

## MEMORANDUM

---

**To:** Ted Hamilton, Santa Barbara County Air Pollution Control District  
**From:** Carolyn Groves, Dudek  
**Subject:** Response to APCD Comments for 101 Garden Street Hotel (PLN2019-00052)  
**Date:** October 6, 2022  
**cc:** Kathleen Kennedy, City of Santa Barbara Planning Division  
**Attachment(s):** CalEEMod Output Excel Files

---

Dudek is pleased to submit this information to the Santa Barbara County Air Pollution Control District (APCD) for the proposed 101 Garden Street Hotel Project (Project; PLN2019-00052). As part of the City of Santa Barbara (City) Land Development Team (LDT) review process initiated on November 23, 2021, the APCD reviewed preliminary plans and technical studies associated with the Project and issued a comment letter on April 4, 2022. The APCD also reviewed a project-specific Air Quality and Greenhouse Gas Technical Memorandum (AQ/GHG Memo) and e-mailed case planner Kathleen Kennedy on October 4, 2022 with additional questions. This memorandum is intended to address the items in the 4/4/22 letter as well as the 10/4/22 email, and facilitate APCD review.

### Incompleteness Items

1. **Proposed Combustion Equipment.** There is no combustion equipment proposed to be used as part of the Project.
2. **Traffic Study.** A preliminary traffic study was conducted by the City in 2019 using ITE rates for resort hotel land uses. Below is an excerpt from the LDT comment letter dated 12/15/2021 summarizing the City's findings. Because the proposed Project did not result in a significant project-specific traffic impact, no further traffic studies were conducted.

During the initial Pre-Application Review, the City conducted driveway counts at the three existing driveways on February 20th & 21st, 2019 in order to establish an accurate baseline for existing trips entering and exiting the project site. Driveway counts were used instead of applying Santa Barbara Traffic Model rates because of the unique characteristics of the site and not having a clear picture of the total square footages or uses of the existing buildings.

Staff compared the driveway counts for the existing AM and PM peak hours with both the Santa Barbara Traffic Model rates for "Lodging" land uses, as well as the Institute of Traffic Engineers (ITE) rates for the Resort Hotel Land Uses to determine the project's net new trips. ITE rates for Resort Hotel land uses are significantly higher than the lodging rates for the City's Traffic Model, and therefore, staff wanted to examine conservatively high rates to see what the "worst case scenario" could be. Using the City's Lodging rate, there would be a net reduction of trips with the proposed project. Using ITE's Resort Hotel rate would result in 7 AM and 64 PM net new peak hour trips.

Staff conducted a trip distribution analysis, comparing the difference of existing “entering” and “exiting” trips to the site with ITE Resort Hotel percentages for entering and exiting trips. Once distributed, staff determined that the number of trips that would go through the nearest existing or future 2030 impacted intersections (Garden Street and Highway 101 ramps, and Garden and Gutierrez Streets), would not use one percent or more of the intersection capacity. Therefore, the proposal would not result in a significant project specific traffic impact.

A considerable project contribution to cumulative traffic effects is identified when a project’s net peak-hour traffic together with other cumulative traffic from existing and reasonably foreseeable projects would cause an intersection to exceed 0.77 V/C; or when the project would contribute peak-hour traffic to an intersection already exceeding 0.77 V/C. The program EIR for the 2011 General Plan provided a citywide cumulative traffic analysis to the year 2030 using this threshold. This project is within the grown assumptions of the EIR analysis and is considered to incrementally contribute to the cumulative effects identified in the Program EIR.

3. **Air Quality and Greenhouse Gas Technical Report.** The AQ/GHG Memo was completed by Dudek on September 15, 2022 and submitted to the City and APCD on September 16, 2022.
4. **CalEEMod Excel Files.** Please find attached with this submittal three excel files with the annual, summer, and winter CalEEMod outputs used for the Project.
5. **Greenhouse Gas Threshold of Significance.** The 10,000 MT CO<sub>2</sub>e threshold is the standard threshold used regularly by the City in their CEQA analyses. This threshold is consistent with the City Climate Action Plan (2012) and the General Plan Program EIR Addendum (2012), as well as the growth assumptions of the Plan Santa Barbara General Plan (2011).
6. **Mobile Trips.** Please see above item 2.
7. **Emissions Reduction Measures.** The recommended emissions reduction measures are acknowledged as a condition of approval.