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August 21, 2022

Re: 418 N. Milpas (August 22, 2022 ABR Agenda, Item #5)

Chair Moore and Board Members,

Allied Neighborhoods Association appreciates the opportunity to provide comment on the project.

1. NO PHOTOS

No photos are included with the architectural drawings online. The project needs to be **postponed** due to this absence of photos.

Photos need to include streetscape photos of the 400 block of North Milpas Street (on the project side) and streetscape photos of the 900 block of East Gutierrez (on the project side). Also, more photos are needed in addition to the streetscape photos mentioned.

Context photos are a requirement to get on an agenda, and especially important because this is the largest housing project (90 units) ever proposed in the Milpas area.

Just 2 weeks ago at ABR, there was a 2-story pre-app consultation on a project on West Montecito Street that didn't have streetscape photos. This was a problem for the ABR, and during the subsequent discussion, the supervising staff person said they would be making sure that this would not happen again. Here we are 2 weeks later and this is happening again, yet this time on a very large project.

This project needs to be postponed - due to the absence of photos.

2. LACK OF ARTICULATION – NORTH ELEVATION

A building needs to be designed on all 4 sides. The 4-story North elevation is a blank wall.

A Google search of the address of 418 N. Milpas shows a building in the background, slightly to the left. That building which may be towards the back of a property off the 900 block of East Haley Street, has covered walkways, windows and probably doors. This building

does not appear to have been taken into consideration in regards to the North elevation. Additionally, this 4-story blank wall is likely visible from adjacent and nearby properties, as well as other vantage points.

3. LACK OF ARTICULATION – SOUTH ELEVATION

The portion of the building above Rusty's Pizza is ghosted in on the South elevation drawing and it may not be obvious that there is no articulation on that blank wall, that is closest to Milpas Street.

4. MASSIVE PROJECT

This project is very, very large. The mass, bulk, scale, height, and size are out of character with the immediate neighborhood and not compatible.

A pre-application consultation is the opportunity for the ABR to comment on the overall project and how it fits on the site and into the immediate neighborhood. Now is the time to express your opinion if you think the project is too big for the location. You need to be thinking ahead about how/if you would be able to make the Project Compatibility Findings later in the process, specifically #2 and #3 (see below) which relate to mass, bulk, scale, height, and size and neighborhood compatibility.

#2 The design of the project is compatible with desirable architectural qualities and characteristics that are distinctive of Santa Barbara and of the particular neighborhood surrounding the project.

#3 The size, mass, bulk, height, and scale of the project are appropriate for its location and neighborhood.

5. PRE-APP CONSULTATION

Relatively new State housing law talks about not reducing density; this applies to projects which have submitted a complete application. As this consultation is prior to submittal of a complete application, this State housing law does not apply to the project at this early stage.

As a recent example, HLC had a pre-app consultation of 222 E. Canon Perdido and thought this housing project was too big. They communicated this to the applicant, and the applicant returned with a smaller project/fewer housing units.

Thank you for your consideration of our comments.

We'd also like to thank ABR members for your service.

Sincerely,
Allied Neighborhoods Association