

April 4, 2022

Kathleen Kennedy  
City of Santa Barbara  
Community Development, Planning Division  
630 Garden Street  
Santa Barbara CA 93101

By Email: [KKennedy@SantaBarbaraCA.gov](mailto:KKennedy@SantaBarbaraCA.gov)

**Re: Santa Barbara County Air Pollution Control District Incompleteness Items for 101 Garden Hotel, PLN2019-00052**

Dear Kathleen Kennedy:

The Santa Barbara County Air Pollution Control District (District) has reviewed the referenced project, which consists of a new 250-room, 261,139 gross square foot (SF) hotel, 233 subterranean parking spaces and 33 spaces at grade, and onsite amenities including a media salon, guest laundry facility, restaurant, bar, mini market, lounge, library, meeting rooms, fitness rooms, and a rooftop deck. The hotel is expected to employ approximately 60 workers. The project includes 25,500 cubic yards (CY) of cut, 0 CY fill, and 25,500 CY of export. Five existing structures totaling 15,200 SF will be demolished. The project requires Planning Commission approval of a Coastal Development Permit and Development Plan. The subject property, a 4.53-acre parcel zoned HRC-2/SP-2/S-D-3 and identified in the Assessor Parcel Map Book as APNs 017-630-008, 009, 018, 021, 024, and 027, is located at 101 Garden Street in the City of Santa Barbara.

**The District finds the application to be incomplete and requires more information about the proposed project to determine potential air quality impacts, appropriate permit conditions for the proposed land use, and applicability of District permit requirements, prohibitory rules, and other regulatory programs.**

Please provide responses to the following items:

1. Please describe any **proposed combustion equipment** that will be installed and/or operated onsite to support the proposed project. This could include large water heaters, boilers, and emergency generators to supply power to equipment, facilities, or operations. For all proposed combustion equipment, provide the sizing such as Btu rating or horsepower, fuel type, anticipated hours of usage, amount of fuel used, and manufacturer specifications.
2. Please provide a project-specific **traffic study** and/or **trip generation report**.
3. An **Air Quality and Greenhouse Gas Technical Report** should be prepared for the project. The report should quantify criteria pollutants and greenhouse gases emissions from all project phases (construction and operational) and from all potential emission sources associated with

Aeron Arlin Genet, Air Pollution Control Officer

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the proposed project, including but not limited to, emissions from mobile sources, permitted and unpermitted combustion equipment (boilers and heaters), and indirect greenhouse gas emissions from electricity use, water use, and waste disposal. The trip rates from the project-specific traffic study or trip generation report should be utilized when estimating the project's mobile source emissions.

The Air Quality and Greenhouse Gas Technical Report should include a summary table that compares the project's emission sources (stationary, mobile, direct and indirect, as appropriate) to CEQA significance thresholds being applied to the project. The report should include an analysis of all potential air quality impacts for which the city applies significance criteria, e.g. dust, odors, health risk, etc.).

Once the necessary information is provided and reviewed for completeness, the District will submit a departmental condition letter for the project. Please ensure that all applicable District conditions are included with the Conditions of Approval for the project.

District staff has the following initial advisories on the project:

1. **CEQA Requirements/Environmental Analysis:** If the proposed project involves the installation and operation of equipment that would require an air district permit (e.g., for a boiler, engines for power generation, engines for water pumping, et cetera), then the District would be acting as a Responsible Agency under the California Environmental Quality Act (CEQA) and would rely on the project's environmental analysis when evaluating any District permits for proposed equipment. However, the project description does not contain enough information for District staff to determine whether this project will require any District permits and thus, whether the District is a Responsible Agency for this project.

If a District permit is required for any project equipment or operations, the project's environmental analysis should include the air pollutant emissions for all proposed equipment and activities to avoid additional CEQA documentation requirements related to District permit issuance.

2. **Health Risk:** If a District permit is required for any project equipment or operations that have the potential to emit toxic or hazardous air pollutants, as part of District permit issuance, the project may be required to prepare a Health Risk Assessment to determine the potential level of risk associated with proposed operations. Whenever an HRA is required, the District recommends including the results in the CEQA document to ensure that project-related equipment will not result in a significant impact.
3. **Contaminated Soils:** If contaminated soils are found at the project site, the District must be contacted to determine if Authority to Construct and/or Permit to Operate permits will be required. District permits are required for all soil vapor extraction activities. District permits are also required for the excavation ("dig-and-haul") of more than 1,000 cubic yards of contaminated soil.

If you or the project applicant have any questions regarding these comments, please feel free to contact me at 805-979-8336 or via email at [hamiltont@sbcapcd.org](mailto:hamiltont@sbcapcd.org).

*District Incompleteness Items on PLN2019-00052, 101 Garden Hotel*

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Sincerely,

*Ted Hamilton*

Ted Hamilton  
Air Quality Specialist  
Planning Division

cc: Planning Chron File