

Allied Neighborhoods Association

June 22, 2010

RE: Joint Council and Planning Commission Work Session: Plan Santa Barbara General Plan Update

Allied members have attended almost every meeting on Plan Santa Barbara and made statements in addition to submitting written material. However, we are still concerned that Plan Santa Barbara has not been responsive to a number of people's comments. In addition, we have found the DEIR to be extremely difficult to follow.

At the Planning Commission meetings we have made statements and we understood that the Alternatives were not fixed in stone and that some type of hybrid Alternative would be the result of their deliberations.

We do not agree with a number of the Staff and Planning Commission recommendations that are before you.

Targeted Growth:

We do not believe that the proposed policies for protection of Historic Resources provide adequate protection for these important resources. The 100 foot buffer is not enough. For significant resources like the Presidio we believe that the whole block must be part of the buffer. We also have recommended that no structure in the area around a historic structure be taller than the historic resource.

We have also asked that the increased growth be spread throughout the city so as not to impact any particular area.

Average Unit Size:

In the past, we have been critical of the size, bulk and scale of a number of projects, so we see smaller units as a positive change to address this problem. **We**

do not see smaller units as a means to pack more people into the downtown area.

Residential Density:

We strongly support keeping the base density of 15 – 27 units per acre.

Anything higher is inappropriate for our city. We are strongly opposed to the proposed base density range of 27 – 45 dwelling units per acre and the proposed maximum density of 46 - 60 units per acre. Under no circumstance do we want to see large behemoths like those on Chapala Street.

The definition of Community Benefit should be void for vagueness. We would replace it with Requirements: either employer assisted housing or rental housing.

We are opposed going to the higher densities because if these units are developed by the private sector, there is **no legal ability to mandate that these units will only be bought by the intended target group, the workforce.** In addition, it is not possible to ensure that just because the residents are near public transportation they will use it. The MTD has already questioned their financial ability to provide additional services.

This increased density will not solve the jobs/housing imbalance. Since this is for workforce housing, many of the people who work downtown will not be able to afford it. Also, many people do not want this type of unit. For these reasons, employees will continue to commute.

We would support the Low Housing Alternative with its increase limited to 2000 new units. According to the DEIR, this Alternative has the least environmental impacts. Since many of the assumptions as to the success of these strategies have not been analyzed in the DEIR, we believe that this small number would be the most prudent course to follow.

Building Heights:

We opposed to building heights over 45 feet. Going to four stories makes a project more expensive to build because of additional building code requirements and results in units less affordable to the workforce.

Housing Overlays

We would support the 50% for rental and employer assisted housing only if the base density is kept at the 15 – 27 units per acre range.

Transportation Demand Management (TDM)

We are opposed to expanded parking pricing. We concur with the downtown merchants that this will have a negative effect on downtown businesses. We also believe that implementation of the new system will be quite costly to the city. Price parking will penalize people who live in many of our neighborhoods, as they do not live within walking distance of downtown. They may very well choose to go elsewhere. Any reduction of public parking availability should be made in concert with increased transit services.

Second Units:

We are opposed to the relaxation of many of the second unit standards. This is especially true of those dealing with parking, size of unit, size of lot, number of occupants and separate water meters. Second units are not counted in the square footage limits in the NPO and so in order to allow this, the NPO ordinance would have to be changed. We have also expressed concern about the location and suitability of second units in certain neighborhoods. There would need to be additional findings that individual neighborhoods and possibly even the individual streets could accommodate more second units.

Thank you for your consideration of our concerns.

Cathie McCammon, President