



Public Comment Received for:

Admin Draft Objective Design and Development
Standards

Name of Sender
1. Steve Johnson
2. Anne Petersen & Mike Imwalle on behalf of the Santa Barbara Trust for Historic Preservation
3. Cassandra Ensberg on behalf of American Institute of Architects, Santa Barbara (AIASB)
4. Fred Sweeney
5. Pat Saley
6. Steve Dowty
7. Richard Closson
8. Richard Closson
9. Detty Peikert & Cassandra Ensberg on behalf of AIASB

Public Comment #1

From: [Steve Johnson](#)
To: [Santa Barbara Design Standards](#)
Subject: Admin Draft Objective Design and Development Standards
Date: Wednesday, November 02, 2022 11:16:35 AM

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EXTERNAL

Page 62 (25.05.050 Sloped Parcels, item C 2):

"Design sites shall not be within 50 feet of the high-water centerline of perennial creeks and intermittent creeks with defined channels."

How is the high water centerline determined?

There should be an objective description of how to make the determination.

I suggest that it should be based on a revised, **objective** definition of top of bank (30.15.040).

Steven Johnson
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805-699-5364
319 W Cota, SB 93101



Santa Barbara Trust for Historic Preservation

To preserve, restore, reconstruct and interpret historic sites in Santa Barbara County

Public Comment #2

December 6, 2022

City of Santa Barbara
PO Box 1990
Santa Barbara, CA 93102-1990

Dear Santa Barbara City's Housing Initiatives Staff and Members of the Historic Landmarks Commission;

The Santa Barbara Trust for Historic Preservation (SBTHP) appreciates the opportunity to comment on the draft Objective Design Standards. We appreciate the level of detailed work going into this document and believe it will be an asset in the process of meeting our community's housing requirements. We are most concerned with the potential impacts of development on the City's historic resources and ensuring the protections to those resources outlined in the City's Historic Resources Element. It is in that frame of reference that we respectfully submit the following comments:

Objective Design & Development Standards

Page 40: illustrates the way the fourth floor of a four-story residential building is stepped back from the Right-of-Way line. Are there examples of how five and six story residential buildings will be stepped back or is that not required?

Page 44, footnote No. 2: references the definition of a Community Benefit Project in another document. Please add the definition of Community Benefit Project to the definitions in Chapter 12, because it is a significant exception to the standards.

Page 50, Section 25.03.080: addresses Solar Access Height Limitations. In addition to the Solar Access Height Limitation calculations presented here, special consideration should be given to limit the heights of buildings proposed around historic adobe buildings.

Page 164: The architectural style overview refers to only five styles, craftsman, Spanish Revival, Italian Mediterranean sub-style, modern and industrial. We believe "Spanish Revival" should be changed to read "Spanish Colonial Revival," for compatibility with other City descriptions of this style. Also, we question why these five styles were chosen, when the City includes many additional common historical architectural styles on this page on the City's website:

<https://santabarbaraca.gov/government/priorities-policies/historic-preservation/historic-architectural-styles> Absent on this page are the contemporary and industrial styles. Should we expect continuity with the ODDS document and the City's list of common historic architectural styles?

Chapter 9, pg. 221: The sign type chapter refers to sign types that are not allowed in the City's sign ordinance, including signs that are on canopies other than the valance portion (page 229, "store logo" example) and sandwich boards or "sidewalk signs" (page. 236). The ordinance allows no commercial

signs on the public right of way, including sidewalks:

(https://library.qcode.us/lib/santa_barbara_ca/pub/municipal_code/item/title_22-chapter_22_70-22_70_03) Page 289 definitions includes a definition for “portable signs.” The sign ordinance does not allow portable signs. Is there a plan to change the sign ordinance along with this document?

Chapter 11, pp. 251-264: addresses exceptions to the Standards. Several possible exceptions refer conditions where “An existing historic building/feature, tree, rock outcrop, and/or utility infrastructure prevents compliance with the standard.” Chapter 12, Definitions, does not provide a definition for “Historic Building.” It seems from the context that historic building refers to existing buildings and not necessarily historic resources. Since the term “historic building” is used with reference to relief from and exceptions to the ODDS, it would be very helpful to add definitions of Historic Building and Historic Resource to the definitions in Chapter 12 and refer to the appropriate sections of the Historic Resource Element.

ODDS Zone Map

The proposed ODDS Zone Map needs additional consideration with regard to existing designated historic resources. Below is a partial listing of designated historic resources that are inappropriately zoned as part of the Proposed Priority Housing Overlay on the current ODDS Zone Map. The below-mentioned properties are all designated for high density development on the Proposed Priority Housing Overlay on the existing ODDS Zone Map. Page 21 of the Objective Design & Development Standards, Section 25.02.030 addresses Zone Map Amendments. Just as the City’s Parks & Recreation properties and El Presidio de Santa Barbara State Historic Park are shown as un-zoned, these additional properties should also be shown as un-zoned. Please amend the zone map to show the below-mentioned properties as un-zoned and not part of the Proposed Priority Housing Overlay.

In addition, the Zone Map should indicate landmarks and other historic structures that are protected by measures in the Historic Resources Element such as special setbacks for adobe buildings, etc. It would be helpful to add another symbol to the map legend to signify the location of designated historic buildings/sites that may potentially lead to exceptions to the standards. This would serve as a notice to developers that surrounding parcels may be subject to other restrictions and that development according to the ODDS may be limited.

9 E. De la Guerra (Casa de la Guerra)

Casa de la Guerra is a City and State Landmark, and it is listed with the surrounding El Paseo Complex on the National Register of Historic Places. It is a one-story adobe building yet the ODDS Zone Map shows the Land Use as Commercial-High Density Residential. It is designated for the Priority Density Housing Overlay in the Main Street Large ODDS Zone. This parcel is protected from development due to its landmark status.

813 Anacapa Street (El Paseo)

Similarly, El Paseo is indicated on the ODDS Zone Map as Neighborhood Large ODDS Zone. El Paseo is also a City and State Landmark, and it is listed on the National Register of Historic Places. Both the Main Street Large and Neighborhood Large ODDS Zones allow for residential development up to six stories. While the El Paseo parking lot at the intersection of Canon Perdido and Anacapa Streets may be

appropriate for that scale of development, the one and two-story landmarked El Paseo buildings are protected from that type of development.

126 E. Canon Perdido St. (Jimmy's Oriental Gardens) and 126 #B (Chung Residence)

Both the commercial building at 126 E. Canon Perdido Street and the duplex at 126 E. Canon Perdido Street #B are designated City of Santa Barbara Structures of Merit. The ODDS Zone Map shows both parcels designated as Neighborhood Large, possibly allowing up to six stories of residential development. It is adjacent to El Cuartel (1788) a one-story adobe that is the oldest building in Santa Barbara.

The commercial building housing the deli and bar is part of El Presidio de Santa Barbara SHP and should be shown as such (un-zoned). The parcel containing the duplex is a non-conforming parcel created when SBTHP split the lot for the sale of the commercial building to California State Parks. It is owned by SBTHP and has a condition that it can only be sold to California State Parks or be retained by SBTHP in perpetuity. It should also be shown as un-zoned as it will not be developed by SBTHP or California State Parks.

915 Santa Barbara Street (Bonilla House)

The parcel at 915 Santa Barbara Street is shown as Main Street Medium ODDS Zone. This designation allows for residential development of up to four stories. This parcel is part of El Presidio de Santa Barbara SHP and should be indicated as such (un-zoned). The Bonilla House is a City of Santa Barbara designated Structure of Merit.

215 E. Canon Perdido St. (Presidio Research Center) and 219 E. Canon Perdido St.

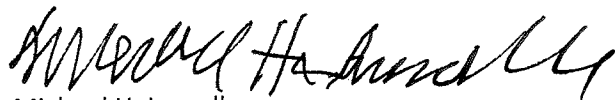
The parcels at 215 E. Canon Perdido St. and 219 Canon Perdido St. are both indicated as Main Street Medium ODDS Zone. Main Street Medium zones are allowed up to four stories for residential development. 215 E. Canon Perdido is the location of the Presidio Research Center. It is a designated City of Santa Barbara Structure of Merit. The Presidio Research Center and the one-story residential building next door at 219 E. Canon Perdido St. are both part of El Presidio de Santa Barbara SHP and should be indicated as such (un-zoned).

Thank you for the opportunity to comment. If there are any questions we can be reached at anne@sbthp.org (805) 966-5073 and archlab@sbthp.org (805) 962-2101, respectively.

Sincerely,



Anne Petersen
Executive Director



Michael H. Imwalle
Associate Executive Director for Cultural Resources

From: [Cassandra Ensberg](#)
To: [Rosie Dyste](#); [Daniel Gullett](#)
Cc: [Detty Peikert](#); [Ellen Bildsten](#)
Subject: ODS Workshop Comments to the Draft ODS Document
Date: Tuesday, December 06, 2022 10:37:21 AM

EXTERNAL

Hi Rosie & Dan (copy to other AIASB rep Detty Peikert and co- advocacy chair Ellen Bildsten)

First and foremost - thank you and the team for this great effort to hopefully bring more options for a streamlined design review and approval process.

We know that the deadline for public comment on this Draft of the Objective Design and Development Standards is December 16 and that there will be ongoing review and editing moving forward. To help the discussion and prior to our meeting later today - below are some general overview comments - some which were touched upon at the AIASB meeting yesterday.

1. A brief executive summary would help - describing SB overall and our unique challenges to development and how this document is intended to work.

2. The ZONE maps were not yet included in the document that I could find (just the graphic on the cover). Need to study and determine which types and styles are appropriate for the various neighborhoods. Also see more comment on this below

3. Is this document meant to apply to the entire city including EPV? 'Main Street Large' is listed and detailed with references to adjacent designated historic landmarks.

How does this document relate to the current ODS Spanish Style that we all created and that were adopted, and that was the impetus for the creation of these ODS to include more architectural styles to reflect the diversity and 'flavor' of neighborhoods outside the EPV?

4. Example Images should be from Santa Barbara. I have a list (and some photos) of SB examples and will send along with the addresses for consideration and will also encourage the AIASB team to provide examples.

5. Architectural TYPES and STYLES

All the architectural Types can be designed in any of the styles (given our current height limits).

-Example photos of the **types should include examples from all of the STYLES.**

-Example photos of the **styles should include examples from all of the TYPES.**

-**Main Body Massing Composition Line diagrams** should show examples of different styles also such as a flat or shed roof and not only gabled roof examples.

6. Use and benefits of the ODS

-**Craftsman and Mediterranean Styles** are historic styles that are well documented in their characteristics and this document includes key details of these styles for anyone to use.

Can the description / details of these styles be broadened to include Monterrey, Pueblo, Mission, Victorian, Italianate? Allowing 'Cross pollination' of these sub styles not unusual at all and is a way to encourage creativity.

-**The Contemporary Style** was evolved in our lifetime and continues today and includes current methods and ideas. Documentation of the Contemporary Style is limited because it cannot address something that has not yet been imagined - as designers and architects seek new ways of resolving our built environment needs. Nonetheless, the recognition and inclusion of the Contemporary Style - to the degree possible - is important and a step toward more acceptance of the Style. It is understood - a proposed design for which the case cannot be made that the design meets one of the ODS Style Standards (referencing the example of I.M. Pei's Glass Pyramid at the Louvre in Paris) would require full design review.

Either way, the details included of the various styles can be extremely helpful for professionals and non professionals alike seeking a streamlined approval process - always remembering that it is a creative process and up to the designer to design and 'make the case' for the ministerial approval. Details of the international style might also be referenced here.

7. Where Architectural Styles are allowed?

Other than EPV and other specially designated neighborhoods (like the Bungalow Neighborhood), perhaps all styles might be allowed unless there is a community desire to accentuate certain styles in certain areas like we now have for the EPV, for example.

As another example - perhaps The Funk Zone might only allow Contemporary or Industrial Styles?

8. Can the document be edited to be shorter?

- Is the information in Chapter 7 duplicative and part of a style? Craftsman houses have porches - for example.
- Is Chapter 9 for Signage necessary as part of this document?
- Is Chapter 10 for Civic Spaces necessary as part of this document?

Thank you!

Cass Ensberg

ODS Workgroup AIASB Rep.

Cassandra Ensberg FAIA, LEED AP

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From: Fred L. Sweeney AIA, fredlsweeney@gmail.com

Subject: Draft Objective Design and Development Standards (ODDS)

Date: January 2, 2023 at 2:24:23 PM PST

To: "SBDS@santabarbaraca.gov" <SBDS@SantaBarbaraCA.gov>

January 2, 2023

Subjective: Objective Design Standards Committee

For members of the Santa Barbara who are concerned about how buildings adhere to our long heritage of architectural excellence and our well-established adopted vernacular architecture there are issues that should be discussed before the proposed adoption of Objective Design Standards are completed.

1. By city charter the height of any and all buildings within the city are limited to 60 feet, not 68 feet. There are design professionals advocating for higher ceiling heights based upon the European model where only one side of a room has windows, but that is not necessarily part of the architectural language of our "punched" windows in stucco facades.
2. Because there is still "art" in architecture the adoption of ODS, like building codes, are minimum standards. They do not encourage the art of composition and other attributes of creativity. Instead, they will encourage cut and paste applications on building facades. This approach may be practiced by many. However, there may still be objective interpretations, but if practiced by administrators who do not possess the eye for proportions or the understanding of our adopted vernacular architecture the end result may be banality in what these projects may look like.
3. All architects and/or designers are not created equal. Therefore, project owners or developers may just encourage the rudimentary use of ODS's. Such an approach will depreciate the beauty, poetry, and essence for which Santa Barbara is recognized around the world. That recognition has been obtained through decades of review, collaboration, vision, and insight of the many leaders of our local community for over one hundred years.
4. If indeed if the current staff and consultant recommendations are to be adopted, then the consultant needs to edit and reduce the entire document. Just using what has been developed elsewhere by the consultant will not represent what Santa Barbara's unique architecture deserves. Such things as "carriage houses" do not apply to the majority of our towns building types. If this entire 300-page document is adopted, it opens the opportunity for an entirely new cottage industry to provide help in wading through these objective lists.
5. The essence of good architectural training is assuring that light and air are an integral part of how buildings are created and touch the ground. The technology of air conditioning cannot circumvent implementation of sustainable use of our local climate. Buildings need access to light, and air. This city's setting requires access to the view of the mountains and the ocean, otherwise we are no different than most of our other coastal cities with non-memorable edifices.

The work of this committee needs to assure the community that we will not repeat or encourage the mediocrity of architectural solutions we see in other cities.

Respectfully submitted.

Fred L. Sweeney AIA



Santa Barbara County House, Former "Jail Wing"

Would this elevation be allowed or approved under objective design guidelines. The esteem courthouse architecture is often looked at as an example how to address Spanish Colonial/Mediterranean architecture which is generally asymmetrical. Perhaps whimsical or has the poetry of Santa Barbara's architecture.



Is this the sort of edge condition between multi-family high rise (three story's or more) structures that are immediately adjacent to single family or low raise one- and two-story residences. This particularly is an issue on those neighborhoods that are located on the mountain side of downtown State Street.



An existing office building in downtown El Pueblo Viejo just one property south of the Covarrubias Adobe location. Would this represent a check off list of acceptable Objective Design Standards completed by staff? Does this represent what Santa Barbara' architectural heritage or is it representative of other town's the objective design standards provided by the consultant in another city?



PAT SALEY & ASSOCIATES

*Land Use Planning / Meeting Facilitation
Community Outreach*

January 2, 2023

Rosie Dyste
Planning Division
Community Development Department

RE: COMMENTS ON ADMINISTRATIVE DRAFT OBJECTIVE DESIGN AND DEVELOPMENT STANDARDS

Dear Ms. Dyste:

Thank you for the opportunity to comment on these standards. I recognize that this is an administrative draft that has not had the benefit of staff's thorough review and editing. I hope these comments help them in the next phases of this important process.

1. **Overall length and organization of document** – While the length and organization of the document may seem minor, they are very important. This document exceeds 300 pages in length which most people (including architects, planners and decision-makers) are likely to find unwieldy and hard to navigate. For example, the most important part, the discussion of standards for allowable architectural styles, does not start until page 168, over half-way through the document. Adding an Executive Summary and index would enhance the usability of the document, especially if it is shortened by removing repetitive material.
2. **Guiding principles** - On p. 11, the guiding principles are listed but many seem subjective and not covered in the standards. Examples include:
 - “#2, Supports a diversity of housing choices appropriate to their location”;
 - “#4, Reinforces and enhances community design and character...”; and
 - “#5, Ensures that each building plays a role in creating a better whole, not just a good building.”

What if one project with a particular architectural style is approved per the standards, and other developers adopt that same style throughout Santa Barbara because they know it meets the standards? How would that promote these three principles?

3. **Community Priority projects, maximum of 6 story buildings and City Charter height limits** – On February 15, 2022, the City Council directed that the staff amend the definition of Community Benefit to remove rental apartments. To my knowledge this amendment has not occurred, and market-rate apartments (and condos) are still considered Community Benefit projects. This concerns me as these standards give Community Benefit projects a lot of leeway to increase allowable height and reduce other requirements, while not providing a community benefit such as truly Affordable housing.

A closely related issue is that Neighborhood Large (p. 41) and Main Street Large (p. 44) zoned projects could exceed the Charter height limit of 60 feet. There have been some (controversial) projects with 5 floors within 60 feet, but six stories would clearly exceed the City Charter maximum of 60 feet. As this height limit is in the Charter, a vote of City residents would be necessary although I didn't see any mention of this in the document.

4. **Three architectural style groups** – I agree that Craftsman and Mediterranean are appropriate style groups for inclusion in the standards. I am mystified why Contemporary has been added as that seems antithetical to what Santa Barbara is about, including in areas outside the Downtown.
5. **Little mention of roof decks that are a feature of most new large projects** – As requirements for outdoor living space for each unit have been reduced to increase density, the tendency to add roof decks has increased. Roof decks can raise visual issues (e.g., blockage of views from public spaces) and privacy issues for adjacent properties. On pages 71 and 72 there is a short discussion of roof decks which seems inadequate. It appears they would only be restricted in size and features where proposed across from R-1 or R-2 zones. Also, there is no mention of whether they count as a floor, especially when partially enclosed and where buildings may be 60 feet in height or more.
6. **Protection of view corridors** - One of the things that makes Santa Barbara so special is the proximity and iconic views of the picturesque Santa Ynez Mountains from public streets and spaces. A search of the document for the phrase "view corridor" came up empty. How do these standards protect crucial public view corridors?
7. **Existing and future paseos** – Another special feature of Santa Barbara is our paseo system, an integral part of our General Plan and City's heritage. There is one page devoted to paseos (p. 247) with the focus being on the design of new paseos, with no mention of proposals adjacent to existing paseos. I suggest the paseo discussion be expanded.
8. **Proposals on Same Side of Block as Designated City Landmark or Structure of Merit.** – On page 48, the title of this section (25.03.070.B) relates to proposals that have a Landmark or Structure of Merit on the same side of the block. In my experience, when there is a significant historical resource in the immediate vicinity, such as across the street, that has been taken into consideration during the review of a project. In addition to adding "or across the street from a historic structure," those resources on the Historic Resources Inventory should be included to ensure new projects respect our architectural and cultural history.

Thank you for considering my comments.

Sincerely,

Patricia Saley, AICP

Cc: Elias Isaacson
Daniel Gullett

Public Comment #6

From: [Steve Dowty](#)
To: [Santa Barbara Design Standards](#)
Subject: Santa Barbara draft objective design and development standards, Comment Letter
Date: Monday, January 02, 2023 12:42:59 PM

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EXTERNAL

To the City Staff,

I am a licensed architect having practiced in Santa Barbara for over 40 years. Over my career I have seen a few planning programs that attempt to objectify architectural design, which is in essence a very difficult task due to the dual nature of design as science and art. While the science side can be more easily codified by deriving results from experimental and analyzed data, the art side of design is essentially subjective. It is also learned over time. It is the way architecture is taught at the university level, first as an art and second has a science.

With respect to these objective design and development standards I do generally commend the writer of the draft document by the means of employing form-based planning and 3-D diagrams (specifically the five neighborhood zones - abbreviations: N.S, NM, MS.M, N.L, MS.L). However, this does not capture the uniqueness of Santa Barbara's built environment. I suggest that there could be some actual (graphic or pictorial) examples used to address this. (E.g., from the currently drawn zone diagrams I can visualize a flat-topographical example applying, let us say, to a neighborhood in the San Fernando Valley; but not to Santa Barbara.)

I do have one specific comment for the objective design and development standards: this is with regard to the ground floor expression line for ground floor height alignment as it applies to landmark or merit buildings (fig. 25.03.070.3). Santa Barbara does have a well-distributed array of historic structures. This section addresses landmark and merit structures but does not include buildings listed on the City's Historic Resources Inventory. Per the City's Urban Historian, HRI buildings are also subject to protection. Therefore they should be added to this section of the standards.

Respectfully Yours,
Steve Dowty

Sent from my iPhone

From: [Richard Closson](#)
To: [Santa Barbara Design Standards](#)
Subject: Draft Objective Design and Development Standards (ODDS)
Date: Monday, January 02, 2023 2:24:42 PM

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EXTERNAL

There is a saying, "Writing is easy. Brevity is harder." The draft Objective Design and Development Standards and my letter are both unfortunate examples.

These draft standards expose and address an identified problem in the existing process, which is lack of clear direction with resultant delays and increased costs. However, the strict focus on lack of process objectivity - which may truly be a contributor - may not be its main flaw. Successful design standards should hold no surprises at the end of the application process due to an overlooked stipulation or misinterpreted requirement.

Subjectivity as Proxy.

It is understandable that a frustrated applicant or untoward application outcome could brand a complicated or multi-layered process as subjective. It happens all the time. The teacher didn't like me. It could as well be that the procedure steps are not clear from the outset, not instructive during the process, and not reliably predictive of an outcome. And if there is human intervention, the process could also be subjective. New standards - objective or otherwise - must address any unidentified or unexpressed failures of the current standards.

Document Size and Seeming Complexity.

The standards laid out in this draft - without addition of a revised schematic or summary to guide an applicant - are challenging in their repetition and precision. This is an understandable attempt to be comprehensive.

Human beings will be using these standards, on both sides of the counter. Or am I thinking too short term? Perhaps it is planned to fit also some future system where projects might be approved at an early level by a binary process. Does the project comply with each stepped standard or not? Next.

In your review and evaluation of new standards – if what we see now is the “under the hood” view, i.e., infrastructure, of the process – then you probably also should consider the outer human interface. In your place, I would drop a quarter in the slot and see how the machine makes the music come out.

I do not believe a final objective review system close to this draft will find more public (applicant) favor than the current disliked system. Yes, the new one may be objective, but it will not be appreciated as clearer, more instructive, or (importantly) predictive of outcomes for applicants.

Adequate End-User Review.

Here is a corollary to the issue of user-friendliness. This drafting process must have ample input from the applicant-class that will use it. These are the interested parties who have complained the current process impedes development, specifically the tender spot of affordable housing. They must be satisfied with a reasonable and balanced outcome. On the flipside, if the standards are too generous or solicitous of developer interests, the rest of us will complain.

Past City staff efforts at collecting public comment have been marred by a lack of rigor. They have relied on self-selected respondents - similar to this call for public input - and have been rightly vulnerable to later criticism for their small sample size and lack of diversity or user-focus. Please guard against those failures in this process.

Document Images.

The initial Note to Reviewers states the draft ODDS are a first submittal by the consultant and have not been edited by City staff. As part of the staff editing process, I hope many of the stock Opticos Design, Inc. images are replaced with local images. Examples early in the document that illustrate general concepts of Form-Based Code can be acceptable – even essential - in their blocky design. Later in the document, as examples apply specifically to Santa Barbara, every effort must be made to insert images of best-practice examples found locally. I call your attention particularly (but not exclusively) to early pages 71, 79, 82, 87, 99, 107, 112, 117, and onward. Some of which might already be local examples, as on pp. 91, 103, 121, 125 (mixed). I appreciate the occasional note that photos are illustrative, not regulatory.

I fear the intermixing of fine local examples and stock photos from elsewhere does not provide sufficient guidance to applicants. Architectural renderings displaying dimensions for code compliance are acceptable. In places within the document, staff might also find opportunities to include both, i.e., an architectural rendering for clarity and a photo example of the local expression. I have long admired the Buffalo Architecture and History Illustrated Dictionaries (see example: <https://buffaloah.com/a/DCTNRY/vocab.html>) and believe Santa Barbara architecture images could populate a similar effort. Some stock images in the draft might have been supplied from other Opticos Design, Inc. projects, originally to import distinctive identity and character to those other client city projects. Santa Barbara already has those attributes. Ours should be incorporated into the document wherever possible and appropriate.

View Corridors.

As early as the 19th century (maybe earlier), view corridors have been an important Santa Barbara amenity. Renowned architect Arthur Page Brown designed 5 homes built on Garden Street in 1894 that became known as “Crocker Row” after their owner, banker William H. Crocker. The home closest to the ocean down Garden Street (2010) was constructed with a substantial set back from the street – with slightly less setback for every successive home – so the front of each would have some ocean view (now gone due to subsequent neighborhood development). More

recent projects, such as the now-Hilton Santa Barbara Beachfront Resort on Cabrillo Boulevard, were carefully designed to maintain view corridors toward the mountains from Chase Palm Park. Such has been the importance of view corridors. I don't believe the draft ODDS mentions consideration or maintenance of view corridors. It should.

Subjective (there's that word, again) inclusion of light and air access have been part of architectural design for possibly centuries and now are an accepted standard, included in building codes. The specific importance of solar access is recognized in Santa Barbara's Municipal Code (Ch. 28.11 et seq., 30.140 et seq.) and incorporated into this draft ODDS (Ch. 3 §25.03.080). The importance of maintaining "view access" (view corridors) deserves to be part of this document.

Building Heights.

I am bothered by the predominant use of story heights, rather than foot heights in stated overall building limits. With the recent - and expected future - emphasis on smaller living units, applicants have pressed the desire (couched almost as a human "need") for higher ceiling heights in the name of livability. Cynically, I can foresee applicant pressures for higher building heights to allow taller plate heights that would fit within allowable story heights.

In addition, the draft ODDS already states allowable eave/parapet and overall heights for Community Benefit projects (p. 40) in excess of the sixty-foot limit established by the City Charter (Sec. 1506) and by Municipal Code (§30.140.100). Plus, I feel there is ambiguity about rooftop "permanent shade devices," i.e., structures on roof decks, (p. 71) and whether their height must fall within overall building limitations.

This review process may be a generational opportunity to produce an enduring document. Get it right. No one wants a new system based on an involved, expensive revision process to result in continued public criticism - maybe different in content specifics, but equal in frequency and negative fervor.

Regards,
Richard Closson, Pharm.D.
3308 Calle Fresno ([Google Map](#))
Santa Barbara, CA 93105-2605
Cell (voice & text) 805.202.6535

Public Comment #8

From: [Richard Closson](#)
To: [Santa Barbara Design Standards](#)
Subject: Re: Draft Objective Design and Development Standards (ODDS)
Date: Tuesday, January 03, 2023 12:00:37 PM
Attachments: [2006.PaseoPlanMap.SantaBarbara.pdf](#)
[ATT00001.htm](#)
[2009.05.14.EPV.Guidelines.Paseos_map.portr.pdf](#)
[ATT00002.htm](#)

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EXTERNAL

I acknowledge and apologize for the lateness of this additional submission, coming even after the generous deadline extension from December. I will understand if it is absolutely too late and will submit at a later round of public comment.

I realize I omitted from my earlier submission, mention of a feature that is an important part of the “nature of Santa Barbara.”

Paseos.

A typical feature of historic Hispanic towns and cities, paseos are also an important feature of Santa Barbara’s ambience. I believe paseos have not been given sufficient consideration in the ODDS. The City’s current system of paseos dates to our post-earthquake rebuilding, according to the [Pedestrian Master Plan](#), but paseos were prominent even before the earthquake due to the square nature of our 1853 Salisbury Haley block grid system. Unlike many cities of the time, there were no short sides on the platted Santa Barbara blocks and informal pedestrian shortcuts, i.e., paseos, were created.

The City has acknowledged the importance of paseos in prior documents.

- In 2006, the City produced a Paseos Plan map (attached).
- A different Downtown Paseos map is part (pg. 40) of the [2009 El Pueblo Viejo Design Guidelines](#) (attached).
- The [2011 Circulation Element](#) of the City Master Plan also mentions the importance of pedestrian walkways.

Please include more consideration for the addition, maintenance, and improvement of paseos in the ODDS.

Regards,
Richard Closson, Pharm.D.
3308 Calle Fresno ([Google Map](#))
Santa Barbara, CA 93105-2605
Cell (voice & text) 805.202.6535

Paseos Plan

Map VII-1 Overview Map



State Street connects Paseos



Pavement markers show the way



Mid-block crossing

Arlington Theater

Karpeles Manuscript Library

Bus Station

Public Library

Court House

Lobero Theater

Post Office

City Hall

Peabody Stadium

Peabody Stadium

Peabody Stadium

Peabody Stadium

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Outdoor dining along Paseo



Paseo turns plaza



Access to office & residential



Paseos as a part of retail complex



Difficult to find entrances



Ample landscaping & comfortable widths



Connections at back of buildings



Some Paseos need improvements

Amtrak Station



Legend

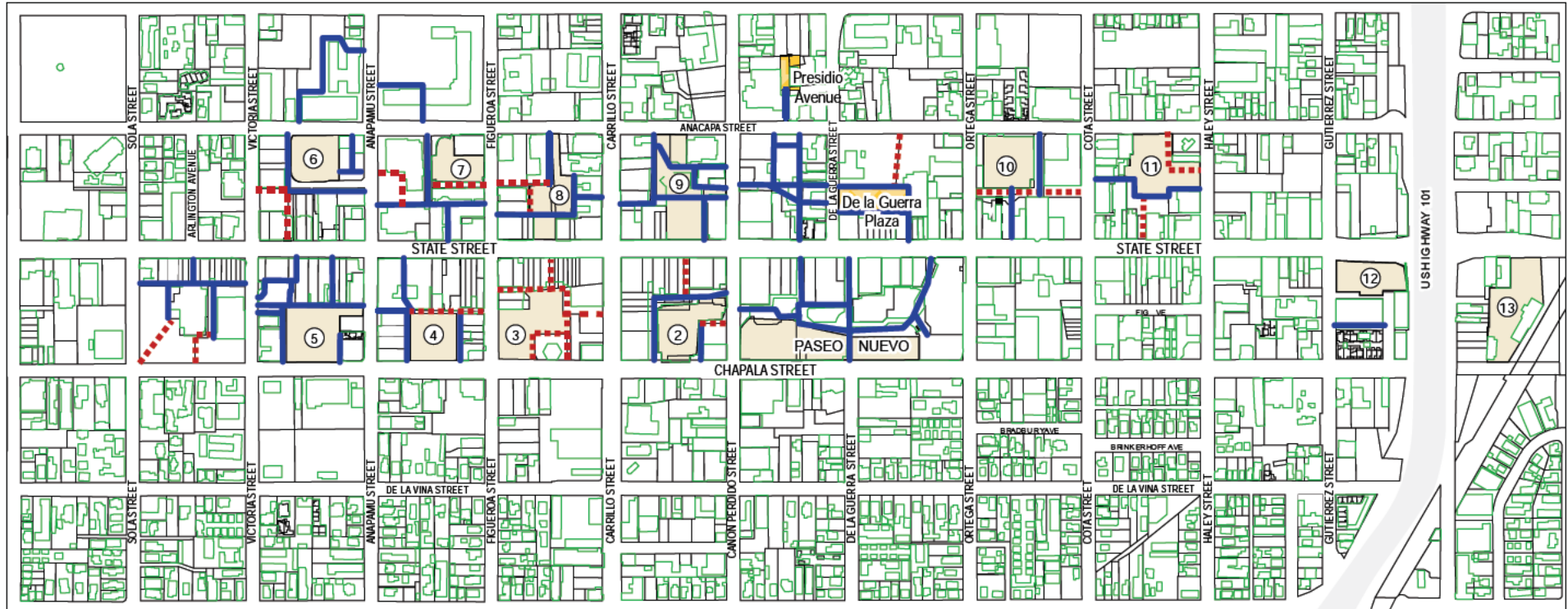
- Existing Pedestrian Crossings
- Existing Public Parking
- Existing Parks
- Existing Plazas
- Existing Paseos



CITY OF SANTA BARBARA

March 21, 2005





Legend

- Existing Paseos
- - - Paseo Opportunities Identified in Paseo Plan
- # City Public Parking Lots and Garages
- Plazas
- Downtown Building Lines

*All city public parking lots and garages are named and numbered. The designated number for each lot and garage is shown on the map.

City of Santa Barbara DOWNTOWN PASEOS



Revised: May 14, 2009

January 10, 2023

From: American Institute of Architects, Santa Barbara (AIASB)
ODS Workgroup Representatives Detty Peikert AIA & Cassandra Ensberg FAIA
To: City Long Range Planning & Workgroup for Objective Design and Development
Standards (ODS)
Attn: Rosie Dyste, City of SB Project Planner

Re: In – Progress AIASB Comments to Draft ODS Document dated October 7, 2022

Thank you for this important work and for the opportunity to participate and offer input to this new ODS Document.

Background

Cassandra Ensberg and Detty Peikert volunteered to participate and represent the membership of AIASB on the City of Santa Barbara Objective Design and Development Standards (ODS) Workgroup. Several meetings of the workgroup were held over the past year.

This current ODS effort evolved as a follow-up to the Spanish Style ODS created and adopted for multi-unit housing and mixed-use development in response to new state laws created to expedite approval and construction of housing. Key goals of the California Laws are to expedite housing projects by simplifying design review. ODS Ministerial design review is allowed for certain kinds of housing projects only if municipalities have created and adopted them. After Santa Barbara created and adopted the Spanish Style ODS, the city recognized that the community is also uniquely characterized by other important Architectural Styles that needed ODS to be included as options for an expedited process. We believe that creating these additional ODS is the primary purpose of the current work.

On December 6 the work group met to review the most recent ODS draft. Following that meeting and after further review and consideration of the draft, we offer the following overview comments and suggestions:

Simplify proposed ODS Document

The ODS Draft Document in its current form is just over 300 pages. We believe the document is significantly longer and more complicated than needed to meet the goal of a Ministerial ODS document to include styles beyond the Spanish Style. We believe the document should be easy to understand and use, expedite design approval, help preserve the city's character, and meet State Law.

The ODS Draft Document is written as a Form Based Code. We believe, as such, would require replacing or somehow superseding the city's New Zoning Ordinance (NZO) Title 30. We are not clear if that was the intent since the city is mostly built out with well-established neighborhoods and only recently went through extensive work to carefully craft, in great detail, the zoning and specific development standards for multi-unit housing throughout the City of Santa Barbara. We believe that a simple ODS document that includes aesthetic requirements for additional architectural style options is what is needed to work with our existing Zoning Ordinance.

We suggest a simple ODS document with primary focus on the descriptions and details of:
1. Included Architectural Styles, 2. Building Types, 3. Neighborhood Characteristics, and 4. where the Architectural Styles can be used under these ODS. Exemplary Santa Barbara images should be used to illustrate examples of the Architectural Styles, Neighborhood

Descriptions, and Building Types. Requirements for parking, setbacks, building heights, open space, building configuration, mass, bulk, scale etc. would continue to be regulated by the existing zoning ordinance (NZO).

We believe that the consultants draft document can be successfully edited into a simplified ODS document that works with Santa Barbara's existing NZO. Any desirable design standards from the draft document that are not already in the NZO could be added in the next Zoning Ordinance update.

To communicate our 'big picture' suggestions, we have copied the Table of Contents from the Draft ODS Document and included our general comments for each. At the end we have provided a proposed revised Table of Contents for consideration based upon our suggestions. Once we are resolved about the contents of the overall document, the many details can be studied.

As part of this ongoing work, these comments and suggestions are in-process of review and further input by other AIASB Members.

Chapter 1 Introduction

- Change Chapter Name to INTRODUCTION and PURPOSE
- Edit and add an Executive Summary / Preamble describing the city of SB History, character overall and challenges especially as related to the Housing Element and the design review process set out by the City Charter.
- Include Purpose of ODS and describe alternative processing routes to the ODS

Chapter 2 Establishment of Zones

- Change Chapter name to SANTA BARBARA ZONES
- Include statement that the city's existing New Zoning Ordinance (NZO) regulates Gross Size, Bulk, & Scale through requirements for height, Setbacks, Open Yard, Parking, and Screening, Landscaping, Lighting, etc. The Architectural Style will also influence ultimate size and will help address neighborhood compatibility. As noted above, through this process, any zoning improvements or clarifications can be identified and included in the NZO.
- Refer to the City of SB NZO Include Link
- Include Zone Map detailed to include:
 1. Neighborhood Name
 2. Neighborhood General Description
 3. Photos to show general character of neighborhood
 4. The Architectural Styles allowed in each neighborhood under the ODS

Chapter 3 Zones

- Delete as a separate chapter - merge / Include all info about Zoning in one chapter

Chapter 4 Specific to Uses

- Delete this as a separate Chapter and include under the Zoning Chapter

Chapter 5 General Design Site Standards

- Delete this as a separate Chapter, include any appropriate references in Zoning Chapter

Chapter 6 Specific to Building Types

- Change Chapter name to BUILDING TYPES

- Include statement to clarify that BUILDING TYPES represent typical configurations of multi unit residential structures (minimum of 2 units) and that each TYPE can be manifest in any of the Architectural STYLES
- Simplify this chapter by including one or two pages only for each BUILDING TYPE including:
 1. General Description,
 2. Number of units
 3. SB Photo example images to illustrate the BUILDING TYPE in each of the ARCHITECTURAL STYLES.
- These documents are for Multi-Unit Housing. The Carriage House may not be appropriate for inclusion since it is limited to a maximum of one unit - covered in the ADU Ordinance
- Delete information about body massing, indication of roof design, or position on the site. This is duplicative covered either in the NZO or under ARCHITECTURAL STYLES Chapter.

Chapter 7 Specific to Private Frontage Types

- Delete this as a separate chapter – All of this information is specific to and included in the NZO and in the ARCHITECTURAL STYLES Chapter.

Chapter 8 Specific to Architectural Design

- Change Chapter name to ARCHITECTURAL STYLES
- The Architectural Styles Include Classic SB Architectural Styles as follows:
General Note: An idea is to include the description and example characteristics of 'simpatico' styles ie 'Spanish, Mediterranean, Mission, Pueblo, Monterrey' together as one style category to allow and encourage creativity as we historically see in these styles and great architecture.
 1. Spanish, Mediterranean, Mission, Pueblo, Monterrey
Note: How will this document work with the (E) ODS for Spanish Style? Is it possible that these other 'simpatico' styles be included in an updated version of the (E)?
 2. Craftsman, Cottage, Victorian, Italianate
 3. Contemporary, International Style
 4. Industrial
- SB Photo Images of each style and it's variations
- A description of each style and its variations
- Desired details / graphics of each style and its variations for reference
- Design Approval Checklist for each style and it's Variations with only the key important details that are essential for the style

Chapter 9 Specific to Signage Types

- Delete this as a Chapter – include reference and link to Sign Ordinance and separate required approvals for signage in References Chapter.

Chapter 10 Specific to Civic Spaces

- Delete this Chapter – include reference to these elements in the Introduction and References Chapters

Chapter 11 Exemptions

- Change Chapter Name to REFERENCES
- Put this Chapter up towards the beginning of the document
- Include what projects these ODS apply to and what projects this does not apply to – the word ‘exemptions’ does not seem to be applicable.
- Include explanation that the ODS are meant as a streamlined path if the designer / developer wants to work with one of the ODS Architectural Styles. It should be clear that other styles can be pursued for review and approval through the normal full review process
- Include SIGNAGE note here and a link to the Sign Ordinance

Chapter 12 Definitions

- A good many of the definitions are not applicable for this simplified document. Revise as appropriate

Chapter X ODS Process & Checklist Forms

- Add this chapter
- Include description of the ODS process
- Include ODS Checklist Requirements Form.

REVISED TOC DRAFT ODS DOCUMENT

CHAPTER 1 INTRODUCTION & PURPOSE

CHAPTER 2 REFERENCES

CHAPTER 3 SANTA BARBARA ZONES

CHAPTER 4 BUILDING TYPES

CHAPTER 5 ARCHITECTURAL STYLES

CHAPTER 6 DEFINITIONS

CHAPTER 7 PROCESS & CHECKLIST FORMS

END