



APPLICATION COMPLETENESS REVIEW, SUBMITTAL # 1

June 19, 2025

Dave Eadie
Kennedy Wilson
deadie@kennedywilson.com

SUBJECT: 3845 State Street, PLN2025-00238, APN: 051-010-007 & -008

STATUS: APPLICATION INCOMPLETE

Dear Mr. Eadie:

The City accepted this Planning Application submittal for review on May 20, 2025. The Land Development Team has reviewed your submittal and has the following comments.

I. PROJECT DESCRIPTION

Your project application proposes a new multi-unit development and Tentative Parcel Map. Per the application materials, the scope of work includes demolition of two existing commercial structures (former Sears store and auto center) and surrounding parking areas located at 3845 State Street (a portion of La Cumbre Plaza) and construction of a 443-unit rental housing development under the City's Average Unit-Size Density (AUD) Incentive Program and SB 330. Existing wireless facilities on the site are proposed to be removed and uses discontinued. A Tentative Parcel Map is proposed to divide the 14.19 net acre legal lot into two parcels, creating a 9.39 net acre site for the new development while the existing shopping mall development would remain on the other parcel. The project would include 31 studio, 189 one-bedroom, 200 two-bedroom, and 23 three-bedroom units in two four-story buildings. A total of 477 vehicle parking spaces in a combination of surface, tuck under, and structured parking would be provided; 11 spaces would be provided to serve existing La Cumbre Plaza commercial uses; and 443 bicycle parking spaces would be provided. The project also includes an approximately 10,000 square foot, one-story leasing and amenities building and courtyards and other common outdoor areas provide open yard areas for residents. Sidewalks and improvements to existing access points and a multiuse path on the eastern side of the property along Arroyo Burro Creek are proposed. Site grading in the amount of approximately 46,500 cubic yards of cut and approximately 4,600 cubic yards of fill are proposed. The project is proposed to be constructed in two phases.

The project site is zoned C-G/USS (Commercial General/Upper State Street Area Overlay). The project site has a General Plan Land Use Plan designation of Commercial/High Density Residential (28-36 du/ac) and Priority Housing Overlay (37-63 du/ac) on a majority of the site,

and Commercial/Medium High Density Residential (15-27 du/ac) on the portion of the site within the 250-foot buffer of Highway 101.

II. STAFF FEEDBACK

The project proposes a multi-family residential development that includes amenities, including outdoor areas, for residents and a multiuse path along Arroyo Burro Creek. The project would add a substantial amount of needed housing to the City's housing stock at a location identified by the City's General Plan for the highest residential densities in the City. While staff finds the overall use appropriate, additional information is needed to demonstrate consistency with applicable standards and how the project will integrate with the surrounding area as part of the commercial and residential village envisioned for the redevelopment of La Cumbre Plaza in the General Plan and address circulation needs identified in the Upper State Street Area Design Guidelines.

III. APPLICANT MEETING DATE

A virtual meeting has been scheduled via Microsoft Teams with the Land Development Team staff who reviewed your application on **Wednesday, June 25, 2025 at 10:30 a.m.** This meeting offers an opportunity to discuss and clarify any comments provided. If you do not feel the meeting is necessary, or need to reschedule, please let me know. Otherwise, we will assume you plan to attend the virtual meeting. ([Click Here to Join the Meeting](#))

IV. PLANNING ENTITLEMENTS REQUIRED

Below are the Planning entitlements needed for your project as it is currently designed. If you choose to redesign the project to remove any of these entitlements, please make sure to mention that on your Resubmittal Form.

1. **Tentative Subdivision Map.** Review by Staff Hearing Officer (SHO) for a Tentative Subdivision Map pursuant to SBMC Title 27 is required to allow the division of one parcel into two lots.
2. **Design Review.** Review by the Architectural Board of Review (ABR) is required per SBMC §22.68.020.

V. FINDINGS REQUIRED

To approve the requested Planning entitlements, the decision-makers must be able to make the required findings of approval. To support this, your application's plans, figures, technical studies, and narrative should clearly demonstrate how the project satisfies each of the findings. For your reference, the full text of the required findings is provided in Appendix A of this letter.

VI. REQUIRED ADDITIONAL INFORMATION

At this time, your application is considered “incomplete.”¹ To move forward with reviewing your proposed project, we’ll need the information listed below. The items listed as “REQUIRED” must be provided to complete your application. The application will be placed on hold until we receive the required information. Items listed as “ADVISORY” are not required at this time; however, they may be needed later in the process or could influence the level of staff support for your project. For this reason, we strongly recommend addressing advisory items as early as possible to help prevent potential delays or complications. If you have any questions about what’s needed, feel free to reach out to me or the relevant City staff listed.

A. Planning Review – Planning Division

Staff Contact: Patsy Price, PPrice@SantaBarbaraCA.gov ; (805) 564 - 5470 Ext. 4582

REQUIRED ITEMS:

1. **Average Unit-Size Density Calculations.** Provide separate average unit size density calculations for those portions of the project in the High Density/Priority Housing Overlay and Medium-High Density areas of the site, respectively. Although average unit size is not provided, based on the density summary for the 250’ setback area (i.e., Medium-High Density area) on sheet A03, it appears the proposed density of 29.45 du/ac exceeds the maximum density of 27 du/ac allowed by the Medium-High Density tier pursuant to the AUD Program (see SBMC §30.150.160, Exhibit B).

Add the boundary line between the High Density/Priority Housing Overlay and Medium-High Density Residential areas to the site plan and south building level plans so average unit size density calculations for each area can be verified against project plans.

Note that in calculating density, pursuant to the version of SBMC §30.15.050 effective as of the preliminary application submittal date for your project,² calculations shall use fractions no smaller than hundredths and if the end result of a calculation contains a fraction of a whole number, the results shall be rounded down to the nearest whole number.

The North Building Unit Summary Table on sheet A16 lists the net area of the B4 unit type as 949 sf, but the unit plans on sheet A18 show it as 1,016 sf. Please correct this discrepancy and update average unit size density calculations accordingly.

2. **Nonresidential Growth Management Program (GMP).** Because existing nonresidential development that is demolished can be used for future

¹ You may appeal the decision to require additional information. An appeal must be filed at the Community Development Department’s Planning Counter within 10 calendar days of the date of this letter. The appeal must consist of written notification indicating your grievance with the determination that your application is “incomplete” and the appropriate appeal fee. The appeal will be scheduled for review by the Planning Commission, and you will receive notice of the hearing date.

² SBMC Chapter 30.15 was amended on February 25, 2025. However, the amendments are not applicable to your application pursuant to SB 330.

development (“demo credit”) on the same site or transferred for development elsewhere pursuant to the GMP (SBMC Ch. 30.170), it is important for all applications to accurately track existing nonresidential square footage to remain, to be demolished, and to be constructed. List the existing nonresidential square footage to remain, to be demolished, and to be constructed in the project data on sheet A03.

The response to PRT comments indicates existing permitted nonresidential square footage was not available for the site in City street files and archived plans, yet the existing permitted nonresidential square footage on the project site is identified as 149,827 gross/net square feet. Please indicate how the existing gross and net square footages were determined. Please also confirm the gross and net floor area are consistent with the definitions in SBMC §30.15.070.

Any demo credit associated with the project will also need to be assigned to one or both of the proposed lots as part of the subdivision.

3. **Site and Area Photographs.** Please provide the following additional photos of the areas surrounding the project site:
 - a. Development on the west side of La Cumbre Road,
 - b. Development on the east side of La Cumbre Road north of the project site,
 - c. Development east of Arroyo Burro Creek, and
 - d. Views of the southern boundary of the site toward Calle Real and Highway 101.
4. **Visual Aids & Story Pole Exemption.** While staff generally supports the proposed story pole exemption request, additional visual aids are needed to show features of adjacent sites in sufficient detail to demonstrate the relationship between the proposed development and its surroundings and for staff and ABR to determine if the story pole exemption can be approved. The following additional or revised visual aids are required:
 - a. **Expanded Elevations.** Expand the site elevations or provide additional elevations that include the nearest buildings adjacent to or across South La Cumbre Road and Arroyo Burro Creek from the project site.
 - b. **Site Sections.** As requested by the ABR and Planning Commission during pre-application review, provide site sections including the project site, the complete width of Calle Real and Highway 101, and adjacent mall structures. Include all proposed walls and fences in sections and depict existing and proposed grade.
 - c. **3D Renderings or Streetscape Views.** Provide 3D renderings or streetscape views of the following additional or expanded areas:
 - i. From South La Cumbre Road toward looking east and including the project site and buildings to the north to at least La Cumbre Plaza Lane.

- ii. From the La Cumbre Plaza parking lot looking south toward the development site.
 - iii. From the eastern La Cumbre Plaza parking lot looking toward the project site and including the proposed development and the adjacent mall structures.
- 5. **Phasing Plan.** Provide a site plan depicting which portions of the development would be constructed in each phase, if constructed in phases. Provide additional details regarding proposed phasing including the number of market-rate and inclusionary units that would be constructed in each phase and which portions of landscaping and open yard areas would be completed in each phase. Also see Transportation Division comments regarding making the multiuse path along Arroyo Burro Creek accessible to Phase 1 residents during Phase 2 construction.
- 6. **Plan Edits.** The project plans are insufficient. All plans must be complete, accurate, legible, and to scale. The following edits to the project plans are required. See the [Project Plan Submittal Guide](#) for additional guidance.
 - a. **Parking.**
 - i. The number of vehicle parking spaces shown on the plans is inconsistent with the number of spaces reported in the project description and in summary tables on sheets A03, A16, and A21. Please resolve.
 - ii. Number each parking space on the project plans and label compact spaces.
 - iii. The information regarding required and proposed bicycle parking in the plans is internally inconsistent. Update the plans, including sheets L0.00, A16, and A21 for consistency. Per SBMC §30.150.090.F.4, one covered and secured (i.e., long-term) space is required for each residential unit. Additional short-term bicycle parking is also strongly encouraged in the vicinity of common areas and the multiuse trail.
 - iv. Sheet C03 shows 15 existing vehicle parking spaces that cross the proposed property line between APN 051-010-007 and -008 (i.e., Lots 1 and 2 of the Tentative Map). Sheet C04 appears to eliminate these spaces but does not indicate what physical improvements are proposed for the area with partial spaces remaining when the parcels are split and APN 051-010-008 is improved. Please clarify on the plans whether the spaces are proposed to be eliminated and what physical improvements are proposed for the partial parking spaces, such as converting the area to landscaping. They cannot remain as partial/undersized spaces adjacent to the new improvements. Also see Transportation comments regarding the parking studies.
 - b. **Height.** Provide a warped plane exhibit demonstrating compliance with the 45-foot building height limit pursuant to SBMC §30.15.090. Building height is measured from every point on top of the proposed building roof or roof parapet to a warped plane directly below connecting all points

where the existing or finished grade, whichever is lower, contacts the proposed exterior building walls or foundation system. To determine the theoretical existing grade within the existing building footprint, the same methodology should be applied. That is, the warped plane created by connecting all points where the existing exterior building walls or foundation system contact the existing grade represents the theoretical existing grade within the building footprint for purposes of determining allowable building height. This means that areas of the Sears building that are contiguous with the existing mall, where the existing grade is lower, the maximum height of structures would be lower than on areas of the site where the existing grade adjacent to the Sears building is higher. Plans should show the height of all proposed buildings and walls, including architectural projections.

c. **Title Sheet – Project Data.**

- i. Include the required and proposed setback, height, lot coverage, and open yard area; and the existing and proposed average property slope on sheet A03.
- ii. Indicate the proposed units are rental units and identify the number of moderate-income inclusionary units and market-rate units proposed on sheet A03.

d. **Site Plan.**

- i. Show roof overhangs on the site plan.
- ii. *Advisory.* Removing floor plan details for individual units from the site plan and showing private patios and balconies in a different color would improve the legibility of the plan.
- iii. Identify the top of bank of Arroyo Burro Creek as delineated in the project biological resources assessment. Include measurements showing setbacks from the top of bank to the closest impermeable surface and the closest structure.
- iv. Indicate the location of pool equipment.
- v. Provide roadway dimensions and right-of-way limits for Calle Real and South La Cumbre Road and for access drives on the project site.
- vi. Dimension building setbacks to demonstrate compliance with zoning setback requirements. Setbacks along street frontages should be measured from the back of the existing or proposed street dedication, whichever is greater per SBMC §30.15.100. Setbacks from interior property lines should be measured to the property line. The plans include measurements from the building walls to various features along the property lines. Distinguish setback measurements based on the above-described standards so they are easily discernable from other measurements.

e. **Floor Plans and Elevations.**

- i. Indicate the height of all architectural features on building elevations and note exceptions to height limitations.
- ii. Include a dashed line for existing grade on all building elevations.
- iii. Show all doors and windows on floor plans.
- iv. If the trash room has an exterior door, update the north elevation on sheet A19 to show the door.
- v. Identify the locations of trash chutes on floor plans.
- vi. Include a legend or notes on sheets A17, A26, and A27 specifying the features and symbols shown on the roof plans. Depict the location of proposed tower elements on the roof plan.
- vii. Building elevations appear to include trellises on portions of the roof. Indicate whether roof decks for use by residents are proposed in these or other areas. If trellises or other structures are proposed on roofs, show the location(s), height, and materials of proposed structures on project plans.
- viii. Some building elevations appear inconsistent with the site and floor plans. For example, the gap between the parking structure and the building to the east on the site plan is not shown on the elevations on sheets A30 and A31. Please update as necessary for consistency between plans.
- ix. Please clarify the function of the "Move-In" room shown on sheet A22.
- x. Please confirm that all of the proposed uses in the amenities building, e.g., coffee shop, will only be available for use by project residents and not open to the general public.
- xi. Please confirm whether a second floor, loft, or mezzanine is proposed in the 42' high portion of the amenities building. If so, provide a floor plan for this level.
- f. **Building Sections.**
 - i. Depict existing grade on all building sections.
 - ii. Provide a north-south section of the North Building that includes the lobby.
 - iii. Provide an east-west site section of the South Building that includes the parking structure.
- g. **Lighting Plan.** Include the Outdoor Lighting Compliance statement on the Lighting Plan. See Appendix C of [Outdoor Lighting & Streetlighting Design Guidelines](#).
- h. **Fire Access Plan.** The location of existing and proposed fire hydrants on the Fire Access Plan (sheet A14) is inconsistent with those shown on the

Utility Plan (sheet C07). Correct the plans for consistency. Also see Fire Department comments regarding fire hydrant requirements.

- i. **Common Open Yard.**
 - i. Pursuant to SBMC §30.140.140.E.4, all required open yard areas shall be located outside the primary front setback and outside the first 10 feet of any secondary front setback as measured from the front lot line. The La Cumbre Road frontage is the primary frontage and the Calle Real frontage is the secondary frontage. Update the common open space exhibit on sheet L0.00 consistent with this requirement.
 - ii. Dimension at least one open yard area on the plans that meets the 20-feet long by 20-feet wide open space requirement per SBMC §30.150.090.G.2.b.iii.
- j. **Grading Cut-Fill Exhibit.** Provide a 3D simulation or map exhibit identifying areas of proposed cut and fill on the project site.
- k. **Landscape Plans.**
 - i. The measurements for walls on the wall and fence plan on sheet L4.01 appear to be incorrectly labeled as feet rather than inches (e.g., Painted Stucco Wall – 0-18’).
 - ii. Please indicate the proposed height and length of walls at the vehicular and pedestrian entrances in the site elevation on sheet L3.04. Portions of the walls appear significantly taller than the 18-36” height identified in the wall and fence plan on sheet L4.01.
 - iii. Update the irrigation plan to address irrigation plan requirements specified in the [Landscape Plan Submittal Guide](#).
 - iv. Provide a dimensioned plan of parking areas so staff can evaluate compliance with parking area landscape and fence standards in SBMC §30.175.080.

ADVISORY ITEMS:

1. **Preliminary Housing Application (SB 330).** A Preliminary Housing Application was submitted to the City on November 19, 2024, and was accepted on November 20, 2024. The Planning (PLN) Application was submitted within 180 days of the Preliminary Housing Application, on May 14, 2025. Be advised, you have 90 days, i.e., until September 17, 2025, to resubmit your Planning (PLN) Application materials, or the Preliminary Application will expire. The application will also expire if the number of residential units or the floor area of the project changes by 20% or more. If the application expires, a new Preliminary Housing Application and fee will be required, and the project will be subject to the rules and fees in effect at that time. Projects must commence construction within 2 ½ years of Final Approval.
2. **Outdoor Lighting.** Please clarify the purpose of the recessed wall lights on walls at the northern property line of the development site that face outward from the

proposed development. This lighting may not be consistent with the Outdoor Lighting & Streetlighting Design Guidelines, which state that light spill onto adjacent properties should be minimized.

3. **Solar Energy.** Per General Plan Policy ER6, installation of solar photo-voltaic arrays as part of new construction, redevelopment, and significant remodel projects should be provided. Multi-family residential projects of three or more units require provision of a minimum 2 kW system per unit if physically feasible.

Provide a preliminary photovoltaic roof plan showing the potential location(s) and size(s) of proposed solar photovoltaic arrays and an estimate of the amount of energy production so staff can evaluate the project's consistency with this policy. Layout and energy production may be estimated based on similar recent development projects and/or online estimators.

4. **Air Quality Highway 101.** A portion of the project is located within 250 feet of Highway 101 and is subject to the Air Quality Design Standards listed in SBMC Chapter 22.65. The following requirements apply to the project:
 - a. **Required Interior Air Filtration.** Show a central ventilation system with high efficiency air filtration and submit equipment specifications on plans for building permit submittal.
 - b. **Design Elements.** Show one or more of the required design elements identified in SBMC §22.65.040 on plans. The plans show the non-sensitive parking structure use located in the portion of the project within 250 feet of Highway 101, doors and outdoor living areas oriented away from the highway, and proposed landscaping to provide vegetative screening along the property frontage facing the highway. As currently proposed, the project appears consistent with this requirement.
5. **Off-Site Parking Recorded Agreement.** The project includes 11 parking spaces at the northern edge of APN 051-010-008 to meet parking needs for the remaining portions of La Cumbre Plaza. Since this parking will be located on a separate parcel from the uses it serves, pursuant to SBMC §30.175.060.A a recorded off-site parking agreement will be required as a condition of the Tentative Map.
6. **Tree Removal Review.** As indicated in prior email correspondence, after reviewing the proposed tree removals along the property frontages, staff determined review by the Street Tree Committee and Parks and Recreation Commission will not be required. Instead, review of all proposed tree removals will be by the ABR as part of their review of the project. This determination was made because the trees within the right-of-way along South La Cumbre Road and Calle Real have always been considered the adjacent property owner's responsibility per SBMC §15.20.090 (Maintenance Responsibility of Property Owner). Since the right of way has not been improved in this location, the trees have been considered private property. Further, the number of trees that would fall under Parks and Recreation Commission purview is so small, it does not make practical sense to fragment the review between the ABR and the Parks and Recreation Commission. Given this determination, sheets TR0.01 and TR0.02,

which separately identify trees along the property frontages can be removed from the project plan set.

7. **Average Unit Density Incentive Program Supplemental On-Site Notice.** For AUD projects with five or more units, in addition to the City's Notice of Development sign, you are responsible for designing, fabricating, and installing extra on-site notice signs. One sign should be located on each public street frontage. Instructions are found in the Planning (PLN) Application. Provide evidence (photos) that this additional sign is posted 10 days prior to each public hearing.
8. **Technical Reports.** This 30-day review focused on information needed for application completeness. Staff has not completed review of all submitted technical reports or the Draft EIR Addendum. However, we provide the following comments based on our preliminary review of these documents. Additional technical analyses or revisions to technical reports that have been submitted may be required during formal environmental review, which will begin after the application has been deemed complete.
 - a. For all technical reports, reconcile discrepancies in the project descriptions such that they are consistent with the project description provided with the Formal Planning Application and update the analyses as necessary.
 - b. **Phase 1 Archaeological Report.** The Phase 1 Archaeological Report was reviewed by the City's Archaeological Advisor who found that the report and its recommendations comply with the City's Master Environmental Assessment (MEA) Guidelines for Archaeological Resources that were in effect at the time of application submittal. The report will be scheduled for Historic Landmarks Commission (HLC) review and acceptance. We will contact you to coordinate the hearing date.
 - c. **Biological Resources Assessment (BRA).**
 - i. The methodology section of the BRA states that the top of bank of Arroyo Burro Creek is defined by the fence line. This is inconsistent with the top of bank depicted in Figure 4, which extends onto the project site to what appears to be the edge of the riparian canopy. Please update the report to include a consistent definition of the top of bank and describe the methodology used to determine top of bank for the project site.
 - ii. Figure 4 appears to show CDFW/RWQCB jurisdiction ending at the fence line/project site boundary. Is this accurate? If not, please provide an exhibit that clearly shows the jurisdictional area relative to the project site. If it is accurate, provide reasoning why CDFW jurisdiction would not extend to the edge of the riparian canopy. Also, ensure consistency with the CDFW/RWQCB jurisdiction depicted in the Arborist Report.

- iii. SBMC Ch. 22.10 applies to the Hillside Design District and is not applicable to the project site.
- iv. The BRA should evaluate the project's consistency with tree and vegetation preservation provisions in ABR General Design Guidelines and Meeting Procedures, Part II, Section 4, which are applicable to the project. The analysis should include a recommended minimum tree replacement ratio and size of replacement trees based on the type and size of trees proposed for removal and the expected survival rate of replacement trees. (See ABR General Design Guidelines Section 2.4.2.B for general tree replacement standards.)
- v. The project plans show proposed improvements extending into the tree protection zones of trees along Arroyo Burro Creek, as identified in the arborist report. The BRA should include an analysis of potential impacts associated with this encroachment.
- vi. The BRA should include an analysis of the impact of proposed project lighting on Arroyo Burro Creek habitat.
- d. **Arborist Report.**
 - i. The arborist report should be updated to include a detailed impact analysis based on the current detailed site plan, which it states was not available at the time the report was prepared.
 - ii. As recommended in the BRA, a site-specific tree protection plan should be prepared to replace the generic plan included in the Arborist Report. It should address all trees potentially impacted by the project, including those adjacent to the project site.
- e. **Parking Analyses.** Thank you for the two Fehr & Peers memos regarding parking for the project development site and the remainder of La Cumbre Plaza. We are reviewing these memos relative to information provided by the 3805 State Street redevelopment project applicant and City records. We will follow up with additional direction regarding La Cumbre Plaza parking once we complete our review.
- f. **Fault Rupture Hazard Investigation Report.** Per the enclosed memo from ENGEO, the City's third-party geotechnical reviewer, dated May 20, 2025, the Fault Rupture Hazard Investigation Report, dated March 18, 2025 was completed in general conformance with City and State guidelines and ENGEO opines the recommended fault zone setbacks are reasonable to mitigate the potential for surface rupture of the Mission Ridge Fault.
- g. **Traffic Impact and VMT Reports.** Please see comments regarding these reports in the Transportation Division comments below.
- h. **Preliminary Sewer Study.** See comments regarding the sewer study in Wastewater comments below.

- i. **Preliminary Water Demand Study.** See comments regarding the water demand study in Water Connection & Distribution comments below.
 - j. The following technical reports are currently being reviewed and staff will provide comments at a future date:
 - i. Air Quality and Greenhouse Gas Emissions Study prepared by Rincon Consultants, dated April 2025;
 - ii. Freeway and Gas Station Health Risk Assessment prepared by Rincon Consultants, dated April 2025;
 - iii. Geotechnical Investigation: Proposed Residential Development, 3845 State Street prepared by GeoCon West, dated March 18, 2025;
 - iv. Noise and Vibration Study, prepared by Rincon Consultants, dated April 2025; and
 - v. Preliminary Hydrology & Stormwater Quality Report prepared by Stantec, dated May 2025.
9. **County Environmental Health Services (EHS).** The following comments were provided by staff at the Site Mitigation Unit of the Santa Barbara County Public Health Department EHS Division:
- a. Based upon data on GeoTracker there are LUFT or SMU sites nearby that would be expected to impact the subject site. The site is a former LUFT Site (Sears Service Center 3845 State Street, GeoTracker Global ID T0608300740). This case involved the removal of a 550-gallon waste oil tank at the site's auto service center. According to the case closure summary, petroleum impacted soil was left in place at a depth of 10 feet below ground service. EHS recommends contacting the Central Coast Regional Water Quality Control Board regarding this site as they are now the Lead agency for LUFT sites in the County. Joey Sisk with the Regional Water Quality Control Board was copied EHS's comments. Additionally, auto service centers may have had underground hoists and used chlorinated solvents to clean parts. Underground hoists that operated prior to 1978 may have used PCBs in their hydraulic oil. A review of the City's street file indicates:
 - i. A 550-gallon above ground waste oil tank was installed in 1990 and replaced in 2002; and
 - ii. A transformer was installed in the 1960s. If the cooling oil was used in the transformer, it may have contained PCBs.
 - b. Based upon this former use, a Phase I Environmental Site Assessment was performed on the site, which EHS reviewed and commented on in our March 6, 2025 letter which is enclosed with this letter. Conditions of approval will be required to ensure compliance with EHS recommendations.

- c. Based upon data on the Cal-GEM website, there aren't historic oil drilling wells in proximity to the site. The nearest well to the property appears to be more than 6,000 feet away.
- 10. **Moderate-Income Housing Plan.** Please note that a Moderate-Income Housing Plan will be required prior to issuance of a building permit. Refer to SBMC §30.150.140 for requirements. Be aware that the inclusionary units must conform to the standards in SBMC §30.150.130. We recommend submitting a draft version of the Moderate-Income Housing Plan now to avoid delays later in the process.
- 11. The following comment from the pre-application review letter dated December 20, 2024 continues to apply and is included here for continuity:
 - a. **Inclusionary Requirements for AUD Rental Housing.** The project is subject to the City's rental housing inclusionary requirements (SBMC §30.150.110), which implements policies of the Housing Element. For projects with 10 or more rental housing residential units developed in accordance with the AUD Program, at least 10% of the total residential units on site shall be constructed and offered at a Moderate-Income affordable level. In determining the number of Moderate-Income units, any decimal fraction of 0.5 or more shall be rounded up to the nearest whole number, and any decimal fraction less than 0.5 shall require payment of an in-lieu fee. The project, which proposes 44 units at the Moderate-Income level, is consistent with the inclusionary requirement. In addition, an in-lieu fee is required based on the following formula: Fractional Unit/Total Moderate-Income Unit Requirements x Per Square Foot Fee x Net Floor Area in the project. See §30.15.070 for the definition of Net Floor Area.

B. Access, Parking & Traffic – Transportation Planning Division

Staff Contact: Jessica Grant, JGrant@SantaBarbaraCA.gov; (805) 564-5385

REQUIRED ITEMS:

- 1. **Pedestrian/Bike Access.**
 - a. **Right of Way Improvements on South La Cumbre Road (SBMC §22.44).** The 80-foot right-of-way on South La Cumbre Road requires a 6" curb, 4' parkway or tree well area, 8' sidewalk and 2'-6" of "frontage zone", which is usually a buffer on the private property between the back of sidewalk and the closest vertical obstruction. Low walls of 3'- 6" or less may be within the frontage zone. The driveways on La Cumbre Road are required to be commercial style driveways per City Standard Detail H-03.1. Required sight lines include a 10' x 10' triangle (behind property line), and 250' looking both north and south on La Cumbre Road from 15' back of the La Cumbre Road curbline.

On sheet C04 of the plan set, the parkway and sidewalk width are correctly shown. The frontage zone is also required to be shown and can be on private property. Add a note that low walls of 3'- 6" or less may be

within the frontage zone. Show compliance with required sight lines (see paragraph above). Add a detail that the commercial style driveway per City Standard Detail H-03.1 will be provided.

- b. **Right of Way Improvements on Calle Real.** There is no existing pedestrian path of travel on Calle Real as shown in the plans. There is a partially funded City Capital Project identified in the City's Capital Improvement Plan to construct a separated multiuse path along Calle Real from Oak Park to La Cumbre Road. The portion that is funded and in design is from Oak Park to Las Positas Road. Please show the multiuse path along the entire Calle Real Property frontage. The applicant will be required to install these path improvements in accordance with SBMC 22.44 and General Plan consistency findings required for approval of the Tentative Map. The path corridor shall be 17 feet wide, comprised of a five-foot buffer from the road and path that is landscaped with trees, a 10-foot wide path, and a two-foot buffer between the path and the new property line. Required sight lines include a 10' x 10' triangle (behind property line), and 305' looking both directions on Calle Real from 15' back of the Calle Real curbline. The driveways on Calle Real are required to be commercial style driveways per City Standard Detail H-03.1.

On sheet C04 of the plan set, the parkway and sidewalk width are correctly shown. That said, we believe there is an opportunity to provide increased sidewalk and parkway width on the Calle Real frontage due to very wide existing traffic lanes. The curb can be moved out 5' into Calle Real, possibly up to 8' at the southern end of the site, which would provide a minimum 8' parkway and 12' sidewalk. This may also help with avoiding an underground storm water chamber if the parkway has enough area. The sidewalk alignment between the bus pocket and driveway looks quite sharp. An 80'R centerline reverse curve is preferred. It will probably look better once the bus pocket approach taper is corrected. The sidewalk alignment just north of the bus shelter looks a little sharp too. Use an 80'R centerline reverse curve.

The frontage zone is also required to be shown and can be on private property. Add a note that low walls of 3'- 6" or less may be within the frontage zone. Show compliance with required sight lines (see paragraph above). Add a detail that the commercial style driveway per City Standard Detail H-03.1 will be provided.

- c. **Walkway Connections to City Right of Way.** Call out widths of pedestrian walkways within the project that connect to the right of way. Please provide a pedestrian access connection/direct route from the development to the transit stop on Calle Real. Currently the connection is much longer than it needs to be.
- d. **Access Adjacent to Arroyo Burro Creek and Timing of Access.** Access along Arroyo Burro Creek shall extend on both parcels on the Tentative Map and project plans (APNs 051-010-007 and -008). The project at 3805 State (Case No. PLN2024-0227) that also includes a

subdivision between parcels (APNs 051-010-012, -013, and -014) shall provide the remaining 165 feet of connection along Arroyo Burro Creek to Hope Avenue. It is critical for ped/bike circulation around and within the La Cumbre Plaza campus (including all five parcels) so residents and community members/customers have the option to walk and bike and not rely solely on vehicle trips. Public access easements are required.

Include the multiuse path adjacent to Arroyo Burro Creek with Phase 1 if construction is phased so Phase 1 residents have access and do not have to go through the La Cumbre Plaza to get to Hope Avenue.

- e. **Driveway Access onto La Cumbre Road.** Driveway onto La Cumbre Road should be designed with a porkchop to limit egress movements to right turn only.
- 2. **Transit Stop on Calle Real.** The approach and departure tapers for the bus pocket do not appear to be long enough. Please provide a detail demonstrating compliance with [MTD standards](#).
- 3. **Lighting.** See Engineering comments for Type A-16 Street Lights.
- 4. **Demonstrate Compliance with the City's Access and Parking Standards.**
The following is a list of access and parking standards and the status of compliance. Please address items as noted:
 - a. Minimum Stall Dimensions. Detail is shown.
 - b. Minimum Bay Dimensions. Detail is shown.
 - c. Clearance from Vertical Elements. Detail shown in plan and note view.
 - d. On Site Loading. Please demonstrate on plans where the following vehicles are accommodated on site by location and with vehicle turning templates: Marborg Trucks, Moving Trucks, Delivery Trucks, Service Vehicles, Emergency Vehicles, Rideshare Vehicles.
 - e. Maneuvering. Please provide a hard copy plan so staff can determine compliance with the City's standard design vehicle.
 - f. Driveway Widths. Shown but need to reference City Standard Detail H.03.
 - g. Driveway Aprons. Shown but need to reference City Standard Detail H.03.
 - h. Driveway Lengths. Provide dimensions on plans.
 - i. Driveway Throats. Provide dimensions on plans.
 - j. Vehicle Ramps. Please demonstrate compliance in plan and section view. Vertical Curves. Please demonstrate compliance in plan and section view.
 - k. Sight Visibility at Driveways. Please demonstrate compliance at all proposed/existing driveways.
- 5. **Bicycle Parking.** Thank you for showing the locations of the short-term and long-term bicycle parking. Please provide additional details demonstrating proposed parking meets the City Access and Parking Design Standards and provide

manufacturer's specification sheet. It is also highly recommended that the bike racks meet a wide variety of bike types (youth bikes, cargo bikes, e-bikes) for both short- and long-term parking.

6. Fehr and Peers Technical Memo for VMT Screening.

- a. Update project description to include all discretionary approvals and indicate that the project involves a subdivision of APNs 051-010-007 and -008. Include proposed public improvements/access easements in the description.
- b. Update maps to include all areas applicable to the subdivision. Please confirm if the analysis changes.
- c. As noted in the memo, per CEQA Guidelines, residential land development projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. The project meets this requirement.

7. Fehr and Peers Technical Memo for Traffic Impact Study.

- a. Update project description to include all discretionary approvals and indicate that the project involves a subdivision. Include proposed public improvements/access easements in description and ensure the proposed number of parking spaces is consistent with the project plans.
- b. Update maps to include all areas applicable to the subdivision.
- c. In general, staff agrees that the project would not result in a project-specific traffic effect for the net new trip generation. That said, please provide a detailed list of what is making up the retail, indoor warehousing and storage uses to confirm the correct land use and trip generation rate per ITE Traffic Generation Manual and City traffic model rates were applied.
- d. Site Access.
 - i. There is a driveway proposed between Driveway 1 and the intersection of South La Cumbre Road and Calle Real. Please provide analysis and queuing for that driveway.
 - ii. The project involves a subdivision. Please confirm site access for the entire development.

ADVISORY ITEMS:

- 1. 30-Foot Road Easement between Habit/Bristol Farms and Subject Property.** Consider moving a portion of the landscape area between the sidewalk and building to a parkway to provide a buffer between pedestrians and vehicles.

C. Building Code – Building & Safety Division

Staff Contact: James W. Martinez, JWMartinez@SantaBarbaraCA.gov; (805) 564-5485

REQUIRED ITEMS:

1. **No Required Items.** No additional information is required at this time.

ADVISORY ITEMS:

The following comments are intended to assist in identifying potentially significant issues that may affect your project. The plans lack sufficient information to perform a review of major potential code issues. The comments below must be addressed at building permit submittal. However, staff recommends you consider them now to avoid late hits/need for redesign. A comprehensive plan review will be performed when the project is submitted for a building permit.

1. **Building Codes.** Applicable building codes will be based on the date the project is submitted to Building & Safety for a building permit. Currently, the 2022 California Codes are in effect.
2. **Energy and Green Building Requirements.**
 - a. Project to comply with the Mandatory PV & Battery Requirements for New Construction per 170.2 (2022 CEnC).
 - b. New construction to provide electric vehicle infrastructure and facilitate electric vehicle charging shall comply with Section 4.106.4.2 and shall be provided in accordance with regulations in the California Building Code and the California Electrical Code. It is highly recommended that the design team review applicable code sections prior to submitting construction documents.
 - c. Please provide a commissioning plan per Section 120.8 (2022 CEnC) & Section 5.410.2 (2022 CGBSC).
3. **Parking Requirements.** In addition to the electric vehicle requirements noted above, parking tabulations on sheets A03, A16 and A21 have discrepancies within them. The types and amounts (van vs. standard) of accessible parking stalls provided do not comply with the applicable portions of 11B-208. Compliance with accessible and electric vehicle parking requirements will be reevaluated once parking discrepancies are addressed.
4. **Undergrounding of Utilities.** All utility conductors including electrical service, telephone service and cable television must be placed underground from their point of origin at the utility pole to the service meter or termination point at the structure per the City of Santa Barbara's Municipal Code Chapter 22.38.
5. **Building Permit Application Advisories.** At minimum, provide the following when submitting for a building permit:
 - a. Indicate on plan how pedestrians will be protected (walkways, barricades, signage, etc.) during demolition, and construction as required by the applicable Sections of 3306 (2022 CBC) including Table 3306.1.

- b. Provide a construction waste management plan to show compliance with Section 5.408 (2022 CGBSC) and all applicable subsections. Public works to address weight limitations, routing, and traffic controls for the removal of material from the site.
- c. Provide approval of State Storm Water Permit prior to commencement of project. Plans to show compliance with Section 5.106.2 (2022 CGBSC).
- d. Please include a grading plan including sectional views showing fill and removal of soil for each building. Indicate staging areas for soil components: rock, sand, B-base, etc. Indicate staging areas for spoils to be removed per Section 5.408.3 (2022 CGBSC). Indicate erosion control measures per Section 5.106.1.2 (2022 CGBSC) to be utilized for onsite storage of spoils and soils (straw waddles, silt fencing, chevrons, covering(s), etc.).
- e. Indicate on plan the process for the handling of any contaminated liquids (water / sand / dirt) extracted from the site. Indicate the organization / facility engaged for the transportation of contaminated liquids. Public works to address routing and traffic controls for the removal of spoils from the site.
- f. Soils report to be included in plan.
- g. A shoring plan to be submitted concurrently with grading plan. Shoring plan to indicate how project will adhere to Section 3307 (2022 CBC) - Protection of Adjoining Property and all subsections. Written notice shall be provided to the owners of the adjoining buildings advising them that the excavation is to be made and that the adjoining building should be protected. Said notification shall be delivered not less than 10 days prior to the scheduled starting date of the excavation. Provide letter from soils engineer for substantial conformity for shoring plan.
- h. Provide in plan a schedule of all required soils inspections or requirements per any geological studies/soils reports to be conducted by soils technician(s), Geologist(s), or Engineer(s).
- i. Grading survey and report will be required before foundations are poured or inspections are requested.
- j. Temporary Power plan to be contained within electrical sheets. Utility clearance and locations of temporary poles, transformers, equipment (job trailers) to be provided.
- k. Job trailers require a separate permit. Provide mounting, and seismic restraint details. Trailers utilized for sales / advertising are required to comply with the applicable sections of Chapter 11B (2022 CBC).
- l. Provide type of construction.
- m. Provide actual vs allowable square footage per CBC Chapter 5.
- n. Please provide a reference to the grade plane utilized to obtain the allowable height and stories above grade. Civil sheets to correspond.

- o. Please clarify the height of the building(s) above the grade plan to allow verification of compliance with Table 504.3.
 - p. Please clarify the number of stories above grade plane to allow verification of compliance with Table 504.4.
 - q. Ensure maximum travel distance. Delineate and annotate any rated corridors, interior egress stairs and/or, exterior egress stairs.
 - r. It is not clear from the current plans whether Level 0 of the parking structure would be considered underground parking pursuant to CBC. Underground parking structures must comply with applicable Sections of Chapters 4 & 5 (2022 CBC) as well as Section 120.6(c) (2022 CEnC).
 - s. Project to provide full compliance with Chapter 11B (2022 CBC).
 - t. Clearly note if the project will be part of the California Tax Credit Allocation Committee ("Committee" or "CTCAC") which administers low-income housing tax credit programs in affordable rental housing.
 - u. Provide total accessible vs adaptable dwellings units per CBC 11A or 11B as applicable depending on funding.
 - v. If privately funded; all adaptable units must comply with CBC 1128A which includes requirements for door widths, accessible routes, bathroom and kitchen designs.
6. **Pre-Construction Requirements.**
- a. Either before or after permit issuance a required onsite pre-construction meeting shall be scheduled. Representatives from the following City Departments shall be present: Building & Safety, Public Works, Planning, Creeks, Transportation.
 - b. Prior to the start of the project an address must be visible from South La Cumbre Road and Calle Real for emergency vehicles as well as City staff.
 - c. Provide a prominent note on cover sheet containing work hours for project.

D. Wastewater – Water Resources Division

Staff Contact: Mariana Cruz, MCruz@SantaBarbaraCA.gov; (805) 564-5363

REQUIRED ITEMS:

- 1. **Utility Plan.** Identify all existing and new sewer service laterals along with identification of service lateral size, abandon or protect in place, and connection to the City's sewer main on the utility plan.
 - a. City staff is available to coordinate a meeting with the applicant to review and discuss the proposed utility plan in more detail.
 - b. The utility plan indicates a connection to a private sewer main. Please clarify the proposed connection point to the City's public sewer system.

- c. All existing and proposed sewer easements must be accurately identified and labeled on the utility plan.
 - d. Any relocation of City-owned infrastructure must be performed by the City's contractor and constructed in accordance with City Standard Details and SBMC requirements.
 - e. Clearly differentiate between publicly and privately owned portions of the sewer system.
 - f. Confirm that there are no cross-connections between potable water, stormwater, and sanitary sewer systems.
 - g. Any proposed abandonment of City-owned sewer infrastructure, including sewer mains and manholes, must follow City Standard Details.
 - h. The grease interceptor must be clearly labeled on the utility plan. If abandonment is proposed, it must be completed in accordance with City Standard Details.
 - i. The utility plan legend should be updated to clearly distinguish between different utility types.
 - j. Item labeled "construct public 8-inch sewer main," must be a private main or sewer lateral.
2. **Existing Sewer System.** The Preliminary Sewer Demand Study provides summary information regarding sewer demand but appears to be based on Camarillo Sanitary District rather than City of Santa Barbara standards. In order for the City to evaluate potential downstream impacts on the collection system, please provide the estimated wastewater flow (in gallons per minute) that will be discharged from the proposed project to the sewer main.
- a. Applicant must provide fixture calculations.
 - b. Please contact staff if you need further clarification.
 - c. City staff will utilize information provided by the applicant to run a model specific to the City of Santa Barbara's wastewater collection system.

ADVISORY ITEMS:

The applicant has acknowledged the following comments provided for in the pre-application review letter for the project dated December 20, 2024.

- 1. **Sewer Lateral Inspection Program (SLIP).** Please note the City's SLIP Program for Commercial Properties applies to this property. A SLIP inspection through the commercial program is required on a 15-year cycle. The inspection must be completed by a City Certified CCTV inspector; details will be provided in the notice mailed to the address on file.
- 2. **Grease Control Device.** Grease Control Device must be installed per City of Santa Barbara standard details. For more information, contact the City's Wastewater Resources Compliance Specialist at (805) 568-1005.

E. Water Connection & Distribution – Water Resources Division

Staff Contact: Jeffrey Becker, JBecker@SantaBarbaraCA.gov; (805) 564-5406

REQUIRED ITEMS:

1. **Utility Plan:** To ensure resiliency and the ability to receive water to your project please extend your proposed water main on South La Cumbre Road from your point of entry to La Cumbre Plaza Lane and show this on your Utility Plans and Civil Sheets. This change will ensure water service in the event of an emergency such as a water main break.
2. **Water Model:** Water Distribution requires the project to run a hydraulic model to determine the impact to our infrastructure and surrounding area. The applicant is to work with the City to run the model at the project's expense. The results of the water model could impact not just the project, but the infrastructure serving the project. The study results will include water supply, flow, pressure for the project, and other customers affected in that zone and by our system.
 - o Please provide the following information to the best of your abilities for use in the water model:

FIRE FLOW DATA

TOTAL FIRE FLOW REQUIREMENTS: _____ GPM

Total fire flow requirements are based on the building size or largest area between 4-hour fire walls and the type of construction in accordance with the UBC Table 6A & UFC Table III-A-A. (Consult the Fire Department having jurisdiction.)

ON-SITE FIRE FLOW REQUIREMENTS (to be provided by the DCDA's or FIRE SERVICE

METERS):

- A. On-site fire hydrant requirements= _____ GPM
- B. Building fire sprinkler requirements= _____ GPM
- C. On-site fire pump for sprinklers required: Yes ☐ No ☐
- If Yes: Rated capacity of the fire pump= _____ GPM X 150%=
_____ GPM

NOTE: If on-site fire pumps are required, test flow requirements are normally 150% of pump rated capacity.00.0

(Consult with Agency having jurisdiction)

- D. On-site fire flow= GPM (The higher of the values show in A, B, or C.)

ADVISORY ITEMS:

1. Be advised, all water infrastructure located within the mall property may be turned over to the owners as a private water system in the near future.
2. Water Distribution reserves the right to determine the need for system improvements, at the project's expense, to ensure the water system's reliability and will determine all points of connection (POC) for water services to the project. This may include establishing multiple POCs to the City's water distribution system.

- a. The proposed diameter and material for the new main on Calle Real and South La Cumbre Road are subject to change based on City standards and results of the water model.
3. Be advised that a hazard assessment or cross-connection survey shall be required to comply with new State regulations. The inspection type shall depend upon your project's complexity and shall determine the need for backflow protection. The timing for these inspections shall be left up to the applicant but must be done prior to closing in the walls and after the rough plumbing inspection. The ideal time would be after all plumbing and fixtures have been installed.
4. Backflow assemblies are required at: private main POC, residential master meter, irrigation meter and fire line. Additional backflow protection may be required based on findings from inspections, assessments, surveys and plan review.

F. Water Conservation – Water Resources Division

Staff Contact: Sara Brittain SBrittain@SantaBarbaraCA.gov; (805) 897-2540

REQUIRED ITEMS:

1. **Dedicated Private Submeters.** Each residential unit must be served by a dedicated private water submeter. The submeters must be located on private property. All water to each unit must be metered (not just hot or cold). Property owner must read and bill tenants for water service based on actual water usage. Refer to State law for regulations including but not limited to submeter installation requirements, billing requirements, submeter location requirements, and tenant access requirements. Please show the location of all submeters on the plans.
2. **Utility Easements.** When a City meter is located outside of an existing City right-of-way, the property owner must dedicate to the City an easement or agree to provide the City the irrevocable right of access to locate, operate, replace, maintain, and read the meter by a deed or agreement approved by the City Attorney (SBMC §14.08.140). Please clarify utility easements on the project plans and tentative parcel map.

ADVISORY ITEMS:

1. **Landscape Compliance Checklist (LCC).** Thank you for providing the signed LCC on sheet L5.02, please indicate the sheet numbers to verify compliance for each line item or indicate N/A if not applicable. This is required at building permit submittal.
2. **Irrigation Efficiency.** The irrigation equipment list on sheet L5.02 does not include the rain sensor(s). Please include the rain sensor(s) in the equipment list and show the location(s) on the plans submitted for building permit.
3. **Mulch Requirement.** All appropriate landscaped areas will be covered with at least 3" mulch, organic is preferred. Please include this in the planting notes when submitting for a building permit.

G. Right-of-Way & Subdivision Development – Engineering Division

Staff Contact: Raina French, RFrench@SantaBarbaraCA.gov; (805) 564-5383

REQUIRED ITEMS:

1. **Tentative Subdivision Map.** The submitted Tentative Map is incomplete and does not contain all items required by SBMC §27.07.030. The following items are missing or incomplete:
 - a. Please provide a current preliminary title report (90 days or less) for all parcels that will be affected by the subdivision. Staff is unable to determine the consistency with Subdivision Map Act without this information.
 - b. The map does not clearly show existing vs. proposed lot lines. Staff highly recommends splitting the map into separate pages with existing and proposed conditions shown separately for clarity.
 - c. The measured vs. recorded boundaries appear to differ from each other in some locations on map, in both distance and bearing, but are noted on map as identical. Please clarify.
 - d. Indicate the width and approximate radii of curves of existing streets, including adjacent streets. Clearly note public roadways as such. Please show the portion of South Hope Avenue adjacent to parcels in Detail A; many details are lacking on Detail A.
 - e. Show locations of all existing and proposed rights-of-way, easements, and other public uses to be dedicated or reserved for public use. Proposed elements must be shown on the Tentative Map as well as civil plans.
 - f. Provide the width, approximate grades, and cross sections of all proposed public improvements. These must be shown on the Tentative Map as well as civil plans. This also includes proposed street lighting.
 - g. Show existing culverts and drainpipes within the subdivision and contiguous areas as well as proposed drainage facilities.
 - h. Depict proposed water system and source of water supply.
 - i. Depict proposed sewer system including elevations at proposed connections.
 - j. Depict any setback lines that are different from or in addition to those required by Zoning Ordinance.
 - k. Depict the proposed fire protection system.
 - l. Show the location of proposed above ground collective public facilities. This includes transformers located within public right-of-way, if required by Southern California Edison (SCE).
 - m. Provide basis of elevation and basis of bearing.

- n. Provide phone number of owner and subdivider.
 - o. Provide address and phone number of map preparer.
 - p. The following items should be removed from the map to improve legibility: parking spaces and concrete barriers within the lots, trees and lighting internal to the lot, and fencing internal to the lot.
2. **Public Improvements.** The following items are incomplete or missing from public improvement plans:
- a. Public Works Traffic Engineering is supportive of widening the sidewalk and parkway width on Calle Real frontage by moving the curb line towards centerline of Calle Real by approximately 5 feet, thereby providing a minimum 8-foot parkway and 12-foot sidewalk. Please depict this on plans.
 - b. It appears from the Grading and Drainage civil plans (sheets C04-C06) that a dedication of easement is required on both South La Cumbre Road and Calle Real to provide the required sidewalk width set out in the Pedestrian Master Plan (see Transportation comments in section B of this letter). Please identify the area to be dedicated, including width, on both the civil plans and Tentative Parcel Map.
 - c. Please provide more detail on the proposed 36' public access easement shown on sheets C05 and C06. This proposed easement is also missing from the Tentative Parcel Map.
 - d. The proposed bus pocket does not appear to adhere to Standard Construction Detail H-08.0 – the pocket does not meet the standard 140' width and does not provide long enough tapers. Please see detail H-08.1 for taper lengths.
 - e. The sidewalk alignments between the bus pocket and driveway on Calle Real and alignment just north of the bus shelter are too sharp. Please use an 80' radius centerline reverse curve to taper sidewalk transitions.
 - f. New street lighting must be constructed per City Standard Detail L-03.0 for Type A-16 pole and L-03.3 for Type A-16 compatible luminaire. Update plans to show this fixture and pole.
 - g. Provide the amount of export in the estimated earthwork quantities on sheet C01.
3. **Grading and Drainage.**
- a. As a general rule, Public Works does not support the construction of underground stormwater retention chambers within the public right-of-way. Please revise the plans to move these onto private property or employ a different strategy for right-of-way stormwater management. See above comment 2a regarding the widened parkway on Calle Real – this may provide enough bioretention area to avoid chambers within the right-of-way.

- b. Please clarify on the Grading and Drainage plans that all onsite storm infrastructure will be private. There is a large network of City and County storm infrastructure in the area so it is critical to distinguish between them.

4. Utility Plan.

- a. Any relocation of City-owned infrastructure must be performed by the City's contractor and constructed in accordance with City Standard Details and SBMC requirements. Easements associated with this existing infrastructure shall be noted on the Tentative Parcel Map as existing conditions. Proposed easements associated with the relocation of City infrastructure shall also be noted on the Tentative Parcel map as proposed conditions.
- b. Clearly differentiate between publicly and privately owned portions of the proposed utility systems.
- c. The civil utility plan (sheet C07) does not provide enough detail on different types of vaults and manholes. Please differentiate between water, sewer, electrical, and telecoms infrastructure.
- d. City records indicate there is an existing grease control device (GCD) onsite. Please note this on civil utility plans. In the demolition phase of construction, it is critical to properly decommission the GCD.
- e. Please note if the project has had any preliminary conversations with SCE regarding the electrical service to this development and the proposed power pole relocations noted on sheet C07. If public transformers (not located on private property) are proposed as part of SCE plans, these will need to be shown on the Tentative Parcel Map as well.

ADVISORY ITEMS:

- 1. Please be aware that preliminary SCE plans are required at building permit submittal and final 'for construction' plans are required prior to approval of Public Works C-1 plan.
- 2. The dual directional access ramps at the Calle Real/S La Cumbre Road intersection may be in conflict with the traffic light here. Public Works Engineering will work with the applicant to avoid relocating the pole. Additionally, the pedestrian push button will need to be relocated. These items can be addressed at C-1 plan review and approval.
- 3. **Public Works Permit Submittals.**
 - a. After approval of the Tentative Parcel Map, the project will need to submit a Parcel Map to Public Works for approval and recordation. This map shall be recorded with the County of Santa Barbara prior to issuance of any building permits.
 - b. A Public Works C-1 plan is needed for the extent of public improvements required for this project. This C-1 plan will be reviewed and issued concurrently with the first building permit for the project. This plan should include all work in the right-of-way proposed under this project (hardscape

improvements, grading and drainage, utilities, lighting, easements, road striping and/or curb painting plan, etc.).

- c. Separate Public Works water and sewer work orders will be required for new service installations. Apply for these permits after approval of C-1 plan. More information on these applications will be provided during C-1 plan review and approval.

H. Fire Code – Fire Department

Staff Contact: Aaron Lynn, ALynn@SantaBarbaraCA.gov; (805) 564-5702

REQUIRED ITEMS:

1. **Fire Sprinklers.** Each of the buildings requires an automatic fire sprinkler system and a backflow prevention device that is appropriately screened. See SBMC Chapter 8.04 and SBMC §22.04.025. Please note on the project plans that a “fire sprinkler system will be provided under separate permit” and locate where the backflow prevention device will be located. Fire sprinkler systems require a separate “FIR” permit through the Fire Department in the City’s Permit Portal prior to building permit issuance.
2. **Fire Hydrants.** A new fire hydrant will need to be installed as part of your project to meet the requirement for a fire hydrant within 300 feet (commercial) or within 500 feet (residential) of all portions of buildings. See SBMC §8.04.020, Sections 507.5.1 & 507.5.1.1. Based on review of the fire access plan (sheet A14), there are no fire hydrants. Civil utility plan sheet C07 shows three proposed public fire hydrants on the project site in parking areas. The proposed locations in parking lots, between parking stalls, will potentially limit access and is not supported. The preferred location for hydrants is in the public right-of-way. Identify the proposed location of the fire hydrant and associated water lines on project plans and ensure consistency between plan sheets.

I. Waste & Recycling – Environmental Services Division

Staff Contact: Daniela Rosales, DRosales@SantaBarbaraCA.gov; (805) 991-7741

REQUIRED ITEMS:

1. **Capacity.** Show all containers to scale in each enclosure and indicate the size and waste stream of each container.

ADVISORY ITEMS:

1. **Access.** Please clarify who will transport the trash from the trash terminus rooms to the trash staging area and who would operate the stinger truck on the Waste Management Plan.
2. **Access.** If the hauler will be responsible for pushing dumpsters to the staging area, the enclosure should be located no more than 50’ from the staging area. Path of travel cannot exceed 2% grade for dumpsters and must be smooth pavers, i.e. concrete. Path of travel cannot include stairs of any kind.

3. **Enclosure Guide.** Our [Enclosure Guide](#) includes helpful resources to assist you in designing your project, such as container dimensions on page 18, dumpster diagrams on pages 11 and 15, and cart diagrams on page 16.

J. Storm Water Management – Creeks Division

Staff Contact: James Rumbley@SantaBarbaraCA.gov; (805) 897-1910

REQUIRED ITEMS:

1. **No Required Items.** No additional information is required before application is considered complete.

ADVISORY ITEMS:

1. **Tier 3 SWMP compliance in ROW.** Before Design Review Final Approval, update the storm water report and grading and drainage plan to clearly indicate how Tier 3 compliance will be achieved for the project site in the public right-of-way (ROW). Since between 2,000-15,000 sf of new and redeveloped impervious area is proposed in the ROW, Tier 3 SWMP compliance must be demonstrated for the entire project site, which for this project is set to include all impervious area (sidewalk and half of Calle Real and La Cumbre Road) from the property line to the center line of the road for the entire ROW frontage of the property (i.e., both Calle Real and La Cumbre Road frontages). Currently, the storm water report identifies the incorrect tier for the ROW work and specifies an incorrect project site.
2. **Treatment of all impervious surfaces.** Before Design Review Final Approval, update the storm water report and grading and drainage plan to clearly indicate how storm water from all impervious area on the entire parcel will be treated. Currently, storm water from the new and replaced impervious area onsite identified on exhibit SW02 in the storm water report with pink and brown parallel lines (all in DMA 4) is proposed to bypass treatment. Tier 4 projects must capture and treat storm water from 100% of onsite impervious surfaces. It is not acceptable to substitute treatment for this impervious surface with offsite impervious surface as proposed. Also, treatment of on-site impervious surface must be proposed on-site – not in the ROW. In addition, on the grading and drainage plan, for all pathways and driveways at the property line, demonstrate that storm water will not flow off the property untreated. Currently, the grades and finished elevations indicate that storm water will flow off the property without treatment.
3. **Peak runoff discharge rate.** Before Design Review Final Approval, modify Tables 3 and 4 in the storm water report to include an additional column for proposed peak flows with BMPs. See the storm water report template in Appendix B of the City's Storm Water BMP Guidance Manual.
4. **Cross-section details.** Before Design Review Final Approval, include cross-section details of all proposed storm water improvements (BMPs) that demonstrate compliance with requirements detailed in the City's Storm Water BMP Guidance Manual.

5. **BMP worksheets.** Before Design Review Final Approval, in the worksheets in the storm water report, demonstrate that the BMP drawdown time will be less than 72 hours. If necessary, propose alternative BMP locations with higher infiltration rates.
6. **Impervious creek channel.** Since it is infeasible to provide treatment for the impervious portion of the Arroyo Burro channel, instead, calculate the required volume associated with the impervious surface and increase the size of the proposed BMP in a different DMA accordingly (i.e., overtreat impervious area in a different DMA instead of treating storm water in the creek channel).
7. **Roof downspout locations.** Before Design Review Final Approval, identify all roof downspout locations on the grading and drainage plan sheets. In addition, it must be demonstrated that all roof downspouts flow to proposed BMPs.
8. **Gravel void space assumption.** Before Design Review Final Approval, in the chamber wizard output in the storm water report, revise the 40% void space assumption to 32% maximum.
9. **Infiltration testing.** Before Design Review Final Approval, additional infiltration testing is required. The testing performed is insufficient. Infiltration rates are required – percolation rates are not acceptable. Ensure that testing is performed in accordance with the testing requirements in Chapter 4 of the City's 2020 Storm Water BMP Guidance Manual. Testing should be performed within the footprint of the proposed BMPs at the depth where stormwater is proposed to infiltrate.
10. **Pre-treatment.** Before Design Review Final Approval, on the grading and drainage plan sheets, demonstrate how pre-treatment for sediment and debris will be achieved for all tributary flatwork before storm water enters the proposed infiltration BMPs.
11. **Drainage system.** Before Design Review Final Approval, on the grading and drainage plan, add invert elevations and slopes of each pipe for the complete drainage system. Add top of grate elevations to each catch basin.
12. **Scope of work.** For the building permit submittal, include a description of proposed storm water BMPs in the scope of work or project description section of the plan cover sheet.
13. **Plumbing plan.** For the building permit submittal, include plumbing plan sheets that clearly indicate that all roof runoff will be directed to proposed BMPs.
14. **Site plan.** For the building permit submittal, include the locations of all BMPs on the site plan and provide a reference to the details on the civil sheets.
15. **Maintenance statement.** For the building permit submittal, on the plan sheets (typically civil sheets) reproduce documentation signed by the property owner stating that the proposed storm water BMPs (list individually) will be maintained pursuant to SBMC §22.87.030. An example statement is available in Appendix I (page 392) of the City's December 2020 Storm Water BMP Guidance Manual.
16. **Inspections.** For the building permit submittal, on the first sheet of the plans, include a list of the mandatory inspections by the City Building Inspector or City

QSP for all storm water post-construction improvements (BMP). List the inspections required for the different construction phases individually for each type of BMP. The list should include critical phases of the construction process when an inspection is necessary to confirm the BMPs are installed correctly. Also, include this text on the plans with the list of required inspections, "Inspections shall be scheduled online via Accela Citizens Access. The City will then route the request to the QSP Inspector or third-party Company."

K. Creek Protection & Restoration – Creeks Division

Staff Contact: James Rumbley@SantaBarbaraCA.gov; (805) 897-1910

REQUIRED ITEMS:

1. **No Required Items.** No additional information is required before application is considered complete.

ADVISORY ITEMS:

1. **Lighting adjacent to creek.** Creeks Division staff recommend the lighting proposed adjacent to creek is installed as far from the top of bank as possible and the light coming from the proposed light poles is directed away from the creek. Also see Planning comments regarding the Biological Resource Assessment.
2. **Creek buffer.** Creeks Division staff recommend a 50-foot buffer from the top of bank for all new development on Arroyo Burro Creek to protect water quality and the sensitive biological resources in the creek and prevent storm damage to structures during large flood events.
3. **Pedestrian path adjacent to creek.** Creeks Division staff recommend the pathway proposed adjacent to the creek be installed as a permeable surface (e.g., permeable asphalt).
4. **Creek restoration plan.** Creeks Division staff recommend a restoration plan for the creek bank and 50-foot buffer area. A qualified restoration biologist or landscape architect should develop the restoration plan. The plan should include measures for removing existing non-native vegetation and preparing the soil and creek bank for revegetation. The plan should also provide erosion control measures for the creek bank. Please provide the total planting area (in square feet) for the restoration site. Include plant numbers by species and a plant total for all native species to be installed in the restoration plan. Only native plant species of local genetic stock should be used for revegetating the creek bank and buffer area. The restoration plan should aim for a high level of diversity of species for trees and understory plants. In addition, the restoration plan should include a section on creek restoration maintenance and monitoring. The maintenance and monitoring section should include the following: responsible parties, maintenance and monitoring frequency/schedule, maintenance methods, the monitoring success criteria and methods, and an outline for annual monitoring reports.

L. Affordable Housing – Housing and Human Services Division

Staff Contact: Laura Dubbels, LDubbels@santabarbaraca.gov; (805) 564-5491

ADVISORY ITEMS:

1. **Affordable Housing Supplemental Application and Plan Required.** Prior to building permit issuance, an Affordable Housing Plan Supplemental Application and Affordable Housing Plan are required to be uploaded into Accela and must be approved by the Community Development Department Housing and Human Services Division, and an affordability covenant must be recorded on the property title. We recommend submitting the Affordable Housing Plan Supplemental Application and Affordable Housing Plan as soon as feasible to ensure adequate time for City review and preparation of the covenant for recording to avoid project delays. Details on plan requirements and a template are available on the City's Affordable Housing [webpage](#). Contact the Housing and Human Services with specific questions.

II. FEES

Planning Application fees are based on staff time to review two submittals and complete the entitlement process through decision-maker approvals. If your project requires more than two submittals before it is considered complete, a fee of one-fourth ($\frac{1}{4}$) of the current application fees will apply for each additional review. Please note that fees are typically updated annually, usually on September 1.

III. NEXT STEPS

When you're ready to submit the required information, please upload the following into the Planning (PLN) Record in the [Permit Portal](#). Once we receive everything, we'll invoice any applicable fees. After payment is made, we can continue processing your application.

- **Resubmittal Form.** Indicate on the [Resubmittal Form](#) that you are providing materials to complete your application. Note any changes to the Planning entitlements requested.
- **Written Responses.** Provide written responses to each of the REQUIRED and ADVISORY items identified in the Additional Information Required list (Section VI), indicating how each has been or will be addressed.
- **New or Updated Application Materials.** Provide new or updated materials addressing the items identified in the Additional Information Required list (Section VI).
- **Fees.** Pay any additional fees that apply.

If the requested information is not submitted within 120 days from the date of this letter, it will be considered an *unreasonable delay* of the project. During this period, you may request a one-time extension of up to 60 days, if needed. If the information is still not provided by the extended deadline, the application will expire, and any processing fees paid will be forfeited. To continue the project after the application expires, you must submit a new application and repay the initial submission fees based on the current fee schedule.

Please note for projects associated with a Preliminary Housing Application (SB 330), if the requested information is not submitted within 90 days from the date of this letter (September 17, 2025), the Preliminary Housing Application will expire.

Sincerely,

A handwritten signature in cursive script that reads "Patsy Price".

Patsy Price
Contract Planner

Enclosures:

County EHS Phase I Report Review Letter, March 6, 2025

ENGEO Third-Party Review of Fault Hazard Surface Rupture Investigation Report, May 20, 2025

cc: (sent via e-mail)
Riviera Dairy Property, LLC, rivieradairy1968@gmail.com
Record ID #PLN2025-00238

APPENDIX A: FINDINGS REQUIRED FOR APPROVAL

To approve the requested entitlements, the decision-maker(s) must be able to make the required findings of approval. To support this, your application's project plans, figures, technical studies, and narrative should clearly demonstrate how the project satisfies each of the findings.

DESIGN REVIEW

ABR PROJECT COMPATIBILITY

In addition to any other considerations and requirements specified in the municipal code, the following findings shall be considered by the Architectural Board of Review when it reviews and approves or disapproves the design of a proposed development project in a noticed public hearing pursuant to the requirements of Chapter 22.68.

1. Consistency with Design Guidelines. The design of the project is consistent with design guidelines applicable to the location of the project within the City.
2. Compatible with Architectural Character of City and Neighborhood. The design of the project is compatible with the desirable architectural qualities and characteristics which are distinctive of Santa Barbara and of the particular neighborhood surrounding the project.
3. Appropriate size, mass, bulk, height, and scale. The size, mass, bulk, height, and scale of the project is appropriate for its location and its neighborhood.
4. Sensitivity to Adjacent Landmarks and Historic Resources. The design of the project is appropriately sensitive to adjacent Federal, State, and City Landmarks and other nearby designated historic resources, including City structures of merit, sites, or natural features.
5. Public Views of the Ocean and Mountains. The design of the project responds appropriately to established scenic public vistas.
6. Use of Open Space and Landscaping. The project includes an appropriate amount of open space and landscaping.

FINDINGS FOR REMOVAL OF TREES

Before approving or conditionally approving an application for the removal of a tree pursuant to Chapter 15.24, the Architectural Board of Review shall make one or more of the following findings:

1. That principles of good forest management will best be served by the proposed removal;
2. That a reasonable and practical development of the property on which the tree is located requires removal of the tree or trees whose removal is sought;
3. That the character of the immediate neighborhood with respect to forestation will not be materially affected by the proposed removal;
4. That topography of the building site renders removal desirable;
5. That regard for the safety of persons or property dictates the removal.

TITLE 27

TENTATIVE SUBDIVISION MAP (SBMC §27.07.100)

The Staff Hearing Officer or Planning Commission shall not approve an application for a Tentative Subdivision Map per the following:

1. Compliance with state and local requirements and conditions. Approval shall be denied to any map for failure to meet or comply with any requirement or condition imposed by the Subdivision Map Act or this code. Approval shall be denied to any map for which the required information, reports, plans or agreement has not been submitted.
2. Consistency with general and specific plans. Approval shall be denied to any map which is not consistent with the General Plan or a specific plan adopted thereunder or which depicts a land division or land use which is not compatible with the objectives, policies, general land uses and programs specified in the General Plan.
3. Denial on specific finding; exceptions. Approval or recommendation thereof shall be denied to any map by the Advisory Agency and, in the event of an appeal, by the Appeal Board, if said body finds:
 - a. The proposed map is not consistent with applicable general and specific plans.
 - b. The design or improvement of the proposed development is not consistent with applicable general and specific plans.
 - c. The site is not physically suitable for the type of development.
 - d. The site is not physically suitable for the proposed density of development.
 - e. The design of the development or the proposed improvements are likely to cause substantial environmental damage or to substantially and avoidably injure fish or wildlife or their habitat.
 - f. The design of the development or the type of improvement is likely to cause serious public health problems.
 - g. The design of the development or the type of improvement will conflict with easements, acquired by the public at large, for access through or use of property within the proposed development; provided however, approval may be granted if it is found that alternative easements, for access of or use, will be provided, and that these will be substantially equivalent to the ones previously acquired by the public.
4. Access to public resources. Approval shall be denied to any map which does not provide for, have available, or offer dedication of reasonable public access to public natural resources as required by Article 3.5 of Chapter 4 of the Subdivision Map Act.
5. Water quality requirements. Approval may be denied to any map if discharge of waste from the proposed development into an existing community sewer system would result in violation of existing requirements prescribed by a California regional water quality control board. The determination of water quality control requirements relating to every subdivision shall be made at the time of map approval consideration.

March 6, 2025

Riviera Dairy Property, LLC
Attn: Raphaela Shipper
5058 Santa Susana Avenue
Santa Barbara, CA 93111
rivieradairy1968@gmail.com

Subject: Phase I Report
3845 State Street, Santa Barbara, California 93105
EH-CMP-25-00043
APN 051-010-008
GeoTracker Global ID: T0608300740

Dear Raphaela Shipper:

The Santa Barbara County Public Health Department, Environmental Health Services, Site Mitigation Unit (SMU) has reviewed the February 4, 2025 document titled *Phase I Environmental Site Assessment Report, La Cumbre Plaza, 3845 State Street, Santa Barbara, California (Phase I)* by your consultant Partner Engineering and Science, Inc. (Partner). The site is planned for redevelopment as a 443-unit rental housing development. As part of the planning process, EHS recommended that a Phase I Site Assessment be performed based upon a review of the files for this and nearby sites listed on GeoTracker. The *Phase I* documents the environmental conditions at the site and surrounding area in conformance with ASTM Practice E1527-21.

The subject property at 3845 State Street in Santa Barbara, California is located on the southeast side of South La Cumbre Road and the northeast side of Calle Real within a commercial area of the City of Santa Barbara. According to historical sources, the subject property was undeveloped prior to 1928. It was developed as part of a dairy farm between 1944 and 1965. The current structures, were developed in 1967 for Sears (Building A, two-story building) and Sears Auto Center (Building B, single-story building) and consist of concrete masonry construction. The buildings are connected via their basements. The site buildings are currently occupied by various commercial and retail sales businesses and new car storage activities.

The *Phase I* identified the following Recognized Environmental Conditions (RECs):

- Building A includes mechanical equipment, including hydraulic elevators and a box baler. Due to the presence of significant storage materials, assessment of the equipment's condition and the surrounding areas was limited.
- The auto center was formerly equipped with hydraulic lifts that were installed prior to 1977 and may have contained polychlorinated biphenyls (PCBs). It is not known

ENVIRONMENTAL HEALTH SERVICES

whether any soil sampling was conducted when the lifts were removed, or whether any other subsurface features remain in the building.

- A three-stage clarifier was present on the northeast side of the auto center building. Clarifiers generally treat hazardous waste streams produced as part of onsite auto repair operations and have the potential to act as conduits to the subsurface in the event the clarifier becomes compromised. No information was provided as to the previous service or the current condition of the clarifier.
- There is an incomplete history of hazardous waste generation for the subject property. The hazardous materials/waste reported in the site records include used oil, new oil, antifreeze, used oil filters, waste absorbents, hydrocarbon solvents, solvent mixtures, oil/water separation sludge, and automatic transmission fluid.

The *Phase I* identified the following Controlled Recognized Environmental Condition (CREC):

- A 500-gallon waste oil underground storage tank (UST) was installed on the west side of the Sears Auto Center building in 1966 and was removed in 1990. Approximately 30 cubic yards of impacted soil were excavated and disposed of offsite in August 1992. Additional soil sampling in June 1993 revealed TPH as waste oil just beneath the western edge of the former Auto Center building at a depth of 10 feet. The impacted soil could not be excavated due to the proximity of the building. The case was closed in 1996 with a Deed Notification indicating that petroleum hydrocarbons remain in the subsurface and may require future assessment and/or remediation if it becomes a threat to water quality and/or the public.

No Historical Recognized Environmental Conditions were identified at the site.

The *Phase I* identified the following Business Environmental Risk:

- Due to the age of the subject property buildings, there is a potential that asbestos-containing materials (ACMs) and/or lead-based paint (LBP) are present.

Based upon the data presented in the *Phase I*, the following recommendations were made:

- Prior to demolition or renovation of the onsite buildings, a survey should be conducted to identify suspect ACMs and LBP.
- Prior to any demolition or significant renovation activities of the onsite buildings, the areas that could not be observed should be assessed to determine the presence and condition of any unidentified subsurface features.
- Prior to groundbreaking activities, soil sampling should be conducted in areas of the buildings that previously containing mechanical equipment and subsurface features, as well as known areas of residual soil impacts from the previous waste oil tank.

After careful review of the *Phase I*, EHS has the following comments:

1. Due to the structural encumbrance of Building B, the TPH-impacted soil at the former UST could not be removed. Once this building is removed, then the impacted soil should be removed. As this is a former Leaking Underground Fuel Tank site, this work will need to be performed under the oversight of the Central Coast Regional Water Quality Control Board (CC-RWQCB).
2. EHS concurs with evaluating the mechanical equipment, including the hydraulic elevators, former auto hoists, box baler, and trash compactor, during their demolition. Likewise, if the site transformers are removed, they should be evaluated for leaks. Due to the age of the transformers and hydraulic equipment, they may have contained PCBs. If stained or odiferous soil is encountered during subsurface work around the equipment, then stop to work in that area and notify EHS.
3. EHS concurs with performing additional site assessment at Building B based upon its former use as an auto repair center. The investigation should focus on former hazardous material storage areas (such as above ground tanks), the clarifier, and the former auto hoists. EHS recommends contracting with a regulatory oversight agency, such as EHS, the CC-RWQCB, or DTSC to provide oversight for these assessment activities.
4. Any building material containing ACM and/or LBP should be removed under the oversight of an appropriate agency. EHS does not provide oversight for these issues.

If you have any questions regarding this letter, please contact Tom Rejzek at (805) 346-8216 or Sedi Heydari at (805) 698-2751. Written correspondence regarding this matter should be sent to EHS at 2125 S. Centerpointe Parkway, Room 333, Santa Maria, CA 93455 or via email to TRejzek@sbcphd.org or sheydari@sbcphd.org.

Sincerely,



Thomas M. Rejzek
Professional Geologist #6461
Certified Hydrogeologist #601
SMU Program



Sedi Heydari
Hazardous Material Specialist I
SMU Program

ec: Ms. Patsy Price, City of Santa Barbara Planning Department (pprice@SantaBarbaraCA.gov)
Mr. Dave Eadie, Kennedy Wilson (deadie@kennedywilson.com)
Mr. Greg Bishop, Central Coast Regional Water Quality Control Board
(Greg.Bishop@waterboards.ca.gov)
GeoTracker Database

sh:tmr EH-CMP-25-00043

May 16, 2025
Revised May 20, 2025

Project No.
23866.000.007

Ms. Patsy Price
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102

Subject: 3845 State Street
Santa Barbara, California

THIRD-PARTY REVIEW FOR FAULT HAZARD SURFACE RUPTURE INVESTIGATION REPORT

Dear Ms. Price:

In accordance with your request, we reviewed the referenced documents for conformance with the requirements of the City of Santa Barbara and generally accepted standards of care for investigation and evaluation of fault hazard surface rupture zones within the City of Santa Barbara, California. This review has generally followed the guidelines described in the City's Technical Report and Evaluation Guidelines (Reference 5), as well as California Geological Survey Special Publication 42, California Geological Survey Note 49, and California Geological Survey Note 48. To that end, we offer the following comments.

Based on our review, from a geologic and geotechnical viewpoint, it appears that Geocon Inc.'s (consultant) Fault Rupture Hazard Investigation Report (Reference 3) has been completed in general conformance with the City and State guidelines (References 1, 2, and 6).

DISCUSSION

The referenced investigation was completed to determine the age, location and trend of a segment of the *Mission Ridge Fault*, identified on the City-Designated Fault Hazard Zone Map, as passing through the subject property, located at 3845 State Street in Santa Barbara, California.

We reviewed the referenced Fault Rupture Hazard Investigation Report and found it to be acceptable and meets the following findings for areas requiring fault investigations.

- a. Fault investigations are required by the City of Santa Barbara for projects located within an official or preliminary Alquist Priolo earthquake fault zone and/or within a designated City of Santa Barbara fault rupture study area. The subject site has been thoroughly investigated and meets the following general requirements.
- b. Fault investigation has been conducted and signed by a California Licensed Certified Engineering Geologist and/or Professional Geologist experienced with fault investigations.
- c. A fault investigation has been performed to directly observe continuous strata across the site. Trench walls were sufficiently cleaned to expose geologic features and logged at a minimum scale of 1 inch equals 5 feet. Transects of borings and cone penetrometer tests (CPTs) were also conducted throughout the site with sufficient spacing to adequately identify continuous beds of Pleistocene material. Trenches and transects were oriented perpendicular to the regional trend of faulting.

- d. The consultant has identified the fault surface rupture zone as being constrained to a 45-foot-wide zone of deformation.
- e. The report states that the site had been previously developed and cleared of younger soil materials. Therefore, radiocarbon (C14) dating was not deemed to be practical. Thus, soil profile development techniques were used for age-dating soil deposits. Ages of soil were estimated based on comparisons with other published and dated soil profiles, to bracket ages, using the soil development index method. Soil development analysis was performed by John Helms, CEG, of Palmdale, California.

CLOSING

The consultant identified an approximately 45-foot-wide fault zone trending east-west through the project site, and also confirmed that off fault deformation does not impact local sediments. Because of previous development at the site, and removal of Holocene sediments within the fault zone, the fault has been determined to be **age indeterminant** in accordance with California Geological Survey criteria. The results of several prior studies off site along the same fault segment suggest that the fault zone may have offset early Holocene sediments in other areas off site. Therefore, the fault must be treated as active and classified as a potential surface fault rupture hazard to the proposed development, and habitable structures are not to be located over the fault trace. Therefore, the only mitigation for the hazard of surface fault rupture is avoidance of the fault trace. Based on fault features, the consultant recommends a structural setback of 20 feet from the northern edge of the fault zone and 25 feet from the southern edge of the fault zone, as depicted in the Fault Rupture Hazard Investigation Report. The fault rupture zone appears to be well constrained; therefore, we opine that the recommended setbacks reported by the consultant are reasonable to mitigate the potential for surface rupture of the Mission Ridge Fault.

In light of the findings, we request that the consultant review all final project plans and specifications to confirm that the setbacks have met the intent of their recommendations. We also recommend that the consultant provide on-site inspection of excavations by a Licensed Geologist during construction to identify any additional evidence of surface fault rupture from subsidiary faulting that may pose a potential hazard.

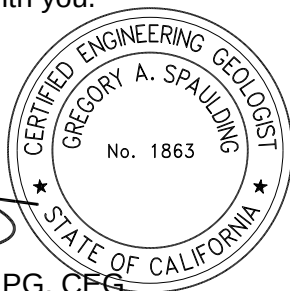
Our review relied on information provided to us by others, and we do not guarantee the accuracy of the provided information.

We trust this information meets your needs. If you have any questions, please call and we will be glad to discuss them with you.

Sincerely,
ENGEO Incorporated



Gregory A. Spaulding, PG, CEG
gas/rh/rhb/ca



Robert H. Boeche, PG, CEG

Attachment: Selected References

SELECTED REFERENCES

1. California Geological Survey. 2002. Special Publication 42, Note 49, Guidelines for Evaluating the Hazard of Surface Fault Rupture. Revised May 2002.
2. California Geological Survey. 2022. Note 48, Checklist for the Review of Engineering Geology and Seismology Reports for California Public Schools, Hospitals, and Essential Services Buildings. November 2022.
3. Geocon. 2025. Fault Rupture Hazard Investigation Report, Proposed Residential Development, La Cumbre Plaza, 3845 State Street, Santa Barbara, California, Assessor ID No: 051-010-008. March 18, 2025. Project No. W1690-06-02.
4. Geocon. 2025. Geotechnical Investigation, Proposed Residential Development, 3845 State Street, Santa Barbara, California. March 18, 2025. Project No. W1690-06-03.
5. John Helms, CEG. 2025. Soil Stratigraphy Study and Relative Age Estimates for a Fault Rupture Hazard Investigation at 3845 State Street, Santa Barbara, California. February 26, 2025. Appended to Fault Rupture Hazard Investigation Report, Proposed Residential Development, La Cumbre Plaza, 3845 State Street, Santa Barbara, California, Assessor ID No: 051-010-008. March 18, 2025. Geocon Project No. W1690-06-02.
6. URS Consultants. 2009. Technical Report and Evaluation Guidelines, Geology and Geohazards, Master Environmental Assessment. March 2009.