCENTRATIONS MEASURED ON A YEARLY BASIS

Pollutant/Monitor Station	Averaging Time	NAAQS Limit	CAAQS Limit	1986	1987	1988	1989	1990	1991
Ozone (ppm)									
Santa Barbara	1-hour	0.12	0.09	0.16	0.13	0.10	0.22	0.14	0.10
Carbon Monoxide (ppm)									
Santa Barbara	1-hour	35	20	18	14	15	11	11	11
	8-hour	9	9	8.6	6.4	8.8	7.4	6.8	6.4
Nitrogen Dioxide (ppm)									
Santa Barbara	1-hour	- -	0.25	0.16	0.14	0.11	0.12	0.11	0.16
Sulfur Dioxide (ppm)									
Santa Barbara	1-hour	- -	0.25	0.04	0.03	0.03	0.02	not samp.	not samp.
Sulfate (ug/m^3)									
Santa Barbara	24-hour	- -	25	15.0	12.9	14.6	10.4	not samp.	not samp.
PM - 10 (ug/m^3)									
Santa Barbara **	24-hour	150	50	47	51	72	83	96	96
	ann. geo. *	- -	30	24.0	25.5	28.4	40.8	34.5	33.5

* The standard is based upon the Annual Geometric Mean of samples obtained during the year.

** Sampling of PM_{10} was discontinued at the Goleta station in 1989, and the equipment was relocated to the Santa Barbara station. Therefore, sampling results prior to 1989 were obtained from the Goleta station, those from 1989 on were obtained from the Santa Barbara station.

Reference: 1990 Annual Air Quality Report, SBCAPCD

1.4.3 Oxides of Nitrogen (NOx)

There are a variety of oxides of nitrogen, but only two are important in air pollution. These are: nitric oxide (NO), a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure; and nitrogen dioxide (NO_2), a reddish-brown irritating gas formed by the combination of nitric oxide with oxygen.

Oxides of nitrogen are direct participants in photochemical smog reactions. The emitted compound, nitric oxide, combines with oxygen in the atmosphere in the presence of hydrocarbons and sunlight, to form nitrogen dioxide and ozone. Nitrogen dioxide, the most significant of these pollutants, can become visible in the atmosphere at concentrations as low as 0.5 ppm on days of 10-mile visibility. NO_2 is an important air pollutant in the region because it is a primary receptor of ultraviolet light which initiates the reactions producing photochemical smog. It also reacts in the air to form nitrate particulates. The highest recorded concentration at the Santa Barbara station between 1986 and 1991 was 0.16 ppm, as indicated in Table VIB-1. Neither California nor national NO_2 standards are exceeded in the County.

1.4.4 Sulfur Dioxide (SO_2) and Sulfates (SO_4)

SO_2 is a colorless, pungent, irritating gas formed primarily by the combustion of sulfur-containing fossil fuels. In humid atmospheres, some SO_2 may be changed to sulfur trioxide and sulfuric acid mist, with some of the latter eventually reacting with other materials to produce sulfate particulates.

At sufficiently high concentrations, sulfur dioxide irritates the upper respiratory tract. At lower concentrations, when in combination with particulates, SO_2 appears able to do still greater harm by injuring lung tissues. Sulfur oxides, in combination with moisture and oxygen, can yellow the leaves of plants, dissolve marble and eat away iron and steel. Sulfur oxides can also react to form sulfates which reduce visibility and cut down the light from the sun.

Sulfur dioxide concentrations are low in Santa Barbara, as displayed in Table VIB-1. No California or national air quality standards for SO_2 have been exceeded at monitoring stations around Santa Barbara County. The California sulfate standard also was not exceeded.

1.4.5 Particulate Matter

Atmospheric particulates are made up of finely divided solids or liquids such as soot, dust, aerosols, fumes and mists. The aerosols formed in the atmosphere, primarily sulfate and nitrate, are usually smaller than 1 micron. In areas close to major sources, particulate concentrations are generally higher in the winter, when more fuel is burned and meteorological conditions favor the build-up of directly-emitted contaminants. However, in areas remote from major sources and subject to photochemical smog, particulate concentrations are higher during summer months.

In the respiratory tract, very small particles (e.g., less than 10 microns in diameter, termed "PM_{10}") of certain substances may produce injury by themselves or may contain adsorbed gases that are injurious. Suspended in the air, particulates of aerosol size can both scatter and absorb sunlight, producing haze and reducing visibility.

Sampling of PM_{10} was discontinued at the Goleta Station in 1989 and the equipment was relocated to the Santa Barbara station. Therefore, sampling results prior to 1989 were obtained from the Goleta station; those from 1989 on were obtained from the Santa Barbara station. The California 24-hour standard of 50 micrograms per cubic meter (ug/m^3) was exceeded on one day in 1987, two days in 1988, fourteen days in 1989, four days during 1990, and eight days in 1981 at the Goleta/Santa Barbara station. The California annual geometric standard of 30 ug/m^3 was exceeded in 1989, 1990 and 1991, as measured in Santa Barbara. See Table VIB-1 for information pertinent to measurements obtained at the Santa Barbara station for this period. The national standard of 150 ug/m^3 was never exceeded at either monitoring station during the eight-year period summarized.

1.4.6 Lead (Pb)

Lead is emitted to the air primarily as a constituent of leaded gasoline. Lead concentrations in Santa Barbara have been reduced dramatically with restrictions on leaded fuel that have been implemented in the past fifteen years. For example, the highest monthly average lead concentration has gone from 1.36 g/m^3 in 1980 to 0.06 g/m^3 in 1988. Lead is a cumulative poison that can enter the body through inhalation or ingestion. Increasing amounts build up in the body and eventually a point is reached where symptoms and disability occur. Lead produces a brittleness of the red blood cells and produces a damaging effect on the organs or tissues with which it comes in contact. Lead concentrations in Santa Barbara are well below both California and national standards.

2.0 Applicable Standards and Thresholds

At the broadest level, the emission of pollutants into the air is governed by concentration limits specified under the NAAQS and CAAQS system. The APCD administers a permit system to ensure that stationary sources do not collectively create emissions which would cause these standards to be exceeded. Mobile source emissions (e.g., automobiles) are more difficult to control. The use of automobiles and management of transportation systems in a manner which would minimize emissions is generally governed by requirements set forth in an AQAP. The Congestion Management Program (CMP) also sets forth requirements to minimize emissions associated with the use of automobiles. One facet of new development review is contained in the CEQA environmental review process. CEQA requires that air quality impacts from a proposed project be assessed during environmental review of the project.

In order to facilitate the CEQA environmental review process, the City of Santa Barbara has adopted

thresholds of significance. With respect to air quality, the APCD has identified several thresholds which apply and are used by the City. A significant impact would occur with any of the following:

- if a project would cause ambient air quality to degrade below NAAQS or CAAQS;
- for construction, emission of ROC, NO_x, or PM_{10} in excess of 2.5 tons per three month period (termed a quarter); projects with anticipated construction emissions between 2.5 tons and 6.0 tons per quarter are required to incorporate best available control technologies (BACT) for emissions reductions, projected emissions above 6.0 tons per quarter require further emissions offsets;

- for long-term operation, combined direct and indirect emissions in excess of 2.5 pounds per peak traffic hour for the emission of NO or ROC (this would be a project-specific and cumulative impact);
- potential exceedance of the 1-hour CAAQS for CO and NO_x, associated with degradation of intersection performance as a result of project-induced traffic (modeling required for LOS D or below);
- if the project is determined to be inconsistent with the policies and measures in the adopted Air Quality Attainment Plan (AQAP) for the County of Santa Barbara.

3.0 Impact Analysis

3.1 Construction

The primary considerations for assessing construction emissions are the size of the site, the type and number of construction equipment and the duration of site preparation activities. The total site (including hotel, park and hostel) measures approximately 16.65 acres. The applicant compiled an equipment list and preliminary construction schedule for the project, to be used in this air quality analysis. In addition, since the extension of Salsipuedes Street would be required in order to accommodate project-related traffic increases, City Staff compiled an equipment list and tentative schedule for the construction of the Salsipuedes Extension for use in the construction emissions evaluation. The complete equipment list and schedule are included in the Air Quality Appendix of this EIR.

The construction process for the proposed project is anticipated to require approximately 16.5 months to complete, or 5 1/2 quarters (a quarter is comprised of three months). Emissions from the equipment suite were calculated based upon factors provided in the U.S. EPA Publication AP-42, as refined by APCD staff. The equipment emissions table in Appendix D provides emissions rates and emissions totals for each piece of equipment on a per quarter basis for comparison to the 2.5 ton/quarter threshold. The emissions table also provides a generic evaluation of dust generation from earthmoving activities, based upon the 1.2 ton per acre per month criteria employed by the Santa Barbara County APCD. Lastly, the emissions table evaluates emissions from diesel trucks used for the exportation and importation of earth and debris materials for the construction effort. Table VIB-2 below provides the summary of results of emissions associated with the construction activities of the proposed project. It should be noted that emissions calculations were based on full-day equivalents for each piece of equipment. Therefore, rather than indicating emissions related to one sub-task (e.g., two dozers used for one month, or two dozers used for 22 working days), the total time requirement for each piece of equipment per quarter was tallied and a composite figure produced.

Table VIB-2 summarizes emissions from site preparation activities, see Appendix D for detailed calculations.[28]

[28] U.S. EPA, Compilation of Air Pollutant Emission Factors, Volumes I & II.

TABLE VIB-2
Construction Emissions
(in tons/quarter)

Pollutants	NOx	PM_{10}	ROC
Quarter 1	8.84	15.58	0.82
Quarter 2	15.14	15.95	1.35
Quarter 3	5.91	4.83	0.52
Quarter 4	4.43	4.74	0.38
Quarter 5	5.75	5.04	0.59
Quarter 6*	1.78	2.66	0.23
Reduced Pollutant Levels With Incorporation of BACT			
Quarter 1	6.20	15.43	0.72
Quarter 2	10.63	15.79	1.20
Quarter 3	4.14	4.80	0.46
Quarter 4	3.10	4.74	0.33
Quarter 5	4.03	4.78	0.52
Quarter 6*	1.25	2.60	0.20

* Based on 1/2 quarter.

As illustrated in Table VIB-2, uncontrolled construction emissions in Quarters 1-5 for NO_x would exceed the County short-term emission significance threshold of 2.5 tons per quarter by a factor from approximately 2 to 6, indicating a significant short-term air quality impact. Since construction emissions of NO_x would be in excess of 2.5 tons for the referenced quarters, BACT would be required. The APCD recommends a BACT package for NO_x which includes reformulated diesel fuel, engine timing retarded two degrees and the use of high pressure fuel injectors. An emissions reduction of 30% for NO_x and 11% for ROC is credited to the project where this BACT package is applied. The lower half of Table VIB-2 indicates residual NO_x emissions levels with BACT. With BACT, Quarter 1 and Quarter 2 NO_x emissions would continue to exceed 6.0 tons per quarter (the maximum allowable limit with BACT). Therefore, an additional program capable of offsetting 4.63 tons of NO_x would be required. At the present time, there are no additional mitigations which have been reviewed and accepted by APCD staff.[29] **Therefore, short-term NO_x emissions would be considered significant and unavoidable.**

With twice daily watering of disturbed areas, PM_{10} emissions would still exceed the 2.5 tons threshold by a factor from approximately 2 to 6 in the first five quarters, while the threshold would be marginally exceeded in the sixth quarter. Use of chemical dust suppressants can reduce dust emissions further, but would not be anticipated to curtail dust generation by a factor of 6. **Short-term PM_{10} impacts would therefore be considered significant and unavoidable.**

ROC emissions from construction activities would fall below threshold levels and would, therefore, be insignificant. Accordingly, no mitigation measures would be required with respect to ROC emissions.

[29] Personal communication with Vijaya Jammalamadaka, APCD Air Quality Specialist, March 1993. APCD staff have not been able to quantify the emissions reductions which could be associated with other mitigation measures and, therefore, other measures are not sanctioned for use at this time.

3.2 Long-Term Impacts

With respect to long-term project emissions, Table VIB-3 summarizes anticipated pollutant emissions for average weekday and weekend day operation of the proposed project. The facility is proposed to operate seven days per week and the weekend use is anticipated to be more intense than the weekday use of the facility. Long-term emissions would be primarily related to the use of motor vehicles by future employees and guests of the proposed facility.[30] However, space- and water-heating on the project site would also produce emissions. To a lesser degree, kitchen operations would produce emissions, but there are no factors available to address emissions from commercial kitchen appliances. Therefore, the latter effect was not analyzed, but is assumed to be negligible compared to other long-term project emissions. The emissions in Table VIB-3 are based upon the 1995 model run of the URBEMIS3 program and upon stationary source emission data from EPA publication AP-42.[31]

TABLE VIB-3
Long-Term Air Pollutant Emissions
(in pounds/peak hour)

LAND USE	ROC	NOx	CO
Weekday	2.95	2.82	36.7
Weekend	4.59	4.49	56.9
On-Site Emissions	0.005	0.1	0.02
Weekend Including On-site	4.6	4.6	56.92
With TDM			
Weekend Including On-site	3.68	3.68	45.5
Weekday Including On-site	2.37	2.84	29.52

As shown in Table VIB-3, weekend operation of the proposed facility would generate long-term motor vehicle emissions which exceed the County of Santa Barbara long-term significance threshold of 2.5 pounds/peak hour for ROC and NO_x. The threshold would actually be exceeded by a factor of approximately 60%. Various transportation demand techniques and other measures can be capable of reducing long-term transportation-related emissions by 10-20%. The bottom half of the preceding table indicates the residual emissions level with incorporation of a required TDM program. As indicated, emissions would remain above the 2.5 pound per peak hour threshold. At the present time, there are no additional mitigations which have been reviewed and accepted by APCD staff to assure quantifiable reductions in long-term project emissions.[32] **Therefore, long-term ROC and NO_x emissions would be considered significant and unavoidable.**

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30 Emissions were calculated using the URBEMIS3 computer program provided by the California Air Resources Board. Results of the model runs of URBEMIS3 are provided in Appendix D.

31 Emission factors from Table 1.4-1 of AP-42 for residential and commercial boilers (less than 10,000,000 BTU/hour). It is assumed that the Hostel would have a boiler of approximately 400,000 BTU/hr capacity and with an average daily fuel consumption of approximately 240,000 cubic feet of natural gas. It is assumed that the Hotel would have a boiler of approximately 5,750,000 BTU/hr capacity, with an average daily fuel consumption of approximately 3,525,000 cubic feet of natural gas.

32 Personal communication with Vijaya Jammalamadaka, APCD Air Quality Specialist, March 1993. APCD staff have not been able to quantify the emissions reductions which could be associated with other mitigation measures and, therefore, other measures are not sanctioned for use at this time.

3.3 Carbon Monoxide/Nitrogen Dioxide Hot Spots

Idling vehicles at intersections with poor performance can result in localized concentrations of CO and NO_x which are elevated above the general ambient concentrations of these pollutants. For this reason, it is important to evaluate potential emissions which could be associated with poorly operating intersections. The Santa Barbara County APCD generally requires that modeling for CO and NO_x impacts be completed for any intersection which operates, or would be projected to operate, at a level of service D or below. The transportation engineers for this EIR have identified the following two intersections which would operate at or near LOS D as a result of traffic associated with developments on the cumulative projects list[33] :

- Milpas Street/Carpinteria Avenue/Northbound 101 Ramps
- Milpas Street/Indio Muerto Street/Southbound 101 Ramps

Estimated traffic circulation data at peak periods for each intersection were obtained from the traffic study prepared for the EIR by Omni-Means (refer to the Transportation/Circulation Section of this EIR for further discussion). The CO evaluation was originally completed based upon the assumption that the Garden Street improvements and Salsipuedes Street extensions required as mitigation measures in the Transportation/Circulation section are implemented.[34] Subsequently, City staff indicated that the Garden Street extension may not be a required project mitigation measure and, consequently, the evaluation was completed a second time with traffic information based upon extension of Salsipuedes Street, but not the extension of Garden Street.

Impacts from vehicular emissions at the two above-referenced intersections were calculated using CALINE4, a CARB-approved simulation model which is recommended for use by the Santa Barbara County APCD. The model relies upon vehicle emissions, site geometry, site characteristics (such as the proximity and size of buildings) and meteorological parameters to predict pollutant concentrations in the close vicinity of roadways. A CARB-approved methodology was applied to the analysis of these two intersections.

The CALINE4 analyses indicate that the 1-hour California Ambient Air Quality Standards (CAAQS) for CO and NO_2 would not be exceeded at either of the two intersections, even if the Garden Street Extension is not implemented. The highest CO concentration modeled during the peak-hour traffic flow was 17.1 ppm for the 1-hour averaging period. The highest concentration of NO_2 modeled was 0.08 ppm for the 1-hour averaging period. The maximum modeled CO concentration is only slightly below the 1-hour CAAQS of 20 ppm; therefore, if the Salsipuedes extension is not implemented, CO concentrations would likely exceed the 1-hour CAAQS.

As previously stated, very conservative assumptions were used to generate the maximum impacts displayed in the table. As a result, these estimates probably overstate actual CO and NO_2 impacts in the study area. The estimates are useful, however, to show that the CAAQS are not likely to be violated. The highest concentrations modeled for each intersection are displayed in Table VIB-4. As illustrated in Table VIB-4,

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33 Consistent with direction from APCD staff, a modeling evaluation was performed at these two intersections to determine worst-case impacts of carbon monoxide (CO) and nitrogen dioxide (NO_2) resulting from vehicular emissions associated with the cumulative plus project scenario. The model year for the EMFAC7PC was 1995, consistent with the URBEMIS3 evaluation.

34 Vehicular emissions for peak-hour traffic volumes were derived using the California Air Resources Board (CARB) EMFAC7PC model. This model provides estimated emission factors based upon an assumed vehicle fleet mix, operating year, ambient temperature and vehicle operating speed. The CARB default fleet mix was used in the analysis. Composite emission factors were derived using this default fleet mix for the operating year 1995..

the CAAQS for CO and NO_2 are not likely to be violated and, since the CAAQS for these pollutants is more stringent than corresponding NAAQS, the latter would not be violated either. Consequently, no significant air quality impacts related to CO hotspots would be anticipated with respect to future intersection performance associated with the proposed project.

TABLE VIB-4
MAXIMUM POLLUTANT CONCENTRATIONS (ppm)
AT SELECTED INTERSECTIONS

Improvement Scenario	Intersection	CO (1-hr)	NO_2 (1-hr)
	CAAQS Threshold	20	0.25
Garden & Salsipuedes Extensions	Carpinteria/Milpas/NB 101 Ramps	17.1	0.08
	Milpas/Indio Muerto/SB 101 Ramps	14.7	0.07
Salsipuedes Extension Only	Carpinteria/Milpas/NB 101 Ramps	17.1	0.08
	Milpas/Indio Muerto/SB 101 Ramps	15.1	0.07

3.4 Consistency with the AQAP

As indicated previously, any project which is found to be inconsistent with the adopted AQAP would be considered to constitute a significant air quality impact. The County has recently adopted the 1991 AQAP, which governs the entire County including the City of Santa Barbara. The primary method for determining consistency with the AQAP for residential projects rests upon comparison of actual population and housing statistics in Santa Barbara with projections used within the AQAP. A document entitled "Forecast 89"[35] was utilized for these projections in the AQAP. However, for commercial projects, the current guidelines indicate that growth tracking mechanisms are currently inadequate for a similar comparison to be made between employment characteristics, commercial space and projections in Forecast '89. Currently, a commercial project is judged to be consistent with the AQAP if it incorporates AQAP Transportation Control Measures (TCM), if it includes applicable stationary source control measures and if the project is consistent with APCD rules and regulations. The City of Santa Barbara recently adopted a Transportation Demand Management Ordinance which would apply to the proposed project and which would require transportation measures consistent with AQAP TCMs. Space heating and kitchen appliances used at the facility should be selected for high efficiency ratings, but the APCD does not usually require stringent source controls on this type of equipment. Lastly, the proposed project would be consistent with APCD rules and regulations, which are generally limited in the area of hotels, hostels and park facilities. Therefore, the proposed project is considered to be consistent with the adopted 1991 AQAP.

4.0 Mitigation Measures

4.1 Short-term Construction Impacts

Significant short-term air quality impacts have been identified in relation to NO_x emissions and dust generation from construction activities which would be associated with the proposed development. The following mitigations would therefore be required:

[35] Santa Barbara County - Cities Area Planning Council, Regional Growth Forecast, April 1989.

4.1.1 NOx Emissions Reduction During Construction

- Equipment engines shall be maintained in good working conditions and in proper tune per manufacturer's specifications.

- During smog season (May through October), construction efforts shall be scaled back in order to reduce quarterly emissions loadings and minimize the number of vehicles and equipment operating at the same time. The form of activity reduction may be activities at a less intense rate each day (fewer employees and equipment), shorter working days, or fewer working days per week. Any of these methods would lengthen the overall construction period.

- Construction activities shall utilize new technologies to control ozone precursor emissions as they become available and feasible. At a minimum, such measures shall include:

  1. Use of reformulated diesel fuel
  2. Two-degree engine timing retard
  3. Installation of high pressure fuel injectors

4.1.2 Control of Fugitive Dust Emissions During Construction

- Dust generated by the development activities shall be retained on-site and kept to a minimum by following the dust control measures listed below. Reclaimed water shall be used whenever possible and available.

  a. During clearing, grading, earth moving or excavation, water trucks or sprinkler systems shall be used in sufficient quantities to prevent dust from leaving the site and to create a crust after each day's activities cease.

  b. After clearing, grading, earth moving or excavation is completed, the disturbed area must be treated by watering; <u>or</u> by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.

  c. During Construction, water trucks or sprinkler systems are to be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this will include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency will be required whenever the wind speed exceeds 15 mph.

- Stockpiling of Fill Material:

  Soil stockpiled for more than two days shall be covered, kept moist or treated with soil binders to prevent dust generation.

- Activation of Increased Dust Control Measures:

  The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for finish grading of the structure. In addition, the Santa Barbara Arts and Crafts Show shall be provided the name and number of the designated dust control program monitor, which will enable show director(s) to make contact in the event dust control becomes a

problem.

- Recordation of Mitigation Measures:

  Prior to land use clearance, the applicant shall include, as a note on a separate informational sheet to be recorded with map, these dust control requirements. All requirements shall be shown on grading and building plans.

4.2 Long-Term Impacts

The proposed project would have long-term operational impacts of a significant level. The following mitigation measures would be required.

- Prepare a Transportation Systems Management Plan to encourage alternate transportation modes. The Plan shall include incentives and disincentives to the single occupant auto and shall provide for a Alternative Transportation Coordinator. Showers, lockers and changing rooms shall be provided for hotel employees who use alternative modes of transportation. Quarterly and yearly monitoring reports shall be required to ensure program effectiveness and to provide an appropriate enforcement mechanism.

- The City, in cooperation with the applicant, shall be involved in the dissemination of educational information on avoiding trips and use of all alternative modes of transportation (e.g., biking, walking and public transit) along with a carpool/vanpool matching and promotion program for the project life.

- Include design features to reduce stationary source emissions. Use building materials that produce less emissions such as water-based paints, bricks, stone and concrete (instead of asphalt) for parking lots. Building orientation should take advantage of natural heating and cooling patterns; plant deciduous shade trees which allow sunshine in the winter and shade in the summer; light-colored roofing, energy-efficient appliances, lighting and temperature controls and window treatments are recommended to reduce energy consumption.

- APCD does not have offset or mitigation plans available at this time. However, the City believes it is important to reduce air quality impacts to the degree possible and shall work with the applicant to develop appropriate offsets or mitigation prior to the Certificate of Occupancy.

APCD staff additionally recommend the following:

- APCD requests the opportunity to review the design of the project in the application submitted to the City. APCD review of the proposed development plan should be done early in the process. The project shall participate in any offset program which has been developed and adopted by the APCD or City prior to issuance of certificates of occupancy.

5.0 Residual Impacts

Incorporation of the above mitigation measures would reduce construction related NOx emissions to the maximum extent which is feasible. **However, the residual level of short-term construction-related NO_x impacts would remain significant and unavoidable.** The above mitigation measures would not be

sufficient to reduce short-term dust impacts to acceptable levels. **Therefore, while incorporation of the above mitigations would lessen short-term dust impacts to the extent which is feasible, the residual impact would remain significant and unavoidable.**

Also, incorporation of the above referenced mitigations would reduce long-term air quality impacts to the extent which is available. However, these measures would not be sufficient to reduce levels below significance unless the City creates a substantial offset mitigation program, as is required by mitigation measures above. At the present time, there are no additional mitigations which have been reviewed and accepted by APCD staff to assure quantifiable reductions in long-term project emissions. Since the City's mitigation program has not been developed yet, its effectiveness is uncertain. **Therefore, the residual level of long-term ROC and NO_x impacts would remain significant and unavoidable.**

C. ARCHAEOLOGICAL RESOURCES

1.0 Background and Setting

This section is based on two reports prepared by Larry R. Wilcoxon and Charles D. Locke. The first report entitled "Results of a Phase 2 Archaeological Subsurface Testing Program at the 'Shore Acres' Locality Within the Proposed Waterfront Park and Hotel Project Site" was prepared January 11, 1993. The second report entitled "A Phase 1 Prehistoric and Historic Archaeological Resource Evaluation for the Proposed Extension of South Salsipuedes Street in Santa Barbara, California" was prepared February 27, 1993. The following analysis describes the results of the extensive Phase 2 archaeological survey (conducted on the park and hotel site), as well as the less extensive Phase 1 archaeological survey (conducted within the Salsipuedes Street extension area).

1.1 Park and Hotel Site

The Phase 2 Shore Acres Report describes the results of a Phase 2 archaeological resource evaluation for a limited portion of the proposed Santa Barbara Waterfront Park and Hotel project. A previous Extended Phase 1 archaeological backhoe testing program conducted for 10.17 acres of the project site in conjunction with the proposed "Fiesta Park" project identified a subsurface archaeological deposit within the southeastern corner of the project area. Given the context and cultural materials uncovered, this deposit was thought to be potentially associated with Shore Acres, a historic seaside resort community that once occupied a portion of the parcel from 1909 until about 1920.[36]

The footprint for the proposed hotel and parking garage partially overlay the 2,960 square meter archaeological deposit delimited during the previous Extended Phase 1 cultural resource investigation.

In depth archival research and archaeological field work were undertaken to understand the nature of past land use and to identify the likely locations of both historic and prehistoric archaeological resources. Initially, much of the project area was situated within a seasonally inundated marsh or estero area that served as an unofficial city dump.[37] Subsequently, the project area became developed through both recreational, commercial and industrial uses. In 1886, the project area was part of a larger fairground and racetrack development established in the estero basin by the Santa Barbara Land and Improvement Company.[38]

In 1909, James L. Barker subdivided and developed the southeastern portion of the project area into a seasonal resort community known as the "Shore Acres." Barker built a number of small, wood-frame and thatch-covered cottages within his tract. These cottages were furnished and rented to tourists.

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36 "Results of an Archaeological Backhoe Testing Program for the Proposed Fiesta Park Project", by Larry R. Wilcoxon, 1987.

37 History of Santa Barbara County, State of California, Its People and Its Resources, by Owen H. O'Neill, 1939.

38 "Constructing a Racetrack Here in 1888", *Santa Barbara News-Press*, by Stella Rouse, 1981.

1.2 Salsipuedes Street Extension

The Archaeological Phase 1 Salsipuedes Street Extension Report describes the results of a Phase 1 archaeological resource evaluation for the proposed extension of the South Salsipuedes Street alignment between Cabrillo Boulevard and the southern terminus of the original Salsipuedes Street below Quinientos Street in Santa Barbara, California. The proposed street extension, which is part of the proposed Waterfront Park and Hotel Project development, starts where South Salsipuedes Street intersects Cabrillo Boulevard and proceeds northward across the Southern Pacific Railroad tracks, curves northwestward through the Lash Construction storage yard, and meets the existing terminus of Salsipuedes Street south of the Quinientos Street intersection. The proposed street project will include an 84 foot wide street corridor extending for a distance of approximately 900 feet. South of the railroad right-of-way, street improvements are to include four traffic lanes separated by a median divider, two bicycle lanes, two sidewalks, and an adjustment to an existing catch basin within the street south of the Southern Pacific Railroad tracks. Proposed improvements north of the railroad easement include two traffic lanes, two bicycle lanes, and two sidewalks.

The proposed street corridor traverses an area of possible prehistoric and historic archaeological sensitivity as defined by the cultural resource sensitivity map prepared as part of the Cultural Resources Section of the City of Santa Barbara's Master Environmental Assessment. Previous studies prepared for the adjacent Fiesta Park/Waterfront Park developments have identified two potentially significant historic archaeological resources. These include historic deposits associated with the thatched cottage area of Shore Acres (1909 to ca. 1920) and the remains of the southern loop of the Estero Racetrack (1887-1903) (Wilcoxon 1987; PHR Associates and Wilcoxon 1987). Recent testing at the Shore Acres site has confirmed that the cultural material encountered during a 1987 backhoe test program was associated with more recent landfill material deposited on the vacant Waterfront property, not cultural deposits associated with the former Shore Acres resort community (Wilcoxon 1993).

As mentioned above, the Salsipuedes Street extension area remained undeveloped until 1886, at which time development of a race track and fairgrounds occurred in this area. In addition, the eastern portion of the Shore Acres development, which was constructed by James L. Barker in 1909, was situated in the southern portion of the project area. The construction of the current alignment of South Salsipuedes Street between Cabrillo Boulevard and the Southern Pacific Railroad tracks in the early 1980s cut through the former Shore Acres site. Recent excavations conducted within the portion of the Shore Acres site at the eastern end of the Waterfront Park and Hotel project site failed to identify any cultural deposits associated with the former resort community (Wilcoxon 1993).

2.0 Research Procedures

2.1 Objectives of the Present Study

2.1.1 Park and Hotel Site

The objectives of the Phase II investigation were to confirm the affiliation between the archaeological deposit and the former Shore Acres development, determine the age, integrity and significance of the cultural materials encountered, evaluate any direct and indirect project impacts on the identified cultural

resource, and formulate appropriate mitigation recommendations.[39]

To address the issue of cultural resource significance or uniqueness, a sufficient amount of information was collected directly from the resource itself to characterize the range of past human behavior represented and to determine the spatial integrity of associated artifacts, features and ecofacts.

To guide the archaeological data collection efforts of the present study, the field work and subsequent analysis were directed specifically to address the following question regarding the portions of the former Shore Acres locality to be affected by the proposed development:

> *Does the organic plant deposit identified during the previous archaeological excavation unequivocally represent the Shore Acres thatched cottage subdivision or does it represent natural marsh plant growth that is overlain by or included within more recent fill soils?*

During the field investigation, a special effort was made to recover definitive time-sensitive artifacts for the occupation period 1909-ca. 1920. An analysis of *in situ* plant material was also undertaken by Wayne R. Ferren, a professional botanist, to evaluate the nature of the plant material and its context of discovery.

2.1.1 Salsipuedes Street Extension

The objective of this Phase 1 cultural resource evaluation is to assess whether or not potentially significant prehistoric or historic archaeological resources are, or may be, present within the area of concern and to develop appropriate management recommendations. The scope of work for this investigation included: a) a resource records search of existing archaeological documents pertaining to the project area and immediate environs, b) an intensive archaeological field survey to locate, describe and determine the spatial extent of any potentially significant archaeological resources, c) an assessment of project impacts on any potentially significant archaeological resources encountered, and d) the formulation of appropriate management recommendations. The field work and background research were carried out by a team of archaeologists under the direction of Larry R. Wilcoxon between February 22, 1993 and March 10, 1993.

2.2 Field Procedures

2.2.1 Park and Hotel Site

Archaeological excavations at the Shore Acres locality were planned and executed so as to provide the data necessary to evaluate the cultural deposits within the proposed impact area. The first 2.25 X 2.25 meter excavation block was established adjacent to the south side of the east end of Trench 4. Prior to its excavation, the fill overburden was removed with a mechanical backhoe to within 5-10 cm of the surface of the projected thatch stratum. The excavation block was subdivided into four contiguous 1.0 X 1.0 meter quadrants separated by a 25 cm wide unexcavated balk, or wall comprised of soil. The balk between each unit was left to provide stratigraphic control between adjacent excavation units. Two diagonally opposing excavation units, designated Units 1 and 2, were located in the northwest and southeast quadrants of the

[39] Under Section 21083.2 of the California Public Resources Code, a development project can only have a significant effect on "unique archaeological resources." A unique archaeological resource is defined to mean *"an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) contains information needed to answer important scientific research questions and that there is a demonstrative public interest in that information; 2) has a special and particular quality such as oldest of its type or best available example of its type; 3) is directly associated with a scientifically recognized important prehistoric or historic event or person."* A non-unique archaeological resource is an artifact, object, or site that does not meet at least one of these criteria.

western block. The excavation of the northwestern and southeastern 1.0 X 1.0 meter excavation units (Units 1 and 2) was accomplished with hand tools in either 10 centimeter thick arbitrary levels or by natural strata.

During the excavation all vertical measurements were made from the adjacent natural ground surface. Each unit was excavated to culturally sterile subsoil. Detailed notes were kept on excavation procedures, the stratigraphic relationship between soils and artifacts observed, the nature of the soil horizons, and changes in artifact and ecofact densities. Soils were described using a standardized soil texture test and Munsell color readings. Photographs were taken of each excavation unit.

As a result of not being able to locate well preserved remnants of the previously exposed thatch stratum in either Trenches 2 and 4, or in Units 1 and 2, the excavation strategy was slightly modified in order to locate additional deposits containing well preserved plant material. An exploratory trench, designated Trench 24, was excavated eastward from the southeast corner of the western excavation block. A 4 cm thick layer of well preserved plant material was discovered approximately 20.8 meters east of the southeast corner of the western excavation block. A second excavation block was established southeast of the east end of Trench 24. An 80 cm wide balk was left between the east end of Trench 24 and the northwest quadrant of the second excavation block. The backhoe operator carefully removed 25 to 50 cm of fill overburden above the surface of the plant-bearing stratum. Units 3, 4 and 5 were established in the northeast, southwest and northwest quadrants of the second block and excavated and field processed in a manner similar to that described for Units 1 and 2.

2.2.2 Salsipuedes Street Extension

Once the background research was completed, an intensive archaeological field survey was conducted over all exposed land surfaces within the proposed street extension corridor. The field survey was designed to locate surface evidence of any potentially significant archaeological resources that may be adversely impacted by proposed construction. All exposed ground surfaces within the corridor were systematically surveyed by walking parallel transects spaced at intervals of five meters or less. Where surface visibility was impaired by the presence of landscaping or shallow overburden, a shovel was used to expose the natural ground surface in shallow divots. Each shovel divot was approximately 15 to 25 centimeters deep. Shovel divots were made systematically every ten meters along survey transects in areas not covered by asphalt and concrete.

The accuracy of any archaeological field reconnaissance rests heavily upon the relative disturbance of the area being investigated and/or the amount of material (structures, imported soils, paving, vegetation, etc.) covering the original ground surface. Structures, paved surfaces and land and railroad fill cover most of the ground surface within the proposed street extension corridor. However, soils made visible in landscaped areas, excavated archaeological trenches, exposed banks and shovel divots provided good soil exposures within or immediately adjacent to the proposed street corridor. In areas of dense vegetation, walkways and/or gravel, shovel tests were of sufficient density to assure accurate survey results.

2.3 Laboratory and Data Processing Procedures

All materials collected in the field were transported to the laboratory where they were sorted and cataloged. Unmodified materials such as naturally occurring gravels were discarded after careful examination.[40] Materials of cultural origin were divided into basic classes corresponding to shell, bone, organic, charcoal and historic artifact categories. The artifacts and ecofacts were cataloged according to type and material, while non-artifactual bone remains were divided into broad taxonomic levels. The frequency and weight of each classificatory grouping were quantified and entered into a computerized archaeological cataloging system.

3.0 Research Results

The research results consist of several categories of data, including the specific types and distribution of cultural remains, their relation to soil stratigraphy and the past human activities that can be inferred from these data. This section summarizes the results of the field investigation.

3.1 Park and Hotel

3.1.1 Stratigraphy and Soil Characteristics

An investigation of on-site stratigraphy indicated that the entire project site is buried by fill that is non-native to the property. In nearly every exposure, the fill material was found to contain historic cultural material such as brick, glass, metal, plastic, milled wood or decayed clothing. In all cases, the lower contact of each fill unit is abrupt.

Dr. Thomas Rockwell, a soils geomorphologist, characterized soils within the project area during the Extended Phase I excavation program (Wilcoxon 1987). He classified natural deposits within the project area into principally four types. These included: 1) grayish white sand of probable beach origin, 2) purplish gray garnetiferous sand of probable slough origin, 3) stratified sandy and clayey deposits of probable slough origin with a beach component and 4) massive, organic rich clay of definite slough origin. Each soil unit is described briefly as to its character and probable origin.

3.1.2 Description of Soils Within Excavation Units

Units 1 and 2 located in the western excavation block and Units 3, 4 and 5, as well as the balk unit located in the eastern excavation block all encountered soils consistent with those described by Rockwell during the previous investigation. Each excavation unit contained approximately 80 cm of fill soil which was deposited on the surface of a very distinct purplish gray well-sorted sand (slough sand). The contact between the fill and the underlying slough sand was flat and abrupt. The purplish gray slough sand appears to be consistent in color and texture between 80 and 130 cm below surface. At a depth of approximately 130 cm, the purplish gray slough sand grades into a white sand which is consistent with the description of beach sand described during the previous investigation.

The stratum of well preserved plant material exposed in Units 3, 5, and the balk unit of the eastern excavation block was encountered at varying depths between 25 and 57 cm below surface. Approximately 25 to 37 cm of fill soil was exposed beneath the plant-bearing stratum. An *in situ* examination of the plant-

[40] In an effort to reduce the amount of time required to sort through the recovered material and minimize the level of data redundancy, only screen residue constituents equal to or greater than 1/4-inch in maximum dimension were processed for cataloging and analysis.

bearing stratum by the project botanist resulted in the identification of Giant Reed (*Arundo donax*), Cattail (*Typha* sp.) and a strip of bark apparently from a tree or shrub. The reed and cattail are common aquatic plants native to wetland habitats of coastal Santa Barbara County and are usually located in the margin areas of coastal wetlands. Based on the field observations, it was concluded that the buried plant material represents what was a stand of native aquatic plants that apparently were growing in a wetland or gathered as debris along the shore of a wetland located behind the beach or along the road that now is Cabrillo Boulevard. Because there was no flowering material of any of these genera and because there was such a mixture of plant material, it was surmised that the plants were buried during a disturbance event, perhaps caused by human activities.

3.1.3 Vertical Distribution of Cultural Materials

Cultural materials recovered during the current investigation include a combination of construction and industrial debris (brick, concrete, road asphalt, wire, nails, window glass and milled lumber), personal items (ceramic cups and plates, clothing, shoe parts), food residues (shellfish and bones) and consumption product containers and packaging (beverage bottles, plastic bags, styrofoam cups). These materials are associated with the 80 cm of fill soil which covers the surface of the entire site. The plant-bearing stratum appears to represent a discrete episode of dumping which took place during the time the fill was imported to the site. A Budweiser Beer bottle was recovered from within the lower portion of the plant-bearing stratum. The bottle was sealed with a "twist-off" cap which was not introduced for use with beverage containers until after 1976 (Personal Communications, December 21, 1992, Mr. Jim Woodcock, Public Relations Representative, Anheuser Busch Company, St. Louis, Missouri).

Trace amounts of historic debris were recovered from the upper levels of the slough sand. This material appears to be intrusive into the slough sand deposit and was probably introduced as a result of the mixing of the fill and sand strata through bioturbation.

3.2 Salsipuedes Street Extension

The cultural resource investigation conducted for the proposed South Salsipuedes Street extension corridor did not identify any potentially significant prehistoric or historic cultural resources. Inspection of existing landscaped and open ground surfaces as well as subsurface soils exposed in shovel divots and previously excavated archaeological trenches did not reveal any artifacts or faunal remains dating before A.D. 1950.

4.0 Project Impacts

4.1 Park and Hotel Site

The well preserved plant material identified during the present program of archaeological excavation was carefully examined to determine whether the plant material is associated with the former Shore Acres thatched cottage subdivision or represents the naturally occurring marsh plant species that have been overlain by or included within more recent fill soils deposited within the project area. The plant material includes large quantities of cattail and marsh reed which are naturally occurring species that would have been present along the shores of the nearby estero. The stratigraphy revealed in the north sidewall of the balk unit clearly indicates that the plant-bearing stratum represents material that has been dumped on the vacant property and is not a cultural deposit associated with the Shore Acres development. The cultural deposits that do occur within the project area are associated with both the over and underlying fill soils. All artifacts and faunal remains that are present within these soils appear to date from the mid-to-late 20th

century and occur in highly disturbed contexts.

The California Environmental Quality Act (CEQA) of 1970 sets forth some basic policies for environmental protection with regard to Cultural Resources. The text of CEQA and subsequent amendments and implementation guidelines include cultural resources and areas of historic importance as part of the environment. Compliance with the legal directives and guidelines of CEQA necessitates evaluating the relative value or significance of cultural resources. The value of a resource is central to management decisions regarding resource disposition. If a property is of no importance or lacks significance, it need not be preserved or its damage mitigated.

With respect to archaeological resources, Public Resources Code Section 21083.2. requires a lead agency to make a determination of 1) whether a project will have a significant effect on archaeological resources and 2) whether such resources are "unique" under the law. If a proposed project will adversely affect a unique archaeological resource, alternatives must be considered. In addition to CEQA mandates, the City Landmarks Committee has criteria for evaluating any structure, natural feature, site or area for landmark designation.

The archaeological deposits associated with the Shore Acres locality contain cultural materials in highly disturbed fill contexts. These materials generally date from the mid-to-late 20th century and include a combination of construction and industrial debris, personal items, food residues, consumption product containers and packaging, and landscape clippings. The nature and context of this variable cultural assemblage suggests that the deposits were randomly dumped on the vacant low-lying Waterfront parcel over time and periodically reworked and incorporated into the existing landfill. The lack of association between cultural materials and specific household, recreational or commercial enterprises considerably diminishes their interpretive potential. Their association with such a recent time period (less than 50 years) also detracts from their importance and minimizes their archaeological and historical significance.

The Phase 2 archaeological evaluation of the Shore Acres Locality did not identify any potentially significant prehistoric or historic period cultural resources. Therefore, the construction of the luxury hotel and subterranean parking garage will not result in direct adverse impacts to any known cultural resources within the locality tested.

4.2 Salsipuedes Street Extension

As noted above in the background and setting section, the segment of the street corridor from Cabrillo Boulevard to the Southern Pacific Railroad easement passes through the former Shore Acres site. Since this area has been previously disturbed by street construction in the early 1980s and the present project calls for minimal grading in this portion of the corridor, it is anticipated that no potentially significant cultural resources associated with this site will be impacted by the current project. Given the findings of the background research and field survey, it is anticipated that the construction of the Salsipuedes Street extension would not result in direct or indirect adverse impacts to any known cultural resources within the locality surveyed.

5.0 Mitigation Measures

5.1 Park, Hotel and Sites

Given the unknown nature of archaeological resources, the following mitigation measure is required by the Initial Study prepared on the proposed project.

- The Owner shall submit a signed contract or other acceptable evidence of completion of the following to the Division of Land Use Controls prior to issuance of any Building or Grading Permit:

  A qualified archaeologist shall be present during all ground disturbing activity associated with the proposed project, including but not limited to, grading, excavation, brush removal and ground clearance, demolition of buildings and removal of pavement. In the event that prehistoric or historic features, artifacts or other remains are encountered, all work in the area of the find shall be halted until the nature and significance of the find can be determined and the Environmental Analyst shall be notified. If the findings are potentially significant, a Phase 3 recovery program shall be prepared and accepted by the Environmental Analyst and the Landmarks Committee. That portion of the Phase 3 program which requires work on-site shall be completed prior to continuing construction in the affected area. If prehistoric or other Native American remains are encountered, a Native American representative shall be contacted and shall remain present during all further subsurface disturbance in the area of the find. A final report on the results of the archaeological monitoring shall be submitted to the Environmental Analyst within 180 days of completion of the monitoring and prior to the issuance of the Certificate of Occupancy.

5.2 Salsipuedes Street Extension

Given that no significant or adverse impacts to cultural resources are anticipated within this portion of the project site, no mitigation measures are required or recommended and the development should be allowed to proceed without further cultural resource restrictions.

However, because archaeological resources are never fully predictable by surface reconnaissance, there is always a remote possibility of uncovering subsurface features or artifacts associated with past human occupation and/or use of the project area. For this reason, the following mitigation measure is recommended.

- Contractors and construction personnel should be alerted to the remote possibility of encountering subsurface cultural resources within the project area. If such resources are encountered or suspected, work should be halted immediately, and a professional archaeologist consulted. The latter shall be employed to assess the nature of any discoveries and develop appropriate management recommendations for archaeological resource treatment.

6.0 Residual Impacts

No residual impacts to archaeological resources are anticipated to result, given incorporation of the recommended mitigation measure described above.

D. HISTORIC RESOURCES

The following section summarizes a historic resources report prepared for the proposed park and hotel site in December of 1992, by Rebecca Conard. This report is contained in its entirety within Appendix F of this EIR. Because no historic resources exist within the proposed hostel site, an analysis of the hostel site's historic resources is not warranted. Therefore, the following section will not discuss historical resources associated with the proposed hostel site.

1.0 Environmental Setting

The 13-acre site proposed for development as Santa Barbara Waterfront Park and Hotel is situated in a part of the City historically referred to as the estero, a marshy area that was under water at least part of the year. Since the 1880s, the character of the Waterfront has been shaped by a mix of recreational, commercial-industrial and residential land uses. It is a mixture that many consider to have given Santa Barbara's Waterfront a distinctive character. All three uses have been present in the project area.

Within the project parcel there is one extant historic property, the old City pump and screen plant, constructed in 1924. This building is not listed on the National Register of Historic Places. Likewise, it has not been designated a State Landmark or a Santa Barbara Landmark or a Santa Barbara Structure of Merit. Criteria for establishing historic resource significance under the National Register of Historic Places and the City Landmark's Committee guidelines are presented below.

The former pump and screen plant, located at 321 E. Cabrillo Street, was erected on land acquired for the City of Santa Barbara by the East Boulevard Improvement Association in 1924. The association, also known as the David Gray Committee, bought several Waterfront parcels in 1924 as part of a land acquisition effort instigated to prevent outdoor advertising and commercial development along the boulevard. L. R. Walker of the City Engineer's office designed the plant in the Spanish Colonial Revival style, a style in keeping with a citizen-inspired movement to establish a unified Hispanic architectural image for Santa Barbara.[41]

From 1924 to 1962, the facility was used to treat city sewage before releasing the wastewater into the ocean. After Santa Barbara built a new wastewater treatment facility north of the railroad tracks and abandoned the plant, the building was leased to private groups and businesses for about a decade. From 1972 to 1974, the City Parks Department used the building for storing equipment. Beginning in 1974, the City leased the building to artists, who used it as studio space. From 1983 on, the City Waterfront Department offices have been located here.

The old pump and screen plant is a one-story, L-shaped building with a red tiled gable roof. It is built of hollow-block concrete with stucco-finished walls. The main building block measures approximately 30'x 48' with a 15'x 17' extension on the southwest corner. A 10'x 12' addition, construction date undetermined, extends from the south side. This addition has brick walls and is covered by a red-tiled shed roof; three segmentally arched openings on the addition have been infilled. Window and door openings elsewhere are deeply recessed. Three or four older wood-frame windows remain intact, and presumably these are original features. Half-a-dozen wall patches reveal where other openings have been closed. The size and placement of these patches indicate that some of them were for doors and windows; others probably accommodated

[41] Elevations of Pump and Screen Plant for outfall Sewer, City of Santa Barbara, 1924.

plant equipment extending from the building. Asphalt parking areas lay adjacent to the building on the west and north sides, while mature landscaping encompasses the building and parking areas.

Other historic properties once located within the bounds of the project parcel include a portion of the Estero Racetrack, the Puritan Ice Company Plant, a railroad spur and a portion of the Shore Acres tourist accommodations. No visible evidence of these properties remains.

In addition, Caltrans, in its recently completed Draft EIR/EIS for the proposed widening of U.S. Highway 101 between Milpas Street and the City of Capinteria completed cultural resource studies that indicate that the series of parks and parkways owned by the City along Cabrillo Boulevard between U.S. Highway 101 and State Street are eligible for acceptance on the National Register of Historic Places as the East Cabrillo Boulevard Parkway District. The park and hotel site includes a portion of the designated parkway area between Salsipuedes and Santa Barbara Streets.

1.1 Applicable Thresholds

The Santa Barbara Master Environmental Assessment requires that historic resources be evaluated for significance under National Register of Historic Places criteria in addition to City of Santa Barbara criteria for Landmark or Structure of Merit designation. Therefore, the criteria for both the National Register of Historic Places and the Landmark or Structure of Merit designation is provided below.

1.1.1 National Register of Historic Places

The National Historic Preservation Act of 1966 established the following criteria for eligibility to be accepted to the National Register of Historic Places. As articulated at 36 CFR Section 60.6, these criteria are stated as follows:

> The quality of significance in American history is present in districts, sites, buildings, structures and objects of state and local importance that are at least 50 years old, possess integrity of location, design, setting, materials, workmanship, feeling, and association, and
>
> - that are associated with events that have made a significant contribution to the broad patterns of our history; or
> - that are associated with the lives of persons significant in our past; or
> - that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
> - that have yielded or are likely to yield information important in prehistory or history.

1.1.2 City of Santa Barbara Landmarks or Structure of Merit

In 1977, the City of Santa Barbara adopted Ordinance 3900 creating a permanent Landmarks Committee and establishing criteria for the designation of City Landmarks and Structures of Merit. City Code Section 22.22.040 specifies that in considering a proposal to recommend to the City Council any structure, natural feature, site or area for designation as a landmark, the Landmarks Committee shall apply any or all of the

following criteria:

- its character, interest, or value as a significant part of the heritage of the City, the State, or the Nation;
- its location as the site of a significant historic event;
- its identification with a person or persons who significantly contributed to the culture and development of the City, the State, or the Nation;
- its exemplification of a particular architectural style or way of life important to the City, the State, or the Nation;
- its exemplification of the best remaining architectural type in a neighborhood;
- its identification as the creation, design, or work of a person or persons whose effort has significantly influenced the heritage of the City, the State, or the Nation;
- its embodiment of elements demonstrating outstanding attention to architectural design, detail, materials, or craftsmanship;
- its relationship to any other landmark if its preservation is essential to the integrity of that landmark;
- its unique location or singular physical characteristic representing an established and familiar visual feature of a neighborhood;
- its potential to yield significant information of archaeological interest; or,
- its integrity as a natural environment that strongly contributes to the well-being of the people of the City, the State, or the Nation.

The Landmarks Committee may designate as a Structure of Merit any structure not designated as a landmark but deserving official recognition as having historic, architectural, archaeological, cultural or aesthetic significance.

The old City pump and screen plant building meets two of the above City Landmarks criteria, which are as follows: 1) its character, interest, or value as a significant part of the heritage of the City, the State, or the Nation; and, 2) its exemplification of a particular architectural style or way of life important to the City, the State, or the Nation. The building exemplifies a particular architectural style that has been important to Santa Barbara since the 1920s. It is also an integral feature of a group of buildings throughout the City that exemplify a local movement that is important in the history of American City planning. During the 1920s, private citizens, working mainly through the Community Arts Association, spearheaded a major effort to influence the construction of Hispanic-style buildings throughout the City. The Santa Barbara effort is considered to be an important case study in the history of American city planning. Santa Barbara was the first U.S. city to establish an Architectural Board of Review, and it was among the first

communities to "press for a uniform architectural expression."[42]

Alterations that have compromised the old pump and screen building's historic integrity are deemed sufficient to render the property ineligible for the National Register in its current condition. Although integrity of location and setting remain intact, modifications include the shed addition on the south side, openings that have been altered or closed and the removal of interior equipment associated with the building's original function as a wastewater treatment plant. On the east facade, two of three window openings have been closed and the remaining window appears to be a replacement. In addition, a vent in the gable peak has been bricked in. On the north facade, only two original windows remain intact; another window has been closed and a fourth has been replaced by a door opening. In addition, a door on the west side has been closed and double doors on the east end have been replaced by a large overhead door. On the west facade, one original window remains; another has been closed and a third has been replaced with a window of a different size. In addition, a vent in the gable end has been covered. On the south facade, one original window may remain. Two sets of double doors have been removed, one window has been closed, and two windows appear to have been removed as part of constructing the brick addition. In addition, one new window opening has been cut into the south wall of the 15' x 17' ell.

The integrity of the original design, materials and workmanship have suffered as a result of previous exterior alterations. However, despite these changes, the original plan remains obvious and some changes appear to be reversible.

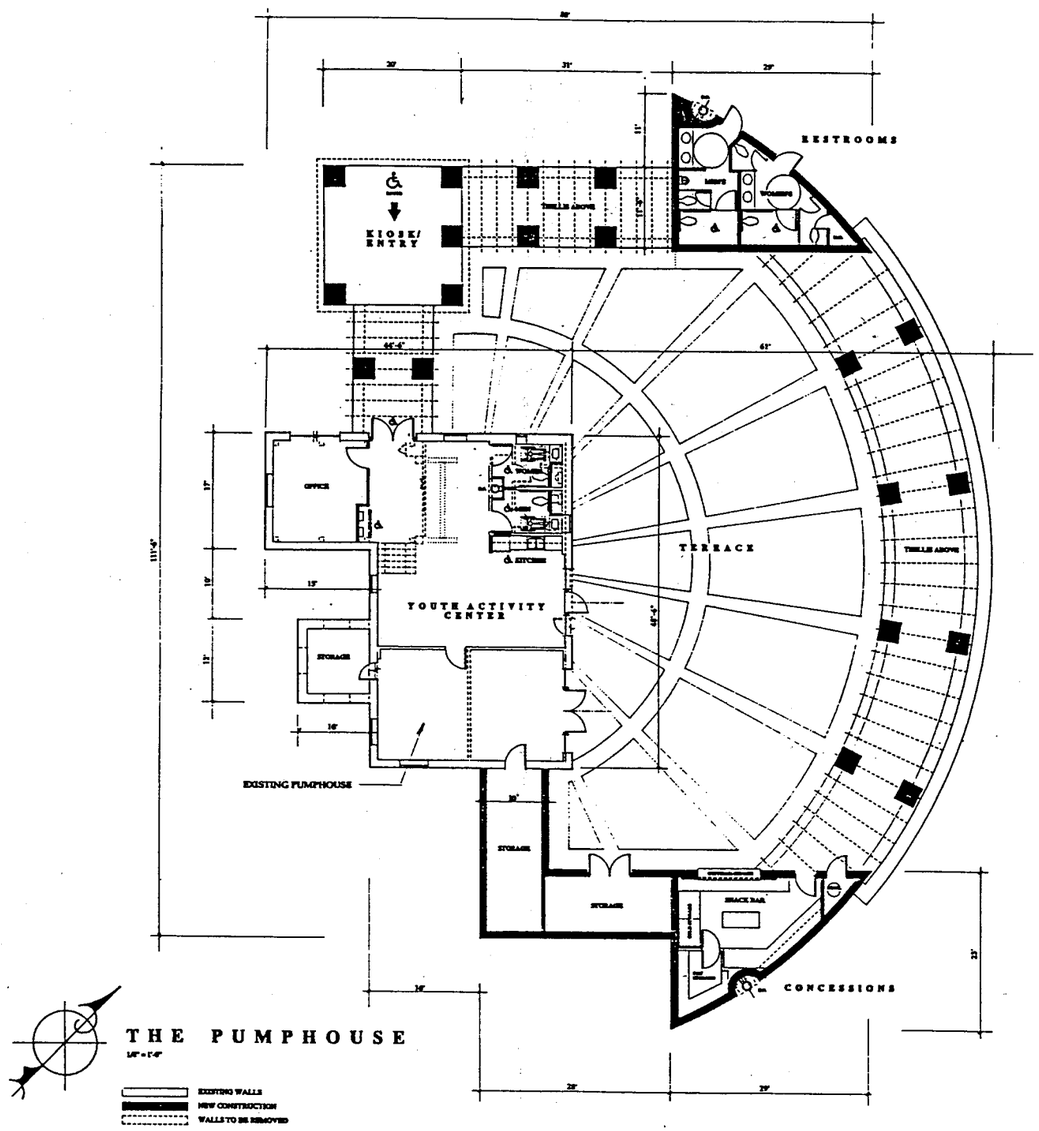
2.0 Impact Analysis

Development of the proposed park portion of the site would entail the incorporation of the old City pump and screen plant (proposed pump house) into the design of the park portion of the site. The old pump and screen plant would be converted and used as a Recreation Center. Based on conceptual architectural drawings for the pump house, dated June 15, 1992 and revised August 20, 1992, the building will anchor a facility that includes covered walkways, an entry kiosk, freestanding public restrooms, storage areas and a small concession building (refer to Figure VID-1). Overall the proposed pump house, which incorporates open-air spaces with enclosed and covered spaces, would occupy an area approximately 120' x 100'.

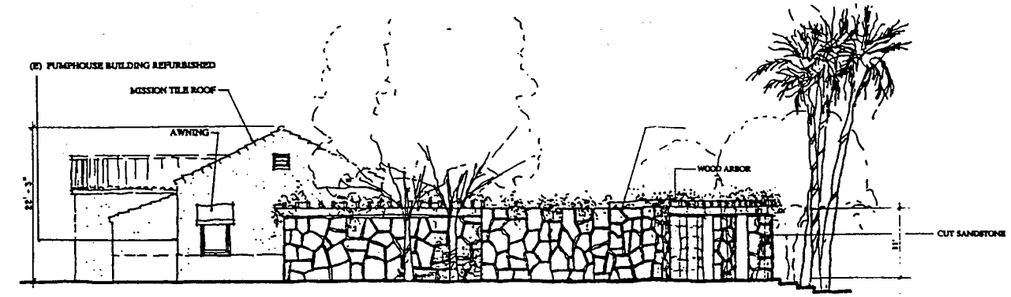
2.1 Initial Study Concerns

According to the initial study prepared by the City's Community Development Department and based on an analysis contained in the Fiesta Park EIR, the old City pump and screen plant is an architecturally significant building that has the potential to be adversely impacted by the proposed park portion of the site. Potential impacts would be associated with additions to the northwesterly and southeasterly sides of the structure, which may result in a degradation of the building's architectural integrity.

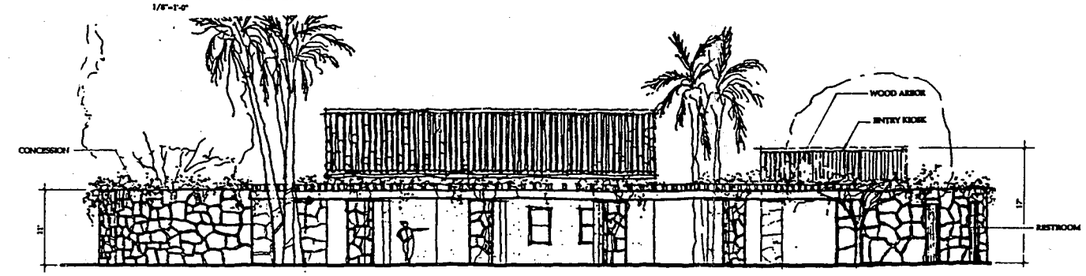
[42] Gebhard, 1982:9.



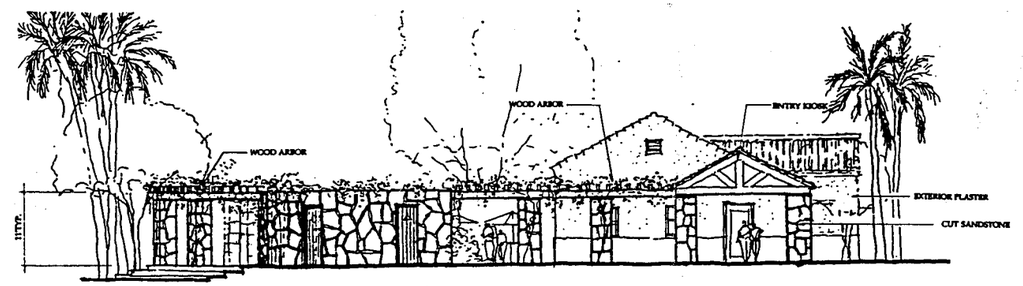
THE PUMPHOUSE



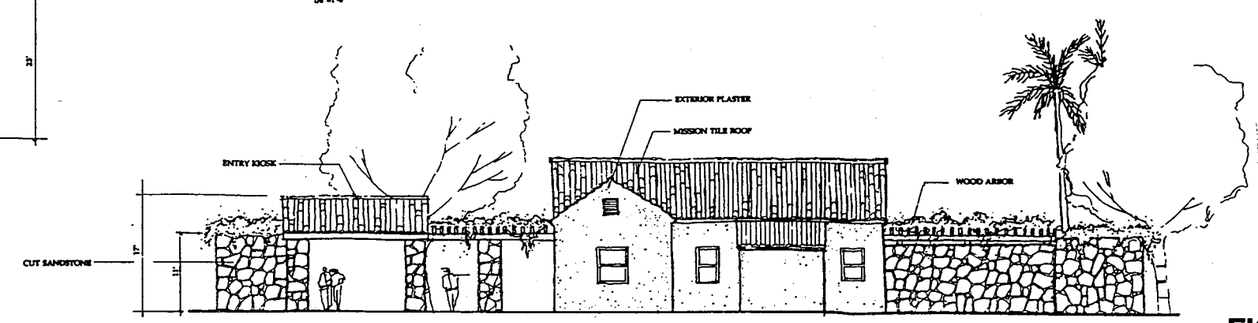
EAST ELEVATION



NORTH ELEVATION



WEST ELEVATION



SOUTH ELEVATION

FIGURE VID-1

PROPOSED PUMPHOUSE ELEVATIONS

SOURCE: George W. Girvin Associates

INTERFACE

The proposed pump house design preserves the overall original design of the old pump and screen plant, although on the east, north and west facades the lines of the building would be obscured by the addition of sandstone walls and piers, as well as wood arbors. On the south facade, which faces Cabrillo Boulevard, the lines of the building would remain as they are now. In addition, the pump and screen plant walls would remain stucco, thereby contrasting with the proposed sandstone walls of new additions, providing a clear distinction between the historic building and new construction. The red tile mission roofing would remain on the proposed pump house and would be echoed by a red tile roof on the entry kiosk, which would be located on the west side of the original pump and screen plant.

Therefore, the conceptual format of the proposed pump house would preserve the essential design features of the old pump and screen plant, as determined by City Landmarks criteria. Because the essential design features of the pump and screen plant would be preserved, proposed additions would not result in a significant adverse impact to on-site historic resources. However, because of the lack of detail depicted on the conceptual architectural drawings for the proposed pump house, as well as the historical nature of the building, finalized design details would be subject to Landmarks Committee review.

2.1.2 Historical Parkway

In response to the proposed widening of the U.S. Highway 101 between Bailard Avenue in Carpinteria and Milpas Street in Santa Barbara, the California Department of Transportation (CALTRANS) staff historians and architects evaluated historic resources that could be potentially affected by the widening. The study of affected historical resources is known as the California Department of Transportation Historical Resources Evaluation Report for the Carpinteria- Santa Barbara median widening and Interchange Project, May, 1992. Most of the resources identified within the "Area of Potential Effect" (APE) include buildings which pre-date 1945 and which have not been altered or moved. Of the resources evaluated for their historical significance, Cabrillo Boulevard between Channel Drive and Santa Barbara Street met the criteria of eligibility for inclusion in the National Register of Historic Places. This stretch of roadway has therefore been recognized as an area of local historic importance and named the East Cabrillo Boulevard Parkway Historic District. This roadway is recognized for its association with the City's involvement in the early stages of the city planning movement in America during the 1920's and as a good example of Olmstead Brother's work as landscape planners. The period of significance for the East Cabrillo Boulevard Parkway Historic District is 1924-1930.

Due to the historic significance of Cabrillo Boulevard, any project that is proposed along Cabrillo Boulevard is evaluated for its effect on the Historic Parkway. In this regard, the Waterfront Park and Hotel project would not affect the East Cabrillo Boulevard Parkway Historic District. In fact, with the implementation of the Park component, the Historic Parkway would be enhanced in the project area with the added landscaping. The landscaping for the park and hotel components of the project would complement the existing landscaping along Cabrillo Boulevard. Prior to approval of the project, the City's Landmarks Committee and the Architectural Board of Review (ABR) would have the opportunity to review the landscaping plans and ensure that landscaping is designed to be consistent with existing landscaping along Cabrillo Boulevard.

3.0 Mitigation Measures

In that the proposed project would not result in the degradation of on-site historic resources, no mitigations are warranted. However, because of the historical nature of the old City pump and screen plant building, finalized design details for the proposed pump house would be subject to Landmarks Committee review.

Furthermore, given that the site lies within the East Cabrillo Boulevard Parkway Historic District, landscape plans will need to be reviewed by the Landmarks Committee and the ABR This mitigation measure is consistent with the requirement in the aesthetics section of this EIR.

With final review of design details for the proposed pump house being conducted by the Landmarks Committee, and the review of landscaping plans by the ABR , residual impacts of additions to the old building or impacts to the Parkway Historic District would be less than significant and, therefore, no mitigation is required.

4.0 Residual Impacts

No residual impacts to historical resources are anticipated to result, given that final approval of design details would be subject to review by the Landmarks Committee.

E. NOISE AND VIBRATION

1.0 Environmental Setting

The following section summarizes a report prepared by Walker, Celano and Associates, Consultants on Acoustics, entitled "Acoustical Analysis Report for Waterfront Park, Hotel and Youth Hostel". This report is contained in its entirety within Appendix E of this EIR. In addition, definitions of all technical acoustical terms utilized within this report are also contained within Appendix E. The purpose of this study was to identify noise sources affecting both the park/hotel site and the hostel site, establish on-site noise levels, determine off-site noise impacts associated with the proposed project and specify noise control measures required to mitigate any significant noise impacts.

1.1 Existing Noise Sources

1.1.1 Park and Hotel Site

The proposed Waterfront Park and Hotel consists of an approximately 10 acre public park and a 150 room luxury hotel complex with associated parking. The site is bounded on the north by the Southern Pacific railroad right-of-way, on the east by Salsipuedes Street, on the south by Cabrillo Boulevard and on the west by Santa Barbara Street.

The westerly three-quarters of the site would be a public park. Park portion of the site facilities would include wetlands, a lagoon, a carousel, a children's play area, fountains, concession operations and various recreational opportunities. An automobile parking area would be located on the northwesterly portion of the site with access from Santa Barbara Street, just south of the railroad tracks.

The hotel is to be located on the easterly end of the site. The northerly face of the structure is to be located approximately 25 feet southerly of the northerly property line. This 25 feet setback would be utilized as a fire access road. The hotel would have a central courtyard that would be shielded from the railroad by the northerly wing of the building. The swimming pool and primary outdoor recreational facilities would be located within this courtyard.

The primary sources of existing noise impacting the park and hotel site are: Freight and Amtrak passenger train operations on the SPRR right-of-way along the northerly border of the site; intermittent operation of heavy equipment and rock crushing at the building materials facility located northerly of the SPRR right-of-way opposite the location proposed for the hotel portion of the site; and vehicular traffic on Cabrillo Boulevard (State Route 225) to the south. In addition, noise from distant traffic on Highway 101 is audible at the site.

In order to characterize the existing noise environment at the project site and to serve as a basis for the subsequent analyses, acoustic measurements were conducted at three representative positions on the site (refer to Appendix E for specific information regarding acoustic measurement positions). Acoustic measurement results from the respective three positions illustrate that the existing ambient noise levels on the project site vary widely. The average daytime noise levels at the northerly border of the site range from approximately 56 dB[43] in the absence of any identifiable noise sources to upwards of 80 dB during train passages. In addition, maximum noise levels in excess of 90 dB were observed due to trains. It should be

[43] dB or dB(A) refers to sound levels measured with the A-weighted network which filters sound in a manner similar to the human ear.

noted that although the noise measurement data illustrated in Table 1 of Appendix E is quoted to an apparent precision of 0.1 dB, which is the resolution of the digital displays on the noise analyzer, the absolute precision of the calibration is ± 0.4 dB.

In addition, noises from different sources add logarithmically; for example, 60 dB plus 60 dB equals 63 dB not 120 dB, and 55 dB plus 70 dB equals 70 dB not 125 dB. Therefore, if the unmitigated noise exposure at the rear of the site is DNL 68 due to the railroad and approximately DNL 60 due to Cabrillo Boulevard, the composite would be approximately DNL 68.6 (i.e., less than a 1 dB difference). For practical purposes, one should note that when dealing with railroad noise there are short periods of high noise level during the train passage, at which time traffic noise would be essentially inaudible, and the rest of the time the tracks make no noise in the absence of a train and the primary noise would be from vehicular traffic.

When assessing the project site after completion of proposed structures, the building elevation facing away from the noise generating source is shielded by the mass of the building itself, and thus is only impacted by the noise source it faces. On building elevations perpendicular to noise generating sources, the mass of the building shields half of the noise generated, thus reducing the noise level by approximately 3 dB.

1.1.2 Hostel Site

The proposed Youth Hostel is an approximate 9,700 square foot, 2 story building, which would be located southeasterly of the intersection of Montecito Street and Chapala Street. The first floor would be set back 20 feet from the southerly curb of Montecito Street and the second floor would have a 30 foot setback. Highway 101 is located immediately northerly of Montecito Street. The Southern Pacific railroad right-of-way is located approximately 180 feet southerly of the site.

The proposed structure is roughly "U" shaped around a central landscaped courtyard with the opening facing towards the west. This courtyard would serve as the primary outdoor space for the project, and would be shielded from Highway 101 by the northerly wing of the building.

The primary sources of noise impacting the proposed hostel site are auto and truck traffic on Highway 101 immediately north of the site, and freight and Amtrak passenger train operations on the SPRR right of way to the south.

In order to characterize the existing noise environment at the project site and to serve as a basis for the subsequent analyses, acoustic measurements were conducted at various times of day at 2 positions representative of the proposed location for the building (refer to Appendix E for specific information regarding acoustic measurement positions).

The results of the acoustic measurements obtained from positions 1 and 2 depict that the existing noise environment at the front of the hostel site (north facing) is quite noisy, average noise levels were in the $L_{eq15min}$[44] 67 to 72 dB range. Since the DNL[45] is typically approximately 2 dB higher than the daytime off-peak traffic average noise level, the estimated traffic noise exposure at the location proposed for the face of the building is approximately DNL 72 to 74. Computer printouts showing the time lines and statistical distribution of the overall A-weighted noise levels and the frequency spectra of the intrusive (L_1), ambient

[44] Equivalent Sound Level (Leq) is a sound of constant level which has the same total acoustical energy content.

[45] Day-Night Average Noise Level (DNL or Ldn - dB) refers to the long term average sound level, which is calculated by weighting sounds occurring between the nighttime hours of 10:00 PM and 7:00 AM by 10 dB (equivalently, the number of noise events is multiplied by 10).

($L_{eq15min}$) and background (L_{90}) noise levels associated with positions 1 and 2 are available at the City offices.

1.2 Applicable Thresholds

1.2.1 State of California Criteria

The "California Noise Insulation Standards" contained in Part 2, Title 24, CCR of the State Building Code, Appendix 35 Sound Transmission Control, place the following noise control requirements on new multiple residential structures including hotels, motels, dormitories, long-term care facilities and apartment houses:

1. Interior noise level in any habitable room, resulting from exterior noise sources must be limited to DNL or CNEL 45 with doors and windows closed. If the exterior noise exposure exceeds DNL or CNEL 60, an acoustical analysis is required demonstrating compliance with the prescribed interior noise limits. If windows and doors must be sealed or closed to meet the criterion, alternate ventilation or other means must be incorporated to provide an acceptable indoor environment.

2. Walls and floor-ceiling assemblies separating dwelling units or guest rooms from each other and from public or service areas such as interior corridors, garages and mechanical spaces must provide airborne sound isolation meeting STC 50 if laboratory tested. Field tested assemblies must meet NIC 45 for occupied units or NNIC 45 for unoccupied units. Corridor doors, including their perimeter seals must meet STC 26. Corridor wall segments containing doors must have a composite NIC or NNIC 30 rating.

3. Floor-ceiling assemblies separating units must provide impact sound insulation meeting IIC 50 if laboratory tested. Field tested assemblies must meet FIIC 45 for both occupied and unoccupied units, with the exception that the measured impact sound pressure levels shall not be normalized to a standard amount of absorption in the receiving room. Impact sound insulation is not required over non-habitable rooms or spaces not designed to be occupied, such as garages, mechanical rooms or storage areas.

1.2.2 Santa Barbara City Criteria

Land Use Compatibility Guidelines contained in Figure 2, page 1.19 and Table 3, page 2.24 of the City of Santa Barbara General Plan Noise Element are as follows:

- Maximum allowable interior noise exposure, due to exterior noise sources, for Residential, Transient Lodging and other noise sensitive land use categories is L_{dn} (DNL) 45 dB.

- Exterior noise exposure for "Transient Lodging" in the DNL 65 to 70 range is considered "Normally Acceptable" and noise in the DNL 70 to 80 range is considered "Normally Unacceptable" unless barriers are erected between the site and prominent noise sources to make the outdoor environment tolerable.

- Exterior noise exposure for Playgrounds and Neighborhood Parks in the DNL 55 to 65 range is considered "Normally Acceptable" and noise in the DNL 65 to 75 range is considered "Normally Unacceptable".

1.2.3 Railroad Noise Criteria

Relative to outdoor recreation areas, railroad noise requires special consideration. Periods of actual noise exposure are relatively infrequent and of short duration. In addition, the DNL averaging procedure applies a 10 dB penalty to noise events occurring during nighttime hours in order to account for potential sleep interference, which is a consideration in the indoor living environment. However, sleep disturbance should not be a consideration in outdoor spaces such as parks, etc.

1.2.4 Vibration Criteria

American National Standard S3.29-1983 "Guide to the evaluation of human exposure to vibration in buildings" establishes thresholds of perceptibility of vibration for the most sensitive individuals. These thresholds are referred to as base response curves, and depend upon the frequency of the vibration as well as the orientation of the body relative to the direction of the vibration.[46]

For vibrations which exceed this threshold, acceptability is based on a number of factors, including duration, repetition rate, activity at the reception points and individual sensitivity. For example, in residential settings, vibration amplitudes 1.4 to 4.0 times the base values are generally considered acceptable during daytime hours, while at night, the acceptability threshold would be 1.0 to 1.4 times the base value. Excessive vibration can result in structural damage to exposed buildings. The general criterion limit for building damage risk is 0.5-1.0 m/sec^2.[47]

2.0 Impact Analysis

2.1 Off-Site Noise Impacts

As stated previously in the Environmental Setting of this Noise Analysis, railroad operations, building materials facility operations and traffic noise have been identified to be the primary sources of off-site noise for the proposed park and hotel site. With regard to the proposed hostel site, traffic noise from U.S. Highway 101 and nearby railroad operations have been identified as the primary sources of off-site noise.

2.1.1 Park and Hotel Site

Railroad Operations

Presently, average railroad operations in the vicinity of the site are as follows: 6 unscheduled freight trains, and 6 Amtrak passenger operations southerly of the Santa Barbara station daily.[48] The scheduled Amtrak operations consist of the Coast Starlight once northbound and once southbound and the San Diegan twice northbound and twice southbound. In addition to these through operations, both San Diegans are parked on a siding immediately northerly of the site for service during the layover between the termination of the northbound operation and the beginning of the southbound run.

[46] A "combined axis base response curve" combines the most sensitive elements of the vertical and lateral curves. Measured vibration may be compared to the combined axis base curve by filtering the signal with a simple low pass network with a 5.6 Hz corner frequency (referred to henceforth as ANSI S3.29 weighting). According to ANSI S3.29, the minimum perceptibility threshold for vibration weighted in this manner is 0.0036 (3.60E-03) meter per second squared (rms).

[47] Tonndorf et al "Criteria of Noise and Vibration Exposure," *Handbook of Noise Control, 2nd Edition*, C. Harris, ed. p. 18-11.

[48] Representative of Southern Pacific Transportation Company (Mr. Doug Wubbena), December 1992.

DNL contour locations were computed for the operation activity described above. Time of day distribution for the non-scheduled freight operations was assumed to be 3 each during the day (7:00 a.m. to 10:00 p.m.) and night (10:00 p.m. to 7:00 a.m.) hours. The two Amtrak Coast Starlight operations occur during the afternoon (12:30 p.m. arrive from south, and 4:35 p.m. depart to south). Both San Diegan departures occur during daytime hours (7:45 a.m. and 3:15 p.m.), one arrival occurs approximately at noon and the other arrives at approximately 10:35 p.m. at night. The first San Diegan service layover occurs between approximately 1:00 and 3:00 p.m. and the second between approximately 11:00 p.m. and 7:00 a.m. the following morning. Thus, two service operations occur during day hours and two during night hours. This assumed distribution results in a DNL weighted total of 48 operations daily on the through tracks (8 during the day and 4 at night that are weighted by 10) and 22 operations daily (2 day and 2 at night weighted by a factor of 10) on the siding.[49] The results of the calculations are summarized below in Table VIE-1.

Table VIE-1
Railroad Noise Contour Locations for Waterfront Park and Hotel Site Relative to SPRR Right-of-Way Fence Line

DNL	Distance - feet
70	Within r-o-w
65	28
60	115
55	310
50	730

It should be noted that these calculations assume a "bare site" condition and "infinite" length of unshielded tracks. They do not include shielding that would be provided by intervening development on adjacent parcels, shielding of a train passage by another train parked on the siding, or sound reflection by structures on the opposite side of the tracks. It should also be noted that the 1 foot resolution tabulated is a computational artifact that has been retained for illustrative purposes. The actual railroad noise exposure at any given point could easily be 1 or 2 dB higher (or lower) than tabulated. For example, if the assumed distribution of freight operations were changed from 3 each during the day and night to 2 day and 4 night, the DNL weighted train count would increase from 70 to 79 per day, resulting in a noise increase of approximately 0.5 dB. As another example, if 2 additional freight operations were to occur during night hours, the DNL weighted count would increase to 90 per day, which would result in a 1 dB increase in railroad noise exposure.

The northerly face of the proposed hotel would be located approximately 25 feet southerly of the SPRR right-of-way fence. Thus, the exterior railroad noise exposure along the rear of the building would be approximately DNL 65 dB. This noise exposure would fall in the DNL 65-70 "Normally Acceptable" range for Transient Lodging. Therefore, existing railroad noise would not result in a significant adverse noise impact on the exterior uses of the proposed hotel portion of the site. However, in order to ensure that interior noise of the hotel is DNL 45 or lower, acoustically-upgraded window assemblies would be necessary to reduce train noise. **Therefore, existing railroad noise would result in a potentially significant adverse noise impact on the hotel's guest rooms.**

In the park portion of the site immediately along the northerly border of the site, the railroad noise exposure would be approximately DNL 68. This noise exposure would fall in the DNL 65-75 "Normally

[49] A weighted SEL value of 98.8 dB was utilized which was based on the railroad operation noise levels measured at both park and hotel site and the hostel site.

Unacceptable" range for Playgrounds and Neighborhood Parks. Although the proposed design of the project includes a 10-12 foot high perimeter wall which would separate the park and hotel site from the adjacent railroad tracks, proposed grading within the park portion of the site would reduce the wall's capability to effectively block noise. Existing elevations within the park portion of the site would be increased by a maximum of 10 feet at certain points adjacent to the proposed perimeter wall, which would result in portions of the wall being approximately two feet high relative to the park portion of the site. If park users are intended to frequent areas adjacent to the perimeter wall which are not a least seven feet below the wall, these park users would be exposed to noise levels considered Normally Unacceptable. **Therefore, existing railroad noise would result in a potentially significant adverse impact on the proposed park portion of the site.**

It is not likely that the proposal to add two additional Amtrak San Diegan operations would result in a significant change in the overall average railroad noise environment. Any additional operations would most likely occur during daytime hours, since the present operational schedule includes a late night arrival and subsequent early morning departure. Two additional trains would result in four additional through operations and possibly four additional service operations on the siding. Therefore, given the present DNL weighted daily train count of 70, the 8 potential additional operations would result in a DNL weighted total of 78 operations per day. This increase would result in a 0.5 dB increase in the DNL average railroad noise level, an essentially imperceptible change.[50] However, service operations on two additional trains would essentially double the activity on the siding and could result in a noticeable change in the average daytime railroad noise at the rear face of the hotel.

Adjacent Building Materials Facility Operation

Two consecutive measurement samples taken on the morning of December 22, 1992, demonstrate the noise impact of the rock crushing activity on the northeasterly portion of the hotel portion of the site. The rock crusher operated continuously during the 11:27-11:42 sample, resulting in an average noise level of $L_{eq15min}$ 73.5 dB, 25 feet southerly of the SPRR fence, the location proposed for the northerly face of the hotel. During the entire 11:51-12:06 sample the equipment was off and the average noise level was $L_{eq15min}$ 56.2 dB. It operated approximately half of the time during the measurements on December 22, but was not operating during the December 8 measurements.

If it is assumed that the rock crusher operates continuously for a full eight hour shift during the daytime, the resulting noise exposure due to the rock crusher operation alone would be approximately DNL 70. This would fall right at the upper limit of the Normally Acceptable range for Transient Lodging. However, because the rock crushing facility operates on an as needed basis, noise levels resulting from a full eight hours of operation are not a realistic representation of existing noise levels. If operation four hours a day is assumed, the result would be approximately DNL 68 and would be within the limit of the Normally Acceptable range for Transient Lodging. Therefore, the rock crusher operation would have the potential to result in adverse, but less than significant noise impacts on the proposed hotel.

Existing and Projected Traffic Noise

Traffic count data was obtained from the project traffic analysis prepared for this EIR by Omni-Means. On the westerly side of the intersection of Cabrillo Boulevard and Salsipuedes Street, the existing p.m. peak hour traffic volume was reported to be 1522 on Friday and 2122 on Sunday. Future p.m. peak hour traffic conditions were reported to be 1660 on Friday and 2288 on Sunday with the existing street configurations. If the Salsipuedes Street and Garden Street extensions are constructed, these future

[50] For normal listeners, changes of 1 dB or less are rarely discernable, a 3 dB change is clearly noticeable, and a change of 10 dB is necessary for the difference to be judged to be half or twice as loud.

projections increase to 1758 and 2366 respectively. Typically, p.m. peak hour traffic is approximately 8% to 10% of average daily traffic (ADT). On this basis, the estimated present daily traffic on Cabrillo Boulevard in front of the project site would be approximately 19,000 to 21,000 and the projected future traffic would be in the 22,000 to 24,000 range.

These data were used as input to a computerized traffic noise prediction model. Present traffic was assumed to be 21,000 ADT and future traffic was assumed to be 24,000 ADT. Average speed was assumed to be 40 mph and truck mix was assumed to be 4% of ADT. The calculated DNL contour locations for conditions are summarized below in Table VIE-2.

Table VIE-2
Calculated A-weighted Traffic Noise Contour Locations Relative to the Centerline of Cabrillo Boulevard

DNL dB	Traffic Condition	
	Present (21,000 ADT)	Year 2010 (24,000 ADT)
75	25 feet	26 feet
70	52 feet	58 feet
65	129 feet	143 feet
60	313 feet	346 feet
55	675 feet	730 feet
50	1232 feet	1311 feet

It should be noted that these calculations assume a "bare site" condition and an "infinite" length road. They do not include shielding that would be provided by any intervening development on adjacent parcels. The southerly face of the proposed hotel would be located approximately 110 feet from the center of Cabrillo Boulevard. At this distance, the calculated exterior traffic noise exposure would be approximately DNL 65 for the present traffic and DNL 66 for the projected future traffic. These noise exposures fall in the "Normally Acceptable" range for "Transient Lodging". Therefore, existing and projected exterior traffic noise from Cabrillo Boulevard would not result in a significant adverse noise impact on the exterior uses of the proposed hotel portion of the site. However, in order to ensure that interior noise of the hotel is DNL 45 or lower, acoustically-upgraded window assemblies would be necessary to reduce traffic noise. **Therefore, existing and projected traffic noise would result in a potentially significant adverse noise impact on the hotel's guest rooms.**

Cabrillo Boulevard is approximately 55 to 60 feet wide, therefore the traffic noise exposure in the proposed park would be in the DNL 60 to 70 dB range depending on location and distance from Cabrillo Boulevard. Portions of the proposed park located less than 143 feet from the center line of Cabrillo Boulevard would be exposed to noise levels of approximately DNL 69 for the present traffic and DNL 70 for the projected future traffic. Therefore, portions of the proposed park located less than 143 feet from the center of Cabrillo Boulevard would be exposed to noise levels that exceed the City's General Plan Noise Element guideline of DNL 65, which is the "Normally Acceptable" limit for Neighborhood parks. It should be noted that Chase Palm Park is located directly south of Cabrillo Boulevard and is presently subjected to the same noise levels, which exceed the "Normally Acceptable" limit for parks. Chase Palm Park is utilized by approximately 1,015,000 persons per year. Mitigation measures capable of reducing traffic noise levels below the "Normally Acceptable" limit of DNL 65 for parks would consist of erecting an acoustic wall between Cabrillo Boulevard and the proposed park.. However, City Staff has indicated that an acoustic wall along Cabrillo Boulevard between the park site would not be a realistic and feasible measure because

of the visual ramifications associated with such a wall. The visual impacts associated with erecting a solid wall along a designated potentially scenic highway would be far greater than the benefit achieved by lowering the DNL by 5 dB to be within the "Normally Acceptable" noise limits for parks. **Therefore, noise resulting from traffic on Cabrillo Boulevard would result in an unavoidable significant adverse noise impact on portions of the proposed park within 143 feet from the center line of Cabrillo Boulevard.**

Traffic noise contour locations were also computed for Salsipuedes Street for present traffic, future traffic with the existing street configuration and future traffic with the Salsipuedes Street and Garden Street extensions. Average daily traffic was assumed to be 3100, 5000 and 7500 for the three conditions respectively, based on the data in the Omni-Means traffic study. Average speed was assumed to be 35 mph, and truck mix was assumed to be 3% of ADT. The results are summarized below in Table VIE-3.

The easterly face of the proposed hotel is to be located approximately 65 feet from the center of Salsipuedes Street. At this distance the exterior traffic noise exposure would be approximately DNL 60 for the present traffic and approximately DNL 62 to 64 for the future traffic without and with the street extensions. These noise exposures are below the DNL 70 "Normally Acceptable" limit. Therefore, existing and future projected traffic noise associated with Salsipuedes Street would not result in a significant adverse noise impact on the proposed hotel portion of the site.

U.S. Highway 101 is located approximately 1200 feet north of the northern border of the park portion of the site and hotel portion of the site. However, the site is shielded from the highway by existing development located between the railroad right-of-way and the highway. Therefore, noise associated with U.S. Highway 101 would not result in a significant adverse noise impact on the proposed park or hotel.

Table VIE-3
Calculated A-weighted Traffic Noise Contour Locations Relative to the Centerline of Salsipuedes Street

DNL dB	Traffic Condition		
	Present (3,100 ADT)	Future (5,000 ADT)	Future with Extensions (7,500 ADT)
70	26	27	29
65	31	37	49
60	56	80	109
55	134	193	263
50	321	449	585

The reader should note these calculations assume that the train would be unshielded during its entire passage by the project site. In actuality, there are several existing structures, including the Station, located between the tracks and the site. Thus, these calculations are conservative and the actual railroad noise levels would be lower than tabulated.

2.1.2 Hostel Site

Railroad Operations

Average railroad operations in the vicinity of the project are as follows: 6 unscheduled freight trains and 2

Amtrak Coast Starlight passenger operations daily north of the station.[51] In addition to these "through" operations, the Amtrak San Diegan enters the station from the south and subsequently departs to the south, a total of eight times daily. However, noise resulting from these San Diegan operations does not significantly impact the hostel site because of shielding by the station structure and other existing development located southeasterly of the site.

DNL contour locations were computed for the operation activities described above. Time of day distribution for the non-scheduled freight operations was assumed to be 3 each during the day (7:00 a.m. to 10:00 p.m.) and night (10:00 p.m. to 7:00 a.m.) hours. The two Amtrak Coast Starlight operations occur during the afternoon; 12:30 p.m. departure to the north and 4:35 p.m. arrival from the north.[52] The results of the calculations are summarized below in Table VIE-4.

The southerly face of the hostel building would be located approximately 170 to 190 feet north of the center of the SPRR right-of-way. Therefore, according to the Railroad Noise Contour Locations provided above, unshielded railroad noise exposure at the exterior of the building would be DNL 60 or lower, and would be within the "Normally Acceptable" exterior noise range allowable for "Transient Lodging". Therefore, railroad noise would not result in a significant adverse noise impact on the proposed hostel.

Table VIE-4
Railroad Noise Contour Locations for Youth Hostel Site
Relative to Center of SPRR Right-of-Way

DNL	Distance - feet
65	54
60	170
55	537
50	1698

Highway 101 Noise Modeling

Present and projected future traffic count data for Highway 101 were obtained from Caltrans. Count stations nearest the project site are located at Las Positas, approximately 2.5 miles north of the site, and at Milpas, approximately 1.25 miles to the south. The available counts were taken prior to the completion of the Freeway construction project through downtown Santa Barbara.[53]

These data were used as input to a computerized traffic noise prediction model, and the present traffic was assumed to be 100,000 ADT, approximately midway between the counts reported at the stations on either side of the site. Future traffic was assumed to be 160,000 ADT, a value towards the upper end of the projected growth range.[54] Average speed was assumed to be 55 mph, the posted speed limit. The calculated DNL contour locations for conditions are summarized in Table VIE-5, below.

51 Representative of Southern Pacific Transportation Company (Mr. Doug Wubbena), December 1992.

52 This assumed distribution results in a DNL weighted total of 35 operations daily (5 during the day and 3 at night weighted times 10).

53 Traffic at Las Positas was reported to be 119,000 ADT with 6.7% total trucks split 2% medium and 4.7% heavy. At Milpas the traffic was 80,000 ADT with the same truck percentages. Caltrans projections for future traffic conditions in the project area are 20 year growth factors in the 1.43 to 1.64 range.

54 The computer model incorporates the reference noise emission levels contained in Caltrans Report FHWA/CA/TL-84/13 and utilizes a distance attenuation calculation procedure that incorporates atmospheric absorption as well as wave spreading effects.

Table VIE-5
Calculated A-weighted Traffic Noise Contour Locations Relative to the Centerline of Highway 101

DNL dB	Traffic Condition	
	Present Distance - feet (100,000 ADT)	Year 2010 Distance - feet (160,000 ADT)
80	80	107
75	172	243
70	396	543
65	810	1036
60	1424	1742
55	2287	2731

The actual precision of the calculations is on the order of 10 to 20% of the distance, due to the various assumptions used in the calculations. The calculations are based on projections for ADT and vehicle mix some 20 years in the future, but utilize average vehicle noise emission levels based on acoustic measurement data taken some 7 to 9 years ago.

The northerly face of the proposed building would be located approximately 120 feet from the center of Highway 101. At this distance the calculated exterior highway noise exposure would be approximately DNL 77 for the present traffic and DNL 79 for the projected future traffic. This exterior noise exposure in the DNL 77 to 79 range exceeds the Normally Acceptable limit of DNL 70 for Transient Lodging by 7 dB for the present traffic and by 9 dB for the projected future traffic. However, the primary outdoor activity area of the facility would be located in an enclosed central courtyard that would be shielded from the highway by the northerly wing of the hostel building. Therefore, existing and future exterior noise resulting from U.S. Highway 101 would not result in a significant adverse noise impact on the exterior activity area of the proposed hostel.

However, if patio or balcony areas are to be located on the northerly face of the building, they should be considered non-essential spaces which would be subjected to significant adverse noise impacts from U.S. Highway 101. If it is desired to reduce noise in these areas, barriers on the order of 9 feet high would be necessary depending on location and orientation. **Therefore, noise resulting from U.S. Highway 101 would result in a significant adverse noise impact on exterior living spaces which would be located on the northern side of the proposed hostel, and noise mitigation measures would be necessary to make these outdoor living spaces tolerable.** In addition, acoustically upgraded building envelope construction and closed windows would be necessary to ensure conformance with the DNL 45 interior noise limit.

2.2 On-Site Noise Impacts

2.2.1 Park and Hotel Site

Mechanical Equipment

Mechanical equipment for air conditioning (and refrigeration) systems for the proposed hotel could have the potential to result in an adverse noise impact on the proposed hotel and easterly portions of the park portion of the site, if the appropriate equipment is not selected or located with proper consideration of potential noise. Outdoor and rooftop mounted equipment such as cooling towers, air cooled chillers and refrigeration

compressor systems can produce A-weighted noise levels in excess of 70 dB at distances of 30 to 50 feet. In addition, equipment noise often contains tonal components that can be clearly audible and annoying at levels that are below the ambient noise at the receiving location. Complaints such as these could occur even though the equipment noise is not noticeable in the immediate vicinity of the building, due to the shielding effect of the edge of the roof and/or the parapet. **Therefore, mechanical equipment associated with the proposed hotel would result in a potentially significant adverse noise impact.**

Park Facilities and Human Activity

Park facilities such as concession operations and carousels, as well as general activity of park patrons, would all be sources of noise to some degree. However, these noises are "natural" and "typical" to a park environment and thus would not constitute a significant noise impact within the park portion of the site. If noise generated by some specific activity in a particular location within the proposed park portion of the site is objectionable to some person, that person can move to another portion of the park portion of the site where that noise is not significant. These noise sources could be audible outside the westerly face of the proposed hotel; however, they would be inconsequential in comparison to noise resulting from a train passby. Therefore, the proposed park facilities and associated human activities would not result in a adverse noise impact.

Project Generated Traffic

Traffic count data for Friday and Sunday P.M. peak hour for existing, cumulative growth and project related traffic were obtained from the project traffic analysis. Calculations were run for the three intersections most impacted by the project traffic to determine the impact of the project traffic on the overall average traffic noise. The results of these calculations are summarized on the following page in Table VIE-6.

Upon examination of the data in Table VIE-6 it can be seen that the effect of the project related traffic on the overall traffic noise in the vicinity of the project is minimal. With the exception of Salsipuedes Street, which serves as the entry point to the proposed hotel portion of the site parking garage, the increases in average traffic noise due to the project would be less than 1 dB and would be essentially unnoticeable. The 2 to 3 dB increase along Salsipuedes Street could be noticeable; however, it would not be significant in view of the low traffic volumes involved, namely peak hour traffic volumes on the order of 200 to 400.

The proposed extensions of Salsipuedes Street and Garden Street would not change the project generated traffic volumes. However, some project related trips and some cumulative trips would be redistributed throughout the area. Nevertheless, these changes would be insignificant because of the small percentage of the total trips that are project-related. Therefore, project generated traffic would not result in a significant adverse noise impact.

Park's Public Address System

A public address (PA) system is proposed for installation at the Great Meadow Pavilion within the proposed park portion of the site. The PA system would be located approximately 180 feet westerly of the western face of the proposed hotel. The anticipated park usage of the PA system is for announcements, concerts by small musical groups, weddings and other "low" to "moderate" sound level performances/activities. High sound level rock band concerts are not anticipated to occur. The primary audience area would be on the meadow situated west and southwest of the pavilion. Therefore, the primary coverage area of the PA system would be oriented away from the location of the proposed hotel.

Table VIE-6
Noise Impacts of Project Related Traffic

		Hourly Traffic Volume			Average Traffic Noise Increase - dB		
Intersection	Leg	Exist	Exist + Cum	Ex+Cum +Proj	(Exist+Proj)/ Exist	(Exist+Cum)/Exist	(Ex+Cum+Proj)/(Exist+Cum)
		Friday PM Peak Hour					
Cabrillo & Santa Barbara	N	364	433	498	0.71	0.75	0.61
	E	1629	1681	1757	0.20	0.14	0.19
	S	84	85	85	0.00	0.05	0.00
	W	1665	1733	1768	0.09	0.17	0.09
Cabrillo &	N	108	145	233	2.59	1.28	2.06
	E	1506	1533	1571	0.11	0.08	0.11
	W	1522	1584	1660	0.21	0.17	0.20
Montecito &	N	1697	1760	1766	0.02	0.16	0.01
	E	576	588	592	0.03	0.09	0.03
	S	768	816	821	0.03	0.26	0.03
	W	1255	1278	1281	0.01	0.08	0.01
		Sunday PM Peak Hour					
Cabrillo &	N	612	684	778	0.62	0.48	0.56
	E	2057	2118	2223	0.22	0.13	0.21
	S	223	223	223	0.00	0.00	0.00
	W	2098	2177	2230	0.11	0.16	0.10
Cabrillo &	N	249	286	405	1.70	0.60	1.51
	E	2101	2125	2179	0.11	0.05	0.11
	W	2122	2183	2288	0.21	0.12	0.20
Montecito &	N	1505	1548	1554	0.02	0.12	0.02
	E	483	493	497	0.04	0.09	0.04
	S	966	999	1007	0.04	0.15	0.03
	W	928	944	950	0.03	0.07	0.03

If it is assumed that there would be no "high level" sound reinforcement system operation, maximum sound levels of approximately 80 dB at the rear of the audience area, approximately 150 feet from the pavilion, could be anticipated. Off-axis sound levels, i.e., sound in areas outside of the intended coverage area, produced by a directional sound system would be at least 10 dB lower than sound levels within the desired coverage area. Therefore, the PA system would produce sound levels of approximately 70 dB, which is the "Normally Acceptable" maximum sound level for exterior spaces of transient lodging. Sound at the 70 dB level would be audible at the westerly exterior space of the proposed hotel; however, PA sound would be lower than that of noise generated by passing trains. Therefore, the proposed PA system would result in a potentially adverse, but less than significant noise impact. Measures capable of further reducing less than significant noise impacts associated with the proposed PA system are contained within the Mitigation Measures of this Noise Section.

2.3 Vibration Impacts

Ground vibration is a potential issue in the following two elements of the park and hotel portion of this project: 1) Insertion of foundation pilings for the proposed project structures may produce noticeable levels

of vibration in existing structures in the project area; and 2) Passing railroad trains at the north side of the project may produce noticeable levels of floor vibration within the hotel.

2.3.1 Park and Hotel Site

Short-term Vibration and Construction Noise Impacts

Driven pile insertion technique results in short duration bursts of ground vibration which propagates outward at a rate which is dependent upon soil conditions. In order to determine approximate noise and vibration levels associated with pile driving operations, a measurement program was undertaken at a construction site in the Garden Grove area, using equipment of a type similar to that which would be anticipated for use at the Waterfront Park and Hotel project.[55]

Two pile drivers were operating at the measurement site, one 70 feet from the property line and the other 265 feet from the property line. Both were driving 40 foot long square concrete piles. Measurements were taken at the property line. The drivers were diesel powered units, with the power pack portion located behind the driving head, at an additional distance estimated at 30 feet.

Pile Vibration Impacts

Review of the soils report for the Waterfront Park and Hotel portion of the project[56] indicates that the ground near the surface is a complex stratification of fill, silt and clay. Because of the complex composition of the park and hotel site's soil, it is not possible to assess the degree of similarity between the project site soil and the conditions at the Garden Grove test site. Therefore, in order to determine approximate vibration propagation characteristics for the project site, the measured vibration levels for the railroad at 25 foot and 150 foot distances from the tracks were compared.[57]

The existing Red Lion Resort buildings nearest to the proposed project are located approximately 250 feet away. The measurements at the Garden Grove test site indicated that maximum vibration levels at 265 foot distance did not exceed the ANSI acceptability criterion for operating rooms (0.7 times the base curve) and were just barely perceptible to measurement personnel. Therefore, it is unlikely that any significant vibration impacts would occur at the adjacent Red Lion Resort. **Nevertheless, because of the complexity of soil composition, the potential does exist for pile insertion to result in a potentially significant adverse vibration impact on the western portions of the Red Lion Resort.**

Pile Insertion Noise Impacts

It is clear from the pile insertion noise measurement results (refer to Appendix E, for complete results) that the only element of the pile driving noise which is distinct from typical construction equipment is the actual impact noise. Although the overall (Time Average) noise level of the impact noise is similar to levels for tractors, graders and large trucks, the impulse level is higher by approximately 13 dB.[58] Because a 10 dB

55 These measurements were conducted in September, 1989 by Walker, Celano & Associates as a part of a study for Community Memorial Hospital Medical Building in Ventura. The associated discussion is adapted from that study.

56 Law/Crandall, Incorporated, Preliminary Geotechnical Design Data Proposed Park Plaza Development Cabrillo Boulevard Between Santa Barbara and Salsipuedes Streets, June 1992.

57 Results of the comparison suggest an approximate 0.8 power of distance drop-off rate in the vibration amplitude. Since the measurement distances were small compared with the length of the trains, the drop-off rate for a concentrated excitation such as the pile driving could be expected to be in the range 1.5 to 1.8, similar to that measured at the Garden Grove site. Hence, the data taken at 265 feet in Garden Grove would be approximately representative of levels expected at similar distances at the Waterfront Park and Hotel site.

58 Presuming a 3 dB increase from 70 to 50 feet, consistent with the 11-12 dB increase from 265 to 70 feet and the theoretical wave-spreading loss rate of 6 dB per distance doubling.

increase in sound for normal listeners is generally considered to result in a sound twice as loud, the approximate 13 dB increase associated with pile insertion is considered significant. **Therefore, noise resulting from pile insertion would result in an unavoidable short-term significant adverse noise impact.** However, the use of alternative construction techniques instead of pile insertion, if feasible, would reduce short-term noise impacts to acceptable levels.

Construction Noise Impacts

That construction of a large facility would produce significant adverse short-term noise impacts on nearby noise-sensitive uses is a foregone conclusion. As mentioned above, mitigation measures capable of reducing the potential of construction equipment to impact noise-sensitive activities (i.e., sleeping) are provided below. **Construction of the proposed park and hotel would result in short-term significant adverse noise impacts on Chase Palm Park and the adjacent Red Lion Resort.**

Long-term Vibration Impacts

To assess the potential for train vibration impacts on the proposed hotel portion of the site, ground vibration levels were measured during passage of a freight train and two passenger trains on December 22, 1992 (refer to Appendix E, Table 9 for entire measurement results).

At the 25 foot distance (location of the closest point on the proposed hotel) train induced ground vibration generally falls in the borderline range relative to residential criteria established in ANSI S3.29. At the 150 foot distance, the vibration is generally within the acceptable range. The exception was for the locomotives of the northbound Coast Starlight, which produced vibration amplitudes 3.6 times the perception threshold at 25 feet and 2.7 times the threshold at 150 feet. However, since the duration of these brief "maxima" in the vibration levels is only two seconds or so, it is questionable whether they would be a serious source of annoyance in the hotel.

Since measured vibration levels occasionally exceed for very brief duration recommended ANSI S3.29 vibration levels, adverse vibration impacts relative to hotel guest perceptibility could occur. However, these levels are not high enough to have a significant potential for causing building damage. Therefore, existing train operations would result in sporadic noise episodes creating adverse, but not significant, vibration impacts on hotel guests.

3.0 Mitigation Measures

3.1 Off-Site Noise Measures

3.1.1 Park and Hotel Site

In that existing off-site activities would result in potentially significant adverse noise impacts on the proposed park and hotel site, the following mitigation measures would be required to reduce impacts to insignificant levels.

- An acoustic barrier shall be erected along the northerly border of the park portion of the site to reduce train noise exposure to DNL 65 or lower. On the basis of the train noise levels measured on the site, a minimum barrier height of 8 feet relative to the tracks, assuming that the finished grade in the park portion of the site is approximately level with the tracks, would reduce the railroad noise exposure in the park portion of the site to approximately DNL 60. If grading in the park portion of the site results in a significant increase in elevation relative to the tracks, the wall height would have to be increased so that the top of the wall is no less than 7 feet above the finished grade

on the park portion of the site in any area that would be easily accessible to park patrons. It should be noted that the northern border of the westerly portion of the park portion of the site, between the parking lot turn-around and Santa Barbara Street (approximately 480 feet) would not require an acoustical barrier.

- In order to conform with the DNL 45 interior noise requirement in the hotel guest rooms, a minimum of 23 dB of exterior-to-interior noise reduction would be necessary to reduce train noise. Closed, well sealed, acoustically-upgraded window assemblies shall be installed in order to achieve this degree of noise control. Fixed windows would not be necessary. Since the windows would have to be closed at least part of the time in order to meet the DNL 45 interior noise criterion, alternative ventilation with cooling, if necessary to maintain a habitable interior environment per applicable City and State Code requirements, would be required. Exact requirements for windows would depend on size, orientation, etc., and would be determined during preparation of construction drawings for the project.

- In order to conform with the DNL 45 interior noise requirement in the hotel guest rooms, a minimum of 21 dB of exterior-to-interior noise reduction would be necessary to reduce traffic noise. Closed, well sealed, window assemblies and ventilation as described above under railroad noise mitigation shall be installed in order to achieve this degree of noise control.

3.1.2 Hostel Site

In that existing off-site activities would result in potentially significant adverse noise impacts on the proposed hostel, the following mitigation measures would be required to reduce impacts to insignificant levels.

- Because railroad noise exposure is below DNL 65, mitigation of exterior use areas is not required. In addition, "normal construction" typically achieves 20 dB of exterior-to-interior noise reduction with the windows closed. Therefore, the DNL 45 interior noise criterion shall be met with the use of closed windows and alternative ventilation as described above. Acoustically rated windows would not be necessary on the southerly face of the building.

- The exterior noise exposure at the northerly face of the hostel would be approximately DNL 77 for the present traffic and DNL 79 for the projected future traffic. However, the primary outdoor activity area of the facility would be located in an enclosed central courtyard that would be shielded from the highway by the northerly wing of the building. Thus, no additional noise mitigation would be necessary for this space. If patio or balcony areas are to be located on the northerly face of the building (along Montecito Street), they should be considered non-essential spaces. If it is desired to reduce noise in these areas, barriers on the order of approximately 9 feet high (depending on location and orientation) shall be installed. Exact details would be determined during the preparation of construction drawings.

- In order to conform with the DNL 45 interior noise requirement in the hostel guest rooms, a minimum of 32 dB of exterior-to-interior noise reduction would be necessary for the present traffic and 34 dB for the future traffic. Acoustically-upgraded, exterior wall constructions and closed, well sealed, acoustically-rated window assemblies having an STC rating of 32-34 shall be installed to achieve this degree of noise control. Fixed windows would not be necessary. Since the windows would have to be closed to meet the DNL 45 interior noise criterion, alternative ventilation with cooling, if necessary to maintain a habitable interior environment per applicable City and State

Code requirements, would be required. Exact requirements for windows would depend on size, orientation, etc., and would be determined during preparation of construction drawings for the project.

3.2 On-Site Noise Measures

In that mechanical equipment associated with the proposed hotel portion of the site would result in potentially significant adverse noise impacts on the proposed hotel portion of the site and easterly portions of the park portion of the site, the following mitigation measures would be required to reduce impacts to insignificant levels.

3.2.1 Park and Hotel Site

- The design, selection and placement of mechanical equipment for the proposed hotel portion of the site shall be completed to avoid impacting the easterly portion of the proposed park and hotel guests. In addition, appropriate sound attenuating measures such as silencers and/or enclosures shall be provided where necessary on outdoor equipment (i.e., cooling towers, air cooled condensers and refrigeration compressors/condenser units) and at the air intake and discharge openings for the building ventilation systems. Strict compliance with the property line noise limits contained in the City Noise Ordinance shall be required to minimize the potential for noise impacts from on-site mechanical equipment.

3.3 Vibration and Related Noise Measures

In that short-term potentially significant vibration and noise impacts have been identified for the proposed hotel, the following mitigation measures would be required.

3.3.1 Park and Hotel Site

- The use of an alternative construction method which could feasibly replace pile insertion during the construction of the proposed hotel would avoid short-term significant adverse noise impacts. Therefore, if technically feasible, an alternative construction method shall be utilized instead of pile insertion. However, if alternative construction methods are not utilized, short-term unavoidable significant adverse noise impacts would result.

- If a pile insertion is to be used, a test pile shall be run prior to actual construction to verify assumptions relative to vibration propagation and building responses and to determine remedial strategies in case of problems at the nearby Red Lion Resort buildings. Any recommendations made as a result of the test pile shall be incorporated into the construction process.

- All construction equipment shall be provided with well-maintained, functional mufflers. Construction activity shall be restricted to 8 AM - 5 PM, Monday - Friday. Construction activities shall not be permitted on weekends or nationally recognized holidays. Only emergency work should be allowed to occur outside of the permitted hours.

3.4 Recommended Measures

3.4.1 Park and Hotel Site

The proposed public address system could have the potential to result in an adverse impact on westerly portions of the hotel portion of the site. In addition, train-induced vibrations could result in potentially adverse vibration impacts on hotel guests. Therefore, the following mitigation measures are recommended to further minimize noise impacts:

- Usage of the proposed public address system should be limited to low or moderate sound level performances. In addition, high level sound amplification, such as loud rock type concerts, should not be permitted. The sound systems should be designed with adequate directionality to confine the sound to the intended audience areas, thus minimizing sound intrusion into the hotel area.

- The brief nature of train-induced vibrations suggests that they result from locomotives passing over a "rough spot" or uneven segment within the tracks near the measurement site. It may be possible to reduce substantially the train-induced ground vibration by eliminating any uneven joints in the tracks within the vicinity of the hotel portion of the site or through other maintenance efforts. Therefore, portions of the Southern Pacific railroad tracks in the vicinity of the park and hotel site should be examined for uneven segments and all identified rough spots should be eliminated.

4.0 Residual Impact Statement

Incorporation of the above mitigation measure would reduce the potentially significant long-term noise impacts on the proposed hotel and hostel to acceptable levels. However, using the threshold for "playgrounds [and] neighborhood parks" from the Noise Element for the park component would result in significant unavoidable noise impacts to park users. It should be noted that there are questions about using this threshold for a park that is essentially an "urban park" surrounded by commercial uses and activities. Please see the Noise Element discussion on page 36 within Section V, Land Use Considerations, for additional discussion.

Potentially significant short-term noise impacts generated by construction of the proposed Waterfront Project would be reduced to acceptable levels with incorporation of the above mitigation measures. However, if pile insertion is utilized during the construction of the hotel, instead of an alternative construction technique, significant short-term noise impacts to the Red Lion Resort and Chase Palm Park would result.

F. VISUAL RESOURCES

1.0 Environmental Setting

Aesthetic/visual resources are associated with both natural and artificially made landforms and structures. According to the City of Santa Barbara's General Plan, Conservation Element, there are two types of aesthetic resources perceived: the first being, those areas possessing aesthetic qualities attributable to natural or artificial amenities; and secondly, those locations from which scenic resources can be viewed. Santa Barbara's natural scenic features consist of coastal bluffs and shorelines, prominent mountain and foothill ridgelines that provide scenic backdrops, as well as scenic vegetation located along creek corridors and on undeveloped land in the City. Artificial scenic resources located within the City consist of numerous architecturally significant structures and planned open space/recreational areas, such as Chase Palm Park. There are also numerous locations, such as the Riviera and the Mesa, which provide views of the City's prominent scenic features.

1.1 Park and Hotel Site

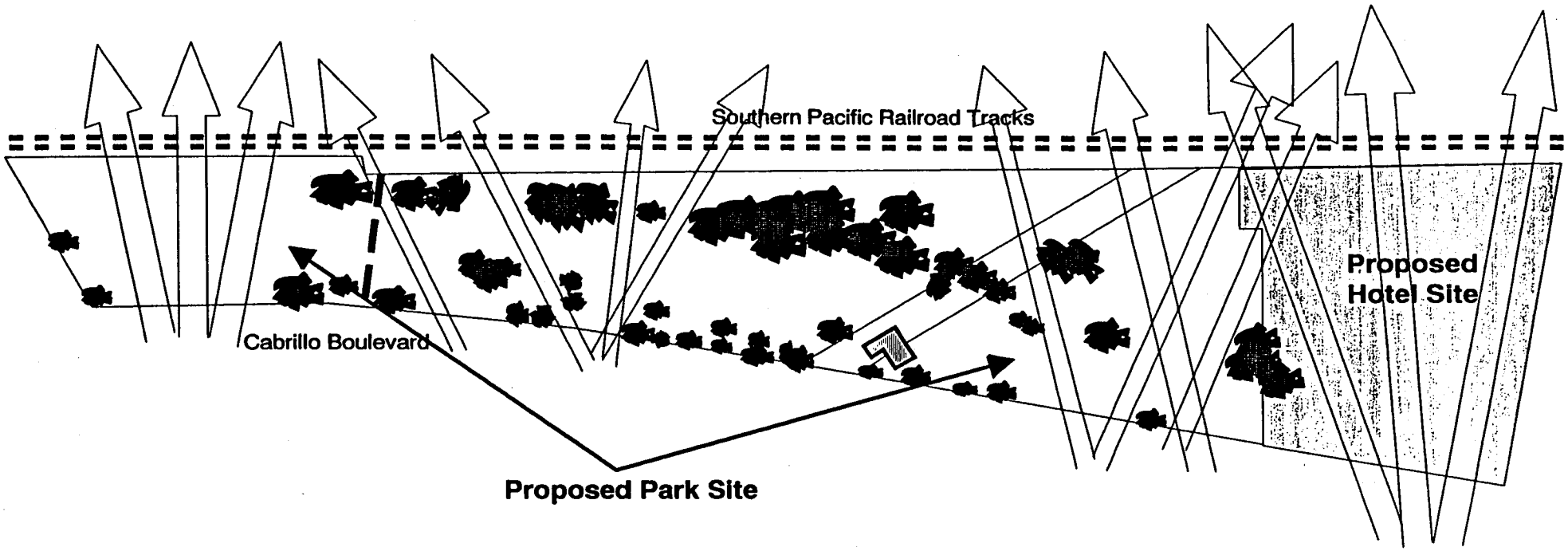
The proposed park and hotel site consists of a total site area of 13.107 acres, including the proposed parking lot at the corner of East Mason Street and Santa Barbara Street. Situated on the north side of Cabrillo Boulevard, between Santa Barbara and Salsipuedes Streets, this site remains one of the last large, contiguous, undeveloped areas north of Cabrillo Boulevard. Although a large portion of the site is currently open space, several land uses ranging from a 1920's tourist resort (Shore Acres) to the existing Waterfront District's administrative offices have existed on portions of the site.

The visual impression created by the site when viewed from off-site locations is that of a primarily undeveloped, heavily vegetated area. However, because of the large amount of refuse dispersed throughout the site, as well as the commercial and industrial equipment stored on-site, the site can be characterized as presently being in poor visual condition. A large portion of the equipment being stored on-site is not visible from the heavily utilized Chase Palm Park and adjacent beach area, as a result of the site's existing vegetation. The commercial and industrial related facilities are located in the center portion of the site, primarily between Laguna Channel and Carpinteria Street. The portion of the site which is utilized for equipment storage is encompassed within a chain link fence, which creates a visual impression of a small salvage yard. Portions of the site located outside of the chain link fence are presently littered with unwanted refuse.

Laguna Channel, which flows in a north to south direction bisecting the western 1/3 of the site, is also littered with rubbish and is considered to be in poor visual condition. Presently there are pungent, unappealing smells originating from Laguna Channel that appear to be the result of stagnant water and algae, which have added to the visual degradation of the site. West of Laguna Channel, a large portion of the site has been covered with gravel and vegetation is limited. In addition, this portion of the site west of Laguna Channel contains a large refuse pile of unwanted articles ranging from shopping carts and trash to burnt wood pilings.

1.1.1 Existing On-site Aesthetic Resources

Although the majority of the site is considered to be in poor visual condition, there are several aesthetic resources located on-site which provide a distinct overall visual character to the site (refer to Figure VIF-1 for location of sensitive on-site visual resources). Views of the site from distant locations (i.e., the Riviera,



LEGEND

Architecturally Significant Structure (old City pump and screen plant)

Visually Significant Trees (large specimen or skyline trees)

Established Creek Corridor (Laguna Creek)

Indicates Existing View Corridors

N

NO SCALE

FIGURE VIF-1

SENSITIVE VISUAL RESOURCES

INTERFACE

Stearns Wharf, etc.) are enhanced and do not depict a visually degraded site, as a result of the site's large skyline trees and existing vegetation. Existing aesthetic resources located on the proposed park and hotel site consist of the following features:

- The overall open space character of the site
- Large specimen skyline trees, primarily Eucalyptus and Monterey Cypress
- The drainage characteristics and surface water of Laguna Channel
- The City's old pump and screen plant building which was constructed in 1924 with a Spanish Colonial architectural motif

In addition, the visual prominence associated with the location of the site along Cabrillo Boulevard (City's Conservation Element designated potential scenic highway) is also considered an element of the site's visual context.

The undeveloped, heavily vegetated visual impressions created by the proposed project site are a result of the large amount of vegetation, skyline trees and the lack of structures and planned development located on-site. This large amount of existing vegetation provides the majority of texture and color associated with the site. Remaining on-site vegetation primarily consists of ruderal grasslands, which are comprised of such common species as Bermuda grass, puncture vine, sweet clover, etc..

Laguna Channel enters the site as a drainage channel which crosses under the Southern Pacific Railroad tracks. Once on-site, Laguna Channel meanders through the site in a north to south direction and exits via a drainage channel beneath Cabrillo Boulevard. Although the present visual condition of Laguna Channel is lacking aesthetic appeal, the presence of a natural waterway on-site is considered a significant aesthetic resource because it adds visual character and diversity to the site.

With the removal of the old Puritan Ice Plant building in 1991, the old City pump and screen plant became the only architecturally significant or historical structure currently located on-site. The City pump and screen plant has a Spanish Colonial Revival architectural motif and was built in 1924. This single-story, white stucco and red tile roof structure is considered an aesthetic resource because of its historical significance and its architectural motif; the building provides an early example of the architectural style that has created important visual impressions of the City of Santa Barbara over the last 70 years. In addition to the old pump and screen plant, there is one temporary industrial building and numerous storage facilities located on-site, but these structures lack any architectural significance and do not provide any appealing aesthetic qualities. These storage structures are considered aesthetically unappealing and add to the degradation of the site's visual condition.

1.1.2 Surrounding Aesthetic Features

The overall visual characteristics existing within the immediate vicinity of the park and hotel site are those of a highly utilized recreational beach area and a commercial/tourist area. However, the immediate project area is comprised of diverse land uses ranging from recreational to industrial uses. The park and hotel portion of the site is presently situated in a visually prominent transition zone within the Waterfront Area. This visual transition zone and existing diversity in land uses is attributed to the location of the site between the scenic Cabrillo Boulevard and the City's relatively small, yet active, industrial area. Although portions of the City's industrial area are visible from Cabrillo Boulevard, the majority of the industrial area is screened by the proposed park portion of the site's existing vegetation, as well as Fess Parker's Red Lion Resort.

The prominent visual features existing within the immediate project area consist of both natural and artificial features. Prominent physical features visible from the proposed park and hotel site are: the Pacific Ocean located approximately 500 feet south of the project site; East Beach and Chase Palm Park located directly south of the site across Cabrillo Boulevard; Fess Parker's Red Lion Resort located directly east of the project site across Salsipuedes Street; the City's Visitors Bureau and a three-story structure housing commercial and residential uses located directly west across Santa Barbara Street; and the industrial area which includes the City's El Estero Wastewater Treatment Plant, the Cal Mat Concrete facility and numerous other industrially related facilities located immediately northeast of the site across the Southern Pacific Railroad tracks. In addition, the Riviera and Santa Ynez Mountains located north and northeast of the park and hotel site are highly visible and provide a prominent backdrop when looking north from or across the project site.

1.2 Hostel Site

The proposed hostel site is situated on the southeastern corner of Chapala and Montecito Streets, across from the Moreton Bay Fig Tree, at 33 W. Montecito Street. The site consists of four existing parcels totaling 0.55 acres. Although the hostel site is currently vacant, development of the site dates back to an auto sales and repairs business established in 1930. The most recent development to be located on the site was a Shell Oil Company Service Station, which was demolished in 1989.

Visual impressions created by the site depict a disturbed and vacant parcel. Significant aesthetic resources located on the proposed hostel site are limited to the seven trees situated on the southern boundary of the site. The open space visual resource associated with the site is considered minimal. In addition to the other aspects of this vacant site, it does provide a more open appearance in which to view the Moreton Bay Fig Tree.

1.2.1 Surrounding Aesthetic Features

The visual character of the area located within the vicinity of the hostel site can be attributed to the following features: The old Railway Express Building (now Open Air Bicycles) located just south of the site; the City's designated Landmark Moreton Bay Fig Tree and adjacent public open space located just west of the site across Chapala Street; U.S. Highway 101 located to the north; and the commercial buildings to the east. The Santa Barbara Railway Station and three-story Neal Hotel are also located within the immediate vicinity of the site. The Railway Station is located directly behind (south of) Open Air Bicycles, while the Neal Hotel is located east of the site behind the existing commercial buildings. When viewing the immediate area from the proposed hostel site, the Moreton Bay Fig Tree is considered the primary visual resource because of its overwhelming prominence associated with the large size and distinct character of the tree. As with the majority of the Downtown area of Santa Barbara, there are several buildings within the vicinity of the hostel site which are considered architecturally significant. The old Railway Express Building and the existing Railway Station represent architectural significance associated primarily with the utilization of a Mission Revival motif.

1.3 Impact Methodology

Evaluating aesthetic value and visual quality involves subjective evaluation, because the manner in which an area is perceived relies on the perception of the individual viewer. In most cases, the visual quality of an area is established by the diversity of its characteristics. The description of an area's visual quality is based on an evaluation of the diversity of characteristics such as vegetation, geologic formations, drainage

patterns, overall landscape character and aesthetically significant structures. These qualities should be considered for the general vicinity as well as for the specific site under analysis. The degree of potential visual impact severity is typically based on views from public as opposed to private viewsheds and on the number of people that have access to the viewshed.

Specifically, the methodology utilized to determine significant adverse aesthetic impacts in the impact analysis below is based on the following criteria:

- A decline in the project site's existing visual condition, which can be determined by assessing whether the project results in the site being restored to a higher level of appearance or a decrease in the existing appearance.

- The removal or degradation of a significant aesthetic resource located on-site without the replacement or restoration of the affected aesthetic resource.

- The visual compatibility of the proposed project with the existing visual character of the surrounding area. Specifically, with regard to the size, bulk, scale and architecture of the proposed structures.

- The decline or improvement of existing prominent views, which would be attributed to the placement of structures on the site or the removal of skyline trees.

According to CEQA standards, a project that would have a substantial, demonstrable negative aesthetic effect is considered to have a substantial adverse impact on the environment. The development of structures and landscaping, which are incongruous in relation to their surroundings and/or visually degrade or obstruct major public scenic views, would be considered to have a negative aesthetic effect and thereby would result in a significant adverse impact. Therefore, if the proposed project would result in the decline of the site's existing visual quality, or create a significant decline of prominent public views, or would be visually incompatible with the site's surrounding visual character, a significant adverse visual impact would result from development of the proposed project.

2.0 Impact Analysis

According to the initial study prepared by the City's Community Development Department on the proposed Waterfront Park, Hotel and Hostel Project potentially significant visual impacts could occur. Concerns addressed in the initial study for the park and hotel site are associated with obstructing or degrading existing public views from prominent viewing areas, such as the Riviera, Cabrillo Boulevard and Chase Palm Park. In addition to the initial study, the park and hotel site has undergone preliminary development review with the City's Architectural Board of Review (ABR) and the Landmarks Committee. With regard to the park and hotel site design, the City's ABR and Landmarks Committee addressed concerns that the park and hotel should appear as separate entities to avoid the appearance that the park portion of the site is part of the hotel grounds. In addition, the City's ABR and Landmarks Committee are concerned that there are too many individual areas and activities planned within the park portion of the site.

With regard to the proposed hostel, potentially significant impacts addressed in the initial study are associated with the degradation of existing views of the Landmark Moreton Bay Fig Tree. In addition, the Landmarks Committee is concerned that not enough trees were incorporated into the hostel's landscape design.

2.1 Park and Hotel Site

2.1.1 Anticipated Visual Change of the Site

The anticipated post-project site form would eventually consist of 10 acres of public park with paved walkways, recreational facilities, numerous flower gardens and landscape schemes, as well as several individual park components (i.e., The Lagoon, The Wilds, The Tot Lot, etc.). In addition, the post-project form would include a 150 room luxury hotel built on the eastern 3 acres of the site. [Development of the proposed hotel would utilize approximately 400 linear feet of the project site's 2,000 linear feet total (approximately 20% of the total site).] The hotel portion of the site would be bordered on the south and west by flower gardens and an intricate landscape scheme. The implementation of the park on the 10 acre portion of the site includes the removal of 98 trees/shrubs, and would also entail the planting of 441 new trees, as well as other plantings. The proposed park and hotel site would include the removal of the aesthetically unappealing storage facilities and all associated equipment, which would be considered a visual benefit to the site. The visually degraded Laguna Channel would also be restored and enhanced with native and non-native plant species. In addition, the proposed park portion of the site would include the introduction of additional water elements (The Lagoon and The Wilds) to the site. These additional water elements would add to the existing visual character and diversity of the site. Therefore, development of the proposed project would result in an improvement of the visual character, quality and diversity of the site. However, the site's existing visual character which is depicted as primarily undeveloped, heavily disturbed and degraded open space, would be changed into that of a planned, landscaped, public park. Nevertheless, the visual change resulting from development of the proposed project would be considered a visual benefit because of the site's existing degraded condition. Therefore, the change in the site's existing visual condition to the anticipated future condition of the proposed park and hotel site would not result in a significant adverse visual impact. In addition, the anticipated visual change would be considered a beneficial visual impact to the site and immediate vicinity, as a result of the revitalization and cleanup of the currently dilapidated site.

2.1.2 Removal or Degradation of Significant Aesthetic Resources

Loss of Visually Significant Vegetation

Table VIF-1 depicts the actual number of trees and shrubs proposed for removal and to be planted as part of the project.

Table VIF-1
Tree/Shrub Inventory for Park and Hotel Site

Vegetation Type	Existing	To Be Removed	To Be Planted
Trees	125	43	441
Shrubs	61	55	NA*
Trees/Shrubs Total	186	98	NA*

*Proposed species list is a general list which provides a variety of vegetation to be selected by the City's Architectural Board of Review and Landmarks Committee prior to issuance of Building Permits.

As illustrated above in Table VIF-1, development of the proposed park and hotel site would entail the removal of 98 of the 186 trees/shrubs on-site. Because the existing vegetation provides the majority of the aesthetic appeal currently associated with the park and hotel site, this vegetation is considered a significant aesthetic resource. However, some of the existing vegetation is considered visually more significant than

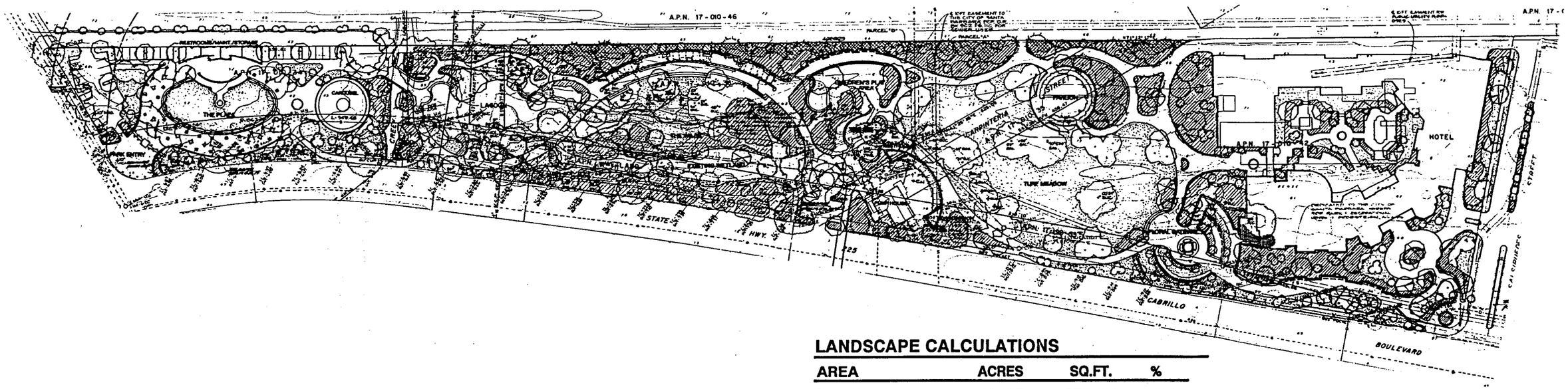
others. For example, the large specimen and skyline trees located on-site are visually more prominent than smaller shrubs and are, therefore, aesthetically more significant to the visual character of the site. Although development of the park and hotel site would remove approximately 1/2 of the existing trees and shrubs located on-site, the majority of the large prominent trees proposed for removal are currently in poor health or are structurally in poor shape and were recommended for removal by a certified arborist (refer to Appendix G, Biological Information, for Arborist's Tree Management Plan). It should be noted that the proposed park portion of the site's numerous skyline trees are considered to be the site's primary aesthetic resources, along with the general open space character of the site. Because nearly all of the healthy, visually significant, skyline trees located on-site are proposed to remain with development of the park and hotel site, loss of a small amount of physically unhealthy or structurally poor skyline trees would be considered insignificant. In addition, the proposed project would entail the planting of 441 new trees on the park and hotel site, which would eliminate the potential for long-term visual impacts associated with loss of 98 trees/shrubs (refer to Figure VIF-2, Conceptual Landscape Plan). However, during the construction phase of the park and hotel, the site would be visually degraded until the proposed landscaping has been established and matured to some degree.

According to the proposed project's Landscape Architect, George Girvin, the planting of project vegetation would utilize a priority planting method that targets specific areas of the park and hotel site that are currently lacking significant vegetation or are considered to be visually sensitive as a result of the visibility of the area from off-site viewing locations. The priority planting plan would entail planting these targeted areas with large size container plantings (i.e., 48 inch boxes, 15 gallon, etc.) which would immediately enhance the visual appearance of these areas. In addition, the project's Landscape Architect has had discussion with the City of Santa Barbara's Arborist, Dan Condon, to begin the planting of these targeted areas prior to the completion of construction of other visually less significant areas, which would also speed up the visual enhancement of these targeted areas. The planting of the more heavily vegetated areas (i.e., the proposed Wilds, etc.) would utilize smaller 1 and 5 gallon container plantings, as a result of the large amount of vegetation already existing in these areas. It should also be noted that the proposed planting of slow growing, longer-lived species (i.e., coastal live oak trees, etc.) would entail the integrated planting of faster growing, shorter-lived species between the slower growing, longer-lived species. The integrated planting of fast growing species would visually enhance the area planted with slow growing species until these slower growing species have matured. At the time when the slower growing, longer-lived species have matured and are in need of additional growing space, the faster growing, shorter-lived species would be removed to allow for continued growth of the longer-lived, slower growing species. **Therefore, removal of existing vegetation located on the site would result in a short-term unavoidable significant adverse visual impact for approximately 2 years from the start of project construction.** However, short-term visual impacts would be reduced to insignificance after the proposed landscaping has been established (approximately 2 years) and long-term impacts would not result.[59]

Loss of Open Space

Along with the large specimen trees described above, the open space character of the site is considered to be the primary aesthetic resource associated with the site. Development of the proposed 150 room hotel would convert 3 acres of the site's approximate 13 acres of existing open space to hotel/motel use. Therefore, development of the proposed park and hotel site would entail approximately 3/4 of the site remaining in open space and 1/4 being converted to hotel/motel use. It should be noted that the eastern three acres of the site proposed for hotel development are currently lacking the aesthetic diversity and character associated with the remaining western 10 acres. The portion of the site proposed for hotel

[59] The amount of time needed for the proposed landscaping to mature would be relative to the size and growth rate of the vegetation when planted.



LANDSCAPE CALCULATIONS

AREA	ACRES	SQ.FT.	%
Total Site Area	13.107	570,922	100%
Total Landscape	6.34	275,889	48.3%

LANDSCAPE SUMMARY

PARK LANDSCAPE		
Turf area	3.046	132,717
Planting area	2.588	112,771
HOTEL		
Turf area	0.314	13,687
Planting area	0.383	16,714
TOTAL	**6.334**	**275,889**

LEGEND

- PROPOSED TREES (Conifers)
- PROPOSED TREE (Accent/Shade)
- PROPOSED TREE (Palms/Cycads)
- PROPOSED Shrub (Tall/Screen/Hedge)
- PROPOSED SHURBS (Small/Medium/Accent)
- PROPOSED PLANTS (Fragrant)
- PROPOSED WETLAND SPECIES (Wetland to be added)
- PROPOSED TURF GRASS
- EXSITING WETLAND TO BE REMOVED

See Figure VIF-1 for Delineation of Existing Trees.

N

PROPOSED TREES

TYPE OF TREE	AMOUNT PROPOSED
Conifers	56
Shade	100
Accent	68
Palms	217
TOTAL # OF TREES	441

NO SCALE

SOURCE: George W. Girvin Associates

FIGURE VIF-2

CONCEPTUAL LANDSCAPE PLAN

INTERFACE

development has been heavily disturbed with fill material, which has resulted in limited vegetation and aesthetic appeal. There are no creek corridors existing on this portion of the site and significant vegetation is limited to two large Eucalyptus trees which will be preserved with development of the hotel portion of the site. Because of the lack of visually appealing vegetation or any other significant aesthetic resources, this portion of the site is considered to be aesthetically deficient when compared to the proposed park portion of the site, although it does offer a view corridor for more distant views.

The proposed three-story, 45 foot tall, luxury hotel would be designed in an Andalusian architectural motif, which would be accompanied by a simple fountain and floral garden fronting Cabrillo Boulevard. The placement of the proposed hotel on the 3 acre site would not displace any significant aesthetic resources associated with the 13 acre site as a whole. Conversely, the 3 acre site would be developed with visually appealing gardens and landscaping, as well as an architectural motif which represents the existing aesthetic character of the City of Santa Barbara. In addition, more than 3/4 of the 13 acre site would remain in open space (10 acre public park). It should be noted that directly south of the site across Cabrillo Boulevard exists a large area of open space which borders the Pacific Ocean. Therefore, the loss of three acres of previously disturbed open space which would be attributed to the development of the proposed hotel would not result in a significant adverse aesthetic impact. In addition, it is anticipated that the development of the hotel portion of the site and related flower gardens, fountains and landscaping could be an aesthetic benefit to this aesthetically deficient portion of the site.

2.1.3 Visual Compatibility With Surrounding Visual Character

As previously mentioned, the existing uses within the visual vicinity of the proposed park and hotel site vary greatly. On the northern boundary of the site exist the Southern Pacific Railroad tracks and the City's small industrial area. To the south, southwest and southeast of the site exist open space and recreational areas and facilities, which are considered an important visual resource for the scenic Cabrillo Boulevard. West of the site, there are numerous commercial businesses and restaurants which provide the heavily touristed area with commercial services. Fess Parker's Red Lion Resort is situated to the east and has been designed in a Spanish Colonial architectural motif reflective of the City's architectural design requirements. All of the above mentioned uses are visible from different portions of the 13 acre project site.

Development of the proposed park and hotel site would provide open space, recreational facilities, dining opportunities and overnight accommodations on the 13 acre site. From a visual perspective, the 10 acre public park would be visually compatible with the open space and recreational area located south of the site, as well as the visual theme currently existing on Cabrillo Boulevard. In addition, the proposed park portion of the site would entail the planting of 441 new trees which would over time provide an effective visual buffer to further restrict views of the unappealing industrial uses located north of the site. Because much of the area located along Cabrillo Boulevard reflects recreational uses and visitor serving uses, the proposed park portion of the site would be visually compatible with existing uses and structures. Therefore, development of the proposed park portion of the site would not result in a significant adverse visual impact with regard to visual or architectural compatibility.

With regard to the development of the proposed luxury hotel, the hotel would be set back approximately 80 feet from the closest point on Cabrillo Boulevard and would utilize an architectural motif (stucco walls and red tile roofs) compatible with that of the adjacent Red Lion Resort. The western portion of the existing Red Lion Resort located adjacent to the proposed hotel portion of the site is set back approximately 65 feet from Cabrillo Boulevard. The proposed hotel would have a maximum height of 45 feet above the existing grade which is similar to the maximum height of the Red Lion Resort, measured at similar distances from Cabrillo Boulevard. Therefore, the proposed hotel would be consistent with the architectural motif, height

and setback of the nearest structure (Red Lion Resort). Although the proposed hotel would be smaller in overall size than the larger Red Lion Resort, the overall bulk, scale and size of the proposed hotel would be compatible with the existing visual theme of Cabrillo Boulevard. In addition, the proposed hotel would be consistent with the majority of the existing uses (visitor serving) provided along Cabrillo Boulevard. As for the public open space area located to the south across Cabrillo Boulevard and the proposed 10 acre public park to the east, the proposed hotel portion of the site would be considered visually compatible with these areas. Because the industrial area situated north of the hotel portion of the site, across the railroad tracks, consists of large, unappealing, concrete structures, as well as a conglomeration of small structures and large construction equipment, the proposed Andalusian Hotel and associated landscaping would be considered visually incompatible with the industrial area located north of the site. Nevertheless, the proposed hotel would be visually compatible with all other near-by uses. In addition, the combination of the proposed hotel being oriented towards Cabrillo Boulevard and the proposed use of a 10-12 foot high site wall along the northern boundary of the site would reduce the potential for visual incompatibility with the near-by industrial area. Therefore, the proposed hotel portion of the site would be anticipated to be visually compatible with the visual vicinity and significant adverse visual impacts associated with visual compatibility would not result.

The combined visual theme of the proposed park and hotel would be considered visually compatible with existing visual theme of Cabrillo Boulevard. The project, as a whole, would create recreational, commercial and lodging images that are presently depicted along the majority of Cabrillo Boulevard (i.e., Chase Palm Park, East Beach, West Beach, Stearns Wharf, Red Lion Hotel, numerous other hotels and restaurants, etc.). Because Cabrillo Boulevard and the Waterfront Area is highly utilized by residents and tourists alike, the existing visual theme is a direct result of these recreational and visitor serving uses. Therefore, the overall visual theme of the proposed park and hotel would be compatible with the existing visual character of the Waterfront Area and significant visual impacts associated with compatibility would not result.

2.1.4 Prominent Vantage Points

Because of the topographic diversity of the Santa Barbara area, the project site is visible from several public viewing locations within the City of Santa Barbara. There are three general areas which offer visually significant views of the site and the general project area. The three general areas are as follows: 1) The beach-front area which includes Cabrillo Boulevard and Chase Palm Park; 2) Stearns Wharf; and 3) portions of the Riviera area. These three areas which offer views of the project site are comprised of foreground and mid-ground perspectives. In general, vantage points which offer fore-ground, mid-ground and background perspectives of the project site are employed to perform a complete assessment of potential visual impacts which may occur as a result of the proposed project. The foreground perspective generally ranges from the site boundary to a distance of approximately 2,500 feet from the site. Within this range while looking directly at the site, the site is the visually dominant feature in the viewer's frame of visual reference. The mid-ground perspective extends from the boundary of the foreground view to approximately 15,000 feet (nearly 3 miles) from the site depending on existing topographic and visual conditions. The background perspective encompasses that viewing range which begins from the limits of the mid-ground perspective and extends to a point where the boundaries of the site can still be defined. However, significant views of the site from the background perspective are not available because of topographic and vegetative obstructions, which eliminate the potential for the proposed project to impact views beyond 15,000 feet from the site. Therefore, background views of the site are not evaluated within this report.

The vantage points described below were selected for impact analysis as a result of existing site and vicinity conditions, as well as the public's potential to observe the site from these public viewing locations.

The locations of these vantage points are illustrated in an Index Map provided in Figure VIF-3.

Vantage Point 1 - Cabrillo Boulevard

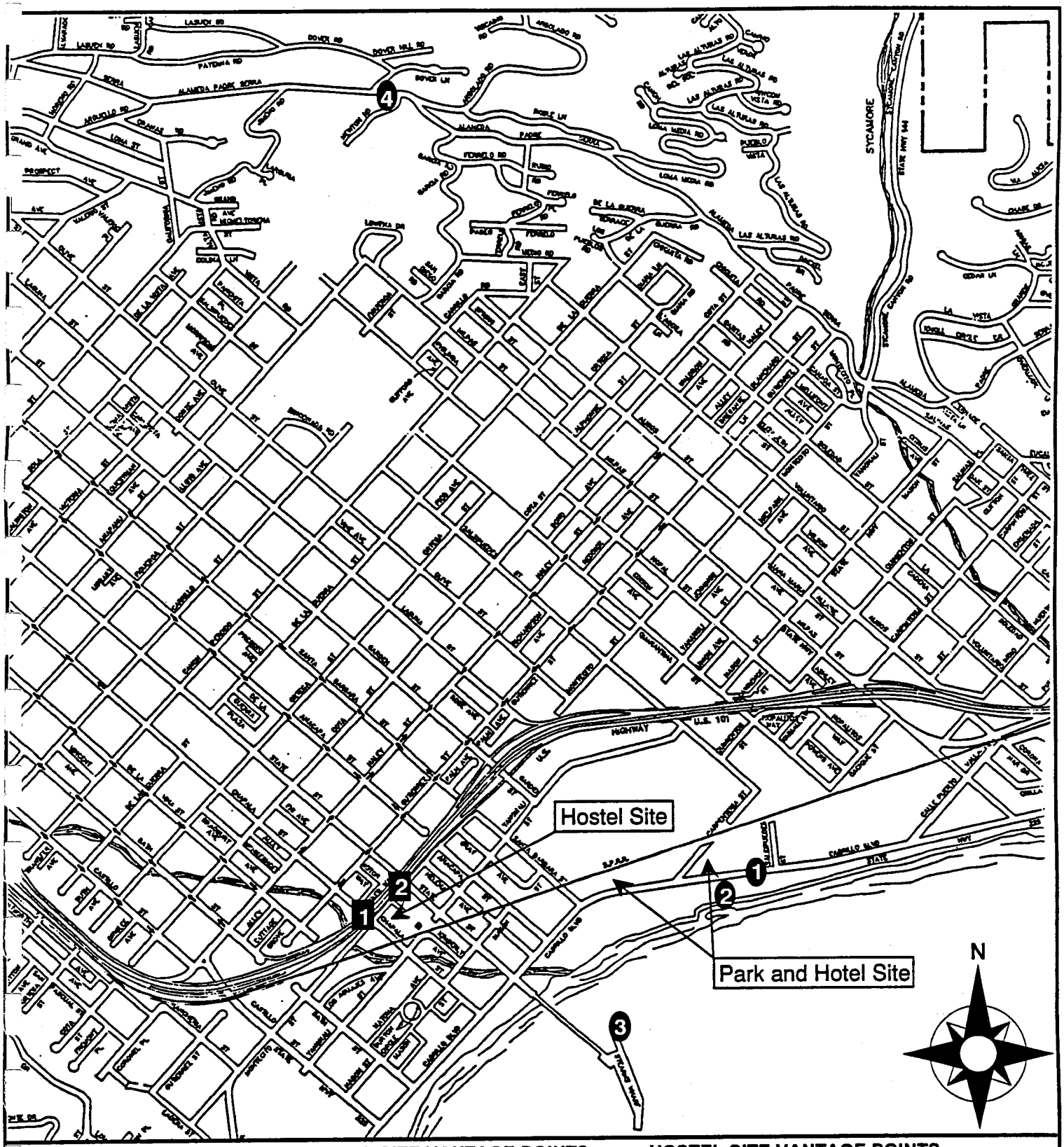
Cabrillo Boulevard is located adjacent to the southern boundary of the park and hotel site and parallels the site for approximately 1,970 feet in an east to west direction. Cabrillo Boulevard has been designated as a potential State Scenic Highway, as a result of its proximity and exposure to the shoreline as well as the views of the mountains and Andree Clark Bird Refuge. The purpose of the scenic highways designation is the protection and enhancement of the natural scenic resources of the highway corridor and the assurance that the highway incorporates not only safety, utility and economy, but also beauty.[60] Cabrillo Boulevard is a heavily traveled roadway with an average daily traffic volume of at least 19,000 vehicles at the intersection of Santa Barbara Street and Cabrillo Boulevard (southern and western border of the proposed park portion of the site).[61] Because Cabrillo Boulevard is situated parallel to the shoreline, panoramic views of the Pacific Ocean and foreground views of the shoreline, Chase Palm Park and Stearns Wharf are considered to be the most prominent available from Cabrillo Boulevard. Views observed to the north from Cabrillo Boulevard consist of the City's visually unappealing industrial area in the foreground, the scenic Riviera in the mid-ground and the prominent Santa Ynez Mountains in the background. However, because the existing vegetation located on the proposed park portion of the site obstructs views of the City's industrial area, views of the industrial area are only clearly visible through the portion of the site proposed for hotel development. Views of the Riviera and Santa Ynez Mountains are also hampered by the park portion of the site's existing vegetation, but views of the Riviera and mountains are available through occasional viewing corridors which exist between skyline trees. Nevertheless, unobstructed mid-groundviews of the scenic Riviera and background views of the Santa Ynez Mountains are currently available through a view corridor existing on the vacant hotel portion of the site. Figure VIF-4 provides a photograph of the site from Cabrillo Boulevard.[62]

The close proximity of the shoreline and Pacific Ocean to Cabrillo Boulevard serves to direct a major portion of the viewer's attention and focus to the south. The planned landscape schemes of the proposed park portion of the site would enhance existing fore-ground views of the site when observed from Cabrillo Boulevard. The occasional unappealing views of the park portion of the site's existing storage facilities would be replaced with aesthetically appealing vegetation, which would be considered a visual benefit to this potential State Scenic Highway. Therefore, development of the proposed park portion of the site would enhance foreground views observed when traveling on Cabrillo Boulevard. Although existing views of the Riviera and Santa Ynez Mountains observed through the proposed park portion of the site are presently limited due to skyline trees, the proposed park's landscaping would have the potential to further restrict existing Riviera and mountain views. The park portion of the site's proposed landscape plan would entail the removal of 98 trees and the planting of 441 new trees. Because 217 of the proposed 441 trees would be palm trees, 224 of the 441 proposed trees would have the potential to block views of the Riviera or mountains. Although some palm trees can be considered skyline trees, palm trees do not significantly obstruct views due to the lack of foliage and the physical attributes generally associated with this type of tree. Consequently, because 217 of the proposed 441 trees would be palm trees, only the remaining approximately 224 of the (proposed) 441 new trees would have the potential to block views of the Riviera or mountains. Nevertheless, the park portion of the site's proposed new skyline trees would have the

[60] City of Santa Barbara, General Plan - Scenic Highways Element, 1974.

[61] Omni-Means Transportation Engineers and Planners, Transportation and Circulation Analysis for Waterfront Project, 1987.

[62] These photographs were taken utilizing a 50 mm camera lens during the month of December, 1992. A 50 mm lens is considered to provide a perspective similar to normal human eyesight in terms of depth and character size, and therefore is typically used in visual impact analysis.



PARK AND HOTEL SITE VANTAGE POINTS

1. VANTAGE POINT 1 - Cabrillo Boulevard
2. VANTAGE POINT 2 - Chase Palm Park
3. VANTAGE POINT 3 - Stearns Wharf
4. VANTAGE POINT 4 - Alameda Padre Serra

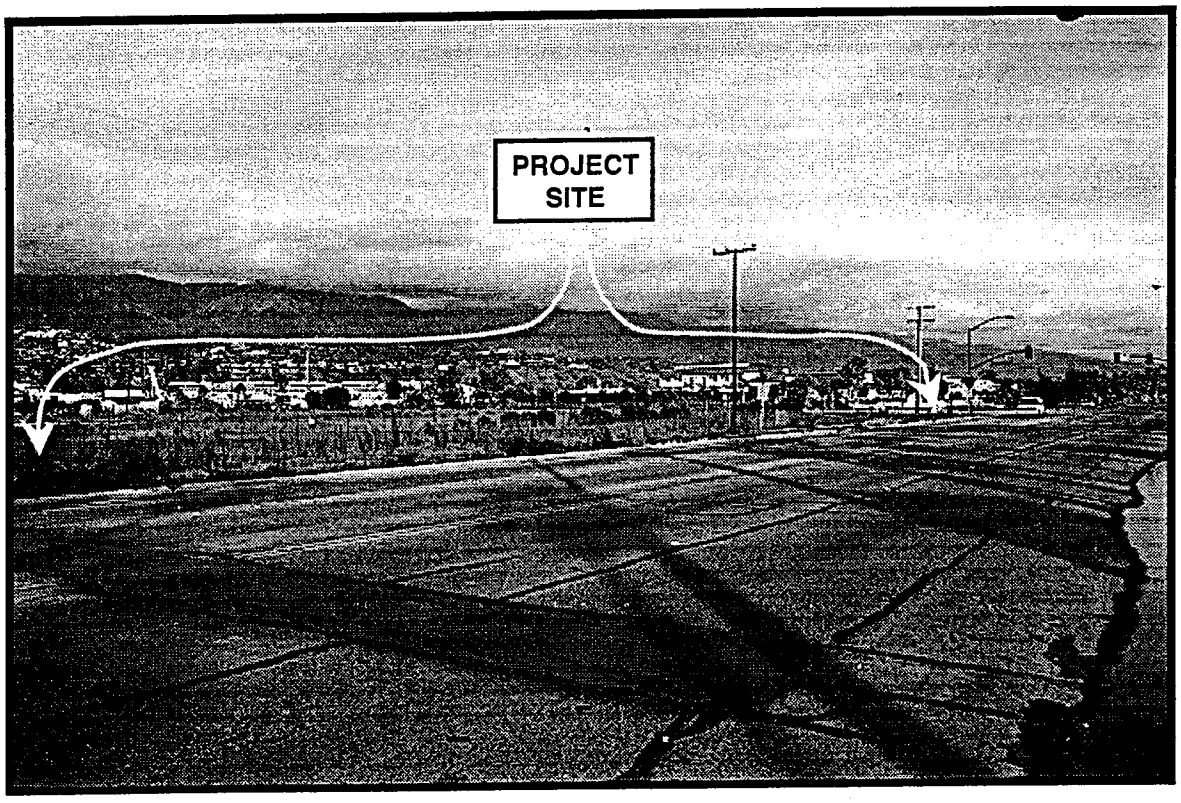
HOSTEL SITE VANTAGE POINTS

1. VANTAGE POINT 1 - U.S. Highway 101
2. VANTAGE POINT 2 - Montecito Street

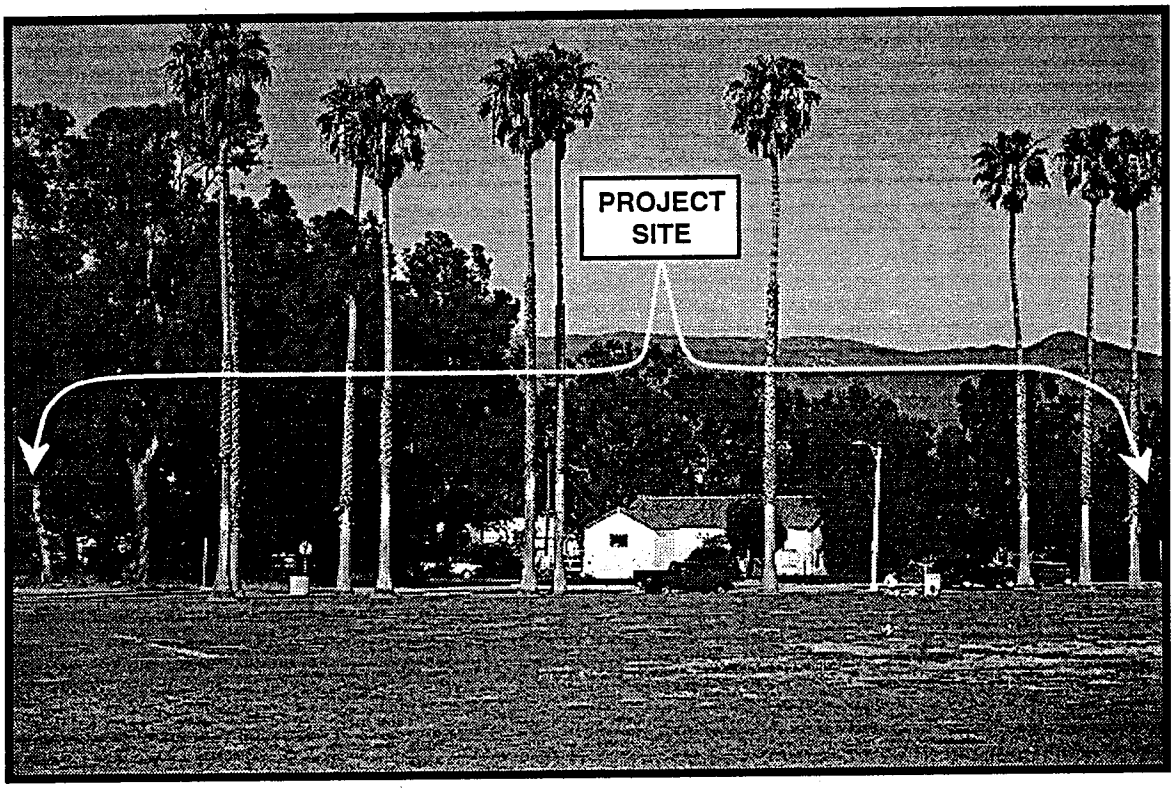
NO SCALE

FIGURE VIF-III
INDEX MAP

INTERFACE



Looking northeast from Cabrillo Boulevard (existing condition).



Looking north from Chase Palm Park (existing condition).

FIGURE VIF-4

PHOTOGRAPHS OF PARK AND HOTEL SITE

INTERFACE

potential to further restrict views of the Riviera and Santa Ynez Mountains observed through the park portion of the site from Cabrillo Boulevard.

Unobstructed mid-ground and background views of the Riviera and Santa Ynez Mountains, which are observed through the vacant and near treeless hotel portion of the site, would have the potential to be blocked by the solid mass of the proposed 45 foot high hotel structure (refer to Appendix F, Aesthetic Information, for graphic of line of sight viewsheds). Because the proposed hotel portion of the site is envisioned to be developed with Hotel and Related Commerce (according to current zoning and Coastal Plan designations), design conditions within the Specific Plan governing the hotel portion of the site were established in an effort to reduce the potential for future development to result in significant visual impacts. In general, these design conditions limit the structural height of all potential future structures to three stories and 45 feet above the existing grade. Specific Plan design conditions governing the hotel portion of the site also require all structures to be setback a minimum of 75 feet from the curb line of Cabrillo Boulevard. Setbacks for Salsipuedes Street require one story structures to be set back 40 feet from the property line and 75 feet for two story structures. The Specific Plan Amendment, which is part of the proposed project, includes a proposal to change the existing setback to 33.5 feet from the finished curb line of the widened Salsipuedes Street. This proposed change in Salsipuedes Street setback requirements would result in the setback being 41.5 feet closer than presently allowed by the existing Specific Plan (refer to Section V, Land Use Considerations for additional Specific Plan information). The proposed hotel would be set back 86 feet from the nearest point of Cabrillo Boulevard and 33.5 feet from Salsipuedes Street, with the third story portion of the hotel being situated on the north and northeastern portion of the hotel site.

Therefore, the hotel's proposed setbacks would meet and exceed the required setbacks established for Cabrillo Boulevard, but would not meet existing setbacks for Salsipuedes Street. Specifically, the one story portion of the proposed hotel would be 6.5 feet short of meeting the 40 foot setback required for single story structures and 41.5 feet short of meeting the 75 foot setback required for two story structures. There are also numerous other design conditions (i.e., landscaping requirements, architectural design review and view corridors/distance between buildings) contained within the Specific Plan that the proposed hotel is subject to and would be consistent with. Nevertheless, the height of the proposed hotel (45 feet) and the distance to Cabrillo Boulevard would still result in the obstruction of existing foreground views of the City's industrial area, as well as mid-ground and background views of the Riviera and Santa Ynez Mountains for approximately 410 linear feet along Cabrillo Boulevard. Because of the location (directly adjacent) of this vantage point to the park and hotel site, as well as the location of the park and hotel site to each other (contiguous), the assessment of the cumulative effects of the proposed hotel and park site on existing views observed from Cabrillo Boulevard is necessary. Therefore, the proposed 45-foot high hotel combined with the proposed park portion of the site's potential skyline trees would have the potential to block a large portion of the existing Riviera and mountain views observed through the adjoining park portion and hotel portion of the site (refer to the above park portion of the site view blockage assessment for additional information on potential park portion of the site impacts). As a result of the visually unappealing nature of the City's industrial area, the proposed hotel portion of the site's obstruction of foreground views observed from Cabrillo Boulevard would be considered a beneficial visual impact.

When viewing the park and hotel as a single entity the combined effects of the park's skyline trees and the hotel would result in the obstruction of existing Riviera and mountain views. Because existing Riviera and mountain views are considered a significant visual resource to the Waterfront Area, the combined view blockage of the proposed skyline trees and hotel would be considered significant. **Therefore, the combined effects of the proposed park's skyline trees and the hotel would result in a significant adverse visual impact to Riviera and mountain views observed from Cabrillo Boulevard.**

Vantage Point 2 - Chase Palm Park/Beach Area

Chase Palm Park and the adjacent beach area are highly utilized for recreational purposes and are also popular tourist attractions that are used by approximately 1,015,000 persons per year or 2,781 persons per day.[63] Although Cabrillo Boulevard (Vantage Point 1) is located closer to the site than Chase Palm Park, this vantage point is considered to be visually more sensitive than Cabrillo Boulevard as a result of the viewer's orientation and the duration of views. Figure VIF-4 provides a photograph of the site from Chase Palm Park. This vantage point which is located just south of the project site, between the Pacific Ocean and Cabrillo Boulevard, provides stationary views of the entire length of the site in the foreground, with limited portions of the Riviera and Santa Ynez Mountains in the mid-ground and background. Although existing views of the Riviera and Santa Ynez Mountains observed through the proposed park portion of the site are presently limited due to skyline trees, the proposed park portion of the site's landscaping would have the potential to further restrict existing Riviera and mountain views observed from Chase Palm Park. As mentioned above in Vantage Point 1, the park portion of the site's proposed landscape plan would entail the removal of 98 trees and the planting of 441 new trees (approximately 224 of the 441 proposed trees would have the potential to block views of the Riviera and mountains). **Therefore, skyline trees associated with the proposed park portion of the site would result in a significant adverse visual impact to existing Riviera and mountain views observed from the Chase Palm Park Vantage Point.**

Although the proposed hotel site is visible from nearly all locations within Chase Palm Park, one location directly south of the hotel portion of the site offers unobstructed, scenic views of the Riviera and Santa Ynez Mountains. Therefore, the following analysis of the proposed hotel's potential to obstruct existing views north of the project site is considered to be the worst-case viewing scenario from Chase Palm Park. This worst-case viewing location is situated directly south of the proposed hotel, approximately 10 feet south of Cabrillo Boulevard and just within Chase Palm Park (refer to Appendix F, View Corridors and Line of Sight Profiles, specifically view corridor A). The potential viewer at this location would be approximately 295 feet from the closest portion of the three-story hotel. Because the proposed hotel portion of the site is envisioned to be developed with Hotel Related Commerce (according to current zoning and specific plan designations), design conditions within the Specific Plan governing the hotel portion of the site were established in effort to reduce the potential for future development to result in significant visual impacts (refer to Vantage Point 1 - Cabrillo Boulevard, for discussion of Specific Plan design conditions). As mentioned above, the proposed hotel would be consistent with the design conditions required by the governing Specific Plan. Nevertheless, the proposed hotel would result in the obstruction of existing foreground views of the City's industrial area, as well as mid-ground and background views of the Riviera and portions of the Santa Ynez Mountains (refer to Figure VIF-5, Simulated Waterfront Hotel). Specifically, all elevations below 2,500 feet would be blocked from potential viewers located at this worst-case viewing location. Views observed from other locations within Chase Palm Park would not be obstructed to this high degree, as a result of the short linear distance (410 feet) of the proposed hotel and the viewer's orientation to the site. Although Riviera and mountain view blockage resulting from the proposed hotel would be limited to 410 linear feet, the combined effects of the proposed park portion of the site's new skyline trees and the proposed hotel would have the potential to obstruct all existing mid-ground/background view corridors observed through the park and hotel site. Views of the Riviera and mountains would be preserved by the existing view corridor presently established through Salsipuedes Street. **Therefore, the combined effects of the proposed hotel portion of the site and the proposed park portion of the site's potential skyline trees would result in a significant adverse visual impact to Riviera and mountain views observed from the Chase Palm Park Vantage Point.** As a result of the visually unappealing nature of the City's industrial area, the proposed hotel's obstruction of foreground

[63] Final Environmental Impact Report on the Fiesta Park Project, 1987.

FIGURE VIF-5

SIMULATED WATERFRONT HOTEL

SOURCE: **archiTREK**, January 1993

views observed from Cabrillo Boulevard would be considered a beneficial visual impact.

Vantage Point 3 - Stearns Wharf

This vantage point, situated approximately 3,000 feet from the proposed park and hotel site, is located on Stearns Wharf which is highly utilized by both tourists and residents. Stearns Wharf provides views of the entire site, as well as West Beach, Chase Palm Park, East Beach and the Santa Ynez Mountains. This vantage point enables the viewer to observe the shoreline in the fore-ground view, the proposed project site and Riviera in the mid-ground view and the Santa Ynez Mountains in the Background view.

As mentioned above, the proposed park portion of the site would not result in the development of any view blocking structures and the proposed vegetation would not have the size or mass required to obstruct existing views observed from this distance. Existing views of the Riviera and Santa Ynez Mountains observed through the proposed park portion of the site would not be obstructed or degraded by the proposed park portion of the site.

Because this vantage point is located approximately 3,000 feet from the project site, the proposed hotel would appear to the average viewer (non-architect) as an extension of the existing Red Lion Resort, which is located immediately east of the site. Although portions of the proposed hotel would be approximately 20 feet taller than the adjacent portion of the Red Lion Resort, the proposed hotel would utilize architectural styles and building materials (i.e., stucco walls, red tile roof) similar to those utilized by the existing Red Lion Resort. In addition, the proposed hotel would not restrict existing views of the prominent Santa Ynez Mountains or Riviera, as a result of the distance between the site and this vantage point. However, existing views of the unappealing industrial area located directly north of the site would be obstructed by the proposed hotel.

Because the proposed park would not result in any view blocking structures or vegetation and the proposed hotel would appear as an extension of the existing Red Lion Resort, the combined results of the park and hotel would be considered insignificant to views observed from Stearns Wharf. Therefore, the combined visual characteristics of the proposed park and hotel would not result in a significant adverse visual impact to views observed from Stearns Wharf.

Vantage Point 4 - Alameda Padre Serra

At the intersection of Alameda Padre Serra and Dover Road, just east of Brooks Institute, this vantage point offers spectacular mid-ground views of the City and background views of the Pacific Ocean. The majority of potential viewers utilizing this vantage point would be residents of the Riviera and students attending Brooks Institute. The project site is located at an elevation of approximately 5-10 feet above mean sea level (MSL), while this vantage point is situated approximately 450 feet above MSL. From this vantage point, located approximately 9,000 feet north of the park and hotel site, both the Red Lion Resort and the park/hotel site are visible. However, the large distance between this vantage point and the project site limits the viewer's ability to observe specific, detailed features of the site. For example, views of the site from this vantage point suggest to the viewer that the site is primarily covered with large skyline trees. Although large skyline trees are located throughout the site, views of the storage facilities, other vegetation or significant features of the site cannot be observed from this vantage point.

Because the majority of the large skyline trees located on-site would be preserved with development of the proposed park, alteration of existing views from this elevated vantage point would not result with development of the proposed park portion of the site. Visually from this vantage point, changes in the park portion of the site's existing character would be minimal, as a result of the large distance between the viewer and the site.

Because this vantage point is elevated substantially above the park and hotel site, existing views obstructed by the proposed three-story hotel would be minimal. The elevation of this vantage point also provides panoramic views of the Waterfront Area and Pacific Ocean, which results in the hotel portion of the site being a small portion of the view observed from this vantage point. As a result of the large distance between the site and the vantage point, as well as the expansiveness of the view, the proposed hotel would appear as an extension of the existing Red Lion Resort and Waterfront Area in general. Although the height of the proposed hotel would be approximately 20 feet taller than the adjacent portion of the Red Lion Resort, the distance and elevation of this vantage point reduces the viewer's ability to detect such height differences. However, the proposed hotel's roof top equipment (i.e., air conditioning unit, etc.) could potentially be discernible from this vantage point, as a result of the difference in colors between the red tile roof and mechanical equipment. Therefore, the proposed hotel's unappealing roof top equipment may be considered visually offensive if adequate measures to screen or blend the equipment with the roof are not utilized. Nevertheless, because of the distance between this vantage point and the proposed hotel, potential impacts would be adverse, but less than significant without screening of such equipment.
As a result of the large distance between this vantage point and the project site, the combined visual characteristics of the proposed park and hotel is considered insignificant. In addition, the elevation of this vantage point eliminates the potential for the park and hotel's combined effects to obstruct any significant views. Therefore, the combined results of the proposed park and hotel would not result in a significant adverse visual impact to views observed from Alameda Padre Serra.

2.2 Hostel Site

2.2.1 Anticipated Visual Change of the Site

The anticipated form of the project site would eventually consist of a two-story, 75 bed hostel with a landscaped courtyard and parking lot. According to the hostel site plan, development of the 23,978 square foot site would be comprised of the following components and building area totals:

- New building footprint total - 5,336 square feet (22.25% of total site area)
- Paving area total (parking lot, etc.) - 8,500 square feet (35.45% of total site area)
- Landscape/open space area total (includes courtyard) - 10,142 square feet (42.30% of total site area).

Development of the hostel on-site would require the removal of one existing large pine tree and three visually less prominent trees. The proposed hostel would also entail the planting of 8 new trees, which would includes a King or Queen Palm. The proposed hostel would be designed in Spanish architectural motif with light colored stucco walls and a red tile roof, which would be consistent with the architectural design of the immediate area. As previously mentioned, the site is presently vacant and in a visually degraded condition, which resulted from the removal of the previous Shell Station and remediation of contaminated on-site soils. It is anticipated that development of the proposed hostel would result in an increase in the visual character, quality and diversity of the degraded site, which would be considered a visual benefit because of the site's existing degraded condition. Therefore, the change in the site's existing visual condition to the anticipated future condition of the proposed hostel would not result in a significant adverse visual impact. In addition, the anticipated visual change would be considered a beneficial visual impact, because of the revitalization of the currently degraded site.

2.2.2 Removal or Degradation of Significant Aesthetic Resources

Loss of Visually Significant Trees

As illustrated on the proposed site plan, development of the hostel would entail the removal of four visually significant trees located on the southern boundary of the site. With the exception of the 6 existing trees located on the southern boundary of the site and the one palm tree located on the site's eastern boundary, the remaining portion of the hostel site is devoid of significant vegetation (refer to Figure VIF-6, for photographs of existing site condition). The proposed removal of 4 trees located on the southern boundary of the site would result in the removal of a significant aesthetic resource. However, because the proposed hostel would entail the planting of 8 new trees and landscaping which includes ground cover, shrubs and vines, the amount of visually significant vegetation located on-site would be increased. This increase in vegetation throughout the site would be considered a visual benefit to the existing condition of the site. Therefore, the applicant's proposed landscape plan would mitigate any loss of visually significant vegetation located on-site, and visual impacts associated with the removal of four trees would be less than significant.

Loss of Open Space

Although the hostel site is currently vacant, the open space character of the site is considered minimal because of the site's long history of development and the visual degradation that resulted from construction and demolition of previous businesses that occupied the site. Assessing whether or not the open space of a project site is considered a significant aesthetic resource is relative to the overall size of the site's open space and whether the open space is intended to be preserved as such. Because the hostel site is only 0.55 acres and is envisioned for Hotel and Related Commerce in the City of Santa Barbara's General Plan, the hostel site's open space is not considered a significant aesthetic resource. In addition, the site has been utilized for commercial use since the 1930's and the City's General Plan designates the site for continued commercial use in the future. Presently, the open space condition that exists is considered to be a temporary condition resulting from the removal of the previous businesses. Therefore, the temporary open space character of the site is not considered a visual resource and significant adverse aesthetic impacts associated with the redevelopment of this site would not occur.

2.2.3 Visual Compatibility of the Proposed Hostel With Surrounding Visual Character

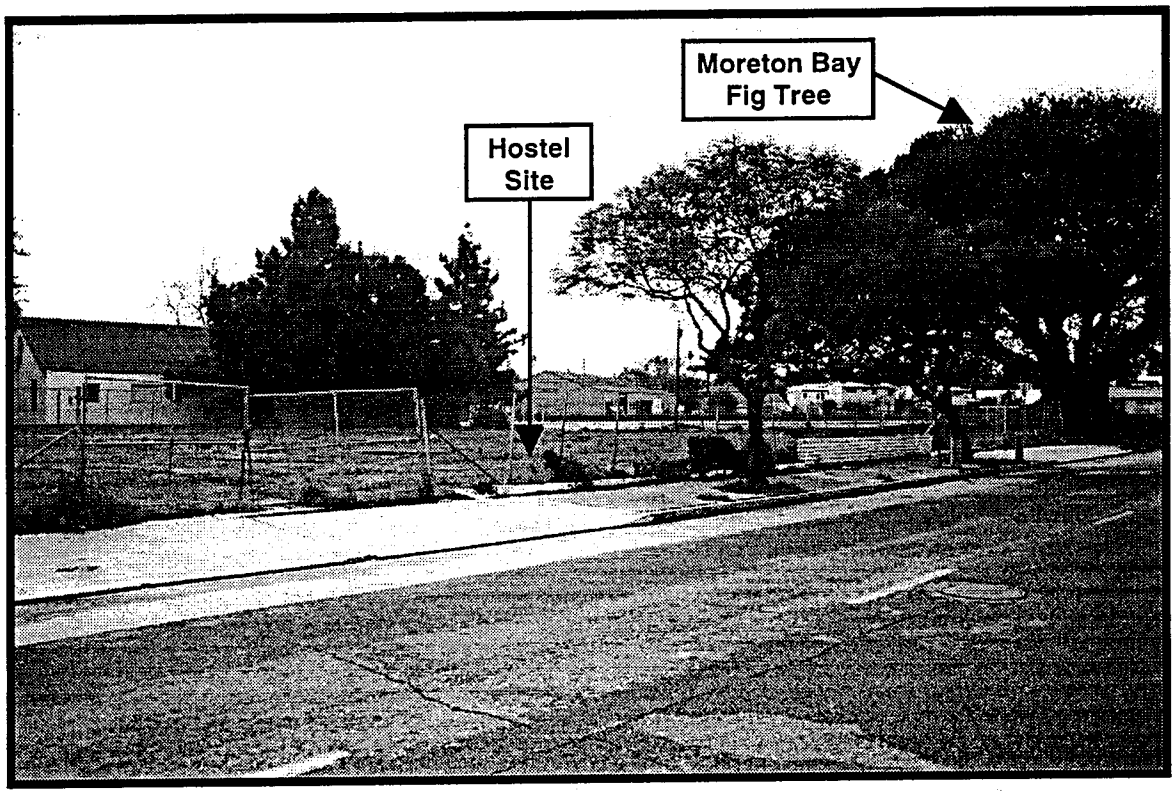
As previously mentioned, the proposed hostel site is situated on the eastern corner of Chapala and Montecito Streets, across from the Moreton Bay Fig Tree, at 33 W. Montecito Street. From a visual perspective, the proposed hostel would be compatible with the Spanish architectural motif of the existing structures located within the immediate vicinity. With regard to the size, scale and bulk of the hostel structure, the hostel is considered to be compatible with the structures within the visual vicinity. Specifically, the structures located within the visual vicinity of the hostel site consist of the following:

- Old Railway Express Building located adjacent to the southern boundary of the site - A one-story, Spanish style structure that is approximately 20 feet tall.

- Santa Barbara Railway Station located south of the site, adjacent to Railway Express Building - A two-story, Mission Revival style structure that is approximately 35 feet tall.

- The Neal Hotel located southeast of the site, directly east of the old Railway Express Building - A three-story, Spanish style structure that is approximately 50 feet tall.

Looking southeast from southbound U.S. Highway 101 (existing condition).



Looking southwest from Montecito Street (existing condition).

FIGURE VIF-6

PHOTOGRAPHS FROM VANTAGE POINTS OF HOSTEL SITE

INTERFACE

- The Gold Coast Cycles building located adjacent to the eastern boundary of the site - A one-story, Spanish style structure that is approximately 15 feet tall.

The proposed hostel would be designed in a Spanish architectural motif (light colored stucco walls with a red tile roof) and would have a maximum structure height of 26 feet above the existing grade. It is anticipated that the proposed hostel would be visually compatible with the surrounding architectural style, as well as the structural size of the nearby buildings. Therefore, significant adverse aesthetic impacts associated with the visual compatibility of the proposed hostel with surrounding structures would not occur.

With regard to the Moreton Bay Fig Tree located just west of the hostel site, the proposed hostel would be constructed with a courtyard oriented towards the large fig tree which would visually incorporate the unique tree into the hostel's landscaping. Therefore, development of the hostel would not result in any visual incompatibility with the scenic Moreton Bay Fig Tree.

2.2.4 Prominent Vantage Points

Because the majority of the existing views of the proposed hostel site are obstructed by existing development, vantage points which offer significant views of the site are limited. However, an existing significant view of the Moreton Bay Fig Tree could have the potential to be obstructed by the proposed hostel. Therefore, vantage points offering views of both the hostel site and the Moreton Bay Fig Tree are assessed below.
The vantage points described below were selected for impact analysis as a result of existing site and vicinity conditions, as well as the public's potential to observe the site from these public viewing locations. The locations of these vantage points are depicted in an Index Map provided in Figure VIF-3.

Vantage Point 1 - U.S. Highway 101 (Southbound Lanes)
This vantage point is located on U.S. Highway 101, which is situated parallel to the site, just north of Montecito Street. U.S. Highway 101 is heavily traveled and is the primary access route for vehicle traffic traveling north or south of Santa Barbara. Because of the large number of travelers utilizing U.S. Highway 101, views from this vantage point of the hostel site are considered significant.

This vantage point would provide southbound mobile viewers with unobstructed views of the site for approximately 10 seconds when traveling at the designated speed limit of 55 mph. Because U.S. Highway 101 is elevated approximately 5-10 feet above Montecito and Chapala Streets, views of the entire site are visible from this vantage point (refer to Figure VIF-6, Photographs from Vantage Points). Existing views from the southbound lanes of U.S. Highway 101 consist of the Moreton Bay Fig Tree, portions of the old Railway Express Building located adjacent to the site and the hostel site's large pine trees. However, the focal point of this viewshed is considered to be the prominent and unique Moreton Bay Fig Tree. Although the proposed hostel site is as visible as the fig tree, the limited amount of vegetation and the lack of other significant visual resources diverts the viewer's attention to the large fig tree. Development of the proposed hostel would further obstruct existing views of the old Railway Express Building, but would not obstruct or hamper existing views of the historic fig tree. Because the hostel would incorporate aesthetically appealing landscape and architecture into the views of the fig tree, the proposed hostel would be considered a visual benefit to this viewshed. Therefore, the proposed hostel would not result in significant adverse visual impacts to views observed from U.S. Highway 101.
Vantage Point 2 - Montecito Street (traveling in a westerly direction)
This vantage point is located directly north of the site on Montecito Street, between the State Street underpass and Chapala Street when traveling in a westerly direction. When traveling west on Montecito

Street, the Moreton Bay Fig Tree is highly visible and provides a significant scenic resource for viewers traveling the roadway. Therefore, views of the historic fig tree from Montecito Street are considered significant.

Because Montecito Street parallels the hostel site and the Moreton Bay Fig Tree, the potential for the proposed hostel to hamper views of the Moreton Bay Fig Tree may exist. In addition, the proposed development of the hostel would entail a modification of the required 20-foot front yard setback for two-story buildings located on Montecito Street. The applicant is requesting a modification to allow for a one-story element and entry trellis to come within ten feet of the property line located on Montecito Street. Therefore, the proposed setback modification would result in a 15 foot high, single-story portion of the hostel and a ten foot high entry trellis being located ten feet from the Montecito Street/hostel site property line. The 15 foot high, single story element would be approximately 74 linear feet, while the ten foot high entry trellis would have a length of approximately 16 feet.

Presently, the majority of the Moreton Bay Fig Tree is visible when traveling west on Montecito Street, between the State Street underpass and Chapala Street. Because the two-story portion of the hostel would be set back 20 feet from the Montecito Street property line, and the fig tree is located approximately 20 feet south of Montecito Street, the majority of the fig tree would remain visible from Montecito Street with development of the proposed hostel (refer to Figure VIF-6, Photographs from Vantage Points). Specifically, when traveling west on Montecito Street, between the State Street underpass and the Gold Coast Cycle's building, the two-story portion of the proposed hostel would result in view blockage of approximately 1/3 of the Moreton Bay Fig Tree (southern portion of tree). However, as the viewer continues to travel west on Montecito Street, between the Gold Coast Cycle's building and Chapala Street, views of the fig tree would be expanded. The expansion of fig tree views as the viewer travels west on Montecito Street, between Gold Coast Cycles and Chapala Street, is a result of the physical orientation of Montecito Street to the hostel site and to the fig tree (refer to Figure VIF-6, Photographs from Vantage Points). Because approximately 2/3 of the Montecito Street view of the Moreton Bay Fig Tree would remain with development of the proposed two-story structure, impacts would be adverse, but considered less than significant to views observed from Montecito Street.

With regard to the request to allow a setback modification along Montecito Street, the single-story portion of the hostel would block a small amount of existing views of the Moreton Bay Fig Tree (less than 10% of the tree). Because of the large height and size of the fig tree, as well as the physical orientation of Montecito Street, the placement of a 15 foot tall structure ten feet from the Montecito Street/hostel site property line would be considered insignificant. Therefore, modification of the existing 20 foot setback to allow a 10 foot setback from Montecito Street would not result in a significant adverse visual impact.

3.0 Mitigation Measures

3.1 Park and Hotel Measure

With regard to obstructing or degrading existing significant views, the combined effects of the proposed hotel and park site would result in significant adverse visual impacts on existing Riviera and mountain views observed from Cabrillo Boulevard and Chase Palm Park. Because the proposed hotel and park would be developed concurrently, the following mitigation measure would be required to reduce park and hotel impacts to insignificant levels.

- All of the existing views of the Riviera and Santa Ynez Mountains, which are presently obtained through occasional viewing corridors created by breaks in the park portion of the site's existing

skyline trees as shown in Figure VIF-1, shall be retained and not obstructed by the proposed skyline trees. This mitigation can be achieved by limiting the quantity of broad-massed skyline trees (i.e., Eucalyptus, Pinus radiata, etc.) proposed in the landscape plan and planting new trees in a clustered fashion in order to retain viewing corridors. Windrowing of skyline trees shall be strictly prohibited.

3.2 Hostel Measures

In that no significant adverse visual impacts have been identified with development of the proposed hostel, no mitigation measures are required.

3.3 Recommended Measures

3.3.1 Park and Hotel Measures

In order to further reduce adverse, but less than significant visual impacts from Vantage Point 4 (Alameda Padre Serra), which would result from mechanical equipment placed on the proposed hotel's roof top, incorporation of the following measure is recommended.

- All roof top equipment should be concealed from potential viewers. This measure may be achieved by orienting the equipment so it is concealed by roof top architecture, painting all equipment to match roofing tile or concealing the equipment within a roof top structure painted to match roofing tile.

4.0 Residual Impact Statement

Implementing the required mitigation measure would mitigate the park and hotel's combined effects which result in significant impacts on existing Riviera and mountain views observed from Cabrillo Boulevard and Chase Palm Park. Preserving all existing views of the Riviera and Santa Ynez Mountains observed through the proposed park portion of the site would ensure Riviera and mountain views on either side (east or west) of the proposed hotel. Therefore, incorporation of the mitigation measure required above would lessen park and hotel site visual impacts to less than significant levels.

It should be noted that the proposed park and hotel were designed to preserve the majority of the property to provide the largest amount of contiguous open space for park use. The preservation of the majority of the existing views would be achieved by locating the hotel on the eastern 3 acres of the 13 acre site, by restricting the third story of the hotel to the northern portion of the hotel site and by protecting the remaining view corridors as required by the above mitigation measure. Although clustering the commercial development (proposed hotel and associated facilities) on the eastern most 3 acres of the site provides the largest amount of contiguous park land, it requires the hotel to utilize a second and third story which obstructs existing Riviera and mountain views. If the proposed hotel were to be located along the northern boundary of the 13 acre site, the proposed hotel could be limited to one story and the obstruction of scenic Riviera and mountain views would not occur. However, the open space character of the proposed project site would be sacrificed if the proposed hotel were to be located along the northern boundary of the park and hotel site.

In addition, implementation of the above recommended mitigation measure would further reduce the potential for viewers at Vantage Point 4 (Alameda Padre Serra) to be adversely impacted by mechanical

equipment located on the proposed hotel's roof top.

Short-term unavoidable significant visual impacts would result with the removal of the park portion of the site's existing vegetation and construction of the proposed park portion of the site's elements. Short-term visual impacts would be reduced to levels of insignificance after the proposed landscaping has been established. Therefore, long-term significant visual impacts would not result from development of the proposed project.

G. BIOLOGICAL RESOURCES

1.0 Environmental Setting

1.1 Park and Hotel Site

Previous studies conducted of the project site include the "Botanical Survey for the Proposed Santa Barbara Waterfront Park Project" prepared by Katherine Rindlaub (June 11, 1992) and the "Tree Management Plan for Park Plaza/Waterfront Park" prepared by Bill Spiewak (no date). These reports have been incorporated by reference and pertinent portions are summarized in this section. These reports are available for public review in the Community Development Department at the City of Santa Barbara.

A survey was conducted of the project site on November 18, 1992. This survey was conducted by Jackie Bowland, senior biologist with Interface. The survey entailed walking over the entire site, generally criss-crossing the property to assure full visual coverage of the site. Binoculars were used to identify birds and butterflies in the trees. Specific attention was given to the identification of wildlife uses of the site and the presence of sensitive species of plants or animals. The plant list collated during the previous survey by Rindlaub was verified.

The project description and environmental setting sections of this EIR describe the previous land use history of the project site. These conditions include a biologically isolated parcel of disturbed open space, vegetated primarily with planted and volunteer non-native plants and surrounded by urban land uses including busy roadways and the railroad tracks. Laguna Channel and two small wetland areas occur on-site. Large portions of the site are nearly void of vegetation, such as the area in the eastern section adjacent to the existing Red Lion Resort Hotel, the area around the existing buildings and a section in the northwestern portion of the site, bordered by the railroad tracks and Santa Barbara Street. The entire site has received extensive alteration of both the water regime and topography, including the addition of fill material ranging from 3-6 feet in depth over most of the site.[64] Additionally, the site is regularly used by homeless people and there is litter and old bedding scattered throughout the site. Substantial night-lighting is present on and immediately adjacent to the project site along Cabrillo Boulevard, Santa Barbara and Salsipuedes Streets (street lights, car headlights), adjacent to the existing buildings along Carpinteria Street and surrounding the El Estero Wastewater Treatment Plant. In addition to the night lighting at the wastewater treatment plant, outdoor loudspeakers are used to announce information to the plant. This combination of conditions has resulted in generally low overall biological habitat values on this property.

1.1.1 Flora

The plant list compiled by Rindlaub (1992) and the tree inventory prepared by the project architects are included in Appendix G.

Approximately 186 mature non-native trees and shrubs occur on the site. The most common species are four different species of eucalyptus trees (Eucalyptus sp.) and myoporum (Myoporum laetum). On the project site, the myoporum have become large shrubs which line Cabrillo Blvd. Acacias (Acacia sp.), cypress (Cupressus macrocarpa) and palms (Phoenix sp.) comprise most of the remaining trees. Some of the trees are in poor health, either from drought stress, improper pruning in the past, or infection by fungus.

[64] "Preliminary Geotechnical Design Data and Proposed Park Plaza Development" prepared by Law/Crandall. Inc., June 3, 1992.

Appendix G contains a table illustrating the tree and shrub inventory and indicates the number of each species to be removed and retained. The tree understory is comprised of non-native grasses with occasional sapling trees and shrubs of the species listed above. Species diversity is low.

One sensitive plant species was identified as occurring on the site.[65] One population of cliff aster (Malacothrix saxatilis saxatilis) containing about ten plants was found near the railroad tracks among the eucalyptus trees. Although this plant is not listed by the California Native Plant Society, it is considered to be locally sensitive due to loss of habitat. This subspecies typically occurs on outcrops of Monterey shale within the coastal bluff scrub community. The population on-site is disjunct; that is, it is not within the habitat type that this subspecies is associated with. According to the Rindlaub report, this plant colonizes disturbed openings in the coastal area. It ranges from slightly west of Gaviota south to the Ventura County line, typically occurring along the immediate coast and occasionally occurring along road cuts and erosion gullies slightly inland, but not far from the coast. This subspecies has become uncommon between the Goleta and Santa Barbara areas because of loss of habitat and/or competition with non-native (exotic) species.

1.1.2 Fauna

During the November survey, no wildlife prints were seen within the muddy banks of either the creek or the wetland area. Domestic dogs, and domestic and possibly feral cats were the only mammals noted on-site. Because Laguna Channel does not provide wildlife movement opportunities (see discussion below), and because of the surrounding roadways and railroad tracks, only occasional use of this site by mammals is expected.

Birds noted on the project site during the November survey included mourning dove, Anna's hummingbird, white-crowned sparrow, European starling, and European house sparrow. Additional birds likely to occur on-site include species tolerant of human activity, such as mockingbird, scrub jay, great horned owl, red-tail hawk, house finch and various sparrows. The eucalyptus trees are likely to be used by migratory songbirds feeding on small insects; however, none were seen during the brief field survey.

The monarch butterfly is a locally sensitive migratory insect that occurs in low numbers on the project site during the winter, where it feeds on the nectar of the winter flowering eucalyptus trees and drinks from both the creek and the wetland areas. Approximately five monarch butterflies were seen during the November survey. The project site was included in a County-wide study conducted by William H. Calvert, a recognized butterfly expert who studies the migration patterns and behavior of the monarch butterfly.[66] The Calvert report states: "Historical reports indicate that monarchs once used this area for roosting. Apparently due to clearing of under brush, they no longer use the area as a roosting site (Calvert, 1991)."

1.1.3 Sensitive Habitats

Two surface water resources are present on the project site, within the area proposed for the park portion of the site. These include Laguna Channel and a wetland area. These resources are discussed separately below. Neither area is in a natural condition. Although surface water is usually a valuable resource for wildlife in the generally arid Santa Barbara region, these areas appear to receive little wildlife use.

[65] "Botanical Survey for the Proposed Santa Barbara Waterfront Park Project" prepared by Katherine Rindlaub, June 11, 1992.

[66] Monarch Butterfly Overwintering Site Locations in Santa Barbara County, California, by William H. Calvert, Dec. 1991.

Laguna Channel

Laguna Channel traverses the western portion of the site and the project plans include modification of the creek banks and restoration/revegetation. Upstream of the project site, Laguna Channel exists as a channelized, underground creek passing through the City of Santa Barbara in a concrete box culvert. It becomes an above-ground channel after passing under U.S. Highway 101. It enters the project site at the railroad tracks. The creek receives storm water and urban runoff, and the lower portion contains water year-round. The water quality in the above-ground portion of the creek is very poor, typically stagnant. A tide gate located on the south side of Cabrillo Boulevard prevents tidal flushing and contributes to (or causes) the stagnant conditions.

The creek banks are generally steep and vegetated primarily with non-native plants. (Non-native plants are indicated with an asterisk.) The dominant species present in and along the creek include giant wild rye* (Arundo donax), castor bean* (Ricinus communis), bulrush (Scripus robustus = S. robustus), California bulrush (S. californicus) and sedge (Cyperus eragrostis), with small amounts of watercress* (Rorippa nasturtium-aquaticum), duck weed (Lemna sp.) and brass buttons* (Cotula cornonopifolia) on or near the water. Fountain grass* (Pennisetum setaceum), sweet fennel* (Foeniculum vulgare), and pampas grass* (Cortaderia jubata) occur along the creek and in scattered locations throughout the site. These last three species, along with wild rye and castor bean, are considered by the Channel Islands Chapter of the California Native Plant Society to be highly invasive plants that should be eradicated from sites in the vicinity of natural areas, particularly along streams, which may inadvertently aid in the spread of these species by transporting seeds and providing moisture. This list of undesirable plant species is included in Appendix G.

Wildlife is not expected to use this creek because of the poor water quality and the lack of connection to other habitats. Common species of birds tolerant of urban conditions are expected to use the site in general, and may use the creek for drinking and bathing. Such species may include morning dove, rock dove, scrub jay, mockingbird, blackbird, starling and sparrows.

Wetlands

In addition to Laguna Channel, two other wetland areas are present on the project site. According to botanic surveys conducted by Katherine Rindlaub in 1991 and 1992, the wetlands occur in two distinct areas. One is a ditch to the east of Laguna Channel that forms an elongated "U" with the long segment generally parallel to Cabrillo Boulevard and the two ends perpendicular to Cabrillo Boulevard. These two ends coincide with two culverts that exit from Cabrillo Boulevard, apparently conveying surface water runoff from the street and possibly from Chase Palm Park. This drainage ditch occupies approximately 11,450 square feet (0.26 acre). The second area is a small swale at the eastern side of the park portion of the site that encompasses an area of about 504 square feet (0.01 acre). These wetland areas represent coastal brackish marsh habitat (Holland, 1986; Element Code 52200). Rindlaub's report describes the site as transitional from fresh to brackish water, with dominant native species including prairie bulrush (Scripus robustus = S. robustus), California bulrush (S. californicus) and sedge (Cyperus eragrostis). During the November 1992 site survey, Australian saltbush* (Atriplex semibaccata) was common in the vicinity of the wetland, primarily at the eastern end. However, non-native plants dominate both the wetland and the creek, including non-native grasses, eucalyptus trees* (Eucalyptus sp.), giant reed* (Arundo donax) and honeysuckle* (Lonicera japonica; Tecomeria capensis).

1.2 Hostel Site

The hostel site is presently vegetated with weedy introduced species. Because this site was previously a gas station, it contains little or no biological values. The only biological issue associated with the development

of this site is the location of an historically significant Moreton Bay Fig Tree. Figure III-5 in the Project Description section of this EIR illustrates the approximate location of the tree's canopy in relation to the proposed hostel facilities. The tree is located at the corner of Montecito and Chapala Streets and the canopy overhangs the proposed hostel site by approximately 20 feet. This tree is reported to be the largest of its species (Ficus macrophylla) in the United States. Planted as a seedling in its present location in 1877, the City of Santa Barbara has designated the tree an historic landmark. In 1991, a study was conducted for the City of Santa Barbara that analyzed the health of the tree and provided recommendations to ensure its continued well-being.[67] According to the tree report, the canopy spread is approximately 163 to 171 feet, with roots likely to extend beyond that distance another 20-40 feet. The report indicates that the tree appears to be in good health, but that it is not growing as quickly as it should be due to existing land uses within the canopy, such as paving and a lawn, and previous uses such as people camping under the tree. The report includes measures that should be taken to promote its continued health. These measures include removing paving, the lawn and any other compacted surfaces for an area extending 20 feet beyond the dripline. The report recommends that this area be maintained as bare soil and that mulch be added.

2.0 Impact Analysis

2.1 Park and Hotel Site

Construction of the proposed park and hotel site would result in the removal of primarily non-native trees and shrubs, non-native grasses and a small number of native annual herbaceous species of plants.

2.1.1 Flora and Fauna

Development of the proposed park portion of the site would result in the removal of primarily non-native grasses, shrubs and trees and the planting of many additional species of both native and non-native plants. According to the tree report prepared by the applicant's arborist, many of the trees to be removed are in poor health (Spiewak, no date). Less than significant impacts to both flora and fauna are expected to result from the construction and operation of the hotel and park site. This finding is based on the current low wildlife usage and values within the project site and the anticipated level of human activity within the developed park portion of the site.

One population of the sensitive plant, cliff aster, could be affected by project development, either through direct removal of the plants or through the indirect loss of suitable habitat. **These impacts would be considered significant and adverse.**

Beneficial impacts may result if wildlife use in the park portion of the site increases because of the increase in plant species diversity that would occur once landscape vegetation has become established and because of the presence of year-round surface water resources. However, this benefit would be tempered by the number of people using the park and the type of activities. Wildlife use of the park portion of the site is expected to be highest during the winter, when human use is expected to be lowest, and when many migratory birds as well as limited numbers of monarch butterflies utilize mature trees for resting and feeding.

[67] "Moreton Bay Fig Santa Barbara, California" prepared by John Britton & Denice Froehlich, November 1991.

2.1.2 Sensitive Habitats

The three proposed water elements planned for the park portion of the site would include Laguna Channel, The Lagoon and the creeks at The Wilds (refer to Project Description). These created water elements would be fed by a combination of potable and reclaimed water, chlorinated to meet state health standards. Each of these created elements would be physically separated from the existing surface water sources of Laguna Channel and the existing wetlands, to prevent the chlorinated waters associated with the created water elements from entering the existing habitats. Water from the created water elements within the park portion of the site could enter the existing waters of Laguna Channel and the wetlands only during periods of extremely high floods, referred to as 100 year floods (i.e., a flooding event with a statistical recurrence interval of 100 years or that has a one percent chance of occurring in any given year).

Laguna Channel
The project plans include alteration of the creek to create banks with a maximum slope of approximately 3:1. The recreated slopes would then be revegetated with native riparian and wetland species appropriate for the site. (A specific plant list has not yet been created.) No other alteration of Laguna Channel is proposed. Because the proposed project would result in cleaner water within Laguna Channel, the removal of invasive non-native plants and the planting of additional native and non-native plants, impacts to the creek would be either less than significant or beneficial.

Wetlands
The project plans include the restoration and revegetation of the wetland areas using native riparian and wetland plant species. The grading plans prepared by the project engineer indicate that approximately 600 square feet of the small wetland area located on the eastern portion of the site would be demolished during construction of the proposed project. The project design would retain, enhance and enlarge the remaining wetland area (approximately 11,450 square feet) by approximately 3,000 square feet.[68] The Rindlaub report states that mitigations are usually required at a ratio of 3:1 in high quality wetlands and may be reduced to 1:1 for severely degraded wetlands. Although the wetlands on-site would be considered severely degraded, the proposed project design would satisfy either ratio and impacts to this resource would therefore be less than significant.

2.2 Hostel Site

Comparison of the proposed development plans and the existing canopy of the Moreton Bay Fig Tree indicates the possibility of the tree's roots extending into the northwest corner of the building and courtyard. Disturbance of substantial roots could result in an adverse impact to this tree. However, based on a telephone interview with the City's arborist, Dan Condon, it is unlikely that important roots underlie the hostel project site.[69] Mr. Condon monitored the construction of utility trenches built in Montecito and Chapala Streets during construction of the cross-town freeway and stated that he did not recall observing roots within these approximately 10 foot deep trenches. This evidence, coupled with the previous disturbances to the project site during site remediation of the gas station, indicates that adverse impacts to the root system of the Moreton Bay Fig Tree are unlikely to result from construction of the proposed hostel.

Indirect impacts to the fig tree could result from occupancy of the hostel if increased public usage of the area under the tree's canopy occurs. This had been a problem prior to completion of the cross-town

[68] "Botanical Survey for the Proposed Santa Barbara Waterfront Park Project" prepared by Katherine Rindlaub, June 11, 1992.

[69] Personal communication with Dan Condon, City of Santa Barbara Arborist, February 17, 1993.

freeway, with people camping under the tree, damaging the bark on the exposed surface roots and carving into the tree's trunk. The concern is the potential reduction in the tree's health caused by soil compaction within the root zone, damage to the surface buttressing roots from foot traffic and damage to the trunk. The potential significance of this impact would be directly related to the number of people using the area under the tree, which would be anticipated to change throughout the year, and their actions while there. Given the close proximity of the fig tree to the entrance of the proposed hostel and the City's concern with the ongoing health of the tree, it would be easy to monitor people's activities. Therefore, the construction and operation of the proposed hostel is expected to result in a less than significant impact to the Moreton Bay Fig Tree.

3.0 Mitigation Measures

3.1 Park and Hotel Site

Because no significant adverse impacts to biological resources are expected to result from the construction and use of the proposed hotel portion of the site, no hotel mitigation measures are required. However, development of the proposed park portion of the site would result in a potentially significant adverse biological impact on one population of a sensitive plant. Therefore, the following mitigation measure is required.

- To mitigate the loss of the small colony of approximately ten cliff asters, the applicant shall include this species in the landscape plan for the area along the northern perimeter of the project site within areas containing Monterey shale. This should be achieved through a combination of both propagation of these plants from seeds collected from the population on-site and transplanting of the existing plants. This species is attractive when in flower, and the applicant should consider placing educational placards which would identify the plant.

3.2 Hostel Site

Because no significant adverse impacts to biological resources are expected to result from the construction and use of the proposed hostel, no mitigation measures are required.

3.3 Recommended Mitigation Measures

3.3.1 Park and Hotel Site

The following measures are recommended to both reduce potential impacts and to enhance biological resources present within the proposed park portion of the site.

- The proposed project includes the creation and/or restoration of approximately 3,000 square feet of brackish marsh wetlands. The planting plan for this area includes native wetland plants such as California bulrush and frankenia. Because only 600 square feet of wetland are estimated by the project engineer to be disturbed during construction, this would more than satisfy the restoration ratio of 1:1. No further mitigation measures would be required.

- The landscape plan should avoid the use of invasive non-native species in areas adjacent to Laguna Channel and the wetlands. Appendix G contains a list of plants considered to be invasive by the Channel Islands Chapter of the California Native Plant Society. This list should be used to guide

the selection of landscape materials for areas adjacent to native (or restored native) habitats.

3.3.2 Hostel Site

Potential indirect impacts could result to the adjacent Moreton Bay Fig Tree from guests staying at the youth hostel. The City of Santa Barbara Arborist shall be responsible for monitoring the activities of visitors within the canopy of the Moreton Bay Fig Tree. In the event that excessive use of this area results in unacceptable damage to the tree, the City should consider removing the existing lawn area and adding fencing as methods of discouraging public use under the tree. The City's arborist shall be the authority on assessing damage and determining corrective actions in regard to potential impacts to this tree. The City's Parks and Recreation Department and/or the hostel operators should consider preparing an informational sign or brochure that describes the historic and aesthetic importance of the Moreton Bay fig tree, and requesting visitor's cooperation in preserving and protecting the tree. The phone number of the City's Parks and Recreation Department and/or Police Department should be included to enable the public to report detrimental activities adjacent to the tree.

4.0 Residual Impacts

No residual impacts to biological resources are anticipated to result, given incorporation of the recommended mitigation measures described above.

H. RISK OF UPSET

1.0 Background and Environmental Setting

The proposed Park and Hotel site is located adjacent to the Southern Pacific Railroad tracks, between the Milpas and Santa Barbara Street crossings (located approximately 1,000 feet to the east and west of the site, respectively). There are three rails in this vicinity, one for northbound trains, one for southbound and one for local freight collection from spurs. Thus, opposing direction traffic is separated onto different rails. Eight passenger trains pass this area daily and six freight trains utilize this stretch of track daily[70]. Approximately five years ago a major fire occurred in a rail tunnel by San Luis Obispo and most freight traffic has since been permanently routed to central valley tracks due to the discovery that this route was more economical. South Coast freight and two other freight services use this track for transportation.[71]

The proposed youth hostel site is located approximately 150 feet northwest of the Southern Pacific Railroad tracks. There are two sets of tracks in this vicinity; therefore, northbound and southbound trains travel on separate tracks. As noted above, eight passenger trains and six freight trains utilize this stretch of track daily.

The Initial Study for the project raises two concerns due to the proximity of both the park and hotel site and the youth hostel site to the Southern Pacific Railroad tracks. One is related to the fact that the park and hotel site would generate a large number of people who would come to on-site uses and attractions. Secondly, both the 75 bed youth hostel and the 150 room hotel are uses which would result in large numbers of people being exposed to a potentially hazardous situation if a train accident were to occur in the vicinity of the project.

2.0 Applicable Thresholds

The City presently has no thresholds which apply to "risk of upset." For this reason, the County of Santa Barbara Thresholds have been used, which dictate that the significance of a potential accident is calculated as a product of the frequency and severity of the accident. Using the numerical values assigned to each category of frequency and severity, the following general classification applies:

Level of Impact	(Frequency X Consequence) Product
Low Significance	1 to 5
Moderate Significance	6 to 10
High Significance	11 to 25

Additionally, a more subjective assessment of accidents can be made. For example, a significant accident could be one with a moderate or high severity but with a likely or certain occurrence. A high severity accident with a remote frequency would not be considered significant due to the very unlikely possibility of its occurrence.

70 Personal communication with Doug Wubbena, Southern Pacific Transportation Company, December 1992.

71 Final Environmental Impact Report, Fiesta Park Project, 1987.

3.0 Project Impacts

The process of risk analysis involves the formulation and/or identification of potential "design" accidents. Once a particular accident is identified, the potential for its occurrence must be evaluated in terms of frequency (i.e., how often it might be expected to occur) and severity (i.e., what is the extent of physical damage from such a postulated accident). The terms and definitions used in risk analysis are provided in Table VIH-1 below.

Table VIH-1
Definition of Risk Assessment Terminology

FREQUENCY OF OCCURRENCE			
Rating	**Title**	**Frequency per Year**	**Description**
1	Virtually Impossible	$<10^{-6}$	This type of event has never occurred, but conceivably could.
2	Remote	$>10^{-6}$ $<10^{-4}$	Such events have occurred on a worldwide basis, but only a few times.
3	Unlikely	$>10^{-4}$ $<10^{-2}$	Accident occurs, but not likely here within facility lifetime.
4	Likely	$>10^{-2}$ <1	Likely to occur during the facility lifetime.
5	Virtually Certain	>1	Can be expected to occur more than once per year, on the average.

SEVERITY OF CONSEQUENCE		
Rating	**Title**	**Description**
1	Negligible	No effect on the health or welfare of any resident, tenant or patron of the development; negligible to minor damage to the development.
2	Minor	No serious injuries or loss of life to any resident, patron or tenant of the development; some damage to development, little or no loss of revenues from operation of most of the development.
3	Serious, but Confined	Possible serious injuries or loss of lives to some employees, residents and patrons of the development; possible moderate damage to components of the development and temporary displacement of tenants.
4	Severe	Injury or loss of life to many tenants, employees and patrons of the project, limited injury and loss of life to general public in surrounding areas; substantial damage to development, possible serious environmental damage.
5	Catastrophic	Substantial loss of life to general public; development virtually destroyed, inhabitants of development decimated; extreme, irreversible and non-mitigatable environmental damage.

Specifically, this section is intended to address the risk of upset from a potential train accident on the Southern Pacific Railroad track adjacent to the proposed Waterfront Park, Hotel and Hostel Project. The three types of rail accidents postulated are: 1) train/automobile collision; 2) collision between oncoming trains (opposite direction); and 3) train derailment. The frequency, severity and assigned significance of

each will be discussed below.

3.1 Frequency of Occurrence

The nearest automobile rail crossings to the proposed Park and hotel site are located approximately 1,000 feet to the east and west of the project site, at Milpas and Santa Barbara Streets. The nearest automobile rail crossing to the proposed hostel is located approximately 150 feet to the southeast, at Chapala Street. These crossings have warning lights and safety gates which are automatically activated when a train passes. Given the low speed of trains passing these points (20-30 miles per hour; passenger trains slow for a station stop while freight trains normally traverse the entire Santa Barbara area at this speed) and the existence of safety gates, the frequency of a train/automobile collision would be estimated to be in the "unlikely" range (no more frequently than once every 100 years; rating of 3).

In the vicinity of the park and hotel site, three tracks are provided for train traffic. This allows for the separation of trains traveling in opposite directions to different tracks. The frequency of a train/train collision on these tracks is therefore "remote" (rating of 2). Similar to the tracks near the park and hotel site, there are two sets of tracks in the vicinity of the proposed hostel allowing for the separation of northbound and southbound trains. Because of the separate tracks, the frequency of a train/train collision is also considered "remote" (rating of 2) in the vicinity of the hostel.

The Risk of Upset Analysis completed for the Chevron Bluffs project in Carpinteria[72] included evaluation of train derailment accidents on the tracks adjacent to the Carpinteria Bluffs Project and Chevron Gas Processing Facility. After extensive review of Railroad Safety records, National Fire Protection Agency reports on train accidents and a Liquid Container Derailment Study prepared for the National Railroad Administration, the report concluded that an earthquake would be the most likely cause of train derailment. The conditions at the park and hotel site and the hostel site are similar to Carpinteria, although some aspects provide for somewhat greater safety in this instance: the tracks are flat in the vicinity of both the proposed sites and are relatively straight for 2.5 miles; train speeds are low and opposing direction train traffic adjacent to the park and hotel site is on separate tracks. Therefore, the frequency of train derailment calculated for this region, based upon the frequency of occurrence of a sufficiently strong earthquake in the region, is between 10^{-4} and 10^{-6} per year. This puts train derailment in the "remote" category (rating 2).

3.2 Severity of Consequence

An automobile/train collision would involve the engine of the train coming into contact with a single automobile. Given the extensive line of sight along the railroad tracks in the vicinity of the project, the existence of safety gates and signals at crossings and the low speed of the approaching train, any collision would occur at relatively low speeds and would not involve occupants in the car (the car would be abandoned before impact occurred). Such a collision would not be anticipated to cause derailment of the train or injury to any passengers of the train. This type of accident would also not be anticipated to affect persons associated with either the park and hotel site development or the hostel site development any more than other residents of Santa Barbara and could occur regardless of whether or not the project is developed. The severity of the accident would therefore be placed in the "negligible" category (rating 1), in that direct damage to either development would not occur from this type of accident.

[72] Systems Safety Analysis Chevron Carpinteria Facilities and Carpinteria Bluffs Area I Project, Reese-Chambers Systems Consultants, December 1985.

Derailment of a passing train or a train to train collision could have two immediate effects: 1) some of the train cars could come in direct contact with structural components of the hotel or the hostel, causing physical damage; and 2) should hazardous material be involved in the derailment, release of these materials into the environment could cause environmental damage or a threat to public health. With regard to the hotel portion of the site, the first effect would likely be restricted to the approximate 10-12 foot noise abatement wall and the hotel rooms along the northern perimeter of the hotel. Both of these components are located within 80 feet of the tracks, which is the limit of most train derailment events. It is unlikely that total destruction of either of these components would occur given the low speed of the train. The hostel is at least 150 feet away from the northbound tracks and is therefore out of the 80 foot range. It should also be noted that there are existing structures which separate the southern and eastern sides of the hostel from the train tracks (i.e., Open Air Bicycles, Railway Station, California Hotel). If a northbound train derailed, these latter structures would receive the first impact. With regard to the second effect, release of hazardous materials, the extent of the accident would be classified as "serious but confined" (rating 3). The relatively flat terrain, absence of a steep embankment and slow speed of train travel through the project areas provide for an environment which should minimize the potential for catastrophic release of hazardous materials (i.e., extensive tank rupture, etc.), resulting in a slow and somewhat manageable release of these materials. Evacuation of residents, tenants and patrons of the proposed development and surrounding areas would be likely in this event.

Table VIH-2

Significance of Postulated Accidents			
Type of Activity	**Frequency**	**Severity**	**Product**
Train/Automobile	3	1	3
Train Derailment and Train/Train	2	3	6

Based upon the methodology and criteria discussed in this section, a train/auto collision would have a "risk product" of 3 with reference to the Waterfront Park, Hotel and Hostel Project, while a train derailment would have a "risk product" of 6. Train/automobile collisions would fall into the "low significance" category and would, therefore, be considered adverse but not significant. **On the other hand, train derailment would fall into the lowest range of the "moderate significance" category, constituting a potentially significant safety impact.** However, this conclusion, in effect, is equivalent to a "worst case" analysis, in that such an event has a "remote" possibility for occurrence at this location. The magnitude of the earthquake which would be required to cause derailment of the train would likely produce greater and more far reaching damage itself, than would the train derailment.

3.3 Salsipuedes Extension

As discussed in the Traffic and Circulation Section, VI. A., one of the mitigation measures that is planned to reduce traffic impacts is the extension of Salsipuedes Street through to the lower east side of the City. The Salsipuedes Street extension includes construction of an at-grade crossing over the railroad tracks. The engineering and construction division of Southern Pacific Transportation Company will enter into a contract maintenance agreement with the project applicants and will be conducting all construction-related services for the at-grade crossing and signal installation within the Southern Pacific easement area, which extends fifteen feet on either side of the railroad tracks. A Southern Pacific Transportation Company

monitor will be on-site at all times while the Salsipuedes Street extension work is being completed[73]. While the Public Utilities Commission will be required to approve the final plans for the signal and crossing, they have no jurisdiction for maintenance or construction of the at grade crossing.[74]

Construction of the at-grade crossing at Salsipuedes Street could create short-term construction related and long-term operational impacts. Each of these potential impacts are discussed below.

3.3.1 Short Term Impacts

Development of the extension could create short-term, construction-related safety risks to construction workers working in close proximity to the tracks. According to SPTC, this type of construction-related accident is virtually non-existent due to the precautions taken during construction of crossings.[75] While the SPTC does not have statistics on the frequency or severity of the types of accidents that can occur during construction, there is the remote possibility that these impacts could occur. Therefore, SPTC was contacted to determine the types of standard safety techniques that are used to ensure construction worker safety. First, all SPTC maintenance and construction crews go through standard Occupational Safety and Health Administration (OSHA) training. Workers take on-going safety courses which are updated annually. Other standard procedures include providing on-site workers with hand-held radios connected to the central control station to warn for approaching trains. If a train is coming, construction temporarily halts and all workers leave the vicinity of the tracks. Construction is scheduled around the train schedule as much as possible. Prior to commencement of construction activities, workers are made aware of the train schedule and take special precautions for safety near the tracks. Furthermore, in addition to the radio dispatches from the central control SPTC office to the workers, bell signals are sounded as a second warning signal to workers. With these precautions, accidents during construction would be considered remote and less than significant.

3.3.2 Long Term Impacts

In addition to potential short-term impacts associated with the at-grade construction, there is the potential for long-term risk impacts associated with the life of the railroad crossing. Accidents between automobiles or pedestrians going through the signal could occur. The SPTC does have statistics on the frequency of these events over the course of the past two years. According to SPTC, 99% of all accidents which occur at the at-grade crossings involve vehicular traffic and trains. There were 166 vehicular and 6 pedestrian at-grade crossing accidents on SPTC tracks in California between 1991-1992.[76] Vehicular accidents include bicycles, trucks and automobiles. Given that there are 4,438 SPTC at-grade crossings in California[77], this number of accidents is not considered to be significant. It should be noted that many at grade crossings are rural and/or private and the standard precautionary warning installations are not in place.

Standard precautions taken against such events include installation of the lights, bells and signal arm which

[73] Personal communication, Mr. Jim Balmer, Southern Pacific Transportation Company, February 25, 1993.

[74] Personal communication, Jack Ochi, City Public Works Department, February 24, 1993.

[75] Personal communication, Mr. Lawton McDowell, SPTC Safety Department, Denver, Colorado, February 26, 1993

[76] Personal Communication, Carol Anvari, Southern Pacific Transportation Company Accidents Division in San Francisco, March 1, 1993.

[77] Personal communication, Bob Prince, Engineering Department, Southern Pacific Transportation Company, March 8, 1993.

are activated prior to the arrival of a train. According to SPTC, the signal system is on an electrical backup system that is fail proof. The signal arm, lights and bells are activated automatically from the SPTC central control room. According to SPTC, there is never a situation where the system is not activated. There have been times when the system is activated and there is no on-coming train, but even this situation is rare.[78]

Development of the at-grade crossing for Salsipuedes Street would require abandonment of the Chapala Street crossing. SPTC is reluctant to add anymore at-grade crossings due to the safety and traffic impacts. Therefore, the addition of the Salsipuedes Street at-grade crossing would "replace" the Chapala at-grade crossing. Since the same number of local at-grade crossings would exist in the immediate vicinity of the project sites, there would be no alteration of risk-of-upset impacts with relocation of the Chapala Street at-grade crossing to Salsipuedes Street. The reader is referred to the previous discussion of automobile/train collisions earlier in this section for more information.

4.0 Policy Framework

The Conditions of Approval adopted as part of Specific Plan No. 1 contain several items aimed at reducing the risk of upset. The following discussion highlights these conditions.

Fire, Security and Safety Protection - A complete disaster evacuation and safety plan shall be reviewed and approved by the Fire Chief. Said plan shall include, but not be limited to, the following.

- *Smoke detectors in all commercial areas, units, guest rooms and work spaces.*
- *Fire alarm system that is regularly tested and designated to be reliable during all adverse circumstances.*
- *Sprinkler systems where determined to be necessary.*
- *Posted safety procedures and evacuation routes throughout.*
- *An evacuation and safety plan to include flood, fire, earthquake, hazardous materials, and tsunami disaster warning.*
- *Adequate fire flow pressure as required by the Fire Chief shall be provided.*
- *Building materials shall be fire resistant and designed to minimize fire hazards due to earthquakes or other natural disasters.*
- *Security systems shall be provided, and such plans shall be approved by the Police Chief.*

The applicant has proposed to incorporate several of the above Conditions in the proposed project. However, until such time as all Conditions are implemented, the project would be considered inconsistent with these Conditions.

[78] Personal communication, Bob Prince, Engineering Department, Southern Pacific Transportation Company, March 2, 1993.

5.0 Mitigation Measures

In that potentially significant adverse impacts have been identified, the following measures would be required for implementation.

- An Emergency Response Plan shall be formulated by the developer and approved by the Fire and Police Departments which addresses evacuation of the development (at both the park and hotel site and the hostel site) in the event of a train derailment or release of hazardous materials from a train car(s).

- Safety procedures and evacuation routes shall be posted throughout the development (at both the park and hotel site and the hostel site) and a "safety coordinator" shall be designated for the development to provide efficient interaction with emergency personnel in the event of an emergency and to ensure that safety programs are properly designed and maintained. Such an individual(s) shall know the location and function of all emergency systems in the development (at both the park and hotel site and the hostel site).

- The development (at both the park and hotel site and the hostel site) shall be constructed with fire retardant materials and shall have smoke detectors uniformly installed throughout the hotel and hostel areas and any interior habitable spaces in the park.

- Fire sprinkler systems shall be installed where code and the Fire Chief indicate they are necessary, with special emphasis on the areas of the development (at both the park and hotel site and the hostel site), which are located immediately adjacent to areas which could be directly impacted by train derailment.

- The rear wall of the fire lane area shall be designed and constructed in a manner which provides for the optimum resistance to damage from train car collision (some flexibility in the supporting members would probably be desirable) and primary structural support for hotel areas should be provided principally in the central and southern portions of the site (in the event that the rear wall is heavily damaged, these structures should have their primary support at other points not anticipated to be damaged from train car derailment).

- The proposed project shall comply with all Specific Plan Conditions relative to Risk of Upset as noted in the Policy Framework section above.

6.0 Residual Impact Statement

The above mitigation measures are designed to limit damage to the proposed project and to prepare future patrons of the development to react in the case of an emergency related to railroad operation on the Southern Pacific Railroad adjacent to the project. It is acknowledged that the Fire and Police Departments would experience adverse impacts in the event of a train derailment due to the probable need for evacuation and other emergency measures. However, there are no means to reduce the likelihood of a train derailment event if there were an earthquake or similar freak occurrence, and so the impact on emergency service personnel from the project would remain adverse.

I. HAZARDOUS MATERIALS/WASTES

1.0 Background and Environmental Setting

1.1 Definitions and Regulatory Setting

A hazardous material or waste is any substance which possesses qualities or characteristics that could produce physical damage to the environment and/or cause deleterious effects upon human health. A material or waste may be classified as hazardous if it has any of the following properties: flammable, combustible, explosive, corrosive, strongly oxidizing, strongly acidic or basic (extreme pH value), toxic, radioactive, etc. Due to these qualities, hazardous materials and wastes require careful handling (i.e., use, storage, disposal, etc.) in order to avoid potential damage or injury. Hazardous wastes are substances of no further intended use which need treatment or disposal, or both, while hazardous materials include new and usable substances (such as fertilizers or pesticides).

Incidents of environmental contamination and human injury or death associated with hazardous materials have created a public awareness of the potential for adverse effects from careless handling and/or use of these substances. Consequently, a number of federal, state and local laws have been enacted to regulate the management of hazardous materials. Five pieces of legislation are of particular interest here: the federal Resource Conservation and Recovery Act (RCRA), the state Hazardous Waste Control Law (HWCL), the Federal Clean Water Act (CWA), the California Porter-Cologne Water Quality Control Act (Porter-Cologne) and the state Hazardous Materials Management Act (HMMA).

RCRA requires, among other things, that each facility which generates hazardous wastes must obtain a generator permit from the U.S. Environmental Protection Agency (EPA). All hazardous waste haulers must also be permitted, as well as every hazardous waste disposal facility. A manifest document for each waste product must be completed and filed with the EPA before such waste leaves the generator site. In this manner, the EPA can "track" hazardous wastes from the generator site to ensure that they are properly disposed of in a certified disposal facility.[79] RCRA provides a broad requirement for the clean-up or remediation of contaminated property and the level to which contamination must be removed from soils is most commonly the threshold limit for the contaminant of concern, as specified in RCRA (even if the remediation effort itself is not directly regulated by RCRA).

HWCL is the California equivalent to RCRA. The passage of the original HWCL predated RCRA, and served as an important example for the later federal legislation.[80] It is important to note that while HWCL is substantially consistent with RCRA, it provides more stringent controls in certain instances, such as the identification of additional materials considered to be hazardous. The California Department of Toxic Substances Control (DTSC) has the primary enforcement authority for RCRA within California and for HWCL. The local enforcement of these two laws is generally provided by county governments through a

[79] In order for the Act to be applied, RCRA contains a comprehensive definition of "hazardous wastes," which is comprised of lists of hazardous wastes subject to regulation, either by virtue of their generation source or their contaminant content. Any waste material which contains a listed contaminant above "threshold" concentrations is considered a hazardous waste and such waste is subject to the treatment and disposal requirements contained in RCRA. The threshold concentrations or limits are based upon health risk information and are designed to protect public health by restricting public exposure to wastes with unhealthful levels of contamination.

[80] The U.S. EPA has primary enforcement authority for RCRA; however, the EPA grants this authority to each state which adopts a substantially similar program (substantially similar means that the program must be at least as stringent as RCRA). The HWCL was recently amended to provide substantial consistency with RCRA and California assumed primary enforcement responsibility within the State for RCRA in August 1992.

Memorandum Of Understanding (MOU) with the DTSC. In Santa Barbara County, the Environmental Health Services (EHS) Department has been granted local enforcement authority.

In 1948, Congress enacted the original Federal Water Pollution Control Act, which has been amended and expanded importantly over time to embody the major pollution control and water quality management laws in the U.S. The complete package of inter-related legislation is referred to as the Clean Water Act. The CWA protects surface water quality through limits on pollution discharges from various sources, including run-off from facilities where hazardous materials or wastes are present. A related piece of federal legislation is the Safe Drinking Water Act (SDWA) which is designed to ensure that public groundwater supplies meet certain minimum quality standards.[81] The U.S. EPA has primary enforcement authority for the CWA and SDWA, but assigns this authority to each state which adopts a substantially similar program at the state level.

In California, comprehensive regulation of surface water and groundwater quality is provided through the Porter-Cologne Act. Porter-Cologne has been deemed substantially similar to the CWA and SDWA and, therefore, California has been granted the primary enforcement responsibility for these Acts within the State. The State Water Resources Control Board (SWRCB) maintains regulatory authority for Porter-Cologne, CWA and SDWA. Enforcement of these laws is carried out by nine subsidiary Regional Water Quality Control Boards (RWQCB). Santa Barbara County falls within the jurisdiction of the Central Coast RWQCB which is headquartered in San Luis Obispo.

HMMA requires that any business which handles hazardous materials greater than specified threshold quantities (500 pounds of a solid material, 55 gallons of a liquid or 200 cubic feet of a compressed gas stored at any one point in time) must prepare a "Business Plan". It does not appear likely that proposed activities of the Waterfront Park, Hotel and Hostel would require formulation of a business plan. Review of the project by Santa Barbara County Environmental Health Services would determine such a need.

1.2 Existing Conditions

1.2.1 Parker Family Trust Property

The Parker Family Trust (PFT) property is comprised of two parcels (APN 17-010-36 and -42) totaling approximately 7.9 acres. The PFT property was occupied by the former Ice House structure and currently includes one small warehouse/office and is also used as an outdoor storage lot. Items stored on the lot include construction materials, commercial fishing equipment (e.g., nets, buoys, lobster traps) and a variety of heavy equipment or vehicles (e.g., bus, camper, trucks, trailers). Present and historic activities on the property have involved substances which are designated as hazardous and, therefore, contamination may be present on the site.

Dames & Moore prepared a Phase I Investigation, or Preliminary Site Assessment, of the PFT property in March 1992 to address the potential for contamination to be present on the site.[82] The Phase I Investigation

[81] The SDWA establishes acceptability criteria for drinking water in the form of Maximum Contaminant Levels (MCL) for a variety of pollutant substances. In order for a groundwater supply to be considered safe for human consumption, it must not have any pollutant in a concentration above the MCL specified for that pollutant.

[82] A Phase I Investigation generally includes historic land use research (historic aerial photographs and parcel maps, land use permits and title history), a physical site inspection and consideration of vicinity land uses that use hazardous materials and which could result in contamination of the subject property.

identified some areas of soil discoloration which were of suspicious origin (i.e., the discoloration may be caused by hazardous material contamination). Based upon the results of the Phase I Investigation, a Phase II Subsurface Investigation was completed for the PFT property.[83] Determinations within a Phase II Investigation are based upon the collection of samples (soil and groundwater) from the site and the completion of laboratory analyses upon the collected samples. Results of the Phase II Investigation are summarized below.

A total of eleven test pits were excavated on the PFT property to examine representative subsurface soil conditions, with depths varying from 3 to 7 feet. In addition, four monitor wells were drilled to obtain representative groundwater samples beneath the property; soil samples were collected during the drilling process for each of the wells. Soil samples obtained from nine (9) of the fifteen (15) sample locations contained concentrations of Total Recoverable Petroleum Hydrocarbons (TRPH) above the 100 mg/kg cleanup level established by Santa Barbara County EHS. These concentrations ranged from 310 to 5600 mg/kg. The absence of various indicator substances points to this contamination as unrefined petroleum material (e.g., crude oil or natural tar deposits). However, the exact composition of the petroleum contaminant has not been determined at this time. One of the soil samples also contained trace concentrations of five organic compounds common to industry: toluene, methylene chloride, 2-butanone, acetone and carbon disulfide. The first four of these compounds are solvents, while the last is a popular fumigant. Lastly, soil samples collected from one location contained lead concentrations above the established hazardous level. Other metals were detected in six soil samples, but the concentration of the metals was below the level established as hazardous for each of the encountered metals.

Groundwater samples were collected and analyzed from each of the four groundwater monitor wells. None of the groundwater samples contained detectable levels of petroleum contamination, lead or heavy metals, or volatile organic compounds (such as those identified in one soil sample). However, samples from one of the monitor wells indicated that the general physical and inorganic properties of the water would not meet drinking water standards. The water samples from this well were high in total dissolved solids, fluoride, chloride, sulfate and iron, indicating both that the shallow water would not represent a potable water source and that seawater intrusion is likely occurring under at least a portion of the property.

1.2.2 Santa Barbara City and SPTC Property

Table 1 of the Project Description gives specific information related to parcels owned by the City of Santa Barbara and SPTC which are included in the proposed project. In general, the City property is comprised of portions of four parcels which include Carpinteria Street, frontage along the north side of Cabrillo Boulevard and the area roughly from Santa Barbara Street east to Laguna Channel (south of the SPRR right-of-way and north of the City Cabrillo Boulevard frontage parcel). The SPTC properties included in the proposed project are generally described as the right-of-way along the south side of the railroad tracks from Santa Barbara Street east to Laguna Channel and a small triangle property bounded by the railroad tracks on the south, Santa Barbara Street on northeast and Mason Street on the northwest. The City property is occupied by the City Waterfront Department Headquarters, a small concrete block structure. Areas of the City property are also used for outdoor storage. Items stored on the City property are similar to those stored on the PFT property (see description above). The SPTC properties contain vaults and control boxes associated with rail operations, as well as some small debris piles with soil materials and tree-trimming wastes. Present and historic activities on the City and SPTC property have involved substances which are designated as hazardous and, therefore, contamination may be present on the site.

[83] A Phase II Investigation is designed to identify the nature of contamination present, including both composition and concentration.

Dames & Moore prepared a Phase I Investigation, or Preliminary Site Assessment, of the City and SPTC properties in April 1992 to address the potential for contamination to be present on the site. The Phase I Investigation identified past land use activities with the potential for site contamination, as well as some areas of soil discoloration which were of suspicious origin. Based upon the results of the Phase I Investigation, a Phase II Subsurface Investigation was completed for the City and SPTC properties. Results of the Phase II Investigation are summarized below.

A total of ten test pits were excavated on the combined City and SPTC properties to examine representative subsurface soil conditions, with depths varying from 3 to 7 feet. Two hand auger borings were also made to depths of 1 and 2 1/2 feet in the sediments along Laguna Channel to collect soil samples. In addition, three monitor wells were drilled to obtain representative groundwater samples beneath the property; soil samples were collected during the drilling process for each of the wells. Nine (9) of the sixteen (16) soil samples analyzed contained concentrations of TRPH above the 100 mg/kg cleanup level established by Santa Barbara County EHS. These concentrations ranged from 170 to 2,129 mg/kg. The absence of various indicator substances points to this contamination as unrefined petroleum material (e.g., crude oil or natural tar deposits). However, the exact composition of the petroleum contaminant has not been determined at this time. One of the soil samples also contained trace concentrations of an industrial solvent: tetrachloroethane. Metals were detected in each soil sample analyzed for metal content, but the concentration of the metals was below the level established as hazardous for each of the encountered metals.

Groundwater samples were collected and analyzed from each of the three groundwater monitor wells. None of the groundwater samples contained detectable levels of petroleum contamination, lead or heavy metals, or volatile organic compounds (such as that identified in one soil sample). However, samples from one of the monitor wells indicated that the general physical and inorganic properties of the water would not meet drinking water standards. The water samples from this well were high in total dissolved solids, fluoride, chloride, sulfate and iron, indicating both that the shallow water would not represent a potable water source and that seawater intrusion is likely occurring under at least a portion of this property as well.

1.2.3 Lagomarsino Family Trust Property

The Lagomarsino Family Trust (LFT) property is comprised of four parcels (APN 33-042-01, -02, -03 and -04) totaling approximately 0.55 acres; two parcels are actually owned by Hazel Laffler. The LFT property is generally bounded by Chapala Street on the west, Montecito Street on the north, Gold Coast Cycles on the east and Open Air Bicycles and the Santa Barbara Railway Depot on the south. The LFT property is currently vacant, but was the former site of a Shell Oil service station. The service station was closed due to a known problem with leakage from the on-site underground storage tanks (gasoline, diesel fuel and waste oil products). More stringent monitoring requirements imposed in 1987 identified the tank leaks and the presence of soil contamination.

A Phase I Investigation was not necessary for the property, since contamination was detected during required routine monitoring in connection with operation of the former service station. The tanks were removed immediately following detection of the leaks and contaminated soils around the tanks were excavated and transported to a licensed hazardous waste disposal facility. Soil sampling and analyses were conducted during soil excavation to ensure that all soils contaminated by the leaking tanks were removed. At that time, a Phase II Investigation was undertaken including soil sampling and a series of groundwater monitor wells to assess the extent of possible groundwater and soil contamination for the remainder of the site. Soils in the area of former pump islands were later found to have unacceptable contaminant levels and these soils were also excavated and transported to a licensed hazardous waste disposal facility. Santa

Barbara County EHS staff have indicated that on-site soil contamination has been remediated to below "action levels" (any residual compounds found in on-site soils are below the threshold concentration identified as hazardous and, therefore, no further action need be taken).

Initial groundwater sampling at the LFT property indicated the presence of total petroleum hydrocarbons and various gasoline constituents above the action level, indicating the need for some type of groundwater remediation (i.e., cleanup) effort. Additional wells were installed in order to assess the spatial extent of the contamination and to determine the direction of groundwater flow. This information is necessary in order to design a groundwater treatment program. However, at that time (early 1989) the RWQCB indicated that cross-town freeway construction would involve extensive dewatering in the vicinity of State Street and U.S. Highway 101, in order to construct the new underpass. The dewatering involved a number of extraction wells to locally depress the groundwater table such that excavation for the underpass would not become flooded. RWQCB decided to postpone an individual treatment plan for the LFT property and instead to require the monitoring of water quality on a quarterly basis at the LFT property to determine if it improved. The dewatering effort temporarily changed the direction of groundwater flow, with the result that contaminated groundwater was drawn away from the LFT property and extracted by Caltrans in their dewatering system. All extracted water from the dewatering system was subjected to treatment to remove the contamination, under permit from the RWQCB. The extracted contaminants were disposed of in accordance with applicable regulations. Recent groundwater monitoring results from the LFT property indicate that residual contaminant levels in sampled water are below action levels. The RWQCB has officially "closed" the site (which is the regulatory term to indicate satisfactory conclusion of remediation or acceptable on-site soil and water quality).

1.2.4 Salsipuedes Street Extension Corridor

Salsipuedes Street currently terminates on the north and south sides of the Southern Pacific Railroad (SPRR) tracks; northern and southern street sections are separated by a distance of approximately 450 feet. In order to improve traffic circulation in the project vicinity, Salsipuedes Street would be extended across the SPRR tracks (as an at-grade crossing) to connect the existing segments of this street. The corridor for the extension would traverse a portion of two assessor parcels (APN 17-010-46 and -48) as well as portions of the existing Salsipuedes Street right-of-way and would have a width of approximately 84 feet. In this quadrant of the City, the area located north of the SPRR tracks may be characterized as industrial or quasi-industrial in nature. Concern therefore exists that contamination could exist within the street extension corridor. For this reason, the City commissioned a Phase I Hazardous Materials Investigation to address the Salsipuedes Street extension corridor.

The Phase I Investigation identified past and present land use activities in the vicinity of the street extension corridor with the potential to produce environmental contamination. Much of the corridor to the north of the railroad tracks is covered by asphalt paving, precluding visual examination of shallow soils. Examination of the ground surface in exposed areas south of the railroad tracks did not reveal any signs of contamination. However, soil samples from one location within the southern Salsipuedes Street right-of-way (collected for the City Phase II described above) contained moderate levels of petroleum contamination. Within the railroad right-of-way, there were no areas of obvious soil discoloration and the gravel along the rails was not visibly more grimy within this section, compared to adjacent sections. Nonetheless, SPRR has an underground sump for waste oil which is located immediately adjacent to the extension corridor; the potential exists for leaks from the tank which would not be apparent at the ground surface. Consequently, the Phase I Investigation concluded that the potential exists for contamination to be present within the Salsipuedes Street extension corridor.

2.0 Project Impacts

There are two hazardous materials/wastes effects which could be associated with the proposed project: 1) public health risks posed by commercial and recreational development of properties with existing contamination; and 2) operation and maintenance activities from the hotel, youth hostel and park components of the project. The type of materials involved and all associated potential impacts are discussed below.

2.1 Impacts From Existing Site Contamination

2.1.1 Parker Family Trust Property

The PFT property is proposed to accommodate the Hotel, Great Meadow, Wilds and Lagoon/Wetlands components of the proposed project. Members of the public would be expected to stay at the hotel, as well as utilize the other project components as noted above for recreation. Contaminants have been identified in on-site soils, at concentrations above established clean-up levels. The most widespread contamination is comprised of unspecified petroleum compounds, likely to be in an unrefined state. Crude oil and natural tar both contain compounds which are known to cause cancer in humans. Lead has also been identified in soils of one area of the site, again at concentrations defined as hazardous. Lead is toxic and can lead to serious health effects if ingested. Consequently, if existing contamination on the PFT property is not cleaned up (or remediated) the public could potentially be exposed to hazardous levels of various pollutants and significant health-related impacts could occur. Groundwater beneath the site has been sampled and analyzed and has been found to be free of the contaminants identified in the on-site soils. Therefore, soil contamination does not appear to be widespread laterally or vertically and an available method of remediating soil contamination should be feasible to address this problem. **Impacts resulting from existing PFT site contamination would be considered potentially significant and adverse.**

Groundwater beneath the PFT property is not contaminated with any hazardous substances; however, the physical properties of the water fall outside of the acceptable range for drinking (potable) water. High chloride and fluoride content in the water suggests the presence of seawater intrusion into the shallow groundwater table beneath at least a portion of the site. This water would have to be treated prior to use as irrigation or potable water supply, and it is recommended that neither use be pursued, in that seawater intrusion could be exacerbated with additional local withdrawals (groundwater extractions from the site are not currently proposed with the project). The dewatering program for the construction of the sub-terranean hotel portion of the site parking would be temporary, and extracted water would not be used for any domestic purposes.[84] It is assumed that water extracted during the dewatering program would be released to Laguna Creek. If Laguna Creek is proposed to accept the extracted water from the dewatering program, the operation would be governed by appropriate permits from the California Department of Fish and Game, U.S. Army Corp. of Engineers and Santa Barbara County Environmental Health Services Department.

2.1.2 Santa Barbara City and SPTC Property

The Santa Barbara City property is proposed to accommodate linear park elements along the north edge of Cabrillo Boulevard and the Carousel and Fountain Plaza components of the proposed project. The SPTC property would provide parking and vehicular site access. Petroleum contaminants similar to those discussed for the PFT property were identified on this property. If existing contamination on this property is not cleaned up (or remediated) the public could potentially be exposed to hazardous levels of various

[84] The hotel parking structure would incorporate a "French Drain" to collect Groundwater and Direct it away from the foundation. This practice is not considered "extraction."

pollutants and significant health-related impacts could occur. Again, groundwater samples are devoid of contaminants identified in on-site soils, indicating laterally and vertically limited contamination, and an available method of remediating soil contamination should be feasible to address this problem. **Therefore, impacts resulting from existing site contamination would be considered potentially significant and adverse.**

Groundwater sampling results for natural constituents under this portion of the site are nearly identical to the PFT Property. The reader is referred to the discussion above.

2.1.3 Lagomarsino Family Trust Property

The LFT property is proposed to accommodate the youth hostel component of the project. Petroleum contaminants were originally identified in on-site soils, as a result of historic service station operations on this site. However, contaminated soils were excavated and removed from the site and were replaced with clean fill materials. Therefore, soils on the site are considered "clean" and would not pose a threat to the proposed development.

Groundwater beneath the LFT property was at one time contaminated with gasoline and other petroleum constituents from historic site activities. The RWQCB has required quarterly monitoring since the contamination was detected and the monitoring program results indicate contamination has been below action levels since mid-1991. Santa Barbara County EHS staff have requested that the RWQCB provide site closure and this request is expected to be honored in the near future. (The site is currently in escrow for transfer to the Parker Family Trust; one condition of the escrow agreement is that the site receive closure from RWQCB prior to the transfer of ownership.) Significant groundwater contamination is therefore not present below the site and would not pose a threat to the proposed development. Natural physical properties of the shallow groundwater beneath the site were not analyzed as part of the monitoring program, but it is assumed that the water would probably fall outside of the acceptable range for drinking (potable) water due to high levels of chloride and total dissolved solids. This water would have to be treated prior to use as potable water supply, but could potentially be used as an irrigation water supply without treatment. However, it is recommended that neither use be pursued, in that potable water can be more reliably provided by the City and reclaimed water should be considered for landscape irrigation to reduce freshwater consumption demands.

2.1.4 Salsipuedes Street Extension Corridor

Construction of the Salsipuedes Street extension would involve a corridor of approximately 450 feet in length and 84 feet in width. The areas which would be subject to construction are currently occupied by vacant open space at the south end, railroad tracks at the center and Lash Construction Company construction yard and portions of Salsipuedes Street at the north end. Given these uses, any contamination which could presently exist in underlying shallow soils does not present a substantial risk to public safety. However, with construction of the Salsipuedes Street extension, two effects could occur. First, excavation of the road grade could expose workers to unhealthy levels of contamination (short-term). Second, creation of paved surfaces throughout the corridor could hamper later efforts to remediate contamination, if such is not corrected at the time of road construction. **Both of these impacts would be considered potentially significant and adverse.** Based upon the limited areal extent of the construction activities, if contamination is present, an available method of remediation should be feasible to address this problem.

2.2 Impacts From Project Operation and Maintenance

Typically, maintenance activities for a park include the use of fertilizers and occasional pesticides in turf and other landscaped areas. These substances may contain hazardous elements or may themselves represent a hazardous material. Due to the nature of landscaped areas (i.e., passive recreation not subject to heavy physical abuse) application rates for landscape maintenance substances would be low and would not represent a potential problem. However, the storage of large quantities of fertilizer or pesticide on the project site could create the potential for accidental release to the environment and significant site contamination. The proposed storage of these materials is not addressed in current design plans and the City may choose to consolidate these additional materials at an existing park department storage facility. **However, in that the potential exists for the improper storage of fertilizer and/or pesticide on the project site, significant adverse impacts could occur unless adequate precautions are taken.**

The hotel and hostel would be anticipated to store and use a moderate amount of commercial grade cleaning compounds. Many of these cleaning compounds are water soluble and are disposed of in the sewer at the completion of cleaning activities. There would be little concern relative to the use and storage of these water soluble cleaning compounds. However, there are other substances which are often kept "on-hand" for dealing with more difficult cleaning problems (such as stained carpet or upholstery) which are solvent-based and which must be carefully stored and properly disposed of in order to prevent possible contamination. It is not anticipated that the volume of these latter substances would be very great, but if the hazardous materials stored at the hotel or hostel exceed threshold quantities, a Business Plan would be required. Materials used for operation and maintenance of the hotel and hostel are not anticipated to pose a significant hazardous material problem given existing regulations governing such, as described below.

The County Environmental Health Services Department is responsible for administering the state Hazardous Materials Management Act and would review and approve any required Hazardous Materials Management Plan and Hazardous Materials Inventory Statement. If stored quantities would exceed threshold amounts, the Environmental Health Services Department would require and review a Business Plan for the proposed project.

3.0 Mitigation Measures

In order to mitigate potentially significant impacts associated with hazardous materials and wastes as described above, the following mitigation measures are required to be incorporated into the project design:

For the PFT Property:

- Prior to issuance of a land use permit, the landowner shall submit the Phase II Investigation to the Santa Barbara County Environmental Health Services Department and shall work with EHS staff to prepare and implement an appropriate remediation plan for the property to reduce contaminant concentrations to acceptable levels. Remediation efforts shall be completed and soil contamination brought to acceptable levels prior to the issuance of any building permits for the proposed project.

For the City and SPTC Property:

- Prior to issuance of a land use permit, the City shall submit the Phase II Investigation to the Santa Barbara County Environmental Health Services Department and shall work with EHS staff to prepare and implement an appropriate remediation plan for the property to reduce contaminant concentrations to acceptable levels. Remediation efforts shall be completed and soil contamination

brought to acceptable levels prior to the issuance of any building permits for the proposed project.

For the Salsipuedes Street Extension Corridor:

- Prior to commencement of construction, the City shall have a Phase II Investigation prepared for the land within the Salsipuedes Street Extension Corridor. The completed Phase II Investigation shall be submitted to the Santa Barbara County Environmental Health Services Department and the City shall work with EHS staff to prepare and implement an appropriate remediation plan for the property to reduce any identified contaminant concentrations to acceptable levels. Remediation efforts shall be completed and soil contamination brought to acceptable levels prior to the commencement of road construction activities. (Excavation and earthwork activities for the roadway may be initiated in concert with remediation efforts and may be required as part of the remediation process; however, new road materials should not be placed prior to the completion of the remediation program, unless approved by Environmental Health.)

Project Design:

- If landscape maintenance supplies are proposed to be kept on the project site, prior to issuance of a land use permit, the City shall submit plans to the City Fire Department and the Environmental Health Services Department with the following requirements:

  1. A fire protection sprinkler system or other approved fire protection system shall be installed in the chemical storage areas.

  2. The storage area for pesticides, herbicides, fungicides and/or fertilizers shall be designed with a low berm around the interior floor to prevent migration of materials in the event of a spill. The floor shall be a concrete slab. The berm shall be designed to provide 100 percent containment of any stored liquids and 20 minutes of fire protection sprinkler water flow.

- The applicant shall develop a Hazardous Materials Management Plan, Hazardous Materials Inventory Statement, and a Hazardous Materials Business Plan, as applicable, with respect to actual stored quantities of hazardous and regulatory threshold quantities, to be reviewed and approved by the County Environmental Health Services Department.

4.0 Residual Impact Statement

The above mitigation measures are designed to remedy existing contamination on various properties which comprise the project site, such that public exposure to hazardous wastes would be avoided with respect to the proposed project. Further, the measures would ensure that any hazardous materials used or stored in connection with the proposed project would not lead to the potential for future environmental contamination or creation of a public health risk. With the incorporation of the above mitigations, hazardous materials and wastes impacts would be reduced to acceptable levels.

J. RECREATION

The Waterfront Park project site is one of the last significant open spaces along the north side of Cabrillo Boulevard. As such, development on this site could impact the recreational/open space value of the site. The following section focuses on the potential recreational impacts, both beneficial and potentially adverse, that could occur with the construction of the Waterfront Park, Hotel and Hostel Project.

1.0 Environmental Setting

The City of Santa Barbara affords a variety of recreational opportunities. The geographical location of the City and its favorable Mediterranean climate enables residents and tourists to take advantage of an outdoor lifestyle. As indicated in the City's General Plan, park and recreational facilities are an important facet of the community which enhances the urban environment.

The park and hotel components of the proposed project would be located in the Waterfront Area of the City of Santa Barbara. The hostel component would be located on the corner of West Montecito and Chapala Streets, adjacent and to the east of the Moreton Bay Fig Tree. The recreation analysis will focus on the park and hotel site in terms of potential recreational impacts. However, potential hostel users will be factored into the impact analysis.

While the Waterfront Park site is one of the last large natural open spaces left in the Waterfront Area, it is unusable for recreational purposes and is run-down in its current state. Portions of the site are used as storage for the City and the Parker Family Trust. However, the majority of the site is currently covered with trash and debris and is used as a congregation place for the homeless.

Land uses in the Waterfront Area are largely visitor-serving commercial and open space uses. Use of the Waterfront Area for recreational purposes dates back to 1872, when Easterners began traveling to the Santa Barbara Waterfront to partake in the sulfur-charged water from springs on Burton Mound east of the site. With the development of the Potter Hotel in 1902, the area began to play an increasing role as a recreational destination. During this same era, private citizens began to acquire East Beach property for park land, with several individuals deeding park land to the City.

In the early 1970's, the City adopted a Redevelopment Plan for the Downtown and Waterfront Areas of the community. The Redevelopment Plan and its amendments envisioned portions of the park and hotel site as a recreational/open space resource for use by the community and its visitors.

According to the Parks and Recreation Facilities and Programming Master Plan[85], in planning for Santa Barbara's parks and recreation services, the concept of community level service areas was developed to provide for the types and range of development and programming appropriate to community-wide and even City-wide needs. Unlike neighborhood parks to which residents walk a few blocks, community level service facilities must be served by public transportation, as the service radius is greatly expanded. In addition to passive parks and open space, active facilities normally include swimming pools, athletic fields, open game areas (turfed and hard surface), gymnasium complex, tennis courts, recreation centers, picnic facilities, free play areas and off-street parking, all with appropriate plantings and landscaping.

[85] Based on research conducted at the Santa Barbara Public Library Census Data Department, May 19, 1993.

Four community service areas have been identified in the City: Hope, Las Positas Valley, Laguna and Waterfront. An inventory of major existing recreational resources within these service areas was completed by the Parks and Recreation Master Plan and an assessment made of additional acreage required to provide a full compliment of facilities and programs for the community.

The City of Santa Barbara presently has 63 park sites that are considered formal public parks and community recreation areas. The project site is located in an area possessing a large quantity of City parks and recreation sites, as well as quasi-public areas (i.e., Stearns Wharf area and the Santa Barbara Zoological Gardens). Specifically, there are eleven parks within one mile of the project site. These public parks represent approximately 172 acres of usable park land for City residents and tourists (see Figure VIJ-1 the Waterfront Area Parks map). Table VIJ-1 below identifies the acreage associated with the parks.

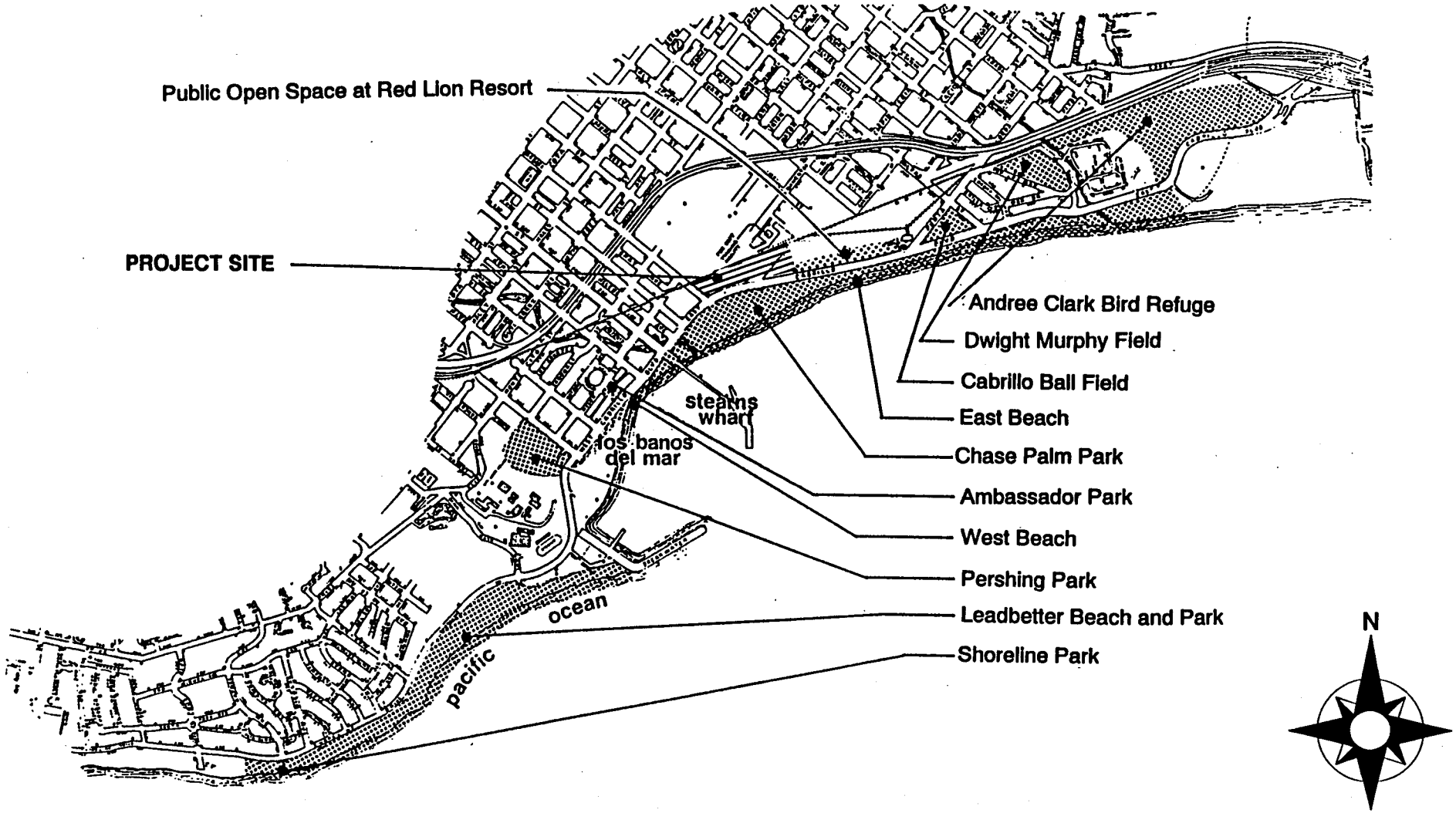
TABLE VIJ-1
WATERFRONT AREA PARK LAND

Park	Acreage
Andre Clark Bird Refuge	42.4 acres
Dwight Murphy Field	10.5 acres
Cabrillo Ball Field	5.0 acres
East Beach	44.0 acres
Chase Palm Park and Recreation Area	10.0 acres
Ambassador Park	0.5 acres
West Beach and Los Banos Pool area	11.5 acres
Pershing Park and Plaza Del Mar	5.0 acres
Leadbetter Beach and Park	27.3 acres
Shoreline Park	14.6 acres
Public Open Space at the Red Lion Resort	0.7 acres
TOTAL	**171.5 acres**

1.1 Proposed Park Components

The proposed park portion of the site is planned as an active recreational facility that would serve both residents and tourists. The park portion of the site would provide the City of Santa Barbara with approximately 10 acres of contiguous park land. As depicted in Figure III-4, the Park and Hotel Site Plan, the proposed park portion of the site would incorporate eight distinct physical elements to create active and passive recreational opportunities (see Project Description).

Table 3 in the Project Description Section provides the size of each of the above components. Public restrooms for the proposed park would be located directly north of the Plaza area at the western end of the park portion of the site and directly adjacent to the Tot Lot, which is located in the middle to eastern portion of the park portion of the site. George W. Girven Associates, Inc., has designed the park component of the project. The proposed park portion of the site would contain all of the Required



NO SCALE

FIGURE VIJ-1
WATERFRONT AREA PARKS

INTERFACE

Elements of Park Design, as requested by the City Parks & Recreation Department, including Natural Area, Water Element, Active Recreation Areas, Circulation, Screening, Art, and Arts and Crafts. The required elements of the Park Design were derived from public input generated at the July 20, 1990 planning charette from meetings with community groups, and from discussion with City Parks and Recreation Staff. Once Mr. Girven's design team was selected, the team met with City Parks and Recreation Commissioners and Staff, arts groups, and close to 40 different community groups to obtain input prior to finalizing the submitted conceptual plan.

Recreation activity areas have been developed within the park proposal for tots (to age 5), children (4-9), youths and seniors. For tots, the Tot Lot, adjacent to the Great Meadow, would include safe and usable play equipment. The Tot Lot would be surrounded by lawn with benches for parental supervision nearby. The Tot Lot would be across from the Great Meadow family/group picnic area, allowing for family interaction. Tots and children would also enjoy the Carousel which would be located near the Plaza, providing families with children two separate focal areas within the park portion of the site.

Although specific details of the proposed Pump House's uses have not been defined at this time, the Pump House is proposed to be a Recreation Center, which may offer teens after-school and weekend activities However, in the future, the Recreation Center (Pump House) may be specifically utilized as a Teen Center for local youth. The proposed Recreation Center would provide a public meeting room for various activities and may include video games, a pool table, Ping-Pong tables, food concessions and game rentals. Outdoor recreational equipment may also be available for rental. The Pavilion would also be available to stage music concerts, evening dances or other activities.

Seniors would be offered a range of activities at the park also. The park portion of the site would be designed with easily accessible walking paths and ample benches for sitting. The Pump House area would include outdoor chess tables with concessions for croquet, boccie ball, etc. Afternoon concerts in the park could be scheduled at the Pavilion. While specific details are not known about the contents of the garden that is proposed, it may include strolling gardens, a fragrance/texture garden for the sight impaired and a rose exhibition garden. Furthermore, an artist is part of the Design Team and he will be responsible for working with local artists to incorporate art into the project in a variety of ways. According to the 1989 Park and Recreation Facility Needs Assessment, no additional lawn bowling is needed in Santa Barbara and none is proposed at the park portion of the site.

2.0 Project Impacts

The City of Santa Barbara does not have any thresholds relative to requirements for provision of recreational facilities. According to a Parks and Recreation Department representative[86], the residential densities in the City of Santa Barbara vary so greatly with each neighborhood that it is too difficult to assign a required amount of park land per acre within this City. The County of Santa Barbara Comprehensive Plan does have a standard which states that there shall be 4.7 acres of park land per 1,000 persons. Although this threshold is not a requirement of the City and therefore is not applicable, the City does surpass this threshold by providing approximately twelve times more than 4.7 acres of community park land per 1,000 residents in the Waterfront Area. There are approximately 1,500[87] residents in the

[86] Personal communication with Bill Goodnick, City of Santa Barbara Parks and Recreation Department.

[87] Based on research conducted at the Santa Barbara Public Library Census Data Department, May 19, 1993.

immediate Waterfront Area (not including the east mesa and west side neighborhoods), which extends from El Escorial west to Castillo Boulevard and inland to the Southern Pacific Railroad tracks. Given that there are approximately 172 acres of park land in this vicinity, there are approximately 8.7 residents per acre of park land. The amount of park land which is currently provided in the Waterfront Area is greater than any other portion of the City. However, it should be noted that many residents from outside the Waterfront Area travel to utilize these community parks. The hotel/motel uses along the Waterfront utilize the parks as well as the entire Santa Barbara community. Therefore, while it may appear to be an abundant amount of park land for the Waterfront neighborhood, from a regional and community wide standpoint, the amount of park land available in the Waterfront Area would not be considered excessive.

The City Parks and Recreation Department maintains a Needs Assessment which outlines the future parks and recreation improvement goals of the City. The Needs Assessment breaks out the park needs of the community on a neighborhood by neighborhood basis. The Needs Assessment does not indicate that the Waterfront neighborhood requires any additional facilities. According to the City's Master Environmental Assessment, the Waterfront Area currently has more than sufficient park and recreation facilities to support the Waterfront residents. However, as noted above, given that the Waterfront park lands serve the neighborhood, the entire community and tourists, the amount of park land available is not excessive or overly abundant.

Almost the entire Waterfront Area is bounded to the south by beaches, and one-quarter of the Waterfront land area is comprised of parks and recreational facilities. While the Waterfront neighborhood is well supported with parks and recreational facilities, other portions of the community, such as the Eastside and Westside areas, are reported to have insufficient parks and park land and recreational facilities. Therefore, the community parks located in the Waterfront Area are developed to serve the entire community. Additionally, concurrent with the implementation of this project, Salsipuedes Street is proposed to be extended through to the Milpas area and the Eastside neighborhood (see the Traffic and Circulation section of this EIR), which would make the Waterfront Area more accessible to the Eastside residents.

It is anticipated that the Waterfront Area could absorb the additional demand percentage (15% or 45 persons) of park users generated by the proposed project (hotel and hostel components). Furthermore, the proposed project would add ten acres of park land to the Waterfront Area, which would more than offset the increase in park users generated by this project. The combination of the provision of an additional ten acre community park at this location and the extension of Salsipuedes Street would also serve to improve access to parks and recreational facilities for Eastside residents. Therefore, the proposed project would not result in any significant adverse impacts to recreational facilities in the area. In fact, the addition of the ten acres of park land at this location, bordering the Eastside neighborhood which is in need of additional park land, would be considered a beneficial impact of the proposed project.

3.0 Mitigation Measures

As indicated above, the proposed Waterfront Park, Hotel and Hostel Project would not result in any significant adverse impacts on the recreational facilities of the City. Improvement of ten acres of the site with a park/open space use would be considered a beneficial impact, given the existing dilapidated, non-usable condition of the site.

4.0 Residual Impact Statement

Because there would be no adverse impacts, no mitigation measures would be required.

VII. IMPACTS NOT FOUND SIGNIFICANT

A. WATER RESOURCES

Historically, the City's potable water supply has come from Cachuma Reservoir and Tecolote Tunnel, Gibraltar Reservoir and Mission Tunnel, and groundwater.[88] The City has recently added several new water sources including a commitment to join the State Water Project via construction of the Coastal Aqueduct and an expanded wastewater reclamation program which frees up potable water by using reclaimed water for irrigation purposes. In addition, the short-term emergency desalination plant is currently undergoing review to be converted into a long-term facility. The City's current dependable supply of potable water is 16,500 acre-feet per year (AFY).[89]

According to the City's Initial Study (contained in Appendix A), the projected water use for the park and hotel site is 40.03 AFY. Of this amount, 25.72 AFY would be potable water and 14.31 AFY would be non-potable (reclaimed) water. The hostel would use 2.76 AFY of potable water which is 2.41 AFY less than the site's historical usage of 5.17 AFY. The total net water use for the project would therefore be 37.62 AFY. The Specific Plan, which governs the park and hotel site, has a maximum potable water use of 2.4 AFY/Acre. This requirement equates to a maximum allowed potable water use for the hotel and park site of 30.28 AFY. The proposed potable water use is 25.72 AFY, which includes a 35% contingency factor based on the applicant's contention that a luxury hotel would use more water than a standard hotel of similar size. Given that the proposed potable water use is well below the threshold set by the Specific Plan, no inconsistencies with this condition are anticipated.

After the City Council declared that the drought emergency was over due to the attainment of ample water supplies, the City's threshold for significant impacts to water resources was revised to reflect this change. The interim threshold of significance for total City water demand is 14,840 AFY (90% of the City's dependable supply). The projected water demand for fiscal year 1992/93 is 11,210 AFY according to the Quarterly report to the City Council on water usage in July 1992. According to the City Water Manager's Report dated January 5, 1993, actual water use for the fiscal year to date is 7,078 AFY which, when annualized, is slightly lower (11,154 AFY) than the July annual projection. The additional water demand created by this project would result in a projected total City water demand of 11,192 AFY (11,154 AFY + 38 AFY) which is well below the threshold of significance. Therefore, no significant impacts to water supply are expected to occur.

88 Long-Term Water Supply Alternatives Analysis and Urban Water Management Plan by the City of Santa Barbara, April 1991.

89 One AFY of water is equivalent to 325,851 gallons.

B. DRAINAGE

1.0 Park and Hotel Site

The following project information was provided in a preliminary hydrologic and hydraulic report conducted by Penfield and Smith Engineers in June 1992. This hydrologic and hydraulic report assessed the water movement and drainage characteristics of the proposed park and hotel site. As a result of the site's drainage characteristics, the report determined that the proposed park and hotel site would require the construction of four drainage pipe systems, which would capture runoff and transport it to existing storm drains, retention basins or Laguna Channel. The four drainage systems proposed for the park and hotel site are illustrated as Line A, Line B, Line C, and Line D in the Grading Plan contained in Appendix B.

Specifically, Line A consists of a 24-inch reinforced concrete pipe (RCP), which would be the mainline pipe, as well as two 10-inch PVC storm drains. Line A would be located on the southeasterly portion of the site. Line A would commence at an existing inlet located at the west-side of Salsipuedes Street and would extend west to the proposed Meadow portion of the park portion of the site. The Meadow area is a depressed area which would function as a local retention basin. Line B would consist of a 15-inch RCP that would be located at the northeast corner of the site. Line B would drain to the east and connect into an existing drainage inlet along Salsipuedes Street. Line C would consist of an 18- and 15-inch RCP with a 12-inch storm drain that would be located in the center portion of the 13-acre site. Line C would originate at the proposed park's playground area and would flow west to the easterly bank of Laguna Channel, where it would discharge into the creek. Line D would consist of a 12-inch PVC storm pipe which would be located on the westerly portion of the site. Line D would extend from the proposed park portion of the site's Plaza, east to Laguna Channel, where it would terminate on the westerly bank of the creek.

In addition to the drainage runoff received by the project's proposed four drainage systems, runoff which drains into the proposed Lagoon would be pumped into Laguna Channel. Water in The Wilds' creeklets would be periodically drained through a pipeline which would begin at the creeklets and would continue north until reaching the El Estero Wastewater Treatment Plant where it would terminate. Water from the creeklets would be treated at the plant and discharged through the ocean outfall. Runoff from the portion of the project fronting Cabrillo Boulevard would be received by existing drainage inlets and would drain into the proposed park portion of the site's Lagoon and wetland area.

The preliminary hydrologic and hydraulic report assessed water movement and drainage patterns of the park and hotel site, the proposed four drainage systems and the site's existing drainage characteristics. The report concluded that the proposed drainage treatment would be adequate to accommodate the proposed project's storm runoff. Therefore, drainage impacts associated with the proposed park and hotel site would be insignificant.

2.0 Hostel Site

As a result of the previous development that was located on the proposed hostel site, adequate drainage facilities currently exist within the immediate vicinity of the site. In addition, impermeable surfaces associated with the proposed hostel would be limited to approximately 35 percent (8,500 square feet) of the 0.55 acre hostel site. Because runoff from the site is currently captured by existing drainage facilities, and given the relatively small amount of paving surfaces proposed, adverse drainage and runoff impacts are not

anticipated. Therefore, drainage impacts associated with the development of the proposed hostel at 33 West Montecito Street would be insignificant.

C. SCHOOLS

The Initial Study prepared for this project concluded that the proposed Waterfront Park, Hotel and Youth Hostel Project would not result in significant impacts on schools. The questions asked about potential school impacts in the Initial Study included:

Will the proposal result in:

- Substantial increase in the number of school children in the attendance area?
- Aggravation of an existing facilities overcrowding problem?
- A negative impact on student access routes to or from school property during normal working hours?

City Planning Staff responded "Not Significant" to all of these questions based on the official information available to Staff at that time.

While the reasons for this conclusion were not discussed in the Initial Study, the bases for the conclusion were as follows:

By the Santa Barbara School Districts' own calculations, this project will only generate 9.5 elementary and secondary school students, of which about 5.7 will be elementary students. Unlike a residential project which falls into a defined school attendance area, students generated by a commercial project or development could live and attend school in any area of the South Coast (defined as the area from Gaviota to the Rincon). It is quite possible that some or all of the students generated by the project would live outside the boundaries of the Santa Barbara School Districts or attend private schools. It is clear that this project would not result in a "substantial increase in the number of school children in the attendance area" both in terms of total number (less than 10) or in terms of location (scattered).

On the surface alone, the addition of 9.5 students does not appear to result in a significant "aggravation of an existing facilities overcrowding problem." Again, the Districts' own projections indicate that, with the recently approved assignment of sixth grade students to La Cumbre Junior High School, only two elementary schools (Cleveland and Peabody) will exceed their capacity in 1997.

The School District has never formally or officially informed the City that conditions of overcrowding exist in one or more school attendance areas. For example, Government Code Section 65971 provides for a public hearing process for official district findings of overcrowding and a method whereby such findings are transmitted to the City, presumably, in part, to allow the City to identify, discuss and perhaps to assist the school district to mitigate such conditions of overcrowding. Although such a process is only required in connection with the imposition of interim school facility impact fees, it has been in place since 1978 and the Santa Barbara School District has never availed itself of this process.
The proposed project is not near nor does it impact traffic near any school. Therefore, it is not expected to result in any impacts on student access routes.

It must be pointed out that Government Code §65995 limits the amount of fees that can be levied against a

development project, including development projects that involve a legislative action such as the Specific Plan Amendment that is part of this project. The City presently collects the maximum set forth by this section of State law for the Districts. In addition, §65996 of the Government Code limits the methods available to mitigate significant environmental effects generated by development projects. If this project would result in significant impacts on schools, there might be a need to consider the remedies outlined in Government Code §65996 (for example, the district could consider the creation of Mello-Roos Community Facility Assessment District), in addition to the school impact fees already required if the project is constructed. Finally, Corona-Norco Unified School District v. City of Corona [17 Cal.Rptr.2d 236 (Cal.App.4 Dist. 1993)] concluded that, a discussion of potential school impacts in an EIR is precluded because the "City did not have [a] duty, in conducting California Environmental Quality Act (CEQA) review of proposed ... developments, to impose conditions in addition to [the] school facilities fee, [or] to lessen alleged impacts on development projects on local school facilities, in view of [a] statute precluding [a] local agency from denying approval of development project under CEQA ... on [the] basis of inadequate school facilities." Although this case applied to an administrative action, the recent amendment of Section 65996 to include legislative actions makes it clear that the State preemption of this field is all-inclusive.

VIII. ECONOMIC AND FISCAL ANALYSIS

1.0 Introduction

During the scoping process of the EIR, questions were raised regarding the economic and fiscal impact the proposed hotel would have on surrounding Waterfront properties and on the City in general. In particular, the East Beach Planning Committee was concerned about the project's effect on the City's fiscal health and the economic effect on other hotels in the area. Given that Section 15131 of the CEQA Guidelines allows economic information to be included in an EIR, and that the questions raised needed to be answered, Interface contracted with Economic Research Associates (ERA) to prepare an economic and fiscal impact analysis of the proposed hotel. ERA is a real estate and economic consulting firm which has broad experience in all facets if real estate and land use management consulting. The analysis was limited to the hotel component because the fiscal and economic comments received pertained only to the hotel. The following section is taken directly from ERA's December 1992 "Economic and Fiscal Review of the Proposed Waterfront Hotel" (Available at City Community Development Department offices). Consistent with previous actions regarding incorporation of economic information into EIR's, that report has been published as a companion document to this EIR and is incorporated by reference.

2.0 Existing Conditions

Santa Barbara enjoys many natural advantages in terms of tourism attraction. These advantages include wonderful climate, lovely beaches and a beautiful setting. Because of these natural advantages and the area's proximity to the large population in the Los Angeles basin, tourism has become an important contributor to the local economy. Like any industry, success in tourism depends in part on the quality of the products offered. In Santa Barbara, the tourism product includes its hotels, restaurants, shops and other visitor attractions. No aspect of the tourism product is more important than the quality of facilities and services offered by its hotels.

The City of Santa Barbara currently does not have a first-rate luxury hotel. The Four Seasons Biltmore, located in the unincorporated county area of Montecito, is the only true luxury hotel in the South Coast market. Other California communities, which have tourism appeal similar to that of Santa Barbara, such as San Diego, Monterey and the Palm Springs area, are continuing to add more contemporary and higher quality hotels and resorts. As competing areas improve their tourism product, Santa Barbara's market position is expected to decline in relative terms. The small-scale luxury hotel proposed by the Parker Family Trust (Trust) is designed to integrate into the Waterfront Area and clearly represents one such strategic opportunity.

Santa Barbara's share of South Coast hotel revenue has fluctuated between 60 and 63 percent over the past decade. Its share increased with the addition of new inventory and declined steadily during periods of little or no new construction. As shown in Table VIII-1 and Figure VIII-1, Santa Barbara's share of hotel revenue declined steadily from 1983 to 1986. In 1987, its share increased sharply due to the completion of the Red Lion Resort. Santa Barbara's share peaked in 1988 and has declined gradually to a 62 percent share in 1991.

TABLE VIII-1

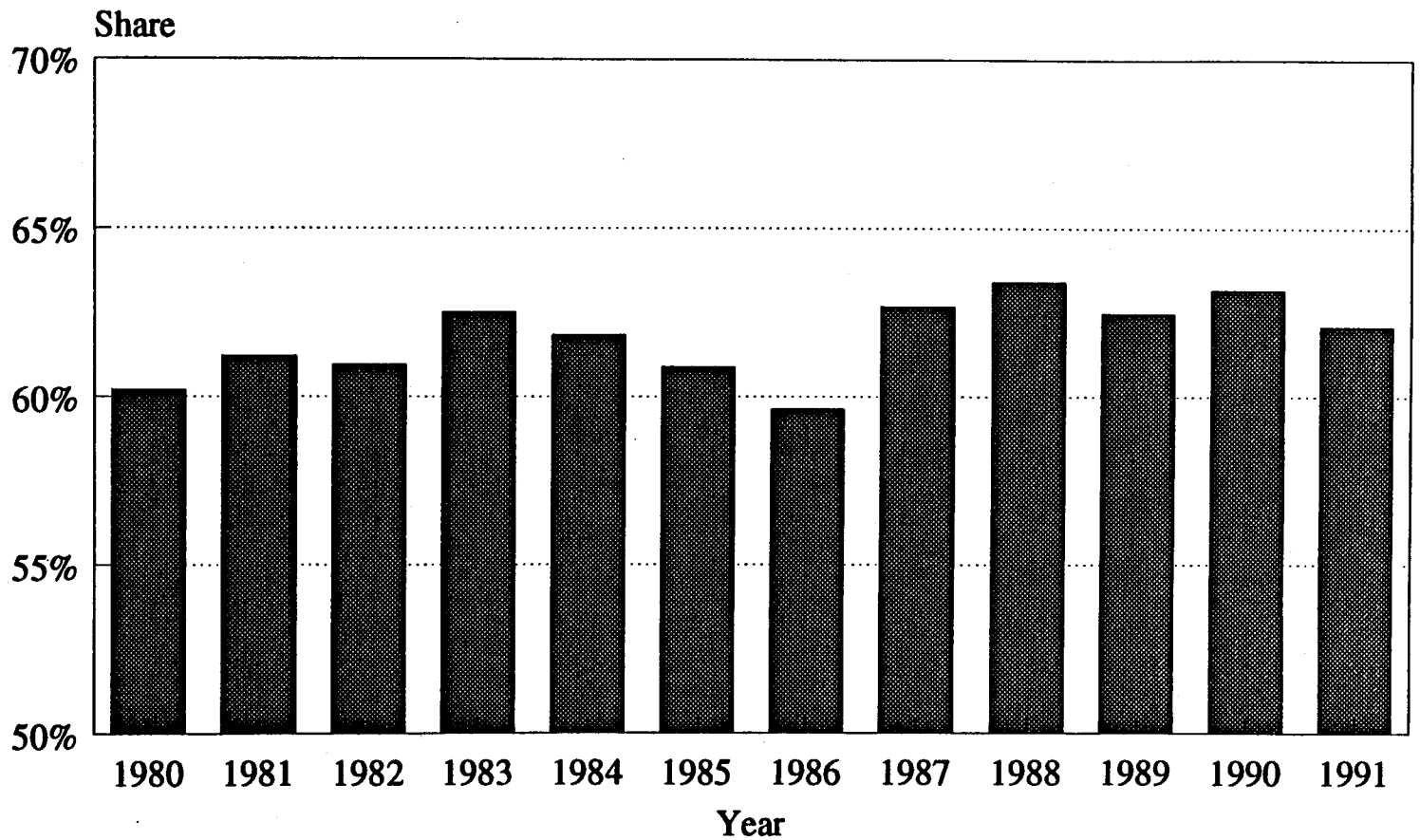
GROSS HOTEL/MOTEL ROOM REVENUE IN THE SOUTH COAST

Year	Gross Hotel/Motel Room Revenue ($000)				South Coast Total Hotel/Motel Revenue		Santa Barbara Share of South Coast Total
	Santa Barbara	Goleta	Montecito	Carpinteria[1]	Amount ($000)	Percent Change	
1980	$17,940	$3,744	$7,552	$556	$29,792	—	60.2%
1981	22,220	4,247	8,942	885	36,294	21.8%	61.2%
1982	24,718	4,612	9,905	1,315	40,550	11.7%	61.0%
1983	28,430	5,311	10,267	1,473	45,481	12.2%	62.5%
1984	33,737	5,987	12,907	1,930	54,561	20.0%	61.8%
1985	35,530	6,328	13,999	2,505	58,361	7.0%	60.9%
1986	37,355	7,370	13,862	4,055	62,642	7.3%	59.6%
1987	46,757	8,653	15,276	3,904	74,589	19.1%	62.7%
1988	48,882	9,189	14,674	4,341	77,086	3.3%	63.4%
1989	52,848	9,849	17,045	4,837	84,580	9.7%	62.5%
1990[2]	54,311	9,842	17,439	4,379	85,970	1.6%	63.2%
1991	52,861	10,607	16,926	4,737	85,131	-1.0%	62.1%
Thru 8/92	35,583	7,602	12,350	NA	55,534	—	—

[1] Carpinteria figures for 1985 through 1991 represent fiscal years.
[2] Carpinteria is estimate.

Sources: Finance departments of listed cities and Santa Barbara County; State Controller; and Economics Research Associates.

Santa Barbara Share of South Coast Hotel Revenues, 1980 - 1991



Sources: City and County Finance Depts.
and Economics Research Associates.

FIGURE VIII-1

Even with completion of a major facility such as the Red Lion Resort, Santa Barbara's average revenue per room is still below the South Coast average and substantially below the neighboring communities of Goleta and Montecito, as shown in Table VIII-2. Santa Barbara has more than its share of the smaller, older and modestly priced facilities. A relatively large share of hotel properties in Santa Barbara have average room rates of under $100 a night. Completion of this proposed luxury hotel project would bring Santa Barbara's average revenue per room closer to the South Coast average.

3.0 Impact on Santa Barbara's Tourism Market Position

The national recession has had a severe impact on the California economy, particularly in Southern California. The tourism industry has suffered as reflected in lower than desirable occupancy rates in Santa Barbara in the recent past. Hotel occupancy rates are often considered a key measure of the demand for an area's tourism product and of the overall health of a region's visitor industry. However, by the time the proposed hotel is completed, California is expected to have experienced a gradual economic recovery and occupancy rates in Santa Barbara should increase to a market equilibrium of approximately 70 percent. In addition, as the local economy and tourism industry gain strength, attractive room discounts and bargain travel packages may not be as plentiful. As such, it is not likely that the proposed hotel will offer reduced room rates in order to compete with lower priced hotel properties in the Santa Barbara market. In addition, the proposed hotel will be aimed at attracting a select clientele which is not as budget oriented as other travelers.

Furthermore, the proposed hotel will not add a significant amount of new inventory to the existing lodging facilities in Santa Barbara. The luxury hotel will have 150 rooms and will increase the total number of rooms in Santa Barbara by only 4.7 percent.

The proposed 150-room hotel, which is the focus of this analysis, is estimated to cost $35 million or $233,000 per room to build. It is projected that the hotel would have an effective room rate in excess of $200 per night. The Parker Family Trust intends to make the hotel a top luxury property in the South Coast market.

The impact discussion can be separated into three areas: impact on the higher quality hotels, impact on the smaller hotels and motels along East and West Beach, and competition for hotel workers.

3.1 Impact On Higher Quality Hotels

The primary impact of this luxury hotel would be to shift a small portion of the higher quality demand from areas such as Palm Springs and San Diego to the South Coast Area. However, the new hotel may be marketed aggressively during the first year or two after completion and before the property is well established. This aggressiveness could divert some room nights away from the Biltmore and the Red Lion. As the new hotel is established, it would work in tandem with these higher quality hotels to strengthen the South Coast Area as a quality resort destination. Hotels like the Biltmore and Red Lion, which are likely to lose some room nights in the short-run, should benefit over the long-term from the stronger concentration of quality properties.

TABLE VIII-2

HOTEL REVENUE PER ROOM BY COMMUNITY, SOUTH COAST AREA

City/Area	1991 Room Revenue ($000)	Number of Rooms	Revenue per Room
Santa Barbara	$52,861	3,182	$16,613
Goleta	10,607	467	22,713
Montecito	16,926	556	30,442
Carpinteria	4,737	488	9,707
TOTAL SOUTH COAST	**$85,131**	**4,693**	**$18,140**

Source: Santa Barbara Convention and Visitors Bureau, and Economics Research Associates.

3.2 Impact On Smaller East and West Beach Properties

The proposed luxury hotel will have an exceptionally high level of service, superior amenities, expensive pricing, and will be targeted to a very select clientele. As such, ERA expects the new luxury hotel to have little or no impact on the room rates or occupancy rates of the smaller properties along East and West Beach in the short-run. The completion of this high quality facility, at such a central Waterfront location, would encourage the maintenance and upgrading of the smaller nearby properties. Over time, the Waterfront would become a somewhat higher quality area for both visitors and residents.

There is, however, very little risk that a majority of the Waterfront would become an enclave for wealthy visitors. Most of the existing properties are constrained as to the extent that they are able to move "up market" by small room sizes, lack of land area to provide landscaped grounds or extensive amenities and too few rooms to support restaurants, services or marketing budgets. Any up market movement of the Waterfront Area induced by the new hotel would be offset by the construction of the 75-bed youth hostel which is expected to charge between $15 to $20 per person per night. The hotel and hostel projects combined would broaden the cross-section of visitors who are able to lodge in the Waterfront Area of Santa Barbara.

3.3 Competition For Hotel Workers

In 1989, the unemployment rate in Santa Barbara County was below four percent and competition for hotel workers was an issue of concern. As shown in Figure VIII-2, the unemployment rate in Santa Barbara County has climbed steadily, allowing for seasonal variations, to just under eight percent in late 1992. In three years, due to the recession in California and the nation, the number of unemployed workers in Santa Barbara County has increased from approximately 7,000 to over 14,000. Since the new hotel would require only about 281 employees, competition for workers should not be an issue. During a time of high unemployment, the new hotel instead would provide much needed job opportunities.

4.0 Impact on City's Fiscal Position

In order to fairly evaluate the impact of this project on the City of Santa Barbara's fiscal position, ERA compared the project to several alternative uses of the site identified in the EIR. These include the following:

1. The **No Project Alternative** where there is no change in the City's cost or revenue position.

2. **Reduced Project Alternative** where the hotel is reduced from 150 to 125 rooms and all other aspects remain the same.

3. A **Fiesta Park Alternative** which includes 67,300 square feet of retail or restaurant space, 9,000 square feet of office space and ten apartments.

4. A hypothetical **Plazuela Alternative** which ERA has defined to include 55,000 square feet of retail and restaurant space, 5,000 square feet of office space and 24 apartments.

5. **A Specific Plan Design Alternative** consistent with the existing Specific Plan has been defined to include 73,134 square feet of specialty retail space, 5,000 square feet of restaurant space, 1,500 square feet of walk-up restaurant space, and ten apartments.

These alternatives are described in more detail in the Alternatives Section.

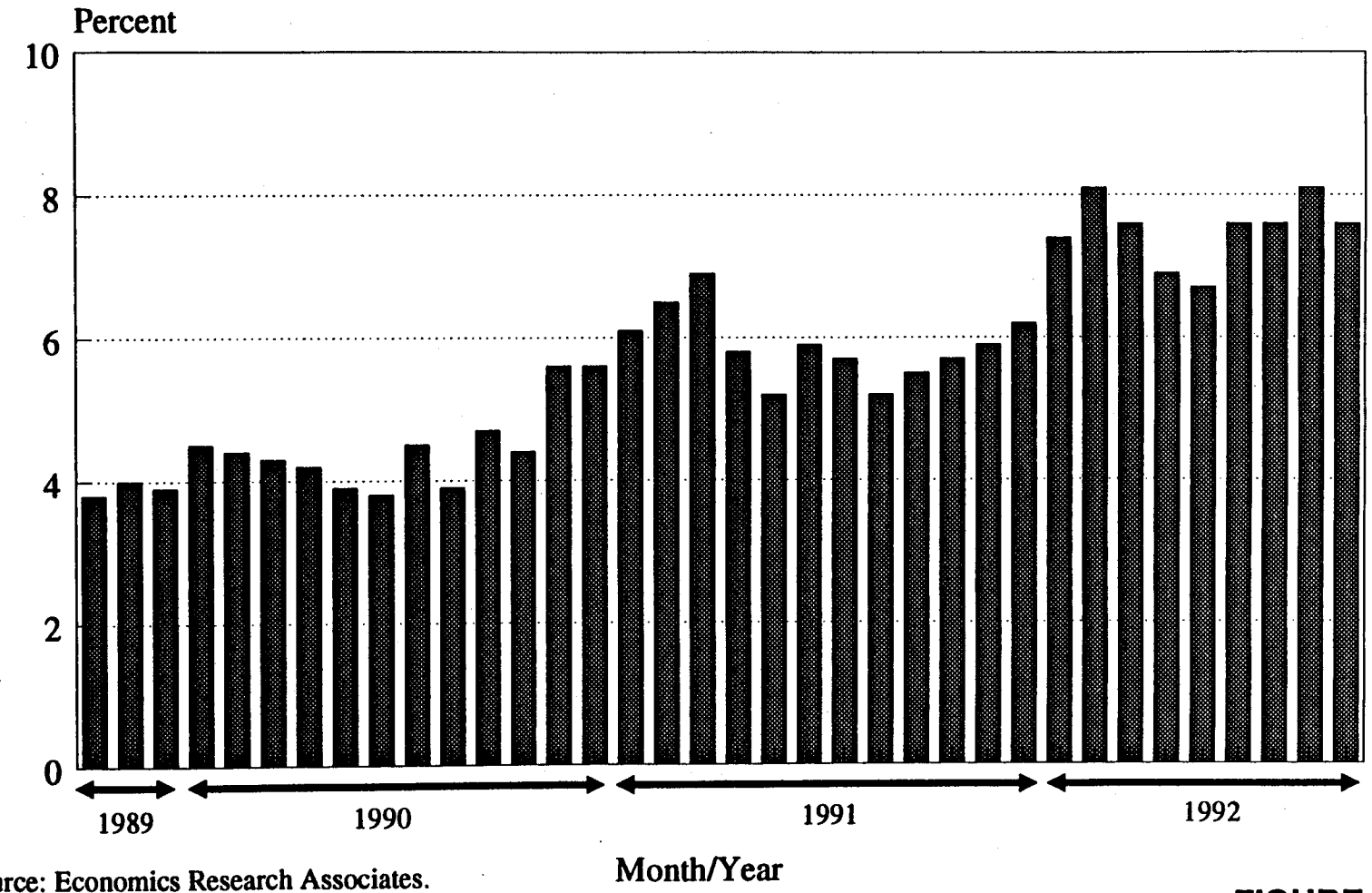
In the fiscal analysis, the service costs are determined by the number of residents, employees and visitors, who are the "consumers" of municipal services. The revenue is estimated from the net new sales taxes, transient occupancy taxes and property tax increments generated by the actual new development.

Using their extensive 1986 study, the Economic Implications of Alternative Growth Strategies for the City of Santa Barbara, ERA was able to update the General Fund service cost burden generated by each resident, employee and visitor. The number of residents, employees and visitors in Santa Barbara is shown in Table VIII-3, and the computation of their relative service cost burdens is presented in Table VIII-4. Each resident costs the City $469 in services per year. Each employee generates $247 in annual service costs and each visitor generates $192 in annual service costs.

The cost and revenue estimates of the development alternatives are shown in Table VIII-5. In this table, the annual new City service costs are subtracted from the annual new revenues to determine a net position. The Annual New City Costs in Table VIII-5 are determined by adding together the new annual service costs generated by new employees and visitors which would be created as a result of this project [(189 visitors x $192 cost/visitor) + (281 employees x $247 cost/employee) = $105,695]. The cost and revenue estimates assume that the project has reached a steady state condition, usually achieved three or four years after completion. This annual net cash flow is then capitalized into a one time value by a concept known as "capitalization". Basically, the capitalized value of a cash flow stream is the amount of investment capital needed to generate that annual cash flow at a specific rate of return. From the City's perspective, an 8.0 percent rate is reasonable. The annual net cash flow, divided by the 8.0 percent capitalization rate, determines the capitalized value of the project. Any anticipated Redevelopment Agency investment is then subtracted from this capitalized value. For one alternative, where project feasibility is questionable, an adjustment factor for the risk of being infeasible is applied. This is simply a factor which takes into account the overall feasibility of the proposed project alternatives. It represents a conservative approach which recognized that the type, size, mix of a project's components must be considered when determining project feasibility. It is a professional judgment since there are no set formulas or equations to arrive at the "correct" answer.

A risk factor of 1.0 was given to the Luxury Hotel project, Fiesta Park, Hypothetical Plazuela, and Specific Plan alternatives. This does not imply that these projects will have a 100 percent success rate. It simply means that there were no factors identified which would render feasibility of the project questionable. For Reduced Project Alternative, a risk factor of 0.7 was applied.

Unemployment Rate, Santa Barbara County
October 1989 - September 1992



Source: Economics Research Associates.

FIGURE VIII-2

TABLE VIII-3

SANTA BARBARA AVERAGE DAILY POPULATION IN 1992

City of Santa Barbara	Average Daily Population
Residents	87,000
Employees	47,000
Visitors:	
From Hotel Rooms [1]	3,007
Staying with Friends/Relatives [2]	2,345
Day Visitors [3]	4,601
TOTAL AVERAGE DAILY VISITORS	**9,953**

[1] 3,182 rooms at 70% occupancy and 1.35 persons per room.
[2] 78% of hotel visitors.
[3] 153% per hotel visitors.

Source: City of Santa Barbara and Economics Research Associates.

TABLE VIII-4

ANALYSIS OF PRO RATA FISCAL COSTS AND REVENUES, CITY OF SANTA BARBARA

Estimated Number of Consumers of Municipal Services:

1992 Residential Population	87,000
1992 Jobs Within City Limit	47,000
Average Daily Visitors 1992	10,000

General Fund Expenditures By Major Budget Category	Actual FY 1991-92 Service Cost	Cost Ratio per Resident/ per Employee	Cost Ratio per Visitor/ per Employee	FY 1991-92 Service Cost		
				Per Resident	Per Employee	Per Visitor
General Government	$7,597,492	1.5 / 1.0	0.5 / 1.0	$62	$42	$21
Protect. of Pers. & Prop.	$23,940,278	2.0 / 1.0	1.0 / 1.0	$207	$104	$104
Public Works	$6,326,037	1.5 / 1.0	1.0 / 1.0	$51	$34	$34
Community Services	$12,464,538	2.5 / 1.0	0.5 / 1.0	$116	$46	$23
Community Development	$4,015,285	1.5 / 1.0	0.5 / 1.0	$33	$22	$11
TOTAL EXPENDITURES	$54,343,630	1.9 / 1.0	0.8 / 1.0	$469	$247	$192

Source: City of Santa Barbara Annual Financial Report Year End June 30, 1992 and Economics Research Associates.

TABLE VIII-5

FISCAL REVIEW OF ALTERNATIVES, CITY OF SANTA BARBARA

Fiscal Component	Alternatives				
	Luxury Hotel Project	Reduced Project	Fiesta Park	Hypothetical Plazuela	Specific Plan
Land Uses					
Hotel (Units)	150	125	0	0	0
Residential (Units)	0	0	10	24	10
Retail/Restaurant (Sqft)	4,694	4,694	67,300	55,000	79,634
Office (Sqft)	0	0	9,000	5,000	0
People					
Employees	275	235	186	142	177
Residents	0	0	20	48	20
Visitors	189	158	0	0	0
Annual New City Revenues					
Sales Tax	$20,178	$16,211	$58,888	$57,750	$65,698
Hotel Tax @ 10.0%	672,604	540,383	0	0	0
Property Tax Increments	450,000	375,000	125,350	114,500	129,451
Total New City Revenues	$1,142,782	$931,594	$184,238	$172,250	$195,149
Annual New City Costs					
General Fund Services	$104,213	$88,285	$55,212	$57,641	$53,090
Annual Net Position	$1,038,569	$843,309	$129,025	$114,609	$142,059
Capitalized Value @ 8%	12,982,111	10,541,362	1,612,816	1,432,614	1,775,735
Adjustment for Feasibility Risk	1.0	0.7	1.0	1.0	1.0
NET CITY POSITION	$12,982,111	$7,378,954	$1,612,816	$1,432,614	$1,775,735

Source: City of Santa Barbara, Interface Planning and Counseling Corporation, and Economics Research Associates.

The results from the analysis are as follows:

1. For the **Luxury Hotel Project Alternative**, the analysis shows a net City position (or capitalized value) of nearly $13.0 million.

2. For the **Reduced Project Alternative**, which is a 125-room luxury hotel, ERA applied a 0.7 adjustment factor to reflect the significantly greater feasibility risk. A first-rate luxury hotel needs a "critical mass" or a sufficient number of rooms to support its restaurant, numerous services, non-departmental staff and marketing efforts in an efficient manner. The 125 rooms proposed is probably near the lower limit of feasibility. After this adjustment, the net City position is approximately $7.4 million.

3. Because it generates no hotel taxes and a lower tax increment than the proposed project, the **Fiesta Park Alternative** provides a net City position of only $1.6 million.

4. The **Hypothetical Plazuela Alternative** is similar to the Fiesta Park Alternative in that it generates no hotel taxes and only a minimal amount of property tax increments compared to the proposed project. Compared to the Fiesta Park Alternative, the Hypothetical Plazuela has more emphasis on residential as opposed to commercial land uses. It provides a net City position of $1.4 million.

5. The **Specific Plan Alternative** generates no new hotel tax revenue for the City and only a relatively small amount of property tax increments compared to the proposed project. This alternative is comprised primarily of specialty retail space and is projected to have a lower retail sales per square foot compared to the Fiesta Park and Hypothetical Plazuela Alternatives. Although specialty retail centers or festival marketplaces were popular in the 1970's, many are not doing well in today's recessionary environment. The trend for the future appears to be geared toward discount outlets and a more budget conscious shopper. The Specific Plan Alternative is expected to provide a net City position of $1.8 million. It should be noted that the ability to complete this project is questionable because of the $6 million cost of constructing the subterranean parking garage.

5.0 Conclusions

The proposed Waterfront Hotel would have a strong positive impact on the economy of the South Coast Area and the future fiscal position of the City of Santa Barbara. This project would contribute the following:

- Strengthen the tourism sector of the South Coast economy.

- Provide construction jobs during a recession and approximately 281 long-term jobs to the South Coast Area which has experienced a doubling of unemployment over the past three years.

- Physically upgrade a blighted central Waterfront Area.

- Encourage maintenance and upgrading of surrounding properties.

- Provide the City of Santa Barbara and its Redevelopment Agency approximately one million dollars per year in net additional revenue. This revenue would be critically needed by Santa

Barbara to service its population and improve the community in the years to come.

- Facilitate the development of a ten-acre Waterfront park which can be enjoyed by residents and visitors alike.

- Provide for a 75-bed youth hostel which allows visitors of modest means a place to lodge when visiting Santa Barbara.

It is ERA's conclusion that the proposed project would have a substantial, beneficial fiscal and economic impact on the community.

IX. OTHER CEQA CONCERNS

According to Section 15127 of the CEQA Guidelines, information concerning short-term uses versus long-term productivity and significant irreversible environmental changes need be included only in EIR's prepared if the project includes the adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency. As a result of the proposed project's request for an amendment to the existing Specific Plan, this EIR addresses the relationship between short-term uses versus long-term productivity, and any significant irreversible environmental changes resulting from the development of the proposed project.

A. SHORT-TERM USES VS. LONG-TERM PRODUCTIVITY

1.0 Park and Hotel Site

Short-term uses of the park and hotel site are primarily associated with the following activities: storage compounds for local businesses, administrative offices for the City's Waterfront Department and undeveloped open space. Approximately one third of the 13 acre site is currently being utilized as either storage or as administrative offices. The remaining two thirds of the site is considered undeveloped open space. Although the majority of the site is comprised of undeveloped open space, approximately one half of the project site is inaccessible to the public, as a result of existing chain link fences. The remaining portion of the site that is currently accessible to the public is littered with unwanted articles, such as car tires, old clothing, trash, shopping carts, etc. In addition, numerous homeless people utilize the site's eucalyptus grove and other dense vegetation to store their belongings and for sleeping purposes.

Long-term land use of the proposed park and hotel site would include the development of a 150 room luxury hotel and a 10 acre public park. Development of the proposed park and hotel site would displace all short-term storage uses and the Waterfront Department's administrative offices and would require the removal of numerous trees. Although the proposed park and hotel would not create a net increase in the site's overall open space, the amount of usable open space currently available to the public would increase with the development of the proposed 10 acre public park portion of the site and the removal of the existing chain link fence, which encompasses approximately one half of the site. In addition, the 10 acre public park portion of the site would provide a much needed nearby recreational facility for the City's East Side area. According to the 1989 Park and Recreation Facility Needs Assessment, the City's East Side area currently has an insufficient amount of local recreational facilities. The development of the proposed park portion of the site's flower gardens, Lagoon, Carousel and various individual elements would change the existing visual appearance of the site. However, the long-term change in the existing visual condition would be considered a beneficial visual change to the site and the surrounding area, as a result of the existing poor visual condition of the site (refer to Aesthetics Section for further information on visual impacts). The old City pump and screen plant which exists on-site, and currently provides the City's Waterfront Department with administrative offices, would be incorporated into the proposed park portion of the site to provide storage and office space for City park employees and a recreational facility for the public.

The justification for proposing development of the site at this time, rather than reserving the site for future alternative development, is primarily associated with the following reasons: 1) the restoration of the site's present dilapidated condition, which is considered a visual blight within the City's scenic Waterfront Area;

2) the present demand for a luxury hotel within the City of Santa Barbara, which currently does not capture its fair share of the luxury hotel demand in California;[90] 3) the demand for additional local and community-wide recreational facilities near the Eastside, which presently lacks an adequate amount of local recreational facilities; and 4) the proposed project's land use compatibility with the site's surrounding land uses (i.e., parks, hotel and restaurants). In addition, the proposed park and hotel site has been proposed for similar types of development since 1977 when the original Park Plaza Project underwent environmental review. However, the projects previously proposed for the park and hotel site over the last 15 years did not offer a significant public recreational benefit as does the currently proposed 10 acres of public park and open space.

2.0 Hostel Site

Present short-term uses of the hostel site (33 W. Montecito Street) are reflective of the site's previous development history. Although the hostel site is presently undeveloped, the site has a long history of previous development, the most recent being a Shell Oil Company Service Station. The Shell Gas Station was demolished and the underground diesel and gasoline storage tanks were removed and disposed of off-site in 1989. Since that time, the site has remained undeveloped, unvegetated open space, which remains the sole short-term use of the site.

Long-term uses of the proposed hostel site, as envisioned, would consist of a 75 bed hostel and 27 space parking lot. Development of the proposed hostel would convert the existing undeveloped but previously disturbed open space use into a long-term hostel use. It should be noted that there is now a hostel at 409 State Street in the Savoy Hotel building.

The justification for proposing development of the hostel on this site at this time, rather than reserving the site for future alternative development, is primarily associated with the following reasoning: existing California Coastal Commission Conditions of Approval placed on the proposed park and hotel site require the development of a "low-cost", visitor-serving accommodation (i.e., youth hostel) within the Waterfront Area between Castillo Street to the west and the Santa Barbara Cemetery to the east. Therefore, the proposed hostel must be developed within the area mentioned above if 3.0 acres of development on the proposed park and hotel site is to be approved.

B. IRREVERSIBLE ENVIRONMENTAL CHANGES

1.0 Park and Hotel Site

Approval of the proposed park and hotel on the subject site has the potential to create the following significant irreversible environmental changes:

- Long-term loss of unplanned/disturbed open space
- Long-term loss of mature trees/shrubs
- Long-term change in the existing visual condition of the site
- Long-term generation of significant air quality impacts

[90] Kenneth Leventhal & Company, Preliminary Market Overview of Proposed 150-Room Luxury Hotel in Santa Barbara, California, September 1991 and Economic Research Associates, Economic and Fiscal Review of Proposed Waterfront Hotel, Dec. 92.

The long-term loss of undeveloped/disturbed open space would be replaced by approximately 10 acres of usable public open space (proposed park portion of the site) and a 150 room luxury hotel. It should be noted that the proposed park portion of the site would provide more usable public open space/recreational facilities than currently exist on site, which would create a public recreational benefit. The loss of 98 trees/shrubs would change the existing visual character of the site from a primarily disturbed but unplanned open space to that of an intensely landscaped active and passive public open space and luxury hotel. This tree removal would be offset by the introduction of 441 new trees, as well as other landscaping, resulting in only a short-term loss of mature trees and shrubs.

Development of the proposed park and hotel would directly increase energy demands on-site (e.g., electricity, natural gas, etc.). Due to the non-renewable nature of most energy sources and air quality impacts associated with their use, the potential exists for adverse environmental changes to occur from increased energy demands associated with the proposed park and hotel site. According to the proposed project's Initial Study (Appendix A) which was prepared by the City's Community Development Department, it is well within the ability of the various utility companies to provide the necessary energy resources. In addition, the proposed project's consumption of these resources would be reduced by the applicant's proposed energy conservation program, which is required by the site's Specific Plan. The proposed project has been identified to produce long-term automobile related emissions above the threshold of significance. Such emissions will contribute to ozone violations in the County and generally frustrate air quality improvement goals. Every effort should therefore be made to limit single-occupancy auto use by employees of the project, including preparation of a Transportation System Management Program (TSMP). The applicant has prepared a Visitor Information Program, as required by the Specific Plan, to educate guests on all alternative means of reaching a specific destination. Implementation of the energy conservation program, TSMP and Visitor Information Program should decrease the hotel and park site's energy consumption.

2.0 Hostel Site

Irreversible environmental changes associated with the proposed hostel would not be anticipated to occur. The proposed hostel site has been previously developed with numerous uses, the most recent being the Shell Oil Company Service Station which was demolished in 1989. Although the proposed hostel site is currently open space, the site is heavily disturbed with very limited vegetation existing on-site. In addition, the site is presently zoned Hotel and Related Commerce 2 (HRC-2), which allows the development of a hostel.

Development of the proposed hostel would directly increase current energy demands on-site. However, utilities have served the site since 1930 when the site was used as an auto sales and repairs business. Although the proposed hostel would be a more intense visitor-serving use than the recently demolished Shell Gas Station, potential adverse environmental impacts resulting from increased energy demands associated with the proposed hostel could be minimized. In order to minimize this potential increase in energy demand:

- Lighting needs and priorities for different periods of day and night shall be established.
- Alternative lighting fixtures with the most effective energy savings shall be used to the extent feasible.
- All walls, ceilings and ground floors (if elevated) shall be insulated.

It should also be noted that the majority of visitors who typically use a hostel arrive by mass transit (train or bus), bicycle or foot.

X. GROWTH INDUCEMENT

Growth inducing concerns are those characteristics of a project that tend to foster or encourage population and/or economic growth. Inducements to growth include the generation of construction employment and permanent opportunities in the support sector of the economy. The proposed Waterfront Park project could result in three types of growth-inducing impacts: 1) the creation of short- and long-term employment opportunities to draw newcomers to the region; 2) the associated increase in affordable housing demand; and 3) the generation of new recreational and tourist accommodation opportunities to entice people to the area.

1.0 Employment Generation

1.1 Short-term Employment Generation

Development of the proposed project would generate some short-term, construction-related employment. The construction phase of the project would require a limited labor force due to the relatively short-term nature of construction employment. Given the ample supply of construction workers in the local work force, it is likely that a large number of these workers could come from within the South Coast area. In addition, the unemployment rate in Santa Barbara County has climbed steadily in recent years. The number of unemployed workers in the County has increased from approximately 7,000 to over 14,000 in the last three years due to a recession in California and the nation. (See the Economic and Fiscal Analysis Section for more detail.) It should also be noted that City Staff has indicated that it is likely that high unemployment is inclined to continue for another two to four years. Therefore, given the high availability of local workers, the proposed project would not be considered to be particularly growth inducing from a short-term employment perspective.

1.2 Long-term Employment Generation

The proposed project envisions a 150-room hotel, a 75-bed hostel and a ten acre public park. It is anticipated that the development of the Waterfront Park Project would create approximately 184 equivalent full-time employment positions. It is estimated there would be a total of 281 actual full-time and part-time employees. The majority of the positions (approximately 90%) are anticipated to be filled by the local labor force. (See the Economic and Fiscal Analysis Section and Subsection 2.0 below for more detail.) Management positions, however, may involve recruitment procedures with a target area which is larger than the local region. This could induce a limited number of newcomers to the area.

2.0 Population Generation and Housing

The hotel component of the project may attract some permanent residents to the area. Filling the managerial positions at the hotel may bring permanent residents to the area. Other hired employees would likely represent a mix of both current residents and newcomers to the area. Newcomers would most likely experience difficulty in finding affordable housing given the average sales prices of the majority of Santa Barbara residences (in the "market" range of HUD Housing Price Standards). Therefore, there is a need to provide affordable housing for those employees who relocate to Santa Barbara as a result of this project.

The proposed project is anticipated to generate an overall employee population of approximately 281 persons. Usually the Regional Growth Impacts Study (RGIS), prepared for the Santa Barbara County Board of Supervisors in July 1980, is used to calculate the number of employees that would be hired from outside the South Coast area and the associated amount of affordable housing demand created by a project. However, because the RGIS is focused on office, light industrial, research and development, and retail uses, City staff has concluded that it is not the appropriate formula to use in determining affordable housing generation for hotels. Hotels generate a much higher percentage of low income workers than is allowed for in using the RGIS formula. Therefore, the City Community Development Director approved use of an alternative methodology in which affordable housing demand was calculated based on employment information obtained from the Red Lion Resort and the Four Seasons Biltmore Hotel. These two hotels were selected because they are local hotels of similar size and quality to the proposed Waterfront Hotel. The hotel industry is primarily service-oriented, providing housekeeping, food service, maintenance, groundskeeping and similar employment opportunities with a small percentage of managerial level positions which exceed the moderate income level. This assertion was confirmed by contacts at the Biltmore Hotel, Red Lion Resort and Economic Research Associates.

Mr. Mitch Sipiala, Assistant Director of Human Resources at the Biltmore, indicates that the Biltmore employs approximately 550 persons year round.[91] Of the 550 employees, 60 are managers or supervisors and the rest are service-level employees. Approximately 90% or 54 of the managers/supervisors were recruited from outside Santa Barbara. Local residents are hired to fill approximately 85% of the 490 other available positions. Mr. Sipiala said that most of the employees who come from outside Santa Barbara have moved here for some reason other than the job they are filling, such as relocation because of a spouse. In addition, Mr. Sipiala asserts that the high cost of living in Santa Barbara, coupled with relocation costs and lower wages overall, serve to deter people from moving here to fill a service-level position. Of the entire 550-person staff, Mr. Sipiala said approximately 50 managers make more than $45,000 per year. Therefore, 100% of the non-management staff and 16.67% of the management staff fall into the low- or moderate-income category. In regard to the Waterfront Hotel, Mr. Sipiala anticipates that a large portion of the management positions would be filled by people with hotel-related experience from outside Santa Barbara and that almost all service-level positions would be filled by local residents.

Mr. Robert Lapso, Controller for the Red Lion Resort, indicates that the resort currently employs 400 people and employs a maximum of 450 people during the summer's peak tourist months.[92] Of the 400 employees, 45 are managers and approximately 30 managers were recruited from outside Santa Barbara. According to Mr. Lapso, approximately 99% of all other positions are filled by local people because the low wages ($5.00 - $9.00 per hour) are not enough of an incentive for people to relocate to an area with a high cost of living. Of the entire 400 person staff, all but approximately 5 managers make less than $45,000 per year. Therefore, 100% of the non-management staff and 88.89% of the management staff fall into the low- or moderate-income category. In regard to the Waterfront Hotel, Mr. Lapso feels that in a realistic case approximately 65% of the 23 new management positions would be filled by people from outside Santa Barbara. Mr. Lapso felt that all but seven of the other positions would be filled by local people. Given the high level of unemployment in Santa Barbara and the many college students who fill part-time positions, Mr. Lapso feels there are ample human resources available in the South Coast area to accommodate the Waterfront Hotel.

[91] Personal Communication with Mitch Sipiala, Assistant Director of Human Resources for the Four Seasons Biltmore Hotel on February 16, 1993.

[92] Personal Communication with Robert Lapso, Controller with the Red Lion Resort, on February 8, 1993.

The assertions made by Mr. Lapso and Mr. Sipiala regarding employment generation are similar to the projections made by ERA in their economic and fiscal impact analysis (see Section VIII.). Given that three credible sources have provided similar information on future hotel employment generation, the report preparers feel the information is valid.

Using the information obtained, approximately 52.78% of the Waterfront Park's 23 managers, or 12.14 people, would fall into the low- or moderate-income category.[93] It is assumed that 78.34% of the Waterfront Hotel's 12.14 low- or moderate-income managers (approximately 9.51 people) would be induced into the South Coast area by way of employment opportunities.[94] All service level, non-management employees at the Waterfront Hotel are assumed to be in the low- or moderate-income category, as is the case at the Biltmore Hotel and Red Lion Resort. Based on the information provided, it is assumed that 20.64 non-management employees would be induced into the South Coast.[95] Thus, a total of 30.15 low- or moderate-income employees may be induced to move to the South Coast area as a result of the proposed hotel's employment opportunities. These assumptions are considered realistic for this project because the City is currently experiencing a period of high unemployment and because it has been demonstrated that a majority of the new employment positions would be filled by local residents. The City estimates that one affordable housing unit is needed to accommodate every 1.4 low- or moderate-income employee. By applying this factor, it was determined that these 30.15 employees would require 22 affordable housing units. Impacts associated with this form of growth inducement would be considered adverse if they would increase demands on current public infrastructure and housing supply. This increased demand for affordable housing could cumulatively affect the City's housing stock. However, the project applicants are required to meet the provisions of the City Housing Mitigation Ordinance as part of Development Plan approval. In essence, adherence to the City Housing Mitigation Ordinance becomes part of the project description. The project applicants have the option under the ordinance of choosing to provide construction of affordable housing off-site or payment of in-lieu fees. The applicants indicated in their project application that they are prepared to comply with any housing impact mitigation required under Chapter 28.87.300 of the City Municipal Code. Therefore, no adverse impacts to housing are anticipated to occur.

3.0 Visitor Generation

Development of the proposed project would increase the recreational opportunities and tourist accommodations which may entice people to the area. The Chamber of Commerce estimates that approximately five million people visited Santa Barbara in 1992.[96] It is assumed that the proposed hotel

[93] This average percentage was derived from the number of low- or moderate-income managers at the Biltmore Hotel and Red Lion Resort as follows. 16.67% at the Biltmore Hotel are in the low- or moderate-income range and 88.89% at the Red Lion Resort are in the low- or moderate-income range. The average of the two figures is 52.78%.

[94] This is the average percentage of managers hired by the Biltmore Hotel and Red Lion Resort from outside the Santa Barbara area [(90.0% + 66.67%) divided by 2 = 78.34%].

[95] Mr. Sipiala of the Biltmore said that 15% of their non-management employees come from out-of-town and Mr. Lapso of the Red Lion said only 1% of their employees come from out of town. Thus, the average number of non-management employees that may move to the South Coast as a result of this project is: (15% + 1%) divided by 2 = 8%. 281 total employees minus 23 management employees = 258 non-management employees. 258 non-management employees multiplied by 8% average induced employee factor = 20.64 induced non-management employees by the Waterfront Hotel.

[96] The annual number of visitors includes day trips, overnight trips and people staying with relatives or friends.

would attract approximately 50,000 visitors who would not otherwise come to Santa Barbara.[97] The number of new visitors generated by the proposed hotel amounts to a one percent increase in the area's annual number of tourists. Tourism is recognized as a vital part of the economy of Santa Barbara in the Central City Redevelopment EIR Technical Document. **In this regard, a one percent increase in the annual number of tourists is considered a beneficial impact.** Increases in the number of tourists also would result in increased tourist use of, and visits to, visitor-oriented sites and facilities.

[97] The proposed hotel includes 150 rooms. Assuming there would be 1.26 people per room, the hotel would generate 189 visitors per day. Applying an average annual occupancy rate of 70% yields 48,290 visitors per year (189 visitors/day X 365 days/year X 0.70 occupancy rate).

XI. ALTERNATIVES

A. INTRODUCTION

According to Section 15126 (d) of the State CEQA Guidelines and recent court cases, environmental impact reports must: "Describe a range of reasonable alternatives to the project, which could feasibly attain the basic objectives of the project. . ." Further, the Guidelines state: "The discussion of alternatives shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." This section also requires the identification of the environmentally superior alternative, other than the no project alternative.

In response to comments raised during the circulation of the Draft EIR, the Alternatives Section has been revised and reformatted. The following revised section now includes discussion of an additional alternative known as the "Alternative Project Design Consistent with the Specific Plan". Furthermore, the "Alternative Use Allowed Under the Specific Plan" and the "Alternative Use/Plazuela Concept" discussions which were included in the Draft EIR under XI. A have been moved to "Alternatives Previously Discussed" which is now Section B of this Alternatives analysis.

For this project, the following alternatives have been analyzed:

- No Project Alternative
- Alternative Project Design
- Alternative Project Design Consistent with the Specific Plan
- Alternative Project Sites
- Alternative Park Programming

The purpose of this section is to describe feasible alternatives and to evaluate the ability of each alternative to reduce or avoid significant or adverse impacts. The reader is referred to the individual sections of the EIR and to Section II, the Executive Summary, for a detailed discussion of the levels of significance in each issue area. Briefly, the project would result in Class I, unavoidable, significant short-term and long-term air quality impacts, Class I, unavoidable, significant short-term parking impacts related to the park component of the project, Class I, unavoidable, significant noise impacts to park users and Class I short-term visual impacts. Therefore, this alternatives analysis is focused on how, if feasible, to reduce the short-term and long-term air quality impacts and indirectly how to further reduce adverse traffic, visual and noise impacts or otherwise avoid the need to impose project specific mitigation measures.

1.0 "No Project" Alternative

The "No Project" alternative represents the "status quo", maintaining the project sites in their current state, vacant and/or partially utilized for storage. No new environmental effects would directly result from the selection of this project alternative. Maintenance of the project sites in their present state would allow current uses of the two sites to continue. The hotel, hostel and park sites would remain vacant and undeveloped. Because the sites would not be developed, Class I air quality impacts and all other adverse environmental impacts associated with the proposed project would be avoided. This alternative would also avoid all beneficial impacts of the project (i.e., the provision of a youth hostel, the recreational and community benefits associated with the proposed ten acre park and the fiscal benefits of a luxury hotel).

From a regional or City-wide standpoint, this alternative would preclude the proposed project from contributing to current cumulative problems such as air quality, increased traffic congestion, etc. At the same time, maintenance of the park and hotel site in its present state would not improve a currently blighted, unproductive area nor would it increase sales or property tax revenues, or contribute significant tax increment flow to the Redevelopment Agency. Furthermore, the soil remediation plans for both the hostel and hotel sites may not be achieved in an expeditious manner if the project does not go forward. Lastly, this alternative would not accomplish the objectives of the applicants.

2.0 Alternative Project Design

This alternative would reduce the scale of the hotel component by decreasing the size from 150 rooms to 125 suite rooms. The 125 suite room alternative would also be a luxury hotel, on a comparable level to the proposed project. The park and hostel components would remain the same as for the proposed project. Under this alternative, the same three acres of land would be utilized for the hotel and the building envelope and gross floor area would generally remain the same. Each of the suite rooms would be larger than the rooms envisioned in the proposed project, and any slight reduction of the building envelope would be dedicated to surface parking or additional landscaping. A hotel with 125 suite rooms is considered the smallest potentially viable hotel size the site could support, from an economics standpoint.

A two-story hotel configuration on the site would necessitate expansion of the hotel footprint into the additional 0.4 acre area permitted under the Coastal Development Permit for the site. Under the 150 room luxury hotel proposal, the Parker Family Trust has chosen to forego the development of the 0.4 acre parcel, and to give the title of this vacant developable area to the City for additional park land. By agreement with the City, if the proposed third story element is not allowed, the Trust can develop the entire 3.4 acre commercial parcel as permitted, and will dedicate 4.543 acres instead of 4.943 acres of the land to the City. If the 125 suite hotel is implemented, the Parker/City agreement would be void and Parker would be able to develop the entire 3.4 acre site.

From a mitigation perspective, this alternative would not necessarily result in significantly reduced environmental impacts. A 125-room hotel (135,000 gross square feet) would result in slightly less traffic (15%) and long-term air quality impacts. In addition, there could be an opportunity to marginally decrease visual impacts (i.e., reduction of building bulk) of the proposed 150-room hotel. Significant long-term and short-term air quality impacts would remain the same (i.e., Class I or unavoidable) with development of either the 125 suite room hotel or the proposed 150-room hotel, as would parking impacts in the park portion of the site and short-term visual impacts associated with the removal of mature trees and shrubs.

Portions of the proposed hotel component currently include a three story design. While it has been determined that the current bulk, scale and design of the proposed hotel building would not pose a significant visual impact (see Aesthetics Section), a redesigned suite-type hotel would be a maximum of two stories which could further reduce the already less than significant visual impacts of the project.

Regarding traffic impacts, a 150 room hotel would result in 1,575 average weekend traffic trips and a 125 suite hotel would result in approximately 1,313 trips. While the reduced density alternative would serve to reduce trips, neither alternative would be considered to result in a significant traffic impact due to the proposed extension of Salsipuedes Street. This extension would occur under either development scenario to reduce traffic impacts to less than significant levels.

Regarding air emissions, the proposed project would result in 3.9 pounds per peak hour of NOx and 4.1 pounds per peak hour of ROC. In that the APCD threshold is 2.5 pounds per peak hour, these reported levels would exceed the threshold, resulting in a significant long-term air quality impact. The reduced density project would result in 3.5 pounds per peak hour of ROC and 2.9 pounds per peak hour of NOx. Therefore, while the development of the alternative project design would slightly reduce long-term air emissions, emission levels would still remain above the APCD threshold. Therefore, the emissions generated by either the proposed project or the reduced density project would result in significant unavoidable impacts. In order to reduce long-term air quality emissions below the threshold, density would have to be reduced to 80 rooms. According to ERA, an 80-room hotel would not be an economically viable project.

Short-term, construction-related air quality impacts would remain the same (significant and unavoidable) for either the 150 room hotel or the 125 suite hotel alternative.

In summary, this alternative would serve to further reduce some of the impacts related to the project, even though short-term and long-term air quality impacts would remain significant and unavoidable with either project. Additionally, the other impact areas that are already less than significant with the proposed project would not be greatly reduced by the 125-room suite hotel. Furthermore, the 125-room suite hotel alternative would not meet the objectives of the applicant. According to the ERA Study (refer to Section VIII, Economic and Fiscal Impacts) that was prepared for this project, a 150-room hotel is economically viable and constitutes a realistic project. The reduced project with 125 rooms represents a significantly greater feasibility risk because a luxury hotel needs a sufficient number of rooms to support its restaurant, numerous services, non-departmental staff and marketing efforts in an efficient manner. Therefore, while this alternative may reduce some of the significant impacts, it is not a realistic development concept.

3.0 Alternative Design Consistent with the Specific Plan

The following alternative has been created and included in the Final EIR in response to comments raised during the circulation of the DEIR. Following the comment period, it was determined that discussion of an alternative which both reduces significant, adverse, long-term impacts and is consistent with the adopted Specific Plan should be included in the Final EIR. Therefore, in an effort to address the concerns raised and provide an environmentally superior alternative under the CEQA requirements, the following alternative is now included in this section.

This Alternative Design project was created by taking the 1987 revised Fiesta park project and its environmental impacts and working backwards to reduce the intensity of uses on the site in order to arrive at a project which does not result in significant long-term unavoidable impacts (those which exceed

Specific Plan thresholds or other planning thresholds [APCD]). The office use was deleted because it is not consistent with the adopted Specific Plan. The genesis of this alternative was accomplished by factoring the regulatory thresholds and desired uses into a spreadsheet and calculating the square footage for each land use that would not exceed the threshold limitations. A print out of the Alternative Scenario Forecaster spreadsheet is contained in Appendix H.

The Alternative Design Consistent with the Specific Plan includes 3.4 acres of retail, restaurant and residential land uses. This alternative would also include a 9.7 acre park/open space component. Commercial use for this alternative would be built on Parcel B, north of Cabrillo Boulevard and west of Salsipuedes Street. Structures would be limited to two stories with this alternative. Retail/restaurant uses would be on the ground floor and the ten residential units would be on the second floor. Specifically, the Alternative Design Consistent with the Specific Plan project would include the following components:

73,134 Square Feet of Specialty Retail
5,000 Square Feet of Sit Down Restaurant (150 seats)
10 Residential units (1,000 square feet/unit)
1,500 Square Feet of walk-up restaurant
9.7 Acres of passive Park Use

The above project statistics have been generated specifically to fit within the constraints of the site, including setback requirements, parking requirements, design standards and environmental thresholds. In comparison to the proposed project, this alternative does not include a hotel component and increases the retail/restaurant uses on site. In addition, the park component would differ from the proposed project in that the park under this alternative would be a passive/open space park instead of the active/recreational park included in the proposed project. The size of the park would be 0.4 acres less for this alternative compared to the proposed project, and the programming of the allowed park uses has changed to be less intense. The reason for this is twofold. First, the Parker Family Trust and the City have an agreement that allows the Parker Family Trust to build a third story on the proposed hotel if commercial development is limited to 3.0 acres instead of 3.4 acres allowed under the Specific Plan. This agreement is void if the proposed hotel is not developed, which means that 3.4 acres of the total 13.1 acre site could be developed with commercial uses. The balance of the site, or 9.7 acres, would be developed with a public park. Second, the Parker Family Trust will only contribute $125,000.00 per year towards park maintenance if a hotel is allowed on Parcel B. The $125,000.00 would be needed to maintain the active park uses such as the Great Meadow and to provide maintenance of the extensive landscaping, restrooms, fountains, and plaza, which are currently included in the proposed project park plans. These elaborate park components of the proposed project would not be developed without the maintenance fees contributed by the Parker Family Trust. In that this alternative eliminates the hotel component, the elaborate park uses would not be probable, therefore, due to the lack of maintenance fees available, the park has become more passive and open space in nature with this alternative design.

As noted previously, all environmental impacts associated with the Alternative Design Consistent with the Specific Plan would be reduced to fall below the thresholds. Specifically, traffic trips associated with the project would total 1,314 average daily trips, 84 Sunday peak hour trips and 125 Friday peak hour trips. Given that the adopted Specific Plan limits the amount of peak traffic trips associated with development at this site to a maximum of 192 PHTs, this alternative would fall below this Specific Plan requirement for both Sunday and Friday PHTs.

Omni Means, the traffic consultant for the project, prepared a brief analysis of the alternative's effects at

the critical intersections which can be summarized as follows:

Table XI-1

Intersection	Existing + Salsipuedes St. extension + Cumulative Base	Existing + Salsipuedes St. + Cumulative Base + Alternative
Cabrillo/101 (Sunday)	LOS C (V/C 0.799)	LOS D (V/C 0.801)
Milpas/101/Carpinteria (Friday)	LOS D (V/C 0.822)	LOS D (V/C 0.825)

The City has a threshold which states that a significant traffic impact would result if a project increases a roadway's volume to capacity (V/C) ratio by 0.01. As indicated in Table XI-1 above, the Alternative Design Consistent with the Specific Plan project would not increase the V/C over the 0.01 threshold. Therefore, this alternative would not result in any adverse impacts to the critical vicinity intersections. As is discussed in Section, VI. A, Traffic, Circulation and Parking, the extension of Salsipuedes Street as part of either this alternative or the proposed project would reduce adverse impacts on critical vicinity intersections. Additionally, the installation of a traffic signal at the Cabrillo/U.S. 101 intersection would improve its operating condition above existing levels. The Cabrillo/101 interchange is currently at LOS F at the Sunday peak hour and the Milpas/101 interchange is currently experiencing LOS D (V/C 0.85). Therefore, with the improvement of Salsipuedes Street, traffic would be improved to better than existing conditions.

According to the City of Santa Barbara Zoning Ordinance, the components of the Alternative Design Consistent with the Specific Plan project would require 342 total parking spaces. The parking would be accommodated by providing a 120,000-135,000 square foot subterranean parking garage below the main retail/residential structures on the eastern portion of the site. Preliminary investigation of the on-site soils indicate that a subterranean parking structure could be accommodated on this site, as is proposed by the present project. However, additional soils analysis would be required to ensure that proper mitigation measures are adhered to, should this alternative be chosen.

Regarding air quality impacts, this alternative would result in 2.18 lbs/peak hour of ROC and 2.49 lbs/peak hour of NOx. In that the APCD threshold is 2.50 lbs/peak hour, the alternative would not exceed the threshold and would not result in Class I unavoidable long-term air quality impacts. This alternative would, however, result in significant short-term air quality impacts related to dust generation during the grading and site preparation phases of the project. It should be noted that all of the projects considered on this site would result in significant short-term air quality impacts.

The reduction of density proposed, and the placement of structures for this alternative would result in reduced aesthetic impacts in comparison to the proposed project. The proposed project includes plans for the hotel to be three stories, 45 feet high. A minimum of 20% of the parcel would be dedicated to landscaping purposes. While the higher buildings would be placed on the northern portion of the lot to decrease visual impacts, views to the Riviera and the Santa Ynez Mountains would still be obstructed with the proposed project. Structures included in the Alternative Design consistent with the Specific Plan project would be two stories, approximately 30 feet high. The improved area (i.e., building footprint, and all paved areas) of the alternative project would be almost the same as for the proposed project; 80% coverage with the remaining 20% of the site as landscaped area. The retail/restaurant components of the alternative project would be on the ground floor and the ten residential units would be on the second floor. Similar to the proposed project, the alternative project would place the higher second story to the north end of Parcel B with the single story being located closer to Cabrillo Boulevard to decrease visual impacts

along Cabrillo Boulevard.

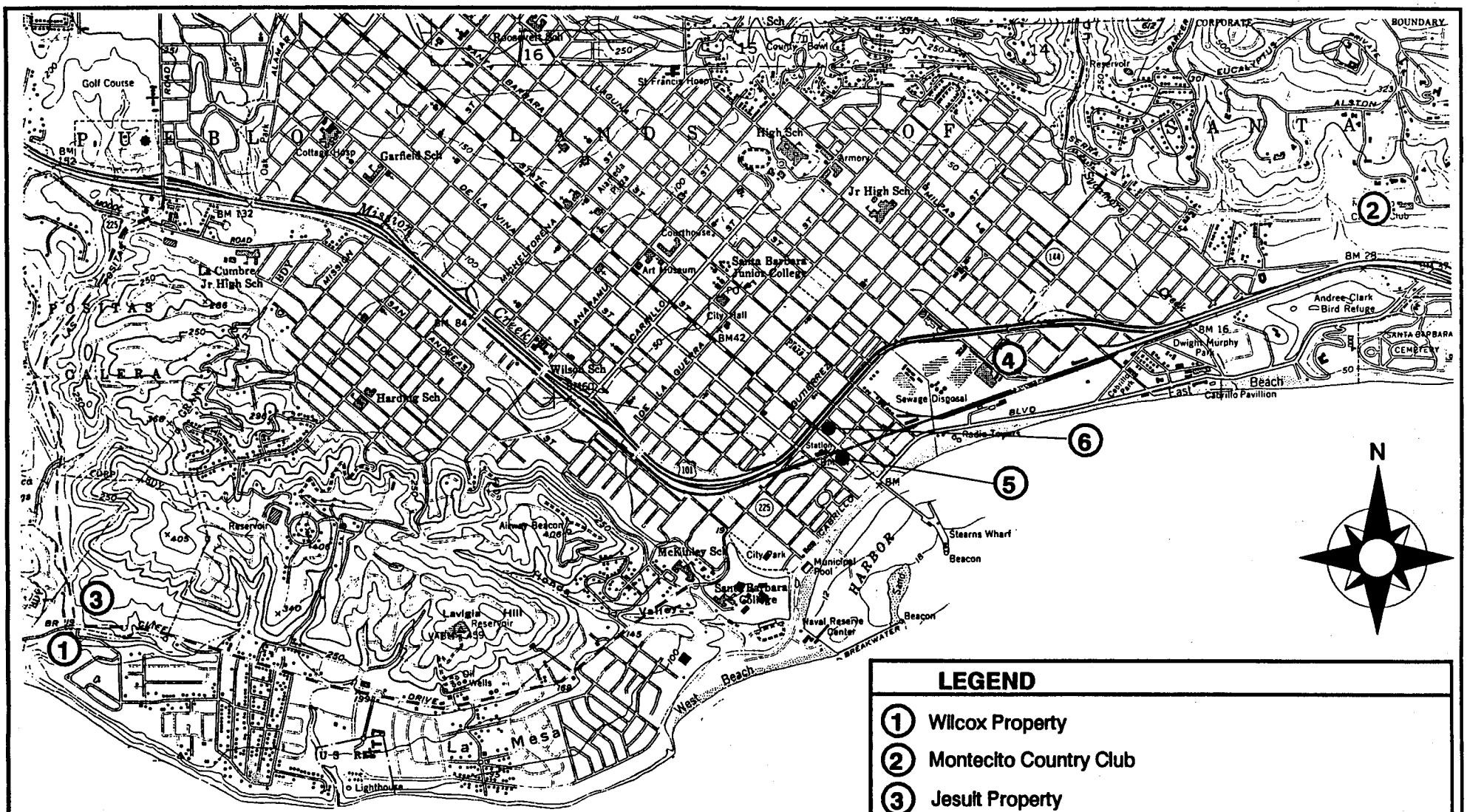
The visual analysis for the proposed project concludes that the aesthetic impacts are significant but avoidable and can be mitigated to less than significant levels. However, due to the fact that the Alternative Design Consistent with the Specific Plan project decreases the height of structures, visual impacts to mountain and Riviera views would be further reduced with the implementation of this alternative instead of the proposed project. It is likely that visual impacts would still remain Class II with the Alternative Design consistent with the Specific Plan project given that structures would still be built on a site which currently has unobstructed views to the Riviera. However, the alternative would result in less overall view blockage than the proposed project.

Biological, archaeological, noise, risk of upset, recreation, and hazardous materials impacts associated with the proposed project would be of a similar level with implementation of either the proposed project or the Alternative Design consistent with the Specific Plan project. It should be noted that the cost of a subterranean parking garage may make the project financially infeasible. The economic feasibility of the alternative has been discussed in Section VIII., Economic and Fiscal Analysis.

In summary, the Alternative Design Consistent with the Specific Plan would not result in any long-term Class I, unavoidable environmental impacts and would be successful in reducing the significant impacts associated with the proposed project. As such, this alternative would be considered to be the **environmentally superior alternative**.

4.0 Alternative Locations

Alternative locations are generally examined where implementation of the project at the proposed site would have unavoidable significant impacts or significant but mitigatable impacts, when such impacts could be reduced or eliminated by relocation of the development. It should be noted that the City of Santa Barbara has very few vacant parcels that would be appropriate for the development of a luxury hotel, while still providing the abundant open space which the proposed project site affords. The following section will examine potential development of the project at other alternative site locations for each of the three project components. For the hotel component, four alternative locations in the City have been examined including the Wilcox Property, the Montecito Country Club, the Jesuit property (Rancho Las Positas) and the Southern Pacific property north of the railroad tracks, south of U.S. Highway 101. For the park component, the Wilcox property and the Jesuit property will be examined. The youth hostel component of the project is required to be located in the Waterfront Area of the City. Therefore, two alternative sites have been examined for the hostel, including the vacant parcel on the west side of State Street, immediately adjacent to the south of the Southern Pacific Rail Road tracks, and the vacant land directly adjacent to the south of U.S. Highway 101, on the southeast corner of Helena and Montecito Streets. Refer to Figure XI-1, for the Location of the Alternative Sites. The following discussion will examine the environmental merits and trade-offs of each alternative location in comparison to the proposed project site.



LEGEND

1. Wilcox Property
2. Montecito Country Club
3. Jesuit Property
4. Southern Pacific Property (alt. hotel site)
5. Southern Pacific, State St. (alt. hostel site #1)
6. State & Helena St. - southeast corner (alt. hostel site #2)

NO SCALE

SOURCE: U.S.G.S Topographic Quadrangle, Santa Barbara, Photorevised 1988

FIGURE XI-1

ALTERNATIVE PROJECT SITES

INTERFACE

4.1 Hotel Alternative Locations

4.1.1 The Wilcox Property

The Wilcox property is comprised of approximately 70 acres of vacant land, located on the bluffs overlooking the Pacific Ocean at the southwest boundary of the City limits. This property has undergone several development proposals over the past twenty years. The most recent project proposed on this site is known as the Cypress Point project which was approved in 1987. The approved Cypress Point project proposed a 100 unit retirement community developed on 39 of the 70 acres. The remainder of the property was proposed to remain as open space and 16 acres were proposed to be dedicated to the City of Santa Barbara. Since the 1987 approval, the applicant has reapplied for approval of 45 single family dwelling units to replace the retirement community concept. The City has called for subsequent environmental review of the revised residential project. The Supplemental EIR for the revised project has been released and the review period is over. The Cypress Point Supplemental EIR is scheduled for certification on May 14, 1993.

Development of a hotel on the Wilcox property would likely result in several significant environmental impacts. According to the 1986 Final EIR for the Cypress Point Retirement Community, development of that project would have resulted in seven Class I, significant, unavoidable impacts. These impacts include short-term and long-term air quality impacts, impacts to biological resources, traffic, noise, aesthetics and water supply. Similar impacts would likely result with any project on the Wilcox site. Most notable, the Wilcox property has high habitat value and any development would result in impacts to biological resources. Arroyo Burro Creek supports riparian communities which provide habitat for a variety of bird species, including hawks, egrets, owls, woodpeckers and quail. Additionally, the eucalyptus trees and cypress trees on the site provide habitat for the Monarch butterfly, which is a protected species. The biological sensitivity of this site is far greater than that of the proposed site.

It should also be noted that the 9 acre site along the bluffs of the Wilcox property would not be an ideal site for location of an active recreational park because a substantial portion of this area is within the 75-year bluff setback. Development within the area is not allowed by the Local Coastal Plan. In order to develop a more active park portion of the site, as envisioned by the proposed project, more land on the Wilcox property would need to be dedicated to park purposes.

In addition to the many environmental impacts that could result with the hotel project at this location, there are also land use conflicts that would occur. The Wilcox property is designated in the City's Land Use Element as low-density residential and zoned Planned Unit Development. A hotel project would therefore be inconsistent with current General Plan and zoning designations. Furthermore, there are several Local Coastal Program policies with which a hotel project might be inconsistent. Specifically, Policy 5.3 which states the following: "New development in or adjacent to an existing neighborhood must be compatible in terms of the scale, size and design of the established neighborhood. New development which would result in an overburdening of the public circulation and/or on street parking resources of the existing neighborhoods shall not be permitted."

It should be noted that there was once a hotel contemplated on this site (in the mid 1970s). The property was rezoned from resort hotel to residential and the property-owners sued the City. The lawsuit went to the U.S. Supreme Court where it was determined that the rezoning of the property did not constitute an inappropriate taking of the property by the City. The court ruled that the rezone was a justified action of the City's police power and that the site was inappropriate for development of a hotel land use.

Furthermore, because development of a luxury hotel at this site would result in greater impacts on sensitive environmental resources than those which would occur at the proposed Waterfront site, development of the Wilcox property with luxury hotel uses would not be appropriate. Additionally, due to the existing project proposals being considered for this site and the historic proposals, it is not realistic to consider the Wilcox property as a viable option for the hotel use.

4.1.2. The Montecito Country Club

The Montecito Country Club is comprised of 10 parcels totaling approximately 118 acres. The site is currently developed with a private golf course and swimming pool, tennis courts and ancillary service facilities. It is bordered by U.S. Highway 101 on the south, single and multi-family development to the west and north, and a mixture of commercial and single family residential to the east. It is assumed that the luxury hotel could be located on some of the unused open space near the existing structures.

The site is currently zoned A-2, single family, with a 25,000 square foot minimum lot size. The City's General Plan classifies this site as Major Public and Institutional Use. The site lies in the Coastal Zone and the Local Coastal Plan (LCP) designates the site as Recreation/Open Space. Furthermore, the City's General Plan and the LCP contain a number of references to maintaining this site as recreational open space. Therefore, locating a luxury hotel at this site would result in land use inconsistencies and would require an LCP amendment, zone change and General Plan amendment.

In addition to the above-mentioned land use inconsistencies that may result from locating a luxury hotel at the Montecito Country Club site, there are also several potential environmental constraints associated with development of a hotel at this location. Development at this site could result in seismic/geologic impacts, traffic and air quality impacts, noise impacts and visual impacts.

Regarding geology, flooding and seismicity, development of a luxury hotel at the Montecito County Club could result in significant impacts.[98] The Lagoon fault which is considered potentially active, transverses the northerly portion of the site. A geologic investigation would need to be prepared and appropriate mitigation measures prescribed to reduce impacts. Additionally, the southwesterly portion of the site lies in the 100- year flood plain and the majority of the site contains erosive and expansive soils. In that portions of the Montecito Country Club site have slopes which exceed 30%, grading to create building pads would need to be carefully monitored. These potential impacts would need to be addressed if development of this site were seriously contemplated.

Development of a 150 room luxury hotel in the primarily quiet residential area near the Montecito Country Club would likely result in significant, unavoidable traffic and circulation impacts. The existing traffic conditions in the vicinity of the Montecito Country Club are becoming increasingly constrained.[99] While vicinity roadways are generally characterized as free flowing residential collector streets, nearby intersections are currently operating at unacceptable levels of service. The most congested intersections in Montecito are the Coast Village Road/Hot Springs Road/Old Coast Highway and Old Coast Highway/Salinas Street intersections which exceed the carrying capacity during morning and evening peak periods. Addition of project related traffic to these intersections and to the quiet residential streets would likely result in significant impacts.

[98] City of Santa Barbara Seismic Safety and Safety Element of the General Plan, November, 1978.

[99] Personal communication, City of Santa Barbara Public Works Department, Rob Dayton

Any development at the Montecito Country Club that would necessitate excessive grading could result in significant and unavoidable short-term air quality impacts. In that portions of the Country Club site have slopes which exceed 30%, it is assumed that substantial grading would need to occur to provide the building pads for the hotel. Because of the steep slopes on the Montecito Country Club site, grading for this site would likely result in greater impacts than at the proposed site, which is flat.

In terms of Noise exposure, the City's Noise Element indicates that the southerly portion of the site is subject to noise levels ranging from 60 dBA to 75 dBA. These high noise levels are a result of this site's close proximity to both U.S. Highway 101 and the Southern Pacific Railroad line. The proposed site along the Waterfront is also located directly adjacent to the south of the Southern Pacific Railroad tracks, therefore the noise impacts would likely be greater at the proposed site than at the Country Club site. However, there are mitigation measures available which would reduce noise impacts to less than significant levels.

Regarding aesthetic impacts, placement of a hotel at the Montecito Country Club could result in significant impacts. The Montecito Country Club property represents considerable aesthetic value as recreational open space. When driving north or south along U.S. Highway 101, on Old Coast Highway, at various points in Montecito and particularly when driving southbound on Cabrillo Boulevard at the Andrea Clark Bird Refuge area, the Montecito Country Club is a prominent feature. Any significant modification of the open space character of this view could be considered significant. The high visibility of the Montecito Country Club would necessitate extra sensitivity with regard to building design and placement of buildings. This location would also suffer from short-term aesthetics impacts related to the loss of mature skyline trees and shrubs.

By contrast, placement of the hotel at the proposed site would result in some beneficial visual impacts. As described in the Aesthetics Section of this EIR, placement of the hotel at the proposed Waterfront location would act as a buffer between the adjacent industrial area and the scenic Waterfront Area along Cabrillo Boulevard. The hotel and proposed open space park use would provide pleasing views in comparison with the existing views of the industrial area and the run-down conditions of the site. Placement of the hotel at the Waterfront site could result in less visual impacts than placement of the hotel at the Montecito Country Club.

In summary, development of the project at the Montecito Country Club location would not serve to reduce impacts to less than significant levels. Long-term air quality impacts for a 150-room hotel would remain significant and unavoidable at this location. Furthermore, as indicated above, environmental impacts could be increased by placement of the hotel at the Montecito Country Club in comparison to the proposed site. It should also be noted that the availability of the Montecito Country Club for the hotel use is dependent upon the willingness of the landowner to sell or lease the land, as well as the applicants' ability to purchase or lease the land.

4.1.3. The Jesuit Property (Rancho Las Positas)

The property known as the Jesuit property is located northeast of the intersection of Los Positas Road and Cliff Drive, adjacent to Los Positas Park. The Jesuit property lies within the sphere of influence of the City but is not within City boundaries. However, if developed, it would likely be annexed into the City. The currently vacant property comprises approximately 110 acres and is owned by the Society of Jesus of the Roman Catholic Church. The site is surrounded by residential and recreational/open space land uses and is

zoned residential. Development of a luxury hotel at this location could be regarded as potentially in conflict with existing land uses and would necessitate a zone change.

There have been a variety of residential projects proposed on this site, the most recent of which included a proposal for 112 single-family units. This project did not go forward due to the environmental constraints which exist on the site. According to the 1980 Environmental Impact Report Supplement on the Rancho Las Positas Project, the site is prone to landslides and has slopes which exceed 30%. Grading and site preparation would therefore likely result in significant impacts. Other potentially significant impacts which may occur with development on the Jesuit property include biological constraints, geological/seismic impacts, visuals, erosion, public service constraints and traffic and access impacts. Long-term and short-term air quality impacts would be unavoidable and significant at either the Jesuit property or the proposed project site.

A major concern with development on the Jesuit property would be impacts to the sensitive biological resources which exist on this site.[100] Briefly, the site provides good wildlife habitat and supports coastal sage scrub, grassland, oak woodland and riparian plant communities. Furthermore, the Jesuit property is known to be a habitat for the Black Shouldered Kite, a species which is listed on the California Department of Fish and Game species of concern list and on the County of Santa Barbara list of sensitive species; a variety of other raptors have also been observed.

In addition to significant biological impacts that could occur with development of this site, visual impacts could also occur. This property represents considerable aesthetic value as recreational open space and is adjacent to the Las Positas Park. Driving in either direction along Las Positas Road and Cliff Drive provides scenic views of the Jesuit property. Any substantial modification of the open space character of this site could be considered significant.

In summary, development of a luxury hotel on this site would not reduce project impacts to less than significant levels and could actually result in increased environmental impacts beyond those which would occur at the proposed Waterfront site. There could also be land use incompatibilities resultant from building a hotel at this location. It should also be noted that the availability of the Jesuit property for the hotel use is dependent upon the willingness of the landowner to sell or lease the land, as well as the applicants' ability to purchase or lease the land.

4.1.4 The Southern Pacific Property

This alternative location is situated in the industrial portion of the Waterfront Area. Specifically, the Southern Pacific Transportation Company owned parcels are located north of the railroad tracks and south of U.S. Highway 101, along Salsipuedes Street. This area comprises approximately 23 acres and is zoned Ocean Related Manufacturing, which according to the City Local Coastal Plan, is a priority in this area of the Coastal Zone. Development of a hotel at this location would not serve to reduce environmental impacts of the proposed site. In fact, development at this site in close proximity to industrial uses would significantly increase environmental impacts in the areas of visuals, noise, hazardous materials, traffic and access, land use and risk of upset. Development of a luxury hotel at this location would be highly inappropriate given the current land use designations and the surrounding land uses which are industrial and light manufacturing in nature. Due to the fact that this site is neither realistic nor appropriate for hotel

[100] Supplemental Environmental Impact Report on the Rancho Los Positas Project, 1980.

development, no further consideration will be given to this alternative site.

4.2 Park Alternative Sites

4.2.1 Wilcox Property

The Wilcox property could easily accommodate the Park component of the project. In connection with a Final Map for a senior retirement project, the property owner has offered to dedicate to the City 16 acres of the property for the purposes of open space and park uses. Locating a passive, natural park on this location would result in minimal environmental impacts. However, a more active park such as the proposed park portion of the site may result in some impacts on this site. While the property is large enough to allow for access and parking and could be designed to blend with the existing natural environment, a planned park would alter the currently natural open space character of the site which may be considered significant. The LCP calls for this area to be used for passive park purposes. The activities included with the proposed project would be inconsistent with this designation. There is also a question of the need for an active park in this location. Las Positas Park is located within one quarter of a mile of the Wilcox Property. Additionally, in that there are no tourist accommodations in the vicinity of the Wilcox property, locating a park in this area would predominantly serve residents, which would be considered by many to be a benefit. However, according to the City's Parks Needs Assessment, the City's east side is more needy of a park than the Mesa area. The extension of Salsipuedes at the proposed site would create an easier access to the park portion of the site for east side residents, thereby satisfying a current recreational need for the City.

From a land use consistency standpoint, the future plans for the Wilcox property are currently unclear. The site could be developed with either senior housing or single-family housing. It is not known whether a park of the magnitude proposed would be compatible with the future development on the site. Development of a park portion of the site to the size and scale of the proposed Waterfront Park at the Wilcox property would draw both residents and tourists to the area. In that the development of the site will likely be either senior housing or single-family housing, these adjacent uses may not be considered compatible. From an environmental standpoint, a passive park component could likely be located at the Wilcox property without resulting in significant impacts. However, an active park, as proposed by the project, would result in traffic and parking impacts and would not be appropriate at this site.

4.2.2 Jesuit Property

As described previously, any type of development on the Jesuit property would result in significant environmental impacts. The main environmental concerns with development at this site include impacts to biological resources, visual impacts, traffic and access constraints and geological/seismic impacts. In addition to the environmental issues that would result from any development on this site (even a park use), the question of the need and appropriateness of an additional active park directly adjacent to Las Positas Park is an issue. Additionally, the availability of this site and the applicants' willingness to purchase this site are factors that must also be considered. However, given the size of this site, if a park portion of the site were designed within the parameters of the many constraints which exist on this site, a park use could likely be accommodated on the Jesuit property.

4.3 Hostel Alternative Sites

It should be noted that regardless of the hostel components' location, the hostel would have no direct relationship to the economic viability of the proposed project, save its relationship to the size of the commercial site. The satisfaction of the hostel requirement allows the Parker Family Trust to commercially develop up to 3.4 acres of overall site; the balance to be directed to public open space. Furthermore, the youth hostel project component would be consistent with City Charter Section 1508 (Measure E) as implementation of the hostel, at either of the alternative sites mentioned below, would not result in significant impacts on water resources, traffic, or affordable housing demands. The youth hostel component was part of the conditions of approval of the Specific Plan for parcels "B" and "C".

4.3.1 Alternative Hostel Site on State Street

The State Street hostel alternative site is owned by the Southern Pacific Railroad Company and located directly adjacent to and southeast of the railroad tracks, fronting along State Street. The site is legally known as Assessor Parcel Number 33-010-03. The State Street Hotel is located directly adjacent to the east of this site and a GMC car dealership is located directly northeast of this site, across State Street. This parcel is rectangular in shape, is approximately 2 acres in size and is currently vacant, with the exception of a Southern Pacific equipment building on the western portion of the site.

Development of the hostel at this location would not result in any more or less environmental impacts than if developed at the proposed hostel site. The site is equally void of biological resources, is flat, and development of the hostel here would not result in geological or grading impacts. Archaeological significance is not known and would need to be investigated in that the area is known to be culturally and historically sensitive. Noise and risk of upset impacts may be slightly increased at this site in comparison to the proposed site due to the even closer proximity to the railroad tracks. The major concern with placing the hostel at this location is the potential land use inconsistencies that may result. The City has planned for the land use at this site to be visitor-serving commercial. Hotel/accommodation uses, although visitor serving, are not as desirable as retail uses along the State Street frontage.

From an environmental standpoint, developing the hostel at this location would not serve to reduce impacts. Furthermore, since not as much environmental constraints data is known about this alternative site, impacts may be increased with the development of the hostel at this location. Given that the development of the youth hostel at the proposed location would not result in any significant environmental impacts and that the selection of the State Street location for the hostel may result in other impacts discussed above, there is no justification for selecting this location over the proposed location.

4.3.2 Alternative Hostel Site on Montecito Street

The Montecito Street alternative hostel site is located on the corner of Montecito Street and Helena Street, south of U.S. Highway 101, east of State Street and directly west of the now closed Cafe 101 coffee shop. The legal Assessor's Parcel Map Number is 33-052-16. This site is currently a graded, flat, vacant parcel, void of vegetation. Surrounding land uses are industrial and commercial in nature. Preliminarily, it would appear that development on this site would not result in significant environmental impacts. However, the proposed site on Chapala and Montecito Streets may be a more desirable location for a hostel, given that the Helena site is more industrial than the proposed site, and may be more appropriate for a visitor-serving retail or commercial land use. Additionally, the availability of this site and the applicants' willingness to purchase this site are factors that must also be considered. In terms of this site's relation to City Ordinance

1508 (Measure E), the site has 22,209 of government square footage assigned to it and would therefore fit within the allowed square footage without being subject to apply for square footage under Measure E. Given that the development of the youth hostel at the proposed location would not result in any significant environmental impacts and the fact that it is unknown whether the Montecito Street site would be available for a hostel use, there is no justification for selecting this location over the proposed location.

5.0 Alternative Park Programming

Concern was expressed by interested citizens during the EIR scoping process that the proposed park portion of the site did not offer enough teen activities. This alternative evaluates replacing the carousel component of the park with a more community and youth-oriented use such as a skateboard park. A miniature golf course was suggested for the park portion of the site but, given the site's limited size, there is not sufficient space to accommodate this use without eliminating most of the other park components. A skateboard park would directly serve teen users (ages 10-16) who have proven to be the most difficult group of potential park users to accommodate. The space required for a skateboard park would be larger than the area designated for the carousel. Thus, development of the skateboard park would decrease the amount of open space currently proposed and would increase the amount of developed space.

The City's Recreational Needs Assessment and the Youth Task Force indicate that more youth facilities are needed throughout the City. However, the proposed park portion of the site is City-owned public land, which presents particular problems for its use as a skateboard park.[101] The City's insurance for a use with such a high accident rate would be very expensive and potentially cost prohibitive. In addition, a high risk use could make the City vulnerable to liability lawsuits. Security measures would have to be substantial enough to prevent skateboarders from using the park portion of the site while it is closed. This would probably necessitate a high fence around the park portion of the site which would visually impair the open space nature of the entire park portion of the site. Research performed by City Parks and Recreation staff indicates that skateboard parks are best when operated by private companies and when located in close proximity to other teen-oriented recreational facilities, such as batting cages and miniature golf.

The Teen Center at the Pump House in the proposed park portion of the site has been dedicated to teen activities. The proposed Teen Center would include video games, a pool table and/or Ping-Pong tables, food concessions and game rentals. Additionally, the large hardscape that is proposed for the area surrounding the Pump House would offer more space for teen activities such as badminton, croquet and volleyball. The planned "Great Meadow" will provide an area for Frisbee, hackey-sack, etc. The teens could also utilize the Pavilion to stage music concerts or evening dances. Schools or clubs could schedule these or other activities as part of the Teen Center.

In summary, it is believed that the proposed park portion of the site will serve all age levels and would provide sufficient activities for teens. While a youth-specific area for a skateboard park is a desirable use, the Waterfront Area would not be the most suitable area for this use.

B. ALTERNATIVES PREVIOUSLY CONSIDERED

The following discussion is presented for informational purposes only; these alternatives are not being

[101] Personal Communication with Joan Russell, Recreation Program Manager with the City Parks and Recreation Department on December 4, 1992.

considered as alternatives to the proposed project. The two project concepts discussed below were part of the Alternatives analysis in the Draft EIR. Based upon valid reasons raised during the circulation of the DEIR, the two project concepts below are no longer considered viable alternatives to the proposed project. However, the discussions below are included for information purposes and to demonstrate the types of development proposals that have been considered and rejected on the proposed project site.

1.0 Uses Allowed Under the Current Specific Plan

Prior to the proposed project, several other projects for the site had been submitted to and reviewed by the City, as is discussed in Section I, Introduction. The original project was presented to the City in 1981 and revised in 1987. The original and revised projects proposed a variety of land uses including retail, office, residential and restaurant. After the 1987 Fiesta Park project was denied, a revised project was submitted for review and an EIR addendum was prepared. The 1987 revised Fiesta Park project is used as the basis for an alternative use allowed under the Specific Plan in this section. The project included the following components:

Retail:	52,800 square feet
Restaurant:	13,000 square feet
Fast-food:	1,500 square feet
Residential:	18,800 square feet
Office:	9,000 square feet
Total:	95,100 square feet proposed on 7.94 acres

Recreational Open Space Proposed: 5 acres

While the 1987 project would have been consistent with the Specific Plan and the Coastal Commission conditions of approval for the site, it would have resulted in significant and unavoidable air quality, traffic and water impacts. As indicated in the August 3, 1988 Addendum EIR for the Fiesta Park Project, SB-110-87, the "revised" project would have resulted in three Class I, significant and unavoidable impacts. The reader is referred to the Addendum EIR, which is on file with the City of Santa Barbara Community Development Department, for specific details on the impact analysis that was performed. However, this alternative would probably not result in a Class I, significant, unavoidable impact to water resources today because the City has revised the water threshold for significant impacts. As is discussed in the Impacts Not Found Significant section, the water demand for this alternative would be well below the standard for significance. Therefore, this alternative would probably result in significant impacts to traffic and air quality alone.

In addition to having two Class I, unavoidable impacts, the Planning Commission and staff determined that the revised project was excessively dense and included too much land use intensity for this site. Furthermore, this project did not provide enough open space and was deemed inappropriate for the site. It should also be noted that the 1987 Fiesta park project was proposed at a time when the building height definition allowed roof lines to exceed 45 feet in the height above grade. In some areas, the allowed elevation above existing grade exceeded 51 feet, resulting in blockage of more viewshed than the presently proposed project which will not exceed 45 feet in height above grade.

In that the above project concept has already been rejected, it is not being considered as an alternative to the proposed project. The currently proposed project is less dense and would result in fewer environmental impacts than the above project, therefore, this alternative would not serve to reduce environmental impacts

of the proposed project.

2.0 Alternative Use - Plazuela Concept

Over the past year, the East Beach Planning Committee (EBPC) has held meetings with Eastside residents in an attempt to develop ideas on the best possible uses for the subject property to benefit the entire community, with special emphasis on the needs of the Eastside residents. The meetings were successful in identifying that the Eastside neighborhoods are currently lacking in certain services. The Eastside residents indicated that they would like to see additional commercial and retail uses on this site to serve the community. Additionally, affordable housing, restaurants and recreational uses were discussed as needs for the Eastside residents.

In response to these meetings, the EBPC has identified a project concept for this site which they have coined the "plazuela", a blend of mixed use development resembling a Latin market place or "mercado". Uses of this nature were originally contemplated for the Waterfront Area east of State Street in the planning study entitled Choices for the Future, prepared by Patterson, Langford and Stewart in 1974 for the City's Redevelopment Agency. The EBPC believes that the community would benefit by the combination of mixed uses and recreational youth oriented projects on this site. Based upon a discussion of the Plazuela concept with an EBPC representative,[102] the Plazuela apparently envisions mixed uses with several shops and restaurants serving both tourists and the local community. There would be a special emphasis on Latin culture and heritage coinciding with the uses on the site. The theme of this concept partially stems from language contained in the City General Plan's Land Use Element which calls for a "Mercado" east of lower State Street in the Waterfront Area.

Given that there are currently no formal plans for the Plazuela Project, hypothetical numbers have been assigned to this concept to ascertain the potential economic impacts that might be associated with the Plazuela alternative. For the purposes of environmental analysis, the same numbers have been utilized. Hypothetically, the Plazuela could include 5,000 square feet of restaurant use; 50,000 square feet of community shopping center/retail; 5,000 square feet of office space; and 24 apartments. Open space and recreational uses would also be included in the plan. Given these numbers, the total number of average daily traffic trips that could result from this combination of uses would equal approximately 2,462.[103]

The long-term air quality emissions rates that would result from the combination of these uses would total approximately 2.07 lbs/peak hour of ROC and 3.27 lbs/peak hour of NOx (URBEMIS3 Program). ROC emissions levels would not exceed the Santa Barbara County Air Pollution Control District's 2.5 lb/peak hour threshold, but NOx emissions would exceed the threshold and therefore would result in an unavoidable significant impact. Overall, the Plazuela Project would result in a greater number of traffic trips than the proposed project, with significant air quality impacts equivalent to the proposed project. Without further detail on the design and layout of this concept, it is difficult to quantify other impacts. However, it is assumed that biology, archaeology, noise, recreation and public services would remain similar with either the proposed Waterfront Project or the Plazuela Project.

A major flaw associated with the Plazuela Project is that the amount of mixed uses being contemplated by

[102] Personal communication, Dave Tabor & Associates, January, 1993.

[103] Institute of Transportation Engineers Trip Generation Manual, 5th Edition.

the EBPC is too dense for the site and is inconsistent with several General Plan, Specific Plan and Local Coastal Plan policies which govern the Waterfront Area. It should be noted that the Plazuela concept would not be unlike previously denied proposals in that retail and restaurant activities would have to be linear in nature fronting Cabrillo Boulevard. These uses would be in conflict with the wishes of the community as seen in the previous denials for similar proposals on this site. According to the Specific Plan for this site, land uses on this property are designated as visitor-serving and recreational open space. Lastly, the Plazuela concept would not meet the objectives of the project and would not serve to reduce environmental impacts, and is therefore not considered an alternative to the proposed project.

C. SUMMARY OF ALTERNATIVES AND ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In terms of reducing environmental impacts, the "No Project" alternative would result in no new impacts to the area. It must be noted, however, that in this case, selection of the No Project alternative would also not provide the beneficial impacts which the proposed project would provide. The provision of a youth hostel, ten acres of a planned park and the aesthetic improvements of this project are significant community benefits. Additionally, the California Environmental Quality Act requires that an Environmentally Superior Alternative be identified, other than the "No Project" alternative. The No Project alternative is, therefore, not considered to be the environmentally superior alternative.

Based on the above analysis, the Alternative Design Consistent with the Specific Plan project would result in the least amount of impacts and would, therefore, be considered the **environmentally superior alternative**. As shown in the matrix, Table XI-2, the proposed project and alternatives have been ranked for issue impacts from least adverse (0) to most adverse (4). This ranking criteria was based on the preliminary analysis contained in this section. The discussion of alternatives previously considered and the hostel and park component alternative sites were not included in this matrix.

Table XI-2
Alternatives Matrix

Alternatives / Impacts	Proposed Project	No Project	Alternative Design	Alternative SP Design 2**	Wilcox Site	Montecito Club Site	Jesuit Site	Southern Pacific Site
Long-term Air Quality	4*	0	4	2	4	4	4	4
Short-term Air Quality	3	0	3	3	3	4	3	3
Biology	1	0	1	1	4	2	4	0
Archaeology	0	0	0	0	0	2	2	0
Noise	4	0	4	4	4	3	4	4
Traffic	2	0	1	1	4	4	4	4
Risk of Upset	2	0	2	2	0	0	0	4
Hazardous Materials	0	0	0	0	0	0	0	3
Aesthetics	2	0	1	1	4	4	4	4
Recreation	0	0	0	0	0	0	0	0
Total	**16**	**0**	**14**	**12**	**23**	**23**	**25**	**26**

* Impacts have been assigned a 0-4 ranking, 4 points indicating the most significant impacts and 0 indicating the least significant impacts.

** The Alternative Design Consistent with the Specific Plan is the Environmentally Superior Alternative.

XII. MITIGATION MONITORING FRAMEWORK

By law (Assembly Bill 3180), agencies must adopt a mitigation monitoring program at the time of project approval for any project which necessitated the preparation of either a Negative Declaration or an Environmental Impact Report after January 1, 1989. Such a monitoring program must ensure that every mitigation measure required to reduce a significant impact of the project (as identified in the EIR and as adopted as a condition of approval) is implemented, and that the effectiveness of each mitigation is documented and reported to the CEQA Lead Agency. A report must be prepared for the City which documents the completion of the required mitigation measures, assesses the effectiveness of the mitigation and, if appropriate, identifies recommendations or techniques to improve mitigation for incorporation in future projects.

The Monitoring Program which will be eventually engineered for the project must be reviewed and approved by the City prior to approval of the project. Analogous to the City's guidelines for the preparation of Environmental Impact Reports, the Monitoring Program should be devised and completed by an independent third-party consultant in order to ensure objectivity and provide the appropriate level of expertise. The Applicants are responsible for insuring that their construction contractors are educated about the requirements of the Monitoring Program and for implementing it.

The intent of AB 3180 is to guarantee that mitigation and conditions, which have been required as part of a project's approval, are actually implemented. In this manner, it would be ensured that findings which had been made during the approval process, are in fact legitimized. A draft mitigation monitoring framework is provided in the following table.

Section #	Condition Description	Compliance Timing	Compliance Method	Frequency	Sign Off
VI-A-1	A truck routing plan for construction truck travel during project development shall be submitted. Neither the Cabrillo Boulevard/101 nor the Milpas/101 interchanges shall be used for truck traffic.	Prior to issuance of Grading Permits.	The truck routing plan shall be reviewed and approved by the City Transportation Division.	Once.	
VI-A-2	During construction of the proposed project, queuing trucks shall queue on-site and a brief traffic lane shall be designated along Cabrillo. Additionally, a traffic control person shall assist in directing traffic when trucks are entering Cabrillo.	During construction.	The City's mitigation monitor designee shall make periodic site visits to ensure compliance.	Ongoing during all construction activities.	
VI-A-3	A parking plan addressing the parking needs of construction crews shall be submitted.	Prior to issuance of Grading Permits.	The parking plan shall be reviewed and approved by the City Transportation Division.	Once.	
VI-A-4	The park's proposed mid-block driveway on Cabrillo Blvd. shall be designed to restrict access to right turns in/out.	Prior to issuance of Building Permits.	The development plan shall be reviewed and approved by City Transportation Division.	Once.	
VI-A-5	The existing median within Salsipuedes Street (portion adjacent to hotel site) shall be shortened and a left-turn lane to store vehicles entering the hotel shall be provided.	Final Site/Development Plan shall indicate this measure.	The City Transportation Division shall review and approve to ensure compliance by the Applicant.	Once.	
VI-A-6	An agreement which guarantees up to 100 spaces of parking at the Red Lion shall be made or off-site parking shall be developed.	Prior to issuance of Certificate of Occupancy.	The City Transportation Division shall review and approve to ensure compliance.	Once.	
VI-A-7	The Salsipuedes Street extension shall be constructed.	Prior to issuance of Certificate of Occupancy.	Plans for street extension shall be reviewed and approved by City Transportation Division.	Once.	

Section #	Condition Description	Compliance Timing	Compliance Method	Frequency	Sign Off
VI-A-8	A traffic signal shall be installed at the Cabrillo/101 Southbound On/Off-ramps and Northbound Off-ramp intersection.	Prior to issuance of Certificate of Occupancy.	The City Transportation Division shall ensure compliance.	As needed.	
VI-A-9	The applicant shall have a Traffic Demand Management Program prepared.	Prior to issuance of Certificate of Occupancy.	The City Transportation Division shall review and approve the plan ensure compliance.	Once.	
VI-B-1	The following measures are for NOx emissions reduction during construction: - equipment engines shall be maintained in good working condition/proper tune per manufacturer's specs. - during smog season (May - Oct.), the daily construction period shall be lengthened to minimize the amount of equipment operating at one time. - Construction activities shall utilize all new technologies to control ozone precursor emissions. - gasoline-powered equipment shall be substituted for diesel-powered where available.	During construction of the proposed project.	Division of Land Use Controls to visit site to ensure compliance.	Ongoing during construction.	
VI-B-2	Fugitive dust generated by development activities shall be retained on-site and kept to a minimum by the following measures: - during clearing, grading, earth moving or excavation, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease. - after clearing, grading, earth moving or excavation is completed, the disturbed area must be treated by watering or revegetating or by spreading soil binders. - during construction, water trucks or sprinkler systems shall be utilized (frequency of watering shall be increased when wind speeds exceed 15 mph).	During construction of proposed project.	The City's mitigation monitor designee shall make periodic site visits to ensure compliance.	Ongoing during grading and construction activities.	

Section #	Condition Description	Compliance Timing	Compliance Method	Frequency	Sign Off
VI-B-3	Importation, exportation and stockpiling of fill material shall adhere to the following measures: - soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders.	During construction and grading activities.	The City's mitigation monitor designee shall make periodic site visits to ensure compliance.	Ongoing during grading and grading activities.	
VI-B- 4	Activation of increased dust control measures: - the contractor shall designate a person(s) to monitor dust control program and to order increased watering, as necessary.	During construction and grading activities.	The City's mitigation monitor designee shall make periodic site visits to ensure compliance.	Ongoing during construction and grading activities.	
VI-B-5	The applicant shall include, as a note on a separate informational sheet to be recorded with map, the above dust control requirements. All requirements shall be indicated on grading and building plans.	Prior to issuance of Grading Permits.	The City Community Development Department shall review plans and approve to ensure compliance.	Once.	
VI-B-6	The applicant shall prepare a Transportation System Management Program.	Prior to issuance of Grading Permits.	The City Transportation Division shall review and approve to program. Community Development Dept. will ensure compliance by review of periodic reports.	Ongoing.	
VI-B-7	The City, in cooperation with the applicant, shall disseminate educational information on avoiding trips and use of all alternative modes of transportation, as well as a carpool matching and promotion program.	Prior to issuance of Certificate of Occupancy.	City staff to continue their education efforts on modes of alternative transportation. The program should be prepared and approved by the City Transportation Dept.	Ongoing.	
VI-B-8	Include design features to reduce stationary source emissions.	Prior to issuance of Grading Permits.	The City Community Development Department shall review and approve to ensure compliance. The APCD should review the design features to reduce stationary sources.	Once.	

Section #	Condition Description	Compliance Timing	Compliance Method	Frequency	Sign Off
VI-B-9	Applicant shall work with the City to develop appropriate air offsets.	Prior to Certificate of Occupancy.	The City Community Development Department shall coordinate the offset program and enforce it.	As needed.	
VI-E-1	An acoustic barrier with a minimum height of 8 feet relative to the railroad tracks and a minimum height of 7 feet relative to the park shall be erected to reduce train noise to DNL 65 or lower.	Prior to issuance of Building Permits.	The City's Division of Land Use Controls to review and approve construction plans to ensure compliance.	Once.	
VI-E-2	Closed, well sealed, acoustically-upgraded window assemblies shall be installed in the hotel to reduce train noise to DNL 45 or lower.	Prior to issuance of Building Permits.	The City's Division of Land Use Controls to review and approve construction plans to ensure compliance.	Once.	
VI-E-3	Closed, well sealed, acoustically-upgraded window assemblies shall be installed in the hotel to reduce vehicle traffic noise associated with Cabrillo to DNL 45 or lower.	Prior to issuance of Building Permits.	The City's Division of Land Use Controls to review and approve construction plans to ensure compliance.	Once.	
VI-E-4	To reduce train noise to DNL 45 for hostel guest rooms, closed, well sealed, acoustically-upgraded windows shall be used. Acoustically-upgraded windows would not be necessary for southerly face of building.	Prior to issuance of Building Permits.	The City's Division of Land Use Controls to review and approve construction plans to ensure compliance.	Once.	
VI-E-5	Acoustically-upgraded, exterior wall constructions and closed, well sealed, acoustically-rated window assemblies having an STC rating of 32-34 shall be installed to reduce traffic noise within the hostel to DNL 45 or lower.	Prior to issuance of Building Permits.	The City's Division of Land Use Controls to review and approve construction plans to ensure compliance.	Once.	
VI-E-6	The design, selection and placement of equipment for the hotel shall be completed to avoid impacting the easterly portion of the park and hotel guests.	Prior to issuance of Building Permits.	The City's Division of Land Use Controls to review and approve plans to ensure compliance.	Once.	

Section #	Condition Description	Compliance Timing	Compliance Method	Frequency	Sign Off
VI-E-7	To avoid short-term significant noise impacts from pile insertion, feasible alternative construction methods for replacing pile insertion shall be utilized.	Prior to issuance of Building Permits.	The City's Division of Land Use Controls shall review alternative construction methods.	Once.	
VI-E-8	A test pile shall be run prior to construction to verify vibration propagation and building responses. Any recommendations made as a result of the test pile shall be incorporated in the construction process.	Prior to issuance of Grading Permits.	The City's Division of Land Use Controls to review and approve recommendations for pile driving.	Once.	
VI-E-9	All construction equipment shall be provided with well-maintained, functional mufflers. Construction activity shall be restricted to 8 AM - 5 PM, Monday - Friday.	During construction.	The City's mitigation monitor designee shall make periodic site visits to ensure compliance.	Ongoing.	
VI-F-1	To alleviate the short-term impact associated with the removal of on-site vegetation the park's proposed landscaping shall be planted.	Prior to issuance of Certificate of Occupancy.	The City's mitigation monitor designee shall visit site to ensure compliance.	Once.	
VI-F-2	Skyline trees associated with the proposed landscape plan shall not be planted within the existing views of the Riviera and mountains or windrowed.	Prior to approval of the Final Landscape Plan.	The City's mitigation monitor designee shall review the Final Landscape Plan to ensure compliance.	Once.	
VI-G-1	The Landscape Plan shall include the cliff aster species in the landscape plan for the area along the northern perimeter of the park site within areas containing Monterey shale.	Prior to approval of the Final Landscape Plan.	The City's mitigation monitor designee shall review the Final Landscape Plan to ensure compliance.	Once.	
VI-H-1	An emergency response plan shall be formulated for both the park/hotel site and the hostel site to address evacuation in the event of a train derailment or release of hazardous materials.	Prior to issuance of Certificate of Occupancy.	The City's Fire and Police Departments shall review and approve the plan.	Once.	
VI-H-2	Safety procedures and evacuation routes shall be posted throughout the development (park, hotel and hostel), and a safety coordinator shall be designated. Safety coordinator(s) shall know the location and function of all emergency systems.	Prior to Certificate of Occupancy.	The City Fire and/or Police Departments shall make a site visit to ensure compliance.	Once.	

Section #	Condition Description	Compliance Timing	Compliance Method	Frequency	Sign Off
VI-H-3	The development shall be constructed with fire retardant materials and shall have smoke detectors uniformly installed throughout the hotel and hostel areas.	Prior to issuance of Building Permits.	Submit information on materials to be used to Division of Land Use Controls and City Fire Dept. for review and approval. DLUC and Fire Department shall make a site visit to verify compliance after construction is over.	Once.	
VI-H-4	Fire sprinkler systems shall be installed where code and the Fire Chief indicate they are necessary, with special emphasis on the areas of the development which are located immediately adjacent to areas that could be directly impacted by train derailment.	Prior to issuance of Building Permits.	Show sprinkler system on construction plans to be reviewed and approved by the Division of Land Use Controls. DLUC, Fire Department and Environmental Health Services shall make a site visit to verify compliance.	Once.	
VI-H-5	The rear wall of the fire lane area shall be designed and constructed in a manner which provides for the optimum resistance to damage from train car collision and primary structural support for hotel areas should be provided principally in the central and southern portions of the site.	Prior to issuance of Building Permits.	The Division of Land Use Controls shall review and approve design of wall and construction methods.	Once.	
VI-H-6	The proposed project shall comply with all Specific Plan Conditions relative to Risk of Upset.	Prior to Certificate of Occupancy.	The City Community Development Department shall ensure all conditions are adhered to.	Once.	
VI-I-1	For the Parker Family Trust Property: The landowner shall submit a Phase II investigation and work with EHS staff to prepare and implement appropriate remediation plan to reduce contamination to appropriate levels. Remediation shall be completed prior to issuance of grading permits.	Prior to issuance of Grading Permits.	County Environmental Health Services Department shall review and approve remediation plan to ensure compliance.	Once.	

Section #	Condition Description	Compliance Timing	Compliance Method	Frequency	Sign Off
VI-I-2	For the City and SPTC Property: The City shall submit a Phase II investigation and work with EHS staff to prepare and implement appropriate remediation plan to reduce contamination to acceptable levels. Remediation shall be completed prior to issuance of building permits.	Prior to issuance of Grading Permits.	County EHS Department shall review and approve remediation plan to ensure compliance.	Once.	
VI-I-3	For the Salsipuedes Street Extension: The City shall submit a Phase II investigation and work with EHS staff to prepare and implement appropriate remediation plan to reduce contamination to acceptable levels. Remediation shall be completed prior to issuance of building permits.	Prior to issuance of Grading Permits.	County EHS Department shall review and approve remediation plan to ensure compliance.		
VI-I-4	A fire protection sprinkler system shall be installed in the chemical storage areas. The storage areas for pesticides, herbicides, fungicides and/or fertilizers shall be designed with a low berm around the interior floor. The berm shall be designed to provide 100 % containment of any stored liquids and 20 minutes of fire protection sprinkler water flow.	Prior to issuance of Building Permits.	Division of Land Use Controls to approve construction plans which include sprinkler system. County Environmental Health Services Department shall make a site visit to ensure compliance.	Once.	
VI-I-5	The applicant shall develop a Hazardous Materials Management Plan, Hazardous Materials Inventory Statement and a Hazardous Materials Business Plan, as applicable, with actual stored quantities of hazardous materials and regulatory threshold quantities.	Prior to issuance of Grading Permits.	County Environmental Health Services shall review and approve plan.	Once.	

Comment Letter 1

C I T Y O F S A N T A B A R B A R A

INTER-OFFICE MEMORANDUM

DATE: March 26, 1993 **DEPARTMENT OF:** Public Works

TO: Jan Hubbell, Project Planner

FROM: Robert J. Dayton, Senior Transportation Planner

SUBJECT: REVIEW OF WATERFRONT PARK DRAFT ENVIRONMENTAL IMPACT REPORT

Transportation Staff has reviewed the Draft Environmental Impact Report (EIR) for the Waterfront Park Project. Our comments are numbered and identified by page number.

	Page	Comment
1-1	72	Incorporate footnote number 9 into the text.
1-2	80	¶3, Our calculations show that 104 divided by 3.4 equals 31, not 62. Explain methodology.
1-3	86	¶3, last sentence, connect the sentence.
1-4	86	¶4, replace the word "any" with "great".
1-5	87	After ¶4, insert a discussion about traffic thresholds.
1-6	87	Following the above insertion, include a discussion of project-specific impacts. The project will generate project-specific impacts because the v/c ratio is increased by 0.01 or more at impacted intersections.
1-7	89	Figure VIA-4, identify on the figure which intersections are cumulatively impacted.
1-8	92	Table VIA-6, line up the column headings with the columns.
1-9	92	Table VIA-6, add a footnote that indicates that the bold text identifies intersections significantly impacted.
1-10	95	After ¶3, copy the significant impact statement from page 88, ¶7, to this page.
1-11	96	In addition to Figure VIA-8, a figure is needed that shows the change in traffic volumes (+ or -) with the addition of the Garden and Salsipuedes extensions.
1-12	98	Table VIA-7, add a footnote that indicates that the bold text identifies intersections significantly impacted.

	Page	Comment
1-13	98	Table VIA-7, unbold the Milpas/Carpinteria v/c ratio because it is better than the existing v/c ratio; therefore, it is not a significant impact.
1-14	98	Table VIA-7, line up column headings with the columns and underline the headings.
1-15	98	Table VIA-7, replace "DELAY" with "V/C" in the fourth column.
1-16	99	¶6, even with the addition of the Garden and Salsipuedes streets extension, the intersection of Cabrillo/101 will have a significant cumulative impact. State impact in the text.
1-17	100	A summary table for Sunday is needed similar to Table VIA-8.
1-18	100	Table VIA-8, the third column heading should be "E + C" (existing + cumulative).
1-19	100	Table VIA-8, bold the intersection of Cabrillo/101 for the E+C+P w/S scenario.
1-20	100	Table VIA-8, unbold the Milpas/Carpinteria v/c ratio because it is better than the existing v/c ratio; therefore, it is not a significant impact.
1-21	101	¶3, with the addition of the Salsipuedes Street extension, the intersection of Cabrillo/101 will still have a significant cumulative impact. State impact in the text.
1-22	104	Table VIA-9, line up the columns with the column headings.
1-23	104	Table VIA-9, unbold the Milpas/Carpinteria v/c ratio because it is better than the existing v/c ratio; therefore, it is not a significant impact.
1-24	107	¶1, there is no on-street parking on the north side of Cabrillo Boulevard between Salsipuedes and Santa Barbara Streets. This mitigation measure will need to be revised.
1-25	108	¶1, include a discussion of the anticipated levels of service with the Salsipuedes extension.
1-26	110	¶2, line 4 should be corrected as follows, "...Milpas Street intersections, and all but the..."

If you have any questions, please call me at extension 5390.

SW/RD/SB
{E:SWH20EIR.MEM}

Response to Comment Letter 1

1-1 Comment acknowledged; please see revised text.

1-2 The vehicle occupancy of 3.4 people per vehicle divided into 104 people results in 31 vehicles. The number of trips generated was determined assuming two one-way trips per vehicle (31 in, 31 out), thus the total of 62 vehicle trips. It is noted that the text does not clearly delineate this point, therefore the text is revised.

1-3 Comment acknowledged; please see revised text.

1-4 Comment acknowledged; please see revised text.

1-5 A discussion of the general traffic thresholds and project-related impact standards is provided in section 1.2 of the DEIR. The identification of significantly impacted intersections with cumulative traffic growth without the project is provided in section 2.5.2 and for cumulative traffic growth with the project in section 2.5.2. The traffic thresholds for establishing "impacted" intersections (as described in section 1.2) are based on policy outlined in the City's 1988 Circulation Element. For traffic impact assessment, LOS "C" (V/C = 0.77) is considered the threshold for measuring project impacts. If a project causes an increase in V/C above 0.77, or if an intersection already exceeds LOS "C" (V/C = 0.77), then project traffic increasing the V/C ratio by 0.01 or more is a significant impact.

1-6 See response to comment 1-5 above.

1-7 Comment acknowledged; please see revised Figures VIA-4 and VIA-5.

1-8 Comment acknowledged; please see revised text.

1-9 Comment acknowledged; please see revised text.

1-10 Comment acknowledged; please see revised text.

1-11 Comment acknowledged; please see Figures XIII-1 and XIII-2 which directly follow Response to Comment Letter 1.

1-12 Comment acknowledged; please see revised text.

1-13 Comment acknowledged; please see revised text.

1-14 Comment acknowledged; please see revised text.

1-15 Comment acknowledged; please see revised text.

1-16 Comment acknowledged; please see revised text.

1-17 Comment acknowledged; please see revised text.

1-18 Comment acknowledged; please see revised text.

1-19 Comment acknowledged; please see revised text.

1-20 Comment acknowledged; please see revised text.

1-21 Comment acknowledged; please see revised text.

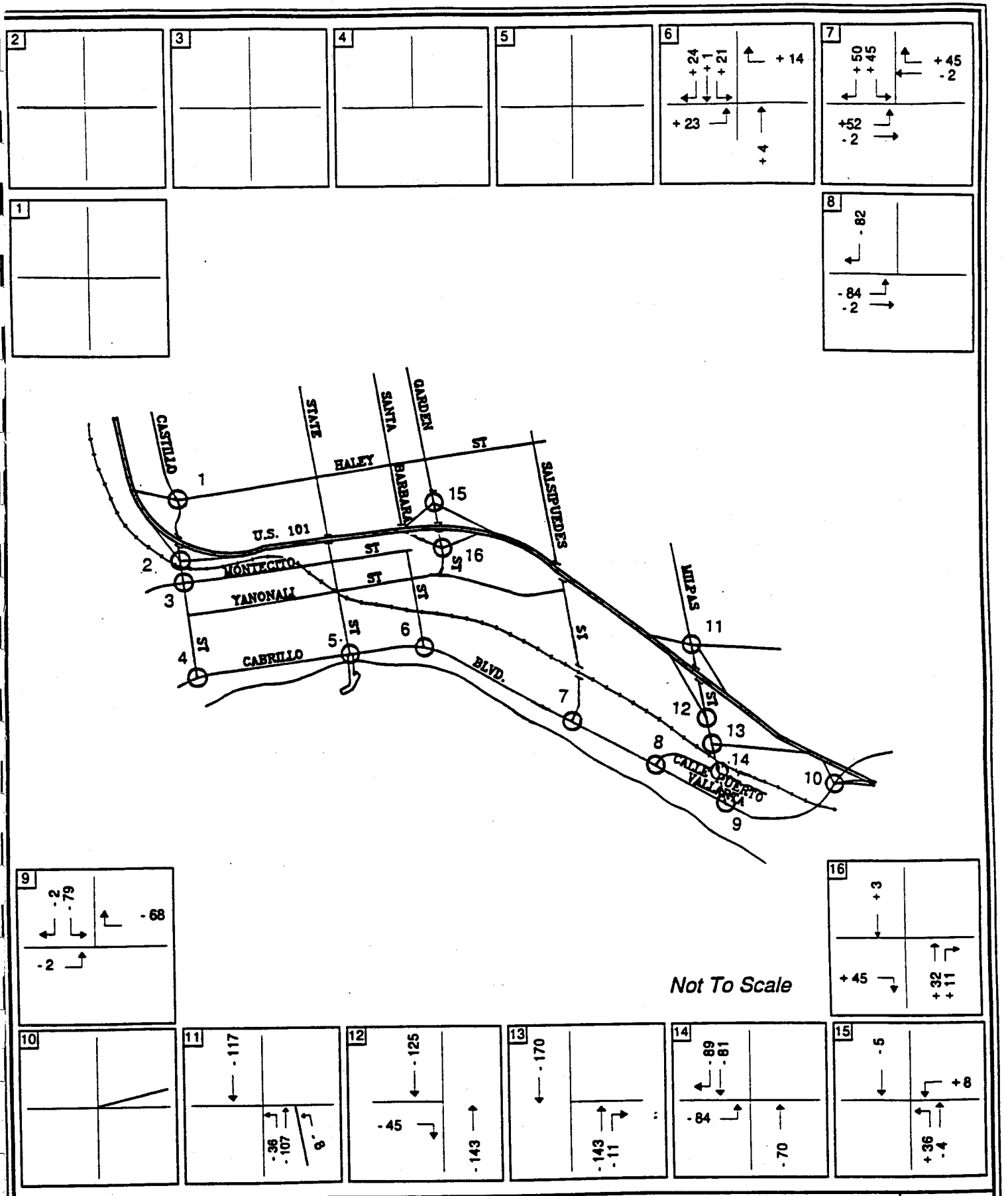
1-22 Comment acknowledged; please see revised text.

1-23 Comment acknowledged; please see revised text.

1-24 Comment acknowledged; please see revised text.

1-25 Comment acknowledged; please see revised text.

1-26 Comment acknowledged; please see revised text.

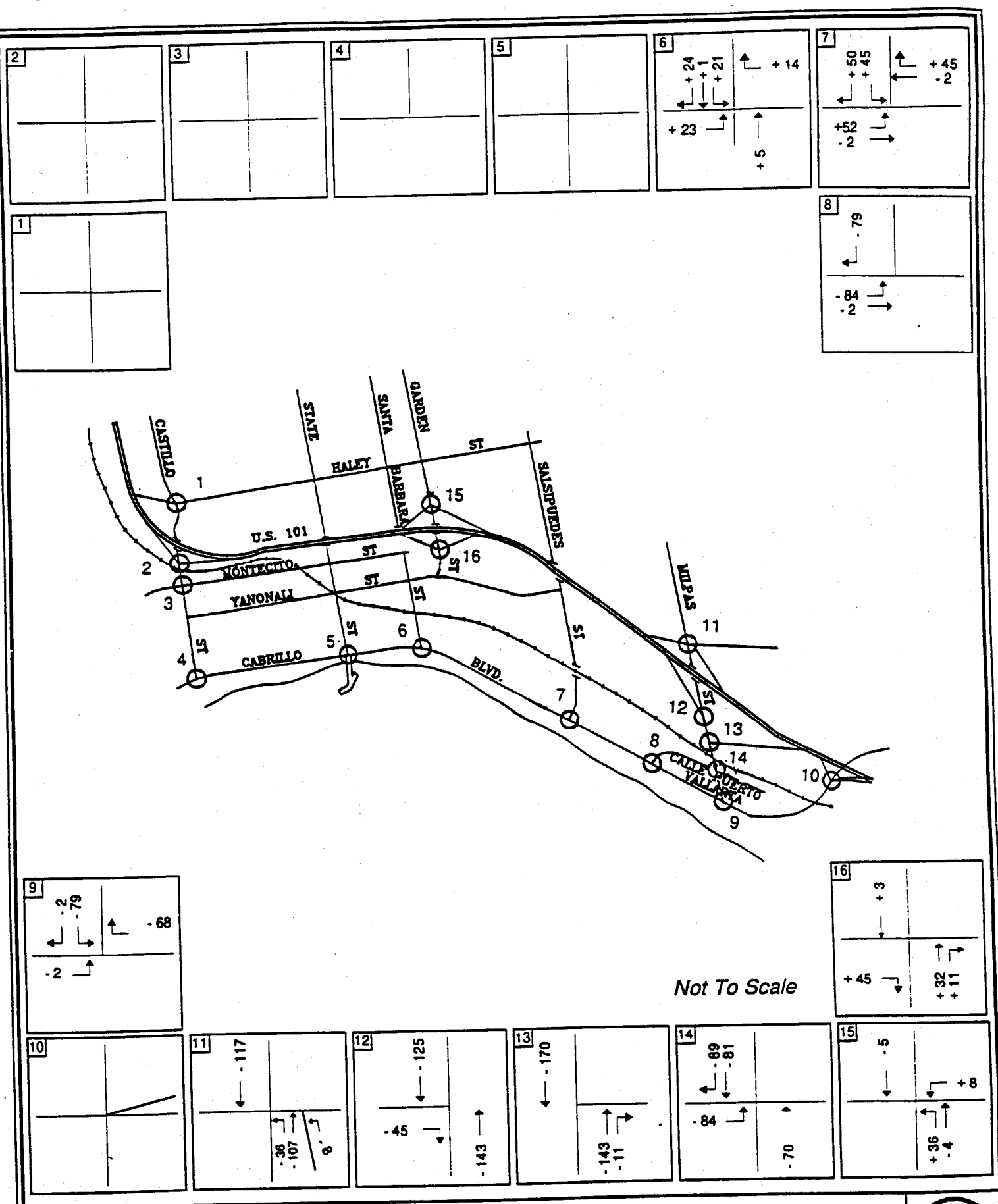


Net Change in Volumes For Existing + Cumulative + Project Scenario
With The Addition Of Salsipuedes Street and Garden Street Extensions
(Friday PM Peak Hour)

omni • means

PC - 5

FIGURE XIII-1



Net Change in Volumes For Existing + Cumulative + Project Scenario
With The Addition Of Salsipuedes Street and Garden Street Extensions
(Sunday PM Peak Hour)

omni• means

PC - 6

FIGURE XIII-2

Santa Barbara County
Air Pollution Control District

Comment Letter 2

RECEIVED

APR 7 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

April 5, 1993

Janice M. Hubbell, Project Planner
City of Santa Barbara
Planning Division,
630 Garden Street,
Santa Barbara, CA 93102

RE: Air Quality Impact Mitigation Program and Comments on the Draft EIR on the Waterfront Park, Hotel and Youth Hostel, March 10, 1993. SCH# 92091038.

Dear Ms. Hubbell,

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to comment on the draft EIR for the above mentioned project. Specific comments on the EIR are attached.

In general, the APCD concurs with the conclusions on the air quality impacts of the project in the EIR and the consequent effects on regional air quality as stated in your March 12, 1993 cover letter. The APCD estimates that the project will exceed the long-term air quality thresholds of significance by approximately one ton/year for ROG and one ton/year for NO_x (see attached comments on the DEIR). The short-term threshold of significance will be exceeded by 4.63 tons/year after application of equipment mitigation measures. As stated in your letter, approving a project such as this one with a statement of overriding considerations will clearly be detrimental to air quality.

The APCD is pleased that the City is interested in pursuing an offsite mitigation program for this project. We are in the process of developing a standardized offsite mitigation program which could be used by smaller developers. In the interim, we would be happy to assist the City in tailoring a program to meet the emission reduction requirements for the Waterfront Hotel, Park and Hostel project. Specifically, the APCD can,

- recommend conditions of approval with specific criteria to ensure that the emission reductions are real, surplus, permanent, enforceable, and quantifiable.

26 Castilian Drive B-23, Goleta, CA 93117 Fax 805-961-8801 Phone 805-961-8800
James M. Ryerson, Air Pollution Control Officer William A. Master, Assistant Director

- provide a flexible menu of offsite mitigation options to reduce the level of impacts to below significance level.
- identify and provide contacts for potential emission reduction providers for this project.
- review the final program and advise City staff as necessary.

Reimbursement for APCD staff time may be required depending on the level of assistance required by the City.

Again, the APCD appreciates the opportunity to comment on the draft EIR and looks forward to working with you on the pilot offsite mitigation program for this project. Please call Vijaya Jammalamadaka at 961-8893 or me at 961-8920 if you have questions regarding these comments or would like to set up a meeting with us regarding the offsite mitigation program.

Sincerely,

Bobbie Bratz
Air Quality Specialist Supervisor
Interagency Review Section

Attachment

cc: Teesee Murray, Interface Planning and Counseling Corporation
Project File (NC: City of SB: Waterfront Park/Hotel/Hostel)
IAR Chron File

ATTACHMENT

SPECIFIC COMMENTS ON THE DRAFT EIR FOR THE WATERFRONT PARK, HOTEL AND YOUTH HOSTEL, March 10, 1993, SCH# 92091038.

2-1 1) Impact Summary Table, Page xii, Air Quality, 4th Mitigation Measure. This measure states that diesel-powered equipment shall replace gasoline-powered equipment wherever possible. This is directly contradictory to the last measure in Section 4.1.1 on Page 124. The APCD recommends deleting both the measures because substitution generally does not result in greater emission reduction than implementing the package of three measures (use of reformulated diesel fuel, two-degree engine timing retard, and installation of high pressure fuel injectors) listed in Section 4.1.1 for all eligible pieces of diesel-powered equipment.

2-2 2) Chapter VI.A, Page 75, Figure VIA-1. This figure shows 784 vehicles travelling westbound on Cabrillo Blvd., just west of Salsipuedes (see node #7, 753+31=784), and 860 vehicles arriving at Santa Barbara St. (see node #6, 59+797+4=860) during the Friday PM peak hour. Since there are no roads or parking lots between these points on Cabrillo Blvd., please provide an explanation for the additional 76 vehicles.

Chapter VI.B

2-3 3) Page 112, 3rd full paragraph. We are not familiar with "shifooting" winds and systems that "shifoot" to the south. These appear to be typographical errors.

2-4 4) Page 118, last paragraph, last sentence. The equipment emissions table in Appendix D (page D-14) assumes that only one dozer and one backhoe would be required for 22 days to construct the hostel building and parking lot. This appears to be an unreasonable assumption that warrants explanation. Also, emissions from transporting or producing concrete onsite should be included.

2-5 5) Page 119, Table VIB-2. The second half of this table uses a 30% reduction for both NO_x and ROG. Implementation of the equipment mitigation package can achieve up to 40% reduction in NO_x and 15% reduction in ROG emissions for each piece of equipment retrofitted. However, it may be assumed that only about 75% of diesel construction equipment can be retrofitted. Thus, emission reduction credits of 30% for NO_x and 11% for ROG can be applied to total project emissions from construction equipment.

2-6 6) Page 120, 1st paragraph, 2nd line. The document states that the equipment mitigation package for NO_x includes three degree engine timing retard. Please correct this to two degrees, as stated correctly on page 124. Also, please correct the next sentence regarding 30% emissions reduction per Comment # 5.

7) Page 121, Table VIB-3. The APCD recommends the following method of estimating residual long-term emissions for this project.

	NO_x	ROC
From the URBEMIS printout,		
Weekday emissions.....	32 lbs/day	33 lbs/day
Weekend emissions.....	47 lbs/day	48 lbs/day
Assuming:		
250 Weekdays/year.....	8000 lbs	8250 lbs
115 Weekend days/year.....	5405 lbs	5520 lbs
Total annual emissions are.....	13405 lbs/year	13770 lbs/year
With a 20% emission credit for TDM Ord.	10724 lbs/year	11016 lbs/year

2-7

Santa Barbara County's long-term threshold for NO_x or ROG is 2.5 lbs/peak hour or (assuming peak hour traffic volume is 10% of average daily trips for this project), 25 lbs/day or the **annual (365 days) threshold is 9125 lbs/year.**

Therefore, residual emissions are.....	1599 lbs/year	1891 lbs/year
or.....	**0.8 ton/year**	**0.9 ton/year**

The APCD recommends that these excess emissions be mitigated through an offsite program and would be happy to assist the City in tailoring such a program for this project.

IAR\WP\IARCORR\SBH2OPRK.EIR

Response to Comment Letter 2

2-1 Comments are acknowledged; the Summary Table and mitigation discussion of the Air Quality Section have been revised according to your comments.

2-2 The volumes at the Cabrillo/Santa Barbara intersection include some traffic leaving the site via Carpinteria Street. Accounting for this added traffic, the volumes approaching Santa Barbara are still about 5% higher than the volumes leaving Salsipuedes, but this would be considered within the tolerance for manual counts.

2-3 Comment acknowledged; please see revised text.

2-4 Comment acknowledged; however, the report preparers disagree that the equipment list and duration of site preparation for the Youth Hostel constitute unreasonable assumptions. The entire site is comprised of 0.55 acres of land, which have been previously developed with commercial uses. Importation of required fill and compaction of such materials could reasonably be accomplished in one week (five working days) using a single dozer. A single backhoe could complete footing excavations within a reasonable time frame of two weeks (10 working days). In our worst case analysis, we have these two pieces of equipment working simultaneously for an entire month (22 working days). The conservative analysis accounts for unanticipated difficulties in site preparation, and provides an emissions budget with a slight surplus to accommodate other limited emissions from such activities as concrete delivery.

2-5 Comment acknowledged; see revised table and text.

2-6 Comment acknowledged; please see revised text.

2-7 Comment acknowledged; thank-you for providing an alternate methodology and threshold to assess long-term impacts. Since the conclusion is the same as for the method employed in the body of the EIR (Class II), the Air Quality Section has not been revised to include this method. However, the comment letter is now an integral part of the EIR.

Comment Letter 3

Santa Barbara County
ASSOCIATION OF
GOVERNMENTS

RECEIVED

APR 14 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

April 7, 1993

Ms. Janice M. Hubbell
Project Planner
Planning Division, City of Santa Barbara
630 Garden Street
Santa Barbara, CA 93012

Re: DEIR - Waterfront Park and Hotel and Youth Hostel

Dear Ms. Hubbell:

Thank you for the opportunity to review the above draft EIR. The traffic, circulation and parking element of this document is well organized and the impact analyses are comprehensive. The followings are a few minor comments:

3-1 1. 1.1 Existing Street Network: The Designated CMP System (including CMP intersections) relative to the project site should be identified so that the CMP impact analysis in section 2.5.6 can be referred.

3-2 2. 1.3 Existing Traffic Flow Conditions: Some discussion of the existing conditions of traffic being held-up at level-crossings on Santa Barbara and Salsipuedes Streets should be provided.

3-3 3. 2.5.6. County of Santa Barbara Congestion Management Plan:
- 4th paragraph: "... 59 peak hour trips or 500 daily trips" should read "... 50 peak hour trips or 500 daily trips."
- A statement indicating "no interjurdictional impacts were identified" should be incorporated in this section.

I have also enclosed a CMP impact analysis guidelines which should be helpful for you and project consultants in addressing CMP system impacts.

Again, thank you for allowing us to review the document. Keep up the good work.

Sincerely,

William F. Yom
Transportation Planner

B:\CORR\WATERFPK.ltr

222 East Anapamu Street, Suite 11 • Santa Barbara, CA 93101 • Phone (805) 568-2546 • Fax (805) 568-2947

Member Agencies: City of Buellton, City of Carpinteria, City of Guadalupe, City of Lompoc, City of Santa Barbara, City of Santa Maria, City of Solvang, County of Santa Barbara

Response to Comment Letter 3

3-1 Comment acknowledged; please see revised text.

3-2 Comment acknowledged; please see revised text.

3-3a Comment acknowledged; please see revised text.

3-3b Comment acknowledged; please see revised text.

Comment Letter 4

Santa Barbara County
ASSOCIATION OF
GOVERNMENTS

April 12, 1993

Subject: Congestion Management Program, Impact Assessment Guidelines for ND's and EIR's

TO WHOM IT MAY CONCERN:

As the Congestion Management Agency (CMA) for Santa Barbara County, SBCAG is required to review and approve the traffic impact analysis of ND's and EIR's for this county. This is to ensure that any proposed development would not create additional traffic impacts to the adopted Congestion Management Program (CMP) System. Should significant impacts be expected, mitigation measures must be taken to avoid deterioration of the system.

Since the adoption of the CMP in January 1992, some EIR's under review have either failed to address such impacts, or have failed to identify the relationship of the location of the project site to the designated CMP System, subsequently leading to omission of this portion of the analysis. 4-1

In order to avoid this problem, the following thresholds of significant impact to the CMP system and guidelines for evaluating impacts for proposed development are provided. These guidelines from the CMP should be followed as part of the traffic impact analysis for ND's and EIR's in this county:

Thresholds of Significant Impact to the CMP System:

1. For any roadway or intersection operating at LOS A or B, a decrease of two levels of service from project added traffic.

2. For any roadway or intersection operating at LOS C, project added traffic that results on LOS D or worse.

3. For intersections on the CMP system with existing congestion, the following table will define significant impacts.

222 East Anapamu Street, Suite 11 • Santa Barbara, CA 93101 • Phone (805) 568-2546 • Fax (805) 568-2947

LOS	Added Peak Trips
D	20
E	10
F	10

For freeway or highway segments with existing congestion, the following table will define significant impacts.

LOS	Added Peak Trips
D	100
E	50
F	50

Guidelines to Evaluating CMP Impacts for ND's and EIRs:

1. Identify the Designated CMP roadway system in relation to the location of the proposed development.

2. Analyze and compare how the proposed development would impact the identified CMP network (roadways and/or intersections). Use the TRC Circular 212 Planning Analysis method for computing intersection volume/capacity and determining intersection LOS.

4-1 cont.

3. Analyze the before and after cumulative impacts to the CMP system.

4. Identify any interjurisdictional impacts to neighboring jurisdictions.

5. Incorporate analysis to include a demonstration that any identified CMP system impacts are mitigated to an acceptable level of service.

6. Assess the need for a mitigation monitoring program to evaluate effectiveness of project conditions.

Transportation Demand Management (TDM) as one of the Mitigation Measures for Proposed Development

The CMP statue also requires local jurisdictions to adopt and implement a Transportation Demand Management (TDM) Program Resolution of Commitment as a mechanism for trip reduction within each local jurisdiction, with additional requirements triggered based on the level of congestion experienced on the CMP network within the jurisdiction. The full TDM program requirements (in a Three-Tier Program) are provided in Chapter V of the CMP.

For proposed development which would have significant impacts

on the CMP system, Chapter V of the CMP and the Three-Tier TDM Program should be reviewed and utilized by consultant as a source for travel demand mitigation measures.

The CMP system impacts should be conducted under a separate heading in the environmental document. If the roadways impacted are identical to the CMP network, they should be mentioned. If no significant impacts resulted because there is no locational relationship between the proposed development and the CMP system, the analysis should simply indicate that there are no significant impacts to the CMP network.

4-1 cont.

The maps indicating the CMP System Designation are found in Chapter II of the CMP. (This includes the newly amended portions of Garden Street in the City of Santa Barbara and the Union Valley parkway in the Santa Maria/Orcutt area.) This information is also available from any local agencies within this county. Copies of the CMP are also available from SBCAG.

If you have any questions, please call Bill Yim or Ann Lawler of my staff.

Sincerely,

Michael Powers

Michael Powers
Deputy Director

B:\CORR\CONSEIR2.ltr

Response to Comment Letter 4

4-1 The Congestion Management Plan was analyzed and discussed in Section V. Land Use Considerations, of the Draft EIR. The reader is referred to Section V and to the response to Comment Letter 3 for further information.

DEPARTMENT OF TRANSPORTATION
P.O. BOX 8114
SAN LUIS OBISPO, CA 93403-8114
TELEPHONE: (805) 549-3111
TDD (805) 549-3259

Comment Letter 5

RECEIVED

APR 15 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

April 13, 1993

5-SB-101-11.41
Water Front Park &
Hotel (Draft EIR)
SCH # 92091038

Ms. Janice M. Hubbell
Planning Division
City of Santa Barbara
P. O. Box 1990
Santa Barbara, CA 93102

Dear Ms. Hubbell:

Caltrans District 5 staff has reviewed the above-referenced document. The following comments were generated as a result of the review:

5-1 a. We have no objection to temporary signals at Cabrillo Street/Route 101 because it will be four years before the six-laning project starts.

5-2 b. The auto entrances in the middle of the complex on Route 225 should be signed, striped and constructed to only allow right turns in and out.

5-3 c. We will not allow any form of designated pedestrian crosswalk in the middle of the complex on Route 225.

5-4 d. The circulation plan in the back of the complex appears to be incomplete. There should be a connection made between Santa Barbara and Salsipuedes streets to allow for better complex circulation and to prevent this traffic from using Route 225 to get from one end of the complex to the other. This will also facilitate access by emergency vehicles.

5-5 e. An encroachment permit must be obtained before any work can be conducted within the Caltrans right-of-way. Please be advised that prior to obtaining an encroachment permit, you are required to have design plans reviewed by this office and an environmental document approved by the lead agency. Biological and archaeological surveys must specifically address impacts

5-5 cont. in the state right-of-way. Should you have further questions regarding encroachment permits, please contact Steve Senet, Permits Engineer, at (805) 549-3152.

Please send us a copy of the Final Environmental Impact Report when it is available (Ref: California Environmental Quality Act of 1970, Section 21092.4). Thank you for the opportunity to comment. If you have any questions, please contact me at (805) 549-3683.

Sincerely,

Wayne M. Schnell

Wayne M. Schnell
District 5
Intergovernmental Review Coordinator

Response to Comment Letter 5

5-1 Comment acknowledged; the FEIR is consistent with the comment.

5-2 Comment acknowledged. The restriction of this driveway to right turn movements is appropriate and the text has been revised..

5-3 Previous EIRs for the project site (Fiesta Park and Park Plaza) indicate that there may be a safety impact if a designated pedestrian crossing is not included as part of a proposed project. A pedestrian crossing was determined to be necessary in order to mitigate potential safety impacts from people illegally crossing Cabrillo because of the long distance between crosswalks. An unsignalized pedestrian crossing was therefore proposed as part of the current project. If the proposed crossing is eliminated, potentially significant safety impacts could occur. The City of Santa Barbara has previously negotiated the provision of other safety-oriented improvements on Cabrillo Boulevard although CalTrans initially objected (Salsipuedes and Ninos signalizations, for example). The City is interested in working with CalTrans in a similar manner in order to provide the proposed pedestrian crossing. The project includes a mid-block crosswalk to/from the Park and Transportation Research Board research (TRB Record 1141, 1987) suggests that a crosswalk is warranted. The EIR authors assume this issue will be discussed between CalTrans and the City. Also, see revised text.

5-4 Internal emergency access is provided across the rear of the site on the pathways which connect the fire lane behind the hotel and the parking lot behind the west side of the park. Please refer to Figure III-3, Site Plan, for a depiction of this emergency access. It should also be noted that full access across the rear may be considered if Southern Pacific removes its spur line which is immediately south of the main railroad tracks. However, because Southern Pacific currently has no plans to remove this spur line, this remains only a future option.

5-5 Comment acknowledged; a permit will be obtained prior to construction within the CalTrans right-of-way. This EIR will serve as the project's environmental document for permitting purposes.

CITY OF SANTA BARBARA

Comment Letter 6

COMMUNITY DEVELOPMENT DEPT.

Planning Division 564-5470
Housing & Redevelopment Division 564-5461
Division of Land Use Controls 564-5485
Director's Office 564-5455
Fax Number 564-5477

April 9, 1993

630 GARDEN STREET
POST OFFICE BOX 1990
SANTA BARBARA, CA 93102-1990

Ms. Elizabeth Woodward, Chairman
Environmental Review Committee
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102-1990

RE: WATERFRONT PARK, HOTEL AND HOSTEL PROJECT (ENV92-0107) - COMMENTS ON DRAFT EIR

Dear Ms. Woodward,

Planning, Transportation and City Attorney Staff have reviewed the Draft EIR and have a number of comments. Substantive comments are included in this letter. Minor comments (typos and such) are included in Attachment 1.

	Page	Comment
		Introduction
6-1	iv	1.0, ¶ 1 - This paragraph is a little confusing. We suggest that you put all of the discussion of the Fiesta Park project into a separate paragraph following the discussion of the Coastal Commission conditions. Also, please include the Zoning and General Plan designations for the park and hotel site.
6-2	viii	Line 6 - "...unavoidable impacts on traffic, water supply and affordable housing to those which can be classified as community priority or government displacement projects and amendments to approved projects (refer to the Land..."
6-3	ix	1.0, ¶ 2, line 7 - residential use is one of the secondary uses on the site (not a primary use).
		Executive Summary
6-4	xiv	Visual Resources Impacts - The short-term vegetation removal/loss of skyline trees impact should be included here.
6-5	xv	Is there a way that the table can suggest that it is necessary to impose all of the mitigation measures in order to mitigate the related impact? It could be implied that any one of the measures is sufficient to mitigate the impact when reviewing the table.
6-6	xvii	Short-term Visual Resources Impact should be moved to Class I.
6-7	xxi	Please see comment on Biological Resources Section regarding the Moreton Bay Fig Tree.

	Page	Comment
		Project Description
6-8	17	1.0, ■ 2 - Delete Conditional Use Permit and discussion of off-site parking lot on Mason and Santa Barbara Streets. This relates to the park only and is already included in the Park Approvals list.
		Environmental Setting
6-9	20	2.0, lines 4 and 5 - The hostel site is designated Hotel and Related Commerce II and the zoning is HRC-2, S-D-3, Hotel and Related Commerce 2 in the Coastal Overlay Zone.
		Land Use Considerations
6-10	32	¶ after Policy 1.3, last line - "...Street and installation of traffic signals at the Cabrillo/Highway 101 off/on ramps being in place and operational..."
6-11	33	Policy 2-1.0 - This policy discusses the need to provide housing to meet the affordable demand generated by the project. Although the applicants have indicated that they will meet the provisions of the Housing Mitigation Ordinance, they have not demonstrated how they will comply. On that basis, we believe that project consistency with the policy should be "undetermined."
6-12	39	Policy 2.1 of the Circulation Element - Because there is a parking impact for the park, this project should be considered to be **potentially inconsistent** with this policy.
6-13	41	4.0, ¶ 2 - Add: "In addition, the proposed park building square footage has received a preliminary Community Priority project designation." Last 2 lines - This is misleading. Please include all provisions of Subsection 2 (Potential for Overriding Considerations).
6-14	42	Lines 2/3/4 - This discussion of potential consistency with the principles of sound community planning should reference the discussion of consistency with the General Plan, the Local Coastal Plan and other documents that lay out general planning principles for the City.
6-15	43	5.1 Visual Quality - This is not a Coastal Policy. It is contained in the Conservation Element and discussed on Pages 33/34. Please delete the reference here and renumber the following subsections.
6-16		5.2 Recreation, Policy 3.3 - Because there is a parking impact for the park, this project should be considered to be **potentially inconsistent** with this policy.
6-17	45/46	Policy 4.2 - The project will not obstruct view corridors only if the mitigation measures are carried out. In addition, as noted above, the parking for the park is inadequate to meet the demand; therefore, the park is **potentially inconsistent** with this policy.
6-18	48	Policy 11.5 - As noted above, the parking for the park is inadequate to meet the demand; therefore, the park is **potentially inconsistent** with this policy.
6-19	49	Policy 11.7 - This policy requires the replacement of lost public parking spaces. The applicant certainly intended to replace the lost spaces; however, because the parking demand is not met, we believe that the spaces are not replaced and, therefore, this project is **potentially inconsistent** with this policy.

	Page	Comment
6-20	52	Section 30251 - Include discussion of the short-term Class I visual impact. However, because no long-term significant impact on visual resources is created, the conclusion is still valid.
6-21	54-62	Throughout the discussion of the Specific Plan, the Specific Plan quotations are based on the proposed amendments to the Plan instead of the adopted Specific Plan. Please go carefully through the quotes contained in the EIR and the adopted Specific Plan to assure that the appropriate quotations have been included. In addition, include the Specific Plan showing proposed amendments as an Appendix to the EIR.
6-22		Based on this approach to quotations, the discussions should first focus on consistency with the approved Specific Plan and then note that, if the amendments are approved, the project would be consistent with the amended Plan.
6-23	55	¶ following first Specific Plan quotation - Add: "However, if the Specific Plan Amendment allowing hotel uses on Parcel B is approved, the project will be considered to be consistent with this provision of the Specific Plan."
6-24	56	¶ following 2. Parking - The park does not provide adequate parking to meet its demand; therefore, the project is **potentially inconsistent** with this section.
6-25	56/57	4. Public Improvements - The discussion of consistency following this Specific Plan section does not relate to the section. Please correct.
6-26	58	5. View Corridors/Distance Between Buildings - Consistency with 5.b. needs to be discussed.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Traffic, Circulation and Parking

Also see Transportation Staff comments.

6-27		There is no discussion in this section of the proposed unsignalized crosswalk on Cabrillo Boulevard at Carpinteria Street (See Site Plan, pg. 5). Are there any safety or traffic impacts from its placement? Does Caltrans have any concerns?
6-28	78	Footnote 13 - Are trucks with a 40 cubic yard capacity realistic? This capacity seems quite high. If this number needs to be revised so that the number of truck trips increase, the air emissions calculations will also need to be adjusted.
6-29	80	¶ 3, last 2 lines - Dividing 104 by 3.4 equals 31 vehicles. According to Table VIA-2 on pg. 81/82, this number is then multiplied by 2 to establish the total number of trips. This does not appear to be a correct trip generation assumption because 62 X 3.4 = 208 people entering or leaving the park. This calculation concern also applies to the weekday trip assumptions. The discussion says that there would be "approximately 104 net new people entering or leaving" the park during the peak period. Please make necessary modifications to the calculations and adjust impacts accordingly. This will also affect the air quality calculations.
6-30		¶ 5, last line - The total is 62 + 34 = 96 weekend PHTs - unless there are corrections per the above comment.

	Page	Comment
6-31	81/82	Table VIA-2 - Please include the entire hotel and park portions of this table on the same page. Otherwise, it is very confusing. Including the entire table on one page would be even better. Please calculate the ADTs for Net Hotel Trip Generation (this will require calculation of the existing ADTs). It appears that it may be appropriate to delete the multiplier for park trips at the top of page 82, as discussed in the comment on page 80.
6-32	87	2.5, ¶ 2 - Even though the post office will relocate south of the freeway, another use will likely locate in the old post office building. An assumption regarding future use should be made and the traffic calculated and included in the cumulative discussion.
6-33	101	2.5.6 County of Santa Barbara Congestion Management Plan - If this is just a repeat of the discussion in the Land Use Considerations section, it should be deleted here.
6-34	106	2.5.7 - Please summarize the impacts by highlighting them in bullet form. Also, delete the discussion of mitigation measures which have not yet been laid out (in following section).
6-35	107	Line 1 - There is no curb parking lane on the north side of Cabrillo Boulevard. Please adjust accordingly.
6-36		■ 2 - Add at the end: "In no case shall the Certificate of Occupancy for the hotel be issued prior to provision of a minimum of 100 spaces of additional parking in a manner acceptable to the City of Santa Barbara."
	Air Quality	
6-37	118	3.1, ¶ 2, lines 1/2 - This indicates a construction period of 16.5 months which would be equal to 5½ quarters (not 6½). The Project Description (p. 16) says that the construction period is approximately 18 months which would be 6 quarters. Please make determination and adjust air quality calculations if necessary.
6-38	121	Table VIB-3 - Should the projected air pollutant emissions be based on summer Sunday conditions that occur only 1/7 of the time during four months of the year? Or should they be based on weekday conditions? In addition, in reviewing the calculations on pages D-28 and D-29, there has been no correction for the net increase in trips. The calculations assume that the project results in entirely new trips. Please check the assumptions with APCD. APCD has stated to staff that the net increase in trips can be used. See APCD comment letter for discussion of other calculation revisions.
6-39	123	Consistency with AQAP - Please work with the APCD to make sure that this discussion is correct. We can see that a project might comply with all the Transportation Control Measures, follow the point source requirements and be consistent with the local General Plan and, therefore, be considered consistent with the AQAP. However, it is still difficult to believe that, if a project results in project-specific significant unavoidable impacts, it could be consistent with the AQAP.
6-40	124	4.1.1, ■ 2 - This mitigation measure which requires a longer construction period during the smog season appears to contradict a construction noise mitigation measure that limits construction to between 8 AM and 5 PM. Please clarify.
6-41	125/6	Mitigation of Long Term Impacts - It may also be appropriate to require that the project participate in any offset program developed and implemented by the APCD prior to the issuance of the Certificate of Occupancy to the project.

	Page	Comment
		Archaeological Resources
6-42	134	5.0 Mitigation Measures - Please note that the Initial Study includes a mitigation measure requiring archaeological monitoring during clearing and excavation.
		Historical Resources
6-43	138	The end of this section is missing. Please add.
		Visual Resources
6-44		We would like to consider the possibility of including a photograph of the park and hotel site, similar to Figure VIF-5, looking east-northeast from Chase Palm Park along Cabrillo Boulevard showing the park and hotel in place. Another possibility would be to do a simulation from Vantage Point 3 (Stearns Wharf). Finally, we would like to consider the preparation of a simulation for the hostel from Vantage Point 2 (Montecito Street).
		Risk of Upset
6-45	195	3.3.2, ¶ 1 - It should be noted that many of the at-grade crossings are rural and/or private and the standard precautionary warning installations are not in place.
		Hazardous Materials/Wastes
6-46	203/204	2.1.1 - This discussion indicates that groundwater extractions are not proposed as part of the project. How does this fit in with the proposal to use water that is "dewatered" from under the parking garage?
		Recreation
6-47	211	Project Impacts - Please continue to move this discussion away from local/neighborhood issues and toward community concerns.
		OTHER CEQA CONCERNS
6-48	229	2.0 - Please point out (4th ■) that by the very nature of the hostel, the majority of visitors arrive by mass transit (train or bus), foot or bicycle.
		GROWTH INDUCEMENT
6-49	230	1.0 - This discussion should also note that it is likely that high unemployment is likely to continue for another two to four years. (source?)
		ALTERNATIVES
6-50	234+	This discussion needs to include the other Class I impacts, parking for the park component and short-term visual impacts, in addition to the short- and long-term air quality impacts.
6-51	243	4.2.1, ¶ 2 - Because the proposed park is an active park and the park at the Wilcox Property is a passive park, the proposed park would generate more traffic, leading to significant traffic impacts.

	Page	Comment
		MITIGATION MONITORING FRAMEWORK
6-52	250+	This framework shows who is responsible for assuring that compliance with the various mitigation measures is achieved. However, it does not show who is actually responsible for completing the measure itself. As an example, there are a variety of requirements for NOx emissions reduction during construction. The framework shows that the Division of Land Use Controls is responsible for making sure that these measures are complied with; however, the contractor is responsible for carrying out these measures. Please add a column that shows responsibility for implementing the mitigation measures or otherwise indicate responsibility.
6-53	250	VI-A-2, Column 2 - Revise this measure per the comment on Page 107 (no curb parking lane on the north side of Cabrillo Boulevard).
6-54	253	VI-B-7, Columns 3/4 - This educational program should be prepared and approved by City Transportation prior to issuance of the Certificate of Occupancy. The implementation of the program would be ongoing.
6-55		VI-B-8, Column 4 - The APCD should be involved in the review of design features to reduce stationary source emissions.

Thank you for the opportunity to comment.

Sincerely,

Janice M. Hubbell

Janice M. Hubbell, AICP
Project Planner

Attachment

1. Minor Comments

[jh/park/deir-com.ltr]

ATTACHMENT 1

MINOR COMMENTS ON DRAFT EIR

WATERFRONT PARK, HOTEL AND HOSTEL

General Comments

- The titles of sections, chapters, tables and figures in the Table of Contents do not always match those in the body of the report. The needed changes are noted here.
- "Waterfront Area" should always be capitalized, as should "Eastside Area" and other neighborhood designations.

Page	Comment
Table of Contents	
i	VI.E. - "Noise and Vibration"
	VI.I. - "Hazardous Materials/Wastes"
	IX.B. - Irreversible ~~Effects~~ Environmental Changes"
ii	Line 4 - "Table V-1 Policy Summary Matrix 8"
	Table VIA-1 - "Existing Peak Hour Intersection ~~LOS~~ Operating Conditions"
	Table VIA-5 - "Peak Hour Intersection ~~LOS~~ Operating Conditions Cumulative"
3-56	Table VIA-6 - "Peak Hour Intersection ~~LOS~~ Operating Conditions Cumulative + Project"
	Table VIA-7 - "Peak Hour Inter. ~~LOS~~ Operating Conditions Cumulative + Project + St. Extensions"
	Table VIA-9 - "Peak Hour Inter. ~~LOS~~ Operating Conditions Cumulative + Project + Salsipuedes St."
	Table VIB-4 - "Maximum Pollutant Concentrations at Selected Intersections"
	Table VIE-1 - "Railroad Noise Contour Locations for Park and Hotel Site"
	Table VIE-4 - "Railroad Noise Contour Locations for Youth Hostel"
	Table VIII-2 - "Hotel Revenue Per Room by Community, South Coast Area"
iii	Figure V-1 - "~~Existing~~ Zoning Map"
	Figure VIF-4 - "~~Photos of Site From Cabrillo Boulevard/Chase Palm Park~~ Photographs of Park and Hotel Site"
	Figure VIF-6 - "Photographs from Vantage Points of Hostel Site"
	Figure XI-1 - "~~Location of~~ Alternative Project Sites"
Introduction	
iv	A., line 4 - "...10 acre public park; 2) the..."
	A., line 5 - "...luxury hotel; and 3)..."

Page	Comment
	1.0, ¶ 1, line 2 - "...Family Trust (7.943 acres);"
v	2.0 - Include the Zoning and General Plan designations for the Hostel site.
vi	Line 4 - "Specifically, Section 15151 of the Guidelines states:"
	Last ¶, line 1 - "...project and, therefore, are..."
Executive Summary	
x	1.0, line 1 - "...demand is 14,850 AFY..."
	1.0, line 2 - projected water demand has been adjusted to 10,500 AFY.
xi	3.0, ¶ 1, line 6 - "...additional ~~local~~ recreational facilities..."
	3.0, ¶ 1, line 7 - Delete "local"
	3.0, ¶ 1, lines 12/13 - "...and the Santa Barbara ~~City's~~ Cemetery to the east. ..."
	3.0, ¶ 2, last line - "...to occur, ~~as a result of~~ due to the previous development of the site.
6-56 cont. xii	Last ¶, line 5 - "...and would, therefore, ..."
	This page number occurs twice, the second time it appears is as the beginning of the Summary table. Please renumber.
xii	(2nd one), Air Quality, 1st mitigation measure, line 3 - "...in proper tune ~~as~~ per..."
xv	2nd impact, line 2 - "...potentially ~~hotel~~ significant..."
	6th mitigation measure, line 1 - "Salsipuedes Streets shall be..."
xvi	1st impact, line 4 - "...impacts to the users of the proposed..."
	2nd mitigation measure - Does this just apply to the windows on the hotel side adjacent to the railroad or to all hotel windows?
xix	1st mitigation measure, last line - Add: "and implement it."
xxi	2nd mitigation measure, line 5 - "...~~satisfy~~ exceed the restoration ratio of..."
Project Description	
1	1.0, line 9 - "...owned by Southern Pacific Transportation Company (SPTC). ..."
	2.0, line 6 - "...noted that the Parker Family Trust..."
4	Table III-1 - "~~Park, Hotel and Hostel~~ Project Sites' Assessor Parcels"
8	Table III-2 - "Play Area"

Page	Comment
	Table III-2 - Park Total is 440,261 s.f.. The total shown is the total for the park and hotel site.
9	■ 2, line 2 - "...foot tot lot located for parental..."
10	■ 1 - "A 147_seat formal dining room"
	■ 6 - "...deck, gardens, and gazebos"
11	2.3, line 4 - "...for shared used with Red Lion. ..."
12	Delete first line (repeat of last line on pg. 11).
14	3.3, line 6 - "...guests. Also on Chapala Street, ..."
Environmental Setting	
19	B.1.0 - Include the Zoning and General Plan designations here.
	B.1.0, ¶ 1, line 8 "...are visitor-serving uses in accordance with...".
20	Line 2 - "...City Waterfront Department with..."
6-56 cont.	Line 3 - "...of the Waterfront Area. The single-..."
	Line 6 - "vitamins and natural stimulants ~~for the public~~."
	2.0, ¶ 2, line 1 - "...four parcels ~~legally~~ known as..."
Land Use Considerations	
	Wherever it indicates in this section that the project "is deemed to be" consistent or potentially inconsistent with a policy, we recommend that the language be revised to "is considered to be" consistent or potentially inconsistent or "is" consistent or potentially inconsistent.
21	¶ 2, line 7 - "...Cabrillo Boulevard ~~Bike Path~~ Beachway runs parallel to..."
22	B., ¶ 1, line 2 - Delete "Designation"
24	Figure V-2 - "Existing and Proposed Specific Plan Map"
	Also, show "Existing" and "Proposed" on the Figure for the 2 maps.
27	Table V-1, Circulation Element Policy 3.3 - The discussion concludes that the project is consistent with this policy.
	Table V-1, LCP Recreation Policy 3.3 - Because there is a parking impact for the park, this project is potentially inconsistent with this policy.
28	Table V-1, LCP Pub. Ser. Policy 11.5 - Because there is a parking impact for the park, this project is potentially inconsistent with this policy.
	Table V-1, Section 30253 Development 3 - ARB - Spell out.

Page	Comment
30	¶ 2, line 3 - "impacts and affordable housing ~~demands~~ (see Growth..."
	¶ 2, line 7 - "...the project would result in significant unavoidable adverse impacts and could not be approved under this Charter Section ~~must be denied~~. The new..."
31	2.1, ¶ 1, line 5 - "hotel), the language in the accompanying text applies only to the..."
	Policy 1.1 does not relate to the heading above. This policy should be under "2.1.2 Land Use Element Policies"
36	2.4, ¶ 3, line 1 - "...mitigation measures required..."
40	¶ after Policy 3.1, line 1 - "...system management plan required..."
	¶ after Policy 3.4, line 2 - "...management plan required..."
42	¶ 1, line 11 - "The area of greater concern, however, is..."
	¶ 1, line 14 - "...the U.S. 101 Highway. ..."
	¶ 1, line 15 - "...traffic signals as a ~~temporary~~ interim measure. ..."
43	Line 1 - "...within the coastal zone..."
45	Policy 4.2, lines 1/2 - The end of line 1 and line 2 need to be in italics.
46	line 6 - "...special events. ~~However,~~ To satisfy..."
47	Line 2 - "...Redevelopment Agency. However,..."
	¶ after Policy 6.1, line 1 - "...preserve, restore, and expand..."
48	Policy 11.5, line 1 - "...the Waterfront area, excepting Stearns Wharf shall..."
49	¶ after Policy 11.11, lines 1/2 - "...this EIR. ~~However,~~ Given that submittal..."
53	2nd to last line - "...Air Resources Control..."
55	Lines 1/2 - "...if Parcel B is not acquired, ..."
56	Line 3 - "...U.S. Highway 101 has been..."
56/57	The quote from the Specific Plan should be entirely within italics.
58	¶ following #5, line 1 - "...because a view..."
62	8.0, ¶ 1, line 1 - "...as part of the ~~project's~~ Specific Plan approval by the..."
	8.0, ¶ 1, line 3 - "... Presently, this condition..."
	8.0, ¶ 1, line 4 - "...to 2.0 acres, unless a..."

6-56 cont.

Page	Comment
63	■ 4, line 1 - "...and regulations or..."
	9.2, ¶ 1, line 5 - "...Specific Plan No. 1, it is..."
64	¶ 4, lines 3/4 - "...other General Plan, and Local..."
65	Line 1 - "...control measures, and..."
	Line 3 - "...proposed project, and which..."
	Line 4 - "...with AQAP TCMs for this project. Space..."
65	10.2, ¶ 1, line 1 - "In June, 1990, California..."
	10.2, ¶ 1, line 3 - "...to prepare, adopt, and annually..."
	10.2, ¶ 1, line 6 - "...county, and city transportation..."
66	¶ after quote, lines 1/2 - "...criteria above, and would, therefore, be considered..."
	10.3, ¶ 1, line 8 - "...hazardous waste facilities, and..."
69	Line 4 - "It is not now required..."

6-56 cont.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Traffic, Circulation and Parking

Also see Transportation Staff comments.

70	1.1, ¶ 2. line 3 - "...California ~~State~~ Department of..."
71	¶ 4, line 6 - Salsipuedes Street presently ~~does not cross~~ is not connected across the Southern Pacific Railroad tracks. ..."
73	1.3, ¶ 1, line 3 - "...operation, with the results..."
	Footnote 11, line 1 - "...in a crosswalk ~~to~~ at the intersection..."
74	Table VIA-1 - This table should indicate when the counts were made.
77	¶ 5, line 3 - "at LOS "D" (V/C = 0.85) during the weekend[?] peak hour, affected by..."
	¶ 5, lines 5/6 - "...results in longer delays during the peak hour. The Milpas..."
	Last ¶, line 3 - According to Table VIA-1, Garden/101 SB operates at LOS "B" during weekday peaks.
78	2.1, line 2 - "...park/hotel site, 23,100 cubic yards..."
79	Last line - "...Project EIR. ~~The~~ Subtraction of the existing 20..."

Page	Comment
80	First line - "~~Applying~~ Subtracting the existing..."
85	2.3.4, line 7 - "...result in project-specific significant adverse..."
	2.4.2, ¶ 2 - 9 existing spaces would be lost, not 15. The net total park needs would be 81 spaces.
86	¶ 3, last line - Bring to end of previous line.
88	¶ 1, line 4 - "...(toward City College)..."
	2.5.1, ¶ 1, line 8 - "...City's threshold of 0.77. The..."
	2.5.1, ¶ 4, line 1 - "Under this scenario, the cumulative impacts at..."
99	¶ 5, line 7 - "...to Cabrillo Boulevard, and the train..."
	¶ 6, line 9 - "...from 0.74 to 0.77, during the..."
101	2.5.4, ¶ 1, lines 1/2 - "...extension, ~~traffic~~ cumulative traffic..."
	2.5.4, ¶ 1, line 7 - "...Street extension, and the..."
6-56 cont.	2.5.4, ¶ 3, line 3 - "...congestion problems would benefit from..."
106	2.5.7, line 2 - "project access on Salsipuedes Street, available parking..."
	2.5.7, lines 3/4 - "...and no lef~~oot~~-turn lane..."
	2.5.7, line 8 - "...would not ~~operate~~ be within City..."
	2.5.7, line 11 - "...intersection conditions to better than existing conditions; however, the..."
	2.5.7, line 14 - "...operation would still be..."
107	3.3, line 5 - "...required to reduce hotel access and..."
	3.3, ■ 1, line 2 - "...and a lef~~oot~~-turn..."
	3.3, ■ 2, line 6 - "...Red Lion ~~Hotel~~ Resort. ..."
	3.3, ■ 2, line 8 - Replace "should" with "shall".
	Last line - "...experience operating conditions ~~above~~ in excess of the City standards..."
109	4.0, ¶ 1, line 3 - "...Ramps-Carpinteria, ~~operate above~~ exceed standard limits. ..."
	4.0, ¶ 1, last line - "...Muerto, would ~~operate above~~ exceed standard limits."
	4.0, ¶ 2, lines 2/3 - "...continue to ~~operate above~~ exceed the City's standard LOS limit..."
110	¶ 1, line 8 - "...both extensions), but the..."

Page	Comment
Air Quality	
112	¶ 1, lines 2/3 - "...emitted pollutants~~,~~ or precursors. ..."
	¶ 1, line 5 - "several hours af~~oo~~ter they are emitted..."
	1.3, ¶ 1, line 1 - Cool, dry summers or warm?
	1.3, ¶ 2, line 2 - "...and shif~~oo~~ts to the south, ..."
	1.3, ¶ 2, line 4 - "shif~~oo~~ting winds and..."
	1.3, ¶ 3, line 2 - "of~~oo~~ten occurs along..."
	1.3, ¶ 4, line 1 - "Fog and stratus clouds of~~oo~~ten ..."
113	¶ 3, line 4 - "Santa Ana conditions of~~oo~~ten result..."
	1.4, ¶ 2, line 1 - "The CARB has also..."
117	1.4.5, ¶ 2, line 2 - "...by themselves~~,~~ or may..."
	1.4.5, ¶ 3, lines 2/3 - "...the Goleta station; those from 1989..."
	1.4.6, line 3 - "...the past fif~~oo~~teen years. ..."
6-56 cont. 120	¶ 3, line 1 - "...threshold levels~~,~~ and would, therefore, be..."
	3.2, line 3 - "...days per week~~,~~ and the weekend..."
	3.2, line 9 - "...URBEMIS3 program~~,~~ and upon..."
124	4.1.1, ■ 1, line 1 - "...proper tune ~~as~~ per..."
	4.1.1, ■ 2, line 1 - "...the daily construction period ~~should~~ shall be lengthened..."
	4.1.2, ■ 1a, line 3 - "...a crust af~~oo~~ter each..."
	4.1.2, ■ 1b, line 1 - "Af~~oo~~ter clearing, ..."
	4.1.2, ■ 1c, line 3 - "...late morning and af~~oo~~ter work..."
125	4.2, ■ 1, line 5 - Replace "should" with "shall".
Archaeological Resources	
127	1.1, ¶ 3, line 5 - "...was part of ~~was~~ a larger..."
128	¶ 2, line 2 - "...Cultural Resources ~~Element~~ Section of..."
	¶ 2, line 9 - "...property, ~~and~~ not cultural deposits..."

Page	Comment
130	Line 4 - "...each unit was lefeet to provide..."
	Last ¶, line 3 - "Structures, paved surfaces,- and land..."
	Last ¶, line 5 - "...trenches, exposed banks,- and shovel..."
131	Line 1 - "...walkways,- and/or gravel, ..."
	2.3, line 2 - "...discarded afeeter careful..."
132	3.1.3, ¶ 1, line 3 - "...items,- (ceramic cups and..."
	3.1.3, ¶ 1, line 9 - "...until afeeter 1976..."
Historical Resources	
135	1.0, ¶ 4, line 1 - "From 1924 to 1962, the facility..."
	1.0, ¶ 4, line 2 - "ocean. Afeeter Santa Barbara..."
	1.0, ¶ 4, line 4 - "1972 to 1974, the City Parks..."
136	Line 1 - "openings elsewhere are deeply..."
6-56 cont.	1.1.2, line 1 - "In 1977, the City..."
	1.1.2, line 4 - "feature, site,- or area..."
137	■ 7, line 2 - "...or crafeetsmanship;"
	Last ¶, line 6 - "throughout the City that..."
	Last ¶, line 7 - "...private citizens, working mainly..."
138	¶ 2, line 6 - "...have been closed,- and the remaining..."
	¶ 2, line 9 - "...has been closed,- and double..."
Noise and Vibration	
140	1.0, last line - "control measures as required..."
141	¶ 2, line 1 - "In addition, noises from different..."
143	1.2.3, line 2 - "... In addition, the Ldn..."
144	2.1.1, lines 2 & 3 "Amtrak"
	2.1.1, line 3 - "and once southbound,- and the San..."
146	Line 1 - "...of December 22, 1992, demonstrate the..."

Page	Comment
148	2.1.2, line 3 - "...the Amtrak San Diegan..."
150	Table VIE-5 - Add "Distance - feet" to the title of the last two columns.
153	2.3.1, ¶ 1, line 4 - "...equipment of a type similar..."
157	3.2.1, lines 1/2 - "...shall be ~~located~~ completed to avoid..."
	3.3.1, ■ 2, line 2 - "...building responses, and to..."
	Last ¶ - Please delete this statement since the issue is already covered in the Residual Impact Statement on page 158.
158	■ 2, last line - "...for uneven segments, and all..."
Visual Resources	
159	"F. ~~AESTHETIC~~ VISUAL RESOURCES"
162	Line 3 - "...relatively small, yet active, industrial..."
165	Table VIF-1 - "Tree/Shrub Inventory for Park and Hotel Site"
	¶ 1, line 6 - "than smaller shrubs, and are, therefore, aesthetically..."
167	¶ 1 - Add to the end: "of the site, although it does offer a view corridor for more distant views."
172	¶ 2, line 6 - "...established in an effort to reduce..."
	¶ 2, line 25 - "...have the potential to block a..."
175	¶ 2, last line - "...mid-ground view, and the Santa..."
176	¶ 2, line 10 - "...considered insignificant, and a degradation..."
178	Figure VIF-6 - "Photographs From Vantage Points of Hostel Site"
179	"..diverts the viewer's attention to..."
180	¶ 2, line 3 - "Street, the Moreton Bay Fig..."
	¶ 4, line 7 - "...would result in ~~the~~ view blockage..."
Biological Resources	
183	1.1, ¶ 1, line 3 - "...(June 11, 1992), and the..."
	1.1, ¶ 2, line 3 - "...non-native plants, and surrounded..."
	1.1, ¶ 2, line 6 - "...existing buildings, and a..."
	1.1, ¶ 2, line 10 - "by homeless people, and there is..."

-56 cont.

Page	Comment
184	1.1.2, ¶ 2, line 3 - "...such as mockingbird, scrub jay..."
	1.1.2, ¶ 2, line 4 - "...house finch, and various sparrows. ..."
185	Line 1 - "..of the site, and the project..."
	Line 4 - "...U.S. Highway 101. ~~, and~~ It enters the..."
	¶ 2, line 1 - "...generally steep, and vegetated primarily..."
	¶ 2, line 4 - "...(S. californicus), and sedge..."
	¶ 2, line 10 - "...natural areas, ~~and~~ particularly..."
	¶ 4, lines 1/2 - "According to ~~a~~ botanic surveys..."
	¶ 4, line 6 - Is this Cabrillo Park or Chase Palm Park?
	¶ 4, line 11 - "...(S. californicus), and sedge..."
186	¶ 1, line 6 - "Streets, and the canopy..."
	¶ 1, line 12 - "another ~~approximate~~ 20-40 feet. ..."
6-56 cont.	2.1.1, ¶ 1, last line - "site, and the anticipated..."
	2.1.1, ¶ 2, last line - "...could be ~~avoided~~ reduced to less than significant through..."
	Footnote 66 - "...November, 1991."
187	2.1.2, ¶ 2, line 5 - ...non-native plants, and the planting..."
	2.1.2, ¶ 3, line 8 - "...satisfy either ratio, and impacts..."
	Last line - "...cross-town freeway, and stated that..."
188	¶ 2, line 3 - "...surface roots, and carving..."
	¶ 2, line 5 - "...from foot traffic, and damage..."
	¶ 2, line 8 - "...proposed hostel, and the City's..."
Risk of Upset	
190	¶ 1, line 5 - "...this area daily, and six freight..."
	¶ 2, line 2 - "...this vicinity; therefore, northbound..."
192	Table VIH-1, row 1, line 1 - "...resident, tenant, or..."
	¶ 1, line 2 - "...Waterfront Park, Hotel, and Hostel Project. ..."

Page	Comment
	¶ 1, line 3 - "...collision; 2) collision between..."
	¶ 1, line 4 - "...direction); and 3) train..."
	3.1, ¶ 1, line 6 - "...at this speed), and..."
193	¶ 2, line 4 - "reports on train accidents, and a Liquid..."
	¶ 2, line 8 - "...straight for 2.5 miles; train speeds..."
	3.2, ¶ 1, line 3 - "...signals at crossings, and the..."
	3.2, ¶ 2, line 1 - "Derailment of a passing train, or a train to train..."
194	¶ 2, line 4 - "...significance" category, and would, therefore, be..."
	Last ¶, line 7 - "...of the railroad tracks. ..."
195	3.3.2, ¶ 1, line 7 - "...bicycles, trucks, and automobiles. ..."
197	■ 2, line 2 - "...and the hostel site), and a ..."
	■ 3, line 3 - "hostel areas, and any interior..."
	6.0, line 6 - "...in the vicinity, and earthquakes..."
6-56 cont.	Hazardous Materials/Wastes
198	¶ 3, line 7 - "...contaminated property, and the level..."
	¶ 4, line 1 - "HWCL is the California ~~state~~ equivalent..."
	Footnote 78, line 3 - "...hazardous waste, and such..."
	Footnote 78, line 5 - "information, and are designed..."
	Footnote 79, line 3 - "...consistency with RCRA, and California..."
199	Line 3 - "...RCRA within California, and..."
	Lines 4/5 - "...county governments, through a..."
	¶ 3, lines 2/3 - "...the CWA and SDWA, and, therefore, California..."
	¶ 3, line 5 - "Cologne, CWA and SDWA. ..."
	¶ 3, last line - "RWQCB, which is headquartered in ..."
	Last line - "...hazardous, and, therefore, contamination..."
200	¶ 1, line 7 - "...from the site, and the..."

Page	Comment
	Footnote 81, line 2 - "...site inspection, and consideration..."
201	Line 1 - "Boulevard, and the area..."
	Line 4 - "...to Laguna Channel, and a small..."
	Line 11 - "...as hazardous, and, therefore, contamination..."
202	¶ 2, line 9 - "contaminant levels, and these..."
	¶ 2, last line - "...as hazardous, and, therefore, no further..."
	¶ 3, line 4 - "the contamination, and to determine..."
	¶ 3, lines 9/10 - "...the LFT property, and instead..."
	¶ 3, line 18 - "...of remediation, or acceptable..."
203	Line 4 - "...right-of-way, and would have..."
	2.0, line 4 - "...materials involved, and all..."
6-56	2.1.1, lines 7/8 - "Lead is toxic, and can lead to..."
cont.	Last line - "...and analyzed, and has been found..."
204	Line 1 - "...laterally or vertically, and an..."
	¶ 2, line 1 - "...substances; however, the..."
	2.1.2, line 2 - "of Cabrillo Boulevard, and the Carousel..."
205	2.2, ¶ 1, line 2 - "...hazardous elements, or may..."
	2.2, ¶ 1, line 4 - "...would be low, and would..."
	2.2, ¶ 1, line 7 - "...design plans, and the..."
	2.2, ¶ 2, line 6 - "which are solvent-based, and which..."
	2.2, ¶ 2, line 8 - "...hotel or hostel ~~would~~ exceed..."
206	¶ 1, line 3 - "...Materials Act, and would review..."
	■ 1, line 4 - "...shall be completed, and soil..."
	■ 1, line 5 - "...acceptable levels, prior to the..."
	■ 2, line 5 - "...shall be completed, and soil..."
	■ 2, line 6 - "...acceptable levels, prior to the..."

Page	Comment
	■ 3, line 6 - "...acceptable levels, prior to the..."
	■ 3, line 8 - "...remediation efforts, and may be..."
207	■ 2, line 2 - "...Plan, as applicable, with respect..."
Recreation	
208	1.0, ¶ 2, line 2 - "...adjacent and to the east of..."
	Footnote 65 - This should be Footnote 83 and all following footnotes need to be renumbered.
211	¶ 3, line 2 - "...games, a pool table, and ping pong..."
	Footnote 67 - Check these numbers with Mark Taylor of the Housing and Redevelopment Division. He is in charge of census data.
212	Line 6 - "Waterfront also utilize the parks, and these..."
	¶ 2, line 4 - "Waterfront ~~park~~ neighborhood..."
	¶ 2, line 11 - "are ~~utilized~~ developed to serve the..."
6-56 cont.	¶ 2, line 12 - "neighborhood. (see the Traffic and Circulation section of this EIR), which would make..."
	¶ 3, line 3 - "...proposed project, (hotel and ..."
	¶ 3, line 4 - "...to the Waterfront Area ~~park vicinity~~, which..."
	¶ 3, line 7 - "serve to ~~provide~~ improve access to parks and..."
	3.0, line 1 - "...Waterfront Park, Hotel and Hostel Project..."
IMPACTS NOT FOUND SIGNIFICANT	
213	¶ 1, line 5 - "...the short-term, emergency..."
	Footnote 69 - This AFY equivalent is out of date - or only applies to large lot single family development.
214	¶ 2, line 3 - "...Salsipuedes Street, and..."
	¶ 4, line 2 - "...drainage systems, and the site's..."
ECONOMIC AND FISCAL ANALYSIS	
215	"VIII. ECONOMIC AND FISCAL ~~IMPACTS~~ ANALYSIS"
	2.0, ¶ 2, line 2 - "...new inventory, and declined..."
218	3.2, ¶ 2, line 3 - "...extensive amenities, and..."
220	4.0, ¶ 3, last line - "service costs, and each..."

Page	Comment
226	■ 5 - It's a 10 acre park.
OTHER CEQA CONCERNS	
227	1.0, ¶ 1, line 2 - "...City's Waterfront ~~District~~ Department and..."
	1.0, ¶ 2, line 3 - "...the Waterfront ~~District's~~ Department's administrative offices~~,~~ and would..."
	1.0, ¶ 2, line 12 - "However, the long-term change in..."
	1.0, ¶ 2, line 15 - "...City's Waterfront ~~District~~ Department with..."
	1.0, ¶ 2, last line - "..for City park employees and a recreational facility for the public."
228	Lines 1/2 - "...for additional local and community-wide recreational facilities ~~within~~ near the Eastside, ..."
	Lines 6/7 - "...did not offer ~~as large~~ a significant public benefit as does the currently proposed..."
	2.0, ¶ 1, line 5 - "...undeveloped, unvegetated~~,~~ open space, ..."
	2.0, ¶ 2 - There is now a hostel at 409 State Street in the Savoy Hotel building.
	2.0, ¶ 3, line 5 - "...Santa Barbara ~~City's~~ Cemetery..."
6-56 cont.	Footnote 70 - Also reference the ERA report.
229	Lines 6/7 - "This tree removal would be offset by the introduction of 441 new trees, as well as other landscaping, resulting in only a short-term loss of mature trees and shrubs."
	¶ 2, line 2 - "...energy sources~~,~~ and air quality..."
	¶ 2, line 10 - "...the County~~,~~ and generally..."
	2.0, ¶ 2, line 1 - "...current energy demands ~~existing~~ on-site."
GROWTH INDUCEMENT	
230	Line 5 - "...to the region; 2) the associated increase in affordable housing demand; ..."
231	Line 4 - "...South Coast area~~,~~ and the..."
	Line 8 - "allowed for in using the RGIS formula. ..."
	¶ 2, last line - "...Santa Barbara~~,~~ and that almost all service-level positions would be filled by locals residents."
ALTERNATIVES	
234	¶ 2, line 5 - "...air quality impacts, parking impacts for the park component and short-term visual impacts. Therefore, this..."
235	Line 2 - "...ten acre park~~,~~ and the fiscal ~~impacts~~ benefits of a luxury hotel~~)~~."

Page	Comment
	¶ 2, line 4 - "...unproductive area~~,~~ nor would..."
	2.0, ¶ 2, line 5 - "...air quality impacts~~,~~ would remain..."
	2.0, ¶ 2, last line - "...150 room hotel, as would parking impacts in the park and short-term visual impacts associated with the removal of mature trees and shrubs."
	2.0, ¶ 3, last line - "two stories~~,~~ which would..."
236	Line 1 - "...result in significant unavoidable impacts."
237	4.0, lines 8/9 - "examined including~~;~~ the Wilcox property, the Montecito Country Club, the Jesuit property (Rancho Las Positas)~~;~~ and the Southern Pacific..."
239	¶ 1, last line - The Cypress Point Supplemental EIR is scheduled for certification on May 14, 1993.
	¶ 2, line 5 - "aesthetics and water supply ~~impacts.~~
	¶ 2, line 7 - "...resources. ~~The~~ Arroyo Burro Creek..."
	¶ 4, line 2 - "there are also land use impacts that would ~~also~~ occur. ..."
	Last ¶, line 2 - "...resort hotel to residential~~,~~ and the property..."
240	4.1.2, ¶ 2, line 1 - "...zoned A-2, single family, with a..."
6-56 cont. 241	¶ 4, line 4 - "...points in Montecito~~,~~ and particularly..."
	¶ 4, line 5 - "...Montecito Country Club is..."
	¶ 4 - This location would also suffer from short-term aesthetics impacts related to the loss of mature skyline trees and shrubs.
242	¶ 2, line 7 - "...service constraints~~,~~ and traffic..."
	¶ 3, line 6 - "species; ~~and~~ a variety of other..."
	¶ 4, line 3 - Replace "Mesa Lane" with "Cliff Drive".
	¶ 5, line 2 - "significant levels~~,~~ and could..."
	¶ 5, lines 3/4 - "...resultant from ~~locating~~ building a hotel at this location. ..."
	4.1.4, line 1 - "This alternative is situated in the ~~east side~~ industrial ~~area of the City, west~~ portion of the Waterfront Area."
243	4.2.1, ¶ 1, line 6 - "access and parking~~,~~ and could..."
	4.2.1, ¶ 1, lines 9/10 - "...need for an active park in..."
	4.2.2, line 3 - "...access constraints~~,~~ and geological/seismic impacts. ..."

Page	Comment
244	Line 2 - "...an additional active park directly adjacent to Las Positas Park..."
	4.3.1, ¶ 2, line 2 - "...biological resources, ~~and~~ is flat, ..."
	4.3.1, ¶ 2, line 4 - "...be investigated, in that..."
	4.3.1, ¶ 2, line 5 - "... Noise and risk of upset impacts may be..."
	4.3.1, ¶ 2, line 6 - "proposed site, due to the..."
	4.3.1, ¶ 3, line 5 - "impacts, and that the..."
	4.3.2, line 2 - The Cafe 101 is now closed.
245	5.0, ¶ 2, line 10 - "...calls for a "Mercado", east of..."
	5.0, ¶ 3, line 10 - "...available and, therefore, these..."
246	¶ 2, line 5 - "...govern the Waterfront ~~district~~ Area. According..."
	6.0, ¶ 1, line 4 - "...park site but, given the site's limited size, ..."
	6.0, ¶ 2, line 2 - "...City-owned, public land, which..."
6-56 cont. 247	Line 2 - "...a pool table, and/or ping pong..."
	Line 4 - "...such as ~~volleyball,~~ badminton, croquet and volleyball."
	B, ¶ 1, line 2 - "It must be noted, however, that..."
	B, ¶ 1, line 5 - "...alternative is, therefore, not..."
	B, ¶ 2, line 5 - "...Design, project would..."
	B, ¶ 2, line 6 - "...and would, therefore, be..."
	B, ¶ 2, last line - "...and are, therefore, unrelated..."
248	Table XI-1 - The Proposed Project column adds up to 15 and the Alternative Design column adds up to 14.
MITIGATION MONITORING FRAMEWORK	
249	¶ 1, line 1 - "By law (~~new State legislation~~ Assembly Bill 3180), agencies must..." [not new anymore]
	¶ 1, line 5 - "...in the EIR, and as adopted..."
	¶ 1, line 8 - "...of the mitigations, and, if appropriate, identifies..."
	¶ 3, line 1 - "...and conditions, which have been..."
250	VI-A-2, column 2, line 3 - "...shall queue on site, and..."

Page	Comment
251	VI-A-7, column 3 - "Prior to issuance of Certificate of Occupancy."
	VI-A-8, column 3 - "Prior to issuance of Certificate of Occupancy."
	VI-B-1, column 2, line 5 - "condition/proper tune ~~as~~ per"
	VI-B-1, column 2, line 8 - "Oct.), the daily construction period"
252	VI-B-2, column 2, lines 17/18 - "...treated by watering~~,~~ or revegetating~~;~~ or by..."
253	VI-B-7, column 2, line 4 - "avoiding trips~~,~~ and use of all"
255	VI-E-6, column 2, line 3 - "hotel shall be ~~located~~ completed to avoid"
	VI-E-7, column 2, lines 3/4/5 - ""insertion, feasible alternative construction methods ~~feasible of~~ for replacing pile insertion shall"
	VI-E-8, column 4 - Replace "Community Development Department" with "Division of Land Use Controls"
	VI-H-1, column 2, line 2 - "shall be formulated for ~~the~~"
3-56 cont.	VI-H-1, column 3 - "Prior to issuance of Certificate of Occupancy."
256	VI-H-3, column 2, line 3 - "material~~,~~ and shall have"
	VI-H-3 and VI-H-4 - Compliance method should include site inspection by the Fire Department in addition to DLUC.
	VI-H-5, column 2, line 6 - "car collision~~,~~ and primary"
257	VI-H-6 - Compliance method should include site inspection by the Fire Department and the County Environmental Health Services Department in addition to DLUC.
	VI-I-1, column 2, last line - "~~building~~ grading permits."
258	VI-I-5, column 2, lines 3/4/5 - "Materials Inventory Statement~~,~~ and a Hazardous Materials Business Plan, as applicable."
REFERENCES AND SOURCES	
259	2.0 - "Hennon, Bettie, Senior..."

[jh/park/deir-com.att]

Response to Comment Letter 6

6-1 Comment acknowledged; please see revised text.

6-2 Comment acknowledged; please see revised text.

6-3 Comment acknowledged; please see revised text.

6-4 Comment acknowledged; please see revised text.

6-5 Comment acknowledged; please see revised text.

6-6 Comment acknowledged; please see revised text.

6-7 Comment acknowledged; please see revised text.

6-8 Comment acknowledged; please see revised text.

6-9 Comment acknowledged; please see revised text.

6-10: Comment acknowledged; please see revised text.

6-11 Comment acknowledged; please see revised text.

6-12 Comment acknowledged; please see revised text.

6-13 Comment acknowledged; please see revised text.

6-14 Comment acknowledged; please see revised text.

6-15 Comment acknowledged; please see revised text.

6-16 Comment acknowledged; please see revised text.

6-17 Comment acknowledged; please see revised text.

6-18 Comment acknowledged; please see revised text.

6-19 Comment acknowledged; please see revised text.

6-20: Comment acknowledged; please see revised text.

6-21 Comment acknowledged; please see revised text.

6-22 Comment acknowledged; please see revised text.

6-23 Comment acknowledged; please see revised text.

6-24 Comment acknowledged; please see revised text.

6-25 Comment acknowledged; please see revised text.

6-26 Comment acknowledged; please see revised text.

6-27 Please refer to response 5-3.

6-28 Recent input on the demolition process indicates that a larger 54 cubic yard truck would be used. Please see revised text.

6-29 Please refer to Response to Comment 1-2.

6-30 Comment acknowledged; please see revised text.

6-31 Comment acknowledged; please see revised Table VIA-2.

6-32 The cumulative analysis has been revised to include an office reuse in the existing 6,000 square foot Post Office building. Please see revised text.

6-33 This information has been left in in order to respond to comment letter 3 and 4.

6-34 Comment acknowledged; please see revised text.

6-35 Please refer to Response to Comment 1-24.

6-36 Although the EIR does not identify Hotel parking as a significant impact, it would be without the 100 spaces.

6-37 Comment acknowledged; the construction period would be 16.5 months. The reference in the Air Quality Section has been changed to accurately reflect a period of 5 1/2 quarters, and the Project Description has been revised to reflect a period of 16.5, not 18, months.

6-38 Comment acknowledged; however, some confusion apparently exists concerning the method for both traffic and air quality impact assessment. For traffic impact evaluation, the roadway network is evaluated using existing peak summer volumes as the baseline condition, in order to assess the worst-case scenario and to properly quantify the effects of added project traffic upon the system. The project trips that are added to the "baseline" roadway network condition are average weekday trips and average weekend day trips, not trips which would be anticipated to be generated by the proposed development during the peak summer season. The average trip generation rates were also used as the basis for the air quality analysis. Therefore, the projected emissions would occur throughout the year, not simply within the limited summer season. The analysis of long-term project emissions has been recalculated to provide a credit for existing trips at the park/hotel site. However, the revised project emissions would continue to marginally exceed the threshold on weekdays, and would significantly exceed the threshold on weekends. A project which would exceed the peak hour based threshold every weekend would be considered to create a significant

impact. See also Comment Letter #2 from the Santa Barbara County Air Pollution Control District for an alternate method of quantifying long-term impacts of the project.

6-39 Comment acknowledged; however, the AQAP is a broad planning document which contains goals and policies regarding the improvement of air quality. As an analogy, the AQAP can be thought of as one element of a General Plan. It is relatively common for a project to have an environmental impact, and yet be found to be consistent with the General Plan because it conforms to the goals and policies therein. This is due to the fact that there are not stringent standards in the General Plan or AQAP, but rather guidelines and approaches for attainment of the Plan's goals and objectives. Hence, even though a project may exceed the numeric threshold for airborne emissions, it can still be considered to be consistent with the AQAP as long as certain programs and measures are incorporated on a project-specific or community-wide basis.

6-40 Comment acknowledged; however, the intent and function of the referenced mitigation measure have been misinterpreted. This standard APCD condition requires that less work be done each day (i.e., a smaller area of disturbance or fewer pieces of equipment used simultaneously), thus minimizing the concentration of project pollutants in the ambient air at any one time. By completing less work each day, the duration of the entire construction period is lengthened (as opposed to the working hours each day being lengthened).

6-41 Comment acknowledged; please see revised text.

6-42 Comment acknowledged; please see revised text.

6-43 Comment acknowledged; please see revised text.

6-44 Comment acknowledged; However, it is not within the scope of this EIR to provide additional computer simulations of the park and hotel site or the hostel site. According to State CEQA Guidelines, Section 15151 "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible." Figure VIF-5 provided in this EIR is rendered from what has been determined to be the worst-case viewing location and complete buildout of the proposed hotel is conveyed in this simulation. Therefore, it is the report preparer's professional opinion that additional computer simulations from other less significant viewing locations would be exhaustive and beyond what is reasonably feasible. In addition, it is anticipated that the result of additional project simulations from other vantage points would not change the impact classifications depicted in the Draft EIR (i.e., Class II - capable of being mitigated to levels of insignificance).

6-45 Comment acknowledged; please see revised text.

6-46 Comment acknowledged; please see revised text.

6-47 Comment acknowledged; please see revised text.

6-50 Comment acknowledged; please see revised text.

6-51 Comment acknowledged; please see revised text.

6-52 All the required mitigation measures would be carried out by the applicants and their construction contractors. The preparers of this report do not know which of the applicants (the Redevelopment Agency or the Parker Family Trust) will be responsible for the actual implementation of mitigation measures. For example, Omni-Means has requested assistance from the City in determining how much of the required street improvements should be attributed to the applicants since the existing situation on Milpas Street and at the Cabrillo/101 Intersection need to be improved without the proposed project. Omni-Means was told that each applicant's responsibility for funding the improvements would be resolved at a later date. Therefore, these details will need to be resolved by the RDA, the Parker Family Trust, and City. The EIR simply presents a framework for use in preparing the more detailed Mitigation Monitoring Program. The actual Mitigation Monitoring Program will be prepared later and will specify which of the applicants is responsible for actual implementation.

6-53 Comment acknowledged; please see revised text.

6-54 Comment acknowledged; please see revised text.

6-55 Comment acknowledged; please see revised text.

6-56 Comment acknowledged; please see revised text.

CITY OF SANTA BARBARA

Comment Letter 7

COMMUNITY DEVELOPMENT DEPT.

Planning Division 564-5470
Housing & Redevelopment Division 564-5461
Division of Land Use Controls 564-5485
Director's Office 564-5455
Fax Number 564-5477

630 GARDEN STREET
POST OFFICE BOX 1990
SANTA BARBARA, CA 93102-1990

April 26, 1993

Ms. Elizabeth Woodward, Chairman
Environmental Review Committee
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102-1990

RE: WATERFRONT PARK, HOTEL AND HOSTEL PROJECT (ENV92-0107) - COMMENTS ON DRAFT EIR

Dear Ms. Woodward,

As we indicated at the Environmental Review Committee (ERC) meeting on April 16, 1993, Planning Staff does have a few more comments on the Visual Resources Section of the Draft EIR, as follows:

	Page	Comment
7-1		Throughout the discussion of the park and hotel site, make sure that the discussion recognizes that this is a single site. When referring to the two site elements, the EIR should refer to "the park <u>portion of</u> the site" or "the hotel <u>portion of</u> the site."
7-2	160	1.1.1 - Please add more discussion of the positive aspects of the existing site. This should focus primarily on more distant views, on contributions of the existing trees to the skyline and blocking of views of the industrial area by existing vegetation.
7-3	162	1.2, ¶ 2, line 1 - "Visual impressions created by the site depict a ~~previously developed,~~ disturbed and vacant parcel."
7-4		1.2, ¶ 2 - In addition to the other aspects of this vacant site, it does provide a more open appearance in which to view the Moreton Bay Fig Tree.
7-5	164	2.1.1 - Include a discussion that the park and hotel site is approximately 2000 feet long and that the hotel will take up about 400 feet of the length or about 20%.
7-6	165	¶ 1, lines 17-19 - This period of significance lasts longer that the construction phase. It lasts until the new plantings mature to create a new skyline. We need to determine the length of time necessary to reach sufficient maturity to mitigate the impact. That will define the duration of the short term impact.

	Page	Comment
7-7	167/168	2.1.3 - This section needs a summary paragraph that reaches conclusions regarding the overall site. The second and third paragraphs discuss the site components; the final (new) paragraph would discuss the total site.
7-8	172	¶ 2, lines 9/10 - The current Specific Plan requires a 40 foot setback for one story and 75 foot setback for two story buildings from the property line along Salsipuedes Street. The Specific Plan Amendment includes a proposal to change that setback to 33.5 feet from the finished curb line of the widened Salsipuedes Street. This will result in a setback from the curb line being ** feet closer than presently allowed. Therefore, the hotel will not meet existing setbacks in the Specific Plan (lines 14/15).
7-9	173	¶ 1 - Delete the conclusion that new skyline trees by themselves results in a view impact.
7-10		¶ 2 - Again, delete the conclusion that the hotel by itself results in a view impact.
7-11		Add a third paragraph that puts the two parts of the hotel and park site together and concludes that the new skyline trees in combination with the hotel will result in visual impacts. This recognizes the site as a single entity.
7-12	175	Vantage Point 3 - Delete concluding sentences from paragraphs 2 and 3 and a new paragraph that looks at the total site and comes to the conclusion that park and hotel site development will not result in significant impacts on view from the Stearns Wharf vantage point.
7-13	175	Vantage Point 4 - Reorganize this subsection to be consistent with the organization for Vantage Point 3.
7-14	181	3.1, line 4 - "...required to reduce ~~both~~ park and hotel..."
7-15		4.0 - The Residual Impact Statement should be expanded to refer again to the totality of the site. The section should include a short discussion on balancing potential impacts; i.e., balancing development against open space, design trade-offs, etc..

Thank you again for the opportunity to comment.

Sincerely,

Janice M. Hubbell

Janice M. Hubbell, AICP
Project Planner

[jh/park/deircom2.ltr]

Response to Comment Letter 7

7-1 Comment acknowledged; please see revised text.

7-2 Comment acknowledged; please see revised text.

7-3 Comment acknowledged; please see revised text.

7-4 Comment acknowledged; please see revised text.

7-5 Comment acknowledged; please see revised text.

7-6 Comment acknowledged; the text has been revised to clarify and support short-term visual impact conclusions discussed in the paragraphs below. The report preparers also believe that the period of significance for short-term visual impacts associated with the loss of the park and hotel site's existing vegetation would last longer than the 16.5 month construction period. However, the report preparers disagree that a new skyline would have to be created in order to reduce short-term impacts to levels of insignificance. Although the proposed removal of existing large trees would alter the existing skyline, the alteration would be considered minimal as a result of the low number of skyline trees proposed for removal. In addition, the proposed project's Conceptual Landscape Plan illustrates that the majority of the large trees proposed for removal are located within clusters of other large trees. Therefore, the park and hotel site's existing skyline may be thinned by the proposed project's tree removal, but the overall changes to the existing skyline would be minimal. The reason for the proposed project resulting in short-term visual impacts is a direct result of overall vegetation removal, not the minimal alteration of the existing skyline. It should also be reiterated that the majority of the large trees proposed for removal are in poor health or have structural problems (refer to Tree Management Plan contained in Appendix G of this EIR). As recommended by Bill Spiewak, Certified Arborist, these existing trees in poor health have structural problems and should be removed to preserve the health and integrity of other healthy trees located on-site or for public safety reasons.

According to the proposed project's Landscape Architect, George Girvin, the planting of project vegetation would utilize a priority planting method that targets specific areas of the park and hotel site that are currently lacking significant vegetation or are considered to be visually sensitive from off-site viewing locations. The priority planting plan would entail planting these targeted areas with large container plantings (i.e., 48 inch boxes, 15 gallon pots, etc.) which would immediately enhance the visual appearance of these locations. In addition, the project's Landscape Architect has had discussion with the City of Santa Barbara's Arborist, Dan Condon, to begin the planting of these targeted areas prior to the completion of construction of other visually less significant areas, which would also speed up the visual enhancement of these targeted areas. The planting of the more heavily vegetated areas (i.e., the proposed Wilds, etc.) would utilize smaller 1 and 5 gallon container plantings, due to the large amount of existing vegetation. It should also be noted that the proposed planting of slow growing, longer-lived species (i.e., coastal live oak trees, etc.) would entail the integrated planting of faster growing, shorter-lived species between the slower growing, longer-lived species. The integrated planting of fast growing species would visually enhance the area planted with slow growing species until these slower growing species have matured. At the time when the slower growing, longer-lived species have matured and are in need of additional

growing space, the faster growing, shorter-lived species would be removed to allow for continued growth of the longer-lived, slower growing species. As a result of the information provided above, it is the report prepares opinion that short-term visual impacts would be reduced to levels of significance at the point when all project landscaping has been established (approximately 2 years from the start of construction).

7-7 Comment acknowledged; please see revised text.

7-8 Comment acknowledged; please see revised text.

7-9 Comment acknowledged; please see revised text.

7-10 Comment acknowledged; please see revised text.

7-11 Comment acknowledged; please see revised text.

7-12 Comment acknowledged; please see revised text.

7-13 Comment acknowledged; please see revised text.

7-14 Comment acknowledged; please see revised text.

7-15 Comment acknowledged; please see revised text.

CITY OF SANTA BARBARA

Comment Letter 8

COMMUNITY DEVELOPMENT DEPT.

Planning Division 564-5470
Housing & Redevelopment Division 564-5461
Division of Land Use Controls 564-5485
Director's Office 564-5455
Fax Number 564-5477

630 GARDEN STREET
POST OFFICE BOX 1990
SANTA BARBARA, CA 93102-1990

April 12, 1993

Ms. Elizabeth Woodward, Chairperson
Environmental Review Committee
City of Santa Barbara
PO Box 1990
Santa Barbara, CA 93102-1990

SUBJECT: WATERFRONT PARK, HOTEL, AND HOSTEL PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS

Dear Ms. Woodward and Committee Members:

Thank you for the opportunity to respond to the Draft Environmental Impact Report on the Proposed Waterfront Park, Hotel, and Hostel Project prepared by Interface Planning and Counseling Corporation for the City of Santa Barbara. Comments and questions are organized under headings which correlate with the EIR Table of Contents and are listed by the page number on which the text in question is found.

SUMMARY TABLE
(Page x, Section 1.0)

8-1 The impermeable surfaces of the hostel assumably include the building, the hardscaped courtyard, and the parking lot. If so, the % of impermeable surfaces would be significantly larger.

(Page xii)

8-2 Public Works staff submitted development plans for the proposed extension of Garden Street to the City of Santa Barbara Planning Division for Environmental Review on February 10, 1993. The plans indicate that Garden Street will be extended across the railroad tracks and along the Westerly edge of the proposed Park site to intersect Cabrillo Boulevard at Santa Barbara Street. Santa Barbara Street will be closed on the North side of the railroad tracks. The street extension would result in minor modifications to the conceptual Park plan including the loss of several parking spaces. However, a net increase of at least 20 parking spaces would be achieved through a redesign and enlargement of the existing Santa Barbara Street parking lot. This net increase in parking spaces would offset the Park's estimated parking shortfall of 18 parking spaces and would

8-2 cont. eliminate the potential for long-term parking impacts. Therefore, the Summary table should be revised to reflect that a significant short-term impact is expected but would be mitigated by the Garden Street extension in the long-term.

(Page xxi)

8-3 Operators of the hostel should be responsible for monitoring the activities of visitors within the canopy of the Moreton Bay Fig Tree <u>only within the area of the Youth Hostel site.</u>

PROJECT DESCRIPTION

(Page 1)

8-4 RDA owns triangle (portion 33-010-07). Please revise text. (Shown correctly on V-2, p. 24.)

(Page 6)

8-5 Park closes at 10:00 pm with permit only; all other times at 1/2 hour after sunset, not 10:00 pm. Application did not make this distinction.

(Page 8, Table III-3)

8-6 The "Hotel Site Totals" amount is incorrect. Please refer to project application site statistics Pages 4 and 5.

(Page 11, Section 2.1)

8-7 The third floor does not provide a *terrace*. Many of the second and third floor rooms do have exterior balconies, as shown.

(Page 11)

8-8 Please revise last paragraph to read ..."An additional <u>100</u> parking spaces...". According to the Traffic, Circulation and Parking section of the EIR, "an agreement which guarantees the availability of up to 100 spaces of surplus parking at the Red Lion Resort shall be entered into as parking mitigation prior to issuance of Certificate of Occupancy". See page 107.

(Page 12, Section 2.3)

8-9 Pedestrian access to enter and exit the hotel site would be provided at two locations, as required by the City Fire Department.

(Page 14-16)

8-10 Hostel was originally a condition of the Coastal Development Permit. Applicant has proposed to incorporate this condition into the amended Specific Plan. Please revise text accordingly.

(Page 16, Section 1.1)

8-11 Please delete reference to a particular height above flood zone and revise the last sentence as follows: "..compaction requirements and to elevate the new structures of the park and the hotel above the 100-year..."

8-12 The hotel structure does not require imported fill for site elevation. Please revise text.

(Page 17)

8-13 Modification Request: insert language indicating applicant to provide 245 on-site and 100 off-site parking spaces. Off-site parking spaces will be provided either through an agreement with the Red Lion for shared parking or by the provision of a new off-site parking lot. Please see project application.

LAND USE CONSIDERATIONS

(Page 22, B. Development Trends, line 8)

8-14 Development plans for the extension of Garden Street were submitted to the City of Santa Barbara Planning Division for Environmental Review on February 10, 1992.

(Page 25, Section 1.1)

8-15 Consistency with Charter Section 1507 could be made by reducing these environmental impacts below environmental thresholds of significance or by making a statement of over-riding considerations.

(Page 34, Section 2.3.2)

8-16 Development of the proposed park and hotel would include the removal of 98 existing trees/shrubs, the majority of which are diseased or stressed and must be removed in accordance with the tree management plan submitted by Bill Spiewak. 97 of the trees to be removed are within the parkland; 1 of the trees is within the hotel site. The 441 trees new trees will be planted on the Park site. Please refer to Project Application, Attachment 14.

(Page 36, Section 2.3.5, first sentence)

8-17 Please remove reference to "two feet". All new structures will be constructed to elevate finished floor levels above the surface water elevation of the 100-year flood plain. Please note that the subterranean level will not be elevated above the flood plain, however, the elevation of the driveway into the structure is above the 100-year flood plain which will prevent flooding of the parking garage.

(Page 39)

8-18 Circulation Element, last paragraph

8-19 The Hotel will provide 245 spaces <u>and</u> comply with one of two options to provide an additional 100 parking spaces off-site, therefore, the text should be revised to indicate that the Hotel will provide sufficient parking to meet demand.

(Page 48)

8-20 Please revise zoning parking requirement of 591 to 519 (see page 17).

SPECIFIC PLAN

(Page 55)

8-21 Add word NOT to first paragraph..."if Parcel B is <u>not</u> acquired,...".

(Page 55, Section 7.0)

8-22 The Parker Family Trust would like to point out that the maximum area allowed to be developed on parcels B and C is *3.4 acres with the off-site satisfaction of the hostel requirement*, as has been proposed herein.

(Page 55)

8-23 Consistency lacking: "75-bed hostel" language to be incorporated into amended Specific Plan--EIR says "potentially consistent"; "hotel use" also to be incorporated into amended Specific Plan--EIR says "potentially inconsistent. Also see discussion on Salsipuedes Street setback (p. 57).

(Page 56, 2. Parking)

8-24 ..."hotel component is potentially inconsistent...". Hotel is not inconsistent with provision of 245 parking spaces on-site and 100 parking spaces off-site.

(Page 57)

8-25 Is the second paragraph on this page misplaced?

(Page 57)

8-26 Agency staff discussed with design landscape architect, George Girvin, the SP language which says "Landscaping shall be drought tolerant". According to Mr. Girvin a majority of the proposed vegetation is drought tolerant including the turf. Please note that drought tolerant species are not required by ordinance anymore and the project will not exceed the environmental threshold for water use.

8-27 Two options for achieving consistency with the Specific Plan:

1. Revise SP to read "Drought tolerant landscaping is recommended"; or

2. Determine that the proposed vegetation substantially conforms to the intent of the existing language.

(Page 57, Section B.1.(b))

8-28 The potentially inconsistent setback from Salsipuedes Street has been asked for in order to maximize contiguous parklands west of the hotel site.

(Page 63)

8-29 Total additional area proposed to be included in Specific Plan is 2.677 acres (2.454 City-owned, 0.223 Southern Pacific owned).

(Page 69, Section 11.0)

8-30 The report states that the proposed Salsipuedes extension would not be a "*significant trip reducer for the lower Milpas area. Slight trip reduction will occur, but only enough to mitigate project impacts.*" Yet on Page 95, Section 2.5.3, the report states that "*approximately 200 Milpas Street peak hour through trips would be diverted to Salsipuedes*". Please explain how one trip through an impacted intersection is considered a significant impact but that a 200 trip reduction at an impacted intersection, which is in excess of the total Peak hour trips expected to be generated by the Park/Hotel project, would be considered only a "slight reduction".

TRAFFIC, CIRCULATION, PARKING

(Page 77, last sentence)

8-31 Note that an application for the extension of Garden Street has been submitted.

(Page 78, Section 2.1, 4th sentence)

8-32 The hotel requires no importation of fill material.

(Page 79)

8-33 Project Trip Generation. Please provide technical appendices.

(Page 80)

8-34 • Please discuss methodology for deriving trips associated with the Carousel.

8-35 • Identify the peak hour of generator for hotel, park, and hostel. Park peak hour could be any hour between 12:00 and 5:00. If a specific hour is not identified how can an assumption be made that the peak hour of the park will coincide with the peak hour of the hotel? If peak hours do not coincide, Peak Hour Trips for the three different proposed uses may not be added together.

8-36 • Trip generation methodology appears to be flawed and should be revised as follows: 104 persons entering or leaving area in highest hour, @ 3.4 persons per vehicle, results in 31 vehicles entering or leaving the park (15 in, 16 out) in the highest hour.

8-37 The EIR proposes that 104 persons entering or leaving the area in the highest hour, @ 3.4 persons per vehicle, results in 62 vehicles entering or leaving park (31 in, 31 out) in the highest hour. However, 62 vehicle trips (x) 3.4 persons = 211 persons entering or leaving area.

8-38 • Last sentence of Section 2.2.1 not consistent with Table VIA-2.

(Page 80, Section 2.2.2)

8-39 The proposed hostel site was a gas station and historically generated 340 average daily trips, or 39 p.m. peak hour trips. Please refer to Hostel Project Application, Associated Transportation Engineers Traffic and Parking Study, Page 3. Credit must be given for trips associated with the gas station.

(Page 85)

8-40 Nine (9) parking spaces, not fifteen (15), exist along the Carpinteria Street frontage and will be replaced. Please revise. Also please see discussion on page 10 of the EIR where it is noted that nine spaces are currently located at the pump house.

8-41 Omni-Means calculated parking demand to be 72 parking spaces. Adding the 9 spaces which must be replaced brings the net demand to 81 spaces. Proposed are 63 spaces which leaves an 18 space deficit. Please note, however, that this 18 space deficit is expected to occur only during summer weekends when the existing City parking lots (Santa Barbara Street and Chase Palm Park) are generally filled to capacity and only until the proposed Garden Street extension is complete.

8-42 Based on the information that the extension of Garden Street will allow the City to provide additional parking spaces sufficient to meet Park parking demand in the long term, we will respectfully request that the Class I parking impacts expected to occur during summer weekends in the short-term be given overriding considerations.

(Page 86, paragraph 1, last sentence)

8-43 A parking improvement plan is available. Public Works staff submitted development plans for the proposed extension of Garden Street to the City of Santa Barbara Planning Division for Environmental Review on February 10, 1993. The plans indicate that Garden Street will be extended across the railroad tracks and along the Westerly edge of the proposed Park site to intersect Cabrillo

8-43 cont. Boulevard at Santa Barbara Street. Santa Barbara Street will be closed on the North side of the railroad tracks. The street extension would result in minor modifications to the conceptual Park plan including the loss of several parking spaces. However, a net increase of at least 20 parking spaces would be achieved through a redesign and enlargement of the existing Santa Barbara Street parking lot. This net increase in parking spaces would offset the Park's estimated parking shortfall of 18 parking spaces and would eliminate the potential for long-term parking impacts.

8-44 • It is stated that the proposed parking would not meet the parking demand for the park (also in Summary Chart, xii). However, throughout the Land Use Considerations section of the EIR, it is stated that sufficient off-street parking is provided to meet parking demand for the park (pp. 43, 46, 53, 56). Please revise for consistency.

(Page 107, Section 3.3, second sentence)

8-45 Please see comments above related to long term parking improvements expected to coincide with the Garden Street extension (xii).

(Page 107, Section 3.1)

8-46 Excess construction employee parking could also be accommodated in the pony lot which has sufficient parking available during the week.

(Page 110)

8-47 Please revise last paragraph: Long-term parking deficit would be Class II because park parking demand would be met with the increase in parking spaces provided at the time the Garden Street extension is complete. Again, see comment xii.

AIR QUALITY

(Page 122)

8-48 • Credit should be given for reduction in emissions going from gas station use to Youth Hostel.

8-49 • Credit should be given for emissions resulting from existing traffic to/from the Park/Hotel Site.

8-50 • Additional comments on the Air Quality section will be submitted prior to April 26, 1993.

(Page 140, Section 1.1.1)

8-51 The park facilities would included a performance venue adjacent to the hotel, the pavilion. Please refer to Appendix E - Acoustical Analysis Report, Page E-28. Maximum sound levels will not be permitted to exceed 80dB at the rear of the audience area, per the park rules and regulations.

NOISE

(Page 145)

8-52 Acoustic barrier to mitigate railroad noise in park will be provided by a wall which is at least seven feet above finished grade in areas easily accessible to park patrons.

(Page 145, Section 2.1.1)

8-53 The existing railroad noise would not result in a potentially significant adverse noise impact within the hotel's guest rooms according to Appendix E - Acoustical Analysis Report, Page E-29 of the EIR which states:

"No mitigation of exterior railroad noise would be required in exterior areas of the hotel since the courtyard will be shielded from the tracks by the northerly wing of the building...interior noise requirement...can be readily achieved through the use of closed, well sealed, acoustically upgraded window assemblies. Fixed windows would not be necessary."

VISUAL RESOURCES

(Page 165, Section 2.1.2)

8-54 *"Loss of open space...development of the proposed 150 room hotel would convert 3 acres of the site's approximate 13 acres of existing open space to hotel/motel use...therefore, the loss of three acres of previously disturbed open space which would be attributed to the proposed hotel... significant adverse visual impact on existing Riviera and mountain views observed from Cabrillo Boulevard..."*

The Parker Family Trust questions these findings of the EIR, especially in light of equal application of visual aesthetic standards. It is important to know that the three acre site in question had been significantly developed since 1922 with the construction of Puritan Ice Company plant, a structure which was 370 feet long facing Cabrillo Boulevard, and up to 120 feet deep. The structure reached a height of 46 feet, and visually dominated parcel B (please refer to Interface Final EIR - Fiesta Park, Plate 4). At the request of the City of Santa Barbara Building Department, and in light of the joint venture project, the Ice House was removed in 1991 (less than one year prior to submittal of this project application).

8-54 cont. It is therefore troublesome to read throughout the visual resource analysis of the proposed hotel that its development would result in "*significant adverse visual impact on existing Riviera and mountain views observed from Cabrillo Boulevard*" Please review the text of the Visual Resource Analysis of the hostel, Page 177, Section 2.2.2, which states "*the site has been utilized for commercial use since the 1930's and the City's General Plan designates the site for continued commercial use in the future. Presently, the open space condition that exists is considered to be temporary condition resulting from the removal of the previous business. Therefore, the temporary open space character of the site is not considered a visual resource and significant adverse aesthetic impacts associated with the redevelopment of this site would not occur.*" (Emphasis and underlining added).

8-55 Parcel B has been significantly developed since 1922; the hostel site has been significantly developed since "the 1930's". The Ice House was demolished in 1991; the gas station on the hostel site was demolished in 1989. If the hostel site constitutes a temporary open space condition, then the proposed hotel site is even more so and should be fairly analyzed as such, both in terms of open space and visual impacts.

BIOLOGICAL RESOURCES

(Page 189 Section 3.3.2)

8-56 Hostel operators would have no enforcement authority over individuals within the canopy of the Moreton Bay Fig Tree except on the hostel site. Literature describing the importance of the tree and requesting that visitors abstain from behavior potentially harmful to the tree could be distributed to hostel guests upon arrival or posted in a conspicuous place on the hostel site.

HAZARDOUS MATERIALS/WASTES

(Page 204)

8-57 Dewatering of the subterranean parking garage on the Hotel site is proposed, however, this does not constitute groundwater extraction

RECREATION

(Page 211, 1st line)

8-58 The Required Elements of Park Design were derived from public input generated at the July 20, 1990 planning charette, from meetings with community groups, and from discussion with City Parks and Recreation staff. Once Mr. Girvin's design team was selected, the team met with City Parks and Recreation Commission and staff, arts groups, and close to 40 different community groups to obtain input prior to finalizing the submitted conceptual plan.

(Paragraph 2)

8-59 Please revise "Oval" to "Plaza".

(Paragraph 3, Section 1.1)

8-60 As proposed, the Pump House could be available for various youth activities, however, the details of games and activities provided are much too specific at this time. Recreation staff has outlined some ideas for programming (Attachment 24, Project Application) but has not planned to the level, for example, where we can say croquet equipment will be provided.

(Paragraph 4)

8-61 The Project Application does not propose a "rose exhibition garden" or "knot and herb gardens" although at the time detailed planting plans are prepared these may be included.

8-62 Please note that an artist is part of the Park Design Team and he will be responsible for working with local artists to incorporate art into the project in a variety of ways. However, it has not been specifically proposed to include a Sculpture Garden at this time.

ALTERNATIVES

(Page 235, Section 2.0)

The alternative project design described in the text calls for a "*125 suite rooms*", down from the proposed 150. It goes on the state that the "redesigned suite-type hotel would be a maximum of two stories".

8-63 • Is a distinction being made between a 150 room luxury hotel and a 125 suite room hotel? As proposed, some of the 150 rooms will be suite rooms. If it is intended that the alternative project would not be a luxury hotel, suite rooms or not, the resulting hotel would compete more directly with existing accommodations in the East and West Beach coastal zone.

8-64 • The 150 room luxury hotel has 49 rooms on the third floor; removing the third floor would more likely result in a 100 room hotel (or less if a "suite-room hotel") which would not be economically viable.

8-65 • A two-story hotel on the site would necessitate the development of the additional 0.4 acre area permitted under the Coastal Development Permit for the site. Under the 150 room luxury hotel proposal, the Parker Family Trust has chosen to forego the development of the 0.4 acre parcel, and to give the title of this vacant developable area to the City for additional parkland. By agreement with the City, if the proposed third story element is not allowed, the Trust can develop the entire 3.4 acre commercial parcel as permitted, and will dedicate 4.543 acres instead of 4.943 acres of the land to the City.

(Page 244, Section 4.3.1)

8-66 Please incorporate a discussion of Measure E relative to the development of the alternative hostel sites.

(Page 245, Section 5.0)

8-67 It should be noted that the *Plazuela Concept* would not be unlike previously denied proposals in that the retail and restaurant activities would have to be linear in nature, fronting Cabrillo Boulevard, to have any change to be financeable and economically viable; additionally, it would have to generate significant traffic if it were to be successful. These project features, inherent in any successful retail/restaurant coastal project - whether "*Latin Culture and*

8-67 cont. *Heritage*" theme or otherwise - would be in conflict with the wishes of the community as seen in the previous denials for similar proposals on this site.

MISCELLANEOUS

8-68 (D-6) Letter from Mr. Michael Caccese, 12/16/92, was prepared prior to the confirmation of the potential impacts of chlorine on marine environment. Therefore the letter erroneously states that Wilds will be drained into Laguna Creek. Only the Lagoon will be discharged through Laguna Creek because Lagoon water will not be disinfected. The Wilds would be drained to El Estero for treatment, then discharged to avoid adverse impacts of disinfectant on ocean environment. This is correctly explained on page 9.

As noted above, further comments will be submitted by April 26. If you have any questions or comments please contact Teri Harmon Malinowski at 564-5461 or John Cahill at (818) 991-5659.

Sincerely,

Teri H Malinowski

Teri H. Malinowski
Redevelopment Planner

John E Cahill

John Cahill
Parker Family Trust

[th\pk\parkeir]

Response To Comment Letter 8

8-1 Comment acknowledged; please see revised text

8-2 Comment acknowledged; no response necessary.

8-3 Comment acknowledged; please see revised text.

8-4 Comment acknowledged. However, the Waterfront Park and Hotel Project Application Package as well as the Park and Hotel's Site Plan prepared by Penfield and Smith state that the SPTC currently owns APN 33-010-07. Therefore, the proposed Site Plan should be revised to state that the City of Santa Barbara Redevelopment Agency currently owns APN 33-010-07. The text has been revised to illustrate the correct ownership of APN 33-010-07.

8-5 Comment acknowledged; please see revised text.

8-6 Comment acknowledged; please see revised text.

8-7 Comment acknowledged; please see revised text.

8-8 Comment acknowledged; please see revised text.

8-9 Comment acknowledged; please see revised text.

8-10 Comment acknowledged; please see revised text.

8-11 Comment acknowledged; please see revised text.

8-12 Comment acknowledged; please see revised text.

8-13 Comment acknowledged; please see revised text.

8-14 Comment acknowledged; please see revised text.

8-15 The City Council finding associated with the project's consistency with Charter Section 1507 will either indicate that the project is consistent with the section or it is not. "Overriding Considerations" are findings associated with the California Environmental Quality Act, in connection with unavoidable environmental effects, not policy consistency or inconsistency.

8-16 Comment acknowledged; no response necessary.

8-17 Comment acknowledged; please see revised text.

8-18 Comment acknowledged; please see revised text.

8-19 Comment acknowledged; please see revised text.

8-20 Comment acknowledged; please see revised text.

8-21 Comment acknowledged; please see revised text.

8-22 Comment acknowledged; no response necessary.

8-23 Comment acknowledged; please see revised text.

8-24 Comment acknowledged; please see revised text.

8-25 Comment acknowledged; please see revised text.

8-26 Comment acknowledged; no response necessary.

8-27 Comment acknowledged; please see revised text.

8-28 Comment acknowledged; please see revised text.

8-29 Comment acknowledged; please see revised text.

8-30 Comment acknowledged; please see revised text.

8-31 Comment acknowledged; please see revised text.

8-32 Comment acknowledged; please see revised text.

8-33 As is noted in the text, the technical appendices are on file and are available for review at the City Community Development Department at 630 Garden Street. Due to the length of the traffic technical appendices and the very limited number of people interested in reviewing them, City staff and Interface decided to have them on file rather than include them in the EIR. This decision saves an abundance of paper and money in printing costs.

8-34 Comment acknowledged; please see revised text.

8-35 The trip numbers used in the EIR are based on traffic generation during common peak hours on Friday and Sunday.

8-36 Please see Response to Comment 1-2.

8-37 Please see Response to Comment 1-2.

8-38 Comment acknowledged; please see revised text. Also see Response to Comment 6-30.

8-39 Although the proposed hostel site did include a gas station, the existing peak hour intersection volume counts were conducted after the gas station no longer existed. Therefore, the "credit" for the gas station trips is already accounted for in the existing volumes. As the existing volumes used for this report form the foundation for the future base scenarios, no adjustments to the future volumes are necessary.

8-40 Comment acknowledged; please see revised text.

8-41 Comment acknowledged; please see revised text.

8-42 Comment acknowledged; please see revised text.

8-43 Please see response to comment 8-42.

8-44 Comment acknowledged; please see revised text.

8-45 Please see response to comment 8-42.

8-46 Comment acknowledged; please see revised text.

8-47 Please see response to comment 8-42.

8-48 Comment acknowledged; however, the youth hostel site is currently vacant, and there are no existing trips associated with the site. The service station which was previously located at this site was demolished over three years ago, and it is therefore not appropriate to give a credit to the current project for these historic trips. Consequently, air quality emissions have not been "credited" with respect to historic vehicle emissions associated with historic gas station site activities.

8-49 Comment acknowledged; the long term vehicle emissions associated with the park and hotel site have been re-evaluated to account for a credit for existing trips on the site. See revised Table VIB-3.

8-50 Comment acknowledged; no response necessary.

8-51 Comment acknowledged; please see revised text.

8-52 Comment acknowledged. However, the proposed Site Plan illustrates the creation of berms along the southern side of the acoustic wall, which would result in portions of the wall being under 7 feet high relative to the park site. Therefore, the mitigation measure ensuring that the acoustic wall is at least 7 feet above the finished grade on the park side of the wall is required.

8-53 Comment acknowledged. Because the project information provided by the applicant did not state that the proposed hotel would utilize acoustically upgraded window assemblies to restrict train noise, the potential for the hotel rooms to be exposed to sound levels exceeding the noise thresholds would exist. Therefore, a potentially significant adverse noise impact must be assigned to the proposed project in order to ensure that hotel guests are not exposed to levels of noise exceeding applicable thresholds (as required by State CEQA Guidelines).

8-54 Comment acknowledged. However, the building footprint of the Puritan Ice Company Plant only encompassed approximately 0.72 acres of the 13 acre site, which has been predominately open space over the last 50 years. Conversely, the majority of the 0.55 acre hostel site has been utilized for commercial development which has limited the amount of open space visible on the site. Therefore, the majority of previous park and hotel site views have been comprised of large amounts of open space, while the majority of previous hostel site views have depicted minimal amounts of open space. In addition, assessing whether or not the open space of a project site is considered a

significant aesthetic resource is relative to the overall size of the site's open space and whether the open space is intended to be preserved as such. Because the hostel site is only 0.55 acres and is envisioned for hotel and related commerce in the City of Santa Barbara's General Plan, the hostel site's open space is not considered a significant aesthetic resource.

As for significant adverse visual impacts associated with the development of the proposed hotel, the Loss of Open Space discussion contained within the Aesthetic Resources section of this EIR clearly states "the loss of three acres of previously disturbed open space which would be attributed to the development of the proposed hotel would not result in a significant adverse aesthetic impact". With regard to the development of the proposed hotel resulting in a significant adverse visual impact on existing Riviera and mountain views observed from Cabrillo Boulevard and Chase Palm Park, the obstruction of existing views by the proposed hotel would result regardless of how the site's open space is classified. In addition, comparing the size of the proposed two and three story hotel (144,072 gross square feet) to the size of the predominately one-story and partial two-story Puritan Ice Company Plant (31,553 gross square feet) illustrates why the proposed hotel would block more views than the previous Puritan Ice Company Plant.

8-55 Comment acknowledged; please see response to comment 8-54.

8-56 The text has been modified to place the responsibility of monitoring the Moreton Bay Fig Tree with the City of Santa Barbara Park Department, rather than with the operators of the hostel. The mitigation measure suggesting the provision of informational literature regarding the significance of the tree has also been added to the text.

8-57 Comment acknowledged; please see revised text.

8-58 Comment acknowledged; please see revised text.

8-59 Comment acknowledged; please see revised text.

8-60 Comment acknowledged; please see revised text.

8-61 Comment acknowledged; please see revised text.

8-62 Comment acknowledged; please see revised text.

8-63 Comment acknowledged; please see revised text.

8-64 Comment acknowledged; please see revised text.

8-65 Comment acknowledged; please see revised text.

8-66 Comment acknowledged; please see revised text.

8-67 Comment acknowledged; please see revised text.

8-68 Comment acknowledged; no response necessary because the information is already contained in the EIR.

Comment Letter 9

April 26, 1993

RECEIVED
APR 26 1993
CITY OF SANTA BARBARA
PLANNING DIVISION

Ms. Elizabeth Woodward, Chairperson
Environmental Review Committee
City of Santa Barbara
PO Box 1990
Santa Barbara, CA 93102-1990

SUBJECT: WATERFRONT PARK, HOTEL, AND HOSTEL PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS

Dear Ms. Woodward and Committee Members:

This letter is to provide comments from Redevelopment Agency staff and the Parker Family Trust supplemental to our April 12 letter.

PROJECT DESCRIPTION

9-1 Site planning of the proposed project evolved as a result of a continuing dialogue with the community. The initial proposal made by Parker Family Trust as shown at the Community Environmental Council hosted seminar in December, 1989 was for a "rear-loaded" commercial project encompassing 3.4 acres of the overall site. The commercial components of the project would occupy two identical structures, each 550 ' long by 125' deep. One and two story Spanish-colonial styled buildings would sit atop a subterranean parking level sufficient to supply the extensive parking required by restaurant and retail uses. The project would create approximately 5 acres of contiguous open space between Cabrillo Boulevard and the commercial structure.

9-2 As feedback from the community came in the early months of 1990, the initial proposal was rejected for two reasons:

1. While the open space was contiguous and a vast improvement over the open space proposed in Fiesta Park, it was still viewed, by many, as a "front yard" for the commercial project, and therefore not acceptable.

2. The retail\restaurant component of the project was, by design, linear in nature. The net effect was of a commercial statement which visually dominated the entire Cabrillo Boulevard frontage of the site; not unlike earlier "Fiesta Park" proposals which were rejected for that reason.

9-2 cont. Parker Family Trust subsequently prepared, after discussions with City staff, an alternative proposal which addressed these concerns. The direction of the alternative proposal was based on a re-examination of the goal of providing meaningful recreational open space and an appropriate economically viable commercial component of the project. If the City would revisit non-retail\restaurant driven uses, Parker Family Trust would design a project which would compress the commercial footprint to the extreme easterly end of the property, and strive to minimize the Cabrillo Boulevard presence of the commercial component of the overall project, so as to allow for the creation of the maximum amount of meaningful contiguous parklands.

Subsequently, the City Council endorsed this second conceptual plan and has been pursuing this proposed joint development project with the Parker Family Trust. It is the applicants' intention to mitigate potential visual impacts by limiting the commercial development to approximately 20% of the site.

Please include this background information in the EIR text to provide a more complete project description and history.

TRAFFIC, CIRCULATION, PARKING
(Page 79, Section 2.2)

9-3 It is stated that input from Santa Barbara City staff was incorporated in projecting traffic generation of the proposed Park. Please identify which City staff. Parks and Recreation staff, experts in their field and responsible for the operation and programming of 36 City Parks, prepared a Park Programming Matrix to provide anticipated park usage numbers (Attachment 20, Project Application). This programming is based on their experience in management of the City's other parks. According to this Matrix, a maximum of 500 persons are anticipated to use the Park on a given weekend afternoon. This Parks and Recreation Department programming is consistent with the parameters established by Policy 3.7 of the Local Coastal Plan which states that "The City of Santa Barbara shall require selective scheduling of major recreational events at park facilities in the coastal zone in order not to congest the traffic and circulation system in the area".

9-4 Therefore, trip generation assumptions for park use are overstated as are total peak hour trips. Please revise text and related table to show that 50 persons, not 70 persons, are expected to use the Park during the Weekday Peak Hours, and that 500 persons, not 690 persons, are expected to use the Park during the Sunday Peak Hours.

9-4 cont. Total Weekday Peak Hour Park Trips would be 33 (50 persons /2 hours x 1.5 x 0.5 /3.4 x 2 = 11 + 22 (carousel) = 33 trips).

Total Weekend Peak Hour Park Trips would be 78 (500 persons /5 hours x 1.5 x 0.5 /3.4 x 2 = 44 + 34 (carousel) = 78 trips).

9-5 • For consistency, please discuss weekday park use first; weekend park use second.

(Page 85)

9-6 • Parking demand must be revised also and appropriate changes made to related text: 78 peak hour vehicle trips / 2 one-way trips per vehicle x 1.5 (to allow for some overlap of arriving and departing vehicles) = 59 parking spaces.

AIR QUALITY
(Page 122)

9-7 • Air Quality calculations must also be revised to reflect the lower expected trip generation for the park. Methodology outlined by the Air Pollution Control District should be used.

VISUAL RESOURCES

9-8 • New opportunities for ocean and mountain views from within the proposed park site will be created with the development of the proposed Park. These opportunities should be mentioned as beneficial impacts of the proposed park.

(Page 160)

9-9 • Ice house demolished in 1991, not 1990.

ECONOMIC AND FISCAL IMPACTS

9-10 • The EIR discusses economic impacts in and of themselves rather than in relation to economic causes of physical impacts.

Section 15131(a) of the CEQA Guidelines states: "Economic or social effects of a project shall not be treated as significant effects on the environment." Essentially,

only if an economic or social effect in turn causes (negative) physical changes in the environment would the economic or social effect be treated as a significant effect under CEQA. "The focus of the analysis shall be on the physical changes."

9-10 cont. The EIR does not provide an analysis of any physical changes expected to result from the economic effects of the project. Even though the EIR concludes that the "proposed project would have a substantial, beneficial fiscal and economic impact on the community", some discussion should occur to indicate that the potential for physical changes was analyzed relative to economic impacts and no such potential is identified.

ALTERNATIVES
(Page 236, Section 2.0)

- "In addition, the reduced hotel size would experience more difficulty in supporting the hostel."

9-11 The hostel has no direct relationship to the economic viability of the proposed project save its relationship to the size of the commercial site. As has previously been stated, the satisfaction of the hostel requirement allows the Parker Family Trust to commercially develop up to 3.4 acres of the overall site; the balance to be directed to public open space. To review, up to two acres of commercial development are allowed without any hostel requirement being satisfied; but upon the off-site creation of a 75 bed hostel, up to 3.4 acres of the overall site may be commercially developed.

9-12 It is important to note that the hostel is a stand-alone component of the project, and is not supported or subsidized by the project in any way - it is an inducement for commercial site size.

(Page 245, Section 5.0)

- " It should be noted that in order for this project to proceed, the City would need to purchase the property from the applicant."

9-13 Parker Family Trust had previously proposed and been denied for a similar "Plazuela" project - "Fiesta Park" - on a number of occasions. It is a well documented fact that the community made it very clear it does not want to see

9-13 cont. any retail\restaurant projects impacting the Cabrillo Boulevard waterfront, except as a function of State Street - the retail core of the city.

Whether Parker Family Trust, the City, or parties unknown owned the property these facts would seemingly prevail.

SCHOOLS

9-14 • To respond to preliminary comments from the Santa Barbara School District, the applicant expects to mitigate the impact of any new students resulting from the project through School Impact Fees paid at the time building permits are issued. It is important to note that the school district facilities are not currently operating at capacity.

This concludes our comments on the Draft EIR. In addition, please find the attached letter which provides comments on CEQA compliance issues. Thank you again for the opportunity to comment. If you have any questions or comments please contact Teri Harmon Malinowski at 564-5461 or John Cahill at (818) 991-5659.

Sincerely,

Teri H. Malinowski
Redevelopment Planner

John Cahill
Parker Family Trust

[th\pk\parkeir2]

Response to Comment Letter 9

9-1 Comment acknowledged; this comment is explanatory, therefore, no response has been provided or is necessary.

9-2 Comment acknowledged; please see revised text.

9-3 The anticipated park usage figures of 690 persons on weekends and 70 persons on weekdays are consistent with figures established by the Santa Barbara Planning Division. The figures use Parks and Recreation's Matrix. In addition, use of the Great Meadow for up to 500 people is possible. Other park patrons could use the remaining portions of the park for other activities (i.e., walking, picnicking, playing in the Wilds, etc., at the same time).

9-4 Please see response to comment 9-3.

9-5 Please see response to comment 9-3.

9-6 Please see response to comment 9-3.

9-7 Comment acknowledged. However, in re-examining the park trip generation figures, Omni-Means (the EIR traffic consultant) concluded that no revision of the existing project trip quantities would be warranted. Therefore, the existing air quality emissions data for park trips has not been changed.

9-8 Comment acknowledged. Although new opportunities for ocean and mountain views from within the proposed park would result, these new viewing opportunities would be offset by the view blockage associated with the proposed hotel. Conversely, when viewing the proposed park and hotel as a single entity a net decrease in overall viewing opportunities would result.

9-9 Comment acknowledged; please see revised text.

9-10 Comment acknowledged; please see revised text. As described in the Economic and Fiscal Impacts Section of the DEIR, the proposed project is expected to have a positive economic impact on the existing blighted central Waterfront Area. Ten acres of the 13 acre site is proposed as Waterfront Park with the remaining three acres developed as a luxury hotel. The potential for physical change to the environment resulting from the economic effects of the hotel, development were analyzed and no negative long-term physical impacts were identified. Regarding short-term impacts, every effort will be made during the construction period to mitigate detrimental effects such as dirt and dust pollution, as outlined in the DEIR.

With regard to any physical changes resulting from the economic effects of the project, the following response is provided. The City of Santa Barbara Planning Division staff and Environmental Review Committee felt it was appropriate to include an economic and fiscal impact analysis in the EIR in order to respond to questions raised during the EIR scoping process. Section 15131 of the State CEQA Guidelines states "economic or social information may be included in an EIR or may be presented in whatever form the agency desires". Consistent with the CEQA Guidelines, the economic and fiscal effects discussed are not specified as significant effects on the

environment. In addition, no physical changes on the environment as a result of the economic changes discussed in Section VIII are anticipated. This statement has been included in the section; please see revised text.

9-11 Comment acknowledged; the statement has been stricken from the referenced portion of the text. See revised discussion under Hostel Locations which clarifies the hostel/project relationship.

9-12 Comment acknowledged; no response necessary.

9-13 Comment acknowledged; please see revised text.

9-14 Comment acknowledged; please see subsection C. Schools which was added to Section VII. Impacts Found Not to be Significant.

Comment Letter 10

CITY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT

INTEROFFICE MEMORANDUM

RECEIVED

APR 13 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

DATE: April 12, 1993

TO: Jan Hubbell, Project Planner

FROM: Marti Schultz, Supervising Engineer M.S

SUBJECT: WATERFRONT PARK/HOTEL/HOSTEL, 325 EAST CABRILLO BOULEVARD, APN 17-010-34, -35, -36, & -42, ENVIRONMENTAL IMPACT REPORT (EIR) REVIEW

10-1 It has not been made clear in the Environmental Impact Report (EIR) where the pedestrian bridges will be built with respect to the footings for the bridges. If the footings were to be constructed in the creek or creek bank, there would be impacts not identified. If the footings are constructed far enough from the creek bank there probably will not be any impacts to the creek. If there is a need to widen Cabrillo Boulevard, there may be a need to extend the culverts going underCabrillo Boulevard and any construction within the creek will probably have an impact.

10-2 It has been identified that the site drainage will be basically brought to Laguna Creek, which is an appropriate natural drainage course. The concern is that the flow from Laguna Creek to the ocean is not consistent, and the question is, where will the water pond? This is a concern for strom run-off from irrigation watering, as reclaimed water will be used and ponding is not acceptable. Will the water be retained by the pond on the park side of the project or will the ponding increase on the beach opposite the project? Any increase in ponding would seem to be an impact that needs to be evaluated.

10-3 Necessary street widths and parking impacts will be deferred to, reviewed, and commented on by Public Works Transportation and Parking Division Staff.

MS/mlc

cc: Diane Needham, Principal Civil Engineer
Rob Dayton, Senior Transportation Planner

[D:ENGR:MSWATER.MEM]

Response to Comment Letter 10

10-1 According to Mike Caccese of Penfield and Smith who is the project engineer, all of the pedestrian bridge footings will be located outside of the creek or creek bank. The pedestrian bridges proposed are "clear span" bridges in which the footings are located above the top of the creek bank. Therefore, no adverse biological impacts are anticipated with respect to bridge footings.

The proposed project does not include any widening of Cabrillo Boulevard and the project engineer does not foresee a need associated with this project to extend the culverts under Cabrillo Boulevard. Therefore, no adverse impacts to the creek are expected.

10-2 An on-site drainage system that would convey runoff from the site would be developed as part of the proposed project. The drainage system is discussed in Section VII, Drainage. As is discussed in Section III, Project Description, water from the Lagoon and The Wilds creeklets would **not** flow into Laguna Creek. The pedestrian bridge that is proposed between Laguna Creek and the Lagoon would actually serve as a dam and would prohibit Lagoon water from flowing into the creek (refer to Figure III-3). The Lagoon and The Wilds creeklets would serve as a retention basin to store flood waters and to help prevent ponding. According to Mr. Caccese, the Lagoon may actually improve the existing drainage situation because the Laguna Creek pumps that convey water under Cabrillo Boulevard are undersized to accommodate a 100-year flood event. If the storm water in Laguna Creek exceeds the pump's capacity to draw water under Cabrillo and to the ocean, excess storm water could overflow the pedestrian bridge to be stored in the Lagoon. Although storm water could flow from Laguna Creek into the Lagoon, water flow from the Lagoon to Laguna Creek would only occur if the water quality met state standards and if the Lagoon were being flushed. If the water quality was not sufficient to allow drainage into Laguna Creek, then the Lagoon water would be drained to El Estero Wastewater Treatment Plant, located directly north of the park.

According to Mike Caccese, there would be no increase in ponding on the south side of Cabrillo because the flow from Laguna Creek would continue to be controlled by an existing pump station located adjacent to the creek within Chase Palm Park.

10-3 Comment acknowledged; no response necessary.

Comment Letter 11

Waterfront Park/Hotel/Hostel Draft EIR

Oral Comments on the Draft EIR at the Environmental Review Committee meeting of April 16, 1993

These are not, in most cases, full quotations of the comments made; they are summarized minimally with the intent of reducing the length, but not the import, of the statement. Only those people who did not submit written comments have been included here.

Robert Hansen:

11-1 This has disturbed me for quite a long time because, in 1991, there was public input and I was trying to weigh where the public input went. In 1991, we asked you to please ask the community to put public input into the Waterfront Park. Well, in 1993, we're thanking the City Hall and Fess Parker for this park. I don't see where the public input is coming in.

11-2 Another thing that's really upsetting me is that it's nice to have justice and it just doesn't feel like there's going to be any justice. I'd like to clarify if the youth center is really part of this whole project. Just yesterday, the Youth Task Force met, which has been trying to work with our youth in the community. I went to a couple of their meetings and they had mentioned that they had put some input in, but it was kind of pushed down. I thought at one time they asked like skateboard or, maybe, miniature golf, or something like that.

11-3 If there was a teen center, I would think it would be nice to have a nice light crossing there across from Carpenteria, so that our teens and youth can go across to this teen center and come back safely instead of going down a couple blocks on each side to either Santa Barbara Street or Salsipuedes.

11-4 Another thing I read in the report is possibly having a shuttle that would be in lieu of fees to bring the community down to this project because of the air pollution. Is this true that that's trying to be happening or is that another kind of myth?

11-5 Another thing not being mentioned here is there is a container that holds gases over at the waste plant and they have some poisonous gases over there. I would like you to look into that and see what the earthquake prevention thing of the building that were it to break down or something like that would be very important.

11-6 It just seems like the same old, same old. They spent a quarter of a million dollars to get rid of youth and stuff in front of King Carlos and I don't really think you're going to bring youth down to this facility. It's Fess Parker's monument

11-6 cont. to him. I'm kind of mad that this always happens in the community, that there are people that come to our community that spend $200 a day and you respect them more than we respect the community that's only going to spend a few dollars a day, but they're here all the time.

Tomi Sollen:

11-7 I've got a little statement here by Rosemary White who's very much concerned about the park problem. Her suggestions are that children will tend to play in all water areas. Will the water be safe? And best to keep landscape open, not dense, to discourage loitering. And she would like plenty of benches and maybe tables.

11-8 And what is the elevation of the sunken great meadow? Will it flood in storms and be under water as Dwight Murphy Field is often under water?

11-9 She said, in regard to the building, she thought it was a good concept and then she says to keep the play ground equipment naturalistic as possible.

11-10 Now, I have a few suggestions for myself. I wondered if, where the ice house was, if the soil might be contaminated. They used ammonia. Would you check on that?

11-11 And then I think the park is not really designed for families with children. It's got too many trees and I worry about being under so many trees. It is cold in that area and I think it should be more open space. One of the suggestions I have is that you make a big fountain which can be cleaned, you know how dirty water areas get, and around this area put some sculptured pieces like they have at La Arcada so children climb all over those little pieces they have; children really like to do that.

11-12 And the other suggestion I have is that there may be a viewing platform of the trains from the backside. And I think this is just a little too dense, so I hope you will consider keeping it more open so that we don't have too many people loitering under there.

Noris Goss:

I speak simply as a resident and a citizen of Santa Barbara. There are three points I would like to make.

11-13 First of all, I guess that I'm rather amazed that there has not been a greater public outcry against the whole concept of this hotel when it was specifically stated just a few years earlier that we would not have these additional rooms built when

11-13 cont. the size of the Red Lion was kept at the size it was. I feel like there probably will be greater public outcries as more people are reminded of that.

The second thing is, as a citizen, I have often been struck with the lack of other services at that end of the beach, and so it's disappointed me very much that the development of that property has gone toward more hotel rooms, particularly hearing the woman speak of how the occupancy in Santa Barbara is down
11-14 anyway. It seems that, on the one hand, we have more hotel rooms than we need and, on the other hand, there really is an absence of other kinds of services at that end of the beach where the East Beach area draws a lot of tourists and there is very little in the way of food accommodation and so forth at that end and I would so much prefer to see something developed there that was to provide those services.

The third thing that concerns me is the whole concept of the youth hostel. Now I say that because of the fact that I can understand how the term youth hostel is appealing and that it seems to address the lower end of the tourist market and so forth, but we are in a society that is not accustomed to the youth hostel concept like they are in Europe. I feel that what it's creating here is just inexpensive rooms with the availability of renting just a bed within a room, I think that is an opportunity for the concept to be abused. Particularly,
11-15 again, hearing the woman say that there are, and I know this from inquiries also, that there are hotel rooms, motel rooms in the area that are only in the $50-ish range and I think most young people coming into town would probably not be alone. They would be two or three together which would really result in their being able to use those rooms at the same cost that they would a hostel room. And as I said, I just feel as a citizen and a mother that the concept of a youth hostel down there is an opportunity for abuse and I question the validity of that even though I recognize the name and the concept has a certain amount of public appeal.

Steve Wiley, Assistant City Attorney:

I don't want to belabor this because commenting on planning issues, non-CEQA issues, is not necessary at this hearing. There will be plenty of opportunities for such discussions later, but
11-16 since this is an opportunity in a public hearing to get some historic accuracy, I was asked to point out a couple of things with respect to the 1981 conditions imposed on the Red Lion.

With respect to the youth hostel, the conditions actually had three different alternatives available to the developer of Parcel A, to the developer of the Red Lion. Those alternatives
11-17 were, within two years either build a 75-bed hostel on site or build a 75-bed hostel offsite or, most importantly, three, dedicate 18,000 square feet onsite and post a bond for the

preparation of plans and the payment of engineering fees in connection with a hostel. This third one was bit odd to me. It wasn't clear, number one, who actually builds the hostel; it doesn't say. Who operates the hostel, who owns it, it doesn't say. The third alternative was the one that the developer actually selected. They had the ability to change their mind within the two year period, but there was a dedication recorded against Parcel B for an 18,000 square foot hostel. A bond was posted for the fees and for the engineering and that complied with the condition.

11-17 cont.

Another point, in terms of historical accuracy, it might be important for everyone to remember or to realize, was that the dedication of the open space which was involved in the development of the Red Lion was contingent upon the development of Parcels B and C and that, of course, is the reason why there isn't any open space on Parcels B and C today, because no portion of Parcels B and C have been developed. Theoretically, if Parcels B and C are not developed at any point in the future, there will not be that open space. It actually was, unlike the front of the Red Lion, to be dedicated to the City, either in fee or as an easement, as a City park.

11-18

Finally, to the extent that there is some impression that we are legally bound by the 1981 conditions, I think it needs to be clear that those conditions are planning conditions and I think it's a fundamental assumption of the applicant that we are replanning this area. In other words, 12 years later, what the applicant is saying is, yes, those conditions were imposed. There was a prohibition of further hotel development. There was permission for mixed retail, commercial, some residential development. But what I believe the applicant's position is, what's appropriate for the 90s for those 13 acres, including the City's property? From an urban planning perspective, are we going to stick to something that is now 12 years old or do we relook at that property and plan for the 90s? Whether you accept that or not, I'm not really suggesting the merits of replanning, but that's the fundamental assumption of the applicant.

11-19

Tom Gerig, Member, ERC:

11-20 Page 74 - Where were the traffic counts done in August 1992?

There are a number of areas in the EIR where there are comparisons made to other facilities of a similar type. I think it's maybe important in those cases to indicate a little bit more about the nature of the things they are being compared to. For example, There's a comparison to a hostel in Santa Monica, but it's never made clear where it's located, how many beds it has and so forth. I think that has some relevancy to whether the comparison is fair or not.

11-21

11-22 With regard to the comment a few moments ago about the presence of ammonia in the soil, I'm going to bet that the ammonia was gone 25 years ago. Ammonia is not a material that sticks around very long.

11-23 Page 224: In the economic study, among the numbers that go down to the sixth significant figure and so forth, is this adjustment for feasibility of risk and the project proposed gets a 1.0 and the reduced project gets a 0.7. Now does a 1.0 mean that there's a 100 percent chance that this is going to be successful as proposed? Is that the notion? I don't really care what the factor is along as there's some justification for it, or if it's "engineering judgement," even a statement to that effect. Does 1.0 imply that there's no speculation involved or is this a relative number ranking the extent of the speculation? Where did the 0.7 come from? The casual reader is going to whip through this ignoring all the numbers, come down to the bottom position and see 12 [million] versus 7 [million] and make a quick decision, possibly missing the fact that there's a correction factor in here that makes the difference between the two numbers quite large and that the correction factor may be as speculative as the project.

[jh/park/erc-deir.ph]

Response to Comment Letter 11

11-1 Extensive public input on the Park Plaza Specific Plan and on the Waterfront Park has been solicited and received by the City Community Development Department. More than 100 people participated in the Waterfront Park Planning Workshop that was sponsored by the City Redevelopment Agency and Parker Family Trust on July 21, 1990. One of the conclusions of that workshop was to identify a development approach that would create a maximum amount of contiguous open and usable space, with a minimum amount of development impact. On May 4, 1991, a second workshop was held to plan the proposed park and almost 100 people examined the three proposals for Waterfront Park. The proposed project was created based on the principle ideas discussed at the workshops by members of the City Council, City Boards and Commissions, business and community organizations, the Community Environmental Council, City staff and the general public. There is a "Report on the Waterfront Park Planning Workshop" available at the Community Development Department if the reader is interested in further information.

11-2 Although specific details of the proposed Pump House's uses have not been defined at this time, the Pump House is proposed to be a Recreation Center for all City residents. However, in the future the Recreation Center (Pump House) <u>may</u> be specifically utilized as a Teen Center for local youth. Please see the Recreation section of this EIR for additional information associated with the Recreation Center.

11-3 A non-signalized pedestrian crossing across Cabrillo Boulevard is proposed near the Pump House. Please see Figure III-3, Site Plan, which depicts this crossing.

11-4 The City of Santa Barbara's free shuttle already serves the State Street and Cabrillo Boulevard corridors and therefore it could also serve the proposed project.

11-5 The City of Santa Barbara's El Estero Wastewater Treatment Plant has prepared a Hazardous Materials Management Plan that was approved by the County Division of Environmental Health Services. The El Estero plant conforms to strict local, state, and federal standards designed to protect health and safety. Therefore, no significant, adverse impacts from El Estero are anticipated.

11-6 Comment acknowledged; no response necessary because the comment is not directly related to the EIR or the environmental review process.

11-7 The proposed park's water elements have been designed so that children can safely play in the water. Please see the Project Description for a discussion of the types of water to be used in the various elements. The park has been designed based on community input and to ensure that the open space is usable.

11-8 The elevation of the Great Meadow will range from 4.1 feet to 8.6 feet above sea level. The Great Meadow is a depressed area which would function as a local retention basin. Drainage Line A which is a 24-inch reinforced concrete pipe as well as two 10-inch PVC pipes would convey drainage from the middle of the meadow to Salsipuedes Street. The proposed drainage system is considered adequate to prevent significant, adverse flooding of the park.

11-9 Comment acknowledged; no response necessary.

11-10 A Phase I Hazardous Materials Assessment was prepared for the proposed park site and the findings of this assessment are contained in Section VI, I. Hazardous Materials. Petroleum contaminants were identified on the property and clean up or remediation is required as a mitigation measure. However, ammonia was not detected on the park site.

11-11 Comment acknowledged. The park was designed to appeal to a variety of users, including families and children. The Great Meadow area could be used as an open space area away from large trees for picnicking or sunning. The park includes components such as a tot lot, a carousel and Recreation Center at the Pump House which are designed for use by families with children. Also, a large Moorish fountain is proposed in the center of the Plaza component which is similar to your request.

11-12 Comment acknowledged; no response necessary.

11-13 Comment acknowledged; no response necessary.

11-14 Comment acknowledged. The reviewer is referred to comment 9-14 in which the applicants state that Fiesta Park, a previous project proposed for this site, was denied and the community made it clear it was not interested in retail/restaurant projects impacting Cabrillo Boulevard and the Waterfront Area.

11-15 The provision of a 75-bed youth hostel in the Waterfront Area is a Condition of Approval required by the California Coastal Commission if more than 2.0 acres and up to 3.4 acres of commercial use is developed on Parcel B of the Park Plaza Specific Plan (the portion of the project site where the hotel is proposed). The intent behind the Coastal Commission's condition was to provide low-cost lodging to allow greater use of the Waterfront Area by all segments of society. The reviewer is referred to comments 9-11 and 11-17, as well as Comment Letter 30.

11-16 Comment acknowledged; no response necessary.

11-17 Comment acknowledged; no response necessary.

11-18 Comment acknowledged; no response necessary.

11-19 Comment acknowledged; no response necessary.

11-20 Comment acknowledged; please see revised text.

11-21 Comment acknowledged; please see revised text.

11-22 Comment acknowledged; the reviewer is correct that no ammonia was detected on site.

11-23 Comment acknowledged; please see revised text. The Adjustment for Feasibility Risk is simply a factor which takes into account the feasibility of the proposed project alternatives. It represents a conservative approach, which recognizes that the type, size and mix of a project's components (land uses) is a factor which must be considered when determining project feasibility. It is a professional judgment since there are no set formulas or equations to arrive at the "correct" answer.

The 1.0 given to the Luxury Hotel Project does not mean that the project will have a 100% percent success rate. It simply means that there were no factors identified which would render feasibility of the project questionable. For the Reduced Project Alternative, an Adjustment for Feasibility Risk of 0.7 was applied. As described in the Economic and Fiscal Impacts Section of the DEIR, this factor reflects the significantly greater feasibility risk of this alternative compared to the Luxury Hotel Project alternative. A first-rate luxury hotel needs a "critical mass" or a sufficient number of rooms to support its restaurant and retail space, numerous services, marketing efforts, and overall operations of the project.

RECEIVED

APR 23 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

Comment Letter 12

To: Jan Hubbell, Project Planner
From: Nina Oshinsky, ERC

RE: COMMENTS ON WATERFRONT PARK, HOTEL, AND HOSTEL PROJECT (ENV 92-0107)

Dear Ms. Hubbell:

After reviewing the above document, I have the following comments to offer.

12-1 Page 12 - The last sentence in Section 3.0 Hostel specifies number of employees required to provide appropriate service. It is unclear to me if this is a total number or the number per shift. Perhaps this could be specified.

12-2 Page 75 - Cabrillo Blvd. should be shown as Route 225 and not Route 25. This also occurs on pages 76, 84, 89, 90, 93, 94, 96, 97, 102, and 103.

12-3 Page 165 - The last two sentences in the first full paragraph talk about the removal of existing vegetation and the short-term unavoidable significant impact. I think some text should be added as to how short is short. In other words, there should be some more concrete statements regarding time frames and how long it will take new vegetation to look mature. Perhaps the landscaping could be phased in to avoid or mitigate short-term visual impacts. Also, there should be some discussion as to how long it will take to accomplish the landscaping from the time of removal to the time of completion.

12-4 Page 183 - Under the Biological Resources Section, I would like to see a more detailed description on how the survey was performed, and extent of the survey. The reader should be informed specifically as to what was examined and how conclusions were formed from this process. I think that some more specific discussion on habitat survey especially with respect to the trees that are being removed and introduced would be warranted.

12-5 Page 188 - The second paragraph states that it would be easy to monitor people's activities around the Moreton Bay Fig Tree. The next page under mitigations goes on to say that the hostel should be responsible for the monitoring. I wonder whether the hostel should bear this responsibility or even if they could since the tree is off-site and I presume on public property? It seems like it would be an overwhelming task for they would have to monitor all activities at the tree, even those not related to hostel

12-5 cont. patrons. I think this mitigation should be reworked to relieve the hostel operators of this responsibility off-site. Information could be dispensed as patrons check-in regarding appropriate activities around the tree.

Thank you for your consideration.

Response to Comment Letter 12

12-1 Comment acknowledged; please see revised text.

12-2 Comment acknowledged; please see revised text.

12-3 Comment acknowledged; please refer to the response 7-6, paragraph 2. In addition, the text has been revised to include the anticipated length of short-term visual impacts.

The text has been modified to clarify the term short-term. However, each plant species is different in terms of the rate of growth, and it is beyond the scope of either the EIR or the applicant's proposed landscape plan to research the growth rate of each plant. The rate of plant growth is affected by many factors, including the health and age of the plant when planted, the soil conditions and ambient weather conditions such as sunlight, rainfall, temperature and humidity. The landscape industry generally uses broad terms to define growth rate, including rapid, moderate and slow as the typical rates. In this context, rapid would be 1-5 years, moderate 5-10 years, and slow 10 years or longer as the required time frame to plant maturity.

12-4 The text has been revised to describe the methods used for the biological field survey conducted by Interface. The tree report was prepared by Bill Spiewak; the EIR summarizes pertinent portions in accordance with the CEQA guidelines. Please refer to the original reports by Spiewak (no date), Rindlaub (June, 1992) and Britton (November, 1991) for the methods used by these researchers.

12-5 The text has been modified to place the responsibility of monitoring the Moreton Bay fig tree with the City of Santa Barbara Park Department, rather than with the operators of the hostel. The mitigation measure suggesting the provision of informational literature regarding the significance of the tree has also been added to the text.

CITY OF SANTA BARBARA Comment Letter 13

PARKS & RECREATION DEPARTMENT

PARKS OFFICE ..... (805) 564-5433
RECREATION OFFICE .. (805) 564-5418
FAX NUMBER ..... (805) 564-5480

PARKS: 402 E. ORTEGA STREET
RECREATION: 620 LAGUNA STREET
POST OFFICE BOX 1990
SANTA BARBARA, CA 93102-1990

April 26, 1993

RECEIVED

APR 26 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

Environmental Review Committee
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102-1990

Dear Committee Members:

13-1 With regard to the Environmental Impact Report reviewed at your meeting of April 16, the numbers the report uses to estimate traffic generation are high. Parks and Recreation Department maintains that per the Park Programming Matrix prepared by staff to estimate park usage, a maximum of 500 persons are anticipated to use the park on a given weekend afternoon.

If you have specific questions, please call me at 564-5431.

Sincerely,

Richard C. Johns
Parks and Recreation Director

/ty

Responses to Comment Letter 13

13-1 Comment acknowledged; please see response to comment 9-3.

Comment Letter 14

26 April 1993

Comments on Waterfront Park, Hotel and Hostel Draft EIR

T. Gerig, ERC

14-1 General comments. Overall, the draft EIR presented on April 16 seems to me to be a good starting point for the preparation of the final version of this report. Comments from the Planning and Transportation staffs and the City Attorney are unusually thorough and, combined with the other inputs received, should allow the preparation of a document that meets the requirements of CEQA. There are a few points where some additional elaboration perhaps could be helpful in reaching this goal.

14-2 First, let me say that I agree with the comment made by Committee Member Mohr regarding the tone of some of the presentation in the draft EIR. I think an analytical, neutral tone is appropriate for an EIR yet in places the draft reads like a prospectus for a stock offering.

14-3 At places in the text where comparisons are made, there probably should be more details given regarding the nature of the situation being compared. For example, on p. 80 "a survey" of guests of "an existing hostel in Santa Monica" was used to establish the trip generation rate for the hostel. This is vague. How large was the hostel, when was the survey done, does the rate so generated agree with other studies or ITE estimates? One cannot reliably judge whether or not the conclusions of this part of the traffic study are reasonable without this kind of information.

14-4 Traffic. On p. 86 a parking demand factor is generated using data provided by the management of the Red Lion. How does the rate of 1.28 spaces per room compare to ITE or other parking demand studies for similar situations. Is this rate unusually low or high?

14-5 The status of the City traffic modeling program should perhaps be clarified (p. 95). It was my understanding that this model was not being maintained because of lack of staff. Is the output of the current, presumably obsolete, program reliable?

14-6 I believe that there is an EIR in preparation with regard to the proposal from the Red Lion to be relieved of certain parking-related restrictions on their CUP. Will the material in the present EIR be used in that EIR? If so, it should be ascertained that Staff has reviewed this material in light of the questions that were to be addressed in the Red Lion EIR.

14-7 Visual. The computer rendering on p. 174 is the kind of thing I have been advocating for EIRs for several years and my congratulations to all who were involved in producing Figure VIF-5. I concur with Staff's request for additional renderings of this nature, but suggest that, for at least one such Figure, that a comparison Figure be prepared so that the effects of a two-story structure can be compared to the proposed three-story structure.

14-8 With regard to the visual effects of the proposed hostel, I believe that it is important that some indications of the proposed landscaping plan for the hostel be provided. The visual impact of this structure when viewed from US101 will largely be influenced by the height and density of plantings on the western side of the property. (My preference would be for some rather dense foliage of a texture and color that will highlight the fig tree.)

14-9 Public safety. The statement on p. 196 that the fire alarm system will be "reliable during all adverse circumstances" is amusing. How about "Fire alarm system that is regularly tested and designed to be reliable under all adverse circumstances..."?

14-10 The discussion on p. 200 regarding recoverable hydrocarbons on the PFT site should indicate how much above the 100 mg/kg level were the soil samples the soil samples taken.

14-11 Financial. Precisely, how does the hotel support the hostel (p. 225 and other locations)? Why should there be any relation between the hotel and the hostel, given that the hostel is a condition of a specific plan with or without the hotel?

14-12 I trust that persons with expertise in hotel development, management, and marketing not associated with the Redevelopment Agency or the PFT, will analyze the financial documentation that is available and provide comments on the assumptions and projections that were used in reaching the conclusions summarized in the draft EIR.

14-13 I hope that the financial analysis includes a detailed study of the costs to the City of developing and maintaining the park, including consideration of the costs of protecting the park from damage during the hours that it is closed, and including consideration of any additional insurance burdens the features of the park will place on the City. The value of the contribution the PFT proposes to make to the annual cost of maintaining the park should be discussed in this context. (At some point, consideration should be given to making the amount of this contribution dependent on the CPI, so that it is increased or decreased as conditions warrant.)

14-14 Alternatives. A comment from the public has suggested that it would be wiser to retain the site proposed for the hostel for use in conjunction with the railroad station, probably as parking. This point has merit. Some comments from Transportation staff would be useful in this context, and perhaps the idea should be mentioned in the Alternatives section.

14-15 Additional discussion/justification is needed for the various numbers (ranks) that appear in Table XI-1. How was it decided, for example, that the traffic impacts of the reduced project are so much different from that of the project proposed that it rates a lower number? Or that the biological effects at the Wilcox site are so much greater that this category deserves a much larger number?

redlion.30

Responses to Comment Letter 14

14-1 Comment acknowledged; no response necessary.

14-2 Comment acknowledged. This EIR has been designed to analyze the issues identified in the Initial Study in a neutral tone while providing decision-makers, agency staff and the public with an easy-to-read, full disclosure document. Inclusion of economic and fiscal analysis in an EIR is allowed under the State CEQA Guidelines, however it is not the norm and its inclusion in this EIR may account for the difference in tone that is noted.

14-3 As indicated in the EIR, hostel trip generation is expected to be low. There is no "textbook" ITE trip rate for hostels and the information from the Santa Monica surveys was judged to be reasonable by City staff and the EIR consultants.

14-4 The parking generation used in the EIR was based on actual counts at the Red Lion Hotel, not estimates. The parking rate used is higher than the ITE rate.

14-5 The City model is operational, but is not used on a regular basis to evaluate land use changes or development proposals. The model has been used to predict changes in traffic distribution resulting from the Garden and Salsipuedes Street extensions.

14-6 A substantial portion of the traffic analysis contained in this EIR will be incorporated into the analysis for the Red Lion EIR.

14-7 Comment acknowledged; please refer to response 6-44.

14-8 Comment acknowledged. Although a detailed landscape plan with specific illustrations of the hostel's proposed vegetation is not available at this time, Figure III-5, Hostel Site Plan also depicts the general type of vegetation proposed in the hostel's landscaping. In addition, an architectural rendering of the proposed hostel viewed from the Moreton Bay Fig Tree is on file with the City's Planning Division. As for the planting of dense foliage consisting of a texture and color that will highlight the fig tree, no significant adverse visual impacts would result with the development of the proposed hostel and requiring the planting of such vegetation is neither warranted or required. However, your recommendation will go on file and may be considered at a later date prior to consideration of the project by Planning Commission and City Council.

14-9 Comment acknowledged; please see revised text.

14-10 Comment acknowledged; please see revised text.

14-11 Comment acknowledged; please see revised text.

14-12 Comment acknowledged; please see revised text. Economics Research Associates (ERA) is a real estate and economic consulting firm which has broad experience in all facets of real estate and land use management consulting. ERA was hired by Interface to work on the economic and fiscal review of the proposed waterfront hotel. ERA is in no way associated with the City of Santa Barbara Redevelopment Agency or the Parker Family Trust.

14-13 Comment acknowledged; please see revised text.

14-14 The hostel site is designated as Hotel and Related Commercial in the City Zoning Ordinance. There have been considerable formal and informal discussions of possible uses of this site since the original adoption of the Central City Redevelopment Plan. While the hostel site could be used as a public or private parking lot or garage, there are no present requirements for such a use. At such time as the Railroad Station area is improved or remodeled, the environmental review of that project must deal with the project-specific and cumulative parking impacts as appropriate.

14-15 The methodology used for the ranking of impacts in Table XI-1 is based on the assessed level of impacts that would occur with the implementation of the various alternatives. The conclusions are based on the comparison of environmental documentation which exists for the various alternative sites and designs. For example, according to the Cyprus Point EIR, the Wilcox site is known to contain sensitive biological resources. However, as discussed within the text preceding Table XI-1, the understanding is that if any alternative were seriously considered, additional environmental analysis would occur on the site. The traffic trips were calculated for each of the alternatives using the traffic rates listed in the 1991 Institute of Transportation Engineers, Trip Generation Manual, Volume 5. Based on the calculated traffic trips, the reduced project density would result in fewer traffic trips than the proposed project and was therefore assigned a lower ranking number.

Waterfront Park, Hotel and Hostel - Draft EIR **Comment Letter 15**

Comments by Greg Mohr, Member, Environmental Review Committee

	Page	Comment
5-1		Throughout the EIR, there is reference to the run-down conditions of the park/hotel site and to the unplanned/blighted appearance of the open space. This has been allowed by the applicant; the site could be cleaned up and kept neat and tidy with or without this project. The ongoing references to the site's appearance tend to help to portray this project as a substantial improvement. That may or may not be the case; however, it is not the place of the EIR to make that call.
	Summary	
15-2	vi	Last ¶, line 6 - "...significance and <u>proposed</u> mitigation measures. ..."
15-3		Last ¶, line 9 - "...options for mitigating <u>or avoiding</u> significant..."
15-4	xi	3.0, ¶ 1, line 6 - This project is not in the Eastside neighborhood.
15-5		3.0, ¶ 2 - The description of the park/hotel site as "unplanned/disturbed open space" betrays bias.
15-6	xi/xii	5.0 - There should be no discussion of beneficial <u>environmental</u> impacts; as for economic effects, the statement regarding the "No Project" alternative's lack of beneficial impacts is no different than with most projects. The final paragraph betrays a bias against the alternatives in favor of the project as proposed.
15-7	xvi	Noise Impacts, 1st 3 mitigations - Is it "DNL" or "L_{dn}"?
	Project Description	
15-8	4	Table III-1 - A map to display the locations of these Assessor's Parcels would be useful.
15-9	6	1.0 - How many spaces would be provided for the park on the offsite parcel? Who owns the property? Who is responsible for construction?
	Land Use Considerations	
15-10	30	¶ 2, lines 7-10 - Please clarify how an Amendment to a Specific Plan is included in the "Pending Project" category of Charter Section 1508 (and the General Plan and Zoning Ordinance).
15-11	34	Policy 5.0, ¶ 1, line 5 - "...this visually degrad<u>ed</u> storage area..."
15-12	36	2.4, ¶ 2 - The park's consistency with the Noise Element should be based on the proposed use, not on the zoning.
15-13	46	¶ 1, line 9 - "provision of a ~~maximum~~ <u>minimum</u> of 100..." (also, page xv, 5th mitigation measure).
15-14		¶ after Policy 4.4, line 4 - "The room rates <u>of the hostel</u> are oriented to..."

	Page	Comment
15-15		Policy 4.6 - The last sentence of this policy (regarding residential uses) is not included in the discussion of policy consistency.
15-16	49	Last ¶, line 5 - "...which is complementary of the..."
15-17	50	Line 2 - "...exists to complement the proposed..." Also, this paragraph needs to conclude with a discussion of the project's consistency with the "lack of Congestion" portion of the policy.
15-18	51	¶ following Section 30230, lines 1/2 - "...enhanced, and where feasible, restored ~~where feasible~~ (emphasis added). Section 30231 (see below) requires that..."
15-19		¶ 2 following Section 30230, line 2 - "...wetlands that were ~~formally~~ formerly tidal but have..."
15-20		Section 30231, line 4 - "...discharges and ~~entertainment~~ entrainment, controlling runoff,..."
15-21	56	Specific Plan Section 2 - The discussion here should include the Red Lion's proposal to do an offsite parking agreement for major events and how that will be taken into account as part of this project's proposed offsite parking agreement on the Red Lion property.
15-22	57	¶ following Visual and Aesthetics, last line - "...consistent with the amended setback requirements."
15-23	58	¶ following Building Height - Doing the study does not result in consistency. Does the study or the EIR show that the purpose behind the study (maximizing view protection/enhancement) has been met?
15-24		¶ following View Corridors/Distance Between Buildings - Again, just doing the study does not show that the purpose behind the study has been met (5.b.).
15-25	59	¶ following Other Regulations - Discuss problem of interpreting "Low Intensity."
15-26	60	Line 4 - "potentially consistent with this condition."
15-27	62	8.0, ¶ 1, line 4 - "...unless a youth hostel is developed ~~on the property~~. If a hostel..."
15-28		8.0, ¶ 2 - The hostel is only required if the applicant chooses to develop more than 2.0 acres of the property.
15-29	69	Line 7 - "Therefore, the ~~slight~~ traffic trips that will be drawn..."

Traffic, Circulation and Parking

15-30		Please clarify the Traffic thresholds for project-specific and cumulative impacts throughout this section (pages 73, 85 and 95).
15-31	72	¶ 1, lines 6/7 - The August counts do not represent absolute peak weekend conditions. The Fourth of July, Labor Day and Fiesta

	Page	Comment
15-31 cont.		weekends would be absolutes. The counted times would represent heavy traffic.
15-32		Last ¶, line 2 - "...unstable flow conditions <u>and severe congestion</u> with volumes..."
15-33	80	¶ 2, line 9 - Assuming 3.4 people per vehicle seems high.
15-34	88	2.5.1, ¶ 1 - Would ramp queues on Cabrillo/101 offramps back up enough to block Highway 101? If they would, this is clearly unacceptable.
15-35	95	¶ 2 - This paragraph would appear to conclude that the project would result in project-specific impacts in addition to cumulative impacts.
15-36	105	Footnote 21 - "Congestion Management Plan, Santa Barbara County <u>Association of Governments</u>, Adopted January 1993."
15-37	107	See comment on Page 56 regarding the Red Lion proposal.
	<u>Air Quality</u>	
15-38	111	1.2 - The assumption that visitors would be attracted to the Santa Barbara area with or without the project is incorrect (otherwise the project is a flop!). It appears that the emission calculations only assume local trips for purposes of determining the level of air pollutant emissions. Long distance travel is not considered. As discussed at the ERC hearing on the Draft EIR, this should be clarified in the Final EIR.
15-39	112	¶ 1 - Define "ROI."
15-40	113	1.4, ¶ 1 - This indicates that Santa Barbara County is in attainment for PM_{10}. I do not believe this is the case.
15-41	115	Table VIB-1 - If 1991 and 1992 data are available, please include.
15-42	117	1.4.5, ¶ 2, line 2 - Replace "absorbed" with "a<u>d</u>sorbed." 1.4.5, ¶ 3, lines 6 and 8 - "u<u>g</u>/m³"
15-43	119	Table VIB-2 - Is last half-quarter (of 6½) dropped from table because it is clearly not significant? If so, say so; if not, please explain.
15-44	120 & 124	Page 120, at top, indicates a three degree engine timing retard; page 124 (4.1.1, ■3) indicates a two degree retard. Please make consistent or explain the difference.
15-45	120	Footnote 28 - "V<u>i</u>jaya"
15-46	121	Footnote 31 - "V<u>i</u>jaya"
15-47	122	¶ 3, lines 3/4 - "...flow was 17.1 <u>ppm</u> for the 1-hour..."
15-48	123	Table VIB-4 - The two intersections discussed are listed twice. Are they intended to convey two different time periods? Please explain.

	Page	Comment
15-49	126	Last ¶, line 4 - The mitigation measures are not numbered.

Archaeological Resources

15-50	128	1.2, ¶ 2, line 6 - The previous page indicates Shore Acres existed until 1920; it says 1922 here. Please clarify.
15-51		1.2, ¶ 3, line 3 - Previous page says "Barker"; it says "Baker" here. Please clarify.
15-52	133	¶ 3, last line - "...need not be preserved or <u>its damage</u> mitigated."
15-53		¶ 5, line 3 - "...parking garage <u>probably</u> will not result in direct adverse impacts to any ~~known~~ <u>unique</u> cultural resources..."
15-54	134	4.2, line 7 - "...impacts to any ~~known~~ <u>unique</u> cultural resources..."
15-55		5.1 - Please note that the Initial Study required a mitigation measure regarding monitoring during clearing and excavation activities.

Historical Resources

15-56	136	¶ 2 - Please include additional discussion of conclusions regarding the Estero Racetrack, Puritan Ice Company and the railroad spur from the Fiesta Park EIR.
15-57	138	The end of this section is missing.

Noise

15-58	141	¶ 2 - "DNL" or L_{dn}?
15-59	147	Noise impacts are physical; the noise impacts should be based on site <u>use</u>, not on zoning. It is inconsistent that trains result in a significant impact, but cars do not.
15-60	148	2.1.2, ¶ 1 - What about noise from train horns as they are leaving or arriving at the station? That noise is not blocked by existing buildings.
15-61	158	1st ■ - "low to moderate sound level" needs to be better defined, as does "high level sound amplification."
15-62		2nd ■ - Who pays to eliminate the rough spots on the tracks?
15-63		4.0 - Change conclusion to reflect the ERC's consensus that noise impacts from traffic on Cabrillo Boulevard would be significant.

Aesthetic Resources

15-64	166	Figure VIF-2 - It looks like all of the existing trees are eliminated. The text indicates that is not the case. Please show existing trees to remain on this figure.
15-65	167	¶ 2 - The concluding sentences of this paragraph seem to represent advocacy of the project.

	Page	Comment
15-66	169	¶ 2, line 3 - Cabrillo Boulevard's consideration as a potential scenic highway is also based on views of the mountains, Andree Clark Bird Refuge and other visual resources, in addition to the shoreline.
15-67	173	¶ 1, line 2 - The derived figure of 2,781 persons per day park use is meaningless. Daily use would vary wildly.
15-68	175	Line 4 - "...considered a relatively beneficial visual impact.
15-69	177	■ 1 - "Old Railway Express Building (Open Air Bicycles) located..." [capitalization of Express Building needs to occur elsewhere in this section]
		Biological Resources
15-70	184	1.1.2, ¶ 3 & Footnote 65 - Please review study to determine how recently Monarch butterflies may have used site.
15-71	186	1.2 - Include a brief synopsis of the measures to promote the health of the Moreton Bay Fig Tree included in the referenced study.
15-72	187	2.1.2, ¶ 1, lines 8/9 - "...(i.e., a flooding event with a statistical recurrence interval of 100 years or that has a one percent chance of occurring in any given year)."
15-73	188	¶ 2, last sentence - Does "this" refer to the hostel or the City's monitoring activities?
15-74		■, line 1 - Replace "should" with "shall."
15-75	189	3.3.2, line 6 - "lawn area and adding fencing as..."
		Risk of Upset
15-76	193	Footnote 71 - This study seems dated. Both the La Conchita and Sacramento River derailments have occurred since that report, along with many others.
15-77	195	3.3.1, last line - What is "very remote"? It does not show up on Table VIH-1 on page 191.
15-78	196	¶ 1 - Why would development of the crossing at Salsipuedes Street require abandonment of the Chapala Street crossing? Also, wouldn't pedestrian and bicycle traffic still use Chapala Street?
15-79	197	■ 4 - How would fire sprinkler systems help in the event of a train derailment?
15-80		6.0, line 6 - It could be inferred that track conditions are ideal for derailment. Please rephrase.
		Hazardous Materials/Wastes
15-81	207	■ 2, last line - "...Environmental Health Services Department."

	Page	Comment
		Recreation
15-82		The whole discussion of recreation issues seems to focus on this park as serving the Eastside neighborhood. This park is in the Waterfront Area and does not serve the Eastside any more than it does any other area of the City. The focus should be on the expansion of a community park, not its possible use as a neighborhood park.
15-83	209	Line 6 - "...provide a full complement of facilities..."
15-84	211	Specific uses such as knot and herb gardens and teen center uses do not appear in the Project Description. Which uses are correct?
		Economic and Fiscal Impacts
15-85	215	2.0, ¶ 2 - Please clarify why the Red Lion, the Sheraton and El Encanto do not qualify as "first-rate luxury" hotels.
15-86	218	¶ 1, line 4 - What defines a "modestly priced" hotel and who defines it?
15-87		3.0, ¶ 1, line 2 - What is meant by an "effective room rate"?
		OTHER CEQA CONCERNS
15-88		Short Term Uses Vs. Long Term Productivity - Long term productivity is not discussed anywhere in the ensuing text.
15-89	228	Line 2 - The recreational facilities will <u>not</u> be within the Eastside.
15-90	229	2.0, ■s - These should be included for the hotel as well as the hostel and the TSMP requirements should be included here.
		Growth Inducement
15-91	230	¶ 1, last sentence - This sentence is redundant.
15-92	232	¶ 3 - Percentages to the second decimal implies far more accuracy than there really is. Please round off to closest whole number.
		Alternatives
15-93	235	¶ 2 - The owners could clean up the property with or without the project and, in terms of the hazardous waste contamination, should do so in any case.
15-94		2.0, ¶ 1, lines 6/7 - Who considers 125 rooms to be the minimum acceptable size?
15-95	237	¶ 1, line 10 - How would traffic and air quality impacts be worse for this alternative than for the project?
15-96	239	¶ 1, line 3 - The most recent project on the site is a proposed 45 lot residential subdivision.
15-97		¶ 1, last line - The Draft Supplemental EIR for Cypress Point was released and the review period is over.

	Page	Comment
15-98		¶ 4, line 2 - "...land use ~~impacts~~ conflicts that would ~~also~~ occur."
15-99	242	¶ 5 - The modification of the present open space character of the Jesuit property would represent trade-offs - not necessarily significant impacts.
15-100	243	Line 3 - "...Ocean-Related Manufacturing, which, according to the City LCP, is a priority in this area of the Coastal Zone."
5-101		¶ 1 - Why would noise and visual impacts be greater at this location? Being further away from Cabrillo Boulevard should be positive. Hazardous materials impacts would appear to be speculative. It does not appear that traffic and parking issues would be significantly different. More consideration should be given to this alternative.
15-102	244	4.3.1, ¶ 2, last line - Visitor-serving uses are commercial uses.
.5-103		4.3.1, ¶ 3, last line - The Hostel is consistent with the zoning on the site (HRC-2). Therefore, there appears to be justification for a hostel.
5-104		4.3.2 - See comments on 4.3.1 above.
15-105	245	5.0, ¶ 3, line 7 - What would PM PHT weekday and weekend traffic be for this alternative? This would be easier to compare.
5-106		5.0, ¶ 3 - Why would commercial and residential development need to be funded by the City?. Why couldn't the Salsipuedes and Garden Street extensions be partially funded by the applicant? Just because this applicant can't make the alternative work doesn't mean another developer couldn't.
5-107	246	¶ 2 - See comment immediately above.
5-108	247	¶ 2 - The wrong question is asked. The point is, is a teen-oriented park with a skateboard park at all suitable compared to what is proposed? or more suitable than what is proposed? I think it is arguable.
15-109		B., ¶ 1 - The "No Project" alternative is the environmentally superior alternative. However, as you note in the next paragraph, if that is the case, another environmentally superior alternative must also be selected.
15-110	248	Alternative Design - If traffic.impacts drop from a 2 to a 1 (when compared to the project), it seems that air quality should change from a 4 to a 3.

[jh/park/mohr-com.out]

Response to Comment Letter 15

15-1 The EIR references the existing condition of the site in order to portray the environmental setting of the project site. Development of the site with new visitor-serving or public recreational uses would, in fact, improve the appearance of the site. The report preparers are unaware of the ability of the City to require a private landowner to keep their property "neat and tidy," unless the present condition of the property threatens the public's health, safety and welfare.

15-2 Comment acknowledged; please see revised text.

15-3 Comment acknowledged; please see revised text.

15-4 Comment acknowledged; please see revised text.

15-5 Comment acknowledged; please see revised text.

15-6 Comment acknowledged; please see revised text.

15-7 Comment acknowledged; please see revised text.

15-8 Comment acknowledged; please see revised text.

15-9 Comment acknowledged; please see revised text.

15-10 Comment acknowledged; please see revised text.

15-11 Comment acknowledged; please see revised text.

15-12 Comment acknowledged; please see revised text.

15-13 Comment acknowledged; please see revised text.

15-14 Comment acknowledged; please see revised text.

15-15 Comment acknowledged; please see revised text.

15-16 Comment acknowledged; please see revised text.

15-17 Comment acknowledged; please see revised text.

15-18 Comment acknowledged; please see revised text.

15-19 Comment acknowledged; please see revised text.

15-20 Comment acknowledged; please see revised text.

15-21 Comment acknowledged; please see revised text.

15-22 Comment acknowledged; please see revised text.

15-23 The study of building heights and view corridors is a requirement for application submittal. Neither the study itself nor the EIR indicates whether or not the purpose and intent behind the study requirement has been met. However, in concluding that the project will not result in unavoidable long-term impacts on views, it appears that the basic purpose has been met.

15-24 See response to comment 15-23 immediately above.

15-25 Comment acknowledged; please see revised text.

15-26 Comment acknowledged; please see revised text.

15-27 Comment acknowledged; please see revised text.

15-28 Comment acknowledged; please see revised text.

15-29 Comment acknowledged; please see revised text.

15-30 The discussion of traffic thresholds was taken directly from the City's policy on this issue.

15-31 Comment acknowledged. As a matter of definition, the term "absolute" is intended to describe the summer period when the counts were conducted, therefore reflecting the highest volumes these intersections experience on average. Holidays or special event days, while possibly experiencing "absolute" peak volumes, are not generally analyzed for peak hour reports, due in part to their infrequency of occurrence and because improvement measures for these days (i.e., human traffic controllers, valet parking) generally would not address average day conditions. In order to better clarify the peak period discussion, the word "absolute" should be deleted from paragraph one on page 72 of the DEIR.

15-32 Comment acknowledged; please see revised text.

15-33 The vehicle occupancy of 3.4 people per vehicle for the park generated trip calculations were obtained from data on occupancies as published in CalTran's trip generation research. The CalTrans surveys listed vehicle occupancies for a large number of parks and beach areas in California. The vehicle occupancy figure of 3.4 derived for this report represents the average of all of the park and beach surveys listed.

15-34 While the intersection operation indicates delays, there is no evidence that vehicle queues extend onto the freeway.

15-35 Comment acknowledged; please see revised text.

15-36 Comment acknowledged; please see revised footnote.

15-37 Please see response to comment 14-6.

15-38 Comment acknowledged. Market surveys indicate that Santa Barbara is currently losing high-end, luxury class overnight tourists to other Southern California cities, and the proposed hotel is intended to capture some of these tourists. However, there are no accurate methods to identify the origin (i.e., place of residence) of future guests of the proposed hotel. Any attempt to assign long-distance origins to future guests of the proposed hotel would be highly speculative and would be inappropriate for this CEQA analysis. The industry standard, employed in a number of recent EIRs in the County of Santa Barbara and accepted by APCD, is to base the analysis of long-term air quality impacts on the immediate (i.e., local) activities and operations of the facility, even if guests would be attracted from outside the area. Emissions from long distance vehicle trips around the state are governed by the California Air Resources Board, primarily through automobile manufacturer emissions controls and the vehicle smog inspection program. It is beyond the authority of the Santa Barbara County Air Pollution Control District or City of Santa Barbara to place controls or conditions upon indirect long-distance automobile trips.

15-39 Comment acknowledged; "ROI" stands for Region of Influence, as identified in the Air Quality Section of the EIR. The ROI is that geographical area which is likely to be affected by air-borne emissions associated with a proposed project.

15-40 Comment acknowledged; however, the referenced paragraph is accurate with respect to classification of Santa Barbara County as "attainment" for PM_{10} concentrations under NAAQS. The County is only "non-attainment" for this pollutant under CAAQS, as indicated in the discussion which follows the referenced paragraph.

15-41 Comment acknowledged; data for 1991 was recently released, and Table VIB-1 has been amended to include this information. Data for 1992 has not yet been released by the APCD.

15-42 Comment acknowledged; please see revised text.

15-43 Comment acknowledged; there was an erroneous reference in the air quality section, the construction period would be 5 1/2 quarters (16.5 months), not 6 1/2 quarters. All calculations were based upon the correct time period of 16.5 months. Therefore, complete construction emissions are contained in the referenced table.

15-44 Comment acknowledged; all references have been changed to the correct quantity of "two degrees" timing retard.

15-45 Comment acknowledged; please see revised text.

15-46 Comment acknowledged; please see revised text.

15-47 Comment acknowledged; please see revised text.

15-48 Comment acknowledged; the table has been revised to indicate that the upper entries depict emissions associated with extension of both Garden and Salsipuedes Streets, while the lower half depicts emissions with extension of only Salsipuedes Street.

15-49 Comment acknowledged; please see revised text.

15-50 Comment acknowledged. However, the text reads from "1909 until <u>about</u> 1920", not until 1920.

15-51 Comment acknowledged; please see revised text.

15-52 Comment acknowledged; please see revised text.

15-53 Comment acknowledged. However, a complete Phase 2, sub-surface archaeological survey was not prepared for the entire park and hotel site. Therefore, it is unknown whether unique cultural resources may be uncovered. Nevertheless, the results of the Phase 2 archaeological survey prepared on the Shore Acres Locality did not reveal or identify any potentially significant cultural resources and no known archaeological resources are anticipated to be encountered.

15-54 Comment acknowledged; please see response to Comment 15-53.

15-55 Comment acknowledged; please see revised text.

15-56 Comment acknowledged. It should be noted that the Final Environmental Impact Report on the Fiesta Park Project which was prepared in 1987 assesses potential impacts to the Estero Racetrack, the Puritan Ice Company Plant and the railroad spur. The Fiesta Park Project EIR concluded that development of the proposed park and hotel site would not result in a significant impact to these historic resources. A copy of the Final Fiesta Park Project EIR is on file for public review at the City's Planning Division. Because the Puritan Ice Plant was removed in 1991 and no historically significant deposits associated with the Estero Racetrack and the railroad spur were identified in the 1987 Historical Resources Evaluation or the 1993 Phase 1 and Phase 2 archaeological surveys, further discussion within the Historical Resources Section is not warranted.

15-57 Comment acknowledged; please see revised text.

15-58 Comment acknowledged. DNL and Ldn are equivalent and are both commonly utilized as shorthand for the Day-Night Average Sound Level. The latest draft of the proposed ANSI standard on Acoustical Terminology depicts DNL as the "abbreviation" and Ldn as the "symbol". Typically, DNL is utilized within text and Ldn in an equation. The text of this EIR has been revised to conform with ANSI recommendations. In addition, please refer to Acoustical Terminology Definitions contained within Appendix E of this Environmental Impact Report for further explanation of acoustical terminology.

15-59 Comment acknowledged; the text has been revised to reflect this comment.

15-60 Comment acknowledged. Train horns do produce high noise levels, however, noise resulting from train horns is of short duration and is included in the computation of the overall noise exposure at both the project sites. Although the train horn noise at the hostel site is partially shielded by intervening structures, train horns would be audible at the hostel site and especially at the hotel site. It should be noted that train horns are designed as a safety feature in order to announce the presence of a train and are often audible over distances of several miles. Nevertheless, train horn noise at both project sites would not be significant when analyzed on the basis of the overall noise generation and the resulting DNL.

15-61 Comment acknowledged. A working definition of "low to moderate sound levels" amplification would be: "amplified sound levels not exceeding 80 dB at the rear of the audience area," as

discussed in the Park's Public Address System within the Noise and Vibration Section of this EIR. "High level sound" would be levels higher than 80 dB at the rear of the audience. The text has been revised to incorporate the above explanation into the Noise and Vibration Section of this EIR.

15-62 Comment acknowledged. It should be noted that the elimination of uneven joints in the railroad tracks within the vicinity of the hotel site is a recommended mitigation measure and not required. However, if the City of Santa Barbara decides to require the above mitigation measure as a condition of approval for development of the proposed project, it is assumed that an agreement between the Parker Family Trust, the City of Santa Barbara and Southern Pacific would have to be reached. The cost of eliminating uneven segments of track would be decided with completion of this agreement.

15-63 Comment acknowledged. The text has been revised to describe traffic noise as an "unavoidable significant adverse noise impact" within portions of the park less than 143 feet from the center line of Cabrillo Boulevard.

15-64 Comment acknowledged. Because of the large linear size of the park and hotel site, it is not possible to illustrate all existing trees proposed for removal on Figure VIF-2, Conceptual Landscape Plan. However, project blueprints (Concept Planting Plan) which are on file with the City of Santa Barbara's Planning Division depict the existing trees proposed for removal. In addition, Table VIF-1, Tree/Shrub Inventory provides the number of trees and shrubs proposed for removal. It should also be noted that Appendix G of this Environmental Impact Report contains a Tree Management Plan prepared for the park and hotel site. This Tree Management Plan provides an extensive tree inventory (i.e., type, size and health of existing trees) of all trees located on-site. Therefore, please refer to the above referenced material for additional information on the park and hotel site's existing trees.

15-65 Comment Acknowledged. The report preparers have used their best efforts to prepare a complete, concise, non-biased and reliable full-disclosure environmental document.

15-66 Comment acknowledged; please see revised text.

15-67 Comment acknowledged; no response necessary.

15-68 Comment acknowledged. It is the report preparer's professional, subjective opinion that the obstruction of existing foreground views of the City's industrial area along this scenic highway is considered to be a beneficial visual impact, as a result of the visually unappealing nature of the industrial area. The addition of the term "relatively" is unwarranted, and would change the stated conclusion is a manner not intended by the report preparers.

15-69 Comment acknowledged; please see revised text.

15-70 Comment acknowledged. As noted in the EIR, a small number of butterflies continue to use the site. However, the site is not a roost or overwintering area. The Calvert report does not provide a reference of specific dates of the historic use of the site as a roost.

15-71 Comment acknowledged. The text has been revised to include this information.

15-72 Comment acknowledged. The text has been revised to include this information.

15-73 Comment acknowledged. The text has been revised to clarify that the paragraph is referring to the construction and operation of the hostel.

15-74 Comment acknowledged; please see revised text.

15-75 Comment acknowledged; please see revised text.

15-76 Comment acknowledged; please see revised text.

15-77 Comment acknowledged; please see revised text.

15-78 Comment acknowledged; please see revised text. Southern Pacific Transportation Company is reluctant to add any more at grade crossings due to safety and traffic impacts. Therefore, if an at grade crossing is added at Salsipuedes Street, it would be a trade, and the Chapala Street crossing would be closed.

15-79 Comment acknowledged. The fire sprinkler requirement is a standard SPTC safety feature in case of explosion occurring during derailment.

15-80 Comment acknowledged; please see revised text.

15-81 Comment acknowledged; please see revised text.

15-82 Comment acknowledged. The recreation section has been revised to focus more on community needs rather than neighborhood needs.

15-83 Comment acknowledged; please see revised text.

15-84 Comment acknowledged. The project application does not propose a "knot or herb garden" although at the time detailed planting plans are prepared it may be included. Please see revised text.

15-85 Comment acknowledged; please see revised text. The qualification as a "first-rate luxury" hotel was based on a personal familiarity with the hotel projects in the area and on the Official Hotel Classification System which is used in Official Hotel Guide, a publication which provides in-depth descriptive information on 30,000 hotels around the world.

The Official Hotel Classification System is comprised of three basic categories, Deluxe, First Class, and Tourist Class. Within each category a selection of modifiers (superior, moderate, limited service) further define the hotel's type. According to the Guide, a Superior Deluxe classification is considered a "first-rate luxury hotel." The official Hotel Guide Classification System is as shown an Attachment 1. According to the Guide, Fess Parker's Red Lion Resort, the Sheraton Santa Barbara Hotel & Spa, and El Encanto Hotel & Garden Villas were rated as Superior first-class. The Four Seasons Biltmore, located in the unincorporated area of Montecito, was a given a Deluxe rating.

15-86 Comment acknowledged; please see revised text. A "modestly priced" facility can generally be described as one with room rates between $65 to $100 per night. It is neither a luxury hotel or a property that is targeted to the budget conscious travelers. In reference to the Official Hotel Guide Classification System shown in Attachment 1, a "modestly priced" facility would generally fall between a First Class to a Moderate First Class hotel. There is no set definition as to the classification of hotels by room rates. Lodging facilities are usually rated by the overall service level and amenities offered.

15-87 Comment acknowledged; please see revised text. The "effective room rate" is simply the average daily rate that the Hotel actually charges. "Rack room rates," in comparison, are what hotels publish and use as the basis for providing discounts. It is important to note that hotels usually offer discounted rates to, for example, corporate, government, and senior guests. Group travelers, in particular, often receive a substantial discount from published rack rates.

15-88 Long-term productivity is discussed in the second paragraph of both sections 1.0 Park and Hotel Site and 2.0 Hostel Site.

15-89 It is acknowledged that the park is <u>not</u> located in the Eastside throughout the text. However, as a regional park, the proposed park can provide recreational facilities to the adjacent Eastside, especially with the extension of Salsipuedes Street which will make the project site more accessible.

15-90 All of the bullets included in section 2.0 to decrease the hostel's energy consumption have already been included in the park and hotel's Energy Conservation Plan. Additionally, the hostel is expected to generate very limited traffic trips and the majority of hostel guests are expected to use alternative modes of transportation, as is discussed in the Traffic, Circulation and Parking section. Therefore, there is no impact that would require development of a TSMP for the hostel.

15-91 Comment acknowledged; please see revised text.

15-92 Comment acknowledged. City Planning staff specified that all decimals should be rounded to the hundreds place in order to make the estimates as accurate as possible. In accordance with this direction, numbers have not been rounded off to the nearest whole number.

15-93 Comment acknowledged. Without approval of the project, the EIR alone can not require the property owners to clean up the potentially hazardous materials on site. Perhaps there is another mechanism which the City or County could use to make the owners clean up the site if no project is approved on this site.

15-94 Comment acknowledged. Economic Research Associates, who have studied the fiscal feasibility of the project, have determined that a 125 room hotel would be the least amount of rooms that would make the project economically viable and potentially realistic. According to CEQA Guidelines Section 15364, a feasible alternative is one which can be "accomplished within a reasonable period of time, taking into account economic, legal, social and technological factors." The reviewer is referred to the Economic and Fiscal Impacts, Section VIII, and to the ERA Report on file with the City Community Development Department.

15-95 Comment acknowledged. The impacts of this alternative are listed in the original EIR and Specific Plan documents which state that there would be significant air quality and traffic impacts. The

report preparers have not stated that impacts would be worse for either this alternative or the proposed project. Rather the statement is made that unavoidable impacts would occur in these two issue areas with implementation of either alternative.

15-96 Comment acknowledged; please see revised text.

15-97 Comment acknowledged; please see revised text.

15-98 Comment acknowledged; please see revised text.

15-99 Comment acknowledged; no response is necessary.

15-100 Comment acknowledged; please see revised text.

15-101 Comment acknowledged. Existing land uses in the Southern Pacific property are industrial, noise intensive and visually unappealing by nature. A high-priced luxury hotel would not be conducive or compatible with existing development, in regard to noise and aesthetic impacts.

15-102 Comment acknowledged; please see revised text.

15-103 Comment acknowledged; please see revised text.

15-104 Comment acknowledged; no response is necessary.

15-105 Comment acknowledged. It is not within the scope of this EIR to do peak hour trip counts for alternatives. We have provided average daily trips, but not peak hour trips. This entire discussion has been revised and moved to a new section titled "Alternatives Previously Considered". The reviewer is referred to this new section.

15-106 Comment acknowledged. ERA and City Staff originally felt it was most realistic that the city would purchase the site for such an alternative. However, this assumption has been deleted based on comments received from report reviewers, including yourself. The Salsipuedes Street extension will be partially funded by the project applicants as a mitigation measure required by this EIR. This statement regarding the funding of traffic improvements has been stricken from the text.

15-107 Comment acknowledged; no response necessary.

15-108 Comment acknowledged; According to John Russell of the City Parks and Recreation Department, a skateboard park is not more appropriate for this site than what is proposed.

15-109 Comment acknowledged; no response necessary.

15-110 Comment acknowledged. As discussed in the text, the air quality impacts associated with the proposed project would also be unavoidably significant for the Alternative Design. While the development of the alternative project design would slightly reduce long-term air emissions, emission levels would still remain above the APCD threshold of 2.5 lbs. per peak hour. For this reason, the numbers assigned in Table XI-1 of the Draft EIR are the same for both the alternative design and the proposed project.

ATTACHMENT 1

OFFICIAL HOTEL GUIDE CLASSIFICATION SYSTEM

DELUXE

Superior Deluxe

An exclusive and expensive luxury hotel, often palatial, offering the highest standards of service, accommodations and facilities -- elegant and luxurious public rooms -- a prestige address -- establishments in this category are among the world's top hotels.

Deluxe

An outstanding property offering many of the same features as Superior Deluxe -- may be less grand and offer more reasonable rates than the Superior Deluxe properties, yet in many instances may be just as satisfactory -- safe to recommend to most discriminating clients.

Moderate Deluxe

Basically a Deluxe hotel, but with qualifications -- in some cases the hotel may be a well-established famous name, depending heavily upon past reputation -- in other cases some accommodations or public areas may not be up to Deluxe standards -- the more contemporary hotels may be heavily marketed to business clients, with fine accommodations and public rooms offering Deluxe standards in comfort, but lacking in atmosphere or personal service -- recommend with caution to fussy clients expecting full Deluxe facilities or much pampering.

FIRST CLASS

Superior First Class

An above average hotel -- may be an exceptionally well-maintained older hotel, more often a superior modern hotel specifically designed for the first class market, with some outstanding features -- accommodations and public areas are expected to be tastefully furnished and very comfortable -- may be a good value, especially if it is a commercial hotel -- may be recommended to average clients and in most cases will satisfy the discriminating ones.

First Class

An average, comfortable hotel with standardized rooms, amenities and public areas -- dependable but usually nothing special -- may have superior executive level or wing -- may be safely recommended to average clients not expecting Deluxe facilities or special services -- should also be satisfactory for better groups.

Limited-Service First Class

A property offering full fist-class quality accommodations, but limited public areas, food service and facilities -- usually moderate in size, the hotel often utilizes a residential scale and architecture and many offer complimentary breakfast and evening cocktails in the lobby or in a small, informal restaurant -- geared to the individual business/pleasure traveler.

Moderate First Class

Basically a First Class establishment, slightly below average -- generally has comfortable, simple accommodations and public areas, though not always kept up to standards -- may be lacking in some features (e.g., restaurant) -- some of the rooms or public areas may tend to be small and functional -- usually suitable for cost-conscious clients, but should not be recommended to the fussy or complaining ones.

TOURIST CLASS

Superior Tourist Class

Primarily a budget property with mostly well-kept, functional accommodations, some up to First Class standards -- public rooms may be limited or non-existent -- often just a place to sleep, but many have some charming or intimate features -- may be a good value -- should satisfy individuals (sometimes even discriminating ones) or groups on a budget.

Tourist Class

Strictly a budget operation with some facilities or features of Superior Tourist Class, but usually no (or very few) First Class accommodations -- should under no circumstances be recommended to fussy or discriminating clients -- should generally be used with caution.

Moderate Tourist Class

Low-budget operations, often quite old and may not be well-kept -- should only be used in a pinch if no others are available -- clients should always be cautioned what to expect.

Source: Reed Travel Group, Official Hotel Guide, 1991.

Comment Letter 16

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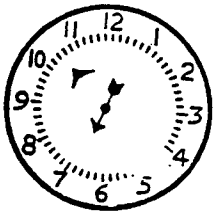

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Project Planner
City of Santa Barbara
Community Development Department
630 Garden Street
Santa Barbara, CA 93102-1990

Re: Santa Barbara School Districts Comments on Waterfront Hotel, Park and Hostel Draft Environmental Impact Report

Dear Ms. Hubbell:

We have reviewed the March 10, 1993 Draft Environmental Impact Report (DEIR) for the Waterfront Park and Hotel and Youth Hostel for potential impacts on schools. We believe there will be impacts on our schools upon approval of the proposed project, and are concerned that schools were not discussed in the DEIR. We offer the following comments and request appropriate mitigation of these impacts be included in the Final EIR.

Background

16-1 The site has been the subject of previous environmental review for similar projects proposed in the past (Santa Barbara Park Plaza, 1979 and Fiesta Park Project, 1988). Review of the Environmental Impact Reports for those projects reveals that school impacts were not addressed in either of these EIR's. Silence on the issue of schools in the previous EIR's does not automatically mean that there are no impacts to address at this time for the newly proposed project. The environmental setting has changed substantially with respect to Santa Barbara schools over the course of time since 1979. This should be reflected in Section IV of the DEIR and should be the subject of detailed discussion in Section VI. Santa Barbara schools once had adequate room for increasing numbers of students, but that is no longer the case.

Overcrowded School Facilities

16-2 The Santa Barbara School District has run out of room to educate its children. To show that this is true, we have appended to this letter a copy of our Report on Feeder Schools and Boundaries for 1993-1997. The report shows that all elementary schools are currently at or near capacity. As you know, of the twelve regular education schools in the City of Santa Barbara, all are over 29 years old and half are over 40 years old. With the exception of Franklin School, they were designed for a maximum of 400 students at the elementary level. The only way the District has been able to expand capacity is to set up portable classrooms. These encroach on play areas, and do not offer the necessary fair share of lab facilities, libraries, cafeterias and food service.

La Cumbre Junior High School is currently underutilized. However, soon this will not be so. Plans have already been made to alleviate some of the existing and anticipated overcrowding in the elementary schools by placing sixth graders there, thus making La Cumbre a middle school.

The potential for Santa Barbara Junior High to become a middle school has been explored, but financial ability to reallocate the proportionate funds away from the elementary school district is not guaranteed.

Definition of Square Footage Subject to School Fees

16-3 Included in the DEIR discussion of school impacts should be a calculation of the mitigation fees that will be assessed on this project pursuant to state law, so that the shortfall

between these fees and the actual impact of the project will be as clear as possible. A precise calculation is not yet possible with the information provided in the DEIR.

1. The hostel will contain a residential unit (manager's living quarters)[1/] which should be assessed at the residential rate. However, the breakdown of square footage for the hostel shown on page 8 of the DEIR (Table III-4) does not distinguish the residential square footage from the commercial square footage of the structure.

2. The size and type of protection, covering or enclosure of the proposed carousel has not been determined. The description in the DEIR reads as follows (Section 1.1 second bullet, page 6):

16-3 cont.

> "The Carousel: A 5,026 square foot carousel (merry-go-round) with a maximum seating capacity of 32 persons. The carousel may be fully or partially enclosed to allow for protection from weather."

Even though the information is not complete, we have made some assumptions in order to demonstrate what the Districts can expect in terms of fees received as opposed to costs incurred for housing additional students. To the hostel unit, we have assigned a residential unit size of 600 square feet, leaving 9162 square feet to be assessed as commercial. For the carousel, we have assumed that the facility will be completely enclosed, and that to do so would require doubling the proposed square footage from 5026 to 10,052. Using these assumptions and the figures shown in Tables III-2, III-3 and III-4, we estimate the school fees will total approximately $47,747.

16-4

The DEIR states (Section X, pages 230 - 232) that the proposed hotel will create a demand for 28 additional housing units (22 affordable plus 6 for management) within the City or close by. Because we have no hard facts to the contrary, we have gone along with the assumption in the DEIR that these will be new houses and will pay new house school mitigation fees. If these houses are not built as part of the project, and if the new hotel employees move into existing housing stock (as often happens today), the schools will get no mitigation fees and the shortfall on page 4 will double.

16-5

Further, the DEIR does not discuss employment needs and residual housing needs for the Park or Hostel. We can expect another small increase when these are taken into consideration. For the purpose of this letter, we have to utilize the figures available in the DEIR, but we request that correct figures be included in the Final EIR.

[1/]Jan Hubbell, telephone consultation, April 4, 1993

Assuming all 28 units are built within the Santa Barbara School Districts, and that the average dwelling unit size will be 1200 square feet, we can estimate that the Districts will receive an additional $89,040 from the construction of these units, for a total of approximately $224,495.

16-6 To learn whether these school fees will adequately mitigate the school impacts of the project, we must look at the student generation factors from the anticipated growth, as well as the actual costs associated with providing school facilities for students. The fee mitigation report prepared for the Santa Barbara School Districts contains school generation factors projected for a five year period , as well as per student costs broken down by elementary, middle and high school facility. Using this information and applying it to the proposed project, we find that even after fees are collected there will be a shortfall of approximately $87,700 from providing basic school facilities for the students generated by this project.

The calculations leading to this conclusion are set forth in the attachment to this letter. By necessity these are rough estimates.

Conclusion and Request for Assistance

16-7 As you know, California courts have confirmed the authority of cities like Santa Barbara to require developers to mitigate school impacts when making early land use decisions. Such mitigation can take the form of donations, dedication of properties, community facilities district programs, or other financing alternatives. These mitigation measures are specifically allowed in addition to the school facilities fee imposed under state law.

Please understand that we are not opposed to this project. However, adequate school facilities are essential to serving the new students generated by new development such as this project.

Student Generation and Per Student Facilities Costs Calculations
(based on latest Districts fee mitigation report)

The information used to calculate the figures in the comment letter was extracted from our CSA Supplemental Report, dated January 15, 1993, page 6, Table showing estimated student generation factors.

We estimated a construction completion date of summer 1994 with students entering the school system in the 1994/95 school year.

SCHOOLS	GENERATION FACTOR	28 HOUSING UNITS	PER STUDENT COST IN $'S	DISTRICT FACILITY COST
K-6	.2	5.6	21,203.00	$118,736.800
7-8	.047	1.316	24,981.00	$32,874.996
9-12	.0845	2.366	28,284.00	$66,919.944
K-6 Spc.*	.0045	0.1125	23,234.00	$2,613.825
9-12 Spc.*	.004	0.112	29,901.00	$3,348.912
TOTALS	.3267	9.5		**$224,494.47**

* Spc. indicates Special Education

School Fee Calculations

CLASSIFICATION	SQUARE FOOTAGE	FEE RATE	FEES COLLECTED
Commercial	170,953	$ .27	$ 46,157.31
Hostel Residence	600	$2.65	$ 1,590.00
28 Res. Units (see discussion on page 3)	33,600	$2.65	$ 89,040.00
TOTAL			**$136,787.31**

District's Costs for Facilities	$224,494.47
School Fees Collected	$136,787.31
Projected Shortfall	$ 87,707.16

We ask that the City include within the Final EIR methods to mitigate our costs for providing school facilities for the students generated by the project. We know you agree that providing an adequate education for the City's youth is a solid investment in the City's future.

Yours sincerely,

Dallas Holmes

Dallas Holmes
of Best, Best & Krieger
Special Counsel
Santa Barbara School Districts

DH/lh
cc: Board of Education
Superintendent
Assistant Superintendent, Business
Fred Clough, Esq.

Response to Comment Letter 16

Note: The enclosures referenced in Comment Letter 16 are on file for public review at the City of Santa Barbara Planning Division. The enclosures have not been included within this EIR as a result of their length and because these enclosures only provide information to support comments already made in the comment letter.

16-1 Comment acknowledged. Inclusion of School Impacts in the EIR - We agree that just because previous EIRs were silent on the school issue, it does not follow that this EIR should be silent on the issue. However, it does not necessarily follow that the impacts on schools are required to be discussed in this EIR because the environmental setting related to schools has changed since the prior EIRs were prepared. Only if this project will result in a significant impact on schools, should there be any discussion in the EIR. The Initial Study prepared for this project concluded that the proposed Waterfront Park, Hotel and Youth Hostel project would not result in significant impacts on schools. The questions asked about potential school impacts in the Initial Study included:

Will the proposal result in:

1. Substantial increase in the number of school children in the attendance area?

2. Aggravation of an existing facilities overcrowding problem?

3. A negative impact on student access routes to or from school property during normal working hours?

City Planning Staff responded "Not Significant" to all of these questions based on the official information available to Staff at that time.

While the reasons for this conclusion were not discussed in the Initial Study, the bases for the conclusion were as follows:

1. By the Santa Barbara School Districts' own calculations, this project will only generate 9.5 elementary and secondary school students, of which about 5.7 will be elementary students. Unlike a residential project which falls into a defined school attendance area, students generated by a commercial project or development could live and attend school in any area of the South Coast (defined as the area from Gaviota to the Rincon). It is quite possible that some or all of the students generated by the project would live outside the boundaries of the Santa Barbara School Districts or attend private schools. It is clear that this project would not result in a "substantial increase in the number of school children in the attendance area" both in terms of total number (less than 10) or in terms of location (scattered).

2. On the surface alone, the addition of 9.5 students does not appear to result in a significant "aggravation of an existing facilities overcrowding problem." Again, the Districts' own projections indicate that, with the recently approved assignment of sixth grade students to La Cumbre Junior High School, only two elementary schools (Cleveland and Peabody) will exceed their capacity in 1997.

The School District has never formally or officially informed the City that conditions of overcrowding exist in one or more school attendance areas. For example, Government Code Section 65971 provides for a public hearing process for official district findings of overcrowding and a method whereby such findings are transmitted to the City, presumably, in part, to allow the City to identify, discuss and perhaps to assist the school district to mitigate such conditions of overcrowding. Although such a process is only required in connection with the imposition of interim school facility impact fees, it has been in place since 1978 and the Santa Barbara School District has never availed itself of this process.

16-2 Comment acknowledged. Overcrowded School Facilities - See Response to Comment No. 1 for a discussion of why the City does not believe that the School Districts truly have overcrowded school facilities.

We commend the School Districts for transforming La Cumbre Junior High School into a middle school to alleviate capacity problems in some of the elementary schools and encourage the Districts to continue working on other solutions to resolve capacity issues including transforming Santa Barbara Junior High School into a middle school, providing morning and afternoon sessions for kindergartners, scheduling year round school or other creative solutions that may arise.

16-3 Comment acknowledged. Inclusion of School Fees Calculations - If school impacts were included in the EIR, calculations of the projected school fees would be included. However, it must be pointed out that Government Code §65995 limits the amount of fees that can be levied against a development project, including development projects that involve a legislative action such as the Specific Plan Amendment that is part of this project. The City presently collects the maximum set forth by this section of State law for the Districts. In addition, §65996 of the Government Code limits the methods available to mitigate significant environmental effects generated by development projects. Finally, Corona-Norco Unified School District v. City of Corona [17 Cal.Rptr.2d 236 (Cal.App.4 Dist. 1993)] concluded that, a discussion of potential school impacts in an EIR is precluded because the "City did not have [a] duty, in conducting California Environmental Quality Act (CEQA) review of proposed ... developments, to impose conditions in addition to [the] school facilities fee, [or] to lessen alleged impacts on development projects on local school facilities, in view of [a] statute precluding [a] local agency from denying approval of development project under CEQA ... on [the] basis of inadequate school facilities." Although this case applied to an administrative action, the recent amendment of Section 65996 to include legislative actions makes it clear that the State preemption of this field is all-inclusive. The applicants have indicated that school impacts will be mitigated through school impact fees paid at the time building permits are issued, as is noted in comment 9-14.

16-4 Comment acknowledged. Construction of Low and Moderate Income Housing - The low and moderate income housing generated by the project may not be built as part of the project. At the very least, the developer will pay in lieu fees for the purpose of providing this housing in the future.

16-5 Comment acknowledged. Inclusion of Park and Hostel Generated Employees and Housing - The Growth Inducement Section has been revised to include employment and housing generated by the proposed hostel and park.

16-6 Comment acknowledged. Fee Shortfall - See Response to Comment No. 3.

16-7 Comment acknowledged. Authority to Mitigate School Impacts - If this project would result in significant impacts on schools, there might be a need to consider the remedies outlined in Government Code §65996 (for example, the district could consider the creation of Mello-Roos Community Facility Assessment District), in addition to the school impact fees already required if the project is constructed. However, as discussed above, the City concluded during the Initial Study phase of this project that there would be no significant impacts on schools as a result of the project.

ENVIRONMENTAL DEFENSE CENTER

Comment Letter 17

April 16, 1993

Environmental Review Committee
City of Santa Barbara
De La Guerra Plaza
Santa Barbara, CA 93101

Re: Draft Environmental Impact Report for the Waterfront Park and Hotel and Youth Hostel Project

Dear Committee Members,

17-1 The Environmental Defense Center has participated with the East Beach Planning Committee in its review of the proposed Waterfront Park/Hotel/Hostel project. The Committee's primary concern with the project is that the proposed development violates the City's Local Coastal Plan (LCP) and Specific Plan policies for the subject property. As you may recall, when the Specific Plan for the Red Lion Inn was adopted, this portion of the SP site was designated for mitigation of many of the impacts generated by the development of the Red Lion.

17-2 Specifically, the mitigation program included open space, a park, a youth hostel, and an express prohibition against any further hotel development on the site. Any remaining development was to be visitor-serving commercial, to serve the current waterfront hotel businesses. Residential development was allowed as a secondary use. Under no circumstances, however, was further hotel development permitted. (See attached Conditions and Findings for the Specific Plan.)

17-3 We have implored the City to consider development which would be consistent with the Specific Plan that was approved by the City and ratified by the voters in 1981. In an effort to identify potential projects, we held two public workshops during the Fall of 1991. At these workshops, we solicited input from the community regarding the types of development they preferred for this site. This input was provided to the City's planning staff for consideration as alternative projects to be included in the EIR. (See attached list.)

17-4 The alternatives analysis in the DEIR is woefully inadequate. Instead of providing a reasonable range of alternatives capable of either eliminating or reducing significant adverse environmental impacts, as required by the California Environmental Quality Act ("CEQA"), the DEIR evaluates alternatives which would, in several instances, increase the environmental impacts of the project.

17-5 For example, Alternative #3 ("Alternative Use Allowed Under the Specific Plan") consists of a project which was already rejected by the City in 1987 because of the gravity of

906 GARDEN STREET, SUITE 2, SANTA BARBARA, CA 93101
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17-5 cont the potential impacts! Inclusion of this alternative in the DEIR violates CEQA because it is not capable of eliminating or reducing the project's significant adverse environmental effects, and because this fact was known prior to the analysis of the alternative in the EIR. (See Public Resources Code Sections 21002, 21081(a); CEQA Guidelines Sections 15002(a)(3), 15021(a)(2), and 15091(a)(1).) It is inappropriate -- in fact it is a violation of CEQA -- for an agency to deliberately choose to include in an EIR an alternative which is known to be more environmentally damaging than the proposed alternative. Accordingly, the City must delete Alternative #3 and replace it with a project description which is both consistent with the Specific Plan and which would eliminate or reduce project-generated impacts.

One such proposal was presented by John Cahill in 1989 at a forum at the Gildea Resource Center. According to the attached summary of Mr. Cahill's presentation,

> "The new schematic placed parking below the commercial developments. Grading would be minimized and create the effect of subterranean parking. Furthermore, the development would be placed at the rear of the site, creating 5 acres of open space suitable for recreational use. An architectural style that emphasized sheltered outdoor spaces, courtyards, and outdoor eating and market areas was featured.

17-6

> "Mr. Cahill emphasized that while the previous proposals were stand-alone developments planned primarily for visitor uses, the new schematic would rely on year-round resident use, and, to be successful, would have to interact with on-site and nearly recreational activities. Mr. Cahill stated that his experience with other coastal projects led him to believe that an interactive project was both more successful financially, and more beneficial to the community than the types of projects that had been planned before."

Clearly, commercial development, designed for both visitor and residential use, is feasible and should be considered for the site. However, it is important that the DEIR select an alternative project which is truly capable of reducing or eliminating project impacts.

17-7 Similarly, the Alternative Project Design (Alternative #2) "would not necessarily result in significantly reduced environmental impacts." (DEIR, p. 235.) Instead of evaluating a reduced project alternative which would reduce project impacts, the DEIR addresses an alternative too large to significantly reduce project impacts, allegedly based upon economic feasibility considerations. For example, the DEIR points out that the hotel would have to be reduced to 80 rooms to adequately mitigate air quality impacts. And yet the alternative analyzed in the DEIR would allow development of 125 rooms.

17-8 There is no evidence in the DEIR that an 80-room hotel would be economically infeasible. Under CEQA, a project alternative may not be rejected unless there is "substantial evidence in the record" to demonstrate that it is economically infeasible. "The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible." Citizens for Goleta Valley v. County of Santa Barbara (1988) 197 Cal.App.3d 1167, 1181, 243 Cal.Rptr. 339.

17-9 Thus, under CEQA, the EIR must examine alternative projects, including reduced-scale projects, which will reduce or eliminate the project's environmental impacts. The economic feasibility of the alternative will then be considered by the lead agency, based upon evidence in the record presented during its consideration of the project.

17-10 The DEIR also states that a larger hotel project is necessary to support the youth hostel. This statement is patently false. The youth hostel is a mitigation measure of the *Red Lion Inn*, and should be supported by revenue from the Red Lion Inn. The hostel was supposed to be developed within two years after the beginning of occupancy of the Red Lion Inn, regardless of whether the remainder of the Specific Plan site was developed.

17-11 Finally, the DEIR misrepresents the Plazuela Alternative suggested by the East Beach Planning Committee. For one thing, this alternative does not require purchase by the City. The Plazuela Alternative is consistent with the City's LCP and Specific Plan for the proposed site; therefore, it is entirely within the parameters of the developer's reasonable expectations for development of the property. Imagine the precedent that would be set if the City takes the position that it must acquire property to ensure that it is developed consistent with the City's own policies!

17-12 Furthermore, the DEIR again evaluates an alternative design which would generate significant impacts. The DEIR should be revised to identify a Plazuela project which would reduce or eliminate environmental impacts at the site.

17-13 In conclusion, the DEIR should be revised to evaluate alternative projects which (1) are consistent with the Specific Plan and LCP designations for the site, and (2) would reduce or eliminate project impacts.

Thank you for your consideration of these comments.

Sincerely,

Linda Krop
Staff Attorney

encs

Response to Comment Letter 17

Note: The reviewer is directed to comment letter 23 which addresses many of the comments stated in this letter. The enclosures referenced in Comment Letter 17 are on file for public review at the City of Santa Barbara's Community Development Department offices. The enclosures have not been included within this EIR as a result of their length and because these enclosures only provide information to support comments already made in the comment letter.

17-1 Comment acknowledged. As part of the proposed project, the Specific Plan would be amended which would make the project consistent with the Specific Plan. Additionally, the reviewer is referred to the revised Alternatives section which now incorporates a project alternative that is consistent with the Specific Plan and the LCP.

17-2 Comment acknowledged. The reviewer is correct; the original Specific Plan does not allow hotel development on Parcel B. However, as described in the Project Description and throughout the EIR, the proposed project includes a Specific Plan Amendment to allow hotel development on Parcel B.

17-3 Comment acknowledged. Reviewer is referred to the revised Alternatives Section which now includes an Alternative which would be consistent with both the Specific Plan and the LCP and would not result in any Class I, significant, unavoidable environmental impacts.

17-4 Comment acknowledged. See response to comment 17-3. The Alternative Uses Allowed under the Specific Plan alternative was included for informational purposes only. This discussion has been moved to the "Alternatives Previously Considered" section. It should be noted, however, that the DEIR does address alternatives which serve to reduce environmental impacts of the proposed project. Both the No Project and the Alternative Project Design alternatives would serve to reduce environmental impacts of the development.

17-5 Comment acknowledged. See above response; see revised Alternatives Section which now presents an alternative project which serves to reduce all significant impacts and is consistent with the Specific Plan and LCP.

17-6 Comment acknowledged. See above responses; see revised Alternatives Section.

17-7 Comment acknowledged. The Alternative Design project would result in less impacts than the proposed project, but would still result in Class I, unavoidable impacts. The reviewer is referred to the revised Alternatives Section which has been revised to include additional discussion of these points.

17-8 Comment acknowledged. The reviewer is referred to the Economic and Fiscal Report on the Waterfront Park Hotel prepared by ERA which is on file with the City Community Development Department. In the ERA report, there is concrete substantiation that an 80 room hotel would not be economically feasible. The ERA report concluded that a 125-room hotel would be the minimum size for an economically viable project. Also see response to comment 15-94.

17-9 See comments above; see revised Alternatives Section.

17-10 Comment acknowledged. The statement has been stricken from the text. However, it should be noted that the youth hostel is only required if the applicant develops in excess of 2.0 acres of commercial land. The statement referenced was made because the applicant is only responsible for a hostel if he develops over 2.0 acres of commercial land. The reviewer is referred to the specific language contained in the Coastal Commission's conditions of approval of the Specific Plan.

17-11 Comment acknowledged; please see revised text. It should be noted that the Plazuela concept would not be unlike previously denied projects in that the retail and restaurant components would have to be linear in nature, fronting along Cabrillo Boulevard. These types of uses in this location have been rejected by the public in the past on the Fiesta Park Project..

17-12 Comment acknowledged; see revised discussion under the Plazuela Alternative under the new section entitled "Alternatives Previously Considered". Another alternative that is both consistent with the Specific Plan and Local Coastal Plan has been added and may include elements of the Plazuela concept.

17-13 Comment acknowledged; please see revised text.

BEACHSIDE MERCHANT'S ASSOCIATION
P.O. Box 755 • Santa Barbara, Ca. 93102

Comment Letter 18

April 15, 1993

Environmental Review Committee
Planning Division
630 Garden Street
Santa Barbara, California 93102
Attention: Janice M. Hubbell, Project Planner

Re: Waterfront Park and Hotel and Youth Hostel

Dear Committee Members:

At our March meeting of the Beachside Merchants Association, it was unanimously agreed that the use of the site at the corner of Chapala and Montecito Streets directly across (east) from the City's historic Moreton Bay Fig Tree for a hostel site would be a serious mistake and should not be permitted.

18-1 It is essential to the long-term best interests of Santa Barbara that its railroad station have adjacent or as near as possible to it adequate parking for cars, buses, rental cars, visitors, taxi cabs, etc., not only for current needs but for the obvious greater future needs. While it might be nice for the hostel site to be near the railroad station, that is not nearly as important to all of Santa Barbara as it is to have land adjacent to the railroad station for the uses mentioned above.

18-2 It has been suggested that if the City needs parking in the future, a structure be built. That simply is nonsense. Even if a parking structure were needed in the future, that very land is probably where you would want to put it. All the undeveloped land in and around the railroad station should be preserved for the future uses of the railroad.

18-3 The market for Santa Barbara is Southern California. Travel to Santa Barbara by air and automobile is becoming more difficult and congested as time goes on. In the coming years, rail transportation in and out of our city will become more vital. If the railroad site in Santa Barbara becomes inadequate, then a future site will probably have to be developed in Goleta. That is the history of airports which have permitted adjacent development that chokes off and impedes the proper use of the transportation facility.

18-3 cont. The Beachside Merchants Association implores this Committee to look at the adverse environmental consequences to the community by allowing vitally-needed adjacent land to be utilized for construction of the proposed hostel by the Fess Parker project. Surely there are other sites if that hostel is a necessary ingredient for the hotel development, including land currently owned by the Parker Family Trust.

Very truly yours,

Antonio R. Romasanta

ANTONIO R. ROMASANTA

ARR/abs

cc: Mayor and Council Members

Response to Comment Letter 18

18-1 Comment acknowledged; no response necessary.

18-2 Comment acknowledged. The Redevelopment Agency of the City of Santa Barbara is presently developing plans for the revitalization of the Santa Barbara Railway Station. That planning effort is separate from the proposed project. However, it does consider the short- and long-term parking needs of the planned uses for the area.

18-3 Comment acknowledged. The Alternatives section addresses the issue of alternative sites for a youth hostel.

April 26, 1993

City of Santa Barbara
Planning Division
630 Garden St.
Santa Barbara, Ca., 93102

RECEIVED
Comment Letter 19
APR 27 1993
CITY OF SANTA BARBARA
PLANNING DIVISION

The Santa Barbara Arts and Crafts Show (SBACS) would like to take this opportunnity to respond to the Draft Environmetal Impact Report for the Waterfront Park and Hotel and Youth Hostel Project prepared by Interface Planning and Counseling Corporation dated March 10, 1993. Because of the proximity of our show to this proposed project, and the negative effects we experienced from the construction of the Red Lion Hotel, we would like to discuss possible negative impacts which might result to our show from this proposed project.

A. Introduction and Background.

The Santa Barbara Arts and Crafts Show is located on the south side of Cabrillo Blvd. approximately 100 ft. from the proposed site. It begins at State St., and extends eastward just past Salsipuedes St. We are free to the public and exhibitors pay an annual permit fee which raises a significant amount of money for the City of Santa Barbara. We exhibit every Sunday year round plus major holidays. The SBACS was created by the initiative process and voted into ordinance in 1973 and is governed jointly by a city advisory board which is comprised of show members, city staff and a member-at-large. We require that all work sold be created solely by the exhibitor who must be in attendance at that time. The show had existed informally before 1973 and we are currently in our 27th year.

Located on the tidelands of the State of California, we are administered by the Parks and Recreation Department but are affected and guided by state and local coastal plans. We are able to provide a low cost tourist serving rescource for this coastal community which is supported by coastal plan policies. Our present location encourages pedestrian usage of the south side of Cabrillo Blvd. and due to our linear format, visitors to the show tend to linger through two meals thus creating a thriving Sunday business for the waterfront shops and restaurants. The SBACS is a valuable community and coastal rescource and is responsible for the generation of a significant portion of the tourist dollar into the city's economy. The California Coastal Commision encourages communities to maintain and create low cost businesses to service and attract the tourist within coastal boundries. Our weekend show provides a focal point to the tourist and encourages both weekend stays and daytrips to the community and serves to make Santa Barbara a unique coastal community.

19-1

As a valuable tourist and community rescource, the SBACS needs protection and assistance throughout projects such as the Waterfront Project or revisions of the Harbor Master Plans and during questions or revisions of local policies, whereby projects or their impacts may have serious negative physical or economic effects on the SBACS. Local coastal plan policy 4.3 provides for the protection of our show: "Public amenities which provide unique lower cost visitor serving experieces, such as the Arts and Crafts Show, ...and any other special uses shall be protected."

B. Impacts of the Draft EIR.

Aspects of the draft EIR which affect us directly are on pp. 42-45, and p.48. These concern local coastal plan policies. Local coastal plan policy 3.8 addresses the relocation of the SBACS to alternative sites. Traffic, parking and project construction will also have sigificant impacts on our show. The potential negative effects of this proposed project are as follows:

1. Relocation of the SBACS. (Long term).
2. Loss of on-site exhibitor parking. (Short and long term).
3. Traffic. (Short and long term).
4. Construction impacts. (Short term).
5. Economic loss. (Short term).

1. Relocation of the SBACS.

Policy 3.8 of the last City of Santa Barbara local coastal plan calls for the relocation of the SBACS should suitable sites become available. The numerous opportunities for public input as well as the input of show members have strongly indicated there be no incorporation of the SBACS into this new proposed park. Although the existing plan does not call for this relocation, the key words are "at this time.": (p.44). Any relocation of this show would destroy it and and a lack of public support justifies that position. "The proposed project does not preclude relocation of the Arts and Craft Show to the public portion of the project site. Thererfore, the project appears to be potentially consistent with this policy. However, the project as proposed does not anticipate or provide for such a relocation at this time." (p.44)

19-2

2. Parking.

This combined project creates a serious demand for public parking. Although this draft EIR addresses this problem, it is our concern that Sunday parking along the portion of Cabrillo Blvd. parallel to exhibitors will be lost in the short term due to construction and permanantly due to the possible red-lining of Cabrillo Blvd. for either the creation of a left-hand turn lane or visual access. This has already happened where a left-had turn lane for the Salsipuedes St. entrance was constructed and has caused the easterly portion of our show serious hardship. Within the rules which govern the SBACS, we have made sure to provide requirements for the visual and physical access to the beachfront area and these are in accordance with the goals of our local and state coastal plans.

Permanant loss of exhibitor parking should be avoided at all costs due to the reasons listed below. Loss of parking for cosmetic reasons which override the needs for public safety should be ignored. However, should there be a short term loss of parking which cannot be avoided, alternative parking in a proximal inland site should be provided. Sunday exhibitor parking should not be jepordized due to the increased demand which this project will create.

19-3

Parking along Cabrillo Blvd. provides show members a necessary safety barrier and buffer zone for protection from weather, noise, dust, and most importantly ongoing traffic. Daylong parking for exhibitors prevents the attempts of passing traffic to park along Cabrillo Blvd. in 40mph traffic for purposes of loading or unloading. Should parking along Cabrillo Blvd. be removed the potential for accidents becomes extremely high during peak weekend levels of traffic and is not a risk which show members are willing to take.

In addition to the above safety hazards, should show members be required to park offsite, we would incur significant safety hazards in our attempts to load and unload weekly, undue hardship during inclement weather, significant security problems for the protection of our handicrafts and the safety of our children. Offsite parking would also place a significant burden upon the elderly, the handicapped, and those showmembers with children.

3. Traffic.

This project may have a significant short term effect on the flow of traffic on Cabrillo Blvd. along with the possible rerouting of traffic to alternative roads which may cause poor show access and attendance. Should this occur we ask that signs be installed in many locations and every effort be made to direct traffic to and inform the tourist of the open waterfront area and the Arts and Crafts Show.

19-4

4. Construction Mitigation.

We are especially concered about the control of dirt created by this project. During the construcion of the Red Lion, we experienced a severe dust storm created by uncontrolled dirt which was so thick it shut down both the lower half of the show and passing traffic. Unsightly areas should be concealed or fenced off and relief should be provided to show members should show dates be lost due to construction impacts. The draft EIR seems to provide adequately for construction impacts, but there would be an unavoidable conflict of interest should mitigation measures not be followed or enforced or should construction occur on Sundays, which appears unlikely.

19-5

Every effort should be make to avoid a left-hand turn lane in the eastbound direction of Cabrillo Blvd.
19-6 Vehicular access if any into the central portion of the park from Cabrillo Blvd. should be from the west-bound direction only for safety purposes during heavy weeked traffic.

5. Economic Impacts.

The short-term impacts of construction will have the potential to cause a significant loss of business to the waterfront area due to traffic rerouting and avoidance of the area during construction. All mitigating measures such as those mentioned above should be implemented to negate the detrimental effects of project construction with regards to our show and the entire waterfront business community.

19-7 Although it is anticipated that this project will have a positive economic impact on the community, there are certain to be short-term losses during construction. As we are dependent on a tourist-based industry, we suffer during economic downswings and the unavoidable affects of inclement weather and the extremes of events such as El Nino, severe drought or fire. Should irresponsible behavior during construction cause the show harm, that would also have a negative economic impact on the show and the local tourist industry as well, and should be avoided at all costs.

C. Conclusion

As a low-cost tourist serving rescource, the success of our show is dependent on the fact that we have created a history at our present location. This history includes both location and on-site parking. The quality and uniquness of our show which has made it such a success stands to be jepordized by construction impacts and the potential policy changes this project might bring.

19-8 The SBACS looks forward to the development of a park or habitat improvement on the currently denuded park site, but would find it difficult to support a plan which by oversight may not provide for or protect the longevity and survival of our show. We hope that the city of Santa Barbara, the Parker Family Trust and the Redevelopment Agency will work with us towards that goal so we can have a project which benefits the entire community.

I thank you for your time, and look forward to answering any questions or correspondence which you may have in regards to our show.

Sincerely,

Marilyn Loperfido
Chairperson,
Santa Barbara Arts and Crafts Show Advisory Board

Response to Comment Letter 19

19-1 Comment acknowledged; no response necessary.

19-2 As is stated in this comment, the proposed project does not include the relocation of the Arts and Crafts and there is currently no proposal to relocate it.

19-3 As indicated in the EIR, the Park portion of the project will have a parking deficit until the Garden Street extension results in additional parking. The project does not recommend a left-turn lane along Cabrillo which would result in curb parking removal. Please see text revisions relative to these two issues.

19-4 The EIR (pages 106-107) recommends a truck routing plan and local construction traffic control measures to mitigate construction traffic.

19-5 A mitigation measure contained in Section VI. E., Noise and Vibration, requires that construction be prohibited on weekends and on nationally recognized holidays. In addition, mitigation measures contained in Section VI.B, Air Quality, require dust-generation to be kept to a minimum by several dust control measures, which include a designated person to monitor the dust control program during construction and on weekends and holidays when construction is not allowed. All mitigation measures that are required by this EIR would have to be enforced and their implementation monitored if the project is approved. In addition, the SBACS will be provided the name and number of the dust control program monitor, which will enable the SBACS to make contact in the event that dust control becomes a problem. Therefore, construction impacts to the Arts and Crafts Show relative to dust generation should be less than significant.

19-6 As is noted in comment 5-2 by Wayne Schnell of CalTrans, the auto entrances in the middle of the complex on Cabrillo Boulevard should be signed, striped and constructed to only allow right turns in and out. There is an existing left-turn lane from Cabrillo to Salsipuedes Street which would not be altered as part of this project.

19-7 Comment acknowledged; please see revised text. The Santa Barbara Arts and Crafts Show (SBACS) is recognized as a valuable resource to the City of Santa Barbara's visitor industry. Given the close proximity of the proposed hotel to the SBACS, attendance at the show is expected to increase substantially over the long-term. Regarding short-term impacts from construction, SBACS should be reassured that every effort will be made to mitigate the negative impacts of construction as outlined in the DEIR. Since construction is unlikely to occur on Sundays when the show is being held, chances of business loss are reduced significantly.

19-8 Comment acknowledged; please see responses to comments 19-2 and 19-5 above.

Comment Letter 20

CREIG ALAN DOLGE
Attorney at Law

100 E. DE LA GUERRA
P.O. BOX 637
SANTA BARBARA, CA 93102
TELEPHONE (805) 963-1994

April 26, 1993

RECEIVED

APR 26 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

Environmental Review Committee
for the City of Santa Barbara,
Planning Division
630 Garden Street
Santa Barbara, CA 93102

Attn: Janice M. Hubbell, Project Planner

RE: Comments on the draft Environmental Impact Report on the Waterfront Park and Hotel and Youth Hostel

Dear Ms. Hubbell:

Citizens Planning Association, South Coast Land Use Committee makes the following comments with regard to the draft Environmental Impact Report for the Parker Waterfront Park and Hotel and Youth Hostel project.

20-1 First, with regard to traffic, the draft Environmental Impact Report does not mention in its analysis the current proposal by Cal Trans to widen the freeway and make improvements at some of the intersections from Milpas Street south through Montecito and beyond. A draft EIR is currently being circulated for this project. The proposed alternatives in the Cal Trans proposal could significantly change the analysis of traffic impacts stated in the Waterfront Park and Hotel EIR, specifically as to the intersection of 101 and Milpas, and the intersection of Cabrillo and 101.

20-2 There is also some mention in the alternative section that the City does not have the funds on its own to do necessary improvements to Garden Street, Salsipuedes, and other intersections. However, this EIR does not mention the availability of Measure D funds for these purposes. This issue should be addressed in the EIR.

20-3 In the economic analysis, the EIR mentions the potential impact on higher quality hotels (section 3.1 pp. 218), such as the Biltmore and the Red Lion. However, the EIR does not mention what impact this project would have on the Hyatt Hotel Destination Resort project which has been

cont. approved by the County for the area just north of Winchester Canyon Road. The EIR should address any potential impacts when the Hyatt Hotel project is completed.

20-4 With regard to the alternatives, although a scaled down hotel alternative is reviewed, there is no attempt to look at a scaled down Plazuela Concept, or a scaled down specific plan alternative. In order to be complete, the alternative section should look at these additional possibilities. In addition, a much smaller hotel, such as an 80 room hotel or an all suites hotel concept should be analyzed for its potential to reduce significant impacts.

20-5 The statement on pp. 245 that a commercial retail concept such as the Plazuela would require the City of Santa Barbara to buy the property and develop it itself is not substantiated with any factual material found in the EIR. It appears, that this concept may be taken from the economic analysis done in December of 1992 with regard to this project. In the economic analysis, the consultants stated that such a project would have a negative cash flow and could not be maintained by the property owner. However, it is unclear as to why the consultants for the economic analysis felt that a retail/commercial project would result in negative cash flow to the property owner. The reasoning behind these conclusions needs to be included in the EIR so as to provide complete information.

Finally, we strongly support the use of offsite mitigations for air quality impacts generated by this site, as endorsed by the APCD.

Thank you for this opportunity to comment on the EIR.

Very truly yours,

CREIG ALAN DOLGE
Member of South Coast Land Use Committee

CAD/slm
word5/letters

Response to Comment Letter 20

20-1 It is recognized that an EIR is being prepared for the freeway widening. It is also noted that the freeway project will include modifications at both the Milpas/101 and Cabrillo/101 interchanges. However, the plans are preliminary and it would be tenuous to identify the specific effects of these changes. In addition, there is no discussion of the Milpas/U.S. Highway 101 interchange in the Caltrans Draft EIR/EIS and the EIR/EIS contains no information on the projected changes in LOS at the Cabrillo/U.S. Highway 101 interchange.

20-2 Comment acknowledged; please see revised text.

20-3 Considering the distance between the Hyatt Hotel project and the proposed Waterfront hotel, coupled with the uncertainty associated with construction of the Hyatt Hotel, it would be extremely speculative to assess the impacts of the proposed project on the Hyatt Hotel project.

20-4 Comment acknowledged. See responses 17-1 through 17-8.

20-5 Comment acknowledged. The text has been revised to address the issue raised by this reviewer.

Comment Letter 21

GILDEA RESOURCE CENTER
COMMUNITY ENVIRONMENTAL COUNCIL

April 26, 1993

RECEIVED

APR 26 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

Ms. Janice Hubbell, Project Planner
City of Santa Barbara
630 Garden Street
Santa Barbara, CA 93102

Dear Ms. Hubbell,

The Community Environmental Council (CEC) has a long history of participating in the development process with the waterfront park and hotel. Because of the importance of the development of the last piece of ocean front property, this organization is committed to continue its participation.

We applaud the City for moving ahead with the park design. The effort is long overdue. The design process now provides the community with a framework for a final design effort. However, we feel compelled to comment on the Draft Environmental Impact Report (EIR) which appears deficient in many ways. We offer these comments on behalf of the CEC and its Board of Directors.

21-1 We have three concerns with the current EIR, the first of which has to do with the selection of project alternatives. In December 1989 at a seminar held at CEC, a representative of the Parker Family Trust, Mr. Cahill, presented a development concept predicated on year-round residential and tourist commercial activity, with interaction between the development and the adjacent park as a critical component of its success. The concept included underground parking servicing a "pueblo-style" architecture to maximize space available for park use and reduce visual impacts of the project. This was presented as the project of choice of the developer at that time and it attracted a great deal of interest. We believe that it should be included as a project alternative as it is consistent with the parcel's specific plan provisions.

21-2 Second, we believe the EIR must distinguish between mitigation measures required by the development of the Red Lion Inn, and those required by this new development. We are concerned that measures for the Red Lion Inn, are being "double counted" and presented as mitigations for the new development. The blurring of mitigations should be avoided in all subsequent presentations.

21-3 Finally, it is our primary concern that the proposed park space be devoted to active residential use as has been envisioned since the initial development process of the Red Lion Inn. The existing plan fails to meet these needs. Of particular concern is "The Great Meadow," whose distance from adequate parking and proximity to the hotel almost guarantees that the space will become a quiet buffer for the planned

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cont. hotel. Any use of the park as buffering for the hotel compromises the public space and is inconsistent with the mitigations imposed on the site as a condition of the Red Lion Inn approval.

21-4 We believe that the Alternative Park Programming section of the EIR gives only cursory attention to the needs of active community-use park space, especially Santa Barbara's teen-age and minority communities. Why, for instance, is the alternative active park programming in the EIR limited to the space dedicated to the existing carrousel? We suggest that an expanded public input process targeted at determining the recreational and social needs of the community's teenagers and minority community would yield important insight for the final park design.

Thank you for your consideration.

Sincerely,

Jon E. Clark
Executive Director

Response to Comment Letter 21

21-1 Comment acknowledged. An alternative scenario such as the one described in this comment has been added to the Alternatives section and the Economic and Fiscal Impact section.

21-2 Comment acknowledged. No mitigation measures required for the development of the Red Lion Resort have been included in this EIR. The reviewer is referred to Assistant City Attorney Steve Wiley's comments 11-17 and 11-18 in which he states that if there is no development of Parcels B and C of the Park Plaza Specific Plan, then no open space or youth hostel would have to be developed.

21-3 Comment acknowledged. It is assumed that the commentor meant to refer to "active recreational" rather than "active residential" land uses. The Great Meadow area has been planned for both active and passive use. A pavilion and a public address system would be installed so that the area could be used for large gatherings and special events, such as weddings. It is anticipated that this area will be actively used by park visitors, as is reflected in the traffic trips that are expected to be generated by this park component. Some of the park's required parking is being provided off-site in order to maximize the amount of open space available. In addition, the applicants are required to prepare a Transportation Demand Management Program by a mitigation measure contained in the Traffic, Circulation and Parking section of this EIR in order to decrease traffic trips and parking demand. A goal of the park's design is to maximize the amount of usable public open space. In all of the project description information on the park generated by public workshops, staff input, and the applicants, it has never been the intent to use this area as a buffer for the proposed hotel.

21-4 Comment acknowledged. There has been an abundance of public input on the proposed park and the Community Environmental Council has been an active participant in this public process. The proposed park design is the result of comments received at two public workshops. In addition, Joan Russell of the City Parks and Recreation Department has stated that the project site is not the appropriate location for clustering a variety of commercial recreational activities that would appeal to teens. There are several reasons for this opinion. First, recreational activities that appeal to teens are most successful when clustered together (such as miniature golf, batting cages, and a skateboard park). Without clustering, Ms. Russell said it is difficult for recreational purveyors to survive financially. Second, clustering of such uses requires more land than is available on the park site. Third, Ms. Russell said the site was not centrally located which makes access to it by potential teen users more difficult. Fourth, the park site has been designed to serve as a regional park and to provide activities to all segments of society, from young to old. Given that this is the last large vacant parcel in the Waterfront Area, the general feeling is that it would be best suited to serve the general public rather than only one segment of the public. Fifth, the land is or will publicly owned and it would be very expensive for the City to obtain liability insurance for commercial recreational uses. It should be noted that the City Youth Task Force and the City Council are currently analyzing ways to provide additional recreational opportunities to teens.

D A V I D T A B O R & A S S O C I A T E S
Land Use Planning

1326 Kenwood Road Santa Barbara, CA 93109 805/966-3276

Comment Letter 22

April 26, 1993

RECEIVED

APR 26 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

Mrs. Elizabeth Woodward
Environmental Review Committee
City of Santa Barbara
PO Box 1990
Santa Barbara, CA 93102-1990

RE: *Waterfront Park and Hotel and Youth Hostel Project*
Comments on Draft Environmental Impact Report

Thank you for the opportunity to speak at your meeting of April 16. The review of the Staff was very thorough, and I was in agreement with many of the comments made by the Committee. I am presenting these additional comments for consideration in preparing a Final Report.

22-1 I agree with some of the statements made by Committeemember Mohr. In general, the document made several subtle assumptions that gave the impression that the analysis was biased toward the developer. Rather than seeing the park and hostel as the fulfillment of an earlier approved project, these were considered new and were used throughout the document as mitigations for the new hotel. Assumptions are also made that the mitigations will act as planned, which makes a far greater number of policies "Potentially Consistent." Generous assumptions are also given in the area of traffic review which may not reflect the City's policy of considering a "worst-case" scenario.

TRAFFIC

22-2 Page 79 - For the purpose of calculating the existing trips generated by the uses on site, the EIR uses information from the previous EIR. The previous EIR, which is 5 years old, used data that was 5 years old. The amount and type of use on the site 10 years ago was quite higher than today. Since this number is subtracted from the projected new uses to calculate the net new trips from the project, new accurate counts are warranted.

22-3 Page 80 - The 50% adjustment factor for people already in the Waterfront may be justified on the weekend, but it seems high for Friday PM. Vast majority of trips during this busy time are destination trips.

22-4 Page 83 - 1979 WATS study had a much different street system in place. Considering large number of changes since then, WATS study distribution patterns are highly questionable.

22-5 Page 83 - Question distribution percentages in general, and in particular:

Distribution tables should use same streets as a basis.
Only 50% hotel trips freeway bound, while 60% of park trips related to freeway?

cont. How are tourists visiting hotel going to find Garden Street?
SB/Anacapa Streets no longer cross the freeway to get to the park.
It seems that as many people would use Castillo as would use Milpas to get to the park.

22-6 Page 95 - Traffic model puts twice as many trips on Salsipuedes extension as on Garden extension. Industrial nature of Salsipuedes Street, and its resulting condition, would discourage its use over Garden Street. The streets are only 2 blocks apart, and I believe the quality of the ride would be much more important to those wanting to cross the freeway than the short distance between the streets. I think the presumptions are, therefore, wrong in assigning such a high percentage of the diverted trips to Salsipuedes Street.

22-7 Page 99 - PUC approval of an at grade crossing is highly speculative, and it is my understanding that it is difficult to obtain, which is one of the main reasons there has not been a crossing at Salsipuedes in the past. The EIR should treat this prospect as potentially infeasible.

22-8 Page 107 - Parking discussion recognizes the relative lack of parking in the area, states there is some parking displaced, but doesn't seem to acknowledge the responsibility of the project to provide for its projected demand and any potential future demand. With the lack of parking in general in the Waterfront, this discussion should be explored more, along with potential mitigations.

22-9 The discussion dealing with the parking situation at the hotel is inadequate. Vague references to "special events" without defining what this is. The project description should elaborate on what the hotel will provide in addition to the 150 beds for this type of discussion. This also has implications for the traffic calculations. Coastal policies state that sufficient parking should be provided on site to accommodate all the generated parking demand.

22-10 "Surplus parking" at the Red Lion needs to be better defined. It is my understanding that the Red Lion was granted a rather large parking modification when it was approved. Conditions were also placed on its operation governing the amount of special event patronage was allowed. It is also my understanding that the Red Lion has reported to the City that it has exceeded its allowed number of guests on more than one occasion. The Red Lion has also been reported to have applied for approval to allow more guests at their events, putting a greater strain on Coastal Resources. The EIR should avoid getting caught up in this parking "shell game."

AESTHETICS

22-11 Some consideration should be given to the visual state of the site before the extensive brush clearance and tree removal program of the late 80s began. The site was a virtual wall of greenery, literally sticking out into Cabrillo Boulevard. This wall of vegetation was a significant resource in itself, which has been lost due to the clearing of the site by the owner.

cont. Present "poor visual quality" is a direct result of the clearing which revealed the nonconforming industrial uses on the property.

RECREATION

22-12 Page 209 - This is the first time I have heard that there is a glut of park and recreational open space in the Waterfront area! Most accounting considers not only the Waterfront residents, but the people from all over the world who use and recreate in Santa Barbara. The EIR is not consistent with the previous considerations in this regard.

22-13 Also expected to see analysis of projects ability to meet new demand for parks generated by the hotel and new residences to accommodate employees. EIR keeps insisting that the proposed park will offset any new demand. Specific Plan, however, calculates that openspace on Parcels B & C is needed in its entirety to meet the demand generated by development of Parcel A.

ECONOMICS

22-14 Page 218 - Discussion related to the impact on smaller hotel properties contradicts 2 other sources: the Specific Plan Staff Report to the Coastal Commission, and the Santa Barbara Hotel/Tourism Study of 1986.

22-15 it is a normal, characteristic, and traditionally expected economic effect looked forward to by the business community, that a new project will bring benefits to others in the same industry. The Staff Report anticipates the impact of a high-end hotel on low-cost facilities will be significant. The Hotel/Tourism study notes there is a need for a high quality hotel in Santa Barbara, and one reason for the need is the expected shifting it would create throughout the hotel industry. Those hotels that could compete, would do what they needed to do to catch up and raise their rates. Those that couldn't would struggle along and eventually stop operating.

22-16 The EIR again states that the Hostel would more than make up for any negative effect. The CC Staff Report stated that a 200 room low-cost hotel would be needed to offset the upward trend caused by the Red Lion, but conditioned the project to develop a 75 bed hostel. If the new project is to get any credit from the hostel, it should be considerably larger than proposed.

ALTERNATIVES

22-17 Page 235 - Alternative 2.0, a reduced size hotel, notes that the Salsipuedes Street extension alleviates any potential impact from either a 150-room, or a 125-room hotel. The distribution charts in the traffic analysis does not even list Salsipuedes Street under the hotel trip distribution, and other discussion implies that Salsipuedes extension would take local traffic off of Milpas, which has little to do with the proposed hotel.

22-18 Page 236 - The alternative use considered, the previously unanimously DENIED project proposed for this site does not represent a project that is a "reasonable alternative to the project, which could feasibly attain the project objectives..." Indeed, the previous projects were grossly oversized commercial projects, that had little to do with the approved Specific Plan. How they warrant discussion in the alternative analysis is incomprehensible.

22-19 Page 245 - Compared to the DENIED projects previously proposed, the Plazuela alternative is given little consideration. First, the size of the project is inflated beyond a level imagined by those who proposed it. This can be seen in the traffic analysis assigned to the imaginary Plazuela project. The assigned 2,462 Average Daily Trips is 150% greater than the 1700 ADTs that the last denied project on this site generated. Everyone who imagined a Plazuela on this site saw it being smaller than the previous 85,000 sf project.

22-20 Second, it is difficult to guess why the EIR states that the City must purchase the site in order for a project that would be consistent with the Specific Plan to be realized. Why was this not stated when the Specific Plan was approved in 1982? If someone proposes an industrial use in a residential zone, must the City purchase the property to achieve its original zoning? This is a whole new concept in land use law that has far reaching consequences if it is true.

22-21 In the an earlier alternative, serious discussion is given to comparing an enormous commercial development that was previously proposed for this site and denied. Then in this section the Plazuela concept, which is just that, a concept, is dismissed frivolously as being "too dense." A reasonable sized Plazuela, with a mixture of uses, designed in a "village-on-the-green" or Mercado style should be given serious consideration for the buildable portions of Parcels B & C. The commercial uses would compliment and not compete with other retail uses in town, the uses would be consistent with the approved Specific Plan, and would better serve the local residents as well as the tourist economy.

MITIGATIONS

22-22 The EIR treats many of the proposed mitigations as one-time efforts that will automatically ensure compliance in the future once they are in place. I do not believe this to be so, based on a UCSB class project several years ago which looked at the implementation of the Red Lion Inn conditions of approval. Many items, such as the parking agreement and the TDM program, may need to consider techniques beyond merely reviewing a plan, such as enforcement mechanisms, to ensure compliance.

Thank you for your consideration of these comments. I am looking forward to seeing the Final Environmental Impact Report for this project.

Sincerely,

David Tabor AICP

Response to Comment Letter 22

22-1 Comment acknowledged. The report preparers have used their best efforts to prepare a complete, accurate and objective EIR within the statutory language of the California Environmental Quality Act as amended. Assumptions are made throughout the report that mitigations proposed by the report will be adopted as conditions of approval, and carried out if the project is approved and constructed. The purpose of the Mitigation Monitoring Framework provided as a part of the EIR is to guarantee that these mitigations are, in fact, implemented.

The park and hostel are requirements of the Park Plaza Specific Plan and the Coastal Commission's Conditions of Approval, and are not requirements tied to development of the Red Lion Resort. The reviewer is referred to Assistant City Attorney Steve Wiley's comment 11-18 in which he states that if Parcels B and C are not developed, then open space and the hostel do not need to be developed. Traffic assumptions are generally consistent with actual findings from operation of the Red Lion or with those used in the Fiesta Park EIR.

22-2 Recent counts for the existing site are actually somewhat higher. However, these counts apparently include illegal public parking and it was determined that use of the lower prior counts would be more conservative.

22-3 All of the secondary trip factors, trip generation rates and traffic distribution factors were discussed at length with City Planning and Transportation staff. It should be noted that where street network changes have been made, distribution factors have been adjusted somewhat to account for those most convenient route now available. While the Waterfront Area Transportation Study (WATS) established baseline distributions, these have been updated to reflect current and projected conditions.

22-4 Please see response to comment 22-3.

22-5 Please see response to comment 22-3.

22-6 The City traffic model output was reviewed with City Transportation staff and it was determined that the model projected traffic shifts were reasonable.

22-7 The EIR section in reference assumed that a new at-grade railroad crossing would be constructed. The EIR authors are not able to determine the feasibility of P.U.C. approval. In the past, Southern Pacific Railroad officials were concerned about the proposed crossing. They have since indicated their support for the at-grade railroad crossing.

22-8 The EIR does acknowledge that the Park component of the project would not have sufficient parking. As noted in various text changes, the Garden Street extension would result in additional parking which would meet the calculated demand for the Park in the long-term.

22-9 The calculated demand for Hotel parking assumes full occupancy of the rooms plus a large meeting or wedding reception with no overlap between hotel guests and meeting/reception attendees. With these conservative assumptions, there could be a 57-97 space deficit. However, surplus parking in the Red Lion Hotel lot would have to be available (see EIR mitigation section). Daily parking

counts at the Red Lion Resort have indicated that adequate parking is available to provide parking for the proposed hotel's special events unless special events are also held at the Red Lion Resort. See the Initial Study prepared for the proposed Conference Facility Use expansion for the Red Lion Resort for additional information.

22-10 Please see response to comment 22-9.

22-11 Comment acknowledged. As mentioned in the Archaeological Resources and Historical Resources sections of this Environmental Impact Report, the park and hotel site has been occupied by a wide range of land uses over the last century, which has ultimately resulted in several different visual conditions. Because the visual condition of the site in the late 1980s or any other era no longer exists, it is neither appropriate or applicable to assess the previous visual condition of the site. In most instances, it is the industry standard when preparing an aesthetic analysis to assess the existing visual condition and not the previous visual condition of the project site, regardless of how the site evolved into its present visual condition. Therefore, the assessment of project site's visual condition in the late 1980s would not provide an accurate analysis of potential visual impacts.

22-12 Comment acknowledged; the text has been modified to reflect more focus on the community nature of the Waterfront Area parks. The discussion in the text was focused on a comparison of the amount of park land in the City. When assessed in this context, the Waterfront Area definitely has more park land than other portions of the community.

22-13 Comment acknowledged. As described throughout the EIR, the development on Parcel B is expected to bring approximately 30 new people to the area. The impact analysis does assess the amount of park space that 30 persons would need, according to The City Parks and Recreation Department methods for calculating park land/person. Again, given the amount of park land in the Waterfront Area, the added park land, and the demand created by 30 new people, the project would not result in significant recreation impacts.

22-14 Comment acknowledged. See response to comment 22-15 immediately below.

22-15 Comment acknowledged. The report preparers are unclear as to what specific contradiction the commentator refers, due to the fact that no specific reference to the "Staff Report" is provided. If the reviewer is concerned that the proposed luxury hotel will cause a general upgrading of lower cost facilities due to competition from a luxury hotel, this conclusion may be flawed in that the proposed project is not intended to compete with low or middle range hotels or motels. It is designed to meet the upper high-end luxury hotel market, of which there are no equivalent hotels in the City of Santa Barbara Waterfront Area. It would be speculative to assume that lower cost facilities would expend considerable sums of money to upgrade their facilities to compete with a luxury hotel with amenities which are far removed on the basis of room rates. The reviewer is accurate in observing that competition among like facilities would tend to foster improvements in general. However, this effect does not appear to be related to the addition of a luxury hotel which seeks to address a market which does not presently exist in Santa Barbara. For additional information, the reader is referred to the full text of the economic report on file with the City of Santa Barbara Community Development Department.

22-16 Comment acknowledged. The Coastal Commission's conditions of approval gave the developer of parcel A three alternatives with respect to the youth hostel. Two of the alternatives were to develop a 75-bed hostel within two years. However, the developer complied with the Coastal

Commission's third alternative by posting a bond for the provision of engineering plans for a hostel. The reviewer is referred to comments 11-16 through 11-19 made by Assistant City Attorney Steve Wiley in order to provide historical accuracy, since many people mistakenly think that development of a 75-bed youth hostel is tied to development of the Red Lion Resort. As Mr. Wiley states, if Parcels B and C of the Park Plaza Specific Plan are not developed, then no open space or youth hostel would have to be developed.

22-17 Comment acknowledged. The reference is made to Milpas Street and the Salsipuedes Street Extension and the associated distribution and diversion effects in an effort to provide an areawide overview of the anticipated future traffic and circulation situation.

22-18 Comment acknowledged. The discussion of an alternative use which would cause increased environmental impacts is provided for several reasons. Because of the long history of the property and its development proposals, this alternative was added for information purposes. However, it should also be noted that there are tradeoffs between various alternatives and the level of mitigation offered by those alternatives to individual impacts within the environmental impact report. Some alternatives would have a greater mitigating impact on noise-related impacts whereas others would have a greater impact on mitigating visual impacts. The EIR has been revised to provide a better classification of the nature, intent and context of the Alternatives discussion. For additional information, see the revised Alternatives section text.

22-19 Comment acknowledged. No specific gross floor area specifics were provided on the Plazuela Alternative by the commentor when initially contacted to help define this alternative. Several attempts were made to solicit input from proponents of this alternative, but no substantive information was provided. Therefore, the report preparers contacted ERA, their economic and fiscal consultants, for reasonable assumptions. The reviewer is referred to the Alternatives section which has been revised to provide additional review of a new alternative.

22-20 Comment acknowledged. The assumption that the City would purchase the site was based on conversations with the applicants and City staff. Lacking a known willing investor, the assumption was made that the City would participate in the alternative as described in the Alternative section. However, this assumption has since been revised; please see the amended text.

22-21 Comment acknowledged; please see the revised Alternatives section for analysis of a new alternative that is consistent with the Specific Plan and does not create any Class I, significant adverse impacts.

22-22 Comment acknowledged. However, since the Red Lion Project was constructed AB 3180 was passed and enacted into law, requiring mitigation monitoring. One of the authors of this EIR was aware of the concerns voiced by the UCSB class and was one of the co-authors of the actual research which led to the passage of AB 3180.

Comment Letter 23

Mullen & Henzell

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April 26, 1993

Mr. John Cahill
Development Planning & Consulting
4304 Hunt Club Lane
Westlake Village, CA 91361

Re: Draft Environmental Impact Report for Waterfront Park and Hotel and Youth Hostel Project (SCH NO. 92091038)

Dear Mr. Cahill:

As you requested, we have reviewed the letter from Linda Kropp of the Environmental Defense Center to the City of Santa Barbara Environmental Review Committee dated April 16, 1993 regarding the above-referenced project. We are writing to provide you with our analysis regarding the issues raised by Ms. Kropp's letter.

1. Consistency of Project With Specific Plan.

23-1 Ms. Kropp's letter begins by stating that the "primary concern with the project is that the proposed development violates the City's Local Coastal Plan (LCP) and Specific Plan policies for the subject property". We believe this concern is unfounded because the Specific Plan is proposed to be amended as part of the approval of the project (DEIR, page 17). Therefore, this inconsistency will be addressed. In any case, the consistency of the project with the Specific Plan and the desirability of amending the Specific Plan are planning issues which go to the merits of the project and are not issues appropriately raised in comments on the DEIR.

2. Analysis of Alternatives Which Reduce Project Impacts.

23-2 The main thrust of Ms. Kropp's letter is that "[t]he alternatives analysis in the DEIR is woefully inadequate". Ms. Kropp argues that "[i]nstead of providing a reasonable range of alternatives capable of either eliminating or reducing significant adverse environmental impacts, as required by the California Environmental Quality Act

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("CEQA"), the DEIR evaluates alternatives which would, in several instances, increase the environmental impacts of the project."

Ms. Kropp is correct that, as a general rule, the discussion of alternatives should focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance. This is true even if the alternatives would impede to some degree the attainment of the project's objectives or make the project more costly. State CEQA Guidelines section 15126, subdivision (d)(3). This general rule, however is subject to numerous limitations under CEQA.

23-2 cont.

For example, CEQA provides that an EIR need only describe a reasonable range of alternatives to the project, or to the location of the project, which could feasibly obtain the basic objectives of the project. State CEQA Guidelines section 15126, subdivision (d). *Citizens of Goleta Valley v. Board of Supervisors ("Goleta II")* (1990) 52 Cal.3d 553 at pages 564-566. In addition, although the preparers of an EIR must "use reasonable diligence to investigate project alternatives" (*Del Mar Terrace Conservancy, Inc. v. City Council of the City of San Diego* (1992) 10 Cal.App.4th 712, 740), "[t]he discussion of alternatives need not be exhaustive, and the requirement as to the discussion of alternatives is subject to a construction of reasonableness". *Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979) 89 Cal.App.3d 274, 286. The range of alternatives required in an EIR is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. State CEQA Guidelines section 15126, subdivision (d)(5).

CEQA also provides that, although an alternative is not infeasible just because it would make a project more expensive or less profitable, if there is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project, the alternative is infeasible. *Citizens of Goleta Valley v. Board of Supervisors* ("Goleta I") (1988) 197 Cal.App.3d 1167, 1181.

A project alternative which cannot be feasibly accomplished need not be exhaustively considered in an EIR. A feasible alternative is one which can be accomplished in a successful manner within a reasonable period of time, taking into account economic, legal, social and technological factors.

Whether an alternative project site is owned or can reasonably be acquired by the project proponent has a strong bearing on the likelihood of a project's ultimate costs and the chances of an expeditious and successful accomplishment. *Goleta II, supra,* at page 574. The *Goleta II* opinion indicates that, unlike the case of a public entity with the power of eminent domain, an EIR for a project proposed by a private entity need only consider alternative sites if the private developer owns or controls feasible alternative sites, has the ability to purchase or lease such alternative sites or otherwise has access to suitable alternatives. *Goleta II, supra,* at page 575.

There is no requirement that infeasible sites be discussed in an EIR. *Methow Valley Citizens Council v. Regional Forrester* (9th Cir. 1987) 833 F.2d 810.[1] In fact, it has been held that where a developer does not have any ability
23-2 to acquire an alternative site, it is not appropriate to
cont. include the alternative in the EIR because the availability of the alternative for development is entirely speculative. *Save our Residential Environment v. City of West Hollywood* (1992) 9 Cal.App.4th 1745, 1753, fn. 1.

With these rules in mind, the following observations can be made:

> The DEIR states at page 234 that the alternatives analysis focuses on how, if feasible, to reduce the adverse impacts of the project (air quality, traffic, visual and noise impacts) or otherwise avoid the need to impose project specific mitigation measures. The focus of the alternatives analysis is therefore consistent with the requirements of CEQA.
>
> The objectives of the project are set forth at pages 14 through 16 of the DEIR. The DEIR is only required to consider alternatives that meet these objectives.

---

1 Although portions of the *Methow* case were overturned by the United States Supreme Court in *Robertson v. Methow Valley Citizens Council* (1989) 490 U.S. 332, the Supreme Court did not address the alternatives portions of the Ninth Circuit decision. The *Methow* case's discussion of alternative therefore remains good law (*Methow Valley Citizens Council v. Regional Forrester* (9th Cir. 1989) 879 F.2d 705.

23-3 The DEIR does address alternatives that result in less environmental impacts than the proposed project. The DEIR concludes that both the no project alternative and the alternative project design would result in less significant environmental impacts than the proposed project.

23-4 Although the DEIR includes certain alternatives that would result in greater environmental impacts, the inclusion of these alternatives is proper under CEQA. Section 15126, subdivision (d)(4) of the State CEQA Guidelines provides as follows:

> If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

The foregoing section makes it clear that, in certain cases, an EIR will include alternatives that result in greater impacts than the project as proposed. To a certain extent, this result is unavoidable because it is not until an alternative has been fully evaluated in an EIR that the full impacts from the alternative are known. Therefore, the inclusion in the DEIR in this case of alternatives which result in greater impacts than the proposed project, is proper under CEQA.

23-5 There is evidence that reducing the project to 80 units, which is the minimum size required to avoid certain significant environmental impacts, would not be feasible. The Economic and Fiscal Review of the Proposed "Waterfront Park Hotel" prepared by ERA in December of 1992 concluded that a 125-room hotel would be the minimum size for an economically viable project. The EIR is therefore not required to analyze an 80-room project as an alternative, even though the alternative would reduce environmental impacts, because such an alternative is infeasible.

23-6 The fact that a the Parker Family Trust is a private developer who does not own alternative hotel sites and has no means to acquire them is relevant in determining whether an alternative is feasible and limits the need to analyze alternatives in the DEIR.

23-7 g. The DEIR does address a reasonable range of alternatives as required by CEQA. In addition to the no project alternative, the EIR analyzes five other alternatives, including on-site and off-site alternatives. The review of alternatives need not be exhaustive and is governed by the "rule of reason".

23-8 Based on the foregoing, it appears that the discussion of alternatives in the DEIR is adequate. In response to Ms. Kropp's comments, the preparers of the DEIR may wish to include a statement in the final EIR that they diligently attempted to identify all alternatives that would not only reduce the project's impacts, but would also be feasible and attain the project's objectives. The preparers might also indicate that the DEIR contains all of the alternatives that were identified as a result of these efforts.

3. Deletion of Alternative No. 3.

Ms. Kropp also argues in her letter that "the City must delete alternative #3 and replace it with a project description which is both consistent with the Specific Plan and which would eliminate or reduce project-generated impacts."

23-9 There is no requirement under CEQA that an EIR omit an alternative simply because the alternative had been previously rejected by a city based on potential environmental impacts. In addition, as indicated above, section 15126, subdivision (d)(4) of the State CEQA Guidelines contemplates that alternatives evaluated in an EIR may have greater impacts than the proposed project. There is also no requirement under CEQA that an EIR evaluate alternatives which are consistent with an existing Specific Plan. Ms. Kropp's argument in this regard is therefore without merit.

4. Alternative Project Design.

23-10 With respect to the alternative project design analyzed in the DEIR, Ms. Kropp argues that the alternative is too large to significantly reduce impacts and that there is no evidence in the DEIR that an 80-room hotel would be economically infeasible. As indicated above, the Economic and Fiscal Review of the proposed Waterfront Park Hotel prepared by ERA in December of 1992 concluded that a 125-room hotel would be the minimum size for an economically viable project. To ensure that the ERA report is part of the final EIR and the Administrative Record for the project,

23-10 cont. the preparers of the DEIR may wish to include the ERA report as an exhibit to the final EIR. As an alternative, the ERA report could be specifically incorporated by reference in the final EIR and copies of the study could be made available to anyone wishing to review the EIR. Assuming that the ERA study validly concludes based on substantial evidence that a 125-room hotel would be the minimum economically viable size, the 80-room alternative need not be considered in the EIR because such an alternative would be infeasible.

5. *Project Size Required to Support Youth Hostel and Plazuela Alternative.*

23-11 It is my understanding that you will be evaluating the Youth Hostel and Plazuela Alternative issues raised by Ms. Kropp and that, if appropriate, you will be submitting comments on these issues to the City.

I hope that this letter has addressed your questions regarding Ms. Kropp's letter. If you read any additional information, please do not hesitate to contact us.

Very truly yours,

Richard Battles

Richard G. Battles of
MULLEN & HENZELL

RGB:lb

cc: Parker Family Trust
J. Robert Andrews, Esq.

rgb/04925/0106/CORRO/0423cah111

Response to Comment Letter 23

Note: The report preparer acknowledges that the following letter has been received and is intended to respond to questions and comments raised by another reviewer of the Draft EIR It is useful in providing a perspective on the issues raised. However, many of the concerns raised by the letter have already been resolved in responding to the comments of the Environmental Defense Center (see Comment Letter # 17)

23-1 Comment acknowledged. See response to comments 17-1, 17-2 & 17-3.

23-2 Comment acknowledged. See response to comments 17-4, 17-5, 17-6, & 17-7.

23-3 Comment acknowledged; no response necessary.

23-4 Comment acknowledged; no response necessary.

23-5 Comment acknowledged; no response necessary.

23-6 Comment acknowledged; no response necessary. See also response to comment 17-8.

23-7 Comment acknowledged; no response necessary.

23-8 Comment acknowledged; no response necessary.

23-9 Comment acknowledged; no response necessary.

23-10 Comment acknowledged. The ERA report has already been incorporated by reference into the EIR.

23-11 Comment acknowledged; no response necessary.

Comment Letter 24

WATERFRONT PARK AND HOTEL
AND
YOUTH HOSTEL PROJECT

(PARKER FAMILY TRUST)

ENVIRONMENTAL IMPACT REPORT COMMENTS

GENERAL COMMENTS - **History**

24-1 The Waterfront Park, Hotel and Youth Hostel Project is a continuing project of the original Fess Parker's Red Lyon Inn approved for development in 1985.

Pier to 1985 this project was proposed beginning at 1000 rooms scaled down little by little to 400 at which point it finally went to the vote of the public and passed at 360 rooms.

24-2 Mitigating conditions of approval for the original Red Lyon hotel were placed on "parcel B" which is now the parcel designated for the new hotel the Waterfront Park Hotel.

Three of those conditions which have significant impact on tourism and the community are as follows.

24-3 a. There were to be no more additional hotel units on Parcel "B". This was due to the fact that the most controversial issue in the Red Lyon proceedings was the actual size of the hotel. Thus in order to contain the original hotel to the size approved by the city, coastal commission and the public a mandate was placed on parcel "B" that there could be no additional hotel rooms built on this property. **This mandate still exists.**

24-4 b. If development was to occur on parcel "B", Mr. Parker is also mandated by the original Red Lyon agreement to add a park in the majority of parcel "B" which could be used by citizens and tourists alike. At the time of the public vote in 1985 the general concept of the public was that the park was part of the Red Lyon deal and we all would enjoy the park as was the original plan for that area years and years ago. (Olmstead)

24-5 c. A limitation was also put on parcel "B' which stated that if developed Mr Parker could not build on more than 2 acres unless he also built a youth hostel on site. In that case he could use up to 3.5 acres for buildings.

PRESENT PROJECT - **How does it compare?**

24-6 The current project calls for 150 upscale guest rooms. **Hotel rooms are not allowed on this property.**

24-7 The project calls for a large very nice park to be built the west end of which is city property. Note, the city and citizens really want this park to be competed. The fact that the city owns part of the property that is going to be included in the park is part of the reason for the joining of the city with Parker on this project. **The park, which seems very well designed, is the carrot that is being presented for the purpose of the development of an additional hotel.**

24-8 The proposed hotel is 3.0 acres. This poses a problem with the 2.0 limit unless they build a youth hostel on the premises. Parker is proposing that instead of building a youth hostel on the property they build it off site at the corner of Montectio Street and Chapala Streets.

Rebuttal to the Environmental Impact Report on Economic and Fiscal Impact

24-9 Page 115 in the bottom paragraph refers to little or no new construction of hotel rooms in the South Coast. This statement does not include hotel rooms which have already been approved an will have a significant impact. One such project within 1/2 of the Parker Hotel is Bill Wright's project which includes 250 hotel rooms.

24-10 **In looking at the tables on pages 216 and 217 and others I see no tables regarding occupancy of the areas. Occupancy tables are very important because it gives a much more accurate view of the real condition of the hotel industry in a community.** You will see that occupancy rates in Santa Barbara have been dropping for many years and only in this last year have picked up to 66% due to an aggressive Santa Barbara advertising campaign.

24-11 **Occupancies less than 70% are a sign of an unhealthy tourist trade within a community that depends so heavily on tourism.**

24-12 Also note that the average room rate according to the graph on page 219 (3182 x66%x365=766,500/$52,861,000) is $68.96 or 69.00. **The youth hostel at $15 to $20 dollars per person will have an average room rate of $59.00 to $78.90 per night. There are many many motels and Inns in our community running empty at less than this rate. We definitely do not need more low cost hotel rooms!**

24-13 **The property designated for the youth hostel was originally designed for car parking for the activities at the train station.** Where is the parking for that area when the station gets remodeled and more people use mass transit?

24-14 Overflow guest rooms which are supposed to flow into the surrounding hotels as part of the original Red Lyon hotel agreement will be refereed to the new Parker hotel. **Business will be directly taken away from surrounding hotels.**

24-15 Like any other industry the hotel industry works on supply and demand. More hotel rooms will not benefit other hotels in the area but will cause them to lose occupancy. This will lessen cash flow for these hotels and cause their facilities to suffer because of lack of upgrade. An occupancy chart would show this effect. We could have only one hotel bringing in the majority of the money and the rest in terrible condition, this hypothetical situation would not show up in the graphs presented.

24-16 Room rate cannot be controlled by government or anyone except the management and ownership of the hotels involved. In 1987 the disparity of average room rate between the Red Lyon and other hotels was significant. Now it is minuscule. The difference is not that the other hotel's rates have increased very much, it is that the Red Lyon's rates have decreased. **On a regular basis the Red Lyon offers rates significantly less than many, many of the areas hotels. It is a four diamond hotel and is in direct competition with Santa Barbara area hotels. The new proposed hotel is also 4 to 5 diamond. There is absolutely no reason to think that is hotel would not be**

24-16 cont. in the same combative market with all the rest of the hotels and inns struggling for survival in this community.

IT IS AN HAS BEEN THE RECOMMENDATION OF THE GREATER SANTA BARBARA LODGING ASSOCIATION THAT A VALID ECONMIC IMPACT STUDY BE DONE USING A QUAIFIED AND RESPECTED RESEARCH COMPANY WHICH SPECIALIZES IN LODGING ISSUES. WE STRONGLY URGE THAT THIS STUDY BE COMPLETED.

Response to Comment Letter 24

24-1 Comment acknowledged. The original Red Lion Hotel project was revised from 1,000 rooms to 360 rooms through the City of Santa Barbara's planning, environmental review and decision-making process. The project which was subjected to a vote of the people was the 360 room project.

24-2 Comment acknowledged; no response necessary.

24-3 Comment acknowledged; no response necessary.

24-4 Comment acknowledged; no response necessary.

24-5 Comment acknowledged. The conditions of approval also allowed the project applicant to construct a hostel off-site or to post a bond for the preparation of plans and engineering fees in connection with a hostel. If one of the three alternative hostel requirements were satisfied, then up to 3.4, not 3.5 acres could be developed on Parcel B.

24-6 Comment acknowledged. The proposed project description includes an amendment to the Specific Plan which would allow hotel development on Parcel B.

24-7 Comment acknowledged; the park and the hotel components are part of a joint venture/partnership by the Parker Family Trust and the City Redevelopment Agency.

24-8 Comment acknowledged; no response necessary.

24-9 The cumulative analysis does not incorporate the development included in the Cabrillo Plaza Specific Plan. While the Specific Plan itself has been approved and has decided the uses that would be acceptable with the Specific Plan area, the actual development plans have not been submitted to the City for consideration or approval. Given that the Specific Plan was adopted 10 years ago and the owner of the property has not submitted any application to initiate this project nor has he indicated that he plans to do so in the near future, it does not quality as a "reasonably foreseeable future project" under the California Environmental Quality Act and is not included in the cumulative list. All of the projects that are on this list are either in the application process, have been approved by the City (and those approvals are still valid) or have applied for or been issued building permits.

24-10 Comments acknowledged; please see revised text.

24-11 Comments acknowledged; please see revised text. Hotel occupancy levels are a key measure of the demand for area's tourism product and of the overall health of a region's visitor industry. Occupancy rates were considered in preparing the Economic and Fiscal Impacts section of the DEIR, but were not included in the report for the following reasons:

1. The national recession has had a severe impact on the California economy, particularly in Southern California. The tourism industry has suffered as reflected in lower than desirable occupancy rates in Santa Barbara in the past. However, by the time the proposed hotel is

completed, California is expected to have experienced a gradual economic recovery. As such, occupancy rates should increase to a market equilibrium of 70 percent.

2. The proposed hotel will not add a significant amount of new inventory to the existing lodging facilities in Santa Barbara. The Luxury Hotel alternative will add 150 rooms, increasing the total number of rooms in Santa Barbara by 4.7 percent. The Reduced Hotel alternative will add 125 rooms, increasing the total number of rooms by under four percent.

3. Historically low occupancy rates in Santa Barbara are not necessarily a sign of an unhealthy South Coast tourism market. As shown in Table VIII-2 in the DEIR, Santa Barbara's average room revenue is below the South Coast average and substantially below that of its neighboring communities of Goleta and Montecito. It thus appears that Santa Barbara is not as competitively positioned in the South Coast tourism market as other nearby communities. As stated in the DEIR, Santa Barbara has more than its share of the smaller, older and moderately priced facilities.

4. As described in the DEIR, the proposed luxury hotel should be viewed as an investment in Santa Barbara's future to maintain its position as a first rate tourist destination. Santa Barbara needs to remain competitive not only within the South Coast market, but with other California coastal communities such as San Diego and Monterey. As such, emphasis has not been placed on occupancy levels which only reflect demand for the type of tourism product that Santa Barbara currently offers.

24-12 Comments acknowledged; please see revised text. The average room rate according to Table VIII-2 in the DEIR, assuming a 66 percent occupancy rate, amounts to approximately $69 per room night. An individual would thus pay between $35 to $69, depending on whether the person was staying in the room alone or sharing it with someone else. The youth hostel at $15 to $20 per person thus represents a significant cost savings to the low budget traveler. Furthermore, the youth hostel should not be viewed as another "low cost hotel," but as an alternative to the traditional motel lodging type facility. It should be noted that hostels typically require that guests participate in daily hostel chores such as kitchen clean up, sweeping, etc. Also, hostels are more likely to accommodate single travelers who do not have the benefit of sharing the cost of a $50 motel/hotel room with traveling companions.

24-13 Comment acknowledged. The hostel site is designated as Hotel and Related Commerce. There have been considerable formal and informal discussions on possible uses for this site since the original adoption of the Central City Redevelopment Plan. While the hostel site could be used as a public or private parking lot or garage, there are not present requirements for such a use. At such time as the railroad station area is improved or remodeled, the environmental review of that project must deal with project-specific and cumulative parking impacts as appropriate.

24-14 Comment acknowledged; please see revised text. The proposed hotel will be the first top-rate luxury resort property in the City of Santa Barbara and will be targeted to a very select clientele. It is expected to have an exceptionally high level of standards and expensive pricing and thus should not be viewed as direct competition to surrounding hotels. Lodging facilities that offer similar room rates are in competition with one another, but not with those that are priced substantially more. In addition, the reviewer offers no concrete evidence to support the claim that overflow guests at the Red Lion would be referred to the proposed project.

24-15 Comments acknowledged; please see revised text. As pointed out in 24-14 above, lodging facilities in a given area with similar room rates are in direct competition with one another, but are not in competition with those that are priced substantially more. With the exception of perhaps the Biltmore and Red Lion Resort, other hotels in the area are not expected to lose business as a direct result of the proposed hotel.

24-16 Comments acknowledged; please see revised text. Hotels typically discount room rates in off-season periods and during recessionary times when the entire visitor industry is suffering due to lack of consumer spending. As the economy in California began to weaken in the latter half of 1990, consumers tended to become more money conscious and chose to reduce their discretionary spending. As such, many hotels choose to reduce room rates in order to attract potential visitors. As the economy in California recovers, attractive room discounts and travel packages may not be as plentiful. It is not likely that the proposed hotel will offer rates similar to other hotels and inns in the Santa Barbara market. As a first-rate luxury hotel, it will be targeted to a select clientele which is not as budget-oriented as other travelers. As mentioned in the DEIR, the proposed hotel is expected to have an effective room rate in excess of $200 per night.

3/11/93

Dear Commission:

I am just appalled to read of the proposed Fess Parker Development on Cabrillo. The traffic on Cabrillo and neighboring streets since the Red Lion Inn was put in has increased exponentially. And, speaking as a former Los Angeleno, the air quality is beginning to resemble L.A.'s. I cannot imagine that we NEED another luxury hotel, anyway.

25-1 As to Fess's "park" - the grounds around the Red Lion Inn that are termed "park" are in no way conducive to public use.

As to the Youth Hostel location adjacent to the Moreton Bay Fig Tree, you may as well bring in the tree cutters. Recall what a few homeless were doing to the root cystem & imagine what hordes of bags could do. I don't know what "hold" Fess Parker has over the powers that be, but it seems to me it's high time for the Planning Commission & City Council to learn how to pronounce the word NO.

Also, Milpas Street is becoming almost impossible to get through. Please don't add to its congestion. Thank you.

Patricia Douglas
165 Canon View Road
Santa Barbara, CA 93108

Response to Comment Letter 25

25-1 Comment acknowledged. With construction of the proposed project, the cumulative list of pending projects and the Salsipuedes Street extension, all intersections along Milpas Street would operate at better than existing conditions. Construction plans for the extension of Salsipuedes Street are analyzed in this EIR and it is also a requirement of this EIR that the street extension be constructed prior to operation of the proposed hotel, if it is approved. The Cabrillo/Highway 101 Southbound On/Off ramps-Northbound Off-ramp intersection currently operates at LOS "F". This EIR requires that a traffic signal be installed at that intersection prior to operation of the hotel in order to improve intersection operating conditions above existing conditions. Therefore, no long-term significant, adverse traffic impacts are anticipated due to the required mitigation measures.

The City and Air Pollution Control District have expressed their commitment to work on developing a pilot mitigation program that would reduce project-related air quality impacts. However, long-term air quality impacts remain significant and unavoidable at this point in time.

The proposed park was designed after extensive community participation so that the park space would be more usable than that provided in front of the Red Lion Resort.

The Biological Resources section states that impacts to the Moreton Bay Fig Tree are expected to be insignificant for a variety of reasons. The reader is referred to Section VIG, Biological Resources, for further information.

Comment Letter 26

3-11-93 Re: Fisi
from Parker's
Leola Langlo proposed
hotel —
54 yr. Resident —
To Jan Hubbell
city planner
& city planning Commi

VIKINGCREST
1230 Northridge Road
Santa Barbara, CA 93105

Black mail is the
issue here it seems to
me. What has a proposed
youth Hostel - not even
near Mr. Parker's property,
26-1 got to do with the new
hotel? As to the coastal
sky line - this can only
be improved by the hotel -
Then there is the terrible
junk yards nearby - how

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PLANNING DIVISION

ph 964-1419

page 2

terrible it looks. Bad enough to have visitors & our own people come to look at the present old girls & are now on the freeway near town!

26-1 cont.

Since 1981 Mr. Parker has been trying for this beautiful project - anyone else would have given up long ago. He loves S.B. & I'm a CC for this marvelous new hotel. Do we need another "bird-refuge" smelly pond also?

Thank you Mrs. Langlo

Response to Comment Letter 26

26-1 Comment acknowledged; no response necessary.

Comment Letter 27

April 16, 1993

Environmental Review Committee
City of Santa Barbara
De La Guerra Plaza
Santa Barbara, CA 93101

Re: Draft Environmental Impact Report for the Waterfront Park and Hotel and Youth Hostel Project

Dear Committee Members,

By way of introduction, I have been involved with the City's planning efforts for the East Cabrillo area for over a decade. From 1972 to 1981, I was part of the East Beach Committee which evaluated the Red Lion Inn Specific Plan. After many years of deliberations and negotiations, our committee decided to endorse the proposal for a 360-room Red Lion Inn.

Endorsing the Red Lion Inn Specific Plan proposal was a difficult decision for me. The environmental community was terribly split on the issue. However, I felt that our negotiations
27-1 resulted in mitigation of the most significant impacts associated with the development of the Red Lion Inn; therefore, I supported the project, much to the dismay of many of my friends.

My support was based on the mitigation measures and conditions we negotiated with the developers. For example, we felt that the original proposal to build a 500-room hotel was too large for this site. We negotiated a reduction to 360 rooms. This reduction was necessary to mitigate impacts to views along Cabrillo, traffic, and open space.

We also negotiated the dedication of public park and open space lands. Unfortunately, the development of the Red Lion Inn did not result in the provision of a public park for the residents and visitors of Santa Barbara. It is critical that the remainder of the Specific Plan site be used as mitigation for the park we
27-2 never received from the development of the Red Lion Inn. Under the terms of our agreement (and the City's and Coastal Commission's approval of the Red Lion Inn Specific Plan), the dedication of this park is not dependent upon any further hotel development on the site. In fact, further hotel development is specifically prohibited.

Mitigation for the lack of affordable accommodations at the
27-3 Red Lion Inn was the guarantee that a 75-bed youth hostel would be

27-3 cont. built on-site or nearby in the coastal zone. The hostel was supposed to be built within two years after the Red Lion Inn opened. More than two years has passed, and no hostel has been built.

27-4 This history is important, especially to those of us who bargained so hard for these mitigations. The City must remember that the developer has a legal obligation to provide the park and hostel, regardless of whether he receives permission to build his new hotel. In other words, the hotel is not necessary for the public to receive the benefits of the park and hostel.

27-5 It must also be recognized that the development of another hotel defeats the intention of the City and Coastal Commission in 1981 to provide visitor-serving services and/or residential housing along the waterfront.

27-6 Finally, the development of a new 150-room hotel completely nullifies the mitigation measure mandating a reduction in the number of rooms on the site from 500 to 360.

27-7 The Draft Environmental Impact Report needs to be revised to accurately explain the conditions placed upon this Specific Plan in 1981. New development should not be allowed to undermine the mitigations and conditions this community bargained for at that time. **Mitigations which were already required in 1981 to offset impacts from the Red Lion Inn (e.g. the public park, dedication of open space, and development of a youth hostel) should not be used now to offset impacts from new hotel development.**

Thank you for your consideration of these comments. We must keep our promises to the community.

Sincerely,

Selma Rubin

Selma Rubin

att.

If Selma says it's just right it must be.

She's not easily convinced of anything.

Selma Rubin. Widely respected environmentalist and community activist supports Fess Parker's Park Plaza Hotel-Conference Center and Park.

Why?

Because the project has been approved by every city and state planning and environmental review board.

Because the project will be done in a style and size just right for Santa Barbara.

And finally because Park Plaza has won the support of numerous homeowner and citizen groups.

Selma is just one of many environmentalists to support Park Plaza.

Please join Claudia Madsen, Paul Relis, Bob Easton, Michael Gray, Robert Klausner, Richard Appelbaum, Ben Bycel, Captain Atlee Clapp, Mary Clapp, Alice Rypins, June Sochel and many others in *voting YES on March 12.*

Paid for by Citizens for Park Plaza, 122 West Figueroa, Santa Barbara, CA 93101

Response to Comment Letter 27

27-1 Comment acknowledged; no response necessary

27-2 Comment acknowledged. Provision of public open space on the project site is tied to development of Parcels B and C of the Park Plaza Specific Plan. Without development of Parcels B and C, open space and the youth hostel do not have to be developed. The reviewer is referred to comments 11-16 through 11-19 made by Assistant City Attorney Steve Wiley.

27-3 Comment acknowledged. The reviewer is again referred to comments 11-16 through 11-19 made by Mr. Steven Wiley at the April 16, 1993 ERC hearing. Mr. Wiley stated that the Applicant had satisfied the conditions of approval for Parcel A (the Red Lion Hotel) through his offer of dedication.

27-4 Comment acknowledged. However, given the satisfaction of conditions of approval for Parcel A, functionally speaking, it is uncertain whether or not the general public will receive the benefits of a public park on either parcels B or C without some level of development on either or both of those parcels.

27-5 Comment acknowledged. It is true that in 1981, neither the City or the Coastal Commission intended to permit hotel or motel uses on Parcel B. Visitor-serving and residential land uses are secondary, not primary uses for Parcel B. The primary uses envisioned for both Parcels B and C are public park and recreational facilities developed in conjunction with public parking.

27-6 Comment acknowledged. From an environmental impact assessment process, the reduction in rooms at the red Lion from 500 to 360 was a substantial change in the project's design and description, with substantial mitigating effect. This EIR evaluates the proposed project and recommends mitigation measures to reduce or eliminate its impacts. The impact sections within the report address those foreseeable impacts which result from existing conditions (including the Red Lion Resort) and the proposed project. However, the report preparers are unable to make a direct or indirect connection between development on Parcels B and C which is consistent with the City's General Plan, LCP, Charter sections 1507 and 1508 and the Specific Plan, and the previous, unapproved proposals for Parcel A.

27-7 Comment acknowledged. See response to comment 27-6 immediately above.

Comment Letter 28

April 16, 1993
To: Environmental Review Committee
From: Miriam Flacks 3758 Brenner Drive Santa Barbara, CA

COMMENTS ON DRAFT EIR FOR PARKER PROJECT: LCP CONSISTENCY

The Consistency Analysis (Section V.9.2, pp. 63-64) is deficient in that it makes incorrect or unwarranted assumptions and misstates historical fact. These deficiencies relate to the inconsistency of the proposed project with both the City's LCP and the Coastal Commission's previous rulings.

1. **Coastal Commission rulings**

In approving the Red Lion development (in 1981), the Coastal Commission specifically:

A. Sought to limit the total number of hotel rooms on the waterfront. According to members of the Commission at the time, this was done to:

a) maintain mixed use of the area, instead of a massive "hotel row"

28-1 b) preserve open space, which massive hotel buildings would minimize

c) encourage other visitor-serving uses (e.g. commercial services for tourists and coastal zone residents) to minimize car trips and transportation impacts on the waterfront area

B. Required the construction of a youth hostel to meet the Commission's (and the City's) goal of maintaining visitor services for all income classes; it sought to encourage the construction of that hostel on the waterfront site by offering bonus development rights in return for its on-site construction.

C. The question of whether Santa Barbara had too many hotel rooms overall was not addressed by the Coastal Commission, nor was it a question in its purview.

The draft EIR is misleading in its review of inconsistency with prior land use decisions for the parcels in question. Further, it presents the hostel development as a mitigation for the proposed project; the hostel was a mitigation for the Red Lion Project, required for any further development of the Parker

28-2 property. As proposed, the net total of up-scale rooms would increase by 1/3 (to the original, rejected level of 1981) while the same amount of low-cost accomodation would be provided by the construction of a single hostel. (How many further projects can this single hostel be proposed to mitigate?)

2. **City's LCP**

Policy 4.4 reads: "New hotel/motel development within the coastal zone shall, where feasible, provide a range of rooms and room

28-3 prices in order to serve all income ranges." The provision of an exclusive, luxury hotel within the coastal zone violates the letter and spirit of this policy.

28-4 Coastal Act Section 30253 states: "New development shall:... (4) minimize energy consumption and vehicle miles travelled." Further hotel rooms built in the waterfront area, as proposed by this project, without the provision of near-by services for the visitors in these rooms promotes (rather than minimizes) vehicle miles travelled.

28-5 The Specific Plan for this site approved in 1981 sought to maintain the area as both a recreational resource for the community and tourists and to provide for development that would serve the needs both visitors and residents; it did not envision the waterfront strip as the place to address any possible lack of luxury hotel rooms in the area. The draft EIR implies that the 1986 Hotel/Tourism Study, the completion of Paseo Nuevo, and the passage of Measure E result in a changed set of goals and policies for the waterfront -- retail downtown, and hotel rooms on the waterfront. This planning goal is stated by Interface, not by any existing City policy -- and is, in fact, inconsistent with City General Plan and LCP policies.

Response to Comment Letter 28

28-1 Comment acknowledged; response to this comment is integrated with 28-2 below.

28-2 Comment acknowledged. Review of the Coastal Commission Staff Report indicates that the construction of a hostel, either on- or off-site (Parcels B & C) is a condition of approval of the Park Plaza project (Coastal Commission Condition D). The text will be revised to clearly reflect this situation. Because the present Specific Plan does not allow for hotel uses on Parcel B, it is difficult to speculate whether the Coastal Commission ever employed any criteria related to the net total of "up-scale" rooms in the Waterfront Area. The only reference to the representative share of high, moderate or lower-priced room rates which provides a policy basis for an appropriate mix of room rates is Coastal Act Section 30213 (see Draft & Final EIR text) and City LCP Policy 4.4 which do not address a specific mix of low, moderate or high room rates.

28-3 Comment acknowledged. The reviewer expresses concern that the provision of 150 luxury hotel rooms violates the spirit and the letter of LCP Policy 4.4. It is beyond the scope and focus of this EIR to make any policy determinations related to the spirit of Policy 4.4 or any other public policy, unless such spirit is explicitly stated within the policy. In this case it is not. In addition the policy does not provide any objective criteria which would indicate that the letter of the policy has been violated by the proposed project. The policy is also concerned that the Coastal Zone, as a whole, contain a range of room prices.

28-4 Comment acknowledged. The proposed hotel would provide basic services to hotel guests as a part of the project (See Table III-3). Other supportive services are provided in the Waterfront Area Shuttle.

28-5 Comment acknowledged. The Draft EIR sought to characterize the land uses changes within the City as conditions which were not known at the time of Specific Plan adoption and factors which may be important to consider in the evaluation of the proposed project. The Draft EIR does not implicitly or explicitly imply a changed set of goals or policies for the Waterfront Area.

Comment Letter 29

4-25 RECEIVED

APR 26 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

Re: Draft Environmental Impact Report
Proposed Waterfront Park and Hotel

Dear Members of City Council
and Directors of Environmental Review,

Please excuse the informality of this letter, I find I've left myself very little time to respond to the meeting I heard televised regarding the draft EIR report for the waterfront activities that are proposed, therefore I will be very brief in my comments.

29-1 Firstly, I am very concerned that Mr. Parker may have overstepped his bounds by proposing another hotel at this site. At the workshops I attended for the Park, I was under the impression the hotel was an approved concept, yet had often thought how unfortunate that the property needed to be further broken up. The original concept dating all the way back to The Olmsted Brothers is one I've held in high esteem for the area, and when it came down to this small parcel that would remain I thought "what a terrible shame". Nevertheless, I was glad to know a park would someday be there. Now, listening to others speak, that under mitigation for The Red Lion, there where specific conditions to be meet, including parkland and NO more hotels, I would request that that be fully disclosed to the public, that voted in regards to many of the specifics, as to the validity of these claims many folks are making. If indeed there's a remote chance that All the area that remain could be developed into park, that is where my vote lies.

29-2 Next, I have GREAT concern about the casual nature in which the Teen Center seemed as tho' it would be displaced or abandoned. This town needs disperately to provide a welcome, enjoyed facility for our youth from 10 to 18. I am a big advocate for this kind of thing to exist and I was very confused why it would affect the EIR. More traffic? Graffetti? Whereever we FINALLY find a place for our teens, it will mean the same elements need to be addressed, why show them we do care about them and give them a place in the heart of our community, neutral to all neighborhoods, and so loved by the young, beachside!!!

29-3 Lastly, I am ademintly opposed to a stop light in the center of the park, and since we can't go under, pollute going thru Carrillo, I propose a BEAUTIFUL Stone Landmark Bridge to cross over and for vistas out!!!!

Thank You for keeping me informed via letters, I WILL be following closely!

Most Sincerely, Kae A. Mori

P.S. WHY is it going to take SOOOOOOO Long?????

KAE A. MORI
1410 N. SALSIPUEDES
S.B. 93103

Response to Comment Letter 29

29-1 Comment acknowledged. The Specific Plan requirements and California Coastal Commission Conditions of Approval for the hotel and park site are disclosed and discussed in Section V, Land Use Considerations. The reviewer is referred to comments 11-16 through 11-19 made by Steve Wiley, Assistant City Attorney, in an effort explain the condition pertaining to provision of a youth hostel. As Mr. Wiley explains, if Parcels B and C of the Park Plaza Specific Plan (the proposed park and hotel site) are not developed at any point in the future, public open space and a youth hostel do not have to be developed. Or if Parcel B is only developed with 2.0 acres, Parcel C is not required to be developed with a park.

29-2 Comment acknowledged. Providing recreational opportunities to teens is one of the primary components of the proposed park. Section VIJ, Recreation, states that the Pump House would be renovated to serve as a Recreation Center which may offer teens after-school and weekend activities. The Pump House would provide a public meeting room for various activities and may include video games, a pool table, Ping-Pong tables, food concessions and game rentals. Outdoor recreational equipment may also be available for rental. The Pavilion would also be available to stage music concerts, evening dances or other teen activities.

29-3 Comment acknowledged. There is no stop light proposed to be located on Cabrillo Boulevard near the center of the park. However, there is a non-signalized pedestrian crossing proposed from the Pump House across Cabrillo Boulevard to Chase Palm Park. This crosswalk is necessary to protect public safety so that pedestrians can safety cross Cabrillo Boulevard between the crosswalks provided at Santa Barbara and Salsipuedes Streets. Please refer to Figure III-3 for a depiction of the proposed pedestrian crossing.

Comment Letter 30

25 April 1993

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TO: City planning
re: youth Hostel on Cabrillo Blvd.

30-1 A Hostel is not a negative Thing as some residents fear. They obviously are underexposed and ignorant! I have traveled around the world and stayed at hostels in more Than 15 countries Most of Them are members of an international youth hostel association and follow Their Strict rules.

The image of a hostel as a flophouse is far from The truth! In exchange for The low cost of lodging, every visitor is

assigned a duty such as sweeping, cleaning counters or emptying trash cans. All hostels have a maximum length of stay allowed, anywhere from 3 days to 2 weeks.

30-1 cont. Whenever I meet international people travelling around the states, most are surprised that there is no hostel here. Many people just pass through for the day and stay in Carpinteria or Ventura due to lack of affordable (reasonable)

30-1 cont. lodging here in Santa Barbara.

Santa Barbara does not need another luxury hotel at this point - are we filling the ones we have now? (don't ~~forget~~ forget about the new Hyatt!) The parkers made a promise that was Just a lie to get their red lion built! It is apparent that they have let the property in question get very run down as a bargaining play - who doesn't want to fix up an eye sore?!

30-2

30-3 The city may want to contact the AYH (American

youth hostel association) to educate itself about hostel operation (I believe they are located in Long Beach) Find out the reality before giving into hysteria.

30-3 cont. I am a 13 year resident of Santa Barbara, my husband and I are both hardworkers and we are homeowners here. So you can wipe the image of lowlifes ~~from~~ as people who use hostels away.

feel free to contact me.

Jennifer MILLER BAKER
8059620176
706 E. Victoria Street
SB 93103

Response to Comment Letter 30

30-1 Comment acknowledged; no response necessary.

30-2 Comment acknowledged. The reviewer is referred to comment 11-17 in which Steve Wiley, Assistant City Attorney, explains the condition that requires a youth hostel to be developed.

30-3 Comment acknowledged; no response necessary.

Comment Letter 31

HOBO WOODS PARK/IMPERIALIST HOTEL/FIG TREE FLOPHOUSE-MOTEL
ENVIRONMENTAL REVIEW

The Draft Environmental Impact Report (DEIR) for the proposed Waterfront Park & Hotel and Youth Hostel Project contains the usual fictional, farcial, and fraudulent factoids, analysis, and illustrations analysts of these documents have come to enjoy. This particular DEIR has the added drawbacks of being too lengthly and repetitious. This epistle contains exposés of some elements contained in the DEIR for the edification of the unwary.

Santa Barbara does not need another "luxury" hotel to add to the already high vacancy rate experienced by the hotel/motel industry along the South Coast, particularly one trapped in such a "luxurious" site between the continuous roar and commotion of vehicles speeding along Cabrillo Boulevard and the intermittant roar of trains along the Southern Pacific Railroad (SP), and particularly one with an ersatz "Viceroy" theme much beloved by the closet monarchists and masochistic victims of imperialist invasions among City Hall Megalomaniacs. Santa Barbara does not need another failure like the Bankrupt Mall and Parker's Penitentiary (the Red Lion). What Santa Barbara needs is an expanded Hobo Woods Park to commemorate the site as a Hobo Campgrounds in the good old days when SP provided free transportation to/from the city for low-income visitors.

31-1

Does anyone at City Hall expect to get away with desecrating the Fig Tree Landmark with a cheap, 25'-high, ugly Youth Hostel mislocated only THREE feet from this arboreal monument? The Flophouse must be relocated elsewhere so that the Fig Tree will not be overrun by impoverished Floppers flopping in and around it and damaged by their assaults and building.

The Hobo Woods Park would be too fancy, too formalistic, too overdeveloped, and too expensive. A simpler plan is required rather than this makework, pork barrel, wastemoney scheme.

The entire environmental review process has become a makework, wastemoney extravaganza to enrich overpaid bureaucrats and consultants and promote whatever project is under scrutiny. Most of the significant environmental impacts have been allegedly mitigated into insignificance in this DE The impacts mentioned in this epistle still remain unmitigated and significant. Therefore, this project must be derailed. Deport Fess Parker to the Alamo where he belongs! Let Parker take the "Viceroy" and the Flophouse with him!

WRITTEN BY:
RICHARD A. STROMME
RAILROAD ADVOCATES
P.O. BOX 162
SANTA YNEZ, CA 93460
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APR 20 1993
CITY OF SANTA BARBARA
PLANNING DIVISION

20/4/93

A) HOBO WOODS PARK. The DEIR fails to provide solutions to the impacts associated with the Hobo Woods Park:

31-2 1) NOISE DEFLECTIONS. Perhaps no-one will use such a park contaminated by the noise, stench, and poisons from thousands of vehicles speeding by on Cabrillo Boulevard each day, just as no one uses the "park" in front of Parker's Penitentiary. The DEIR does not mention the necessity of a Wall constructed along the street to block the major source of noise.

31-3 As the railroad only produces noise when trains pass by, there is no justification for constructing an ugly 10'-12' Wall attempting to block the only real world activity in the area. The DEIR fails to mention this Wall blockage and the incorporation of the railroad, t freight yard and ice plant operations into the park design along with the low-income Hobos w once populated the area.

Any Wall will only continue the ugly Wall defining Parker's Penitentiary. The DEIR scribes must love Walls and hate the railroad. Railroad them to San Quentin!

31-4 2) ENDANGERING THE PUBLIC. The incompetence and negligence of the park "designers" and the City Hall Gang are revealed in the misbocation of an access road on the railroad right-of-way. Forcing motorists to travel about 20' from trains roaring by at to 40MPH places them at risk of being squashed by wayward equipment and cargo. SP much be reserved space to indulge in train wrecks and derailments and to maintain th tracks. The DEIR does not mention these subjects.

31-5 3) PARKING THE PARK. Wasting park space for 43 or more parking spaces is absurd particularly when there is a nearly empty parking lot across Santa Barbara Street. Obviously the only solution is to remove the parking spaces from the park and construct a garage acr the street for this and other waterfront activities. The DEIR fails to require this solution.

31-6 Bad planning further revealed in the scheme to convert the ex-Pump House into a meeting hall with few parking spaces. Some other fantasy must be concocted for this building. Th DEIR does not mention this problem.

31-7 4) HISTORICAL NEGLECT. The DEIR does not describe the railroad freight yard and refrigerator car icing operations conducted on this site and its use as a Hobo Campgrounds fo low-income visitors being displaced by high rollers and residents.

31-8 5) LUMBERING. The destructive Parker has already chopped down about 50% of the lar trees on the park site. Now the out-of-control lumberjack wants to chop down 98 of 186 on the site (20/2, 34/2). The DEIR does not mention punishment for Parker-like depredatio

31-9 6) GARDEN STREET REDESIGN. The DEIR does not provide plans and analyses of t proposed Garden Street Extension.

B) IMPERIALIST HOTEL. The DEIR contains the usual convoluted conjurings designe to justify the approval and construction of this "luxurious" ersatz Imperialist Hotel:

31-10 1) SALSIPUEDES GRADE CROSSING DERAILED. The proposal to subsidize Parker with the construction of a new grade crossing at Salsipuedes Street is not acceptable for railroad operations reasons. A grade separation will be required for an extended Salsipuedes Street paid for by Parker and SP. The DEIR fails to analyze this reality upon the hotel access and operations.

31-11 2) PARKING DEFICIT. The required number of parking spaces, 591, must be provided on site, or the hotel reduced in size. Off-site parking spaces would not be a realistic mode of operation. If Parker's Penitentiary started operating at full capacity there will be no "surplus" spaces to "donate" to the "Viceroy." Spaces mislocated north of the tracks would be too distan and inconvenient for use by this "luxury" hotel's guests (86/2-87/2).

The alleged 57-97 space deficit is Balderdash! (86/4). Try 200!

The DEIR fails to analyze the parking deficit and real solutions.

31-12 3) TRAFFIC CONGESTION. Traffic congestion in the area is already high. Hotel activit and operations will only ensure earlier gridlock. The fanciful analyses in the DEIR do n provide real solutions to the dilemma.

31-13 4) LAND MISUSE. Despite the blandishments of the greedy carpetbaggers occupying City Hal a far better use for this site would be a park for local residents. There are already too m empty hotel/motel rooms in the South Coast as tourists rightly avoid this overpopulated, over crowded, overdeveloped, etc., student ghetto and tourist trap. There is no need for another ov priced hotel catering to wastrels and wannabe "Viceroys." The DEIR fails to make the case justifying an ersatz "luxury" hotel here. The "Viceroy" could be another failure!

31-14 5) GROWTH INDUCING MANIA. The South Coast and County are already overrun by tourists who block the roads, hog the beaches, and generally degrade the quality of life once enjoyed by the natives, pseudo-natives, and carpetbaggers with seniority. We are not obligat to take in the refugees from the other Urban Wastelands of California merely because they foula their own nests with greed, stupidity, and insanity - the causes of the Growth Mania afflicting destroying the State. The DEIR fails to assess these issues.

31-15 6) THE EVE OF DESTRUCTION. No sane person would construct or occupy a hotel misloca only 75' from any railroad mainline. Even minor train wrecks and derailments could resul this "luxury" hotel's destruction from wayward 210-ton locomotives and 150-ton freight cars. wreckage usually ends up at least 100' from the tracks, sometimes as much as 200'. Explo and fires involving the increasing variety and quantity of hazardous materials transported b rail could incinerate and poison the hotel, the neighborhood, and their inhabitants.

31-16 The DEIR dismisses the possibility of catastrophe at this site as "Remote" (rating of 2) and t release of hazardous materials as "Serious but Confined" (rating of 3; 193/1-4, 194/1). A more realistic assessment would cite a rating of 4 "Likely," to occur during the facility lifetime, and severity rating of 4 "Severe," much loss of life and damage to property. This creates a risk produ of 16, in the "High Significance" category (190/4).

The Wall recommended in the DEIR will hardly be substantial enough to withstand the onslaught of a 5000-ton train (197/5). Nor will the Wall stop fire and gasses.

31-17 Naturally, the hotel's proponent, "Viceroy" Fess Parker, will not suffer the consequences of his folly. Society's Suckers will be forced to pay for any disaster at this hazardous site. Parker, who has helped destroy Santa Barbara as a better place to live, can no longer stand the South Coast and has moved to the Santa Ynez Valley where he can carry on his greedy and destructive activities Viceroy fashion.

31-18 7) NOISE FOREVER. Trains rumbling by the "luxury" hotel will not be appreciated by non-railroader guests attempting to sleep only 75' away. AMTRAK's maintenance yard operations also create noise while providing real-world attractions for tourists desperate to escape the ersatz plasticity of traps like the "Viceroy." The DEIR fails to inform the analyst how a 10'-12' ugly wall will block locomotive noise emanating 16' above the track from the hotel's second and third stories.

31-19 Given the continuous roar of vehicles along Cabrillo Boulevard, a Wall constructed here will be needed to block the racket. The DEIR does not analyze this necessity.

31-20 8) OVERPOPULATION. Another hotel will only attract more ex-guests to move to the already overpopulated South Coast whose quality of life has already been grossly degraded over the past forty years. The DEIR neglects to mention this topic. The solution to most area problems is to deport the carpetbaggers back home.

31-21 9) HISTORICAL NEGLECT. The DEIR does not describe the railroad freight yard and refrigerator car icing operations conducted on this site.

31-22 10) TIDAL WAVE. As in Hawaii a hotel mislocated on the shore will be washed away in the next major storm. The DEIR does not mention hurricanes.

31-23 11) LUMBERING. The destructive Parker has chopped down most of the large trees on the hotel site in anticipation of its construction. The DEIR does not mention punishment for this out-of-control lumberjack.

31-24 C) YOUTH HOSTEL: The DEIR contains no valid analysis of impacts upon the Fig Tree/Landmark caused by Flophouse construction and operation. Instead, we find Balderdash and the dismissal of impacts with absurd arguments:

1) FIG TREE ATTACKS - DESECRATING A LANDMARK:

a) UPON THE TREE. The ugly, cheap, 25'-high Flophouse would be mislocated only about THREE feet from the Tree's branches and perhaps on top of its roots. This fact is dismissed with the statement - so what, the Tree is merely being incorporated into the Flophouse's landscaping (179/4)!

31-25 Who gave Parker and the Hostel promoters leave to steal the Tree for their own selfish misuse? No mention is made in the DEIR about the necessity to chop off Fig Tree branches (still growing) to clear the Flophouse. Possible root damage is ignored with the false claim that 10' ditches on Chapala Street revealed no roots (188/1). Roots might still grow under Chapala and the site.

31-26 The close proximity of the Flophouse to the Tree is being hidden in the fraudulent drawing (blamed upon a computer) where the Tree appears to be about 30'+ from the Flophouse (15/F).

b) SEE THE TREE. No mention is made in the DEIR about the ugly, obtrusive backdrop to the Tree the Flophouse would be for viewers in Fig Tree Park and traveling east on Montecito Street. In admitting that ⅓ (more like ½) of the Tree would be blocked by the Flophouse for westward travelers on Montecito Street the remaining portion of the Tree renders the blockage as less than

31-27 significant (180/4). This ugly structure mislocated only 3' from the Tree would destroy the Tree's open setting with an artificial, obtrusive monstrosity.

c) HARMING THE TREE. The Fig Tree will become a magnet for the 50-150 allegedly impoverished Floppers staying at the Flophouse. These destructive Floppers

31-28 will be Flopping in and around the Tree, damaging roots and branches. This probability is dismissed in the DEIR with the ridiculous claim that low-paid, low-grade Flophouse workers will control the mob gathered under the Tree (189/3).

How strange that the same City Hall Gang who were complaining about us Bums

31-29 hanging around and damaging the Tree some years ago are lusting to import more Bums to continue the attacks upon this important Landmark.

The DEIR scribes "solution" to this problem is not to relocate the Flophouse, but to insult and abuse the 99.99% of the public who are not harming the Tree and further desecrate this Landmark by

31-30 removing the grass (and planting concrete?) and fencing this portion of the Railroad Station park. The Fence Mongers have already made a mighty effort to Fence the Tree which was rejected by almost everyone, including the Landmarks Committee and City Council (189/3).

2) HOSTEL ATTACKS:

a) BLOWING IT UP. A Flophouse mislocated about 125' from the railroad mainline might be blown up or burned out in the next railroad disaster. There are about 10,000-15,000 train wrecks and derailments each year in this country. The DEIR dismisses the possibility of catastrophe at this site as "Remote" (rating of 2) and the release of hazardous materials as "Serious but Confined" (rating of 3, 193/1-4, 194/1). A more realistic assessment would cite a rating of 4 "Likely", to occur during the
31-31 facility lifetime, and a severity rating of 4 "Severe", much loss of life and damage to property. This creates a risk product of 16, in the "High Significance" category (190/4).

Despite a claim to the contrary the incidence of train derailment has nothing to do with the double track operation in the area (193/2). Double tracks could compound a disaster here – a derailment on one track could cause a collision with another train on the other track.

The DEIR scribes also underestimate the possibility of train/Flophouse contact by claiming that train wreckage is confined within 80' of the tracks (193/4). Not always! Wreckage can easily end up 100', even 200' from the track, well within range of the Flophouse.
31-32

No mention is made in the DEIR to the exposure of the Flophouse and occupants to fires, explosions, and hazardous materials from highway disasters occuring only about 80' away on the 101 Wasteway.

b) NOISE RACKET. The fraudulent analysis designed to decrease the noise level at the Flophouse begins with the false claim this building would be located 130' from the tracks (141/4). Elsewhere the DEIR
31-33 scribes claim a closer 125' (190/2). Which is correct? Or is it 170'-190' (149/3)?

Another fictional factoid is the claim that the eight local train movements at the Railroad Station would not affect the Flophouse because the locomotives at the east end of these trains stop near State St. (148/4, 149/2). Upon occasion the locomotive is placed at the west end of the local trains (or at both ends) and stops just west of Chapala Street. About 50-60% of the local trains stop at the Station and continue westward to the metropolis of West Santa Barbara and return through the Station to the
31-34 ANY and near Salsipuedes Street because AMTRAK/SP have failed to install a mainline crossover at MP

Consequently, noise impacts from train operations will be greater than claimed in the DEIR.

The number of both passenger and freight trains will increase in the future, also increasing the noise level upon the Flophouse.

The continuous roar of vehicles on the 101 Wasteway only 80' from the Flophouse will make
31-35 the Flophouse an unpleasant place to reside and thus discourage its use no matter what numerical conjurings concocted by the DEIR scribes to cover up the racket.

c) LAND MISUSE. The proposed Flophouse site will be needed for Railroad Station parking in future as train frequency and ridership increase. The Redevelopment Gang is now conspiring to steal the
31-36 Station for misuse as a public parking lot/garage, a use incompatible with station operation and unacceptable. The neighborhood tourist traps can be subsidized by other means, by removing their victims off the Station site and onto the Flophouse and other sites.

d PARKING GALORE. Hotels are supposed to appeal to hikers, bikers, and horse riders (there are no stables shown on the plans) yet 27 parking spaces are proposed. A "hotel" does not need 27 spaces!
31-37 Evidently, the Flophouse is to become a cheap motel appealing to impoverished auto travelers and their junk vehicles. There are already hundreds (thousands?) of empty hotel/motel rooms available in the depressed,

overbuilt South Coast market, obviating the alleged need for a hostel. A more realistic assessment of hostel parking needs is required in the DEIR, along with a horse analysis and economic justification for the hostel and throw in an analysis of train riders who might be attracted to the hostel. The South Coast is alrea
1-37 cont. overrun by student vermin - two, three, four times too many of the bruggers! Why attract more of the usually low income people to the South Coast? They will not be spending much money at Nordstroms! Why don't the impoverished stay home where they belong? The South Coast needs more middle class people and institutions, not more "idol" rich carpetbaggers and impoverished students and bums to displace the native and pseudo-native residents!

e) ESTHETIC WASTE. The ugly, cheap Flophouse/Motel would be incompatible with the Fa
31-38 Tree, Railway Express Agency and Station Depots, Neal Hotel Building, etc. e.g. no tile roof, despite false claims to the contrary (177/4, 179/2-3).

There is no need to chop down the few remaining trees on this site (177/2).

f) FLOODING. The Flophouse probably will be flooded out and rendered inoperable during the
31-39 next Mission Creek rampage. The DEIR does not analyze this reality nor inform the reader how high above the existing grade level or sidewalk level the Flophouse floor level would be (probably about 3'; 16/5)

2014173

Dear Jan Hubbell,

Please add this page to my earlier epistle.

Dick Stromme
P.O. Box 162
Santa Ynez, CA 93460

D) ADDITIONAL ISSUES.

31-40 1) The Flophouse south property line may be located 10' northward (13/F).

31-41 2) What are the fanciful Railroad Station "preservation proposals" mentioned? (22/1)

31-42 3) Exactly where are the DEIR geniuses going to relocate the railroad, etc? (31/4) How strange that these anti-railroad pulversives are not demanding the relocation of Cabrillo Boulevard, 101, etc! Let's deport the carpetbaggers who compiled this DEIR. No doubt they are the same culprits who conspired to destroy the Railroad Station, and LOST.

31-43 4) The DEIR scribes falsely claim that only one large tree exists on the Flophouse site plus three smaller pine trees (177/2). These four trees are about the same size. They must be retained. There are also 2 wierd-looking ornamental trees that have sprun up about two feet from the two pine trees not mentioned in the DEIR.

31-44 5) The DEIR expanders have enlarged the Fig Tree by falsely claiming that the canopy extends 163' to 171' from the trunk (186/1). 80'-90' is more accurate. They also claim that the roots extend another 20'-40'. The Fig Tree Report does not mention these figures.

31-45 6) It seems improbable that the Flophouse would use less water than a vacant lot or gas station (213/2). The water use fantasies must be recalculated for the hotel, park, and hostel. No doubt much more would be wasted than is claimed in the DEIR.

31-46 7) This DEIR is too full of errors and faulty analyses and too lengthy to bother listing all of them. If anyone wants a complete revision of this DEIR — SEND MONEY! It's not worth wasting hundreds of hours to correct this fairy tale.

31-47 8) The DEIR does not mention the benefits of replacing the hotel with an expanded Lobero Woods Park. This is the environmentally superior alternative.

31-48 9) The DEIR neglects to inform readers that Parker, the Great Viceroy, is responsible for the trash, junk, hundreds of truckloads of rotten fill, etc, covering the park/hotel site. Let Parker clean up and maintain the area instead of blackmailing the public with this mini disaster area to approve of his grandiose project. City Hall could clean up their area too.

31-49 10) This DEIR is inadequate and incomplete and does not properly analyze the potential environmental impacts, nor does it provide mitigations for the identified impacts much less the ones ignored and glossed over.

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APR 26 1993

CITY OF SANTA BARBARA
PLANNING DIVISION

Response to Comment Letter 31

31-1 Comment acknowledged; since the majority of this comment is not directed to specific portions of the EIR, no response is necessary. In regard to impacts to the Moreton Bay Fig Tree, the Biological Resources section concluded that no significant, adverse impacts would result due to construction of the proposed hostel. The site has been previously developed and no significant impacts to the tree occurred at that time. The analysis in the Biological Resources section is based on information contained in John Britton and Denice Froelich's "Moreton Bay Fig, Santa Barbara, California" report and on conversations with the City Arborist, Dan Condon. Because the reviewer provides no evidence to disprove the assessment of these recognized arborists, the text has not been revised.

31-2 Comment acknowledged; please see revised text discussing noise impacts from Cabrillo Boulevard traffic on the proposed park. It should also be noted that the highly utilized Chase Palm Park exists directly south of Cabrillo Boulevard and is exposed to the same traffic noise as the park and hotel site. Chase Palm Park is utilized by over 1 million persons per year. The proposed park has been specifically designed to provide more usable and meaningful open space than is provided in front of the Red Lion Resort.

31-3 Comment acknowledged. The proposed acoustic wall to be located along the northern boundary of the park site is required to reduce noise levels within the proposed park to acceptable levels when trains are passing by the park. As for the incorporation of the railroad, the freight yard and demolished Puritan Ice Company Plant in the proposed park, conclusions made within the EIR do not require the incorporation of the above structures/uses into the proposed park.

31-4 Comment acknowledged. The Risk of Upset section addresses potential accidents that could occur due to train derailment or wrecks. The probability of such accidents is anticipated to be remote; however mitigation measures designed to enhance public health and safety have been required.

31-5 Comment acknowledged. It is City policy to provide parking on-site and/or off-site in close proximity to the use which generates the parking demand. In this case, the proposed park does not provide all of the parking spaces which park users would demand on weekends during special events. Rather than decrease the amount of park space by increasing the number of on-site parking spaces, additional parking would be provided off-site. Extension of Garden Street would provide additional street parking to meet the remaining parking demand created by the proposed park. City staff is currently analyzing future parking development in the Waterfront Area, and one of the options being considered is construction of a parking structure on the existing parking lot on the west side of Santa Barbara Street. However, since no definite plans for additional parking development are available at this time, no new parking plans are analyzed in this EIR.

31-6 Comment acknowledged. Although the proposed Pump House would contain a public meeting room for various activities, the primary use of the Pump House would be a Recreation Center, not a meeting hall. In addition, the Traffic, Circulation and Parking section of this EIR adequately addresses potential parking impacts. As mentioned in the Traffic, Circulation and Parking section, other than the six parking spaces proposed at the Pump House, additional parking for all park uses would be provided on-site at the northwestern site boundary, as well as at the proposed Mason Street lot and the existing Santa Barbara Street lot. As well as providing parking spaces for the

park users, the proposed Pump House's drop off area (vehicle turn around) is anticipated to be utilized primarily by motorists dropping off and picking up patrons of the Recreation Center.. In addition, when meetings are held at the Pump House, it is anticipated that 20 parking spaces would be demanded, as a result of the relatively small size of the Pump House meeting room. Nevertheless, the traffic engineers who analyzed the project do not feel that a significant, adverse parking impact would occur for this park component because the majority of meetings would not occur during peak periods and other parking in the Waterfront Area would be available to supplement the parking supplied at the Pump House.

31-7 Comment acknowledged. The DEIR adequately addresses historical uses of the park and hotel site within the Historic Resources section. The uses mentioned no longer exist on-site and their remnants are not considered to be significant historical resources.

31-8 Comment acknowledged. Vegetation removal was conducted by the City of Santa Barbara for public safety reasons, as well as to protect the physical health of remaining vegetation. In addition, a large portion of the trees proposed for removal were determined to be physically or structurally unhealthy and should be removed, according to arborist Bill Spiewak's Tree Management Plan Report contained in Appendix G of this EIR. Trees and vegetation proposed for removal with development of the proposed park would be mitigated by the park's proposed landscaping.

31-9 Comment acknowledged. The Garden Street extension is not part of the proposed Waterfront Park, Hotel and Hostel project. Plans for the Garden Street extension were not submitted to the City Planning Division until after the Administrative Draft EIR for the proposed project was completed. The Garden Street extension is analyzed in a cumulative scenario of the Traffic, Circulation and Parking section.

31-10 Comment acknowledged. Plans for the Salsipuedes Street Extension are on file with the City's Public Works Department and can be reviewed by the public. The EIR accurately assesses the impacts of the Salsipuedes Street extension and potential impacts to the proposed hotel. The existing Chapala Street at-grade crossing will be closed in exchange for the new at-grade crossing at Salsipuedes Street.

3-11 Comment acknowledged. When considering the parking demand for the proposed hotel, it is important to remember that hotels are multiuse complexes containing guest rooms, meeting rooms, restaurants, bars and lounges. Since the peak parking demands of these components of a hotel occur at different times of day, the peak parking demand of a hotel as a whole is subject to substantial variation. In addition, there are wide annual fluctuations in room occupancy and non-guest use of the other hotel components (meeting rooms and restaurants). The reviewer has not provided any evidence to explain why 200 parking spaces would be needed as opposed to the 100 additional parking spaces which the EIR requires. The requirement that the applicant provide an additional 100 off-site parking spaces is based on actual parking counts taken during periods of peak use at the Red Lion Resort. Based on the two-year survey period at the Red Lion Resort, it was determined that even during special events, the hotel would almost always have a surplus of 230 parking spaces. The reviewer is referred to the Traffic, Circulation and Parking section for further information.

31-12 Comment acknowledged. The Traffic, Circulation and Parking section within this EIR requires implementation of required mitigation measures that would improve traffic operating conditions in

the Waterfront Area above existing levels, even with the addition of the proposed project and the cumulative list of projects.

31-13 Comment acknowledged. The proposed park would be for local residents and tourists alike. According to the Economic and Fiscal Analysis section prepared by Economic Research Associates, there is a demand for a five star luxury hotel within the City of Santa Barbara and South Coast area.

31-14 Comment acknowledged; however, no response necessary.

31-15 Comment acknowledged. The Risk of Upset and Hazardous Materials sections within this EIR adequately address the potential for train wrecks and associated hazards. In addition, the typically slow speed at which trains (passenger and freight) pass by the park and hotel site would not result in 210 ton locomotives and 150 ton freight cars being launched 200 feet from the tracks, except under the most unusual circumstances which are remote enough to remain insignificant.

31-16 Comment acknowledged; please see response to Comment 31-15. The reviewer has not provided any information to prove why the potential hazards should be reclassified.

31-17 Comment acknowledged. The EIR does not state that the northern wall should stop run-away trains; the EIR states that the rear wall shall be designed and constructed in a manner which provides for the optimum resistance to damage from train car collision. No response necessary to the remainder of the comment.

31-18 Comment acknowledged. The Noise and Vibration section within this EIR adequately addresses potential noise impacts on the proposed hotel resulting from railroad operations and the reviewer is referred to that section for further information. Specifically, the EIR requires the use of acoustically upgraded windows capable of reducing noise levels below 45 dB within hotel guest rooms.

31-19 Comment acknowledged; please see revised text.

31-20 Comment acknowledged. Analyzing the possibility of former tourists moving to Santa Barbara is beyond the scope of this EIR and it is beyond the control of the City government. American citizens have the right to live in the location of their choice; therefore, it would be meaningless to provide the analysis requested.

31-21 Comment acknowledged. Because the old freight yard currently does not meet the City's criteria for designation as a historic resource, impacts to any potential remains of the old freight yard and refrigerator car icing operations would be insignificant.

31-22 Comment acknowledged. Although the proposed park and hotel site is located within a tsunami run up area, the Initial Study prepared on the proposed project by City's Planning Division scoped out the possibility of significant impacts resulting from a tsunami. Please refer to the Initial Study contained within Appendix A of this EIR for additional information regarding the potential for significant tsunami impacts to occur.

31-23 Comment acknowledged; please see response to Comment 31-8.

31-24 Comment acknowledged; please see response to Comment 31-1.

31-25 Comment acknowledged; please see response to Comment 31-1.

31-26 Comment acknowledged. Figure III-6 is a simulated computer rendering that is provided to the reader for architectural illustrative purposes only. Please refer to Figure III-5, Hostel Site Plan for an accurate location of the Moreton Bay Fig Tree drip line in relation to the proposed hostel.

31-27 Comment acknowledged. The Aesthetic Resources section contained within this EIR adequately addresses the proposed hostel's visual compatibility with the Moreton Bay Fig Tree. In addition, it is the report preparer's non-biased opinion that the visual backdrop provided by the proposed hostel would be a visual benefit as compared to the existing backdrop, which consists of the exterior wall of the building located adjacent to the hostel site's eastern boundary. A gas station was previously located on the hostel site and the City's General Plan envisions future commercial use on the site.

31-28 Comment acknowledged; please see response to Comment 31-1. In addition, please see revised text in the Biological Resources section regarding monitoring of activities around the Fig Tree.

31-29 Comment acknowledged; no response necessary.

31-30 Comment acknowledged; please see response to Comment 31-1.

31-31 Comment acknowledged. The Risk of Upset analysis was based on information obtained from Mr. Jim Bamler of Southern Pacific Transportation Company and from the risk analysis contained in the certified EIR for the Fiesta Park project. The reviewer provides no evidence to support the statements made, therefore the text has not been revised. Mitigation measures designed to enhance public health and safety in the event of a disaster are required by this EIR.

31-32 Comment acknowledged. The required mitigation measures contained in the Risk of Upset section and designed to enhance public health and safety would also provide protection in the event of the accidents mentioned in the comment. Examples of the measures required are the provision of fire sprinkler systems, installation of smoke detectors, use of fire retardant materials and preparation of safety procedures and evacuation routes. See also response to Comment 31-15.

31-33 Comment acknowledged. The inconsistency related to the distance of the hostel site to the railroad right-of-way is a result of the measurements taken from different locations within the project site (i.e., from the proposed building footprint as opposed to the actual property line). The text within the Risk of Upset section has been revised to illustrate that the proposed hostel site's southern property boundary is <u>approximately</u> 150 feet from the railroad right-of-way.

31-34 Comment acknowledged. However, the occasional placement of the locomotive on the west end of the train or the occasional stopping of the train west of Chapala Street would not be significant when analyzed on the basis of the overall DNL. As for the increase in future trains, the Noise and Vibration section contained in this EIR adequately addresses the potential noise impact associated with two new trains. In addition, the increase in train traffic is anticipated to be between Santa Barbara and other southern localities. The frequency of noise would increase as the number of trains increase but the intensity of each sporadic noise episode would not be expected to increase with additional trains. Since the mitigation measures required in the EIR would reduce train noise

to less than significant levels, the addition of new sporadic noise episodes from additional train trips would not create significant impacts.

31-35 Comment acknowledged. However, acoustically upgraded windows required as mitigation measures within the Noise and Vibration section of this EIR would reduce U.S. Highway 101 noise on the proposed hostel to less than significant levels.

31-36 Comment acknowledged. The General Plan designation for the hostel site is General Commerce and the zoning designation is Hotel-Related Commerce. There is no requirement that the hostel site be used for parking. Renovation of the railroad station is a separate project which will undergo separate environmental review. Provision of adequate parking for the railroad station would be evaluated once a project application is submitted to the City Planning Division.

31-37 Comment acknowledged. However, horse stables are not a requirement with the development of a hostel. In addition, the mode of transportation utilized by hostel patrons varies with each geographical area, and the number of travelers on horseback who would utilize the proposed hostel is anticipated to very limited, due to the lack of access. Given the physical characteristics and primary modes of transportation in southern California and the south coast area, it is anticipated that the majority of patrons would utilize trains, buses or automobiles to reach Santa Barbara. As for the actual number of parking spaces proposed at the hostel, the 27 spaces are required by City Parking Ordinances. With regard to the economic justification for the proposed hostel and the amount of students living within the South Coast, these comments do not pertain to environmental issues and no response is necessary.

31-38 Comment acknowledged. Because the proposed hostel site is located within the El Pueblo Viejo Landmark District, the architectural style must be consistent with the requirements of City Zoning Ordinance 22.22.104, Required Architectural Styles. In addition, the architecture of proposed hostel would ultimately be approved by the City's Architectural Board of Review, which would also ensure that the proposed hostel is visually consistent with the surrounding structures within the El Pueblo Viejo Landmark District. The Site Plan prepared for the proposed hostel by Cearnal Elhen Associates indicates that the hostel's roof parapet would be made of mission tiles. Therefore, the information provided in Comment 31-38 regarding the DEIR's false claims of a tile roof on the hostel is inaccurate. Four of the existing seven trees located on the hostel site would have to be removed because they are located within the building footprint of the proposed hostel. The loss of these trees would be mitigated by the applicant's proposed landscape plan for the hostel, which includes the planting of 8 new trees and associated landscaping.

31-39 Comment acknowledged. As discussed within the DEIR, the floor elevation would be approximately two feet above the 100-year flood zone and the elevation of the proposed grade would be approximately one foot above the existing grade. Therefore, potential flooding impacts associated with the location of the proposed hostel within the 100-year flood zone have been mitigated to a level of insignificance.

31-40 Comment acknowledged; however, no response necessary because no evidence is provided that the property line is misrepresented.

31-41 A number of proposals for railroad station have been presented to the City over the years. All information pertaining to development proposals are available for public review and are on file at the City Community Development Department.

31-42 Comment acknowledged; however, no response necessary.

31-43 Comment acknowledged; please see revised text.

31-44 Comment acknowledged. The text has been revised to correctly state the size of the fig tree's canopy. With regard to the absorbing roots extending 20 to 40 feet beyond the tree's canopy, it is unknown exactly how far the fig tree's absorbing roots extend beyond the canopy. However, the overall size of the tree would suggest that the absorbing roots would be anticipated to extend 20 to 40 feet beyond the tree's canopy.

31-45 Comment acknowledged. The discussion of Water Resources contained in the Impacts Not Found Significant section of this EIR accurately assesses water use associated with the proposed project. In addition, Comment 31-45's claim that water usage would be much higher has not been supported by material utilizing accepted water demand and use factors; therefore, the text has not been revised.

31-46 Comment acknowledged; no response necessary.

31-47 Comment acknowledged. According to State CEQA Guidelines, The Alternatives section should describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, and evaluate the comparative merits of the alternatives. A "Hobo Woods Park" would not meet the basic objectives of the proposed project and is not assessed as an alternative to the proposed project. In addition, proposing 13 acres of contiguous land within the City's Waterfront District to be developed with a "Hobo Woods Park" is not a reasonable or realistic alternative.

31-48 Comment acknowledged. The EIR accurately presents the environmental setting of the proposed park and hotel site. In addition, a mitigation measure in the Hazardous Materials/Wastes section requires each applicant to clean their site of hazardous materials contained on their respective property. The City can not require Mr. Parker to clean City-owned property because there is no nexus to warrant such a requirement.

31-49 Comment acknowledged. The report preparers have used their best efforts to prepare a complete and concise, non-biased environmental document. The impact analysis assesses several environmental impacts and recommends/requires several mitigation measures capable of reducing most impacts to insignificant levels.

XIII. RESPONSES TO COMMENTS

This section provides responses to letters of comment on the proposed project by the public and several agencies. Responses to each comment letter are provided directly after each comment letter A number of pertinent questions and comments regarding the information and analysis contained in the Draft EIR were received during the public review of this document. Copies of the comments received and responses to those comments are exhibited on the following pages.

LIST OF PUBLIC AGENCIES, ORGANIZATIONS AND PERSONS COMMENTING ON THE DRAFT EIR

Comment Letter	Author
1	Robert J. Dayton, Senior Transportation Planner, City of Santa Barbara Transportation Division
2	Bobbie Bratz, Air Quality Specialist Supervisor, Santa Barbara Co. Air Pollution Control District
3	William F. Yim, Transportation Planner, Santa Barbara Co. Association of Governments
4	Michael Powers, Deputy Director, Santa Barbara Co. Association of Governments
5	Wayne B. Schnell, Intergovernmental Review Coord., California Dept. of Trasportation
6	Janice M. Hubbell, Project Planner, City of Santa Barbara Planning Division.
7	Janice M. Hubbell, Project Planner, City of Santa Barbara Planning Division.
8	Teri H. Malinowski, Planner, City of Santa Barbara Redevelopment Agency John Cahill, Parker Family Trust
9	Teri H. Malinowski, Planner, City of Santa Barbara Redevelopment Agency John Cahill, Parker Family Trust
10	Marti Schultz, Supervising Enginner, City of Santa Barbara Public Works Department

Comment Letter	Author
11	Robert Hansen, Tomi Sollen, Norris Goss, Steve Wiley, Tom Gerig, Oral Comments on the Draft EIR from the Environmental Review Committee meeting of April 16, 1993
12	Nina Oshinsky, Member Environmental Review Committee
13	Richard C. Johns, Parks and Recreation Dir., City of Santa Barbara Parks and Recreation Dept.
14	Tom Gerig, Member Environmental Review Committee
15	Greg Mohr, Member Environmental Review Committee
16	Dallas Holmes, Special Counsel, Santa Barbara Schools District
17	Linda Krop, Staff Attorney, Environmental Defense Center
18	Antonio R. Romasanta, Beachside Merchant's Association
19	Marilyn Loperfido, Chairperson, Santa Barbara Arts and Crafts Show Advisory Board
20	Creig Alan Dolge, South Coast Land Use Committee
21	Jon E. Clark, Executive Dir., Community Environmental Council
22	David Tabor, AICP, David Tabor & Associates
23	Richard G. Battles, Mullen and Henzell
24	Greater Santa Barbara Lodging Association
25	Patricia Douglas, Private Citizen

Comment Letter	Author
26	Leonia Langelo, Private Citizen
27	Selma Rubin, Private Citizen
28	Miriam Flacks, Private Citizen
29	Kae A. Mori, Private Citizen
30	Jennifer Miller Baker, Priviate Citizen
31	Richard A. Stromme, Private Citizen

XIV. REFERENCES AND SOURCES

1.0 Report Preparation Team

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Tiffany A. Campbell, Associate Environmental Planner
Lisa Plowman, Associate Environmental Planner
Ron Palmieri, Environmental Analyst
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Subcontractors

Omni-Means (Traffic, Circulation and Parking)
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Economic Research Associates (Economic and Fiscal)

2.0 Persons Contacted

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Cearnal, Brian, Architect, Cearnal Ehlen Associates
Celano, Joe, Walker, Celano & Associates
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Days, Mary Louise, Assistant Planner, City of Santa Barbara Planning Division
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Faris, Robert, Associated Transportation Engineers
Girvin, George, Landscape Architect, George W. Girvin Associates Incorporated
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Langsev, Terilynn, Principal Planner, City of Santa Barbara Planning Division
Lapso, Robert, Controller, Red Lion Resort
Lee, Bill, Senior Vice President, Economics Research Associates
Marsolais, John, Project Geologist, Fugro-McClelland West
Malinowski, Teri, Assistant Planner, City of Santa Barbara Housing and Redevelopment Division (applicant)
McDowell, Lawton, Southern Pacific Transportation Company, Safety Division
Nickelson, George, Branch Manager, Omni-Means Engineers and Planners
Olson, Don, City Planner, City of Santa Barbara Planning Division
Phillips, Donald R., Former Owner, Puritan Ice Company
Poire, Cindy, Penfield and Smith Civil and Transportation Engineers
Prince, Bob, Southern Pacific Transportation Company, Engineering Division
Rosenblatt, Mindy, archiTrek Computerized 3 Dimensional Architectural Renderings
Russell, Joan, City Parks and Recreation Department
Schnell, Wayne, Intergovernmental Review Coordinator, CALTRANS - District 5
Sipiala, Mitch, Assistant Director of Human Resources, Biltmore Hotel
Tuma, Rob, Omni-Means Engineers and Planners
Walker, Bruce, Walker, Celano & Associates
Wilcoxon, Larry, Wilcoxon Archaeological Consultants
Woodcock, Jim, Public Relations Representative, Anheuser Busch Company, St. Louis, Missouri
Wubbena, Doug, Representative, Southern Pacific Transportation Company

3.0 Organizations Contacted

American Institute of Architects Archives
California Native Plant Society, Channel Islands Chapter
Martin, Northart & Spencer, Incorporated
Public Utilities Commission
Puritan Ice Company
Santa Barbara - City Division of Land Use Controls
Santa Barbara - City Public Works Department
Santa Barbara - City Waterfront Department
Santa Barbara - County Hall of Records
Santa Barbara - County Surveyor's Office
Santa Barbara - Public Library
Santa Barbara - Historical Society, Gledhill Library
Santa Barbara - Mission Archives
Santa Barbara - News-Press Library
Southern Pacific Transportation Company
UCSB Special Collections Department
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5.0 Maps and Drawings

1852	Map of the Port of Santa Barbara, U.S. Coastal Survey.
1870	Map of the Town of Santa Barbara and Vicinity, U.S. Coast and Geodetic Survey.
1878	Sketch of the City of Santa Barbara, 1870 Survey showing Changes and Improvements to January 1878, U.S. Coast and Geodetic Survey.
1889	Sanborn Property Ownership Map, Santa Barbara.
1911	(ca.) Station Map, Santa Barbara, Lands, Tracks and Structures, Southern Pacific Railroad Company.
	Right-of-Way and Track Map, Main Line, Southern Pacific Railroad Company-
1924	Elevations of Pump and Screen Plant for Outfall Sewer, City of Santa Barbara. Detail of Pump and Screen Plant for Outfall Sewer, City of Santa Barbara, 2 drawings.
1930	(updated to 1946) Sanborn Fire Insurance Map, Santa Barbara.

XV. Appendices

A. Initial Study
B. Project Description Information
C. Traffic/Circulation and Parking Information
D. Air Quality Information
E. Noise and Vibration Information
F. Visual/Aesthetics Information
G. Biological Resources Information
H. Alternatives Information

Appendix A

Initial Study

INITIAL STUDY ENV92-0107

WATERFRONT PARK/HOTEL/HOSTEL

APPLICANT AND PROPERTY OWNER NAME AND ADDRESS

Proposed Park -

Agent:	Teri H. Malinowski, City of Santa Barbara Redevelopment Agency, 630 Garden St., Santa Barbara, CA 93101
Owner:	City of Santa Barbara, 735 Anacapa St., Santa Barbara, CA 93101 Southern Pacific Transportation Company, 1200 Corporate Center Dr., Suite 100, Monterey Park, CA 91754 Parker Family Trust, P.O. Box 806, Los Olivos, CA 93441

Proposed Hotel -

Agent:	John Cahill, 4304 Hunt Club Lane, Westlake Village, CA 91361
Owner:	Parker Family Trust, P.O. Box 806, Los Olivos, CA 93441 Red Lion Hotels and Inns, P.O. Box 1027, Vancouver, WA 98666

Proposed Hostel -

Agent:	Brian Cearnal, Cearnal Ehlen Associates, Inc., 523½ State St., Santa Barbara, CA 93101
Buyer:	Parker Family Trust, P.O. Box 806, Los Olivos, CA 93441
Owner:	Lagomarsino Family Trust/Hazel Lafler, 3810 Transport St., Ventura, CA 93003

PROJECT ADDRESS AND LOCATION (See Vicinity Map.)

325 E. Cabrillo Boulevard:	Bounded by Cabrillo Blvd., Salsipuedes Street, Southern Pacific Railroad (SPRR) tracks and Santa Barbara Street and a parcel at the southwest corner of Mason and Santa Barbara Streets adjacent to the SPRR tracks.
33 W. Montecito Street:	At the southeast corner of Montecito and Chapala Streets across Chapala Street from Moreton Bay Fig Tree Park.

PROJECT DESCRIPTION The applicants propose to develop:

Hotel and Parking Lot:

1. A 150 room luxury hotel with a 147 seat formal dining room, 52 seat lounge, 167 seat outdoor dining area, 2,200 s.f. banquet room, 1,525 s.f. of meeting rooms, 5,000 s.f. second floor outdoor terrace for special events, 612 s.f. of retail use and a guest health facility with 245 underground parking spaces on a

3.0 acre site and an off-site parking agreement with Fess Parker's Red Lion Resort to provide up to 200 additional parking spaces for special events; AND

Park and Parking Lot:

2. A 10.11 acre park with 63 parking spaces, of which 20 spaces will be provided off-site on a parcel northwesterly of the intersection of Santa Barbara and Mason Streets, a 32 "seat" carousel, water elements incorporating Laguna Channel, children's play areas and a pavilion for outdoor events. The Laguna Channel, a disturbed riparian habitat and coastal brackish marsh, will be restored and expanded. Approximately 504 s.f. of coastal brackish marsh will be removed and about 6,000 s.f. of brackish marsh and riparian habitat will be created or restored. The City Pump and Screen Plant, presently used for City offices, will be enlarged from its present 1,800 s.f. to 3,010 s.f. to provide offices for park staff, storage, a first aid station, food concessions, a public meeting room, public restrooms and recreation equipment rental. Public restrooms will also be provided near the west end of the park as part of a proposed plaza area. An unsignalized pedestrian crossing is proposed across Cabrillo Boulevard approximately 1,000 feet east of Santa Barbara Street. More detail is provided in the Project Description (Attachment 1).

The following approvals are requested for the Waterfront Park and Hotel Project:

A) A Specific Plan Amendment to allow development of a hotel on Parcel B of Specific Plan No. 1 and to expand the land area of the Specific Plan to include APN 17-010-34 and a portion of 17-010-46 between Santa Barbara Street, the westerly edge of the existing Specific Plan area, Cabrillo Boulevard and the railroad tracks (SBMC Chapter 28.08);

B) A Modification of zoning regulations to allow the applicant to provide 245 parking spaces for the hotel instead of the required 519 spaces (SBMC §28.90.100);

C) A Conditional Use Permit for a parking lot in the HRC-2 zone for use by the proposed park (SBMC §28.22.040);

D) A Coastal Development Permit for development of a park and hotel in the Appeal Jurisdiction of the Coastal Zone (CDP92-0045) (SBMC §28.45.009); and

E) A Development Plan Approval (SBMC §28.87.300).

Hostel

The applicant proposes to develop a 9,762 s.f., 75 bed hostel on a vacant 0.55 acre site previously occupied by a 2,200 s.f. automobile service station. It would be operated by American Youth Hostels or a similar non-profit organization.

The following approvals are requested for the proposed hostel:

A) A modification of the zoning regulations to allow the first story of a two story building to encroach ten (10) feet into the required 20 foot front yard setback on Montecito Street (SBMC § 28.22.060);

B) A Coastal Development Permit for development in the Non-Appealable Jurisdiction of the Coastal Zone (CDP92-0045) (SBMC §28.45.009); and

C) A Development Plan Approval (SBMC §28.87.300).

Vegetation:	A variety of introduced trees through the western two-thirds of the property (primarily eucalyptus and cypress). An area of low-quality riparian habitat along Laguna Channel and a low-lying flooding area to the east of the channel.
Surrounding Uses:	North: SPRR tracks, manufacturing and storage uses, wastewater treatment plant East: Salsipuedes Street, Fess Parker's Red Lion Resort (parking, public park, tennis club and a small number of rooms are closest to site) South: Cabrillo Boulevard, Chase Palm Park, ocean, Stearns Wharf West: Santa Barbara Street, Public parking lot

<u>Hostel</u>

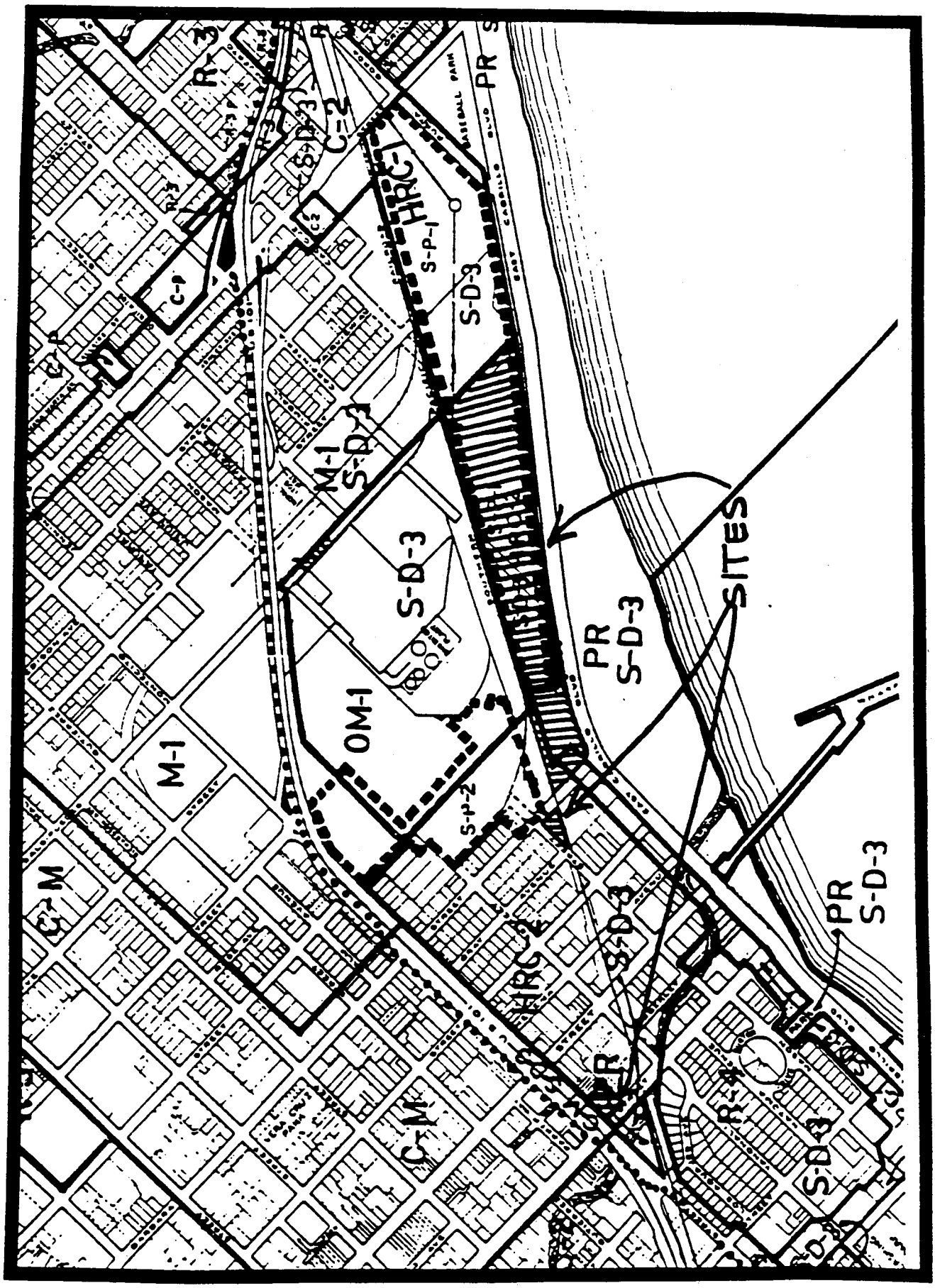
Assessor's Parcel Numbers:	33-042-01,-02,-03 and -04
Parcel Size:	23,800 s.f. (0.55 ac.)
Current Zoning:	HRC-2, S-D-3 - Hotel and Related Commerce 2, Coastal Overlay Zone
General Plan Designation:	Hotel and Related Commerce II
Existing Use:	Vacant, previously a full service gas station
Proposed Use:	75 bed hostel, 9,762 s.f. 27 parking spaces
Access:	From Montecito Street
Slope:	Flat
Vegetation:	7 existing trees along property perimeter
Surrounding Land Uses:	North: Montecito Street, U.S. Hwy. 101 East: Retail (bicycle shop, auto parts store) South: Retail (bicycle shop), Amtrak Station West: Chapala Street, Moreton Bay Fig Tree Park

ENVIRONMENTAL SETTING (Site characteristics including: slope, vegetation, surrounding land uses, existing structures, and physical constraints.)

Hotel and Park (See Project Description and Proposed Amended Specific Plan, Attachments A and B, for more information)

Assessor's Parcel Numbers:	17-010-34, 35, 36, 42 and 46, 17-111-01, 17-192-03, 33-010-07
Parcel Size:	13.107 acres
Current Zoning:	HRC-2, S-D-3, SP-1 - Hotel and Related Commerce 2, Coastal Zone Overlay, Specific Plan No. 1
General Plan Designation:	Open Space, Parking, Buffer/Stream, Hotel and Related Commerce II
Existing Use:	Vacant except for 1,800 s.f. pump and screen plant used as City Waterfront Dept. offices, 3,400 s.f. industrial building, outdoor industrial storage area, 15 parking spaces and 30,833 s.f. Ice House demolished in 1991. The site at the northwest corner of Santa Barbara and Mason Streets is vacant.
Proposed Use:	150 room, 143,559 s.f. luxury hotel on 3.0 acres with: 147 seat formal dining room 52 seat bar/lounge 167 seat outdoor informal dining area 2200 s.f. ballroom/banquet room Meeting rooms totaling 1525 s.f. Second floor terrace with 5,000 s.f. of multi-purpose area 612 s.f. retail Guest health facility 245 subterranean valet parking spaces in an additional 83,166 s.f. (one level) 10.107 acre park with: 1,864 s.f. restrooms/maintenance/storage on west end 738 s.f. restrooms and storage adjacent to Pump and Screen Plant Pump and Screen Plant converted for use as Recreation Center 352 s.f. Snack bar 32 animal carousel Water elements Passive and active play areas Multi-purpose pavilion with sound system in The Great Meadow
Access:	Hotel: Driveway on Salsipuedes Street near Cabrillo Boulevard for guest and employee parking; Service access from Salsipuedes Street adjacent to railroad tracks Park: Small parking area and turn-around point near recreation center; parking area access from Santa Barbara Street south of railroad tracks for on-site parking; parking access from Mason Street for off-site parking
Slope:	Less than 5%

VICINITY MAP



INITIAL STUDY CHECKLIST

INTRODUCTION

This checklist is to be completed for all projects which are not exempt from environmental review under the California Environmental Quality Act (CEQA). The information, analysis and conclusions contained in the checklist is the basis for deciding whether an Environmental Impact Report (EIR) or Negative Declaration (ND) is to be prepared. Additionally, the checklist shall be used to focus an EIR on the effects determined to be potentially significant.

This checklist is being used for all parts of this project including the park, hotel, hostel and off-site parking.

The following checklist indicates the potential level of impact and is abbreviated as follows:

Known Sig.: Known significant environmental impacts.

Unknown Poten. Sig.: Unknown,potentially significant impacts which need further review to determine significance level.

Poten. Sig. and Mitig.: Potentially significant impacts which can be mitigated to less than significant levels.

Not Sig.: Impacts which are not considered significant or no impact.

1. AIR QUALITY:

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. The violation of any ambient air quality standard, a substantial contribution to an existing or projected air quality violation including, CO hotspots, or exposure of sensitive receptors to substantial pollutant concentrations (emissions from direct, indirect, mobile and stationary sources)?	___	✓	___	___

ROC 3.43 lbs/pk. hr. NOx 4.02 lbs/pk. hr.

b. The creation of objectionable smoke, ash or odors?	___	___	___	✓
c. Dust generation?	___	✓	___	___

Impact Discussion: The MEA indicates the park and hotel site to be in an area of sensitive receptors (i.e., persons under 5 years and over 65 years of age). As discussed in more detail in the Transportation/Circulation section of this Initial Study, this project contributes traffic to intersections that already exceed acceptable levels of service thus resulting in contributions to already known CO hotspots. The hostel will be near the freeway which may result in air quality impacts on the guests. In addition, traffic may result in exceedence of acceptable levels of RHC and NOx, leading to violations of air quality thresholds. Also, because of other projects proposed, but not constructed, in the Waterfront area, there is the potential for significant cumulative air quality impacts as a result of this and other pending projects or other approved and not yet constructed projects. Finally, the significant amount of grading proposed, as well as project construction, will likely result in short-term impacts on air quality, especially particulates. In conclusion, there is the potential for both short and long term, project-specific and cumulative air quality as a result of this project.

Mitigation and Residual Impact: To be determined in the EIR.

Recommended Monitoring: To be determined in the EIR.

2. BIOLOGICAL RESOURCES:

Describe existing plant and animal communities/conditions: Although the MEA maps show park and hotel site to have Urban vegetation, a closer look reveals that there is a Riparian habitat along the Laguna Channel and a small flooding back-up area parallel to Cabrillo Boulevard, immediately to the east of the channel. See the Botanic Report submitted by the Applicant (Attachment C) for more detail.

The proposed hostel would be located across the street from Moreton Bay Fig Tree Park, a designated Landmark. The dripline for this tree extends across Chapala Street over the edge of this property. The root system may also extend into the property.

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. A loss or disturbance to a unique, rare or threatened plant or animal community?	___	✓	___	___

b.	A reduction in the numbers or restriction in the range of any unique, rare or threatened species of plants or animals?				✓
c.	A reduction in the extent, diversity, or quality of native vegetation (including brush removal for fire prevention and flood control improvements)?				✓
d.	An impact on non-native vegetation whether naturalized or horticultural?		✓		
e.	The loss of healthy specimen trees?		✓		
f.	Introduction of herbicides, pesticides, animal life, human habitation, non-native plants, or other factors that would change or hamper an existing habitat?				✓
g.	A reduction in the numbers, a restriction in the range, or an impact to the critical habitat of any unique, rare, threatened, or endangered species of animals?				✓
h.	A reduction in the diversity or numbers of animals on site (including mammals, birds, reptiles, amphibians, fish or invertebrates)?		✓		
i.	A deterioration of existing fish or wildlife habitat (for foraging, breeding, roosting, nesting, etc.)?				✓
j.	Introduction of barriers to movement of any resident or migratory fish or wildlife species?				✓

k. Introduction of any factors (light, fencing, noise, human presence and/or domestic animals) which could hinder the normal activities of wildlife?

___ ___ ___ ✓

Impact Discussion: According to the Botanic Report submitted by the Applicant (attachment C), the project will result in the loss of about 500 s.f. of low quality coastal brackish marsh. No zoologic report on fauna has been submitted. It appears, however, that the proposed restored and expanded wetland habitat, as part of Laguna Channel improvements, may offset this potential loss. The final determination, taking into account faunal issues, should be made as part of an environmental impact report. In addition, as outlined in the Tree Management Plan (Attachment D), of 186 existing trees, 98 trees are proposed to be removed, most of them eucalyptus and myoporum trees. The Landscape Plan shows that 441 additional trees will be planted consisting of conifer, shade, accent and palm trees. The proposed removal of a substantial number of trees will result in a substantial change to the existing character of the site. Presently, these trees contribute to a major skyline effect in the area and are an important part of the visual experience of driving along Cabrillo Boulevard or walking at the beach. While Staff does not believe the type of trees lost is significant, they are important as skyline trees and there are concerns about the aesthetics involved in the loss of trees which may be a significant impact (See Visual).

The construction of the hostel may result in impacts on the Moreton Bay Fig Tree, westerly across Chapala Street from the project. An arborist's report prepared for the City indicates that most of the roots are oriented to the south and west and a sewer line constructed on the west side of Chapala Street encountered very few roots. In addition, the construction of the hostel will require that the site be elevated about two feet due to its location in a flood plain. The site was previously paved so that there was no water percolation to any roots in this area. This may serve to buffer the roots from construction impacts; however, it may also result in compaction of the root zone which might result in significant impacts to the tree, especially when considered cumulatively with the proposed relocation of Mission Creek on the west side of the tree.

In conclusion, this project may result in significant impacts from the loss of skyline trees and impacts on fauna. The project may also have significant cumulative impacts on the Landmark Moreton Bay Fig Tree.
The EIR should focus on faunal issues and loss of trees at the hotel and park site and on project-specific and cumulative impacts on the Moreton Bay Fig Tree at the hostel site.

Mitigation and Residual Impacts: To be determined in the EIR.

Recommended Monitoring: To be determined in the EIR.

3. CULTURAL RESOURCES:

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. ARCHAEOLOGICAL RESOURCES:				
1. Disruption, alteration, destruction, or adverse effect on a recorded prehistoric or historic archaeological site (note site number below)?		✓		
2. Distribution or removal of human remains?				✓
3. Increased potential for trespassing, vandalizing, or sabotaging archaeological resources?				✓
4. Ground disturbances in an area with potential cultural resource sensitivity based on the location of known historic or prehistoric sites?		✓		
b. ETHNIC RESOURCES:				
1. Disruption of or adverse effects upon a prehistoric or historic archaeological site or property of historic or cultural significance to a community or ethnic group?				✓
2. Increased potential for trespassing, vandalizing, or sabotaging ethnic, sacred, or ceremonial places?				✓
3. The potential to conflict with or restrict existing religious, sacred, or educational uses of the area?				✓

c. HISTORIC RESOURCES:

1. Disruption of or adverse effects upon a prehistoric or historic archaeological site or property of historic or cultural significance to a community or ethnic group?	___	✓	___	___
2. Beneficial impacts to a historic resource by providing rehabilitation, protection in a conservation/open easement, etc.?	___	✓	___	___

Impact Discussion: The MEA identifies the park and hotel project site as having the potential for pre-historic and Native American resources as well as historic resources from the early 20th century. The hostel site is shown as having the potential for prehistoric and Native American resources as well as historic resources from the 1870s. Much of the park and hotel site was reviewed for archaeological resources (Phase 1 study) by Larry Wilcoxon as part of the Fiesta Park EIR (Attachment E). The conclusion was that the previous project had the potential to result in impacts on the site of Shore Acres, a former resort community near the present-day intersection of Salsipuedes Street and Cabrillo Boulevard. The Phase 2 Study necessary to determine the site's significance was not completed. The present project also has the potential to impact this site. It will be necessary to complete the Phase 2 analysis as part of the EIR.

Painted Cave Associates recently prepared a Phase 1 archaeological assessment of the properties not originally included in the report prepared by Mr. Wilcoxon (the City-owned parcel at Santa Barbara Street and Cabrillo Boulevard and properties owned by Southern Pacific north and south of the railroad tracks adjacent to Santa Barbara Street). This Phase 1 report (Attachment F) concluded that the likelihood of significant archaeological sites is minimal, but recommended that an archaeologist be present during all excavation on the site. A Phase 1 analysis has also been prepared for the hostel site (Attachment G) and concludes that there is no potential for significant archaeological impacts at this site; however, it also recommends that an archaeologist be present on site during any excavation.

The Puritan Ice Company Building (owned by the Parker Family Trust), a designated Structure of Merit, was demolished in 1991 at the order of the City Chief of Building and Zoning due to its deteriorated and dangerous condition. Prior to demolition, the building was documented and recorded as outlined in the report prepared by PHR Consultants as part of the Fiesta Park EIR. The Fiesta Park EIR concluded that its loss results in a significant historical resources impact and required that the building either be saved and incorporated into the project design or that, prior to demolition, the building be documented and recorded and that elements of the building, such as doors and special equipment, be incorporated into the project design. In 1991, the Chief of Building and Zoning ordered the demolition of the Ice House due to its unsafe condition. The mitigation measures outlined by the Fiesta Park EIR were imposed as conditions on the demolition by the Landmarks Committee. The building was documented and recorded prior to its demolition. However, the applicant has not stated whether or not any building elements were preserved and how they would be incorporated into the project design.

The City Pump and Screen Plant was determined to be an architecturally significant building in the Fiesta Park EIR. This building is proposed to remain as part of the present project and will be reused as a recreation center. There will also be additions constructed on the northwesterly and southeasterly sides. Since this building was determined to be significant by virtue of its architecture, the additions could result in a significant effect on the building's architectural integrity.

The potential remains for significant impacts on the architectural integrity of the City Pump and Screen Plant and the loss of the Ice House has not been mitigated to a level of insignificance. In addition, the extent of the impact on the Shore Acres archaeological site is yet to be determined.

Mitigation and Residual Impacts: The following mitigation measure applies to archaeological resources on the park site:

1. The Owner shall submit a signed contract or other acceptable evidence of completion of the following to the Division of Land Use Controls prior to issuance of any Building or Grading Permit:

   A qualified archaeologist shall be present during all ground disturbing activity associated with the proposed project, including but not limited to, grading, excavation, brush removal and ground clearance, demolition of buildings and removal of pavement. In the event that prehistoric or historic features, artifacts or other remains are encountered, all work in the area of the find shall be halted until the nature and significance of ;the find can be determined and the Environmental Analyst shall be notified. If the findings are potentially significant, a Phase 3 recovery program shall be prepared and accepted by the Environmental Analyst and the Landmarks Committee. That portion of the Phase 3 program which requires work on-site shall be completed prior to continuing construction in the affected area. If prehistoric or other Native American remains are encountered, a Native American representative shall be contacted and shall remain present during all further subsurface disturbance in the area of the find. A final report on the results of the archaeological monitoring shall be submitted to the Environmental Analyst within 180 days of completion of the monitoring and prior to the issuance of the Certificate of Occupancy.

The mitigation measures and residual impacts will be determined in the EIR for the Shore Acres site and the City Pump and Screen Plant.

Recommended Monitoring: To be determined in the EIR.

4. ENERGY:

Will the Proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. Substantial increase in demand, especially during peak periods, upon existing sources of energy?	___	___	___	✓

b. Requirement for the development of new sources of energy or expansion of existing facilities?	___	___	___	✓

Impact Discussion: While this project will generate a need for energy for construction and operation, it is well within the ability of the various utilities to provide the necessary energy. In addition, the Applicant has included an energy conservation program for the project which further reduces projected energy needs (Attachment H). CEQA requires that discussion of energy conservation issues be included in the EIR (not necessarily as an impact issue). As part of this discussion, solid waste issues related to pre- and post-consumer waste reduction will be addressed.

Mitigation and Residual Impact: None required.

Recommended Monitoring: The implementation of the energy conservation program will be reviewed for compliance during plan check of the plans and specifications after the application for building permits is submitted.

5. GEOLOGIC PROCESSES:

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. Exposure to or production of unstable earth conditions such as landslides, earthquakes, liquefaction, soil creep, mud slides, ground failure (including expansive, compressible, collapsible soils), or similar hazards?	___	___	✓	___
b. Disruptions, displacements, compaction or overcovering of the soil by cuts, fills, or extensive grading?	___	___	✓	___
c. Permanent changes in topography?	___	___	___	✓
d. The destruction, covering or modification of any unique geologic, paleontologic, or physical features?	___	___	___	✓

e. Any increase in wind or water erosion of soils, either on or off the site?				✓
f. Changes in deposition or erosion of beach sands or dunes, or changes in siltation, deposition or erosion which may modify the channel of a river, or stream, or the bed of the ocean, or any bay, inlet or lake?				✓
g. Excessive grading on slopes of over 20 percent?				✓
h. Sand or gravel removal or loss of topsoil?				✓
i. Vibrations, from short-term construction or long-term operation, which may affect adjoining areas?		✓		
j. Excessive spoils, tailings or over-burden?				✓

Impact Discussion: The MEA indicates that the hotel and park site is in an area of high liquefaction potential. The MEA also indicates that this project is in an area of low to moderate damage to one to three story structures and requires that a geologic report be prepared by a qualified expert. The project includes about 23,100 cubic yards (cu.yds.) of excavation and 39,500 cu.yds. of fill. The primary purpose of excavation is to create the proposed underground parking area for the hotel. Fill will be used for compaction and to bring the site up to the elevation necessary to keep habitable areas outside the 100-year flood zone. A preliminary geotechnical study has been prepared (Attachment I) and includes recommendations for grading, compaction and construction techniques. These recommendations have been incorporated into the mitigation measures. In addition, mitigation measures related to geologic processes were incorporated into the Specific Plan requirements (VII.D.1), as follows:

1. Geology

Prior to the issuance of building permits, the applicant shall submit a revised geotechnical report. This report should relate specifically to the submitted plan and address at a minimum:

a. The recommended design earthquake magnitude, the engineering characteristics of this earthquake (i.e., maximum ground acceleration, duration of strong shaking, etc.) including the effects of site conditions, and its likelihood of occurrence. Site effects may include changes in near surface conditions that will occur as a part of grading.

b. Measures to be implemented to reduce the potential for liquefaction beneath the proposed structures to a level that is consistent with hazard reduction policies of the City.

c. Measures to be implemented to reduce settlement to amounts that can be accommodated by the proposed site improvements (i.e., structures drainage devices, etc.).

This report shall be reviewed by an independent qualified Engineering Geologist and a Soils Engineer retained by the City to ensure that the measures proposed meet the intent of City policies regarding hazard reduction. The design earthquake characteristics as developed in this report shall be taken into account by the structural engineer in the design of the proposed site improvements.

According to the preliminary geotechnical study, hotel construction will require the use of driven friction piling. This could result in potentially significant vibration impacts on surrounding areas during construction and should be discussed in the EIR.

The hostel site is in an area of conditional or questionable liquefaction potential. It includes 2,000 cu.yds. of fill in order to meet elevation requirements for development in a flood zone. The elevation will be increased about one (1) foot over the existing grade. A soils report will be required at the time of submittal for a building permit by the Division of Land Use Controls and the recommendations of that report will be required to be included in the building plans.

Mitigation and Residual Impact: With the implementation of the recommendations contained in the preliminary geotechnical study and the final geotechnical and soils reports required by the Specific Plan and the Division of Land Use Controls, no significant geological impacts are expected to occur. However, it will be necessary to evaluate the impacts of vibration during construction in the EIR.

Recommended Monitoring: Monitoring will be handled by the Division of Land Use Controls (DLUC) when the plans for grading and building permits are submitted for review and issuance. Inspections by DLUC staff will also occur during grading (cut and fill) operations, as well as during project construction.

6. HOUSING:

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. Loss of existing affordable dwellings through demolition, conversion, or removal?				✓
b. Displacement of current residents?				✓

c. An effect on existing housing or create an additional demand for additional housing?

___	___	✓	___

Impact Discussion: The development of the park, hotel and hostel will generate demand for additional housing. The potential demand will be calculated in the growth-inducement section of the EIR.

Mitigation & Residual Impact: The project will be required to meet the provisions of the Housing Mitigation Ordinance.Meeting the requirements of the Housing Mitigation Ordinance is a requirement of Development Plan Approval and is, therefore, a part of the project description. The applicants will determine which option they are choosing under the ordinance (construction of affordable housing off site or payment of fees) at a later date. No significant impacts will result.

7. LAND USE:

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. Structures and/or land-use incompatible with existing land-use?	___	___	___	✓
b. The induction of substantial growth or concentration of population?	___	___	___	✓
c. The extension of sewer trunk lines or access roads with capacity to serve new development beyond this proposed project?	___	___	___	✓
d. The loss of a substantial amount of open space?	___	___	___	✓
e. Establishment of a use which would substantially diminish or impair long term productivity of the environment?	___	___	___	✓

f. Creation of an inconsistency with existing plans and policies?

Yes ✓ Maybe ___ No ___

Discussion: The General Plan and Local Coastal Plan designations for the hotel and park site are for future park use. The zoning designation is HRC-2, S-D-3, SP-1, Hotel and Related Commerce 2, Coastal Overlay Zone, Specific Plan #1.

Specific Plan #1 (Park Plaza) was adopted in 1985 and states that the primary use for this site (Parcels B and C of the Specific Plan) is for public recreation and open space with parking. However, the City cannot require that the property be used for a park so long as it is privately owned. The secondary use allowed by the Specific Plan is for visitor-serving and residential uses. While this property is zoned HRC-2 (Hotel and Related Commerce 2), the currently adopted Specific Plan has placed restrictions on the property which expressly prohibit hotel and motel uses. The applicant is requesting a Specific Plan Amendment in order to allow the construction of the proposed 150 room hotel.

The General Plan and Zoning designation for the hostel site is for Hotel and Related Commerce II which allows hotels, restaurants, galleries and other visitor serving uses. The hostel is consistent with these designations; however, the applicant is requesting a setback modification along Montecito Street.

The issues of land use plans and policies consistency will be addressed in the EIR for this project as well as growth inducement. Induced growth is within that predicted and planned for by the General Plan.

8. NOISE:

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. Long-term exposure of people to noise levels exceeding City thresholds?		✓		
b. Short-term exposure of people to noise levels exceeding City thresholds?		✓		
c. Project-generated substantial increase in the ambient noise levels for adjoining areas (either day or night)?				✓

Impact Discussion: The MEA indicates that current noise levels at the hotel and park site range between 60 and 75 dB(A) CNEL and are between 75 and 80 dB(A) CNEL at the hostel site. Most of this noise is generated from adjacent roadways and from the railroad. The threshold of significance for transient lodging (hostel and hotel) is 70 dB(A) CNEL and for a park ranges from 60 to 65 dB(A) CNEL. The two sites clearly exceed the threshold and a potential for significant noise impacts exists. In addition, the park includes public spaces at the proposed Plaza and Great Meadow areas where performances involving amplified music may occur. This could potentially have a significant impact on hotel guests. Finally, there may be significant noise and vibration impacts on users of adjacent properties during construction of the proposed project.

Mitigation and Residual Impact: No mitigation has been proposed at this time. A determination of the actual noise levels and mitigation measures will be included in the EIR.

9. PUBLIC SERVICES:

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. DRAINAGE				
1. Substantial increase in storm water runoff?	___	___	___	✓
2. Aggravation of an identified drainage problem or creation of a new one?	___	___	___	✓
b. FIRE PROTECTION				
1. Establishment or expansion of a permanent use in high fire hazard area.	___	___	___	✓
2. Substantial increase of expenditures for fire protection?	___	___	___	✓
3. Exposure of people to hazardous wastes/materials?	___	___	___	✓
c. POLICE PROTECTION				
1. Substantial increase in expenditures for police protection?	___	___	___	✓
d. PARKS AND RECREATION				
1. Addition of a substantial number of people to an area where existing parks and recreation facilities are inadequate?	___	___	___	✓

2. Conflict with established recreation uses of the area?	___	___	___	✓
3. Conflict with biking, equestrian and/or hiking trails?	___	___	___	✓
e. SCHOOLS				
1. Substantial increase in the number of school children in the attendance area?	___	___	___	✓
2. Aggravation of an existing facilities overcrowding problem?	___	___	___	✓
3. A negative impact on student access routes to or from school property during normal working hours?	___	___	___	✓
f. SEWERS				
1. Substantial increase in sewage generation? 20,810 gal/day.	___	___	___	✓
2. Aggravation of an identified sewer system problem or creation of a new one?	___	___	___	✓
g. SOLID WASTE				
1. Substantial increase in solid waste generation?	___	___	___	✓

Impact Discussion: Most public services have the capacity to handle the proposed project. Pertinent areas are discussed in more detail below.

A preliminary hydrologic and hydraulic report which assesses water movement and drainage on the park and hotel site has been prepared. New drainage facilities will be provided on the park and hotel site. The "Meadow" area will act as a local retention basin which will overflow into an existing storm drain in Salsipuedes Street. the remainder of the park area will drain to either Laguna Channel or the proposed "Lagoon" area where it will be

pumped to the channel. The hostel site will continue to drain to existing drainage facilities in the area. No significant drainage impacts are expected to occur at either site.

The proposed hotel and hostel will result in increased demand on public recreation, especially in the Waterfront area. This increased demand will be mitigated by the proposed park.

Construction of this project will place more people in close proximity to the Southern Pacific Railroad tracks. Substantial amounts of a variety of hazardous materials are conveyed by rail. In the event of a leak or other rail accident, there would be an increased risk of exposure and need for participation in the clean-up by the City Fire Department. In discussions with Fire Department representatives, they have indicated that the increase in the number of people in the area would not change the operational aspects of their response except in the area of evacuation. An evacuation plan is required for the hotel and hostel and the Fire Department or other cooperating agency would conduct a sweep of the park area to evacuate people. No additional Fire Department personnel would be required. No significant impacts on public services are expected to occur.

10. RISK OF UPSET/HAZARDOUS MATERIALS:

a. In the known history of this property, have there been any past uses, storage, or discharge of hazardous materials? (Examples of hazardous materials include, but are not limited to, fuel or oil stored in underground tanks, pesticides, solvents, or other chemicals.)

Yes ✓ Maybe ____ No ____

b. Will the proposed project involve the use, storage, or distribution of hazardous or toxic materials?

Yes ____ Maybe ____ No ✓

Discussion: The hostel site was used as an automobile service station for many years and included underground gasoline storage tanks. Information has been submitted that shows that the property owner has cleaned this site in accordance with Federal, State and local standards. Initial testing shows that concentrations of toxic substances are within the standards established by the State and County Departments of Health Services. Results of a second test have not been received, but are expected to confirm this conclusion. Evaluations have also been prepared for the hotel and park site. They conclude that source determination and clean up of unrefined petroleum hydrocarbons will be required on both the City-owned and Parker Family Trust properties and that lead contamination remediation will be required on properties owned by the Parker Family Trust. The two parcels owned by the Southern Pacific Railroad have not yet been tested. Testing and cleanup of any contamination is required by local, State and Federal law prior to construction on the site. A complete summary of the results of hazardous waste analysis and the actions necessary to remediate any contamination found will be included in the EIR for informational purposes.

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
c. A risk of an explosion or the release of hazardous substances (including, but not limited to oil, gas, biocides, bacteria, pesticides, chemicals or radiation) in the event of an accident or upset conditions?		✓		
d. Possible interference with an emergency response plan or an emergency evacuation plan?				✓
e. The creation of a potential public health hazard?				✓
f. Public safety hazards from oil or gas pipelines or oil well facilities?				✓
g. Exposure to hazards from oil or gas pipelines or oil well facilities?				✓
h. The contamination of a public water supply?				✓

Impact Discussion: Because of the project's location near the railroad tracks, there is a potential for significant impacts from explosion or leakage of hazardous substances if a train accident were to occur. In addition, there is the potential for train derailment to result in injuries to park and hotel users and facilities. The Fire Code requires that the hotel and hostel have an emergency evacuation plan and that evacuation routes be posted throughout the hotel and hostel. See previous discussion under Public Services regarding emergency response for additional information.

Mitigation and Residual Impact: To be determined in the EIR.

Recommended Monitoring: To be determined in the EIR.

11. TRANSPORTATION/CIRCULATION:

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. Generation of substantial additional vehicular movement (daily, peak-hour, etc.) in relation to existing traffic load and capacity of the street system? 1610 ADT 146 Peak Hour	✓			
b. A need for private or public road maintenance, or need for new road(s)?				✓
c. Effects on existing parking facilities, or demand for new parking? Zoning Requirement Demand; Hotel/Park 544 - 567 403; Hostel 23 27		✓		
d. Substantial impact upon existing transit systems (e.g. bus service) or alteration of present patterns of circulation or movement of people and/or goods?				✓
e. Alteration to waterborne, rail or air traffic?				✓
f. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians (including short-term construction and long-term operational)?		✓		

g. Inadequate:

sight distance?	___	___	___	✓
ingress/egress?	___	___	___	✓
general road capacity?	___	___	___	✓
emergency access?	___	___	___	✓

Impact Discussion: Preliminary traffic and parking analyses have been prepared for all three major components of the project (Attachments J, K and L). These reports indicate that the hotel and park would generate 1,610 ADTs and 146 PHTs. The parking requirement for the hotel and park ranges from 544 to 567 parking spaces, depending upon how the use of the second floor outdoor terrace at the hotel is assessed (See Attachment M for a detailed breakdown). The Applicant is proposing to provide 313 spaces. The hostel is required by the Zoning Ordinance to provide 23 parking spaces. Parking demand is 27 spaces and 27 spaces are proposed.

The preliminary traffic analyses for the park and hotel indicate that there are likely to be significant traffic impacts at the Castillo Street/Montecito Street, Milpas Street/U.S. Hwy. 101 NB, Milpas Street/U.S. Hwy. 101 SB/Indio Muerto Street and Cabrillo Boulevard/U.S. Hwy. 101 intersections. While traffic impacts are evident, mitigation measures are less clear. Improvements are now scheduled for completion at the Castillo/Montecito intersection which are likely to improve circulation to an acceptable level of service. Measure D funds have been set aside for the intersections at Milpas/U.S. Hwy. 101; however, there are questions about the ability of the proposed improvements to actually reduce traffic congestion to an acceptable level. Cabrillo/U.S. 101 improvements are not scheduled to occur until CalTrans constructs a six-laning project from Milpas Street to San Ysidro Road. This is scheduled to begin in 1997. An EIR is presently being prepared for that project.

The amount of parking required by the zoning ordinance for the hotel is 496 to 519 spaces. The proposal is to provide 245 valet parking spaces in a single level of subterranean parking on-site and to reach an agreement with the adjacent Red Lion to provide 200 additional spaces for special events. The preliminary parking analysis indicates that the proposed parking supply for the hotel and park is adequate to meet parking demand; however, staff has concerns in two areas: First, staff is concerned that parking demand be met for both the Red Lion and the proposed hotel even when both facilities are holding significant events. Second, staff is concerned that the parking proposed for the park may be inadequate to meet the demand. Our primary concern is centered around the use of the passive park factor from the San Diego Association of Governments (SANDAG) Traffic Generators Manual for the passive areas of the proposed park. We believe that the SANDAG factor may be based on large rural regional parks covering hundreds of acres with minimal vehicle access to the majority of the park. This use is not comparable to the passive areas of a smaller urban park which are easily accessible and have the potential to be heavily used and scheduled for major events.

The hostel is able to meet its parking demand on site. The traffic demand from the hostel is substantially less than that of the previous automobile service station use. No traffic or parking impacts from the hostel are expected to occur.

In conclusion, staff believes that this project has the potential to result in significant project-specific and cumulative traffic and parking impacts. This discussion will include a range of scenarios and mitigation measures. It will also be necessary to separate the park impacts from the hotel impacts.

Mitigation and Residual Impact: To be determined in the EIR.

Recommended Monitoring: To be determined in the EIR.

12. VISUAL:

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. The obstruction of any scenic vista or view open to the public, or will the proposal result in the creation of an aesthetically offensive site open to public view?		✓		
b. Change to the visual character of an area?		✓		
c. Glare or night lighting which may affect adjoining areas?				✓
d. Visually incompatible structures?				✓

Impact Discussion: The park and hotel were reviewed at joint meetings of the Architectural Board of Review and the Landmarks Committee on March 20, and April 15, 1991 (hotel only), May 15, 1991 (park only) and on August 19, 1991 and March 18, 1992 (park and hotel together) (Attachment N). The members of the two committees expressed concern that the park and hotel stand separately so that the park does not look like it is part of the hotel grounds. However, they are generally in support of the direction of the hotel design. They are concerned that there are too many areas and activities proposed in the park area.

The hostel was reviewed by the Landmarks Committee on July 22, 1992 (Attachment O). The Committee was pleased with the design direction and supported the setback modification along Montecito Street. They also suggested the use of more trees in the proposed design.

The park and hotel involve the removal of 98 trees and the planting of 441 new trees. In addition, a three-story hotel that will be up to 45 feet in height above existing grade is proposed. The loss of existing trees could impact the more distant views of the site until the new trees have grown enough to qualify as skyline trees. However, the net increase of over 300 trees and the addition of the hotel could also result in significant viewshed impacts on near views. In addition, the project could result in the obstruction of existing views of the Riviera and mountains from Cabrillo Boulevard (a potential scenic highway) and Chase Palm Park.

The proposed hostel will be much closer to the Landmark Moreton Bay Fig Tree and to Montecito and Chapala Streets than the previous gas station was. This may result in an impact on views of the Fig Tree.

The EIR will assess the short-term impacts of tree loss on near views and the long-term impacts of additional trees and the hotel on both near and distant views as discussed above. In addition, impacts of the hostel on views of the Moreton Bay Fig Tree will be assessed.

Mitigation and Residual Impact: To be determined in the EIR.

Recommended Monitoring: To be determined in the EIR.

13. WATER RESOURCES/FLOODING:

Will the proposal result in:	Known Sig.	Unknown poten. Sig.	Poten. Sig. and Mitig.	Not Sig.
a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters?				✓
b. Changes in percolation rates, drainage patterns or the rate and amount or surface water runoff?				✓
c. Change in the amount of surface water in any water body?				✓
d. Discharge into surface waters, or alteration of surface water quality, including but not limited to temperature, dissolved oxygen, turbidity, or thermal water pollution (e.g., eutrophication)?				✓
e. Alterations to the course or flow of flood waters, or need for private or public flood control projects?				✓
f. Exposure of people or property to water related hazards such as flooding (placement of project in 100 year flood plain), accelerated runoff or tsunamis?			✓	

g.	Alteration of the direction or rate of flow of groundwaters?	___	___	___	✓
h.	Change in the quantity of groundwaters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations of recharge interference?	___	___	___	✓
i.	Overdraft or overcommitment of any groundwater basin? Or, a substantial increase in the existing overdraft or overcommitment of any groundwater basin?	___	___	___	✓
j.	The substantial degradation of groundwater quality including saltwater intrusion?	___	___	___	✓
k.	1. The use of substantial quantities of water? 40.03 AFY - Hotel and Park 2.76 AFY - Hostel	___	___	___	✓
	2. Substantial reduction in aquifer recharge?	___	___	___	✓
	3. Substantial water quality degradation?	___	___	___	✓

Impact Discussion: The proposal to restore Laguna Channel and add wetlands will result in a change to the flow of flood waters on site. Presently, Laguna Channel flows through the site to the ocean. When storm flows occur, water backs up into low areas of the site and may stand for several days or weeks. The applicant proposes to create three separate water elements as part of the project. Laguna Channel would flow and operate as it does presently; however, the banks would be modified and wetland species would be planted along the edges. The new Lagoon area would be to the west of the channel and further from Cabrillo Boulevard than the current overflow area (which would be filled in). Water would normally be supplied by a combination of potable water and brackish water pumped from the underground parking garage; however, it would also accommodate flood flows from Laguna Channel. Finally, the area known as The Wilds includes "creeklets" which would be supplied with filtered and chlorinated potable water so that children could play in the water. The water in the creeklets would be separate from the water in the Lagoon and would be recirculated on site. No significant impacts on Laguna Channel flows are expected to occur. See Public Services for additional discussion of drainage issues.

In addition, the MEA indicates that the hotel/park site is in an area of tsunami run up. The City's Seismic Safety/Safety Element indicates that tsunamis are very low frequency events in the Santa Barbara area. Only two tsunamis have occurred in 175 years and only one of those, in 1812, had the potential to cause significant damage. The approach the City has taken is to preserve lives rather than property. Warning and evacuation procedures are outlined in the City of Santa Barbara Natural Disaster Plan and the Disaster Contingency Plan. Periodic simulations are conducted by the City and other agencies involved in responding to such a disaster. No significant impacts are expected to occur.

The projected water use for the park and hotel is 40.03 AFY, 25.72 AFY potable and 14.31 AFY non-potable. The hostel will use 2.76 AFY, less than the historical use of 5.17 AFY, resulting in a net decrease of 2.41 AFY. The total (net) water use for the project will be 37.62 AFY. In addition, the Specific Plan sets a maximum amount of potable water use for the Specific Plan area of 2.4 AFY/Acre which equates to a maximum allowed potable water use for the hotel and park of 30.28 AFY. The proposed potable water use is 25.72 AFY (including a 35% contingency factor based on the applicant's contention that a luxury hotel will use more water than a standard hotel of a similar size), well within the water use allowed by the Specific Plan.

The interim threshold of significance for City water demand is 14,850 AFY (90% of the dependable supply of 16,500 AFY). According to the quarterly report to City Council on water usage in July 1992, the projected water demand for FY 1992/93 is 11,210 AFY. Addition of this project would result in a projected water demand of 11,248 AFY, well within the threshold of significance. No significant impacts on water supply are expected to occur.

Mandatory Findings of Significant Environmental Effect.

		Yes	Maybe	No
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of major periods of California's history or prehistory?	✓		
b.	Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?			✓
c.	Does the project have environmental effects which are individually limited but cumulatively considerable?		✓	

d. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	___	✓	___
Alternatives to the Proposed Action. Does the project require the discussion and evaluation of a range of reasonable alternatives which could feasibly attain the basic objectives of the project?	✓	___	___

Discussion of Findings:

This project does have the potential to degrade the quality of the environment due to the loss of specimen trees and effects on cultural resources, to result in cumulative effects on the environment in terms of air quality, traffic and parking, and to have environmental effects which could cause substantial adverse impacts on human beings including traffic, parking, air quality, noise and visual impacts. The EIR should be focussed on the following issues:

- Air Quality (short and long term)
- Biological Resources
- Cultural Resources
- Geology and Soils (construction vibration)
- Noise and Vibration
- Risk of Upset/Hazardous Materials
- Transportation/Circulation/Parking (short and long term)
- Visual/Aesthetics (short and long term)

Discussion of Alternatives: It will be necessary to discuss a variety of alternatives to the project. These alternatives should, at a minimum, include:

- No Project
- Reduced Sized Hotel and Reduced Programming for the Park
- Land Uses Consistent with the Specific Plan
- Parking for Hotel Off-Site
- Parking for Park Off-Site
- Alternative Uses for Hostel Site
- Alternative Sites for Hotel and Hostel

RECOMMENDATION OF THE ENVIRONMENTAL ANALYST:

On the basis of this initial evaluation:

— I find the proposed project will NOT have a significant adverse environmental effect, and a NEGATIVE DECLARATION should be prepared.

— I find that although the proposed project could have a significant adverse environmental effect, there would not be a significant effect in this case if the project mitigations described herein are implemented. A NEGATIVE DECLARATION should be prepared.

✓ I find that the proposed project MAY have a significant adverse environmental effect, and an ENVIRONMENTAL IMPACT REPORT should be prepared.

— I find that the project MAY have a significant adverse environmental effect and the impact is described in the

Bettie Henson
Signature for Env. Analyst

10-9-92
Date

Janice M. Hubbell
Initial Study Preparer

Attachments:

A. Project Description
B. Proposed Specific Plan Amendments
C. Botanic Survey, Katherine Rindlaub, June 11, 1992
D. Tree Management Plan, Bill Spiewak, undated
E. Summary of Phase 1 Archaeological Study for Fiesta Park Project from EIR
F. Phase 1 Archaeological Study for new parcels for Waterfront Park, Pandora Snethkamp, May 17, 1992
G. Phase 1 Archaeological Study for hostel site, MacFarlane Archaeological Consultants, November 25, 1991
H. Energy Conservation Plan prepared by Applicant
I. Preliminary Geotechnical Design Data, LAW/Crandall, Inc., June 3, 1992
J. Hotel Traffic and Parking Study, ATE, May 28, 1992
K. Park Traffic and Parking Study, Penfield and Smith, May 20, 1992
L. Hostel Traffic and Parking Study, ATE, July 23, 1992
M. Parking Requirements per Zoning Ordinance - Hotel and Park
N. Joint Architectural Board of Review and Landmarks Committee Minutes on the Hotel and Park, March 20, 1991; April 15, 1992; May 15, 1991; August 19, 1991; March 18, 1992
O. Landmarks Committee Minutes on Hostel, July 22, 1992

[jh/park/initial.lst]

PARTIAL LIST OF REFERENCE MATERIALS USED IN PREPARATION OF INITIAL STUDIES

Affordable Housing Procedures Manual

California Environmental Quality Act (CEQA) & CEQA Guidelines

Fiesta Park Environmental Impact Report and Addenda

General Plan Circulation Element

General Plan Conservation Element

1985 Housing Element

1985 General Plan Housing Element Addendum

General Plan Land Use Element

General Plan Noise Element

General Plan Noise Element w/appendices

General Plan Map (cashier)

General Plan Seismic Safety/Safety Element

Geology Assessment for the City of Santa Barbara

Institute of Traffic Engineers Parking Generation

Institute of Traffic Engineers Trip Generation

Local Coastal Plan (Main & Airport)

Master Water Plan

Master Environmental Assessment

Master Environmental Assessment Cultural Resources Section

Master Environmental Assessment Maps

Outer State Street Area Environmental Impact Report

Parking Design Standards

Paseo Nuevo/Downtown Retail Environmental Impact Report

Revitalization Project Environmental Impact Report

Santa Barbara Municipal Code & City Charter

Special District Map

Uniform Building Code as adopted by City

Water Demand Factor & Conservation Study

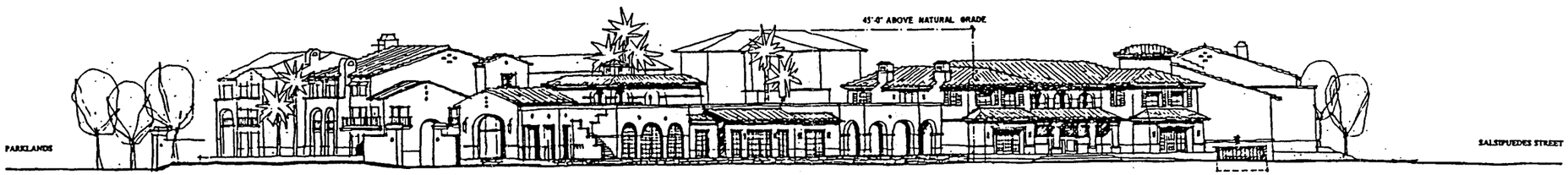
5 Year Water Policy Action Plan Environmental Impact Report

Zoning Ordinance & Zoning Map

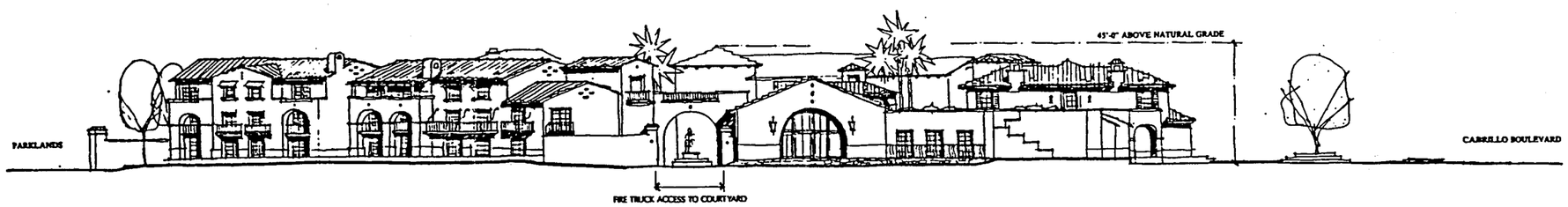
Appendix B

Project Description Information

SALSIPUEDES STREET ELEVATION



CABRILLO BOULEVARD ELEVATION



PARKLANDS ELEVATION

EXTERIOR ELEVATIONS

FEET 1"=20'
0 10 20 40

ARTHUR VALDES & CO.
ARCHITECTURE PLANNING INTERIOR DESIGN

B-4

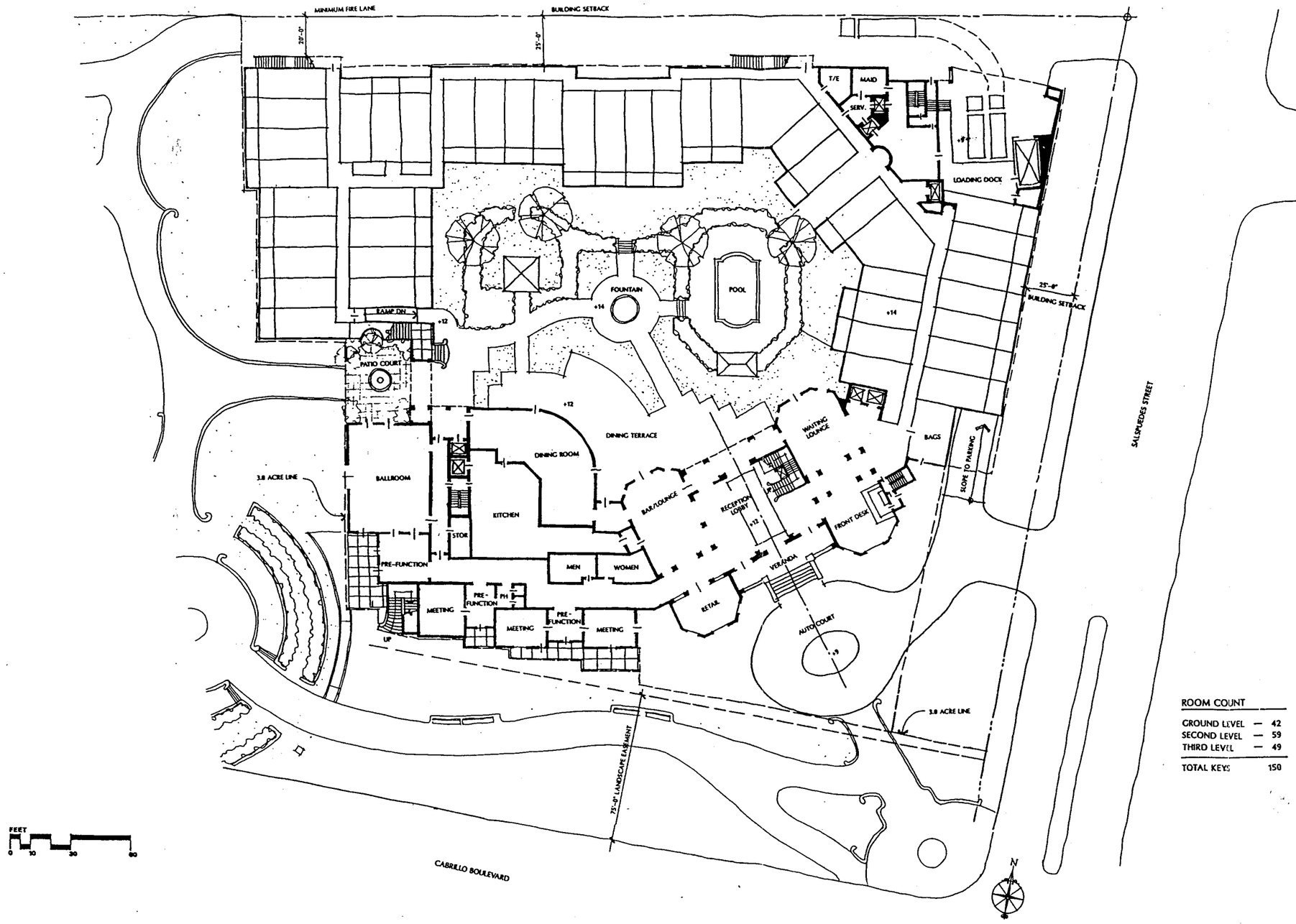
PARK PLAZA HOTEL

325 EAST CABRILLO BOULEVARD
SANTA BARBARA, CALIFORNIA

Wimberly Allison Tong & Goo

PROJECT NO. 91324

MARCH 12, 1992



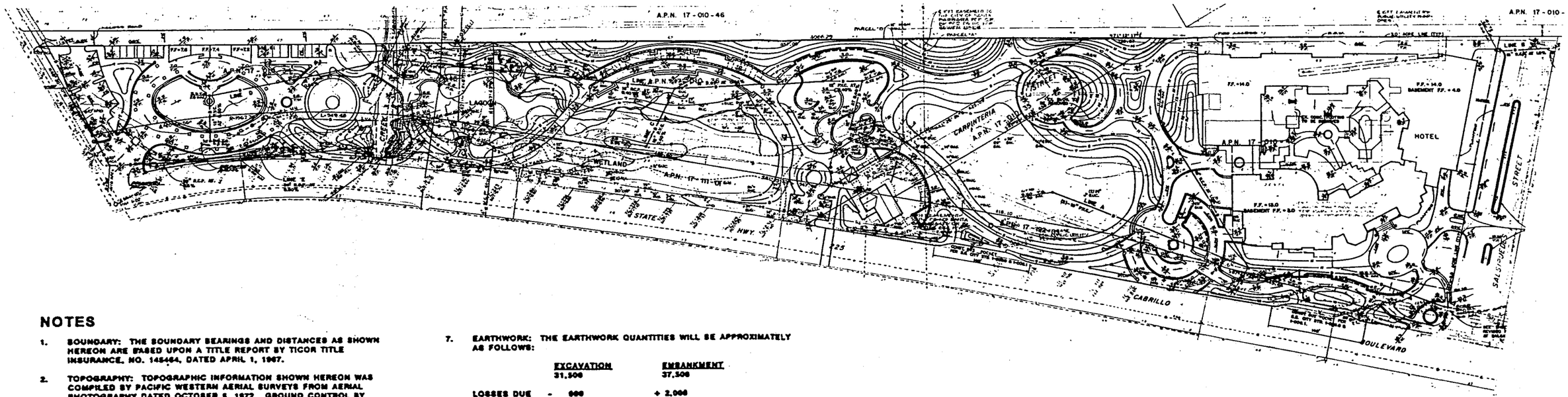
ROOM COUNT

GROUND LEVEL	— 42
SECOND LEVEL	— 59
THIRD LEVEL	— 49
TOTAL KEYS	150

SOURCE: Arthur Valdes & Company, Wimberly Allison Tong & Goo, March 12, 1992

HOTEL GROUND LEVEL FLOOR PLAN

INTERFACE



NOTES

1. BOUNDARY: THE BOUNDARY BEARINGS AND DISTANCES AS SHOWN HEREON ARE BASED UPON A TITLE REPORT BY TICOR TITLE INSURANCE, NO. 145464, DATED APRIL 1, 1967.

2. TOPOGRAPHY: TOPOGRAPHIC INFORMATION SHOWN HEREON WAS COMPILED BY PACIFIC WESTERN AERIAL SURVEYS FROM AERIAL PHOTOGRAPHY DATED OCTOBER 5, 1972. GROUND CONTROL BY PENFIELD & SMITH ENGINEERS, INC. SEPTEMBER 1972.

3. BASIS OF ELEVATION: DISC ON TOP OF BRIDGE RAILING AT MISSION CREEK AND CABRILLO BOULEVARD STAMPED "1930 U.S.C.&G.S. - TIDAL 1" ELEVATION = 13.652 - BASED ON U.S.C.&G.S. - LISTED AUGUST 1961.

4. PUBLIC UTILITIES:

WATER	CITY OF SANTA BARBARA
SEWER	CITY OF SANTA BARBARA
GAS	SOUTHERN CALIFORNIA GAS COMPANY
TELEPHONE	GENERAL TELEPHONE COMPANY
CABLE T.V.	COX CABLE OF SANTA BARBARA

5. UNDERGROUND UTILITIES: UNDERGROUND UTILITIES AND SUBSTRUCTURES AS SHOWN HEREON WERE TAKEN FROM THE BEST AVAILABLE SOURCES AND ARE PRESUMED TO BE ACCURATE AND COMPLETE, BUT SINCE THE INFORMATION WAS OBTAINED FROM OTHERS, PENFIELD & SMITH ENGINEERS, INC. CANNOT GUARANTEE SAID INFORMATION AS BEING COMPLETE AND ACCURATE.

6. EASEMENT: EXISTING EASEMENTS SHOWN HEREON ARE FROM A TITLE REPORT BY TICOR TITLE INSURANCE NO. 180550-DV DATED MAY 1967.

7. EARTHWORK: THE EARTHWORK QUANTITIES WILL BE APPROXIMATELY AS FOLLOWS:

	EXCAVATION	EMBANKMENT
	31,500	37,500
LOSSES DUE TO C & G	- 600	+ 2,000
	30,900	39,500
SHRINKAGE (25%)	- 7,800	
	23,100	39,500

IMPORT BORROW = 16,400 C.Y.

THE ABOVE QUANTITIES REPRESENT THE VOLUMES, EXISTING IN PLACE, COMPUTED FROM EXISTING GROUND SURFACE, AS REPRESENTED BY THE TOPOGRAPHIC MAP, TO PROPOSED GRADE. A LOSS OF GRADE OF 0.15 FEET DUE TO CLEARING AND GRUBBING IS ANTICIPATED. AN ADDITIONAL 25% SHRINKAGE FACTOR HAS BEEN APPLIED TO EXCAVATION. IT APPEARS THAT APPROXIMATELY 3,000 C.Y. OF UNCONSOLIDATED FILL MATERIAL HAS BEEN PLACED ON THE SITE SINCE THE COMPILATION OF THE TOPOGRAPHIC MAP. THEREFORE, THIS MATERIAL WILL BE REMOVED AND RECOMPACTED. THIS QUANTITY IS INCLUDED IN THE ABOVE QUANTITIES.

8. HAUL TRUCKS USED FOR THE MOVING OF DIRT SHALL USE TARPAULINS TO REDUCE DUST GENERATION, OR OTHER MANNER APPROVED BY THE APCD.

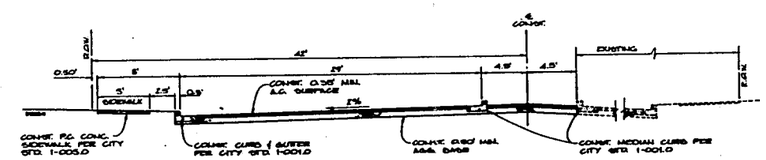
9. GRADING AND IMPROVEMENT CONSTRUCTION ACTIVITIES SHALL BE LIMITED TO DAYLIGHT HOURS.

10. THE APPLICANT SHALL BE RESPONSIBLE FOR PROPER MAINTENANCE AND OPERATION OF CONSTRUCTION EQUIPMENT. CATERPILLAR PRECHAMBER DIESEL ENGINES OR THEIR EQUIVALENT SHALL BE USED TO MITIGATE NOX EMISSIONS DURING THE CONSTRUCTION PERIOD.

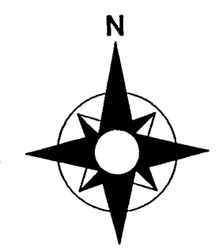
11. CONSTRUCTION TRUCK ACCESS SHALL BE LIMITED TO SALSIPUEDES STREET AND SANTA BARBARA STREET.

12. CONSTRUCTION TRUCK TRIPS SHALL BE SCHEDULED DURING NON-PEAK HOURS TO REDUCE PEAK HOUR CONGESTION PROBLEMS.

13. THE EXISTING OBSERVATION WELLS (WELL NOS. 4N27W-23F2, 4N27W-23F3 AND 4N27W-23F4) LOCATED WITHIN THE LANDSCAPED AREA WILL BE PLACED IN UNDERGROUND VAULTS.



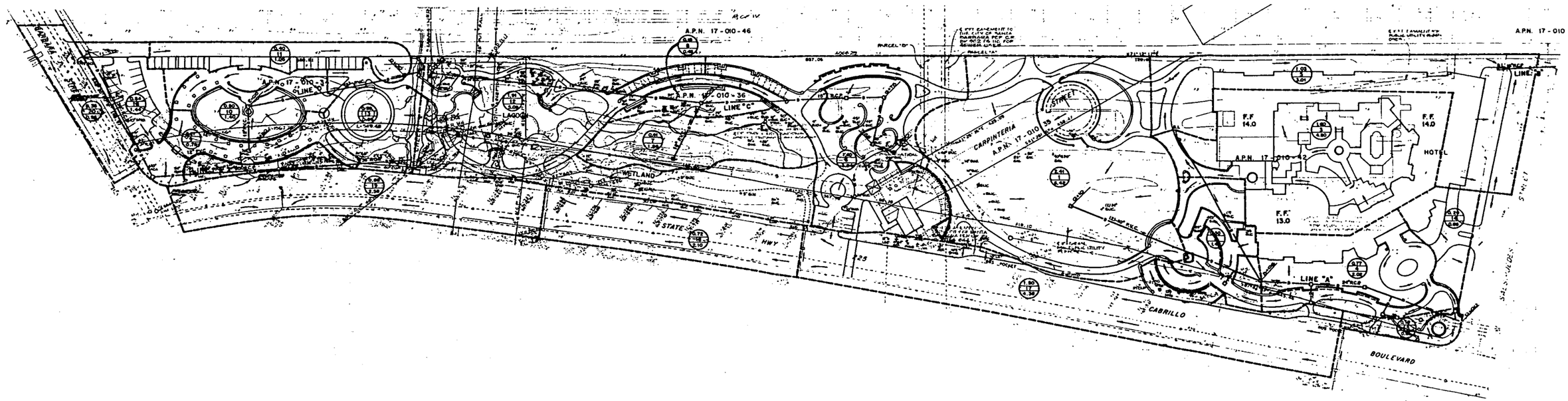
TYPICAL SECTION - SALSIPUEDES STREET



SOURCE: George W. Girvin Associates, Inc., Penfield & Smith Engineers, Wimberly Allison Tong & Goo, 1992

PARK & HOTEL GRADING PLAN

INTERFACE



LEGEND

- DRAINAGE DIVISION LINE
- FLOW DIRECTION
- CATCH BASIN & STORM DRAIN
- F.F. FINISH FLOOR ELEV.
- STORM DRAIN MANHOLE
- STATIONING FOR STORM DRAIN
- DRAINAGE INLET
- 1.50 — DRAINAGE ACREAGE
- 17 — DRAINAGE AREA No.
- 4.38 — 100 YEAR DRAINAGE RUN-OFF (IN C.F.S.)

N

SOURCE: George W. Girvin Associates, Inc., Penfield & Smith Engineers, Wimberly Allison Tong & Goo, 1992

PARK & HOTEL DRAINAGE MAP

INTERFACE

AUTHORITY AND CONDITIONS FOR
SPECIFIC PLAN NO. 1 PARK PLAZA

I. Authority for Specific Plan No. 1

This amended Specific Plan No. 1 is approved in accordance with Sections 65450 through 65452 of the State of California Government Code.

II. Boundary of Specific Plan No. 1

The City Council of the City of Santa Barbara hereby establishes Specific Plan No. 1, applicable to that area described in the attached legal description (Exhibit A), and the area shown on the map (Exhibit B), shown as Parcel A, Parcel B, Parcel C, Salsipuedes Street, Carpinteria Street, Milpas Street, Calle Puerto Vallarta ~~Punta Gorda Street~~ and Cabrillo Boulevard and City owned land between Parcel~~s~~ ~~A, B and C~~ and Cabrillo Boulevard.

III. Intent and Purpose

~~The General Plan and recently adopted Local Coastal Plan have outlined goals and policies that directly affect the development of the property described herein. While current City ordinances assure the development of the property in accordance with the General Plan, they do not assure consistency with the Local Coastal Plan. The necessary ordinances to assure development consistent with the Local Coastal Plan are currently being prepared and have not begun the review and public hearing process.~~

The intent and purpose of Specific Plan No. 1 is to ensure the orderly development of the area described herein, in accordance with the General Plan and Local Coastal Plan of the City of Santa Barbara. The Specific Plan is intended to provide regulatory controls that conform to the General Plan elements, Local Coastal Plan, and mitigation measures that minimize any adverse environmental impacts as outlined in the Final Environmental Impact Report for the Waterfront Park and Hotel project.

IV. Procedures

Any and all future development of the property shall conform to the provisions of Specific Plan No. 1. No further development shall be permitted without the following:

A. Development Plan review and approval by the Planning Commission. Said approval, disapproval, or conditional approval shall follow the same procedures established for

Development Plan Approval and Coastal Development Permits in accordance with Municipal Code Title 28 (the Zoning Ordinance) ~~Resolution #81-043 of the City Council or subsequent procedures adopted pursuant to the Local Coastal Program~~.

B. Architectural Review and approval by the Architectural Board of Review and Landmarks Committee. Said approval, disapproval, or conditional approval shall follow the same procedures established for such approval in the Municipal Code.

V. Development Phasing

Phasing of development is permitted if a phasing plan is reviewed and approved by the Planning Commission as a part of the Development Plan Approval of development for one or more parcels.

VI. Permitted Uses

A. Parcel A (as referenced herein)

1. Recreational/open space and public parking; and/or,

2. Visitor-serving uses in accordance with the Local Coastal Plan "Hotel and Related Commerce I" designation (HRC-I) as follows:

a. Hotel, motel, or lodge

b. Conference center in conjunction with a hotel, motel, or lodge.

c. Restaurant or restaurants in conjunction with a hotel, motel, or lodge.

d. Cocktail lounge or lounges in conjunction with a hotel, motel, or lodge.

e. Stores or shops in conjunction with a hotel, motel, or lodge.

f. Health club in conjunction with a hotel, motel, or lodge.

g. Recreational facilities in conjunction with a hotel, motel, or lodge.

h. Automobile rental in conjunction with a hotel, motel, or lodge.

i.~~.~~ Bicycle rentals in conjunction with a hotel, motel, or lodge.

j.~~.~~ Ancillary uses for the express purpose of hotel, motel, or lodge operations include, but not limited to, the following:

(1) Employee cafeteria
(2) Kitchens
(3) Restrooms
(4) Lobby
(5) Storage and back-of-the-house
(6) Coat/phones
(7) Administrative offices

B. Parcels B and C

1. Primary Use

As indicated in the City's Local Coastal Plan (LCP), the primary land use for Parcels B and C shall be public park and recreational facilities developed in conjunction with public parking in accordance with Chapter 28.37 of the Municipal Code.

2. Secondary Use for Parcel B

Notwithstanding the primary use specified above, if Parcels B is ~~and C are~~ not acquired, dedicated, or otherwise developed for public park and recreational facilities, the following uses shall be considered in compliance with the underlying land use designation described in the City's Local Coastal ~~Program~~ Plan subject to all development regulations adopted pursuant to the authority and conditions herein:

a.~~.~~ Visitor-serving uses in accordance with the Local Coastal Plan designation for "Hotel and Related Commerce II~~,~~." ~~but excluding Hotel and Motel uses.~~

b.~~.~~ Recreation and open space facilities in conjunction with parking.

c.~~.~~ Multiple-family residences developed as part of a mixed use project subject to the following conditions:

~~a.~~(1) Residential use shall be developed consistent with Coastal Act Section 30213 and LCP Policy 5.6.

~~b.~~(2) Residential building coverage shall not encompass more than 40% of the building coverage of visitor-serving uses ~~on Parcels B and C~~.

~~c.~~(3) Development of residential use shall be in compliance with the provisions of LCP Policy 4.6 and the related action.

3. In accordance with the Conditions of Approval set forth in the Coastal Development Permit for the hotel development on Parcel A, approved by the California Coastal Commission (CCC) on October 7, 1981 and proposed for amendment (Attachment X):

a. The total area to be developed on Parcels B and C pursuant to Section VI.B.1 and 2 above, and parking for those allowed uses, shall be limited to 3.0 acres and the remaining acreage shall be preserved and protected for public open recreational use.

b. The developer of Parcel B shall construct a 75 bed hostel within the City's Coastal Zone between Castillo Street on the west and the cemetery on the east in any location acceptable to the Executive Director of CCC. The hostel shall meet the criteria for a superior grade hostel facility equivalent to that established by the American Youth Hostel Association. The hostel shall be dedicated to a public agency or private organization which will own and operate it in perpetuity as hostel. The provision of the hostel under this option shall not displace existing low or moderate income lodging facilities within the City's Coastal Zone and shall be done in a manner consistent with the City's housing policies of its LUP. The hostel shall not be provided above space utilized for entertainment or night activity.

VII. Development Regulations

A.~~1.~~ Deficiency Point System

1~~A~~. Traffic and Circulation

a. Parcel A

During the period that the City of Santa Barbara utilizes the 100 point "deficiency points" system (Policy 11.2 and 12.1 of the adopted Local Coastal Plan) as one of the criteria in the evaluation of proposed developments within the Waterfront Area,

the City shall not permit development within Parcel A of Specific Plan 1~~I~~ that will generate traffic that exceeds a cumulative total of 20 deficiency points or 360 p.m. peak hour trips (in plus out) as determined by the Department of Public Works.

b. Parcel B and C

In accordance with the policies for the City's Coastal Zone, the development of Parcels B and C is not a priority use for which deficiency points have been reserved. Development of Parcels B and C shall be evaluated for deficiency points in the same manner as all other projects in the Waterfront Area consistent with LCP Policies 11.2, 12.1, and Coastal Act Section 30254. The cumulative total of the development of Parcels A, B and C shall not exceed 30 deficiency points or 552 p.m. peak hour trips as determined by the Department of Public Works with the exception of the peak hour trips associated with the portion of land not included in the original Specific Plan. Trips associated with the additional land (see shaded portion of Exhibit B) included in this amended Specific Plan shall be permitted in accordance with the LCP and Municipal Code Section 28.87.300.

c. Monitoring

Automatic traffic counters shall be installed at the entrances and exits of each parcel which can be monitored for purposes of assuring compliance with "a" and "b" above. If, upon inspection by the City, ~~of~~ violations of these conditions are found, development permits approved pursuant to the authority and conditions of this plan shall be reviewed by the Planning Commission for additional controls and conditions to reduce traffic generated by such developments.

2. Parking

a. Developer ~~Development~~ shall provide parking in accordance with the minimum City ordinance requirements. However, parking needs for individual development may be evaluated on a site-/use-specific basis. Parking shall be provided to meet peak parking needs as justified through written evaluation by the applicant and reviewed by the Transportation ~~Committee~~ and Parking Manager and/or Planning Commission. New development may, based upon site-/use-specific considerations, be

required to provide parking in excess of the minimum ordinance requirements. In the case that parking needs are determined to be less than minimum ordinance requirements, the Planning Commission may approve a Modification Application.

b. The developer shall waive the right to protest the formation of a Waterfront Area parking district.

c. All legal on-street parking removed as a result of any project shall be replaced on site, or off-site in close proximity as approved by the Planning Commission, on a one-for-one basis. The number of parking spaces to be replaced shall be determined by the ~~Department of Public Works~~ Transportation and Parking Manager. Said spaces shall be in addition to the minimum required in accordance with (2.a), above.

3. Alternative Transportation Incentives

a. Parcels A and B

(1) Any hotel/motel use shall meet the following requirements:

(a) ~~(1)~~ The developer, upon application for hotel/motel uses, shall submit to the Planning Commission for review and approval, a visitor information program. The program shall include, but not be limited to, the following:

(i) ~~(a)~~ A means of providing train, bus, airline schedules and maps to prospective hotel guests.

(ii) ~~(b)~~ A means of providing hotel guests with alternative transportation modes, schedules, and maps of access to the Central Business District, beach area, and other local and regional points of interest.

(iii) ~~(c)~~ Advertisement for and to solicit conferences which includes the City's clean air and energy goals and explanation of the benefits of using alternative transportation modes.

(iv) ~~(d)~~ A means of coordinating special events with the City (i.e., Fiesta) so that appropriate traffic controls, rerouting, and timing of events can be achieved.

(b) ~~(2)~~ A shuttle service to the Airport, train depot, bus depot, and other hotels shall be provided.

(c) Bike rentals shall be provided for hotel guests.

(~~3~~2) Bicycle parking shall be provided as follows:

(a) One (1) bicycle parking space for every seven (7) automobile spaces shall be provided.

(b) ~~In addition,~~ Lockable employee bicycle parking spaces shall be provided within an enclosed, covered area. All bicycle rack areas shall be located in an area within direct view of security personnel.

(c) One (1) enclosed and lockable storage space of a size able to accommodate at least two (2) bicycles shall be provided for each residential unit.

(~~4~~3) Shower and locker facilities shall be provided for use by all employees.

~~(5) Bike rentals shall be provided for hotel guests.~~

(~~6~~4) Carpool spaces shall be provided for employees: At least 10% of the employee parking spaces.

(~~7~~5) Employees shall be made aware of the Ride Sharing program administered by the Area Planning Council.

(~~8~~6) Maps showing bicycle route and bus route/schedule information shall be posted in a least two (2) locations.

(~~9~~7) Free bus passes shall be made available to all employees.

b. Parcel ~~B and~~ C

(1) One (1) bicycle parking space for every seven (7) automobile spaces shall be provided.

(2) Maps showing bicycle route and bus route/schedule information shall be posted in a least two (2) locations.

(3) Shower, locker and enclosed lockable bike parking facilities shall be provided for use by ~~all~~ employees of any use employing twenty (20) or more persons.

~~(4) One (1) enclosed and lockable storage space of a size able to accommodate at least two (2) bicycles shall be provided for each residential unit.~~

4. Public Improvements

a. The developer shall widen adjacent streets as necessary to accommodate estimated future traffic volumes, non-project plus project. The calculations to support the proposed street widening, if any, shall be approved by the City Transportation Engineer.

b. Adequate storage lengths for right-turn or left-turn movements shall be provided on streets adjacent to the project, including, but not limited to:

* (1) Eastbound left-turn on Cabrillo Boulevard at Calle Puerto Vallarta ~~Punta Gorda Street~~.

* (2) Westbound right-turn on Cabrillo Boulevard at Calle Puerto Vallarta ~~Punta Gorda Street~~.

* (3) Southbound on Calle Puerto Vallarta ~~Punta Gorda Street~~ at Cabrillo Boulevard.

* (4) Northbound left-turn on Calle Puerto Vallarta ~~Punta Gorda Street~~ at Milpas Street.

* (5) Southbound right-turn on Milpas Street at Calle Puerto Vallarta ~~Punta Gorda Street~~.

* (6) Northbound left-turn on Calle Puerto Vallarta ~~Punta Gorda Street~~ at project driveways.

* (7) Signalized pedestrian crossing shall be provided at Salsipuedes Street/Cabrillo Boulevard and Punta Gorda Street/Cabrillo Boulevard.

(8) Northbound left-turn on Salsipuedes Street at project driveway(s).

The adequacy of such turning lanes shall be substantiated to the satisfaction of the City Transportation Engineer.

* c. The developer shall install or contribute to full-actuated traffic signals at the following intersections. In addition, ~~that~~ said signals shall be bicycle actuated and interconnected with existing signal systems. Signals shall be in full operation prior to occupancy clearance.

Intersection	Contribution	Timing
Calle Puerto Vallarta ~~Punta Gorda Street~~ at Milpas Street	100%	Concurrently with construction of hotel/conference center.
Calle Puerto Vallarta ~~Punta Gorda Street~~ at Cabrillo Boulevard	100%	" "
Salsipuedes Street at Cabrillo Boulevard	100%	" "
Milpas Street at southbound U.S. 101 on-ramp	25%	Concurrently with construction of hotel/conference center.

* Improvements required for Parcel A and have been completed.

d. The developer shall offer for dedication and improve Salsipuedes Street within the Specific Plan Area and shall improve the extension of Salsipuedes Street across City owned lands to an intersection with Cabrillo Boulevard. Salsipuedes Street shall have a right of way width of eighty-four (84') feet and be improved with a paved width of sixty-seven (67') feet with curbs, gutters, sidewalks, street trees, street lights, street name signs and stop signs in conformance with the Standards of the City for the construction of public streets. The developer shall also install traffic lights at the intersection of Salsipuedes Street and Cabrillo Boulevard when

directed by the City. Said dedication shall be accomplished by the Final Map creating Parcels A, B and C. The easterly half of said improvements shall be required as a condition of approval of the site plan for the development of Parcel A and the westerly half of said improvements shall be required as a condition of approval of the site plan for the development of Parcel B.

e. The following alternative transportation measures shall be instituted as a minimum:

(1) Bus pockets, shelters, and bike parking facilities, shall be provided as determined appropriate by the developer, in concurrence with the City Transportation Engineer and the Metropolitan Transit District.

(2) Use of bicycles shall be encouraged by:

(a) Constructing shower and locker facilities for use by employees of any use employing (20) or more persons.

(b) Linking any on-site bikeways with adjacent City bikeways. This should include linking to bike lanes on adjacent streets where appropriate.

(c) Constructing bicycle storage facilities as required by City ordinance.

B. Visual and Aesthetics

1. Building Setbacks

a. Cabrillo Boulevard

(1) Parcel A

(a) 120-feet measured from the existing curb line for one story buildings and parking facilities.

(b) 180-feet measured from the existing curb line for two (2) story buildings.

(c) Plazas and recreational facilities for public use ~~may encroach up to~~ must be set back at least 50 feet measured from the existing curb line.

(2) Parcels B and C

(a) 75-feet minimum measured from the existing curb line. ~~Parking areas or driveways shall not encroach into the setback area.~~

(b) Plazas, parking, driveways, and structures for recreational facilities (i.e., storage buildings, kiosks, restrooms and carousel) for public use must be set back at least 10 feet measured from the existing curb line.

b. ~~Salsipuedes Street/~~Calle Puerto Vallarta ~~Punta Gorda Street~~/Milpas Street

(1) 40-feet measured from the property line for one story buildings and parking structures and 75-feet measured from the property line for two story buildings and parking structures.

(2) Surface and underground parking, plaza and recreation areas must be set back at least ~~may encroach into the setback up to 25 feet from the property line along Salsipuedes Street, and up to~~ 10 feet from ~~for~~ Calle Puerto Vallarta ~~Punta Gorda Street~~ and Milpas Street.

c. Salsipuedes Street

(1) 33.5-feet measured from the new curb line pursuant to Section VII.A.4.d.above.

d. Santa Barbara Street

(1) As required by Chapter 28.22 of the Municipal Code.

2. Landscaping

a. All setback areas as specified ~~in (1.a. and b.)~~ above shall be landscaped.

b. Parking lots shall be landscaped in accordance with the City's Parking Ordinance and completely screened from all streets.

c. Landscaping along Cabrillo Boulevard shall be compatible with that of Chase Palm Park. Existing mature and healthy trees shall be saved and included in the landscaping design, or as provided within the development plan approval.

d. Dense, fast-growing species of trees and shrubs shall be provided along the railroad right-of-way as allowed by the Public Utilities Commission.

e. All plant material shall be a drought tolerant species.

f. All loading docks, trash areas, and service areas shall be screened with structural enclosures and dense landscaping.

3. Building Height

a. Two (2) stories, not to exceed thirty (30) feet; or

b. Provide a height-setback relation study for the purpose of maximizing view protection/enhancement and creation of contiguous open space areas. If utilizing this method to determine building height, in no case shall any buildings exceed three (3) stories and 45 feet. Determination to allow height-setbacks shall be by the Planning Commission through advisement by the Architectural Board of Review and Landmarks Committee.

4. Architectural Design

a. The development of Parcels A, B and C shall be subject to review by the Architectural Board of Review and Landmarks Committee to ensure that the architectural design, scale, and character are reflective of the character of the El Pueblo Viejo District.

5. View Corridors/Distance Between Buildings

a. Prior to the development of Parcels A, B and C, a view corridor study shall be provided to determine the necessary distances between buildings. Views shall be assessed from Cabrillo Boulevard toward the foothills and mountains. The Architectural Board of Review and Landmarks Committee shall advise the Planning Commission on the determination of view corridors. In no case shall building separations be less than permitted in the basic zone established for the property.

b. All buildings shall be oriented to preserve and enhance the determined view corridors.

6. Signs

a. All signs shall be subject to review and approval, disapproval, or conditional approval by the Sign ~~Sub~~ Committee in accordance with section 22.70 of the Municipal Code.

b. Signs shall be minimal, clear and unobtrusive and be complementary to other signs within the Specific Plan area.

~~c. Pole signs as defined in the City's Zoning Ordinance shall not be permitted.~~

~~d. A complete sign program shall be established and approved by the Sign Sub Committee for the future development of Parcels A, B and C.~~

7. Other Regulations

a. All utilities shall be placed underground.

b. All exterior lighting shall be of low intensity and within the "white" light color spectrum, except as ~~that~~ necessary for recreational activities.

c. Lighting standards shall be designed in harmony with the coastal orientation of the site and architectural design of the building.

d. Lighting standards shall not exceed 12 feet in height, excepting public street lights along the street right-of-way or as ~~that~~ necessary for recreational activities.

C. Recreation and Open Space

1. Parcel A

A condition of development of a hotel/conference center of Parcel A shall include dedication and the improvement of a park site. The amount of area shall be 4 acres per 1000 persons based upon two (2) persons per guest room.

2. Parcels B and C

Additional dedication and improvement of park land may be required. The amount will be predicated upon the generated recreation demand by the particular project.

In order to develop Parcel B for commercial purposes, Parcel C shall be developed concurrently with recreation

and open space uses, subject to approval by the Planning Commission and the Parks and Recreation Commission.

~~3. Signalized pedestrian crossing shall be provided at Salsipuedes Street/Cabrillo Boulevard and Punta Gorda Street/Cabrillo Boulevard.~~

D. Geology and Drainage

1. Geology

Prior to the issuance of building permits, the applicant shall submit a ~~revised~~ geotechnical report. This report should relate specifically to the submitted plan and address at a minimum:

a. The recommended design earthquake magnitude, the engineering characteristics of this earthquake (i.e., maximum ground acceleration, duration of strong shaking, etc.) including the effects of site conditions, and ~~its~~ likelihood of occurrence. Site effects may include changes in near surface conditions that will occur as a result ~~part~~ of grading.

b. Measures to be implemented to reduce the potential for liquefaction beneath the proposed structures to a level that is consistent with hazard reduction policies of the City.

c. Measures to be implemented to reduce settlement to amounts that can be accommodated by the proposed site improvements (i.e., structures, drainage devices, etc.).

This report shall be reviewed by an independent qualified Engineering Geologist and a Soils Engineer retained by the City to ensure that the measures proposed meet the intent of City policies regarding hazard reduction. The design earthquake characteristics as developed in this report shall be taken into account by the structural engineer in the design of the proposed site improvements.

2. Drainage

Public Works Department approval must be obtained for a drainage plan to provide adequate storm drainage for a 100 year storm for all ~~three~~ parcels, considering each parcel as fully developed. Adequate positive drainage for this site shall mean a positive underground storm drain system meeting the criteria of the Interim Design and Improvement Standards of the City as well as that no

major sheet flow from the site shall significantly impede two lanes of traffic along Cabrillo Boulevard.

As each parcel develops, the portion of the underground drainage for that parcel must be constructed prior to issuance of a building permit to assure that there will be "no flooding" as described above during site construction with the site drainage for the parcel to be completed prior to issuance of the Certificate of Occupancy.

Since Calle Puerto Vallarta ~~Punta Gorda Street~~ is to be reconstructed with an increase in ~~the~~ elevation, positive drainage must be provided from the park on the south side.

E. Housing

1. Any proposed residential development of Parcel B or C shall be in conformance with the Housing Policies of the City~~'s Coastal Plan and Section 30213 of the Coastal Act of 1976~~.

2. Development proposals for Parcels A, B or C shall satisfy the City's requirement to mitigate any impact the project may have on the City's housing stock through the creation of new affordable housing as required by Chapter 28.87.300 of the Municipal Code ~~be accompanied by an analysis of short-term and long-term impacts upon the City's housing stock as discussed in the Final E.I.R. The study, at a minimum, shall develop strategies and programs to minimize any potential adverse impacts~~.

F. Public Service

1. Water Conservation

a. Development of Parcels A, B and C shall be limited to a maximum water consumption of public potable water of two and four-tenths (2.4) acre feet per year per acre. Data shall be provided by the developer to ensure compliance with this provision and based on water consumption standards approved by the Department of Public Works.

b. Water conservation fixtures shall be provided as follows, but not limited to:

(1) ~~vacuum toilets~~ 1.5 gallon per flush toilets and urinals

~~urinals-low flush~~

(2)~~-~~ ~~flow restricted~~ One-half gallon per minute (0.5 gpm) flow faucets ~~and~~

(3) Two gallon per minute (2.0 gpm) flow shower heads

(4)~~-~~ ~~food mulchers in~~ state-of-the-art water-conserving dishwashers

~~- automatic flow reduction of hot water in showers~~

(5)~~-~~ recycling of laundry water

c. Landscaping shall be drought tolerant vegetation. Irrigation systems for landscaping shall be designed for ~~retrofitting for future~~ use of reclaimed water, except in areas where salt leaching and other technical problems preclude use of reclaimed water.

d. Water sprinklers shall be shut off between 8~~9~~:00 a.m. and 6~~5~~:00 p.m. in summer season.

2. Fire, Security, and Safety Protection

a. A complete disaster evacuation and safety plan shall be reviewed and approved by the Fire Chief. Said plan shall include, but not be limited to, the following:

(1) Smoke detectors in all commercial areas, units, guest rooms and work spaces.

(2) Fire alarm system that is tested and reliable during all adverse circumstances.

(3) Sprinkler systems where determined to be necessary.

(4) Posted safety procedures and evacuation routes throughout.

(5) An evacuation and safety plan to include flood, fire, earthquake, hazardous materials, and tsunami disaster warning.

b. Adequate fire flow pressure as required by the Fire Chief shall be provided.

c. Building materials shall be fire resistant and designed to minimize fire hazards due to earthquakes or other natural disasters.

d. Security systems shall be provided, and such plans shall be approved by the Police Chief.

G. Noise Protection

1. Where feasible, useable yard areas, courtyards, open spaces, and recreational areas shall be separated from the noise sources by buildings or noise barriers so that those areas are not exposed to noise levels greater than 60 db(A).

2. Building construction methods shall be utilized in the building design to attain interior noise levels no greater than 45 db(A). Such design features may include, but are not limited to:

   a. Deep recessed windows with double strength tempered glass.

   b. Walls that face the noise source constructed of solid masonry or other comparable materials with few or no openings for doors or windows.

   c. Where doors and windows are provided, adequate caulking, double glazing and heavy grade weather striping shall be provided.

   d. Solid sealing of wall/roof surfaces.

   e. Insulation.

H. Energy Conservation

Prior to the submittal of plans for development plan approval for Parcels A, B or C, the applicant shall submit a detailed energy conservation plan(s) which shall include, but not be limited to the following:

1. Electrical and Lighting

   a. Minimize use of unnecessary lighting with use of timers and automatic shut off switches.

   b. Establish lighting needs and priorities for different periods of the day and night.

   c. Develop a plan to minimize peak power demand.

   d. Use of alternative lighting types with the most effective energy savings.

e. Maximize use of natural lighting.

f. Survey effective passive cooling and ventilation features including structure design to take advantage of sun shading and wind induced cross ventilation, such as:

(1) Air scoops to collect prevailing winds.

(2) Proper location of vegetation.

(3) Roof overhangs.

(4) Sunshades to increase wind pressure near inlets.

(5) Insulate and ventilate attic space.

(6) Use gravity ventilation to create natural ventilation.

g. Insulation of walls, floors and ceilings.

2. Natural Gas

a. Provide adequate solar design, where feasible, including:

(1) Insulation of walls, floors and ceilings.

(2) Use of building materials that store daytime heat.

(3) Controlled penetration of sun through south facing windows (i.e., awnings, special blinds, double glazed windows, overhangs).

(4) Provide solar water heaters.

The final plans for energy conservation shall be reviewed and approved by the City~~'s Energy Conservation Committee~~ prior to the release of building permits. Their report and analysis shall be forwarded to the Land Use Controls Division for incorporation into the project as built.

VIII. Administration Of Specific Plan No. 1

A. All references herein to ordinances are to ordinances as currently written unless expressly provided to the contrary. To the extent legally permitted, in the event of any conflict between the Specific Plan and the General Plan, ordinances or other policies of the City of Santa Barbara, the Specific Plan shall prevail. In the event any condition or term

herein set forth is declared illegal or unenforceable, the other terms and conditions shall remain in full force and effect to the full extent permitted by law.

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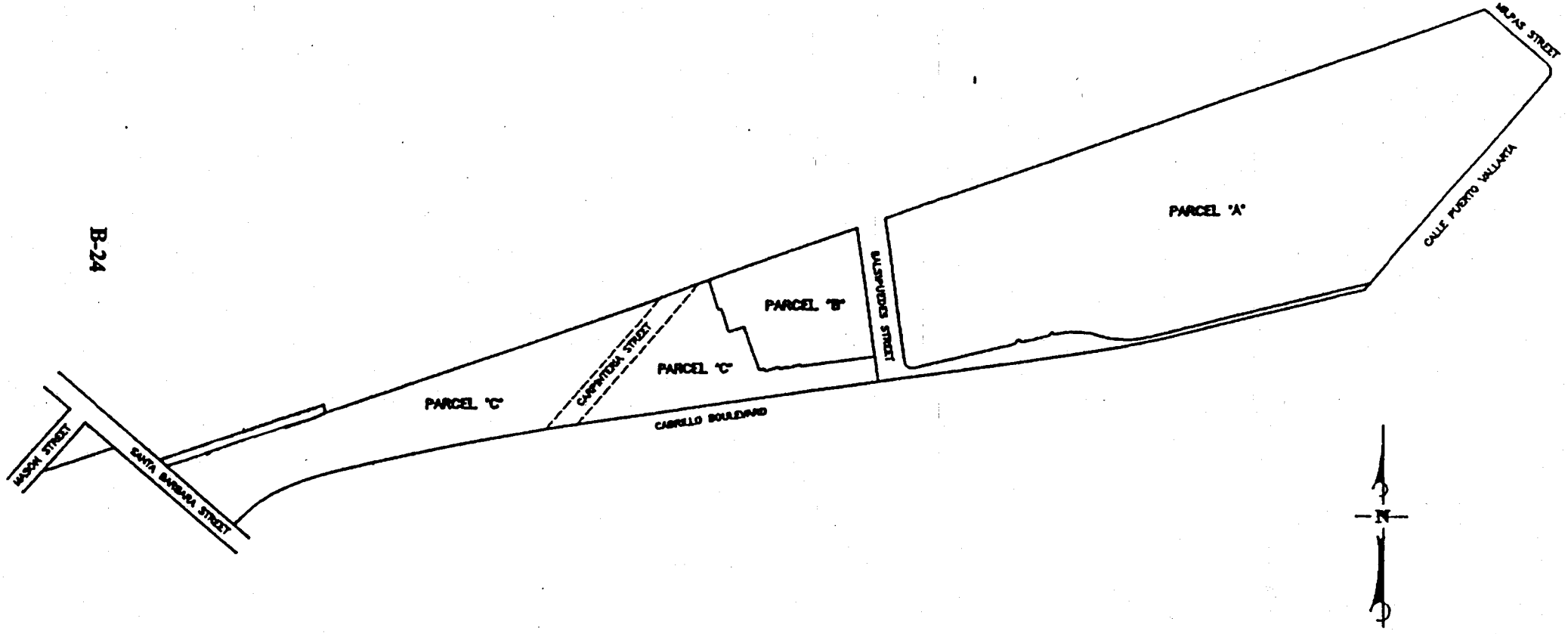

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Appendix C

Traffic/Circulation and Parking Information

LEVEL OF SERVICE CONCEPT

Signalized Intersection

Level of Service (LOS) is the primary indicator for traffic operation performance at intersections. The volume-capacity ratio (v/c) is determined by the volume of conflicting traffic movements per hour and the capacity designed to accommodate them. This ratio, in turn, is rated from LOS "A" to "F." The range describes increasing traffic demand, delays, and deterioration of services.

LOS "A" represents free-flow conditions with little or no delay (zero to five seconds) at intersections. On the contrary, LOS "E" characterizes extremely unstable flow conditions with volumes at or near the designed capacity. Vehicles are likely to experience major delays (40 to 60 seconds) crossing an intersection. Minor incidents may lead to forced flow conditions (LOS "F") with operating volume substantially below capacity. This results in long queues backing up from all approaches to intersections.

LOS ratings from signalized and unsignalized intersections are determined based on different criteria and hence are not directly comparable.

Two-Way Stop-Sign Controlled Intersection

Level of service to individual turning movements on all approaches are determined by a number of factors. These include merging and opposing volumes, arrival frequency on the minor approach, approach speeds, critical gap, sign control, design capacity and intersection geometry.

The resulting LOS reflects delays experienced by that minor street traffic. Thus, while the overall operating condition of the intersection is stable (LOS "C"), certain turning movements to/from the side street could experience delays equivalent to LOS "E" or "F."

Four-Way Stop-Sign Controlled Intersection

Vehicle delay is not related to critical gap since stopping is required on all approaches. Instead, interaction of vehicles is complex and depends on the arrival distribution on different approaches, departure headways, design capacity and intersection geometry.

The resulting LOS reflects similar overall delays described for signalized locations. However, if volumes are substantially "unbalanced" between the intersection legs, vehicles on the highest volume approach would experience disproportionate delays.

LEVEL OF SERVICE DEFINITIONS

LEVEL OF SERVICE	SIGNALIZED INTERSECTIONS	UNSIGNALIZED INTERSECTIONS
"A"	Uncongested operations, all queues clear in a single-signal cycle. (Average stopped delay less than 5 seconds per vehicle.)	Little or no delay.
"B"	Uncongested operations, all queues clear in a single cycle. (Average delay of 5-15 seconds.)	Short traffic delays.
"C"	Light congestion, occasional backups on critical approaches. (Average delay of 15-25 seconds.)	Average traffic delay.
"D"	Significant congestion of critical approaches but intersection functional. Cars required to wait through more than one cycle during short peaks. No long queues formed. (Average delay of 25-40 seconds.)	Long traffic delays.
"E"	Severe congestion with some long standing queues on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements. Traffic queue may block nearby intersection(s) upstream of critical approach(es). (Average delay of 40-60 seconds.)	Very long traffic delays, failure, extreme congestion.
"F"	Total breakdown, stop-and-go operation. (Average delay in excess of 60 seconds.)	Intersection blocked by external causes.

CUMULATIVE PROJECT LIST

WATERFRONT PARK/HOTEL/HOSTEL

Address	# of D.U.s	Non-Res. s.f.	Non-Res. Use(s)	Project Status*
Downtown				
512 Bath	6			A
520 Castillo		2,896	athletic club addition	P
328 Chapala	4	7,951	retail/office	A
211 W. Gutierrez	17		affordable live/work	P
401 E. Haley		2,560	restaurant/deli	P
601 E. Haley		15,932	office/industrial	A
614-618 E. Haley		1,561	restaurant	P
136 N. Quarantina		7,600	industrial	P
627-629 N. Salsipuedes		750	office	P
410 State		1,000	retail	A
521 State		1,000	retail	P
610 State	4	10,335	retail/office/restaurant	P
628 State	7	6,480	retail/office	A
Waterfront Area				
101 E. Cabrillo		1,000	restaurant	A
238 E. Cabrillo		1,849	public restrooms	A
325 E. Cabrillo			150 room hotel & 10 acre park	P
633 E. Cabrillo		0	conference facility	P
232 W. Cabrillo			11 new hotel rooms	A
28 W. Cabrillo			11 new hotel rooms	P
820 Cacique		37,665	post office	A
819 Cacique		5,626	fire station	A
Harbor Way			Harbor Master Plan	P
129 Harbor Way		357	retail	BP
115 Kimberly		2,300	retail	P
201 S. Milpas		3,000	retail/office	A
226 S. Milpas		684	batting cages	P
12 E. Montecito	6	24,440	retail/restaurant	P
500 Ninos		3,854	Zoo animal barn/ concession	A
500 Ninos		5,800	Zoo retail/education/ kitchen	P
34 Nopalitos		2,043	industrial	P
132 Nopalitos		1,400	truck wash	P
29 State		3,000	retail	A
214 State		-4,300	change of use/retail/ restaurant	A
TOTAL	45	109,118+		

*A = Approved
P = Pending
BP = Building Permit

[jh/park/cum-proj.lst]

omni·means
ENGINEERS PLANNERS

6-22-93

Ms. Teesee Murray
Interface
826 De la Vina Street, Suite 210
Santa Barbara, CA 93101

RE: Daily Vehicle Trip Generation for the Proposed Santa Barbara Waterfront Project

Dear Teesee:

After reviewing the DEIR for the proposed Santa Barbara Waterfront Park, Hotel and Youth Hostel Project, the project's daily vehicle trip generation can be summarized in Table 1 as follows:

Table 1
Project Daily Trip Generation

Project Component	Daily Weekday Rate	Daily Weekday Trips	Daily Weekend Rate	Daily Weekend Trips
1. Hotel(per room)= 150 Rooms	8.64	1,296	10.50	1,575
Less Existing Trips	(10 times PM peak hour rate)	-200	(10 times PM peak hour rate)	-120
		1,096		1,455
2. Park[1](per acre)= 10 Acres	38.20	382	121.50	1,215
3. Hostel(per guest)= 75 Guests	1.33	100	1.33	100
		======		======
Net Daily Trip Generation		1,578		2,770

1 Net daily trip generation for the park component of the project was divided between the Carousel portion and the remaining Plaza, Pump House, and Pavilion/Meadow portions. As stated in the DEIR, the Carousel would generate 222 weekday daily trips and 595 weekend daily trips. Due to the specialized nature of the other components, there was no daily trip research available for calculation purposes. However, the DEIR does state that the Plaza, Pump House, and Pavilion/Meadow would generate 16 weekday *peak hour* trips and 62 weekend *peak hour* trips. The peak hour rate is usually 8-12 percent of the daily rate. Using 10 percent as an average, the remaining three park components would generate 160 daily trips and 620 weekend daily trips. When added back into the Carousel portion of the Park they would generate a total of 382 weekday daily trips and 1,215 weekend daily trips.

WALNUT CREEK
2500 Camino Diablo, Ste 220
Walnut Creek, CA 94596

SACRAMENTO
2240 Douglas Boulevard, Ste 250
Roseville, CA 95661

RENO
Lakeside Drive, Ste. 100
Reno, Nevada 89511

As shown in Table 1, the proposed project would generate 1,778 weekday daily trips and 2,890 weekend daily trips. Unless otherwise stated, all trip generation calculations have been based on information found on pages 79-82 of the Santa Barbara Waterfront Park, Hotel and Youth Hostel Project DEIR.

Please contact me should you any further comments or questions regarding daily vehicle trip generation for the proposed project.

Sincerely,

Peter J. Galloway

Peter J. Galloway
Transportation Planner

Appendix D

Air Quality Information

Table II-4. Ambient Air Quality Standards

		CALIFORNIA STANDARDS(1)		NATIONAL STANDARDS(2)		
POLLUTANT	AVERAGING TIME	CONCENTRATION(3)	METHOD(4)	PRIMARY(3,5)	SECONDARY(3,6)	METHOD(7)
Ozone	1 Hour	0.09 ppm (180 ug/m3)	Ultraviolet Photometry	0.12 ppm (235 ug/m3)	Same as Primary Standard	Ethylene Chemiluminescence
Carbon Monoxide	8 Hour	9.0 ppm (10 mg/m3)	Non-Dispersive Infrared Spectroscopy (NDIR)	9 ppm (10 mg/m3)	Same as Primary Standard	Non-Dispersive Infrared Spectroscopy (NDIR)
	1 Hour	20 ppm (23 mg/m3)		35 ppm (40 mg/m3)		
Nitrogen Dioxide	Annual Average	-	Gas Phase Chemiluminescence	0.053 ppm (100 ug/m3)	Same as Primary Standard	Gas Phase Chemiluminescence
	1 Hour	0.25 ppm (470 ug/m3)		-		
Sulfur Dioxide	Annual Average	-	Ultraviolet Fluorescence	80 ug/m3 (0.03 ppm)	1300 ug/m3 (0.5 ppm)	Paraosanoline
	24 Hour	0.05 ppm (9) (131 ug/m3)		365 ug/m3 (0.14 ppm)		
	3 Hour	-				
	1 Hour	0.25 ppm (655 ug/m3)				
Suspended Particulate Matter (PM10)	Annual Geometric Mean	30 ug/m3	Size Selective Inlet Hi-Volume Sampler and Gravimetric Analysis			
	24 Hour	50 ug/m3		150 ug/m3	Same as Primary Standards	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean			50 ug/m3		
Sulfates	24 Hour	25 ug/m3	Turbidimetric Barium Sulfate	-	-	-
Lead	30 Day Average	1.5 ug/m3	Atomic Absorption	-	-	-
	Calendar Quarter	-		1.5 ug/m3	Same as Primary Standard	Atomic Absorption
Hydrogen Sulfide	1 Hour	0.03 ppm (42 ug/m3)	Cadmium Hydroxide Stractan	-	-	-
Vinyl Chloride (Chloroethelene)	24 Hour	0.010 ppm (26 ug/m3)	Tedlar Bag Collection, Gas Chromotography	-	-	-
Visibility Reducing Particles	1 Observation	In Sufficient Amount to Reduce The Prevailing Visibility to Less Than 10 Miles When the Relative Humidity is Less Than 70% (8).		-	-	-
APPLICABLE ONLY IN THE LAKE TAHOE AIR BASIN:						
Carbon Monoxide	8 Hour	6 ppm (7 mg/m3)	NDIR	-	-	-
Visibility Reducing Particles	1 Observation	In Sufficient Amount to Reduce The Prevailing Visibility to Less Than 10 Miles When the Relative Humidity is Less Than 70% (8).		-	-	-

Table II-3. Ambient Air Quality Standards and Highest Levels Recorded in Santa Barbara County

Highest Locally Recorded Level	Ambient Air Quality Standards: FEDERAL EPA	Ambient Air Quality Standards: STATE ARB
NITROGEN DIOXIDE Santa Barbara (State St.) October 1974 .24 ppm Hourly Average	Primary - Annual Average = .05 ppm Secondary - Same as Above	1-Hr Average = .25 ppm
CARBON MONOXIDE Santa Barbara (State St.) 29 ppm Hourly Average January 1974 18 ppm 8-Hour Average December 1978	Primary - 8-Hour Average = 9 ppm 1-Hour Average = 35ppm Secondary - Same as Above	8-Hr Average = 9 ppm 1-Hr Average = 20 ppm
SULFUR DIOXIDE Santa Maria (Glacier Lane) August & September 1986 .19 ppm Hourly Average	Primary - Annual Average = .03 ppm 24 Hr. Average = .14 ppm Secondary - 3-Hr. Avg. = .50 ppm	24 - Hr Average = .05 ppm 1 - Hr Average = .25 ppm
OZONE Santa Barbara (Cath. Oaks) September 1975 .25 ppm Hourly Average	Primary -1-Hour Average =.12 ppm Secondary - Same as Above	1 - Hr Average = .09 ppm
PARTICULATE MATTER PM10 * Santa Maria (Brioadway/Library) 93 ug/m3 24-Hr. Avg. (4/85) 33.5 ug/m3 AGM (1985)	Annual Geometric Mean = 50 ug/m3 24 Hr. Average = 150 ug/m3	Annual Geometric Mean = 30 ug/m3 24 Hr. Average = 50 ug/m3
TOTAL SULFATE Santa Barbara (State St.) November 1980 29.3 ug/m3 24-Hr. Avg.	Primary - No Standard Secondary - Same as Above	24 Hr Average = 25 ug/m3

Primary Standard : Necessary to Protect the Public Health.

Secondary Standard: Necessary to Protect the Public Welfare and the Environment.

* Replaces TSP standard. Highest TSP measurement was 1366 µg/m3 at Santa Maria Briarwood, May 1980 (wind dust, and sand particles affected measurement).

References to Table II-4

1. California standards for ozone, carbon monoxide, sulfur dioxide (1-hour), nitrogen dioxide, and particulate matter - PM_{10}, are values that are not to be exceeded. The sulfates, lead, hydrogen sulfide, vinyl chloride, and visibility reducing particles standards are not to be equaled or exceeded.

2. National standards, other than ozone and those based on annual averages or annual geometric means, are not to be exceeded more than once a year. The ozone standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above the standard is equal to or less than one.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 mm of mercury. All measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 mm of Hg (1,013.2 millibar); ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent procedure which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health. Each state must attain the primary standards no later than three years after that state's implementation plan is approved by the Environmental Protection Agency (EPA).

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant. Each state must attain the secondary standards within a "reasonable time" after the implementation plan is approved by the EPA.

7. Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.

8. At locations where the state standards for ozone and/or suspended particulate matter are violated. National standards apply elsewhere.

9. Prevailing visibility is defined as the greatest visibility which is attained or surpassed around at least half of the horizon circle, but not necessarily in continuous sectors.

ARB Fact Sheet 38
(Revised 7/88)

Penfield & Smith
ENGINEERS • SURVEYORS

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805-963-9532 • FAX 805-966-9801

1000 MILL STREET
SAN LUIS OBISPO, CALIFORNIA 93401
805-544-5445 • FAX 805-544-4872

W.O. 9769.02

December 16, 1992

RECEIVED
DEC 16 1992
CITY OF SANTA BARBARA
HOUSING AND REDEVELOPMENT

Ms. Teri Malinowski
City Redevelopment Agency
630 Garden Street
Santa Barbara, CA 93101

Subject: Request for Information on the Proposed Waterfront Park, Hotel and Hostel

Dear Ms. Malinowski:

In response to the letter from Interface dated November 17, 1992, we have provided a construction schedule and clarification of the water elements of the proposed Waterfront Park and Hotel.

Work	Equipment	No.
Fencing	1-2 Ton Flatbed Truck	3
Demolition	Cat D-6C Dozer	1
Clearing	Cat D-8N Dozer	1
	Cat 930 Rubber Tired Loader	3
Well Points	Drill Rig	1
	Hydro-Crane	1
Tree Removal	Man-Lift	1
	Hydro-Crane	1
	2-Ton Flatbed Truck	2
Earthwork	Cat D-6C Dozer	1
	Cat D-8N Dozer	1
	Cat 825 Compactor	2
	Cat 623 Scraper	3
	Cat 140G Motor Grader	1
	Water Trucks	1

P&S

Work	Equipment	No.
Retaining Wall	Cat 235 Backhoe	1
Storm Drains	Cat 235 Backhoe	1
	Cat 930 Loader	1
Offsite Roads	Cat 140G Motor Grader	1
	Barber Greene Paver	1
	Cat D-6C Dozer	1
	Cat 613 Scraper	2
	Water Truck	1
	PS 130 Rubber Tired Roller	1
	CB 534 Vibratory Roller	1
Grading Wet Areas	Cat D-4C Dozer	1
	Cat D-6C Dozer	1
	Cat 930 Loader	1
	Cat 913 Scraper	1
On-Site Well Const.	Cat 245C Backhoe	1
On-Site Bridge Const.	Cat 235C Backhoe	1
	Hydro-Crane	1
On-Site Paving	Barker Greene Paver	1
	PS 130 Rubber Tired Roller	1
	CB 534 Vibratory Roller	1
Hotel Construction	Cat 235C Backhoe	2
	Cat D-6C Dozer	1
	Cat D-8N Dozer	1
	Hydro-Crane	1
Utility Construction	Cat 235C Backhoe	1
	Hydro-Crane	1
	Cat 930 Loader	1
Landscaping, Irrigation, & Lighting	Cat 235C Backhoe	1

The water within the Lagoon will be separated from Laguna Creek by an earthen berm. All of the water systems will be separated so that there will be no mixing of water between the Wilds and the Lagoon. The proposed bridges will camouflage the bermed areas that allow for separation and as a result, the bridges will convey the image of the water systems being connected.

P&S

Both the Lagoon and the Wilds will be drained either annually or biannually through a drain pipe that discharges into Laguna Creek. The water will be pumped from the Lagoon and Wilds into Laguna Creek.

The westerly two walkways will be bridged in order to avoid the existing wetland. The walkway by the pumphouse will be the only walkway within the wetland that will involve laying a pipe and filling on top to allow for the wetland to remain in its current state.

The Wild's waterways will not involve the existing wetlands.

If you have any questions, please do not hesitate to contact me at 963-9532.

Very truly yours,

PENFIELD & SMITH

Michael A. Caccese

Michael A. Caccese

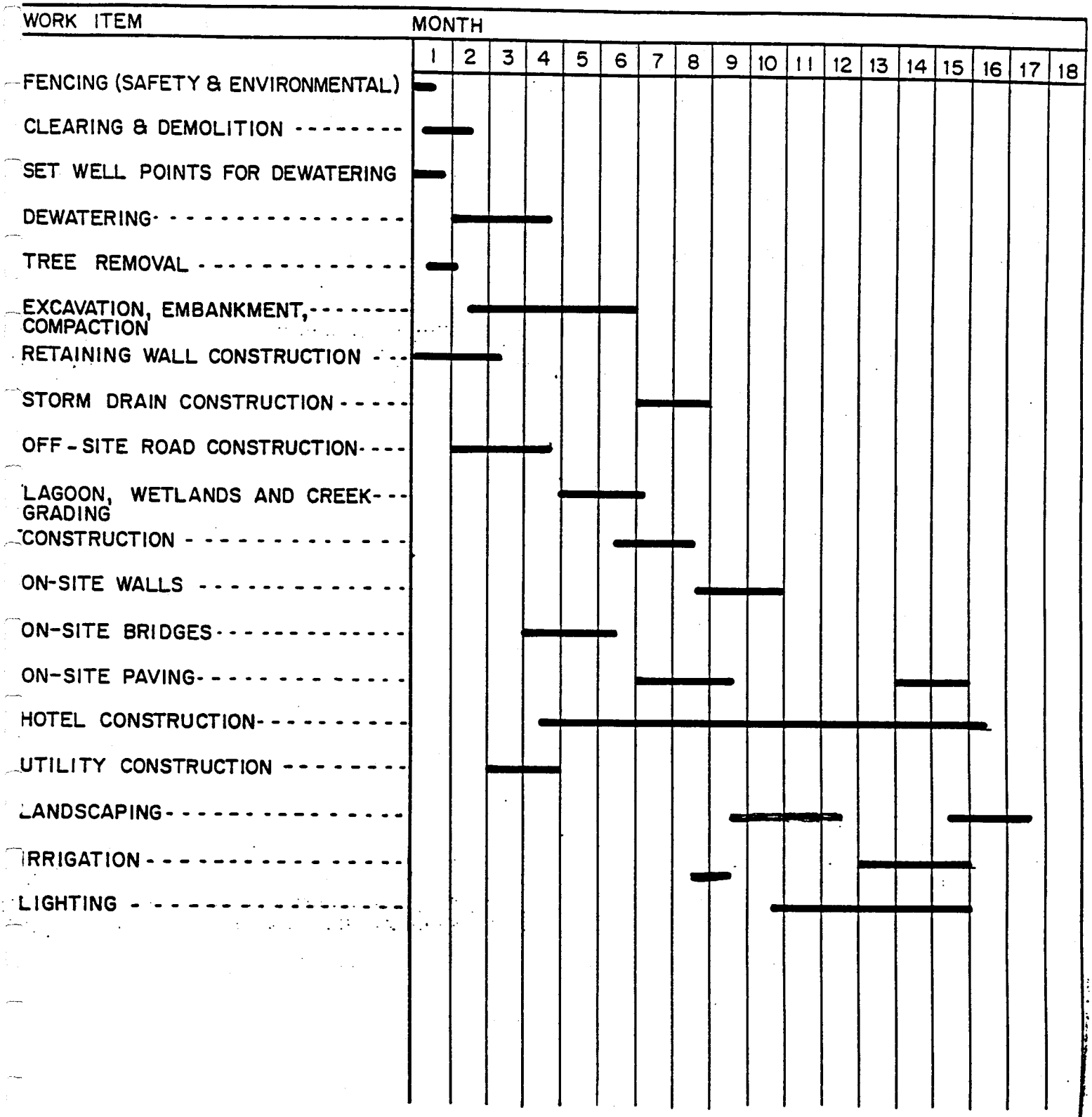
MAC:ss

cc: John Cahill
George Girvin

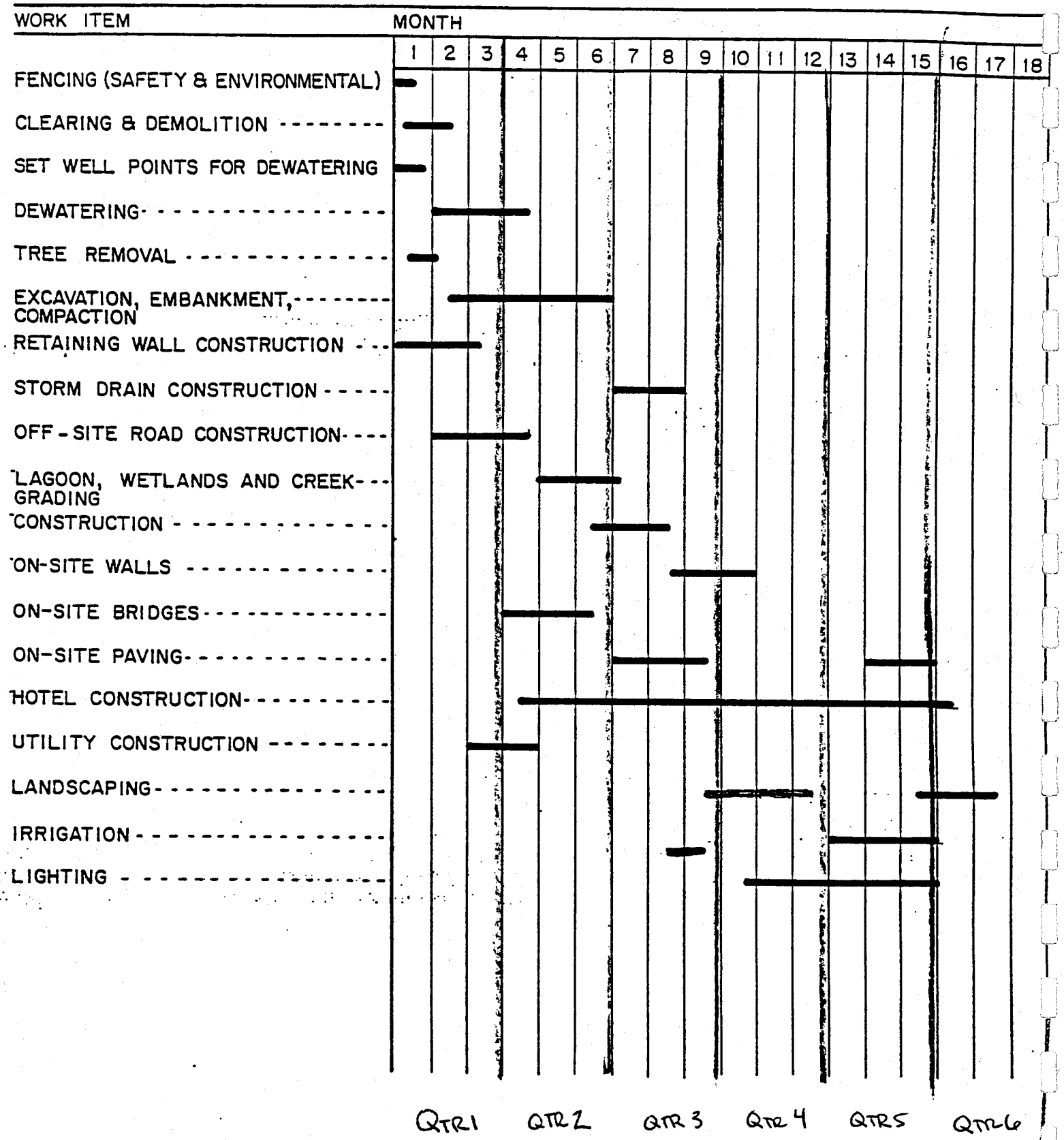
(9769tml)

P&S

PRELIMINARY CONSTRUCTION SCHEDULE
SANTA BARBARA WATERFRONT PARK / HOTEL



PRELIMINARY CONSTRUCTION SCHEDULE
SANTA BARBARA WATERFRONT PARK / HOTEL



SALSIPUEDES STREET EXTENSION

CONSTRUCTION EQUIPMENT AND SCHEDULING

1. Grading and excavation (10 working days)

   1 motor grader
   2 skip loaders
   4 dump trucks
   1 water truck
   2 pick-ups

2. Compaction and placement of aggregate (10 working days)

   1 motor grader
   2 skip loaders
   4 belly dumpers
   1 roller/compactor
   1 water truck
   2 pick-ups

3. Paving and installation of curb, sidewalk and gutter (30 working days)

   2 skip loaders
   2 rollers
   1 paving machine
   1 water truck
   2 pick-ups

A crew of 10 will be required for completion of the project.

This does not include the work done by Southern Pacific on the crossing itself. This will involve work on the signals, controllers and tracks and rubberizing the crossing.

EMFAC7PC EMISSION FACTORS
VERSION :EMFAC7D ...11/88

YEAR : 1995 TEMPERATURE : 50
PERCENT VMT COLD : 30.0 PERCENT VMT HOT : 70.0

PM10 Percent Exhaust : 99.1 Tire Wear : 40.0
Sulfur Content Leaded :450.0 ppm Unleaded :200.0 ppm
Sulfur Content Diesel :0.280 %

GRAMS PER MILE

Speed	TOG	CO	NOX
35 MPH	2.49	6.81	12.83
55 MPH	1.83	6.03	17.63

Idle Emission Factors

TOG	0.64	Gr/Min	Fuel Use	5.8	MPG
CO	2.67	Gr/Min	PM10	1.869	GR/MILE
NOx	1.92	Gr/Min	Sox	3.107	Gr/Mile

WITH 261 WORKING DAYS PER YEAR, THE AVERAGE MONTH CONTAINS 22 WORKING DAYS.

ON-SITE EQUIPMENT EMISSION DATA

QTR 1:

FENCING 0.66 MONTH = 14.5 DAYS

- 3 FLATBED TRUCKS x 14.5 DAYS = 43.5 DAY EQUIVALENT FB TRUCK

CLEARING 1.25 MONTH = 27.5 DAYS

- 2 DOZERS x 27.5 DAYS = 55 DAY EQUIVALENT DOZER
- 1 LOADER x 27.5 DAYS = 27.5 DAY EQUIVALENT LOADER

WELL POINTS 0.75 MONTH = 16.5 DAYS

- 1 DRILL RIG x 16.5 DAYS = 16.5 DAY EQUIVALENT D.R.
- 1 HYDRO CRANE x 16.5 DAYS = 16.5 " H.C.

TREE REMOVAL 0.8 MONTH = 17.5 DAYS

- 1 MAN-LIFT x 17.5 DAYS = 17.5 DAY EQUIVALENT M.L.
- 1 HYDRO CRANE x 17.5 DAYS = 17.5 DAY EQUIVALENT H.C.
- 2 FLATBED TRUCKS x 17.5 DAYS = 35 DAY " F.B.T.

EARTHWORK 1.5 MONTH = 33 DAYS

- 2 DOZER x 33 DAYS = 66 DAY EQUIVALENT DOZER
- 2 COMPACTOR x 33 DAYS = 66 " COMP.
- 3 SCRAPER x 33 DAYS = 99 " SCR.
- 1 MOTOR GRADER x 33 DAYS = 33 " M.G.
- 1 WATER TRUCK x 33 DAYS = 33 " W.T.

RETAINING WALL 2.3 MONTH = 51 DAYS

- 1 BACKHOE x 51 DAYS = 51 DAY EQUIVALENT B.H.

OFFSITE ROADS 2 MONTH = 44 DAYS

- 1 MOTOR GRADER x 44 DAYS = 44 DAY EQUIVALENT M.G.
- 1 PAVER x 44 " = 44 " PAVER
- 1 DOZER x 44 " = 44 " DOZER
- 2 SCRAPER x 44 " = 88 " SCR.
- 1 WATER TRUCK x 44 " = 44 " W.T.
- 2 ROLLER x 44 " = 88 " ROLLER

UTILITY 1 MONTH = 22 DAYS

• 1	BACKHOE	x 22 DAYS	=	22 DAY EQUIVALENT		B.H.
• 1	HYDRO CRANE	x 22 "	=	22 "		H.C.
• 1	LOADER	x 22 "	=	22 "		LOADER

QTR #1 TOTALS: (IN EQUIVALENT DAYS)

FLATBED TRUCK DAYS	=	78.5
DOZER DAYS	=	165.0
LOADER DAYS	=	49.5
DRILL RIG DAYS	=	16.5
HYDRO CRANE DAYS	=	56.0
MAN-LIFT DAYS	=	17.5
COMPACTOR DAYS	=	66.0
SCRAPER DAYS	=	187.0
MOTOR GRADER DAYS	=	77.0
WATER TRUCK DAYS	=	77.0
BACKHOE DAYS	=	73.0
PAVER DAYS	=	44.0
ROLLER DAYS	=	88.0

QTR #2:

EARTHWORK 3 MONTH = 66 DAYS

• 2	DOZER	x 66 DAYS	=	132 DAY EQUIVALENT		DOZER
• 2	COMPACTOR	x 66 "	=	132 "		COMPACT.
• 3	SCRAPER	x 66 "	=	198 "		SCR.
• 1	MOTOR GRADER	x 66 "	=	66 "		M.G.
• 1	WATER TRUCK	x 66 "	=	66 "		W.T.

OFFSITE ROADS 0.75 MONTH = 16.5 DAYS

• 1	MOTOR GRADER	x 16.5 DAY	=	16.5 DAY EQUIVALENT		M.G.
• 1	PAVER	x 16.5 "	=	16.5 "		PAVER
• 1	DOZER	x 16.5 "	=	16.5 "		DOZER
• 2	SCRAPER	x 16.5 "	=	33.0 "		SCR.
• 1	WATER TRUCK	x 16.5 "	=	16.5 "		W.T.
• 2	ROLLER	x 16.5 "	=	33.0 "		ROLLER

WETLAND GRADING 2 MONTHS = 66 DAYS

• 2 DOZER	×	66 DAYS	=	132	EQUIVALENT DAYS	DOZER
• 1 LOADER	×	66 "	=	66	"	LOADER
• 1 SCRAPER	×	66 "	=	66	"	SCRAPER

ON-SITE BRIDGES 2.5 MONTHS = 55 DAYS

• 1 BACKHOE	×	55 DAYS	=	55	EQUIVALENT DAYS	B.H.
• 1 HYDRO CRANE	×	55 DAYS	=	55	"	H.C.

HOTEL CONSTRUCTION 2.5 MONTHS = 55 DAYS

• 2 BACKHOE	×	55 DAYS	=	110	EQUIVALENT DAYS	B.H.
• 2 DOZER	×	55 DAYS	=	110	"	DOZER
• 1 HYDRO CRANE	×	55 DAYS	=	55	"	H.C.

UTILITY 1 MONTH = 22 DAYS

• 1 BACKHOE	×	22 DAYS	=	22	EQUIVALENT DAYS	B.H.
• 1 HYDRO CRANE	×	22 "	=	22	"	H.C.
• 1 LOADER	×	22 "	=	22	"	LOADER

QTR # 2 TOTALS: (IN EQUIVALENT DAYS)

DOZER DAYS	=	390.5
COMPACTOR DAYS	=	132.0
SCRAPER DAYS	=	297.0
MOTOR GRADER DAYS	=	82.5
WATER TRUCK DAYS	=	82.5
PAVER DAYS	=	16.5
ROLLER DAYS	=	33.0
LOADER DAYS	=	88.0
BACKHOE DAYS	=	187.0
HYDRO-CRANE DAYS	=	110.0

QTR # 3:

STORM DRAIN 2 MONTH = 44 DAYS

• 1 BACKHOE	×	44 DAYS	=	44	EQUIVALENT DAYS	B.H.
• 1 LOADER	×	44 DAYS	=	44	"	LOADER

ON-SITE WELLS (WALLS?) 1.3 MONTHS = 28.5 DAYS

- 1 BACKHOE x 28.5 DAYS = 28.5 DAY EQUIVALENT B.H.

ON-SITE PAVING 2.7 MONTHS = 59.5 DAYS

- 1 PAVER x 59.5 DAYS = 59.5 EQUIVALENT DAYS PAVER
- 2 ROLLER x 59.5 DAYS = 119.0 " ROLLER

HOTEL CONSTRUCTION 3 MONTHS = 66 DAYS

- 2 BACKHOE x 66 DAYS = 132 DAY EQUIVALENT B.H
- 2 DOZER x 66 DAYS = 132 DAY EQUIVALENT DOZ.
- 1 HYDRO-CRANE x 66 DAYS = 66 DAY " H.C.

LANDSCAPING 0.3 MONTHS = 7 DAYS

- 1 BACKHOE x 7 DAYS = 7 DAY EQUIVALENT B.H.

IRRIGATION 1 MONTH = 22 DAYS

- 1 BACKHOE x 22 DAYS = 22 DAY EQUIVALENT B.H.

EARTHWORK FOR HOSTEL SITE 1.0 MONTH = 22 DAYS

WORST CASE ASSUMPTION IS THAT ALL EARTHWORK FOR THE HOSTEL SITE (INCLUDING FOUNDATION/ UTILITIES EXCAVATION) WOULD REQUIRE ONE MONTH (22 WORKING DAYS) TO COMPLETE.

- 1 DOZER x 22 DAYS = 22 DAY EQUIVALENT DOZER
- 1 BACKHOE x 22 DAYS = 22 DAY EQUIVALENT B.H.

QTR # 3 TOTALS : (IN EQUIVALENT DAYS)

BACKHOE DAYS	=	255.5
LOADER DAYS	=	44.0
PAVER DAYS	=	59.5
ROLLER DAYS	=	119.0
DOZER DAYS	=	154.0
HYDRO - CRANE DAYS	=	66.0

QTR # 4

ON-SITE WELLS (WALLS?) 1 MONTH = 22 DAYS

- BACKHOE x 22 DAYS = 22 DAY EQUIVALENT B.H.

HOTEL CONSTRUCTION 3 MONTHS = 66 DAYS

- 2 BACKHOE x 66 DAYS = 132 DAY EQUIVALENT B.H.
- 2 DOZER x 66 DAYS = 132 " DOZER
- 1 HYDRO-CRANE x 66 DAYS = 66 " H.C.

LANDSCAPING - 2.7 MONTHS = 59.5 DAYS

- 1 BACKHOE x 59.5 DAYS = 59.5 DAY EQUIVALENT B.H.

LIGHTING 2.3 MONTHS = 50.5 DAYS

- 1 BACKHOE x 50.5 DAYS = 50.5 DAY EQUIV. B.H.

QTR #4 TOTALS: (IN EQUIVALENT DAYS)

BACKHOE DAYS	=	264.0
DOZER DAYS	=	132.0
HYDRO-CRANE DAYS	=	66.0

QTR #5:

ON-SITE PAVING 2 MONTHS = 44 DAYS

- 1 PAVER x 44 DAYS = 44 DAY EQUIVALENT PAVER
- 2 ROLLER x 44 DAYS = 88 DAY " ROLLER

HOTEL CONSTRUCTION 3 MONTHS = 66 DAYS

- 2 BACKHOE x 66 DAYS = 132 DAY EQUIVALENT B.H.
- 2 DOZER x 66 DAYS = 132 " DOZER
- 1 HYDRO-CRANE x 66 DAYS = 66 " H.C.

LANDSCAPING 0.5 MONTHS = 11 DAYS

- 1 BACKHOE x 11 DAYS = 11 DAY EQUIVALENT B.H.

IRRIGATION 3 MONTHS = 66 DAYS

- 1 BACKHOE x 66 DAYS = 66 DAY EQUIVALENT B.H.

LIGHTING 3 MONTHS = 66 DAYS

- 1 BACKHOE x 66 DAYS = 66 DAY EQUIVALENT B.H.

SALSIPUEDES EXTENSION (GRADING & EXCAVATION) - 10 DAYS

• 1	MOTOR GRADER	x	10	DAYS	=	10	DAY EQUIV.	M.G.
• 2	SKIP LOADERS	x	10	DAYS	=	20	DAY EQUIV.	LOADER
• 4	DUMP TRUCKS	x	10	DAYS	=	40	DAY EQUIV.	D.T.
• 1	WATER TRUCK	x	10	DAYS	=	10	DAY EQUIV.	W.T.
• 2	PICK-UPS	x	10	DAYS	=	20	DAY EQUIV.	P.U.

SALSIPUEDES EXTENSION (COMPACTION) - 10 DAYS

• 1	MOTOR GRADER	x	10	DAYS	=	10	DAY EQUIV.	M.G.
• 2	SKIP LOADERS	x	10	DAYS	=	20	"	LOADER
• 4	DUMP TRUCKS	x	10	DAYS	=	40	"	D.T.
• 1	ROLLER	x	10	DAYS	=	10	"	ROLLER
• 1	WATER TRUCK	x	10	DAYS	=	10	"	W.T.
• 2	PICK-UPS	x	10	DAYS	=	20	"	P.U.

QTR #5 TOTALS: (IN EQUIVALENT DAYS)

PAVER DAYS	=	44.0
BACKHOE DAYS	=	275.0
DOZER DAYS	=	132.0
HYDRO-CRANE DAYS	=	66.0
MOTOR GRADER DAYS	=	20.0
LOADER DAYS	=	40.0
DUMP TRUCK DAYS	=	80.0
WATER TRUCK DAYS	=	20.0
ROLLER DAYS	=	98.0
PICK-UP DAYS	=	40.0

QTR #6:

HOTEL CONSTRUCTION 0.5 MONTH = 11 DAYS

• 2	BACKHOE	x	11	DAYS	=	22	DAY EQUIVALENT	B.H.
• 2	DOZER	x	11	DAYS	=	22	"	DOZER
• 1	HYDRO-CRANE	x	11	DAYS	=	11	"	H.C.

LANDSCAPING 1.7 MONTHS = 37.5 DAYS

• 1 BACKHOE x 37.5 DAYS = 37.5 DAY EQUIVALENT B.H.

SALSIPUEDES EXTENSION (PAVING / CEMENT WORK) - 30 DAYS

• 2 LOADERS	x	30 DAYS	=	60 DAY	EQUIVALENT	LOADER
• 2 ROLLERS	x	30 DAYS	=	60	"	ROLLER
• 1 PAVING MACHINE	x	30 DAYS	=	30	"	PAVER
• 1 WATER TRUCK	x	30 DAYS	=	30	"	W.T.
• 2 PICK-UPS	x	30 DAYS	=	60	"	P.U.

QTR #6 TOTALS: (IN EQUIVALENT DAYS)

BACKHOE DAYS	=	59.5
DOZER DAYS	=	22.0
HYDRO-CRANE DAYS	=	11.0
LOADER DAYS	=	60.0
ROLLER DAYS	=	60.0
PAVING MACHINE DAYS	=	30.0
WATER TRUCK DAYS	=	30.0
PICK-UP TRUCK DAYS	=	60.0

OFFSITE EMISSIONS DATA:

• 26 TRUCK-TRIPS - EXPORT MATERIALS FROM SALSIPUEDES EXTENSION TO TAJIGUAS (CONSERVATIVE WORST-CASE).

ASSUME: 1,400 CUBIC YARDS OF EXPORT WASTE MATERIALS. RETURNING TRUCKS COULD CARRY AGGREGATE FROM SB SAND/TOPSOIL; OTHERWISE, ROAD-BASE MATERIAL MAY BE AVAILABLE FROM ADJACENT RECYCLE PLANT (IN WHICH CASE, TRUCKS WOULD MAKE THE RETURN TRIP EMPTY, AND A SKIP LOADER COULD TRANSPORT THE MATERIALS).

EACH TRIP: 2 MILES @ 35 MPH (52 TOTAL MILES)
26 MILES @ 55 MPH (676 TOTAL MILES)

TIMING: QTR #5

OFFSITE CONSTRUCTION IMPACTS (CONT'D)

- 48 TRIPS - DEBRIS AND EXPORT MATERIALS (OUTBOUND)

  FILL AND TOPSOIL (INBOUND TO PARK/HOTEL SITE).

ASSUME: DEBRIS TO TAJIGUAS; FILL MATERIALS FROM SANTA BARBARA SAND & TOPSOIL (GOLETA).

THEREFORE, EACH TRIP CAN SERVE EXPORT & IMPORT.

EACH TRIP: 2 MILES @ 35 MPH (96 TOTAL MILES)
46 MILES @ 55 MPH (2208 TOTAL MILES)

ACCOUNTS FOR 2,600 CUBIC YARDS OF DEBRIS AND IMPORTED FILL.
TIMING: QTR # 1

- 37 TRIPS - IMPORTED FILL MATERIALS FOR HOSTEL SITE

ASSUME: WORST-CASE, SOURCE IS SB SAND/TOPSOIL IN GOLETA.

EACH TRIP: 2 MILES @ 35 MPH (74 TOTAL MILES)
26 MILES @ 55 MPH (962 TOTAL MILES)

ACCOUNTS FOR 2,000 CUBIC YARDS OF IMPORT TO HOSTEL.
TIMING: QTR # 3

- 256 TRIPS - IMPORTED FILL MATERIALS FOR PARK/HOTEL SITE.

ASSUME: WORST-CASE, SOURCE IS SB SAND/TOPSOIL IN GOLETA.

ACCOUNTS FOR 13,800 CUBIC YARDS OF IMPORT TO PARK/HOTEL
TIMING: QTR # 2

EACH TRIP: 2 MILES @ 35 MPH (512 TOTAL MILES)
26 MILES @ 55 MPH (6,656 TOTAL MILES)

WATERFRONT PARK, HOTEL & HOSTEL PROJECT - CONSTRUCTION AIR QUALITY

FIRST QUARTER EMISSIONS

EQUIPMENT	FIRST QUARTER	NOX	ROC	PM10	LOAD FACTOR	DAYS *
FLATBED TRUCK	Emission Rate (lb/hr)	4.17	0.31	0.23	25%	78.5
	Total Emissions (lbs)	654.69	48.67	36.11		
DOZER	Emission Rate (lb/hr)	4.17	0.26	0.15	100%	165
	Total Emissions (lbs)	5504.4	343.2	198.00		
LOADER	Emission Rate (lb/hr)	1.89	0.29	0.15	100%	49.5
	Total Emissions (lbs)	748.44	114.84	59.40		
DRILL RIG	Emission Rate (lb/hr)	1.69	0.18	0.08	100%	16.5
	Total Emissions (lbs)	223.08	23.76	10.56		
HYDRO-CRANE	Emission Rate (lb/hr)	1.69	0.18	0.08	100%	56
	Total Emissions (lbs)	757.12	80.64	35.84		
MAN-LIFT	Emission Rate (lb/hr)	1.69	0.18	0.08	100%	17.5
	Total Emissions (lbs)	236.6	25.2	11.20		
COMPACTOR	Emission Rate (lb/hr)	0.86	0.08	0.05	100%	66
	Total Emissions (lbs)	454.08	42.24	26.40		
SCRAPER	Emission Rate (lb/hr)	3.84	0.43	0.37	100%	187
	Total Emissions (lbs)	5744.64	643.28	553.52		
MOTOR GRADER	Emission Rate (lb/hr)	0.71	0.05	0.05	100%	77
	Total Emissions (lbs)	437.36	30.8	30.80		
WATER TRUCK	Emission Rate (lb/hr)	4.17	0.31	0.23	25%	77
	Total Emissions (lbs)	642.18	47.74	35.42		
BACKHOE	Emission Rate (lb/hr)	1.69	0.18	0.13	100%	73
	Total Emissions (lbs)	986.96	105.12	75.92		
PAVER	Emission Rate (lb/hr)	1.69	0.18	0.13	100%	44

	Total Emissions (lbs)	594.88	63.36	45.76		
ROLLER	Emission Rate (lb/hr)	0.86	0.08	0.05	100%	88
	Total Emissions (lbs)	605.44	56.32	35.20		
	COMPOSITE TOTAL EMISSIONS FOR THIS QUARTER (LBS):	17589.87	1625.17	1154.13		
	TONS THIS QUARTER:	8.79	0.81	0.58		

SECOND QUARTER EMISSIONS

EQUIPMENT	SECOND QUARTER	NOX	ROC	PM10	LOAD FACTOR	DAYS *
DOZER	Emission Rate (lb/hr)	4.17	0.26	0.15	100%	390.5
	Total Emissions (lbs)	13027.08	812.24	468.60		
COMPACTOR	Emission Rate (lb/hr)	0.86	0.08	0.05	100%	132
	Total Emissions (lbs)	908.16	84.48	52.80		
SCRAPER	Emission Rate (lb/hr)	3.84	0.43	0.37	100%	297
	Total Emissions (lbs)	9123.84	1021.68	879.12		
MOTOR GRADER	Emission Rate (lb/hr)	0.71	0.05	0.05	100%	82.5
	Total Emissions (lbs)	468.6	33	33.00		
WATER TRUCK	Emission Rate (lb/hr)	4.17	0.31	0.23	25%	82.5
	Total Emissions (lbs)	688.05	51.15	37.95		
PAVER	Emission Rate (lb/hr)	1.69	0.18	0.13	100%	16.5
	Total Emissions (lbs)	223.08	23.76	17.16		
ROLLER	Emission Rate (lb/hr)	0.86	0.08	0.05	100%	33
	Total Emissions (lbs)	227.04	21.12	13.20		
LOADER	Emission Rate (lb/hr)	1.89	0.29	0.15	100%	88
	Total Emissions (lbs)	1330.56	204.16	105.60		

BACKHOE	Emission Rate (lb/hr)	1.69	0.18	0.13	100%	187
	Total Emissions (lbs)	2528.24	269.28	194.48		
HYDRO-CRANE	Emission Rate (lb/hr)	1.69	0.18	0.08	100%	110
	Total Emissions (lbs)	1487.2	158.4	70.40		
	COMPOSITE TOTAL EMISSIONS FOR THIS QUARTER (LBS):	30011.85	2679.27	1872.31		
	TONS THIS QUARTER:	15.01	1.34	0.94		

THIRD QUARTER EMISSIONS

EQUIPMENT	THIRD QUARTER	NOX	ROC	PM10	LOAD FACTOR	DAYS *
BACKHOE	Emission Rate (lb/hr)	1.69	0.18	0.13	100%	255.5
	Total Emissions (lbs)	3454.36	367.92	265.72		
LOADER	Emission Rate (lb/hr)	1.89	0.29	0.15	100%	44
	Total Emissions (lbs)	665.28	102.08	52.80		
PAVER	Emission Rate (lb/hr)	1.69	0.18	0.13	100%	59.5
	Total Emissions (lbs)	804.44	85.68	61.88		
ROLLER	Emission Rate (lb/hr)	0.86	0.08	0.05	100%	119
	Total Emissions (lbs)	818.72	76.16	47.60		
DOZER	Emission Rate (lb/hr)	4.17	0.26	0.15	100%	154
	Total Emissions (lbs)	5137.44	320.32	184.80		
HYDRO-CRANE	Emission Rate (lb/hr)	1.69	0.18	0.08	100%	66
	Total Emissions (lbs)	892.32	95.04	42.24		
	COMPOSITE TOTAL EMISSIONS FOR THIS QUARTER (LBS):	11772.6	1047.2	655.0		
	TONS THIS QUARTER:	5.89	0.52	0.33		

FOURTH QUARTER EMISSIONS

EQUIPMENT	FOURTH QUARTER	NOX	ROC	PM10	LOAD FACTOR	DAYS *
BACKHOE	Emission Rate (lb/hr)	1.69	0.18	0.13	100%	264
	Total Emissions (lbs)	3569.28	380.16	274.56		
DOZER	Emission Rate (lb/hr)	4.17	0.26	0.15	100%	132
	Total Emissions (lbs)	4403.52	274.56	158.40		
HYDRO-CRANE	Emission Rate (lb/hr)	1.69	0.18	0.08	100%	66
	Total Emissions (lbs)	892.32	95.04	42.24		
	COMPOSITE TOTAL EMISSIONS FOR THIS QUARTER (LBS):	8865.12	749.76	475.2		
	TONS THIS QUARTER:	4.43	0.37	0.24		

FIFTH QUARTER EMISSIONS

EQUIPMENT	FIFTH QUARTER	NOX	ROC	PM10	LOAD FACTOR	DAYS *
PAVER	Emission Rate (lb/hr)	1.69	0.18	0.13	100%	44
	Total Emissions (lbs)	594.88	63.36	45.76		
ROLLER	Emission Rate (lb/hr)	0.86	0.08	0.05	100%	98
	Total Emissions (lbs)	674.24	62.72	39.20		
BACKHOE	Emission Rate (lb/hr)	1.69	0.18	0.13	100%	275
	Total Emissions (lbs)	3718	396	286.00		
DOZER	Emission Rate (lb/hr)	4.17	0.26	0.15	100%	132
	Total Emissions (lbs)	4403.52	274.56	158.40		
HYDRO-CRANE	Emission Rate (lb/hr)	1.69	0.18	0.08	100%	66
	Total Emissions (lbs)	892.32	95.04	42.24		
MOTOR GRADER	Emission Rate (lb/hr)	0.71	0.05	0.05	100%	20

	Total Emissions (lbs)	113.6	8	8.00		
LOADER	Emission Rate (lb/hr)	1.89	0.29	0.15	100%	40
	Total Emissions (lbs)	604.8	92.8	48.00		
DUMP TRUCK *	Emission Rate (lb/hr)	4.17	0.31	0.23	5%	80
	Total Emissions (lbs)	133.44	9.92	7.36		
WATER TRUCK	Emission Rate (lb/hr)	4.17	0.31	0.23	25%	20
	Total Emissions (lbs)	166.8	12.4	9.20		
PICK-UP TRUCK	Emission Rate (lb/hr)	0.41	0.75	0.02	25%	40
	Total Emissions (lbs)	32.8	60	1.60		

* Dump truck emissions primarily quantified by off-site per mile factor.

COMPOSITE TOTAL EMISSIONS FOR THIS QUARTER (LBS):	11470.6	1183.8	813.2
TONS THIS QUARTER:	5.74	0.59	0.41

SIXTH QUARTER EMISSIONS

EQUIPMENT	SIXTH QUARTER	NOX	ROC	PM10	LOAD FACTOR	DAYS *
BACKHOE	Emission Rate (lb/hr)	1.69	0.18	0.13	100%	59.5
	Total Emissions (lbs)	804.44	85.68	61.88		
DOZER	Emission Rate (lb/hr)	4.17	0.26	0.15	100%	22
	Total Emissions (lbs)	733.92	45.76	26.40		
HYDRO-CRANE	Emission Rate (lb/hr)	1.69	0.18	0.08	100%	11
	Total Emissions (lbs)	148.72	15.84	7.04		
ROLLER	Emission Rate (lb/hr)	0.86	0.08	0.05	100%	60
	Total Emissions (lbs)	412.8	38.4	24.00		
LOADER	Emission Rate (lb/hr)	1.89	0.29	0.15	100%	60
	Total Emissions (lbs)	907.2	139.2	72.00		

PAVER	Emission Rate (lb/hr)	1.69	0.18	0.13	60%	30
	Total Emissions (lbs)	243.36	25.92	18.72		
WATER TRUCK	Emission Rate (lb/hr)	4.17	0.31	0.23	25%	30
	Total Emissions (lbs)	250.2	18.6	13.80		
PICK-UP TRUCK	Emission Rate (lb/hr)	0.41	0.75	0.02	25%	60
	Total Emissions (lbs)	49.2	90	2.40		
	COMPOSITE TOTAL EMISSIONS FOR THIS QUARTER (LBS):	3549.8	459.4	226.2		
	TONS THIS QUARTER:	1.77	0.23	0.11		

DUST EMISSIONS FROM GRADING:

- ENTIRE AREA IS 16.65 ACRES
- EARTHWORK FOR THE FIRST TWO QUARTERS WOULD INVOLVE THE ENTIRE SITE
- EARTHWORK FOR THE REMAINING QUARTERS (3-6) WOULD INVOLVE APPROXIMATELY 30% OF THE SITE

PRELIMINARY EARTHWORK: 16.65 ACRES X 1.2 TONS/MONTH/ACRE X 0.5 (PM10 FRACTION) = 10.0 TONS/MONTH PM10
FINISH EARTHWORK: 5 ACRES X 1.2 TONS/MONTH/ACRE X 0.5 (PM10 FRACTION) = 3 TONS/MONTH PM10
SALSIPUEDES EXTENSION: 0.86 ACRES X 1.2 TONS/MONTH/ACRE X 0.5 (PM10 FRACTION) = 0.52 TONS/MONTH

QUARTERLY PM10 GRADING EMISSIONS TOTALS
IN TONS:

FIRST QUARTER: 10.0 TONS/MONTH X 3 MONTHS = 30 TONS X 50% (WATER CONTROL) = 15 TONS
SECOND QUARTER: 10.0 TONS/MONTH X 3 MONTHS = 30 TONS X 50% (WATER CONTROL) = 15 TONS
THIRD QUARTER: 3.0 TONS/MONTH X 3 MONTHS = 9 TONS X 50% (WATER CONTROL) = 4.5 TONS
FOURTH QUARTER: 3.0 TONS/MONTH X 3 MONTHS = 9 TONS X 50% (WATER CONTROL) = 4.5 TONS
FIFTH QUARTER: 3.0 TONS/MONTH X 3 MONTHS = 9 TONS X 50% (WATER CONTROL) = 4.5 TONS
0.52 TONS/MONTH X 0.5 MONTHS = 0.26 X 50% (WATER CONTROL) = 0.13 TONS
SIXTH QUARTER: 3.0 TONS/MONTH X 1.7 MONTHS = 5.1 TONS X 50% (WATER CONTROL) = 2.55 TONS

OFFSITE EMISSIONS FROM TRANSPORT TRUCK OPERATIONS (DIESEL TRUCKS):

FIRST QUARTER:		NOX	ROC	PM10	LOAD FACTOR	MILES
35 MPH TRUCK OPERATIONS	Emission Rate (lb/mi)	0.028	0.005	0.004	100%	96
	Total Emissions (lbs)	2.688	0.48	0.38		
55 MPH TRUCK OPERATIONS	Emission Rate (lb/mi)	0.039	0.004	0.004	100%	2208
	Total Emissions (lbs)	86.112	8.832	8.83		
	COMPOSITE TOTAL EMISSIONS FOR THIS QUARTER (LBS):	88.8	9.3	9.2		
	TONS THIS QUARTER:	0.04	0.00	0.00		

SECOND QUARTER:		NOX	ROC	PM10	LOAD FACTOR	MILES
35 MPH TRUCK OPERATIONS	Emission Rate (lb/mi)	0.028	0.005	0.004	100%	512
	Total Emissions (lbs)	14.336	2.56	2.05		
55 MPH TRUCK OPERATIONS	Emission Rate (lb/mi)	0.039	0.004	0.004	100%	6656
	Total Emissions (lbs)	259.584	26.624	26.62		
	COMPOSITE TOTAL EMISSIONS FOR THIS QUARTER (LBS):	273.9	29.2	28.7		
	TONS THIS QUARTER:	0.14	0.01	0.01		

THIRD QUARTER:		NOX	ROC	PM10	LOAD FACTOR	MILES
35 MPH TRUCK OPERATIONS	Emission Rate (lb/mi)	0.028	0.005	0.004	100%	74
	Total Emissions (lbs)	2.072	0.37	0.30		
55 MPH TRUCK OPERATIONS	Emission Rate (lb/mi)	0.039	0.004	0.004	100%	962
	Total Emissions (lbs)	37.518	3.848	3.85		

	COMPOSITE TOTAL EMISSIONS FOR THIS QUARTER (LBS):	39.6	4.2	4.1
	TONS THIS QUARTER:	0.02	0.002	0.002

FIFTH QUARTER:		NOX	ROC	PM10	LOAD FACTOR	MILES
35 MPH TRUCK OPERATIONS	Emission Rate (lb/mi)	0.028	0.005	0.004	100%	52
	Total Emissions (lbs)	1.456	0.26	0.21		
55 MPH TRUCK OPERATIONS	Emission Rate (lb/mi)	0.039	0.004	0.004	100%	676
	Total Emissions (lbs)	26.364	2.704	2.70		
	COMPOSITE TOTAL EMISSIONS FOR THIS QUARTER (LBS):	27.8	3.0	2.9		
	TONS THIS QUARTER:	0.01	0.001	0.001		

TOTAL QUARTERLY EMISSIONS (IN TONS):	NOX	ROC	PM10
FIRST QUARTER	8.839	0.817	15.582
SECOND QUARTER	15.143	1.354	15.950
THIRD QUARTER	5.906	0.526	4.830
FOURTH QUARTER	4.433	0.375	4.738
FIFTH QUARTER	5.749	0.593	5.038
SIXTH QUARTER	1.775	0.230	2.663

Project Name : SB WATERFRONT WEEKDAY Date : 12-18-1992

Analysis Year = 1995 Temperature = 50
EMFAC7 VERSION : EMFAC7D ...11/88

Unit Type	Trip Rate	Size	Tot Trips	Days Op.
outh Hostel	100.0/Facility	1	100	
otel	8.6/Room	150	1296	
ark	370.0/Park	1	370	1
xisting Uses	200.0/Site	-1	-200	1

	Residential			Commercial	
	Home-Work	Home-Shop	Home-Other	Work	Non-Work
rip Length	5.3	3.4	4.2	4.7	3.6
Started Cold	88.2	40.1	58.0	77.2	27.0
rip Speed	35	35	35	35	35
ercent Trip	27.3	21.2	51.5		

Vehicle Fleetmix

Vehicle Type	Percent Type	Leaded	Unleaded	Diesel
Light Duty Autos	72.8	1.7	95.6	2.7
Light Duty Trucks	14.3	2.2	95.0	2.8
Medium Duty Trucks	4.3	5.3	94.7	0.0
Heavy Duty Trucks	3.9	29.8	70.3	N/A
Heavy Duty Trucks	3.9	N/A	N/A	100.0
Motorcycles	0.9	100.0	N/A	N/A

Project Emissions Report in Lb/Day

Unit Type	TOG	CO	NOx
Youth Hostel	2.1	23.6	1.8
Hotel	26.9	306.3	23.4
Park	6.8	76.1	6.4
Existing Uses	-3.5	-39.4	-3.4

Project Emissions Report in Lb/Day

Unit Type	FUEL USE	PM10	SOx
Youth Hostel	19.5	0.2	0.2
Hotel	252.6	2.1	2.4
Park	68.5	16.2	0.6
Existing Uses	-36.4	-8.5	-0.3

Conversions: TOG X 0.913 = ROC; 32.3 Lb/Day TOG X 0.913 = 29.5 Lb/Day ROC

Ld/Day X 10% = Lb/Peak Hour

29.5 Lb/Day ROC X 10% = 2.95 Lb/Peak Hour ROC
28.2 Lb/Day NOX X 10% = 2.82 Lb/Peak Hour NOX

Project Name : Waterfront Weekend Date : 12-18-1992

Analysis Year = 1995 Temperature = 50
EMFAC7 VERSION : EMFAC7D ...11/88

Unit Type	Trip Rate	Size	Tot Trips	Days Op.
c-th Hostel	100.0/Facility	1	100	
c el	10.5/Room	150	1575	
ark	960.0/Park	1	960	1
xisting Uses	120.0/Site	-1	-120	1

	Residential			Commercial	
	Home-Work	Home-Shop	Home-Other	Work	Non-Work
r p Length	5.3	3.4	4.2	4.7	3.6
Started Cold	88.2	40.1	58.0	77.2	27.0
rip Speed	35	35	35	35	35
e cent Trip	27.3	21.2	51.5		

Vehicle Fleetmix

Vehicle Type	Percent Type	Leaded	Unleaded	Diesel
L ght Duty Autos	72.8	1.7	95.6	2.7
Light Duty Trucks	14.3	2.2	95.0	2.8
Medium Duty Trucks	4.3	5.3	94.7	0.0
H avy Duty Trucks	3.9	29.8	70.3	N/A
Heavy Duty Trucks	3.9	N/A	N/A	100.0
Motorcycles	0.9	100.0	N/A	N/A

Project Emissions Report in Lb/Day

Unit Type	TOG	CO	NOx
Youth Hostel	2.1	23.6	1.8
Hotel	32.7	372.2	28.5
ark	17.6	197.5	16.6
xisting Uses	-2.1	-23.6	-2.0

Project Emissions Report in Lb/Day

Unit Type	FUEL USE	PM10	SOx
outh Hostel	19.5	0.2	0.2
Hotel	306.9	2.5	2.9
Park	177.7	42.1	1.7
xisting Uses	-21.8	-5.1	-0.2

Conversions: TOG X 0.913 = ROC; 50.3 Lb/Day TOG X 0.913 = 45.9 Lb/Day ROC

Ld/Day X 10% = Lb/Peak Hour

45.9 Lb/Day ROC X 10% = 4.59 Lb/Peak Hour ROC
44.9 Lb/Day NOX X 10% = 4.49 Lb/Peak Hour NOX

EMFAC7PC EMISSION FACTORS
VERSION :EMFAC7D ...11/88

YEAR : 1995 TEMPERATURE : 50
PERCENT VMT COLD : 40.0 PERCENT VMT HOT : 20.0

PM10 Percent Exhaust : 99.1 Tire Wear : 40.0
Sulfur Content Leaded :450.0 ppm Unleaded :200.0 ppm
Sulfur Content Diesel :0.280 %

GRAMS PER MILE

Speed	TOG	CO	NOX
10 MPH	4.97	63.02	2.26
15 MPH	3.80	49.65	2.06
20 MPH	2.99	39.52	1.92

Idle Emission Factors

TOG	0.18	Gr/Min	Fuel Use	22.3	MPG
CO	1.72	Gr/Min	PM10	0.167	GR/MILE
NOx	0.16	Gr/Min	Sox	0.191	Gr/Mile

REPORT FOR FILE : CO - CARP/MILPAS

1. Site Variables

U=	1.0 M/S	ZO=	321.0 CM
BRG=	78.0 DEGREES	VD=	0.0 CM/S
CLASS=	D STABILITY	VS=	0.0 CM/S
MIXH=	100.0 M	AMB=	8.0 PPM
SIGTH=	10.0 DEGREES	TEMP=	10.0 DEGREE (C)

2. Link Description

LINK DESCRIPTION	LINK COORDINATES (M) X1	Y1	X2	Y2	TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. 1	18	20	66	49	AG	134	63.0	0.0	9.0
B. 2	18	15	66	44	AG	134	63.0	0.0	9.0
C. 3	63	0	63	44	AG	213	63.0	0.0	12.0
D. 4	63	44	63	69	AG	160	63.0	0.0	12.0
E. 5	69	0	69	44	AG	370	63.0	0.0	12.0
F. 6	69	44	69	69	AG	585	63.0	0.0	12.0
G. 7	66	63	132	63	AG	395	63.0	0.0	18.0
H. 8	66	67	132	67	AG	469	63.0	0.0	18.0
I. 9	66	72	132	72	AG	379	63.0	0.0	18.0
J. 10	66	76	132	76	AG	376	63.0	0.0	18.0
K. 11	69	69	102	114	AG	187	63.0	0.0	9.0
L. 12	63	69	96	114	AG	234	63.0	0.0	9.0
M. 13	0	76	66	76	AG	400	63.0	0.0	18.0
N. 14	0	72	66	72	AG	324	63.0	0.0	18.0
O. 15	0	67	66	67	AG	448	63.0	0.0	18.0
P. 16	0	63	66	63	AG	381	63.0	0.0	18.0

3. Receptor Coordinates

	X	Y	Z
RECEPTOR 1	72	36	1.3
RECEPTOR 2	72	160	1.3
RECEPTOR 3	78	48	1.3
RECEPTOR 4	84	51	1.3
RECEPTOR 5	90	54	1.3
RECEPTOR 6	96	54	1.3
RECEPTOR 7	102	54	1.3
RECEPTOR 8	108	54	1.3
RECEPTOR 9	108	81	1.3
RECEPTOR 10	102	81	1.3
RECEPTOR 11	84	81	1.3
RECEPTOR 12	66	81	1.3
RECEPTOR 13	60	81	1.3
RECEPTOR 14	54	81	1.3
RECEPTOR 15	42	81	1.3
RECEPTOR 16	42	60	1.3
RECEPTOR 17	48	60	1.3
RECEPTOR 18	54	60	1.3
RECEPTOR 19	60	60	1.3
RECEPTOR 20	60	54	1.3

MODEL RESULTS - CARBON MONOXIDE
CARPINTERIA/MILPAS
WITH SALSIPUEDES AND GARDEN EXTENSIONS

RECEPTOR	PRED COCN (PPM)	CONC/LINK (PPM) A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
RECPT 1	8.4	0.0	0.0	0.0	0.0	0.3	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 2	8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 3	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.3	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 4	9.6	0.0	0.0	0.0	0.0	0.0	0.0	0.9	0.5	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 5	10.4	0.0	0.0	0.0	0.0	0.0	0.0	1.4	0.8	0.2	0.1	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 6	10.0	0.0	0.0	0.0	0.0	0.0	0.0	1.2	0.7	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 7	9.7	0.0	0.0	0.0	0.0	0.0	0.0	1.1	0.5	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 8	9.4	0.0	0.0	0.0	0.0	0.0	0.0	1.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 9	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.8	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 10	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.9	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 11	9.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	1.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 12	10.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	1.0	0.5	0.9	0.0	0.0	0.0	0.0
RECPT 13	10.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.8	0.4	0.6	0.3	0.0	0.0	0.0
RECPT 14	10.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.5	0.3	0.5	0.6	0.1	0.0	0.0
RECPT 15	9.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.2	0.2	0.3	0.9	0.1	0.0	0.0
RECPT 16	15.2	0.0	0.0	0.0	0.2	0.0	0.5	0.8	1.1	0.9	0.7	0.1	0.1	0.1	0.4	1.3	1.1
RECPT 17	15.2	0.0	0.0	0.0	0.3	0.0	0.7	1.0	1.3	1.0	0.7	0.1	0.0	0.0	0.2	1.0	0.9
RECPT 18	15.4	0.0	0.0	0.0	0.4	0.0	1.0	1.2	1.6	1.1	0.7	0.0	0.0	0.0	0.1	0.7	0.6
RECPT 19	15.6	0.0	0.0	0.0	0.4	0.0	1.4	1.5	1.9	1.1	0.7	0.0	0.0	0.0	0.0	0.4	0.3
RECPT 20	17.1	0.0	0.0	0.0	0.4	0.0	1.4	1.5	1.2	0.5	0.3	0.0	0.0	0.0	0.0	0.0	3.9

START TIME = 15:44:09 FINISH TIME = 15:44:16

REPORT FOR FILE : NO- CARP/MILP

1. Site Variables

U=	1.0	M/S	ZO=	321.0	CM
BRG=	78.0	DEGREES	VD=	0.0	CM/S
CLASS=	D	STABILITY	VS=	0.0	CM/S
MIXH=	100.0	M	AMB=	0.0	PPM
SIGTH=	10.0	DEGREES	TEMP=	10.0	DEGREE (C)
O3 COCN=	0.050	PPM	NO COCN=	0.000	PPM
NO2 COCN=	0.000	PPM	REVERSE REACTION RATE=	0.0040000	1/SEC

2. Link Description

LINK DESCRIPTION	LINK COORDINATES (M) X1	Y1	X2	Y2	TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. 1	18	20	66	49	AG	134	2.2	0.0	9.0
B. 2	18	15	66	44	AG	134	2.2	0.0	9.0
C. 3	63	0	63	44	AG	213	2.2	0.0	12.0
D. 4	63	44	63	69	AG	160	2.2	0.0	12.0
E. 5	69	0	69	44	AG	370	2.2	0.0	12.0
F. 6	69	44	69	69	AG	585	2.2	0.0	12.0
G. 7	66	63	132	63	AG	395	2.2	0.0	18.0
H. 8	66	67	132	67	AG	469	2.2	0.0	18.0
I. 9	66	72	132	72	AG	379	2.2	0.0	18.0
J. 10	66	76	132	76	AG	376	2.2	0.0	18.0
K. 11	69	69	102	114	AG	187	2.2	0.0	9.0
L. 12	63	69	96	114	AG	234	2.2	0.0	9.0
M. 13	0	76	66	76	AG	400	2.2	0.0	18.0
N. 14	0	72	66	72	AG	324	2.2	0.0	18.0
O. 15	0	67	66	67	AG	448	2.2	0.0	18.0
P. 16	0	63	66	63	AG	381	2.2	0.0	18.0

3. Receptor Coordinates

	X	Y	Z
RECEPTOR 1	72	36	1.3
RECEPTOR 2	72	160	1.3
RECEPTOR 3	78	48	1.3
RECEPTOR 4	84	51	1.3
RECEPTOR 5	90	54	1.3
RECEPTOR 6	96	54	1.3
RECEPTOR 7	102	54	1.3
RECEPTOR 8	108	54	1.3
RECEPTOR 9	108	81	1.3
RECEPTOR 10	102	81	1.3
RECEPTOR 11	84	81	1.3
RECEPTOR 12	66	81	1.3
RECEPTOR 13	60	81	1.3
RECEPTOR 14	54	81	1.3
RECEPTOR 15	42	81	1.3
RECEPTOR 16	42	60	1.3
RECEPTOR 17	48	60	1.3
RECEPTOR 18	54	60	1.3
RECEPTOR 19	60	60	1.3
RECEPTOR 20	60	54	1.3

MODEL RESULTS - NITROGEN DIOXIDE
CARPINTERIA/MILPAS
WITH SALSIPUEDES AND GARDEN EXTENSIONS

RECEPTOR	PRED COCN (PPM)	CONC/LINK (PPM) A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
RECPT 1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 3	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 4	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 5	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 6	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 7	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 8	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 9	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 10	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 11	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 12	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 13	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 14	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 15	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 16	0.08	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.01	0.01
RECPT 17	0.07	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 18	0.07	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 19	0.07	0.00	0.00	0.00	0.00	0.00	0.01	0.02	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 20	0.06	0.00	0.00	0.00	0.00	0.00	0.01	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01

START TIME = 15:43:25 FINISH TIME = 15:43:32

REPORT FOR FILE : CO- MILP/INDIO MUERTO

1. Site Variables

U=	1.0 M/S	ZO=	321.0 CM
BRG=	81.0 DEGREES	VD=	0.0 CM/S
CLASS=	D STABILITY	VS=	0.0 CM/S
MIXH=	100.0 M	AMB=	8.0 PPM
SIGTH=	10.0 DEGREES	TEMP=	10.0 DEGREE (C)

2. Link Description

LINK DESCRIPTION	LINK COORDINATES (M) X1	Y1	X2	Y2	TYPE	VPH	EF (G/MI)	H (M)	W (M)
A 1	0	18	105	18	AG	946	63.0	0.0	18.0
B. 2	0	24	105	24	AG	348	63.0	0.0	18.0
C. 3	102	21	102	42	AG	9	63.0	0.0	18.0
D 4	108	21	108	42	AG	467	63.0	0.0	18.0
E 5	102	42	102	102	AG	6	63.0	0.0	18.0
F. 6	108	42	108	102	AG	6	63.0	0.0	18.0
G 7	105	95	168	99	AG	3	63.0	0.0	12.0
H 8	105	89	168	93	AG	461	63.0	0.0	12.0
I. 9	105	24	210	24	AG	428	63.0	0.0	18.0
J. 10	105	18	210	18	AG	568	63.0	0.0	18.0

3. Receptor Coordinates

	X	Y	Z
RECEPTOR 1	54	12	1.3
RECEPTOR 2	86	12	1.3
RECEPTOR 3	78	12	1.3
RECEPTOR 4	90	12	1.3
RECEPTOR 5	102	12	1.3
RECEPTOR 6	114	12	1.3
RECEPTOR 7	126	12	1.3
RECEPTOR 8	138	12	1.3
RECEPTOR 9	150	12	1.3
RECEPTOR 10	54	30	1.3
RECEPTOR 11	66	30	1.3
RECEPTOR 12	78	30	1.3
RECEPTOR 13	114	30	1.3
RECEPTOR 14	126	30	1.3
RECEPTOR 15	138	30	1.3
RECEPTOR 16	150	30	1.3
RECEPTOR 17	84	42	1.3
RECEPTOR 18	96	60	1.3
RECEPTOR 19	123	48	1.3
RECEPTOR 20	120	63	1.3

MODEL RESULTS - CARBON MONOXIDE
INDIO MUERTO/MILPAS
WITH SALSIPUEDES AND GARDEN EXTENSIONS

RECEPTOR	PRED COCN (PPM)	CONC/LINK (PPM) A	B	C	D	E	F	G	H	I	J
RECPT 1	14.7	4.2	0.7	0.0	0.2	0.0	0.0	0.0	0.0	0.8	0.9
RECPT 2	13.7	2.4	0.2	0.0	0.0	0.0	0.0	0.0	0.0	1.3	1.8
RECPT 3	14.1	3.0	0.4	0.0	0.1	0.0	0.0	0.0	0.0	1.1	1.5
RECPT 4	13.4	1.9	0.1	0.0	0.0	0.0	0.0	0.0	0.0	1.3	2.0
RECPT 5	12.8	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.4	2.9
RECPT 6	12.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.4	3.1
RECPT 7	12.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	3.0
RECPT 8	12.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.2	2.9
RECPT 9	11.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	2.7
RECPT 10	9.6	0.1	0.9	0.0	0.3	0.0	0.0	0.0	0.0	0.2	0.1
RECPT 11	9.6	0.0	0.9	0.0	0.4	0.0	0.0	0.0	0.0	0.3	0.1
RECPT 12	9.8	0.0	0.8	0.0	0.5	0.0	0.0	0.0	0.0	0.4	0.1
RECPT 13	9.6	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	1.3	0.1
RECPT 14	9.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.2	0.1
RECPT 15	9.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.2	0.1
RECPT 16	9.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.2	0.0
RECPT 17	8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 18	8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 19	8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 20	8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

START TIME = 15:44:54 FINISH TIME = 15:45:00

REPORT FOR FILE : NO- MILP/INDIO MUERTO

1. Site Variables

U=	1.0	M/S	ZO=	321.0	CM
BRG=	81.0	DEGREES	VD=	0.0	CM/S
CLASS=	D	STABILITY	VS=	0.0	CM/S
MIXH=	100.0	M	AMB=	0.0	PPM
SIGTH=	10.0	DEGREES	TEMP=	10.0	DEGREE (C)
O3 COCN=	0.050	PPM	NO COCN=	0.000	PPM
NO2 COCN=	0.000	PPM	REVERSE REACTION RATE=	0.0040000	1/SEC

2. Link Description

	LINK DESCRIPTION	LINK COORDINATES (M) X1	Y1	X2	Y2	TYPE	VPH	EF (G/MI)	H (M)	W (M)
A	1	0	18	105	18	AG	946	2.2	0.0	18.0
B	2	0	24	105	24	AG	348	2.2	0.0	18.0
C.	3	102	21	102	42	AG	9	2.2	0.0	18.0
D	4	108	21	108	42	AG	467	2.2	0.0	18.0
E	5	102	42	102	102	AG	6	2.2	0.0	18.0
F.	6	108	42	108	102	AG	6	2.2	0.0	18.0
G.	7	105	95	168	99	AG	3	2.2	0.0	12.0
H	8	105	89	168	93	AG	461	2.2	0.0	12.0
I.	9	105	24	210	24	AG	428	2.2	0.0	18.0
J.	10	105	18	210	18	AG	568	2.2	0.0	18.0

3. Receptor Coordinates

	X	Y	Z
RECEPTOR 1	54	12	1.3
ECEPTOR 2	86	12	1.3
ECEPTOR 3	78	12	1.3
RECEPTOR 4	90	12	1.3
ECEPTOR 5	102	12	1.3
ECEPTOR 6	114	12	1.3
RECEPTOR 7	126	12	1.3
RECEPTOR 8	138	12	1.3
ECEPTOR 9	150	12	1.3
RECEPTOR 10	54	30	1.3
RECEPTOR 11	66	30	1.3
ECEPTOR 12	78	30	1.3
ECEPTOR 13	114	30	1.3
RECEPTOR 14	126	30	1.3
ECEPTOR 15	138	30	1.3
ECEPTOR 16	150	30	1.3
RECEPTOR 17	84	42	1.3
RECEPTOR 18	96	60	1.3
ECEPTOR 19	123	48	1.3
RECEPTOR 20	120	63	1.3

MODEL RESULTS - NITROGEN DIOXIDE
INDIO MUERTO/MILPAS
WITH SALSIPUEDES AND GARDEN EXTENSIONS

RECEPTOR	PRED COCN (PPM)	CONC/LINK (PPM) A	B	C	D	E	F	G	H	I	J
RECPT 1	0.07	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
RECPT 2	0.06	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.02
RECPT 3	0.06	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.02
RECPT 4	0.05	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.03
RECPT 5	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.03
RECPT 6	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.03
RECPT 7	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.03
RECPT 8	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.03
RECPT 9	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.02
RECPT 10	0.02	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 11	0.02	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 12	0.02	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 13	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 14	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 15	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 16	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

START TIME = 15:45:39 FINISH TIME = 15:45:45

REPORT FOR FILE : CO - CARP/MILP W/O GARDEN EXTENSION

1. Site Variables

U=	1.0 M/S	ZO=	321.0 CM
BRG=	78.0 DEGREES	VD=	0.0 CM/S
CLASS=	D STABILITY	VS=	0.0 CM/S
MIXH=	100.0 M	AMB=	8.0 PPM
SIGTH=	10.0 DEGREES	TEMP=	10.0 DEGREE (C)

2. Link Description

LINK DESCRIPTION	LINK COORDINATES (M) X1	Y1	X2	Y2	TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. 1	18	20	66	49	AG	142	63.0	0.0	9.0
B. 2	18	15	66	44	AG	134	63.0	0.0	9.0
C. 3	63	0	63	44	AG	213	63.0	0.0	12.0
D. 4	63	44	63	69	AG	160	63.0	0.0	12.0
E. 5	69	0	69	44	AG	370	63.0	0.0	12.0
F. 6	69	44	69	69	AG	593	63.0	0.0	12.0
G. 7	66	63	132	63	AG	395	63.0	0.0	18.0
H. 8	66	67	132	67	AG	469	63.0	0.0	18.0
I. 9	66	72	132	72	AG	379	63.0	0.0	18.0
J. 10	66	76	132	76	AG	376	63.0	0.0	18.0
K. 11	69	69	102	114	AG	187	63.0	0.0	9.0
L. 12	63	69	96	114	AG	266	63.0	0.0	9.0
M. 13	0	76	66	76	AG	400	63.0	0.0	18.0
N. 14	0	72	66	72	AG	332	63.0	0.0	18.0
O. 15	0	67	66	67	AG	481	63.0	0.0	18.0
P. 16	0	63	66	63	AG	381	63.0	0.0	18.0

3. Receptor Coordinates

	X	Y	Z
RECEPTOR 1	72	36	1.3
RECEPTOR 2	72	160	1.3
RECEPTOR 3	78	48	1.3
RECEPTOR 4	84	51	1.3
RECEPTOR 5	90	54	1.3
RECEPTOR 6	96	54	1.3
RECEPTOR 7	102	54	1.3
RECEPTOR 8	108	54	1.3
RECEPTOR 9	108	81	1.3
RECEPTOR 10	102	81	1.3
RECEPTOR 11	84	81	1.3
RECEPTOR 12	66	81	1.3
RECEPTOR 13	60	81	1.3
RECEPTOR 14	54	81	1.3
RECEPTOR 15	42	81	1.3
RECEPTOR 16	42	60	1.3
RECEPTOR 17	48	60	1.3
RECEPTOR 18	54	60	1.3
RECEPTOR 19	60	60	1.3
RECEPTOR 20	60	54	1.3

MODEL RESULTS - CARBON MONOXIDE
CARPINTERIA/MILPAS
WITH SALSIPUEDES EXTENSION ONLY

RECEPTOR	PRED COCN (PPM)	CONC/LINK (PPM) A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
RECPT 1	8.4	0.0	0.0	0.0	0.0	0.3	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 2	8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 3	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.3	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 4	9.6	0.0	0.0	0.0	0.0	0.0	0.0	0.9	0.5	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 5	10.4	0.0	0.0	0.0	0.0	0.0	0.0	1.4	0.8	0.2	0.1	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 6	10.0	0.0	0.0	0.0	0.0	0.0	0.0	1.2	0.7	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 7	9.7	0.0	0.0	0.0	0.0	0.0	0.0	1.1	0.5	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 8	9.4	0.0	0.0	0.0	0.0	0.0	0.0	1.0	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 9	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.8	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 10	9.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.9	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 11	9.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	1.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 12	10.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	1.0	0.5	1.0	0.0	0.0	0.0	0.0
RECPT 13	10.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.8	0.4	0.7	0.3	0.0	0.0	0.0
RECPT 14	10.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.5	0.3	0.5	0.6	0.1	0.0	0.0
RECPT 15	9.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.2	0.2	0.4	0.9	0.1	0.0	0.0
RECPT 16	15.3	0.0	0.0	0.0	0.2	0.0	0.5	0.8	1.1	0.9	0.7	0.1	0.1	0.1	0.4	1.4	1.1
RECPT 17	15.3	0.0	0.0	0.0	0.3	0.0	0.7	1.0	1.3	1.0	0.7	0.1	0.0	0.0	0.2	1.1	0.9
RECPT 18	15.4	0.0	0.0	0.0	0.4	0.0	1.0	1.2	1.6	1.1	0.7	0.0	0.0	0.0	0.1	0.8	0.6
RECPT 19	15.7	0.0	0.0	0.0	0.4	0.0	1.4	1.5	1.9	1.1	0.7	0.0	0.0	0.0	0.0	0.4	0.3
RECPT 20	17.1	0.0	0.0	0.0	0.4	0.0	1.4	1.5	1.2	0.5	0.3	0.0	0.0	0.0	0.0	0.0	3.9

START TIME = 15:46:20 FINISH TIME = 15:46:27

REPORT FOR FILE : NO- CARP/MILP W/O GARDEN EXTENSION

1. Site Variables

U=	1.0 M/S	ZO=	321.0 CM
BRG=	78.0 DEGREES	VD=	0.0 CM/S
CLASS=	D STABILITY	VS=	0.0 CM/S
MIXH=	100.0 M	AMB=	0.0 PPM
SIGTH=	10.0 DEGREES	TEMP=	10.0 DEGREE (C)
O3 COCN=	0.050 PPM	NO COCN=	0.000 PPM
NO2 COCN=	0.000 PPM	REVERSE REACTION RATE=	0.0040000 1/SEC

2. Link Description

	LINK DESCRIPTION	LINK COORDINATES (M) X1	Y1	X2	Y2	TYPE	VPH	EF (G/MI)	H (M)	W (M)
A	1	18	20	66	49	AG	142	2.2	0.0	9.0
B	2	18	15	66	44	AG	134	2.2	0.0	9.0
C.	3	63	0	63	44	AG	213	2.2	0.0	12.0
D	4	63	44	63	69	AG	160	2.2	0.0	12.0
E	5	69	0	69	44	AG	370	2.2	0.0	12.0
F.	6	69	44	69	69	AG	593	2.2	0.0	12.0
G.	7	66	63	132	63	AG	395	2.2	0.0	18.0
H	8	66	67	132	67	AG	469	2.2	0.0	18.0
I.	9	66	72	132	72	AG	379	2.2	0.0	18.0
J.	10	66	76	132	76	AG	376	2.2	0.0	18.0
K	11	69	69	102	114	AG	187	2.2	0.0	9.0
L	12	63	69	96	114	AG	266	2.2	0.0	9.0
M.	13	0	76	66	76	AG	400	2.2	0.0	18.0
N	14	0	72	66	72	AG	332	2.2	0.0	18.0
O	15	0	67	66	67	AG	481	2.2	0.0	18.0
P.	16	0	63	66	63	AG	381	2.2	0.0	18.0

3. Receptor Coordinates

	X	Y	Z
ECEPTOR 1	72	36	1.3
RECEPTOR 2	72	160	1.3
RECEPTOR 3	78	48	1.3
ECEPTOR 4	84	51	1.3
RECEPTOR 5	90	54	1.3
RECEPTOR 6	96	54	1.3
ECEPTOR 7	102	54	1.3
ECEPTOR 8	108	54	1.3
RECEPTOR 9	108	81	1.3
ECEPTOR 10	102	81	1.3
ECEPTOR 11	84	81	1.3
RECEPTOR 12	66	81	1.3
RECEPTOR 13	60	81	1.3
ECEPTOR 14	54	81	1.3
RECEPTOR 15	42	81	1.3
RECEPTOR 16	42	60	1.3
ECEPTOR 17	48	60	1.3
ECEPTOR 18	54	60	1.3
RECEPTOR 19	60	60	1.3
ECEPTOR 20	60	54	1.3

MODEL RESULTS - NITROGEN DIOXIDE
CARPINTERIA/MILPAS
WITH SALSIPUEDES EXTENSION ONLY

RECEPTOR	PRED COCN (PPM)	CONC/LINK (PPM) A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
RECPT 1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 3	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 4	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 5	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 6	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 7	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 8	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 9	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 10	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 11	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 12	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 13	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.00
RECPT 14	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 15	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 16	0.08	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.01	0.01
RECPT 17	0.07	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 18	0.07	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 19	0.07	0.00	0.00	0.00	0.00	0.00	0.01	0.02	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 20	0.07	0.00	0.00	0.00	0.00	0.00	0.01	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01

START TIME = 15:46:59 FINISH TIME = 15:47:07

REPORT FOR FILE : CO - MILP/INDIO MUERTO W/O GARDEN EXTENSION

1. Site Variables

U=	1.0 M/S	ZO=	321.0 CM
BRG=	81.0 DEGREES	VD=	0.0 CM/S
CLASS=	D STABILITY	VS=	0.0 CM/S
MIXH=	100.0 M	AMB=	8.0 PPM
SIGTH=	10.0 DEGREES	TEMP=	10.0 DEGREE (C)

2. Link Description

LINK DESCRIPTION	LINK COORDINATES (M) X1	Y1	X2	Y2	TYPE	VPH	EF (G/MI)	H (M)	W (M)
A 1	0	18	105	18	AG	1000	63.0	0.0	18.0
B. 2	0	24	105	24	AG	380	63.0	0.0	18.0
C. 3	102	21	102	42	AG	9	63.0	0.0	18.0
D 4	108	21	108	42	AG	481	63.0	0.0	18.0
E 5	102	42	102	102	AG	6	63.0	0.0	18.0
F. 6	108	42	108	102	AG	6	63.0	0.0	18.0
G 7	105	95	168	99	AG	3	63.0	0.0	12.0
H 8	105	89	168	93	AG	475	63.0	0.0	12.0
I. 9	105	24	210	24	AG	474	63.0	0.0	18.0
J. 10	105	18	210	18	AG	622	63.0	0.0	18.0

3. Receptor Coordinates

	X	Y	Z
RECEPTOR 1	54	12	1.3
RECEPTOR 2	86	12	1.3
RECEPTOR 3	78	12	1.3
RECEPTOR 4	90	12	1.3
RECEPTOR 5	102	12	1.3
RECEPTOR 6	114	12	1.3
RECEPTOR 7	126	12	1.3
RECEPTOR 8	138	12	1.3
RECEPTOR 9	150	12	1.3
RECEPTOR 10	54	30	1.3
RECEPTOR 11	66	30	1.3
RECEPTOR 12	78	30	1.3
RECEPTOR 13	114	30	1.3
RECEPTOR 14	126	30	1.3
RECEPTOR 15	138	30	1.3
RECEPTOR 16	150	30	1.3
RECEPTOR 17	84	42	1.3
RECEPTOR 18	96	60	1.3
RECEPTOR 19	123	48	1.3
RECEPTOR 20	120	63	1.3

MODEL RESULTS - CARBON MONOXIDE
INDIO MUERTO/MILPAS
WITH SALSIPUEDES EXTENSION ONLY

RECEPTOR	PRED COCN (PPM)	CONC/LINK (PPM) A	B	C	D	E	F	G	H	I	J
RECPT 1	15.1	4.4	0.8	0.0	0.2	0.0	0.0	0.0	0.0	0.8	0.9
RECPT 2	14.1	2.5	0.2	0.0	0.0	0.0	0.0	0.0	0.0	1.4	2.0
RECPT 3	14.5	3.2	0.4	0.0	0.1	0.0	0.0	0.0	0.0	1.2	1.6
RECPT 4	13.8	2.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	1.5	2.2
RECPT 5	13.2	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.6	3.2
RECPT 6	12.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.5	3.4
RECPT 7	12.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.4	3.2
RECPT 8	12.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	3.1
RECPT 9	12.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.1	2.9
RECPT 10	9.7	0.1	1.0	0.0	0.3	0.0	0.0	0.0	0.0	0.2	0.1
RECPT 11	9.8	0.0	0.9	0.0	0.4	0.0	0.0	0.0	0.0	0.3	0.1
RECPT 12	10.0	0.0	0.8	0.0	0.6	0.0	0.0	0.0	0.0	0.4	0.1
RECPT 13	9.7	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	1.4	0.1
RECPT 14	9.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.4	0.1
RECPT 15	9.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	0.1
RECPT 16	9.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.3	0.1
RECPT 17	8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 18	8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 19	8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
RECPT 20	8.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

START TIME = 15:47:40 FINISH TIME = 15:47:46

REPORT FOR FILE : NO - MILP/INDIO MUERTO W/O GARDEN EXTENSION

1. Site Variables

U=	1.0	M/S	ZO=	321.0	CM
BRG=	81.0	DEGREES	VD=	0.0	CM/S
CLASS=	D	STABILITY	VS=	0.0	CM/S
MIXH=	100.0	M	AMB=	0.0	PPM
SIGTH=	10.0	DEGREES	TEMP=	10.0	DEGREE (C)
O3 COCN=	0.050	PPM	NO COCN=	0.000	PPM
NO2 COCN=	0.000	PPM	REVERSE REACTION RATE=	0.0040000	1/SEC

2. Link Description

LINK DESCRIPTION	LINK COORDINATES (M) X1	Y1	X2	Y2	TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. 1	0	18	105	18	AG	1000	2.2	0.0	18.0
B 2	0	24	105	24	AG	380	2.2	0.0	18.0
C 3	102	21	102	42	AG	9	2.2	0.0	18.0
D. 4	108	21	108	42	AG	481	2.2	0.0	18.0
E 5	102	42	102	102	AG	6	2.2	0.0	18.0
F 6	108	42	108	102	AG	6	2.2	0.0	18.0
G. 7	105	95	168	99	AG	3	2.2	0.0	12.0
H. 8	105	89	168	93	AG	475	2.2	0.0	12.0
I 9	105	24	210	24	AG	474	2.2	0.0	18.0
J. 10	105	18	210	18	AG	622	2.2	0.0	18.0

3. Receptor Coordinates

	X	Y	Z
RECEPTOR 1	54	12	1.3
RECEPTOR 2	86	12	1.3
ECEPTOR 3	78	12	1.3
ECEPTOR 4	90	12	1.3
RECEPTOR 5	102	12	1.3
ECEPTOR 6	114	12	1.3
ECEPTOR 7	126	12	1.3
RECEPTOR 8	138	12	1.3
RECEPTOR 9	150	12	1.3
ECEPTOR 10	54	30	1.3
RECEPTOR 11	66	30	1.3
RECEPTOR 12	78	30	1.3
ECEPTOR 13	114	30	1.3
ECEPTOR 14	126	30	1.3
RECEPTOR 15	138	30	1.3
ECEPTOR 16	150	30	1.3
ECEPTOR 17	84	42	1.3
RECEPTOR 18	96	60	1.3
RECEPTOR 19	123	48	1.3
ECEPTOR 20	120	63	1.3

MODEL RESULTS - NITROGEN DIOXIDE
INDIO MUERTO/MILPAS
WITH SALSIPUEDES EXTENSION ONLY

RECEPTOR	PRED CONC (PPM)	CONC/LINK (PPM) A	B	C	D	E	F	G	H	I	J
RECPT 1	0.07	0.03	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.02
RECPT 2	0.06	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.03
RECPT 3	0.06	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.02
RECPT 4	0.06	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.03
RECPT 5	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.03
RECPT 6	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.03
RECPT 7	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.03
RECPT 8	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.03
RECPT 9	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.02
RECPT 10	0.02	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 11	0.02	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 12	0.02	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 13	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 14	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 15	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 16	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.00
RECPT 17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RECPT 20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

START TIME = 15:48:13 FINISH TIME = 15:48:19

Appendix E

Noise and Vibration Information

WALKER, CELANO & ASSOCIATES
Consultants on Acoustics
2659 Townsgate Road, Suite 112
Westlake Village, CA 91361
805/497-1902
FAX 805/495-9933

ACOUSTICAL ANALYSIS REPORT

FOR

WATERFRONT PARK, HOTEL AND YOUTH HOSTEL

SANTA BARBARA, CALIFORNIA

May 10, 1993

Prepared for:

Interface Planning and Counseling Corporation
829 De La Vina Street, Suite 210
Santa Barbara, CA 93101

INTRODUCTION

The proposed Waterfront Park, Hotel and Youth Hostel project consists of an approximately 10 acre public park and a 150 room luxury hotel to be located on Cabrillo Boulevard between Santa Barbara and Salsipuedes Streets and a 75 bed hostel to be located on the southeasterly corner of Montecito and Chapala Streets. An acoustical analysis of the proposed project has been requested as a portion of the environmental review process.

CRITERIA

State Criteria:

The "California Noise Insulation Standards" contained in Part 2, Title 24, CCR of the State Building Code, Appendix 35 Sound Transmission Control place the following noise control requirements on new multiple residential structures including hotels, motels, dormitories, long-term care facilities, apartment houses:

1. Interior noise level in any habitable room, resulting from exterior noise sources must be limited to L_{dn} or CNEL 45 with doors and windows closed. If the exterior noise exposure exceeds L_{dn} or CNEL 60, an acoustical analysis is required demonstrating compliance with the prescribed interior noise limits. If windows and doors must be unopenable or closed to meet the criterion, alternate ventilation or other means must be incorporated to provide an acceptable indoor environment.

2. Walls and floor-ceiling assemblies separating dwelling units or guest rooms from each other and from public or service areas such as interior corridors, garages and mechanical spaces must provide airborne sound isolation meeting STC 50 if laboratory tested. Field tested assemblies must meet NIC 45 for occupied units or NNIC 45 for unoccupied units. Corridor doors, including their perimeter seals must meet STC 26. Corridor wall segments containing doors must have a composite NIC or NNIC 30 rating.

3. Floor-ceiling assemblies separating units must provide impact sound insulation meeting IIC 50 if laboratory tested. Field tested assemblies must meet FIIC 45 for both occupied and unoccupied units, with the exception that the measured impact sound pressure levels shall not be normalized to a standard amount of absorption in the receiving room. Impact sound insulation is not required over non-habitable rooms or spaces not designed to be occupied, such as garages, mechanical rooms or storage areas.

Santa Barbara City Criteria:

Land Use Compatibility Guidelines contained in Figure 2, page 1.19 and Table 3, page 2.24 of the City of Santa Barbara General Plan Noise Element are as follows:

Maximum allowable interior noise exposure, due to exterior noise sources, for Residential, Transient Lodging and other noise sensitive land use categories is L_{dn} (DNL) 45 dB.

Exterior noise exposure for "Transient Lodging" in the DNL 65 to 70 dB range is considered "Normally Acceptable" and noise in the DNL 70 to 80 dB range is considered "Normally Unacceptable" unless barriers are erected between the site and prominent noise sources to make the outdoor environment tolerable.

Exterior noise exposure for Playgrounds and Parks in the DNL 55 to 65 dB range is considered "Normally Acceptable" and noise in the DNL 65 to 75 dB range is considered "Normally Unacceptable".

Railroad Noise Criteria:

Relative to outdoor recreation areas, railroad noise requires special consideration. Periods of actual noise exposure are relatively infrequent and of short duration. In addition the DNL averaging procedure applies a 10 dB penalty to noise events occurring during nighttime hours in order to account for potential sleep interference, which is a consideration in the indoor living environment. However, sleep disturbance should not be a consideration in outdoor spaces such as parks, etc.

Vibration Criteria:

American National Standard S3.29-1983 "Guide to the evaluation of human exposure to vibration in buildings" establishes thresholds of perceptibility of vibration for the most sensitive individuals. These thresholds are referred to as base response curves, and depend upon the frequency of the vibration as well as the orientation of the body relative to the direction of the vibration. A "combined axis base response curve" combines the most sensitive elements of the vertical and lateral curves. Measured vibration may be compared to the combined axis base curve by filtering the signal with a simple low pass network with a 5.6 Hz corner frequency (referred to henceforth as ANSI S3.29 weighting). According to ANSI S3.29, the minimum perceptibility threshold for vibration weighted in this manner is 0.0036 (3.60E-03) meter per second squared (rms).

For vibrations which exceed this threshold, acceptability is based on a number of factors, including duration, repetition rate, activity at the reception points and individual sensitivity. For example, in residential settings, vibration amplitudes 1.4 to 4.0 times the base values are generally considered acceptable during daytime hours, while at night, the acceptability threshold would be 1.0 to 1.4 times the base value.

Excessive vibration can result in structural damage to exposed buildings. The general criterion limit for building damage risk is 0.5-1.0 m/sec^2 (ref. Tonndorf et al "Criteria of Noise and Vibration Exposure," *Handbook of Noise Control, 2nd Edition*, C. Harris, ed. p. 18-11).

PROJECT DESCRIPTION

WATERFRONT PARK AND HOTEL

The proposed Waterfront Park and Hotel consists of an approximately 10 acre public park and a 150 room luxury hotel complex with associated parking. The site is bounded on the north by the Southern Pacific Transportation Company railroad right-of-way, on the east by Salsipuedes Street, on the south by Cabrillo Boulevard, and on the west by Santa Barbara Street.

The westerly three-quarters of the site will be a public park. Park facilities will include wetlands, a lagoon, a carousel, a children's play area, fountains concession operations and various recreational opportunities. An automobile parking area will be located on the northwesterly portion of the site with access from Santa Barbara Street, just south of the railroad tracks.

The hotel is to be located on the easterly end of the site. The northerly face of the structure is to be located approximately 25 ft southerly of the northerly property line. This 25 ft setback will be utilized as a fire access road. The hotel will have a central courtyard that will be shielded from the railroad by the northerly wing of the building. The swimming pool and primary outdoor recreational facilities will located within this courtyard.

YOUTH HOSTEL

The proposed Youth Hostel is an approximately 9700 sqft 2 story building to be located southeasterly of the intersection of Montecito Street and Chapala Street. The first floor will be set back 20 ft from the southerly curb of Montecito Street and the second floor will have a 30 ft setback. Highway 101 is located immediately northerly of Montecito Street. The Southern Pacific Transportation Company railroad right-of-way is located approximately 180 ft southerly of the site.

The proposed structure is roughly "U" shaped around a central landscaped courtyard with the opening facing towards the west. This courtyard will serve as the primary outdoor space for the project, and will be shielded from Highway 101 by the northerly wing of the building.

NOISE SETTING AND IMPACTS

COMPOSITE NOISE IMPACTS

It must be noted that noise levels from different sources add logarithmically, that is, 60 dB plus 60 dB equals 63 dB <u>not</u> 120 dB, and 55 dB plus 70 dB equals 70 dB <u>not</u> 125 dB. For example, if the unmitigated noise exposure at the rear of the site is DNL 68 dB due to the railroad and approximately DNL 60 dB due to Cabrillo Boulevard the composite would be approximately DNL 68.6 dB, i.e. less than a 1 dB difference. In addition for practical

purposes, one should note that when dealing with railroad noise as one of the sources, there are short periods of high noise level during a train passage, at which time the traffic noise would be essentially inaudible, and the rest of the time the tracks make no noise in the absence of a train and the only noise would be from the street.

When one looks at the project site after completion of the structures, the elevation facing away from one of the noise sources is shielded by the mass of the building itself and thus is only impacted by the noise source it faces. On elevations perpendicular to the noise sources, the mass of the building shields nominally half of each of the sources, thus reducing the noise of each source by approximately 3 dB.

WATERFRONT PARK & HOTEL

The primary sources of noise impacting the park and hotel site are freight and Amtrack passenger train operations on the SPRR right-of-way along the northerly border of the site, intermittent operation of heavy equipment and rock crushing at the building materials facility located northerly of the SPRR right-of-way opposite the location proposed for the hotel, and automobile and truck traffic on Cabrillo Boulevard (SR 225) to the south. In addition, noise from distant traffic on Highway 101 is audible at the site.

Field Measurements:

In order to characterize the existing noise environment at the project site and to serve as a basis for the subsequent analyses, acoustic measurements were conducted at several representative positions on the site.

Position 1 was located 65 ft southerly of the SPRR fence, approximately 25 ft westerly of the northerly end of Salsipuedes Street. The microphone was supported 13 ft above the ground to be representative of second floor window elevation.

Position 2 was located 25 ft southerly of the SPRR fence approximately 100 ft westerly of Salsipuedes Street, at the line of the northerly face of the proposed hotel building. The microphone was 13 ft above the ground to represent second floor window elevation.

Position 3 was located 85 ft northerly of the northerly curb of Cabrilo Boulevard approximately 100 ft westerly of Salsipuedes Street, at the line of the southerly face of the proposed hotel. The microphone was mounted on a 5 ft stand to be representative of standing head height.

The measurements at Positions 1 and 2 were taken with a Rion type NA-29E precision sound level meter octave band real time analyzer connected to a PC compatible Epson portable computer. The measurement microphone was fitted with B&K type UA 0237 foam windscreen. Typically, the measurement periods were 15 minutes total duration and consisted of a series of 900 consecutive 1 second time average (L_{eq1sec}) samples. Sample lengths for railroad noise varied depending on the actual duration of the operation. The analyzer simultaneously measured the overall A-weighted level and the A-weighted level in each of the octave bands over the range of 31 Hz to 8000 Hz. At the end of the 15 minute period, the analyzer calculated the statistical levels for the measurement period and all of the measured and calculated data were transferred to the computer for storage on magnetic disk.

The measurements at Position 3 were taken with a Larson-Davis Laboratories type 3100 1/3-octave integrating real time analyzer connected to a Hewlett Packard type 9816S computer. The measurement microphone was fitted with B&K type UA 0237 foam windscreen. The duration of the measurement samples was typically 15 minutes. For each of the measurements, the analyzer computed the L_{eq} 1/3 octave spectrum and overall A-weighted and un-weighted noise levels. Concurrently, the analyzer transferred the instantaneous A-weighted noise levels at a rate of 10 samples per second to the computer for storage on magnetic disk. At the end of the sample period, the L_{eq} 1/3 octave spectrum, A-weighted and un-weighted overall noise levels and a date/time stamp were read into the computer and stored on magnetic disk. From these disk records, graphic level versus time recordings and statistical analyses of the measured samples were produced in the laboratory.

Prior to beginning each series of measurements the overall calibration of each of the systems was checked with a Bruel & Kjaer type 4230 acoustic calibrator. The measurement results are summarized in Table 1, below and copies of the computer output data sheets are appended to this report. Note that although the measurement data in the table is quoted, for illustration, to

an apparent precision of 0.1 dB, which is the resolution of the digital displays on the analyzers, the absolute precision of the calibration is ± 0.4 dB.

Date	Start Time	Posn	A-weighted Noise Level - dB			Railroad Operations				
			Intrusive L_1	Ambient $L_{eq15min}$	Background L_{90}	Type	Max L_{max}	Avg L_{eq}	Dur sec	SEL
12-8	12:22	1				Pas n/b	81.8	69.8	100	89.8
12-10	20:42	1				Siding	86.0	68.0	950	97.8
12-22	11:27	2	76.3	73.5	71.8					
12-22	11:51	2	58.9	56.2	54.4					
12-22	11:56	3	66.3	60.4	52.9					
12-22	12:49	3	66.9	61.4	55.4					
12-22	12:52	2				Pas n/b	90.5	81.4	30	96.2
12-22	13:02	2				Pas n/b	81.6	76.3	30	91.1
						Siding	84.6	76.9	90	96.4
12:22	13:35	3	68.2	62.5	56.7					

Table 1
Summary of Noise Levels
Measured at Park and Hotel Site

Upon examination of the data in Table 1, it can be seen that the existing ambient noise levels on the project site vary widely. The average daytime noise levels at the northerly border of the site range from approximately 56 dB in the absence of any identifiable noise sources to upwards of 80 dB during train passages. Maximum noise levels in excess of 90 dB were observed due to trains.

Railroad Operations:

Average railroad operations in the vicinity of the site, as recently reported by a representative of Southern Pacific Transportation Company (Mr. Doug Wubbena), were as follows: 6 unscheduled freight trains, and 6 Amtack passenger operations southerly of the Santa Barbara station daily. The scheduled Amtrack operations consist of the Coast Starlight once northbound and once southbound, and the San Diegan twice northbound and twice southbound. In addition to these through operations, both San

Diegans are parked on a siding immediately northerly of the site for service during the layover between the termination of the northbound operation and the beginning of the southbound run.

DNL contour locations were computed for the operation activity described above. Time of day distribution for the non-scheduled freight operations was assumed to be 3 each during the day (7:00 a.m. to 10:00 p.m.) and night (10:00 p.m. to 7:00 a.m.) hours. The two Amtrak Coast Starlight operations occur during early afternoon (12:30 p.m. arrive from south, and 4:35 p.m. depart to south). Both San Diegan departures occur during daytime hours (7:45 a.m. and 3:15 p.m.), one arrival occurs approximately noon and the other arrives at approximately 10:35 p.m. at night. The first San Diegan service layover occurs between approximately 1:00 and 3:00 p.m. and the second between approximately 11:00 p.m. and 7:00 a.m. the following morning. Thus, two service operations occur during day hours and two during night hours. This assumed distribution results in a DNL weighted total of 48 operations daily on the through tracks (8 during the day and 4 at night that are weighted by a factor of 10) and 22 operations daily (2 day and 2 at night weighted by 10) on the siding. A weighted SEL value of 98.8 dB was utilized which was based on the railroad operation noise levels measured at both this site and the Youth Hostel site. The results of the calculations are summarized in Table 2, below.

DNL dB	Distance - ft
70	Within r-o-w
65	28
60	115
55	310
50	730

Table 2
Railroad Noise Contour Locations for Waterfront Park and Hotel Site
Relative to SPRR Right-of-Way Fence Line

It should be noted, that these calculations assume a "bare site" condition and "infinite" length unshielded tracks. They do not include shielding that would be provided by intervening development on adjacent parcels, shielding of a train passage by another train parked on the siding or sound reflection by structures on the opposite side of the tracks. It should also be noted that

the 1 ft resolution tabulated is a computational artifact that has been retained for illustrative purposes. The actual railroad noise exposure at any given point could easily be 1 or 2 dB higher (or lower) than tabulated, due to the assumptions regarding number and time of day distribution of freight train operations. For example, if the assumed distribution of freight operations were changed from 3 each during the day and night to 2 day and 4 night, the DNL weighted train count would increase from 70 to 79 per day, resulting in a noise increase of approximately 0.5 dB. As another example, if 2 additional freight operations were to occur during night hours, the DNL weighted count would increase to 90 per day, which would result in a 1 dB increase in railroad noise exposure.

The northerly face of the proposed hotel will be located approximately 25 ft southerly of the SPRR right-of-way fence. Thus, the exterior railroad noise exposure along the rear of the building would be approximately DNL 65 dB. This noise exposure would fall in the DNL 65-70 dB "Normally Acceptable" range for Transient Lodging, thus railroad noise would not be a significant impact at the proposed hotel.

In the park areas immediately along the northerly border of the site, the railroad noise exposure would be approximately DNL 68 dB. This noise exposure would fall in the DNL 65-75 dB "Normally Unacceptable" range for Playgrounds and Parks. Thus, railroad noise would be a significant impact at the park, and noise mitigation measures in the form of an acoustic barrier along the railroad-right-of-way would be necessary.

It is not likely that the proposal to add two additional Amtrak San Diegan operations would result in a significant change in the overall average railroad noise environment. Any additional operations would most likely occur during daytime hours, since the present operational schedule includes a late night arrival and subsequent early morning departure. Two additional trains would result in four additional through operations and possibly four additional service operations on the siding. Therefore, given the present DNL weighted daily train count of 70, the 8 potential additional operations would result in a DNL weighted total of 78 operations per day. This increase would result in a 0.5 dB increase in the DNL average railroad noise level, an essentially imperceptible change. [For normal listeners, changes of 1 dB or less are rarely discernable, a 3 dB change is clearly noticeable, and a change of 10 dB is necessary for the difference to be judged to be half or twice as loud.] However, service operations on two additional trains would essentially

double the activity on the siding, and could result in a noticeable change in the average daytime railroad noise at the rear face of the hotel.

Building Materials Facility Operation:

Two consecutive measurement samples taken on the morning of December 22, 1992 demonstrate the noise impact of the rock crushing activity on the northeasterly portion of the Hotel site. The rock crusher operated continuously during the 11:27-11:42 sample, resulting in an average noise level of $L_{eq15min}$ 73.5 dB 25 ft southerly of the SPRR fence, the location proposed for the northerly face of the hotel. During the entire 11:51-12:06 sample the equipment was off, and the average noise level was $L_{eq15min}$ 56.2 dB. It is our understanding that operation of this facility is on an as needed basis and only during daytime hours. It operated approximately half of the time during the measurements on December 22, but was not operating during the December 8 measurements.

If it is assumed that the rock crusher operates continuously for a full eight hour shift during the daytime, the resulting noise exposure due to the rock crusher operation alone would be approximately DNL 70 dB. This would fall right at the upper limit of the Normally Acceptable range for Transient Lodging. If operation four hours a day is assumed, the result would be approximately DNL 68 dB. Thus, the rock crusher operation could be a marginal to significant noise impact at the rear of the Hotel property, depending on actual duration of operation.

Traffic Noise:

Traffic count data was obtained from the project traffic analysis prepared by Omni-Means. On the westerly side of the intersection of Cabrillo Boulevard and Salsipuedes Street the existing p.m. peak hour traffic was reported to be 1522 on Friday and 2122 on Sunday. Future p.m. peak hour traffic conditions were reported to be 1660 on Friday and 2288 on Sunday with the existing street configurations. If the Salsipuedes Street and Garden Street extensions are constructed these future projections increase to 1758 and 2366 respectively. Typically, p.m. peak hour traffic is approximately 8% to 10% of average daily traffic (ADT). On this basis, the estimated present daily traffic on Cabrillo in front of the project site would be approximately 19,000

to 21,000 and the projected future traffic would be in the 22,000 to 24,000 range.

These data were used as input to a computerized traffic noise prediction model based on the FHWA RD-77-108 Highway Noise Prediction Model. Present traffic was assumed to be 21,000 ADT and future traffic was assumed to be 24,000 ADT. Average speed was assumed to be 40 mph and truck mix was assumed to be 4% of ADT. The computer model incorporates the reference noise emission levels contained in Caltrans Report FHWA/CA/TL-84/13 and utilizes a distance attenuation calculation procedure that incorporates atmospheric absorption as well as wave spreading effects. The calculated DNL contour locations for conditions are summarized in Table 3, below.

DNL dB	Traffic Condition	
	Present (21,000 ADT)	Year 2010 (24,000 ADT)
75	25	26
70	52	58
65	129	143
60	313	346
55	675	730
50	1232	1311

Table 3
Calculated A-weighted Traffic Noise Contour Locations
Relative to the Centerline of Cabrillo Boulevard

It should be noted, that these calculations assume a "bare site" condition and an "infinite" length road. They do not include shielding that would be provided by any intervening development on adjacent parcels. It should also be noted that the 1 ft resolution tabulated is a computational artifact that has been retained for illustrative purposes. The actual precision of the calculations is on the order of 10 to 20% of the distance due to the various assumptions used in the calculations. The calculations are based on projections for ADT and vehicle mix some time in the future, but utilize average vehicle noise emission levels based on acoustic measurement data taken some 7 to 9 years ago.

The southerly face of the proposed Hotel will be located approximately 110 ft from the center of Cabrillo Boulevard. At this distance the calculated exterior traffic noise exposure would be approximately DNL 65 dB for the present traffic and DNL 66 dB for the projected future traffic. These noise exposures fall in the "Normally Acceptable" range for "Transient Lodging" and thus would not be a significant noise impact.

Cabrillo Boulevard is approximately 55 to 60 ft wide, therefore the traffic noise exposure at the front of the park, immediately adjacent to the street would be approximately DNL 69 dB for the present traffic and DNL 70 dB for the projected future traffic. These noise exposures would exceed the DNL 65 dB "Normally Acceptable" limit for Parks by up to 5 dB, and could be a significant noise impact. The rear of the park ranges from approximately 200 to 400 ft from the center of Cabrillo Boulevard. Thus, unshielded traffic noise at the rear of the park would be in the DNL 59 to 63 dB range and would be considered "Normally Acceptable".

However, it should be noted that the existing Chase Palm Park, which is located on the opposite side of Cabrillo Boulevard from the proposed park site, is subject to essentially the same traffic noise exposure and is utilized by large numbers of people. Thus, in actuality the existing traffic noise levels are "Acceptable" to the general population.

Traffic noise contour locations were also computed for Salsipuedes Street for present traffic, future traffic with the existing street configuration and future traffic with the Salsipuedes Street and Garden Street extensions. Average daily traffic was assumed to be 3100, 5000 and 7500 for the three conditions respectively, based on the data in the Omni-Means traffic study. Average speed was assumed to be 35 mph and truck mix was assumed to be 3% of ADT. The results are summarized in Table 4, below.

DNL dB	Traffic Condition		
	Present (3,100 ADT)	Future (5,000 ADT)	Future with Extensions (7,500 ADT)
70	26	27	29
65	31	37	49
60	56	80	109
55	134	193	263
50	321	449	585

Table 4
Calculated A-weighted Traffic Noise Contour Locations
Relative to the Centerline of Salsipuedes Street

The easterly face of the proposed hotel is to be located approximately 65 ft from the center of Salsipuedes Street. At this distance the exterior traffic noise exposure would approximately DNL 60 dB for the present traffic and approximately DNL 62 to 64 dB for the future traffic without and with the street extensions. These noise exposures are below the DNL 70 dB "Normally Acceptable" limit and would not constitute a significant noise impact.

Highway 101 is located approximately 1200 ft northerly of the northerly border of the site. However, the site is shielded from the highway by existing development located between the railroad right-of-way and the highway. Thus, Highway 101 would not be a source of significant noise impact at this site.

YOUTH HOSTEL

The primary sources of noise impacting the Youth Hostel site are auto and truck traffic on Highway 101 immediately north of the site, and freight and Amtrack passenger train operations on the SPRR right of way to the south.

Field Measurements:

In order to characterize the existing noise environment at the project site and to serve as a basis for the subsequent analyses, acoustic measurements were conducted at various times of day at positions representative of the proposed location for the building.

Position 1 was located 30 ft southerly of the southerly curb of Montecito Street with the microphone mounted 13 ft above the ground to be representative of the windows on the second floor of the proposed building.

Position 2 was located 20 ft southerly of the southerly curb of Montecito Street with the microphone mounted 5 ft above the ground to be representative of the patio at the northerly side of the first floor.

The measurements utilized the Rion type NA-29E analyzer described above. The results of the measurements are summarized in Table 5, below, and copies of the computer printouts showing the time lines and statistical distribution of the overall A-weighted noise levels and the frequency spectra of the intrusive (L_1), ambient ($L_{eq15min}$) and background (L_{90}) noise levels are contained in Appendix B.

Date	Start Time	Posn	A-weighted Noise Level - dB			Railroad Operations				
			Intrusive L_1	Ambient $L_{eq15min}$	Background L_{90}	Type	Max L_{max}	Avg L_{eq}	Dur sec	SEL
12-8	10:02	1	75.3	70.6	67.4					
12-8	10:24	2	74.7	69.1	64.9					
12-8	10:42	2	76.8	69.5	65.8	Frt n/b	79.3	73.3	100	93.3
12-8	11:01	1	74.0	69.9	67.1					
12-10	15:55	1	75.8	71.8	68.6	Frt s/b	85.8	76.4	70	94.9
12-10	16:13	2	74.8	69.8	66.7					
12-10	17:59	1	73.5	70.0	67.5					
12-10	18:20	2	71.2	67.3	64.2					

Table 5
Summary of Noise Levels
Measured at Youth Hostel Site

Upon examination of the data in Table 5 it can be seen that the existing noise environment at the front of the site is quite noisy, average noise levels were in the $L_{eq15min}$ 67 to 72 dB range. Since the DNL is typically approximately 2 dB higher than the daytime off-peak traffic average noise level, the estimated traffic noise exposure, based on the measurements, at the location proposed for the face of the building, is approximately DNL 72 to 74 dB.

Highway 101 Noise Modeling:

Present and projected future traffic count data for Highway 101 were obtained from Caltrans. Count stations nearest the project site are located at Las Positas, approximately 2.5 miles north of the site, and at Milpas, approximately 1.25 mile to the south. The available counts were taken prior to the completion of the Freeway construction project through downtown Santa Barbara. Traffic at Las Positas was reported to be 119,000 ADT with 6.7% total trucks split 2% medium and 4.7% heavy. At Milpas the traffic was 80,000 ADT with the same truck percentages. Caltrans projections for future traffic conditions in the project area are 20 year growth factors in the 1.43 to 1.64 range.

These data were used as input to a computerized traffic noise prediction model based on the FHWA RD-77-108 Highway Noise Prediction Model. The present traffic was assumed to be 100,000 ADT, approximately midway between the counts reported at the stations on either side of the site. Future traffic was assumed to be 160,000 ADT, a value towards the upper end of the projected growth range. Average speed was assumed to be 55 mph, the posted speed limit. The computer model incorporates the reference noise emission levels contained in Caltrans Report FHWA/CA/TL-84/13 and utilizes a distance attenuation calculation procedure that incorporates atmospheric absorption as well as wave spreading effects. The calculated DNL contour locations for conditions are summarized in Table 6, below.

DNL dB	Traffic Condition	
	Present (100,000 ADT)	Year 2010 (160,000 ADT)
80	80	107
75	172	243
70	396	543
65	810	1036
60	1424	1742
55	2287	2731

Table 6
Calculated A-weighted Traffic Noise Contour Locations
Relative to the Centerline of Highway 101

It should be noted, that these calculations assume a "bare site" condition and an "infinite" length road. They do not include shielding that would be provided by any intervening development on adjacent parcels or by the crash barrier along the southerly edge of the highway. It should also be noted that the 1 ft resolution tabulated is a computational artifact that has been retained for illustrative purposes. The actual precision of the calculations is on the order of 10 to 20% of the distance due to the various assumptions used in the calculations. The calculations are based on projections for ADT and vehicle mix some 20 years in the future, but utilize average vehicle noise emission levels based on acoustic measurement data taken some 7 to 9 years ago.

The northerly face of the proposed building will be located approximately 120 ft from the center of Highway 101. At this distance the calculated exterior highway noise exposure would be approximately DNL 77 dB for the present traffic and DNL 79 dB for the projected future traffic. As described above, the estimated exterior noise based on the measurement data is approximately DNL 74 dB. Thus the calculations agree reasonably with the measurement data when allowance is made for the shielding by the barrier at the edge of the highway and the limited length of road visible from the site.

This exterior noise exposure in the DNL 77 to 79 dB range exceeds the Normally Acceptable limit of DNL 70 dB for Transient Lodging by 7 dB for the present traffic and by 9 dB for the projected future traffic. This would

constitute a significant noise impact, and noise mitigation measures would be necessary to make outdoor living spaces tolerable. In addition, acoustically upgraded building envelope construction and closed windows will be necessary to ensure conformance with the DNL 45 dB interior noise limit.

Railroad Operations:

Average railroad operations in the vicinity of the project, as recently reported by a representative of Southern Pacific Transportation Company (Mr. Doug Wubbena), were as follows: 6 unscheduled freight trains and 2 Amtrak Coast Starlight passenger operations daily north of the station. In addition to these "through" operations, the Amtrack San Diegan enters the station from the south and subsequently departs to the south, a total of eight times daily. These operations consist of the two scheduled arrivals and departures with passengers and two additional arrivals from, and departures to, the service siding located adjacent to the Waterfront Park and Hotel site. However, noise due to these San Diegan operations does not significantly impact this site because of shielding by the station structure and other existing development located southeasterly of the site. Although the noise of these operations does not constitute a significant noise impact, noise due to these operations, especially warning horns, will be audible at the site. Similarly, the proposal to add two additional San Diegan trains would not significantly impact this site.

DNL contour locations were computed for the operation activity described above. Time of day distribution for the non-scheduled freight operations was assumed to be 3 each during the day (7:00 a.m. to 10:00 p.m.) and night (10:00 p.m. to 7:00 a.m.) hours. The two Amtrak Coast Starlight operations occur during the early afternoon. 12:30 p.m. depart to north, and 4:35 p.m. arrive from north. This assumed distribution results in a DNL weighted total of 35 operations daily (5 during the day and 3 at night weighted times 10). A weighted SEL value of 99.3 dB was utilized which was based on the railroad operation noise levels measured at both this site and the Waterfront Park and Hotel site. The results of the calculations are summarized in Table 7, below.

DNL dB	Distance - ft
65	54
60	170
55	537
50	1698

Table 7
Railroad Noise Contour Locations for Youth Hostel Site
Relative to Center of SPRR Right-of-Way

Note, these calculations assume that the train would be unshielded during its entire passage by the project site. In actuality there are several existing structures, including the Station located between the tracks and the site. Thus, these calculations are conservative and the actual railroad noise levels will be lower than tabulated. Also, as discussed above for the Hotel and Park site, the noise exposure at any given location could change by 1 or 2 dB with small changes in the number of nighttime freight operations. For example, 2 additional night freight operations would increase the DNL weighted total to 55 operations, resulting in a 2 dB increase in the railroad noise exposure.

The southerly face of the building will be located approximately 170 to 190 ft northerly of the center of the SPRR right-of-way. Thus, unshielded railroad noise exposure at the exterior of the building would be DNL 60 dB or lower, and railroad noise would not be a significant noise impact on the site.

ON SITE NOISE SOURCES

Mechanical Equipment:

Mechanical equipment for air conditioning (and refrigeration) systems for the proposed hotel could be a source of adverse noise impact on the existing adjacent hotel and/or the proposed park if it is not selected and located with proper consideration of the potential noise. Outdoor and rooftop mounted equipment such as cooling towers, air cooled chillers and refrigeration compressor systems can produce A-weighted noise levels in excess of 70 dB at distances of 30 to 50 ft. In addition, equipment noise often contains tonal components that can be clearly audible and annoying at levels that are below

the ambient noise at the receiving location. Complaints such as these could occur even though the equipment noise is not noticeable in the immediate vicinity of the building due to the shielding effect of the edge of the roof and/or the parapet.

Park Facilities and Human Activity:

Park facilities such as concession operations and carousels, and general activity of park patrons would all be sources of noise to some degree. However, these noises are "natural" to a park environment and thus would not constitute a significant noise impact within the park. If noise due to some specific activity in some location within the park is objectionable to some person, that person can move to another portion of the park. These noise sources could be noticeable outside the westerly face of the Hotel, however, they would be inconsequential in comparison to noise due to a train pass-by.

PROJECT GENERATED TRAFFIC

Traffic count data for Friday and Sunday P.M. peak hour for existing, cumulative growth and project related traffic were obtained from the project traffic analysis. Calculations were run for the three intersections most impacted by the project traffic to determine the impact of the project traffic on the overall average traffic noise. The results of these calculations are summarized in Table 8, below.

		Hourly Traffic Volume			Average Traffic Noise Increase - dB		
Intersection	Leg	Exist	Exist + Cumul	Ex+Cum +Proj	(Exist+Proj)/ Exist	(Exist+Cum)/ Exist	(Ex+Cum+Proj)/ (Exist+Cum)
		Friday PM Peak Hour					
Cabrillo & Santa Barbara	N	364	433	498	0.71	0.75	0.61
	E	1629	1681	1757	0.20	0.14	0.19
	S	84	85	85	0.00	0.05	0.00
	W	1665	1733	1768	0.09	0.17	0.09
Cabrillo& Salsipuedes	N	108	145	233	2.59	1.28	2.06
	E	1506	1533	1571	0.11	0.08	0.11
	W	1522	1584	1660	0.21	0.17	0.20
Montecito & Castillo	N	1697	1760	1766	0.02	0.16	0.01
	E	576	588	592	0.03	0.09	0.03
	S	768	816	821	0.03	0.26	0.03
	W	1255	1278	1281	0.01	0.08	0.01
		Sunday PM Peak Hour					
Cabrillo & Santa Barbara	N	612	684	778	0.62	0.48	0.56
	E	2057	2118	2223	0.22	0.13	0.21
	S	223	223	223	0.00	0.00	0.00
	W	2098	2177	2230	0.11	0.16	0.10
Cabrillo& Salsipuedes	N	249	286	405	1.70	0.60	1.51
	E	2101	2125	2179	0.11	0.05	0.11
	W	2122	2183	2288	0.21	0.12	0.20
Montecito & Castillo	N	1505	1548	1554	0.02	0.12	0.02
	E	483	493	497	0.04	0.09	0.04
	S	966	999	1007	0.04	0.15	0.03
	W	928	944	950	0.03	0.07	0.03

Table 8
Noise Impacts of Project Related Traffic

It should be noted that the 0.01 dB level of precision shown in Table 8 is a computational artifact, and was only retained for illustrative purposes and to demonstrate the insignificance of the majority of the increases in average traffic noise that would be due to project related traffic. For reference, an increase of approximately 1 dB is normally judged by an "average" listener to be just discernable, a 3 dB change is definitely noticeable, and a change in level of 10 dB is necessary for the difference to be judged to be half or twice as loud.

Upon examination of the data in Table 8 it can be seen that the effect of the project related traffic on the overall traffic noise in the vicinity of the project is minimal. With the exception of Salsipuedes Street, which serves as the entry point to the proposed hotel parking garage, the increases in average traffic noise due to the project would be less than 1 dB, and would be essentially unnoticeable. The 2 to 3 dB increase along Salsipuedes Street could be noticeable, however it would not be significant in view of the low traffic volumes involved, peak hour traffic volumes on the order of 200 to 400.

The proposed extensions of Salsipuedes Street and Garden Street would not change the project generated traffic volumes. However, some project related trips and some cumulative trips would be redistributed throughout the area. These changes would not result in a significant project related noise impact due to the small percentage of the total trips that are project related.

VIBRATION ANALYSIS

Ground vibration is a potential issue in two elements of the Waterfront Park and Hotel project:

Passing railroad trains at the north side of the project may produce sensible levels of floor vibration within the Hotel;

Insertion of foundation pilings for the proposed project structures may produce sensible levels of vibration in existing structures in the project area.

TRAIN VIBRATION

Field Measurements:

To assess the potential for train vibration impacts on the proposed Hotel, ground vibration levels were measured during passage of a freight train and two passenger trains on December 22, 1992. Bruel & Kjaer type 4370 accelerometers were staked into the ground at distances of 25 and 150 ft from the north property line fence. The accelerometer signals were recorded on a Panasonic type SV-3500 digital tape recorder. Subsequently in the

laboratory, the recorded signals were filtered by a weighting network corresponding to specifications set forth in ANSI S3.29 and plotted on a Bruel & Kjaer type 2306 graphic level recorder.

Results of the measurements are shown in the appended graphic level recordings. They are summarized in Table 9 below.

Event	Duration	m/s^2	Base Response Multiple
25 ft from Property Line:			
NB Freight Max.	5 sec.	7.78E-03	2.1
NB Freight Avg.	2 min.	3.10E-03	0.9
NB Amtrak Max.	2 sec.	13.1E-03	3.6
NB Amtrak Avg.	28 sec.	5.51E-03	1.5
NB San Diegan	24 sec.	3.90E-03	1.1
San Diegan Parking	16 sec.	5.51E-03	1.5
150 ft from Property Line:			
NB Freight Max.	2 sec	4.38E-03	1.2
NB Freight Avg.	2 min.	2.46E-03	0.7
NB Amtrak Max.	2 sec.	9.80E-03	2.7
NB Amtrak Avg.	28 sec.	3.10E-03	0.9
NB San Diegan	24 sec.	2.46E-03	0.7
San Diegan Parking	16 sec.	2.76E-03	0.8

Table 9
Summary of Train Vibration Measurements

At the 25 ft distance (location of the closest point on the proposed Hotel) train induced ground vibration generally falls in the borderline range relative to residential criteria established in ANSI S3.29. At the 150 ft distance, the vibration is generally within the acceptable range. The exception was for the locomotives of the northbound Coast Starlight, which produced vibration amplitudes 3.6 times the perception threshold at 25 ft and 2.7 times the threshold at 150 ft. It is probable that locomotives on large freight trains would produce similar ground vibration levels. However, since the durations of these brief "maxima" in the vibration levels are only two seconds or so, it is questionable whether they would be a serious source of annoyance in the hotel.

Impacts:

Since measured vibration levels occasionally exceed levels recommended by ANSI S3.29, there is a potential for significant impact of vibration on the hotel relative to guest perceptibility. The levels are not high enough to have a significant potential for causing building damage.

PILE INSERTION NOISE AND VIBRATION

Field Measurements:

Driven pile insertion technique results in short duration bursts of ground vibration which propagates outward at a rate which is dependent upon soil conditions. In order to determine approximate noise and vibration levels associated with pile driving operations, a measurement program was undertaken at a construction site in the Garden Grove area, using equipment of type similar to that which would be anticipated for use at the Waterfront Park and Hotel project. These measurements were conducted in September, 1989 by Walker, Celano & Associates as a part of a study for Community Memorial Hospital Medical Building in Ventura. The following discussion is adapted from that study.

Two pile drivers were operating at the measurement site, one 70 ft from the property line and the other 265 ft from the property line. Both were driving 40 ft long square concrete piles. Measurements were taken at the property line. The drivers were diesel powered units, with the power pack portion located behind the driving head, at an additional distance estimated at 30 ft.

The basic operation is as follows:

1. An auger drill on the front of the driver head tower is used to drill a pilot hole.

2. A cable hoist lifts the pile into position and drops it into the pilot hole. Steel reinforcing bars protruding from the top of the pile are inserted into holes in a steel cap of thickness approximately 5 ft. These two operations combined took 12-15 minutes per pile.

3. A large steel piston is repeatedly lifted by compressed air in a cylinder and allowed to drop onto the top of the steel cap, driving the pile

downward. The repetition period is approximately 1.4 seconds per impact, and it was observed to take 10-11 minutes to drive a pile through 20 ft.

Data acquisition was accomplished using a Bruel & Kjaer 4165 condenser microphone, a Bruel & Kjaer type 4370 delta-shear piezoelectric accelerometer, two Bruel & Kjaer type 2639 preamplifiers and a Bruel & Kjaer 2408 power supply, together with a Matsushita SV-100/PV-5000 dual channel digital tape recorder system (2-20,000 Hz frequency range). The accelerometer was bonded to the ground in a vertical orientation at the construction site property line. The microphone was mounted on a 5 ft stand and directed toward the pile driver (important only at high frequencies). The signals were recorded for during the driving of two piles by each of the two drivers. The measurement system was calibrated using a Bruel & Kjaer 4230 acoustic calibrator (certification 6/89), which provides a 94 dB 1 kHz tone at the microphone and a 10 mV 1 kHz reference signal for the accelerometer channel.

Data analysis was done using a Bruel & Kjaer type 2218 integrating impulse precision sound level meter, a Larson-Davis Laboratories 3100A integrating 1/3-octave real time analyzer, a Bruel & Kjaer type 2306 graphic level recorder and a Hewlett Packard 9816S computer with Infotek AD200 analog-to-digital converter.

Results - Acoustic Noise:

The following is a listing of various noise levels measured. All results are A-weighted sound level, using "fast" (1/8 sec) averaging time constant unless otherwise noted. "Impulse" sound level indicates that an ANSI standard impulse detector was used, having a 35 ms rise time and 1 second fall time to more accurately represent the noisiness of sounds of short duration. "Time Average" sound level is a true energy average, in this case over a time period of several minutes, long compared to the impact repetition period.

Auger Drilling and Power Pack	65 - 72 dB at 100 ft
Screech from Pile Hoist	77 - 82 dB at 70 ft

Pile Driving - Impulse	105 dB at 70 ft 94 dB at 265 ft
Pile Driving - Time Average	94 dB at 70 ft 82 dB at 265 ft

The 1/3-octave frequency spectra for Time Average and maximum instantaneous signal levels (upper curve) are shown in Figure 1. Only the 265 ft measurement data is shown. The 70 ft results are similar but approximately 12 dB higher. It may be noted that most of the acoustic energy is concentrated in the range 500-5,000 Hz. This frequency range is characterized by wavelengths 2 ft and smaller, making noise control with barriers a viable concept.

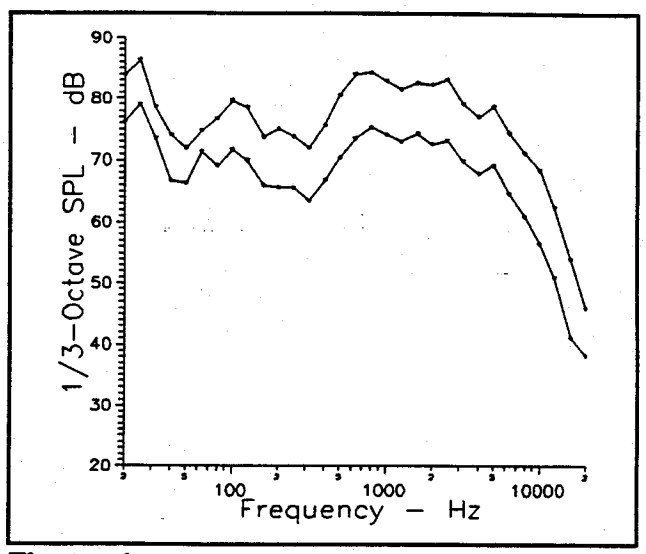


Figure 1 - 1/3 Octave Frequency Spectrum for Pile Driver at 265 ft

Noise Impacts:

It is clear from the table of noise measurement results that the only element of the pile driving noise which is distinct from typical construction equipment is the actual impact noise. Although the overall (Time Average) noise level of the impact noise is similar to levels quoted in EPA NTID 300.1 for tractors, graders and large trucks, the Impulse level is higher by approximately 13 dB (presuming a 3 dB increase from 70 to 50 ft, consistent with the 11-12 dB increase from 265 to 70 ft and the theoretical wave-spreading loss rate of 6 dB per distance doubling).

That construction of a large facility will produce significant short-term noise impacts on nearby noise-sensitive uses is a foregone conclusion. Mitigation measures in the EIR should give the option of reducing noise from pile-

driving equipment to levels which are similar to those produced by other heavy construction equipment.

Results - Ground Vibration:

Figure 2 shows the waveform of the ground vibration which results from a single pile driver impact at 70 ft distance. Numerous such impulses were recorded, with very little variation from one to the next. The peak acceleration was 0.030 G (0.3 m/s^2), which is distinctly sensible.

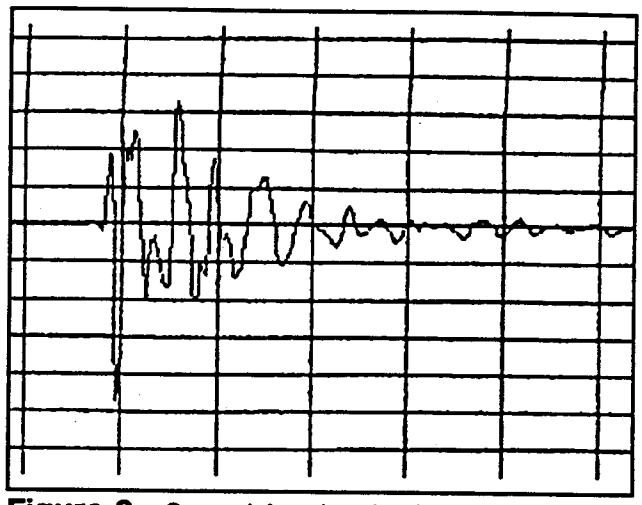


Figure 2 - Ground Acceleration Waveform at 70 ft. Vertical Lines 0.1 Second Spacing. Horizontal Lines 0.0064 G Spacing.

Figure 3 shows the waveform for the 265 ft distance, but with the sensitivity increased by a factor of 10. Note that the waveform has spread in time and the peak amplitude of 0.0032 G (0.03 m/s^2) is moved toward the trailing end of the wave. This is characteristic of surface waves, with propagation speeds which depend on frequency. At this distance, the ground vibration was just barely sensible.

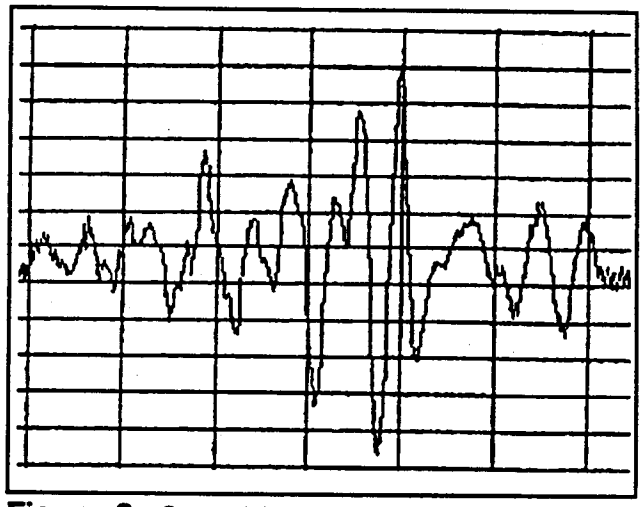


Figure 3 - Ground Acceleration Waveform at 265 ft. Vertical Lines 0.1 Second Spacing. Horizontal Lines 0.00064 G Spacing.

Figure 4 shows the maximum 1/3-octave frequency spectra for the ground acceleration measured at the 70 and 265 ft distances. The acceleration level is relative to 1 $\mu m/sec^2$. Also shown is the most sensitive vibration exposure criterion spectrum for hospital operating rooms (0.7 times the base response curve) from ANSI S3.29-1983. The peak frequency ranges in the measured spectra are 20-25 Hz. This is confirmed by a visual inspection of the vibration waveforms, which show typical periods of around 0.04 seconds.

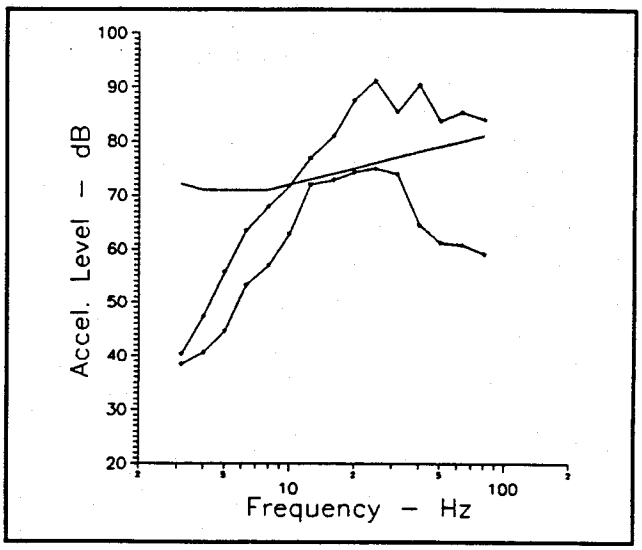


Figure 4 - Maximum Vibration Levels at 70 and 265 ft. Reference Curve is ANSI S3.29 Operating Room Criterion.

Vibration Impacts:

Review of the soils report for the project, prepared by Law/Crandall, Inc., indicates that the ground near the surface is a complex stratification of fill, silt and clay. It is not possible to assess the degree of similarity between this and the conditions at the Garden Grove test site. To determine an approximate vibration propagation characteristic for the project site, the measured vibration levels for the railroad at 25 ft and 150 ft distances from the tracks were compared. Although there is considerable scatter in the data, the result suggests an approximately 0.8 power of distance drop-off rate in the vibration amplitude. Since the measurement distances were small compared with the length of the trains, the drop-off rate for a concentrated excitation such as the pile driving could be expected to be in the range 1.5 to 1.8, similar to that measured at the Garden Grove site. Hence, the data taken at 265 ft in Garden Grove would be approximately representative of levels expected at similar distances at the Waterfront Park and Hotel site.

The existing hotel buildings nearest to the proposed project are located approximately 250 ft away. The measurements at the Garden Grove test site indicated that maximum vibration levels at 265 ft distance did not exceed the

ANSI acceptability criterion for operating rooms (0.7 times the base curve) and were just barely sensible to measurement personnel. Therefore it is unlikely that there would be any significant vibration impact at the existing hotel.

GREAT MEADOW PAVILION PUBLIC ADDRESS SYSTEM

A public address (PA) system is proposed for installation at the Great Meadow Pavilion. This facility will be located approximately 180 ft westerly of the westerly face of the proposed hotel. The anticipated usage of the PA system is for announcements, concerts by small musical groups, weddings, and other "low" to "moderate" sound level performances. High sound level rock band concerts are not anticipated. The primary audience area would be on the meadow westerly and southwesterly of the pavilion. Thus, the primary coverage area of the PA system would be oriented away from the location of the proposed hotel.

If it is assumed that there would be no "high level" sound reinforcement system operation, maximum sound levels of approximately 80 dB at the rear of the audience area, approximately 150 ft from the pavilion could be anticipated. Off-axis sound levels, i.e., sound in areas outside of the intended coverage area, produced by a directional sound system would be at least 10 dB lower than sound levels within the desired coverage area. Thus maximum sound levels of approximately 70 dB would be anticipated outside the hotel. Sound at this level would be audible at the hotel, however, it would be lower than the noise due to a train passage.

MITIGATION

WATERFRONT PARK & HOTEL

Railroad Noise:

An acoustic barrier will be necessary along the northerly border of the Park to reduce train noise exposure to DNL 65 dB or lower. Computerized barrier attenuation calculations were run for several representative distances from the tracks. On the basis of the train noise levels measured on the site, a

minimum barrier height of 8 ft relative to the tracks, assuming that the finished grade in the park is approximately level with the tracks, would reduce the railroad noise exposure in the park to approximately DNL 60 dB. If grading in the park results in a significant increase in elevation relative to the tracks, the wall height would have to be increased so that the top of the wall is no less than 7 ft above the finished grade on the park side in any area that would be easily accessible to park patrons.

No mitigation of railroad noise would be required in exterior areas of the hotel since the Courtyard will be shielded from the tracks by the northerly wing of the building. In order to conform with the DNL 45 dB interior noise requirement in the hotel guest rooms a minimum of 23 dB of exterior-to-interior noise reduction would be necessary. This degree of noise control can be readily achieved through the use of closed, well sealed, acoustically upgraded window assemblies. Fixed windows would not be necessary. Since the windows will have to be closed, at least part of the time in order to meet the DNL 45 dB interior noise criterion, alternative ventilation with cooling, if necessary to maintain a habitable interior environment, per applicable City and State Code requirements, will be required. Exact requirements for windows would depend on size, orientation, etc., and would be determined during preparation of construction drawings for the project.

Traffic Noise:

Outdoor noise exposure in the proposed park due to vehicular traffic on Cabrillo Boulevard will be in the DNL 60 to 70 dB range depending on location and distance from the street. Because noise levels in portions of the park less than 143 ft from the center of Cabrillo Boulevard would exceed the 65 dB "Normally Acceptable" threshold in the Noise Element, a significant, unavoidable noise impact would occur. However, as noted in the Traffic Noise Impacts section above, the existing Chase Palm Park on the southerly side of Cabrillo Boulevard is used by large numbers of people despite being subject to the same traffic noise as the proposed park. Thus, traffic noise in the park is not objectionable to the general public.

No mitigation of traffic noise would be required in exterior areas of the hotel since the Courtyard will be shielded from the street by the southerly wing of the building. In order to conform with the DNL 45 dB interior noise requirement in the hotel guest rooms a minimum of 21 dB of exterior-to-

interior noise reduction would be necessary. This degree of noise control can be readily achieved through the use of closed, well sealed, window assemblies at all windows not facing into the interior courtyard, and appropriate ventilation. As noted above under railroad noise mitigation, the exact details would be determined during preparation of construction drawings for the project.

Project Related Traffic:

There would be no significant noise impacts resulting from project related traffic. Therefore, no noise mitigation measures would be necessary.

On Site Stationary Noise Sources:

The design, selection and placement of mechanical equipment for the proposed hotel should include consideration of the potential impact on the adjacent park and existing hotel of noise produced by the equipment. Appropriate sound attenuating measures such as silencers and/or barriers should be provided where necessary at outdoor equipment such as cooling towers, air cooled condensers and refrigeration compressors/condenser units, and at the air intake and discharge openings for the building ventilation systems. Strict compliance with the property line noise limits contained in the City Noise Ordinance would minimize the potential for adverse impacts.

Train Vibration:

The brief nature of the potentially significant maximum vibrations suggests that they result from locomotives passing over a "rough spot" in the tracks near the measurement site. It may be possible to reduce substantially the train-induced ground vibration by eliminating any uneven joints in the tracks or other maintenance efforts.

Construction Vibration and Noise:

Run a test pile as early in the project as possible to verify assumptions relative to vibration propagation and building responses, and to determine remedial strategies in case of problems at the nearby buildings. All construction equipment should be provided with well maintained functional

mufflers to limit noise emissions. Adopt and adhere strictly to work scheduling requirements which will minimize noise and vibration intrusion at the existing hotel and other nearby noise sensitive uses. Construction activity should be restricted to the weekday daytime hours in order to minimize the potential for disturbances. Only emergency work should be allowed to occur outside of these hours.

Great Meadow Sound System:

Usage of the sound system should be limited to low or moderate sound level performances, i.e. maximum sound levels at the rear of the audience area should not exceed 80 dB. High level sound reinforcement, such as loud rock type shows should not be permitted. The sound systems should be designed with adequate directionality to confine the sound to the intended audience areas thus minimizing sound intrusion into the hotel area.

YOUTH HOSTEL

Highway 101 Traffic Noise:

The exterior noise exposure at the northerly face of the Youth Hostel will be approximately DNL 77 dB for the present traffic and DNL 79 dB for the projected future traffic. However, the primary outdoor activity area of the facility will be located in an enclosed central courtyard that will be shielded from the highway by the northerly wing of the building. Thus, no additional noise mitigation will be necessary for this space. If patio or balcony areas are to be located on the northerly face of the building, they should be considered non-essential spaces. If it is desired to reduce noise in these areas, barriers on the order of 9 ft high would be necessary depending on location and orientation. Exact details would be determined during the preparation od construction drawings.

In order to conform with the DNL 45 dB interior noise requirement in the hotel guest rooms a minimum of 32 dB of exterior-to-interior noise reduction would be necessary for the present traffic and 34 dB for the future traffic. This degree of noise control can be achieved through the use acoustically upgraded exterior wall constructions and closed, well sealed, acoustically rated window assemblies having an STC rating of 32-34. Fixed windows would not be necessary. Since the windows will have to be closed to meet

the DNL 45dB interior noise criterion, alternative ventilation with cooling, if necessary to maintain a habitable interior environment, per applicable City and State Code requirements, will be required. Exact requirements for windows would depend on size, orientation, etc., and would be determined during preparation of construction drawings for the project.

Railroad Noise:

No mitigation of exterior railroad noise would be necessary. The DNL 45 dB interior noise criterion can be met with the use of closed windows and ventilation as described above. Acoustically rated windows would not be necessary on the southerly face of the building since railroad noise exposure is below DNL 65 dB and "normal construction" typically achieves 20 dB of exterior-to-interior noise reduction with the windows closed.

APPENDIX A

ACOUSTICAL TERMINOLOGY DEFINITIONS

The following is not intended as a comprehensive glossary of acoustic terminology, however it will provide sufficient information to allow a better understanding of the technical language contained in this document.

- Decibel (dB) - A unit division on a logarithmic scale whose base is the tenth root of ten, used to represent ratios of quantities proportional to power. [In simple terms, if the power is multiplied by a factor of ten, then ten is added to the representation of the power on the decibel scale. If 0 dB represents 1 unit of power, 60 dB represents one million units, etc.]

- Sound Pressure Level (SPL - dB) - The ratio, in decibels, of the mean squared sound pressure to the square of the reference pressure, 20 micropascals.

- A-weighted Sound Level (SLA - dB) - Sound pressure level measured using the A-weighting network, a filter which discriminates against low and very high frequencies in a manner similar to the human hearing mechanism at moderate sound levels (ref. ANSI S1.4).

- Time Average Sound Level (L_{eqT} - dB) - The level, in decibels, of the mean squared sound pressure averaged over time period T. This is often referred to as the "equivalent sound level" and hence the "eq" subscript. The equivalence is to a sound of constant level which has the same total acoustic energy content.

- Day-Night Average Noise Level (DNL or L_{dn} - dB) - The long term average sound level, weighted as follows:

  a. Frequency response is filtered using the A-weighting network.

  b. Sounds occurring during the nighttime hours between 10 p.m. and 7 a.m. are weighted by 10 dB (equivalently, the number of noise events is multiplied by 10).

- Community Noise Equivalent Level (CNEL - dB) - The long term average sound level, weighted as follows:

  a. Frequency response is filtered using the A-weighting network.

  b. Sounds occurring during the evening hours between 7 p.m. and 10 p.m. are weighted by 5 dB (equivalently, the number of noise events is multiplied by 3.15)

  c. Sounds occurring during the nighttime hours between 10 p.m. and 7 a.m. are weighted by 10 dB (equivalently, the number of noise events is multiplied by 10).

- Percentile Exceeded Sound Level (L_{PE} - dB) - The sound level (usually A-weighted) which is exceeded PE percent of a specified time period.

- Sound Exposure Level (SEL - dB) - The logarithmic product of the average noise level (usually A-weighted) and the time duration. (It is <u>not</u> an actual measured noise level, but rather it is used in the computation of long term averages such as CNEL and DNL.)

- Octave Band Sound Pressure Level (dB) - The sound pressure level measured using a band-pass filter whose upper cutoff frequency is two times the lower cutoff frequency, and which is identified by the nominal geometric center frequency of the pass band.

- One-Third Octave Band Sound Pressure Level (dB) - The sound pressure level measured using a band-pass filter whose upper cutoff frequency is the cube root of two times the lower cutoff frequency, and which is identified by the nominal geometric center frequency of the pass band.

- Sound Spectrum - The representation of an acoustic signal in terms of its level versus frequency. The most common method for determining the sound spectrum is with an analyzer consisting of a series or bank of contiguous octave or 1/3 octave band filters and a bar-graph or numerical tabular display, known as a real-time analyzer

- Ambient Noise - The noise which results from the combination of all sources, near and far. The ambient noise level is expressed as L_{eqT}, L_{dn} or CNEL as judged appropriate to the situation.

- Background Noise - The steady noise level which characterizes a given environment in the absence of transient sources. The background noise is usually expressed as L_{90}, the noise level which is exceeded 90% of the specified time period.

- Intrusive Noise - Noise from an identifiable source which causes a discernable change in the existing acoustic environment. Noises can be intrusive by virtue of excessive overall level, or as the result of unusual spectral or temporal characteristics.

- Noise Contour - A line on a map which indicates locations of constant ambient sound level near or around known sources of noise. In practice, noise contours are often shown as calculated for the dominant sources of noise only.

- Noise Reduction (NR) - The difference in decibels, in a specified frequency band, between the average sound pressure levels in two enclosed spaces connected by one or more sound transmission paths due to a sound source in one of the spaces (ref. ASTM E336).

- Noise Isolation Class (NIC) - A single number rating of the sound isolation between two acoustically connected spaces derived from the measured noise reduction (ref. ASTM E336).

- Normalized Noise Isolation Class (NNIC) - A single number rating of the sound isolation between two acoustically connected spaces derived from the noise reduction after normalization to a receiving room reverberation time of 1/2 second (ref. ASTM E336).

- Sound Transmission Loss (TL) - The difference in decibels, in a specified frequency band, between the sound power incident on the "partition" and the sound power transmitted by the partition and radiated on the receiving side (ref. ASTM E90).

- Sound Transmission Class (STC) - A single number rating of the sound isolating capability of a building construction element with to respect speech, radio, television, and similar sources of noise in offices and dwellings. The rating is derived from the measurement of the sound transmission loss of the element over a series of 16 contiguous 1/3 octave bands centered from 125 Hz to 4000 Hz. The application of the STC rating to the isolation of sounds due to exterior noise sources such as motor vehicles or aircraft and sounds due to machinery, industrial noise sources, transformers, etc., is specifically excluded by the defining standard (ref. ASTM E413).

- Impact Insulation Class (IIC) - A single number rating of the ability of a floor-ceiling assembly to reduce the transmission of impact generated sounds such as footsteps into the space below (ref. ASTM E492).

APPENDIX B

ACOUSTIC MEASUREMENT DATA

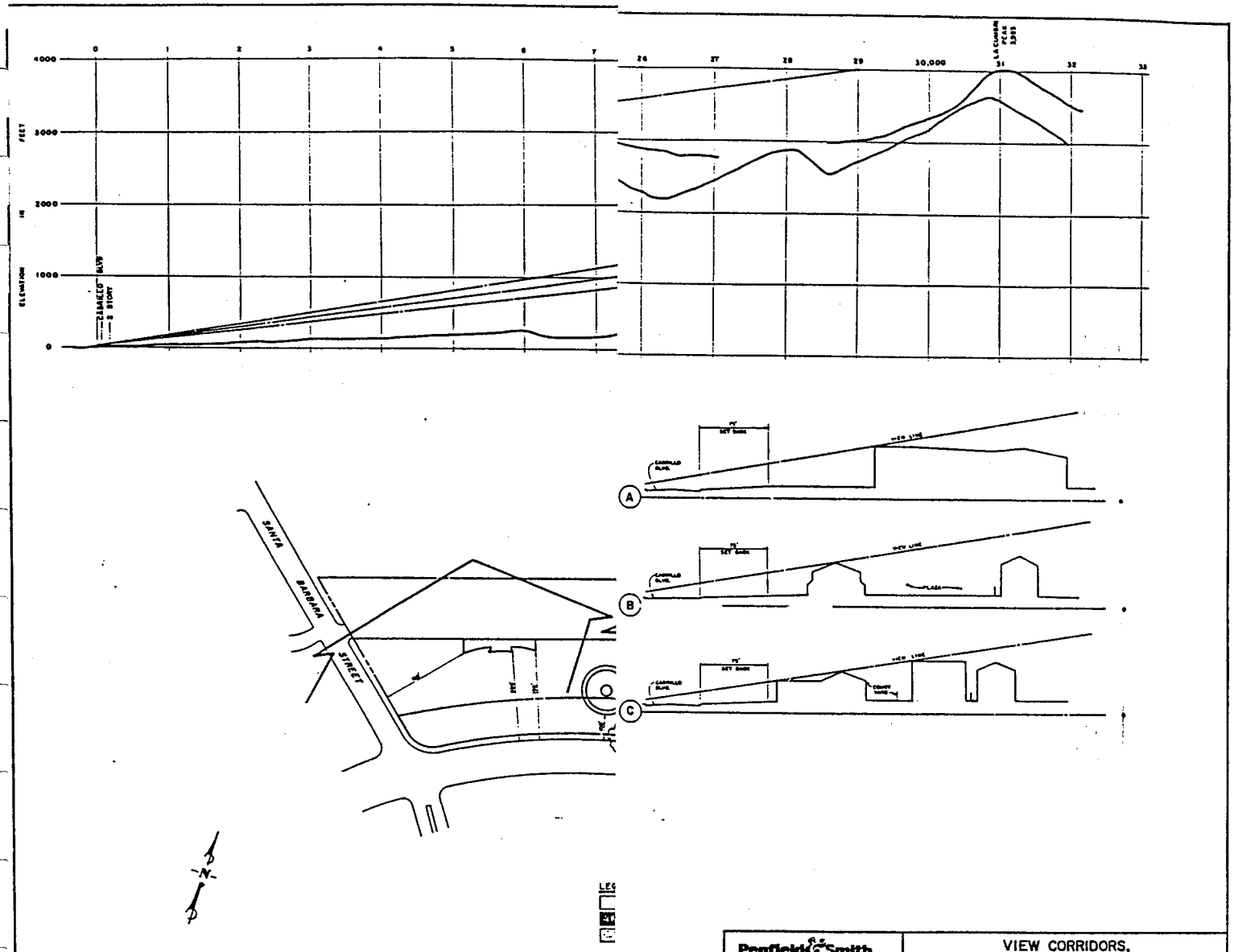
AND

COMPUTER CALCULATION PRINTOUT SHEETS

NOTE: ACOUSTIC MEASUREMENT DATA AND COMPUTER CALCULATION PRINTOUT SHEETS ARE AVAILABLE AT THE CITY'S COMMUNITY DEVELOPMENT DEPARTMENT.

Appendix F

Visuals/Aesthetics Information



Penfield & Smith
ENGINEERS • SURVEYORS

MICHAEL A. CACCESE R.C.E. 26,967
PROJECT ENGINEER (EXP 3-31-93)

VIEW CORRIDORS,
LINE OF SIGHT PROFILES
& HEIGHT - SETBACK RELATION

SANTA BARBARA WATERFRONT
PARK & HOTEL

SHT 5

Appendix G

Biological Resources Information

THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

INVASIVE PLANTS TO BE AVOIDED IN LANDSCAPING
January 1993

SCIENTIFIC NAME	COMMON NAME
Acacia decurrens	Green wattle
Acacia longifolia	Sydney wattle
Acacia melanoxylon	Black (blackwood) acacia
Acacia species	Acacias, mimosas, etc.
Ailanthus altissima	Tree of Heaven
Albizia lophantha (A. distachya)	Plume albizia
Allium triquetrum	Flowering onion
Amaranthus albus	Tumbleweed
Ammophila arenaria	European beach grass
Apium graveolens	Celery
Arundo donax	Giant reed
Atriplex semibaccata	Australian saltbush
Bellis perennis	English daisy
Bassia hyssopifolia	Fivehook
Bidens pilosa	Beggar ticks
Brassica nigra	Black mustard
Brassica geniculata	Summer mustard
Bromus mollis	Blando brome
Caesalpinia species	Bird of paradise bush
Cakile maritima	Sea rocket
Carduus pycnocephalus	Italian thistle
Cardaria draba	Hoary chess
Carpobrotus edulis	Hottentot fig (iceplant)
Casuarina species	Beefwood
Centaurea melitensis	Tocalote
Centaurea repens	Russian knapweed
Centaurea solstitialis	Yellow star thistle
Centranthus (=Kentranthus) ruber	Jupiter's beard, red valerian
Cirsium vulgare	Bull thistle
Conicosia pugioniformis	Narrow-leaved iceplant
Conium maculatum	Poison hemlock

Convolvulus arvensis	Bindweed
Cortaderia jubata	Pampas grass
Cotoneaster species	Cotoneaster
Cotula coronopifolia	Brass buttons
Cynara cardunculus	Cardoon, artichoke thistle
Cynodon dactylon	Bermuda (Devil's) grass
Cyperus rotundus	Purple nut grass
Cytisus monspessulanus	French or Mediterranean broom
Cytisus (=Spartium) scoparius	Scotch broom
Echium fastuosum	Pride of Madeira
Eichhornia crassipes	Water hyacinth
Ehrharta calycina	Veldt grass
Erodium species	Storkesbill
Eucalyptus camaldulensis	Red gum
Eucalyptus globulus	Blue gum
Eupatorium adenophorum (Ageratina adenophora)	Ageratina
Euphorbia lathyrus	Gopher purge, Caper spurge
Festuca ovian var. glauca	Blue fescue
Foeniculum vulgare	Sweet fennel
Gaura species	Gaura
Gazania species	Gazania
Hedera canariensis	Algerian ivy
Hedera helix	English ivy
Hypericum calycinum	Trailing St. Johnswort
Hypericum coris	St. Johnswort, Aaron's beard
Hypericum perforatum	Klamath weed
Iberis sempervirens	Evergreen candytuff
Lampranthus (Mesembryanthemum) spectabilis	Trailing ice plant
Lantana montevidensis	Lantana
Lathyrus latifolius	Everlasting pea
Lobularia maritima	Sweet alyssum
Lolium multiflorum	Italian ryegrass
Lolium perenne	English ryegrass
Limonium palustre	Marsh statice
Limonium sinuatum	Statice, sea lavender
Ludwigia uruguayensis	Uruguay water primrose
Malephora crocea	Malephora

Malva parviflora	Cheeseweed
Marrubium vulgare	White horehound
Mesembryanthemum crystallinum	Iceplant
Mesembryanthemum nodiflorum	Iceplant
Myoporum laetum	Myoporum
Myosotis latifolia	Forget-me-not
Nasturtium officinale (Rorippa nasturtium-aquaticum)	Water-cress
Nicotiana glauca	Tree tobacco
Oryzopsis miliacea	Smilo, rice grass
Osteospermum fruticosum	Trailing African daisy
Oxalis pes-caprae	Bermuda buttercup
Pennisetum clandestinum	Kikuyu grass
Pennisetum setaceum	Fountain grass
Pennisetum villosum	Feathertop grass
Phalaris aquatica	Harding grass
Phyla nodiflora	Mat grass, carpet grass
Picris echioides	Bristly ox tongue
Pittosporum undulatum	Pittosporum
Pittosporum sp.	Pittosporum
Pyracantha species	Pyracantha
Ricinus communis	Castor bean
Robinia pseudoacacia	Black locust
Rorippa nasturtium-aquaticum	Watercress
Rubus procerus	Himalayan blackberry
Rumex crispus	Curly dock
Salsola australis (S. iberica, S. kali)	Russian thistle
Schinus molle	Peruvian pepper
Schinus terebinthifolius	Brazilian pepper
Schismus barbatus	Abu Mashi, Arabian grass
Senecio mikanioides	German ivy
Silybum marianum	Milk thistle
Sonchus asper	Prickly sow thistle
Sonchus oleraceus	Common sow thistle
Sorghum halepense	Johnson grass
Spartium junceum	Spanish broom
Tamarix aphylla	Tamarisk, salt cedar
Tamarix ramossima	Tamarisk, salt cedar

Tetragonia tetragonioides	New Zealand spinach
Tropaeolum majus	Garden nasturtium
Vinca major	Periwinkle
Vinca minor	Dwarf periwinkle
Vulpia species	Foxtail fescue
Xanthium spinosum	Spiny clotbur
Zantedeschia aethiopica	Calla lily

WATERFRONT PARK
TREE SPECIES-EXISTING

BOTANICAL NAME	COMMON NAME	TOTAL	REMOVE	REMAIN	TRANS-PLANT
Acacia longifolia	Sydney golden wattle	5	3	2	
Acacia melanoxylon	Black acacia	9	7	2	
Callistemon viminalis	Weeping bottlebrush	1	1		
Cupressus macrocarpa	Monterey cypress	5		5	
Eucalyptus camaldulensis	Red gum eucalyptus	35	17	18	
Eucalyptus cornuta	Yate eucalyptus	65	19	46	
Eucalyptus ficifolia	Flower eucalyptus	2		2	
Eucalyptus globulus	Blue gum eucalyptus	6	3	3	
Hakea suaveolens	Sweet hakea	1	1		
Leptospermum laevigatum	Australian tea tree	2	1	1	
Melaleuca species	Melaleuca	4	3	1	
Myoporum laetum	Myoporum	38	37	1	
Olea europaea	European olive	1	1		
Phoenix canariensis and Phoenix dactylifera	Date palm	8	2		6
Pinus radiata	Monterey pine	1		1	
Pittosporum tobira	Tobira	2	2		
Dead trunk		1	1		
TOTALS		186	98	82	6

Source: George Girvin Associates, Landscape Architects, Conceptual Landscape Plan. 1992.

TABLE 1

SPECIES OBSERVED AUGUST 7, 1991

SCIENTIFIC NAME	COMMON NAME	COMMUNITY[1]	N/I[2]
Acacia longifolia	Sallow Wattle	ST	I
Acacia melanoxylon	Acacia	ST	I
Amaranthus powellii	Amaranth	RG	I
Ambrosia psilostachya	Western ragweed	BM	N
Apium graveolens	Celery	BM	N
Arundo donax	Giant reed	BM,RG	I
Atriplex patula hastata	Saltbush	BM	N
Atriplex semibaccata	Australian saltbush	BM,RG	I
Avena fatua	Wild oat	RG	I
Beta vulgaris	Chard	RG	I
Bidens pilosa	Beggar ticks	RG	I
Brassica nigra	Black mustard	RG	I
Bromus diandrus	Ripgutgrass	RG	I
Bromus willdenovii	Rescuegrass	RG	I
Callistemon viminalis	Bottlebrush	ST	I
Carpobrotus sp.	Iceplant	BM	I
Chenopodium ambrosioides	Mexican tea	RG	I
Chenopodium murale	Nettle-leaf goosefoot	RG	I
Convolvulus arvensis	bindweed	RG	I
Conyza canadensis	Horseweed	BM,RG	I
Cortaderia selloana	Pampas grass	BM	I
Cosmos bipinnatus	Cosmos	RG	I
Cotula coronopifolia	Brass buttons	BM	I
Cressa truxillensis		BM	N
Cupressus macrocarpa	Monterey cypress	ST	I
Cynodon dactylon	Bermudagrass	BM,RG	I
Cyperus eragrostis		BM	N
Eucalyptus camalduensis	River red gum	EW,ST	I
Eucalyptus cornuta		EW,ST	I
Eucalyptus ficifolia	Red flowering gum	EW,ST	I
Eucalyptus globulus	Blue gum	EW	I
Foeniculum vulgare	Fennel	BM,RG	I
Hakea sp.		ST	I
Heliotropium currasavicum	Heliotrope	BM	N
Hordeum murinum	Foxtail	RG	I
Lactuca serriola	Prickly lettuce	RG	I
Lamiaceae		RG	I
Lavatera cretica		RG	I
Leptospermum laevigatum	Coast tea tree	ST	I
Lolium multiflorum	Ryegrass	RG	I
Lonicera japonica	Honeysuckle	BM	I
Malacothrix saxatilis var. saxatilis	Cliff-aster	EW	N
Melaleuca armillaris	Bracelet honeymyrtle	ST	I
Melilotus albus	White sweet clover	RG	I
Melilotus indicus	Yellow sweet clover	RG	I
Mimosa sp.	Mimosa	BM	I

TABLE 1, continued

SCIENTIFIC NAME	COMMON NAME	COMMUNITY[1]	N/I[2]
Myoporum laetum	Myoporum	RG,ST	I
Nicotiana glauca	Tree tobacco	BM	I
Olea europaea	Olive	ST	I
Oryzopsis mileacea	Rice-grass	BM,RG	I
Paspalum dilatatum	Dallis grass	BM	I
Pennisetum villosum	Feathertop	RG	I
Phoenix canariensis	Palm	ST	I
Phoenix dactylifera	Palm	ST	I
Picris echioides	Ox-tongue	BM	I
Pinus radiata	Monterey pine	ST	I
Pittosporum tobira		ST	I
Plantago lanceolata	English plantain	BM,RG	I
Plantago major	Common plantain	BM	I
Polygonum aviculare	Knotweed	BM,RG	I
Polypogon monspeliensis	Rabbitsfoot grass	BM	I
Raphanus sativus	Wild radish	BM,RG	I
Ricinus communis	Castor bean	BM,RG	I
Rumex crispus	Curly dock	BM	I
Salix lasiolepis	Arroyo willow	EW	N
Salsola iberica	Russian thistle	RG	I
Scirpus californicus	California bulrush	BM	N
Scirpus robustus (= S. maritimus)	Prairie bulrush	BM	N
Sida leprosa	Alkali mallow	BM	N
Solanum douglasii	Douglas's nightshade	BM	N
Sonchus asper	Prickly sow thistle	RG	I
Stephanomeria virgata		BM	N
Tecomeria capensis	Cape honeysuckle	BM,ST	I
Tribulus terrestris	Puncture vine	RG	I
Tropaeolum majus	Nasturtium	BM	I
Xanthium strumarium	Cocklebur	BM,RG	I

1 BM - Coastal Brackish Marsh
EW - Eucalyptus Woodland
RG - Ruderal Grassland
ST - Street Tree

2 I - Introduced species
N - Native species

TREE MANAGEMENT PLAN

for

PARK PLAZA / WATERFRONT PARK

prepared by

Bill Spiewak - Certified Arborist

Purpose

The following report is a Tree Management Plan for the Park Plaza / Waterfront Park to be developed along Cabrillo Blvd between Santa Barbara Street and Salsipuedes Street in Santa Barbara. It is the objective of this Tree Management Plan to provide an accurate evaluation of the trees within this property along with recommendations for their preservation or removal. These trees have been individually evaluated and plotted by corresponding number on the included property map. General information on tree care, planting, tree species, tree protection and standards for tree pruning have also been presented in this report. As a Certified Arborist and a tree preservationist it is my moral obligation to recommend the preservation of as many trees as possible. However, in consideration of the increased liability due to public use of an improved park, I have made recommendations for removal of trees that would not have been made if the parcel was to remain undeveloped. I highly recommend a careful review of the recommended tree removals in the preliminary stage of park layout and design.

III. TREE SPECIES LIST

The following is a list of tree species presently growing on this property. Included are the Botanical names, common names and brief descriptions of important characteristics applicable to this project site. (partial descriptions are taken from the Sunset Western Garden Book).

1. Acacia longifolia - Sydney Golden Wattle: usually big, rounded billowy shrub. Very ast growing; very tolerant. Used as road screening against dust, headlights. Good soil binder near beach (winds make it prostrate). Short lived (20-30 years).

2. Acacia melanoxylon - Black Acacia: Slow growth to spreading, flat topped silhouette. Grow as single or multi-trunked tree or big shrub. Note: Black Acacias are not surviving the drought in Santa Barbara as well as many other trees.

3. Callistemon viminalis - Weeping Bottlebrush: Shrub or small tree with pendulous branches. Needs ample water. Not for windy, dry areas.

4. Cupressus macrocarpa - Monterey Cypresses: Native to California's Monterey Peninsula. Narrow and pyramidal in youth, spreading and picturesque in age or in windy coastal conditions. Away from cool coastal winds is very subject to coryneum canker fungus, for which there is no cure. Note: The fungus has been found in coastal Cypress as well.

5. Eucalyptus camaldulensis - Red Gum Eucalyptus: Ultimately 80-120 ft. Form varies; typically has curved trunk, spreading crown, gracefully weeping branches. Endures alkaline soils. Note: Does well along the coast.

6. Eucalyptus comuta - Yate Eucalyptus: Large headed, spreading tree. Attractive dense crown gives shade. Appreciated for its flowers, form and landscape uses. Grows under many kind of soil, water and climate conditions. Does well even when neglected. Not subject to wind breakage.

7. Eucalyptus ficifolia - Flowering Eucalyptus: Spectacular 1-ft clusters of flowers (mostly red but other colors) all year peaking in July-August. Best on coast, seldom successful inland. Rarely good in lawns.

8. Eucalyptus globulus - Blue Gum Eucalyptus: Most common eucalypt in California. Very aromatic. Magnificent windbreak but too messy, greedy and brittle for garden or city street. Needs deep soil and plenty of room. Best on coastal slopes.

9. Hakea suaveolens - Sweet Hakea: Tough, drought tolerant, especially good for seacoast. Full sun and take poor soil. Grows 10-20 ft. tall. Useful, fast growing barrier plant, background, or screen. Good with conifers. Can be pruned into tree form.

10. Leptospermum laevigatum - Australian Tea Tree: Large shrub or small tree. To 30 ft. high, often as wide. With the right soil, well drained, slightly acidic, lives long and well with little care. Can be planted close together to make a windbreak.

11. Melaluca species - Melaluca: Most melaluca stand heat, wind, poor soil, drought and sea air. Tough and adaptable, especially useful in sea winds. There are two species of Melaluca on this property.

12. Myoporum laetum - Myoporum: Tough and fast growing, takes full sun and are fire retardant. Thin to prevent wind damage and top heaviness. Superb for seaside use. Effectively blocks sound, wind, sun and blown sand. Not drought tolerant. Not good for tailored garden areas or near pools. Some leaf drop at all times and invasive roots.

13. Olea europaea - European Olive: Needs full sun. Most lush in deep rich soil, but will grow in shallow, alkaline or stoney soil. Performs adequately in coastal areas. Olives can be a nuisance.

14. Phoenix canariensis & Phoenix dactylifera - Date Palm: Grow on slopes, parks and big places.

15. Pinus radiata - Monterey Pine: Gets many pests in coastal California. Needs water to maintain vigor.

16. Pittosporum tobira - Tobira: Fairly drought tolerant. Best for screens, massing, or individually as crooked stemmed, free standing small tree.

IV. TREE INVENTORY

Trees suggested for removal because of health or structural problems are indicated with an (*) before their number. Some of these trees may not need removal if a natural setting remains. Review each tree individually for choosing the proper decision. Some groups of trees are listed as sub-groups within a grove.

Trees #1 - #99 are adjacent Cabrillo Blvd and Santa Barbara Street and provide a screen to the old RR yard & tracks and buildings.

#	Species	DBH	Comments
1	Acacia melanoxylon	10"	drought stressed, irrigate & prune deadwood
2	``Myoporum laetum	4"	decayed area in center of trunk (visible from east side) prune, inspect periodically
3	Acacia melanoxylon -	9"	drought stressed, prune deadwood
*4	Myoporum laetum	10"	declining, irrigate & prune deadwood or remove
5	—	24"	dead trunk, remove
6	Phoenix canariensis	24"	12' tall, young tree, transplant if desired
7	Acacia melanoxylon	12"-6"	drought stressed, irrigate & prune
8	Acacia melanoxylon	22"	note wounds on lower & upper portion of trunk,Possibly drought cracks or cankers caused by secondary fungi or bacteria, prune deadwood, irrigate and inspect periodically
9	Phoenix canariensis	24"	12' tall, transplantable
10	Myoporum laetum	8"	leaning, prune away from adjacent palm (#9), remove deadwood, poor specimen
11	Melaluca species	9"	structural prune, remove stump sprouts & deadwood
12	Myoporum laetum	8"	leaning tree, prune to remove excess weight
13	Myoporum laetum	5"	stressed, irrigate and structural prune
*14	Myoporum laetum	6"	stressed, conflicts with #15, structural prune or consider removal Note: #12,13 & 14 are a group

#	Species	DBH	Comments
15	Olea europaea	9"	drought stressed, remove deadwood & stump sprouts, note scale infestation, conflicts with adjacent Myoporum (#14)
16	Phoenix canariensis	24"	12' tall, contains a shrub growing at base, clean up previous pruning cuts
17	Phoenix canariensis	30"	clean up trunk and remove dead fronds, ball upper portion of trunk if desired
18	Acacia longifolia	11"	interesting form, prune away from adjacent Palm (#17) and light thin, remove horizontal trunk in ground to eliminate protrusion as best as possible
*19	Callistemon viminalis	--	stump sprouts, remove
20	Acacia longifolia	4	structural prune
*21	Melaluca species	--	stump sprouts that have grown considerably and should be restructured into a tree or removed note location over drainage culvert from road to swale, may be a problem
*22	Myoporum laetum	15"	drought stressed, note large decayed area on west side of trunk, potential long term liability, remove if tree is incorporated in a pedestrian area - if not, prune to balance & remove deadwood
23	Myoporum laetum	8"-8"	drought stressed, irrigate & prune deadwood
24	Myoporum laetum	4"-4"	drought stressed, irrigate & prune deadwood
25	Myoporum laetum	4"	drought stressed, irrigate & prune deadwood
26	Myoporum laetum	7"	drought stressed, irrigate & prune deadwood
27	Myoporum laetum	6"-6"-4"	drought stressed, irrigate & prune deadwood
28	Myoporum laetum	6"	drought stressed, irrigate & prune deadwood
29	Melaluca species	17"-16"	note large wound on south side of 17" trunk at approximately 8'-18', prune & irrigate, large % of dead foliage on east side of tree
30	Myoporum laetum	20"-6"	large tree for species, prune

#	Species	DBH	Comments
31	Myoporum laetum	8"-5"	understory tree to adjacent Cypress (#32), prune deadwood
32	Cupressus macrocarpa	60"	beautiful tree, remove deadwood and tree house, irrigate
33	Myoporum laetum	14"	understory tree to adjacent Cypress, prune
*34	Myoprum laetum	15"	fallen tree but still living, resting on concrete at edge of creek, provides a screen but may become a potential problem, consider removal
35	Acacia longifolia	12"	Leaning tree, grows horizontal at base over swale, provides an interesting feature, adds to screen and natural setting, note decay on lower portion of trunk, prune
36	Pittosporum tobira	5"	provides a screen, structural prune

Note the next trees #37 - #81 are located below high voltage wires. Many have been poorly pruned by utility trimmers .

37	Cupressus macrocarpa	26"	Manipulated by utility pruning but can still be appreciated, prune deadwood
38	Myoporum laetum	14"	understory tree to adjacent Cypress (#37), prune deadwood
39	Myoporum laetum	10"	Prune
*40	Myoporum laetum	6"-6"	dead tree, remove
41	Myoporum laetum	5"-3"-3"	drought stressed, prune & irrigate
42	Myoporum laetum	8"-10"-6"	drought stressed, irrigate & prune deadwood
43	Myoporum laetum	8"	prune
44	Cupressus macrocarpa	48"	prune deadwood
*45	Myoporum laetum	6"	poor form, no low lateral branches, only benefit is contributes to small grove & screens remove if desired

#	Species	DBH	Comments
*59	Acacia longifolia	11"-4"	leaning tree, note small column of decay spiraling up south trunk, slight decay visible at base, OK for natural setting, remove for improved park
60	Cupressus macrocarpa	30"	poorly pruned by utility trimmers, remove deadwood and preserve tree
*61	Eucalyptus cornuta	15"	hides adjacent telephone pole, poorly pruned by utility trimmers, OK for natural setting, removefor improved park
*62	Eucalyptus cornuta	15"	hides adjacent telephone pole, poorly pruned by utility trimmers, OK for natural setting, remove for improved park
*63	Eucalyptus globulus	10"	poor form, remove
64	Eucalyptus cornuta	5"	volunteer, remove if desired
65	Melaluca armillaris	24"	poorly pruned by utility trimmers, conflicts with adjacent Eucalyptus (#66), restructure tree
*66	Eucalyptus cornuta	10"	poor form, structural prune or remove for improved park
*67	Eucalyptus cornuta	6"	preserve for natural setting, remove for improved park
68	Myoporum laetum	4"	structural prune
69	Eucalyptus cornuta	26"	adjacent high voltage wires, directional prune
70	Eucalyptus cornuta	24"	adjacent high voltage wires, directional prune
71	Phoenix canariensis	24"	15' tall, transplantable
72	Eucalyptus cornuta	14"	prune
73	Eucalyptus cornuta	8"	prune
74	Eucalyptus cornuta	28"	prune
75	Eucalyptus cornuta	28"	prune
76	Phoenix canariensis	24"	15' tall, transplantable

#	Species	DBH	Comments
77	Eucalyptus cornuta	16"	prune
*78	Phoenix dactylifera	18"	leans with reverse bend half way up trunk, adjacent high voltage, volunteer tree growing out of base, remove
*79	Acacia melanoxylon	7"	conflicts with adjacent Eucalyptus ficifolia (#81), recommend removal
80	Eucalyptus ficifolia	10"	small tree, prune
81	Eucalyptus ficifolia	24"	good form, prune
82	Eucalyptus cornuta	28"	wound in trunk at 5', pruned to accommodate high voltage on SE side, adjacent sewer, root zone surrounded by asphalt, otherwise good form, prune

Trees #83 - #99 help screen old RR yard and buildings.

83	Leptospermum laevigatum	12"	light prune
*84	Acacia melanoxylon	6"-4"	rapidly declining, remove with 2 adjacent saplings
*85	Pinus radiata	11"	small tree, conflicts with adjacent Myoporum (#86), prune deadwood, remove if adjacent trees are also removed for improved park
*86	Myoporum laetum	10"-10"-5"	conflicts with Pine (#85), prune or remove with group
*87	Myoporum laetum	9"-6"	conflicts with Pine (#85), prune or remove with group
*88	Acacia longifolia	12"	decay in trunk, trunk grows almost parallel with ground, leave for screen or remove for improved park
*89	Hakea species	3"-3"	small tree, provides screen, appears to be supported by fence,remove for improved park
90	Myoporum laetum	10"-9"	prune deadwood

#	Species	DBH	Comments
*91	Eucalyptus cornuta	11"-3"	upper portion of tree are maturing sprouts, provides screen, restructure or remove, note wound in trunk at 12'
92	Eucalyptus cornuta	--	stump sprouts, remove
93	Leptospermum laevigatum	10"	prune
*94	Myoporum laetum	12"	single tree, poor form, remove and replace
95	Cupressus macrocarpa	24"	poorly pruned, needs corrective pruning
96	Myoporum laetum	12"-12" -10"-10"	provides screen, prune deadwood
97	Myoporum laetum	12"	provides screen, prune deadwood
98	Myoporum laetum	10"-3" -4"	provides screen, prune deadwood
99	Myoporum laetum	10"	provides screen, prune deadwood

Trees #100-#104 are a group of well formed trees and may provide an asset to this section of the property

100	Eucalyptus camaldulensis	16"	good form, prune
101	Eucalyptus camaldulensis	28"-20" -20"-6"	good form, prune, note pruning wound at top of SW trunk
102	Eucalyptus camaldulensis	25"	good form, prune
103	Eucalyptus camaldulensis	25"	good form, prune
104	Eucalyptus camaldulensis	24"-24"	good form, prune, note large wound on south trunk at 5' above ground, consider removal of this trunk at fork
*105	Eucalyptus camaldulensis	9"	volunteer, too close to bldg, remove during bldg. demolition

#	Species	DBH	Comments
*106	Eucalyptus cornuta	6"	Volunteers, too close to bldg., remove
*107	Eucalyptus cornuta	10"	Volunteers, too close to bldg., remove
108	Eucalyptus cornuta	40"-20"	large tree, good form, preserve if possible, soil compacted entirely around root zone from vehicles, note large broken limb at 40'-50', recently pruned
109	Eucalyptus cornuta	28"	recently pruned, good form, compacted soil in root zone
110	Eucalyptus cornuta	25"	recently pruned but deadwood remaining on ends of branches, good form, compacted soil in root zone, note wound at base
*111	Eucalyptus cornuta row 111-117		consists of approximately 7 trees, first 2 to the north end of the row are worth preservation (DBH of 18"-14" & DBH of 14"), but remove north most trunk of the multi-trunked tree, remaining trees are small except for 1 that was poorly pruned by utility trimmers, remove these last five trees
112	Eucalyptus cornuta	40"	good form, note culvert within dripline, prune
*113	Eucalyptus cornuta	4"	remove, conflicts with adjacent trees

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The trees #114 - #170 form a large linear grove of tall spreading trees. There are sub-groups within the grove and are addressed accordingly.

Trees #114 - #126 form a sub group. Trees #116, #117, #119, #120, #123, #124 & #126 are understory trees and are less desirable. Some of them lean considerably. Removal of these trees may provide more open space for an improved park. However if a natural dense setting is preferred then pruning will be required to improve their structure.

114	Eucalyptus cornuta	30"-15"	good form, prune
115	Eucalyptus cornuta	28"	stressed tree, good form, irrigate and prune
*116	Eucalyptus cornuta	6"	understory tree, volunteer, prune or remove
*117	Eucalyptus cornuta	4"	understory tree, volunteer, prune or remove
118	Eucalyptus cornuta	42"	good form, prune, note large broken limb hanging at 50'

#	Species	DBH	Comments
*119	Eucalyptus cornuta	12"-7"	understory tree, could be improved with pruning, or remove
*120	Eucalyptus cornuta	14"-14"	understory tree, could be improved with pruning or remove

Note: #119 & #120 are growing almost horizontal and could provide an attractive tunneling effect with proper pruning

121	Eucalyptus cornuta	42"	stressed tree, good form, irrigate & prune
122	Eucalyptus cornuta	45"	note wound at base, stressed tree, good form, irrigate & prune
*123	Eucalyptus cornuta	10"	understory tree, prune or remove
*124	Eucalyptus cornuta	16"	understory tree, prune or remove, note stub at base
125	Eucalyptus cornuta	45"	good form, prune
*126	Eucalyptus cornuta	9"	understory tree, poor form, remove if desired

Trees #126 - #134 are a sub-group

127	Eucalyptus cornuta	50"	stressed tree, good form, irrigate & prune, note cavity at base
*128	Phoenix canariensis	20"	8' tall, remove
129	Eucalyptus camaldulensis	14"-3"	grows intertwined with #130, prune or remove
*129a	Eucalyptus camaldulensis	8"	growing adjacent base of #130 and restricts growth, remove to ground without damaging #130
130	Eucalyptus cornuta	30"	good form, prune
131	Eucalyptus cornuta	28"	leaning but part of group, note wound at base, prune
132	Eucalyptus cornuta	30"	leaning but part of group, prune

Note that trees #133 - #142 are in poor health or may have structural flaws. If an open spot within the grove is important to the design of an improved park, then removal of these trees may provide that necessary area.

#	Species	DBH	Comments
*133	Eucalyptus cornuta	24"	extremely stressed, large wound at 3', fungus present (appears to be heart rot type, possibly Laetiporus sulfureus), tree is rapidly declining, remove for improved park
*134	Eucalyptus cornuta	48"	extremely stressed, wound on south part of trunk at 3', may be able to improve vigor with irrigation, prune or remove

Trees #135 - #138 are a sub-group. All trees in this group are recommended for removal. However the park design will dictate the decision for removal in this group.

*135	Eucalyptus cornuta	25"	stressed, note wound at base, tree complements #136, prune and irrigate or remove
*136	Eucalyptus cornuta	36"	stressed, note wound at base, fungus present, complements #135, prune and irrigate or remove
*137	Eucalyptus cornuta	28"	stressed, prune and irrigate or remove
*138	Eucalyptus camaldulensis	8"	understory tree, remove if desired
*139	Eucalyptus camaldulensis	3"	remove for improved park
*140	Eucalyptus cornuta	24"-16"	extremely stressed, note wound at base of both trunks, adjacent trees have previously been removed leaving this tree with no foliage on one side, tree is in fair condition, prune or remove for improved park, at minimum remove easterly trunk, remove built up soil mound between trunks if tree is to be preserved
*141	Eucalyptus camaldulensis	10"	extremely stressed, large wound on south side of trunk, skimpy tree, prune or remove for improved park, concerned about potential liability from decayed trunk

#	Species	DBH	Comments
*142	Eucalyptus camaldulensis	12"	extremely stressed, irrigate & prune or removed for improved park

Trees #143 - #145 are a sub-group. The three trees are intertwined. With proper pruning, they may be worth preservation. Another possibility would be to prune #144 and remove #143 & #145.

143	Eucalyptus camaldulensis	12"	large wound at 6', prune or remove
144	Eucalyptus cornuta	25"-14"	prune or remove, note broken hanging limb
*145	Eucalyptus camaldulensis	10"	column of decay from previous bad pruning wound in lower 8' of trunk, concerned about liability

Trees #146 - #152 are a sub-group in good condition.

146	Eucalyptus camaldulensis	14"	prune
147	Eucalyptus camaldulensis	16"	prune
148	Eucalyptus camaldulensis	28"	prune
149	Eucalyptus cornuta	20"	prune
150	Eucalyptus cornuta	25"	prune, remove lower stub
151	Eucalyptus cornuta	28"	stressed, lower lateral branches poorly structured, center leader is most valuable, prune tree
152	Eucalyptus camaldulensis	24"	leans but remains an attractive tree, embedded bark in lowest crotch, north limb continues and later conflicts 10' above crotch, consider installation of hardware, removal of important limb, or pruning and periodic inspections

Trees #153 - #161 are a sub-group. The drought stressed trees may recover with ample irrigation.

*153	Eucalyptus globulus	22"	drought stressed poor specimen, remove for improved park

#	Species	DBH	Comments
*154	Eucalyptus camaldulensis	12"	drought stressed, previously topped, remove
*155	Eucalyptus camaldulensis	14"	drought stressed, irrigate and prune or remove irrigation may help recovery
*156	Eucalyptus camaldulensis	26"	drought stressed, irrigate and prune or remove irrigation may help recovery
*157	Eucalyptus camaldulensis	6"	drought stressed, large wound at base, remove
158	Eucalyptus cornuta	30"	small area of decay at base and old pruning wound at 6', prune
159	Eucalyptus cornuta	24"	old pruning wound at base, prune tree
160	Eucalyptus cornuta	24"	cut old stubs to ground, prune tree
161	Eucalyptus cornuta	30"	prune

Trees #162 - #169 are a sub-group.

162	Eucalyptus camaldulensis	24"	prune
163	Eucalyptus globulus	28"	prune
164	Eucalyptus camaldulensis	32"	prune
165	Eucalyptus globulus	14"	prune
166	Eucalyptus globulus	24"	note decay on south side of trunk at 3', prune
*167	Eucalyptus camaldulensis	4"	large wound at base, remove
168	Eucalyptus camaldulensis	6"-4"	located over swale, prune
169	Eucalyptus camaldulensis	10"	located over swale, prune

#	Species	DBH	Comments
170	Eucalyptus globulus	10"-10" -10"	located over swale, prune, may require installation of a cable between trunks in future

Trees #171 - #176 are a sub-group.

171	Eucalyptus camaldulensis	10"	remove lowest limb back to trunk, prune tree
172	Eucalyptus camaldulensis	22"-14" -12"	prune
173	Eucalyptus camaldulensis	12"	prune
174	Eucalyptus camaldulensis	8"	prune
175	Eucalyptus camaldulensis	10"	prune
176	Eucalyptus camaldulensis	8"	remove adjacent sucker intertwining, prune
177	Eucalyptus cornuta	12"	young tree, structural prune
*178	Eucalyptus cornuta	10"	tree consists of an upright limb growing from a fallen trunk, remove
*179	Eucalyptus cornuta	10"	tree consists of an upright limb growing from a fallen trunk, remove

Appendix H

Alternatives Information

Alternative Scenario Forcaster

Amt	Type	Qualifier	Factor	WkDay PHT / Unit	Sunday PHT / Unit	WkDay ADT / Unit	Total Friday PHT	Total Sunday PHT	Total ADT
73,134	sq. ft.	Specialty Retail	25%	0.00407	0.00204	0.0407	74	37	744
5,000	sq. ft.	Restaurant	60%	0.00764	0.00573	0.0951	23	17	285
10	units	Apartments	100%	0.75	0.38	5.8	8	4	58
1,500	sq. ft.	Walk-up Restaurant	15%	0.008	0.008	0.075	2	2	17
0		Carousel	0%	39	66	390	0	0	0
9.70	acres	Park Use	NA	1.6	3.69	21.66	38	36	210
		Other		0	0	0	0	0	0
		Existing Trips					-20	-12	0
						Totals	125	84	1,314

Constraints:	
Maximum Peak Hour Trips - Friday PM	192
Maximum Peak Hour Trips - Sunday PM	192
Maximum Peak Hour Air Emissions	2.50
Minimum Walk-up Restaurant Size	1500.00
Minimum Sit Down Restaurant Size	7,500
Restaurant to Retail Ratio	0.16
Retail to Residential Ratio	5,280

Note 1: PHT & ADT rates are from Fiesta Park EIR

Note 2: Hostel Required

Note 3: Restaurant Seats Total 150

Note 4: Parking Assumed to be provided at overall rate of 1/250 sq. ft. all at grade

Note 5: Landscaping for Non-Residential = 20% of Gross Floor Area

Air Quality Constraints

ROC Rate/ADT	NOX Rate/ADT	ROX Emissions	NOX Emissions
0.0020	0.0012	0.5687	0.3373
0.0012	0.0015	0.9222	1.1448
0.0027	0.0022	0.1539	0.1264
0.0020	0.0012	0.0336	0.0200
0.0017	0.0018	0.0000	0.0000
0.0017	0.0018	0.3502	0.3721
0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000
Totals:		2.0286	2.0006

Air Quality Constraints

ROC Rate/ADT	NOX Rate/ADT	ROX Emissions	NOX Emissions
0.0020	0.0012	0.5687	0.3373
0.0012	0.0015	0.9222	1.1448
0.0027	0.0022	0.1539	0.1264
0.0020	0.0012	0.0336	0.0200
0.0017	0.0018	0.0000	0.0000
0.0017	0.0018	0.3502	0.3721
0.0000	0.0000	0.0000	0.0000
0.0000	0.0000	0.0000	0.0000
Totals:		**2.0286**	**2.0006**

Project Name : SB WATERFRONT SUPER. ALT. Date : 05-12-1993

Analysis Year = 1995 Temperature = 50
EMFAC7 VERSION : EMFAC7D ...11/88

Unit Type	Trip Rate	Size	Tot Trips	Days Op.
Park	210.0/Park	1	210	1
Apartment < 10 Du./Acre	5.8/Unit	10	58	
Specialty Retail	10.2/1000 Sqf	73	744	1
Restaurant (Walk-up)	11.3/1000 Sqf	2	17	1
Restaurant (Sit Down)	57.0/1000 Sqf	5	285	1
Youth Hostel	100.0/Unit	1	100	

	Residential			Commercial	
	Home-Work	Home-Shop	Home-Other	Work	Non-Work
Trip Length	5.3	3.4	4.2	4.7	3.6
Started Cold	88.2	40.1	58.0	77.2	27.0
Trip Speed	35	35	35	35	35
Percent Trip	27.3	21.2	51.5		

Vehicle Fleetmix

Vehicle Type	Percent Type	Leaded	Unleaded	Diesel
Light Duty Autos	72.8	1.7	95.6	2.7
Light Duty Trucks	14.3	2.2	95.0	2.8
Medium Duty Trucks	4.3	5.3	94.7	0.0
Heavy Duty Trucks	3.9	29.8	70.3	N/A
Heavy Duty Trucks	3.9	N/A	N/A	100.0
Motorcycles	0.9	100.0	N/A	N/A

Project Emissions Report in Lb/Day

Unit Type	TOG	CO	NOx
Park	3.8	43.2	3.6
Apartment < 10 Du./Acre	1.2	13.7	1.0
Specialty Retail	9.9	106.0	11.4
Restaurant (Walk-up)	0.2	2.5	0.3
Restaurant (Sit Down)	3.9	41.8	4.4
Youth Hostel	2.1	23.6	1.8

Project Emissions Report in Lb/Day

Unit Type	FUEL USE	PM10	SOx
Park	38.9	9.2	0.4
Apartment < 10 Du./Acre	11.3	0.1	0.1
Specialty Retail	120.3	3.5	1.1
Restaurant (Walk-up)	2.8	0.2	0.0
Restaurant (Sit Down)	46.5	2.7	0.4
Youth Hostel	19.5	0.2	0.2

Land Use	PHT	ADT	Peak Hour %	Daily TOG	Daily NOx
Park	38	210	0.18	3.8	3.6
Apartment	8	58	0.14	1.2	1
Specialty Retail	74	744	0.10	9.9	11.4
Restaurant (walk-up)	2	17	0.12	0.2	0.3
Restaurant (sit down)	23	285	0.08	3.9	4.4
Youth Hostel	10	100	0.10	2.1	1.8
Peak Hour Emissions					
Land Use	TOG	ROC	NOx		
Park	0.69	0.63	0.65		
Apartment	0.17	0.15	0.14		
Specialty Retail	0.98	0.90	1.13		
Restaurant (walk-up)	0.02	0.02	0.04		
Restaurant (sit down)	0.31	0.29	0.36		
Youth Hostel	0.21	0.19	0.18		
Totals		2.18	2.49		
Notes:					
Peak Hour Emissions is equal to Daily Emissions times the Peak Hour					
Percentage (percentage of daily trips occurring during the peak					
transportation hour).					
TOG x 0.913 equals ROC					

Comment Letter Received at the City of Santa Barbara
Environmental Review Committee Hearing for Certification
of the Waterfront Park and Hotel and Youth Hostel Project
Final EIR on June 18, 1993

ENVIRONMENTAL DEFENSE CENTER

June 18, 1993

Environmental Review Committee
City of Santa Barbara
De La Guerra Plaza
Santa Barbara, CA 93101

Re: Administrative Final Environmental Impact Report for the Waterfront Park and Hotel and Youth Hostel Project

Dear Committee Members,

Thank you for this opportunity to comment on the Administrative Final EIR for the proposed Waterfront Hotel and Park Project. EDC's comments on the Draft EIR focused primarily on the alternatives analysis (see letter dated April 16, 1993). We are pleased that two of the previously included alternatives -- "Alternative Use Allowed Under the Specific Plan" and "Alternative Use/Plazuela Concept" -- have been deleted. The revised alternative ("Alternative Project Design Consistent with the Specific Plan") is a major improvement because it identifies a project which is not only consistent with the Specific Plan, but which also carries out the mandate of CEQA that alternatives be analyzed which are capable of *reducing* a project's adverse environmental impacts. We would hope that this alternative would offer a mixture of retail development which includes both cultural and economic diversity, and which provides services and goods attractive to both tourists and local residents. An example of this type of development is the Olivera Plaza in Los Angeles.

With respect to the hostel, the AFEIR continues to contain misinformation tying the development of the hostel to approval of development on Parcels B and C. As several people have noted, the current proposal must not be allowed to count as mitigations those measures which were already imposed for development of the Red Lion Inn in 1981. The hostel is one such measure. According to the conditions placed on the Red Lion Inn Specific Plan, the hostel (or land and financing for the hostel) was required to be provided within 2 years *after occupancy of the Red Lion Inn.* Specifically, Coastal Commission Condition D-4 states that "[i]f the applicant selects optional condition number 1 the dedication of land and provision of the financial device shall be made prior to any development on parcels B or C, but in no case later than two (2) years after the occupancy of the hotel/convention center." (See attached; emphasis added.) The EIR and Responses to Comments must be revised to correct this misinformation. (It should be noted that the Responses to Comments allegedly rely upon statements made by Assistant City Attorney Steve Wiley at the ERC hearing (comments 11-16 - 11-19); however, Mr. Wiley's comments only state that dedication of the open space on Parcels B and C was contingent upon further development approvals.)

We also have a couple comments regarding the park. First, the EIR should acknowledge that the condition placed upon development of the Red Lion Inn included not only dedication of land for a public park, but also "improvement" of the park. (See attached City Condition C.) Therefore, the developer already has the obligation to provide a minimum degree of park development. The City need not incur these costs.

906 GARDEN STREET, SUITE 2, SANTA BARBARA, CA 93101

(805)963-1622 FAX(805)962-3152 ECONET ADDRESS: EDC

With respect to a more developed park, we remain concerned that the proposed park could be more accessible to local residents and youth. The City has espoused a policy prioritizing increased recreational opportunities for youth. The waterfront park would be an ideal place to start. What efforts has the City made to involve youth in the planning process for the public park?

The "Alternative Park Programming" alternative should be revised to examine park alternatives for the entire park site, not just a portion. Limiting the area for alternatives limits the type and range of alternatives as well.

Finally, the statements regarding economic feasibility are unsupported by any data. There is no empirical evidence to suggest that a smaller (e.g. 80-room) hotel would not be economically viable.

Thank you for your attention to these comments.

Sincerely,

Linda Krop
Staff Attorney

cc: East Beach Planning Committee

and operate it in perpetuity as a hostel. The provision of the hostel under this option shall not displace existing low or moderate income lodging facilities within the City's coastal zone and shall be done in a manner consistent with the City's housing policies of its LUP. The hostel shall not be provided above space utilized for entertainment or night activity.

4. If the applicant selects either optional condition 2 or 3, the hostel shall be constructed concurrently with the development of parcel B or C or construction commenced within two (2) years after the beginning of occupancy of the hotel, whichever is sooner.

If the applicant selects optional condition number 1 the dedication of land and provision of the financial devt. shall be made prior to any development on parcels B or C, but in no case later than two (2) years after the occupancy of the hotel/convention center.

E. Prior to the issuance of a coastal development permit the applicant shall submit to the Executive Director for his review and approval, in consultation with the appropriate city agency, a landscape plan for parcel A. Said plan shall insure that the public use of the setback area of parcel A shall not be restricted by the vegetative plantings. Said plan may contain vegetative materials in a pattern intended to insure hotel security at and in the immediate vicinity of the building facades.

F. Because the conditions imposed upon the Hotel Conference Center, Specific Plan, tentative map and parking modification by the City are essential to the construction and operation of the projects, consistent with the protection of major coastal resources, the Commission incorporates those conditions as part of its approval and adds them to the conditions herein.

III. Project Description

The applicant requests a coastal development permit for the following developments:

a. Subdivision of 31.499 acres (2 parcels) of land into 3 parcels as follows:

Parcel A = 23.556 acres
Parcel B = 5.178 acres
Parcel C = 2.765 acres

b. On Parcel A: construction of a 360 room hotel convention center with a conference capacity of 1,000 persons. The hotel would have restaurant, bar, retail space, etc. Additional project elements are: 925 at-grade parking spaces, tennis courts, public/private open spaces and plazas, related on-street roadway and intersection improvements/signalization, and demolition of the existing Southern Pacific roundhouse along with leasehold improvements located by the railroad tracks. (See Exhibit B for detailed Hotel/Center description)

Note: Parcels B and C are not the subject of actual development proposals within this application. However, in accordance with its certified Land Use Plan of its Local Coastal Program (LUP policy 4.6) the City in its review and approval of both the Subdivision and Hotel Convention Center Development Plan (see Exhibit A for other city granted approvals) did require the submittal of a Specific Plan for the entire 31.499 acre site

developed), and that the remaining acreage shall be preserved and protected for public open recreational use by a conveyance of development rights, or other suitable mechanism to the public upon approval of development permits for parcels B or C.

C. In accordance with the City's condition number 7A 1b of the Specific Plan approval, residential units shall not utilize deficiency points unless the residential use is found to be consistent with LUP policies 11.2 and 11.1 and Coastal Act Section 30254. If such uses are permitted their number shall not exceed 18 or the equivalent of less than one deficiency point. No more than 25 percent of the total internal residential floor space shall be located on the ground floor.

D. Prior to the issuance of a permit, the applicant shall enter into an agreement with the California Coastal Commission providing for one of the following alternatives. This agreement shall bind the applicant and any successors in interest to the real property known herein as parcels A, B and C and shall be recorded as a covenant to run with the land free of prior liens and encumbrances other than tax liens, in a form approved by the Executive Director. The applicant shall select one of the following alternative conditions prior to the issuance of the permit. The selected alternative will be incorporated into the original agreement. Any of the other alternative conditions may later be selected by the applicant, and in that event the agreement shall be amended accordingly. The form of the amendment (but not the alternative selected), shall be approved by the Executive Director of the Commission.

The applicant will comply with one of the three optional conditions below. All of the optional conditions are subject to Condition No. 4.

1. Record an irrevocable offer to dedicate to a public agency or private organization, acceptable to the Executive Director of the Commission, 18,000 sq. ft. of land for the purposes of constructing and operating a hostel within 3.4 acres on parcels B or C at a location acceptable to the Executive Director, and provide a certificate of deposit, escrow account, bond or other financial device in an amount necessary to fund the combined estimated costs of engineering, design and permit processing for constructing the hostel at a point five (5) years from the date of accepting this permit. Said financial device and amount shall be reviewed and approved by the Executive Director.

2. Prepare and implement a program and construct a 75 bed hostel on parcel B or C and dedicate it to a public agency or private organization which will own and operate it in perpetuity as a hostel. The hostel shall meet the criteria for a superior grade hostel facility as established by the American Youth Hostel Association. If the hostel is constructed on a second story, it shall be above retail space or space not utilized for entertainment and/or night activity.

3. Prepare and implement a program and construct or otherwise provide a 75 bed hostel off-site within the City's coastal zone between Castillo Street on the west and the cemetary on the east in any location acceptable to the Executive Director. The hostel shall meet the criteria for a superior grade hostel facility as established by the American Youth Hostel Association. The hostel shall be dedicated to a public agency or private organization which will

5. View Corridors/Distance Between Buildings

a. Prior to the development of Parcels A, B and C, a view corridor study shall be provided to determine the necessary distances between buildings. Views shall be assessed from Cabrillo Bouleveard toward the foothills and mountains. The Architectural Board of Review and Landmarks Committee shall advise the Planning Commission on the determination of view corridors. In no case shall building separations be less than permitted in the basic zone established for the property.

b. All buildings shall be oriented to preserve and enhance the determined view corridors.

6. Signs

a. All signs shall be subject to review and approval, disapproval, or conditional approval by the Sign Subcommittee.

b. Signs shall be minimal, clear and unobtrusive.

c. Pole signs as defined in the City's Zoning Ordinance shall not be permitted.

d. A complete sign program shall be established and approved by the Sign Subcommittee for the future development of Parcels A, B and C.

7. Other Regulations

a. All utilities shall be placed underground.

b. All exterior lighting shall be low intensity and the "white" light color spectrum, except that necessary for recreational activities.

c. Lighting standards shall be designed in harmony with the coastal orientation of the site and architectural design of the building.

d. Lighting standards shall not exceed 12 feet in height, excepting public street lights along the street right-of-way or that necessary for recreational activities.

C. Recreation and Open Space

1. Parcel A

A condition of development of a hotel/conference center of Parcel A shall include dedication and the improvement of a park site. The amount of area shall be 4 acres per 1000 persons based upon two (2) persons per guest room.

2. Parcel B and C

Additional dedication and improvement of park land may be required. The amount will be predicated upon the generated recreation demand by the particular project.

ENVIRONMENTAL DEFENSE CENTER

June 18, 1993

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developed), and that the remaining acreage shall be preserved and protected for public open recreational use by a conveyance of development rights, or other suitable mechanism to the public upon approval of development permits for parcels B or C.

C. In accordance with the City's condition number 7A 1b of the Specific Plan approval, residential units shall not utilize deficiency points unless the residential use is found to be consistent with LUP policies 11.2 and 11.1 and Coastal Act Section 30254. If such uses are permitted their number shall not exceed 18 or the equivalent of less than one deficiency point. No more than 25 percent of the total internal residential floor space shall be located on the ground floor.

D. Prior to the issuance of a permit, the applicant shall enter into an agreement with the California Coastal Commission providing for one of the following alternatives. This agreement shall bind the applicant and any successors in interest to the real property known herein as parcels A, B and C and shall be recorded as a covenant to run with the land free of prior liens and encumbrances other than tax liens, in a form approved by the Executive Director. The applicant shall select one of the following alternative conditions prior to the issuance of the permit. The selected alternative will be incorporated into the original agreement. Any of the other alternative conditions may later be selected by the applicant, and in that event the agreement shall be amended accordingly. The form of the amendment (but not the alternative selected), shall be approved by the Executive Director of the Commission.

The applicant will comply with one of the three optional conditions below. All of the optional conditions are subject to Condition No. 4.

1. Record an irrevocable offer to dedicate to a public agency or private organization, acceptable to the Executive Director of the Commission, 18,000 sq. ft. of land for the purposes of constructing and operating a hostel within 3.4 acres on parcels B or C at a location acceptable to the Executive Director, and provide a certificate of deposit, escrow account, bond or other financial device in an amount necessary to fund the combined estimated costs of engineering, design and permit processing for constructing the hostel at a point five (5) years from the date of accepting this permit. Said financial device and amount shall be reviewed and approved by the Executive Director.

2. Prepare and implement a program and construct a 75 bed hostel on parcel B or C and dedicate it to a public agency or private organization which will own and operate it in perpetuity as a hostel. The hostel shall meet the criteria for a superior grade hostel facility as established by the American Youth Hostel Association. If the hostel is constructed on a second story, it shall be above retail space or space not utilized for entertainment and/or night activity.

3. Prepare and implement a program and construct or otherwise provide a 75 bed hostel off-site within the City's coastal zone between Castillo Street on the west and the cemetary on the east in any location acceptable to the Executive Director. The hostel shall meet the criteria for a superior grade hostel facility as established by the American Youth Hostel Association. The hostel shall be dedicated to a public agency or private organization which will

5. View Corridors/Distance Between Buildings

a. Prior to the development of Parcels A, B and C, a view corridor study shall be provided to determine the necessary distances between buildings. Views shall be assessed from Cabrillo Bouleveard toward the foothills and mountains. The Architectural Board of Review and Landmarks Committee shall advise the Planning Commission on the determination of view corridors. In no case shall building separations be less than permitted in the basic zone established for the property.

b. All buildings shall be oriented to preserve and enhance the determined view corridors.

6. Signs

a. All signs shall be subject to review and approval, disapproval, or conditional approval by the Sign Subcommittee.

b. Signs shall be minimal, clear and unobtrusive.

c. Pole signs as defined in the City's Zoning Ordinance shall not be permitted.

d. A complete sign program shall be established and approved by the Sign Subcommittee for the future development of Parcels A, B and C.

7. Other Regulations

a. All utilities shall be placed underground.

b. All exterior lighting shall be low intensity and the "white" light color spectrum, except that necessary for recreational activities.

c. Lighting standards shall be designed in harmony with the coastal orientation of the site and architectural design of the building.

d. Lighting standards shall not exceed 12 feet in height, excepting public street lights along the street right-of-way or that necessary for recreational activities.

C. Recreation and Open Space

1. Parcel A

A condition of development of a hotel/conference center of Parcel A shall include dedication and the improvement of a park site. The amount of area shall be 4 acres per 1000 persons based upon two (2) persons per guest room.

2. Parcel B and C

Additional dedication and improvement of park land may be required. The amount will be predicated upon the generated recreation demand by the particular project.

June 18, 1993

Environmental Review Committee
City of Santa Barbara
De La Guerra Plaza
Santa Barbara, CA 93101

Re: Administrative Final Environmental Impact Report for the Waterfront Park and Hotel and Youth Hostel Project

Dear Committee Members,

Thank you for this opportunity to comment on the Administrative Final EIR for the proposed Waterfront Hotel and Park Project. EDC's comments on the Draft EIR focused primarily on the alternatives analysis (see letter dated April 16, 1993). We are pleased that two of the previously included alternatives -- "Alternative Use Allowed Under the Specific Plan" and "Alternative Use/Plazuela Concept" -- have been deleted. The revised alternative ("Alternative Project Design Consistent with the Specific Plan") is a major improvement because it identifies a project which is not only consistent with the Specific Plan, but which also carries out the mandate of CEQA that alternatives be analyzed which are capable of *reducing* a project's adverse environmental impacts. We would hope that this alternative would offer a mixture of retail development which includes both cultural and economic diversity, and which provides services and goods attractive to both tourists and local residents. An example of this type of development is the Olivera Plaza in Los Angeles.

With respect to the hostel, the AFEIR continues to contain misinformation tying the development of the hostel to approval of development on Parcels B and C. As several people have noted, the current proposal must not be allowed to count as mitigations those measures which were already imposed for development of the Red Lion Inn in 1981. The hostel is one such measure. According to the conditions placed on the Red Lion Inn Specific Plan, the hostel (or land and financing for the hostel) was required to be provided within 2 years *after occupancy of the Red Lion Inn.* Specifically, Coastal Commission Condition D-4 states that "[i]f the applicant selects optional condition number 1 the dedication of land and provision of the financial device shall be made prior to any development on parcels B or C, but in no case later than two (2) years after the occupancy of the hotel/convention center." (See attached; emphasis added.) The EIR and Responses to Comments must be revised to correct this misinformation. (It should be noted that the Responses to Comments allegedly rely upon statements made by Assistant City Attorney Steve Wiley at the ERC hearing (comments 11-16 - 11-19); however, Mr. Wiley's comments only state that dedication of the open space on Parcels B and C was contingent upon further development approvals.)

We also have a couple comments regarding the park. First, the EIR should acknowledge that the condition placed upon development of the Red Lion Inn included not only dedication of land for a public park, but also "improvement" of the park. (See attached City Condition C.) Therefore, the developer already has the obligation to provide a minimum degree of park development. The City need not incur these costs.

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(805)963-1622 FAX(805)962-3152 ECONET ADDRESS: EDC

With respect to a more developed park, we remain concerned that the proposed park could be more accessible to local residents and youth. The City has espoused a policy prioritizing increased recreational opportunities for youth. The waterfront park would be an ideal place to start. What efforts has the City made to involve youth in the planning process for the public park?

The "Alternative Park Programming" alternative should be revised to examine park alternatives for the entire park site, not just a portion. Limiting the area for alternatives limits the type and range of alternatives as well.

Finally, the statements regarding economic feasibility are unsupported by any data. There is no empirical evidence to suggest that a smaller (e.g. 80-room) hotel would not be economically viable.

Thank you for your attention to these comments.

Sincerely,

Linda Krop
Staff Attorney

cc: East Beach Planning Committee

and operate it in perpetuity as a hostel. The provision of the hostel under this option shall not displace existing low or moderate income lodging facilities within the City's coastal zone and shall be done in a manner consistent with the City's housing policies of its LUP. The hostel shall not be provided above space utilized for entertainment or night activity.

4. If the applicant selects either optional condition 2 or 3, the hostel shall be constructed concurrently with the development of parcel B or C or construction commenced within two (2) years after the beginning of occupancy of the hotel, whichever is sooner.

If the applicant selects optional condition number 1 the dedication of land and provision of the financial device shall be made prior to any development on parcels B or C, but in no case later than two (2) years after the occupancy of the hotel/convention center.

E. Prior to the issuance of a coastal development permit the applicant shall submit to the Executive Director for his review and approval, in consultation with the appropriate city agency, a landscape plan for parcel A. Said plan shall insure that the public use of the setback area of parcel A shall not be restricted by the vegetative plantings. Said plan may contain vegetative materials in a pattern intended to insure hotel security at and in the immediate vicinity of the building facades.

F. Because the conditions imposed upon the Hotel Conference Center, Specific Plan, tentative map and parking modification by the City are essential to the construction and operation of the projects, consistent with the protection of major coastal resources, the Commission incorporates those conditions as part of its approval and adds them to the conditions herein.

III. Project Description

The applicant requests a coastal development permit for the following developments:

a. Subdivision of 31.499 acres (2 parcels) of land into 3 parcels as follows:

Parcel A = 23.556 acres
Parcel B = 5.178 acres
Parcel C = 2.765 acres

b. On Parcel A: construction of a 360 room hotel convention center with a conference capacity of 1,000 persons. The hotel would have restaurant, bar, retail space, etc. Additional project elements are: 925 at-grade parking spaces, tennis courts, public/private open spaces and plazas, related on-street roadway and intersection improvements/signalization, and demolition of the existing Southern Pacific roundhouse along with leasehold improvements located by the railroad tracks. (See Exhibit B for detailed Hotel/Center description)

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