



LAND DEVELOPMENT TEAM (LDT) APPLICATION RESPONSE LETTER, SUBMITTAL # 2

PROJECT ADDRESS: 3805 State Street
PLN RECORD #: PLN2024-00227
DATE: Friday, September 27, 2024 – Review # 2
APPLICANT: Gelare Macon, Flowers & Associates, Inc.
gmacon@flowersassoc.com
ASSIGNED PLANNER: Patsy Price, PPrice@SantaBarbaraCA.gov
STATUS: INCOMPLETE

LDT Meeting Date: Wednesday, October 9, 2024 from 11:00 A.M. – 12:00 P.M.
Via Video Conferencing ([Join the meeting now](#))

Dear Ms. Macon:

I. INTRODUCTION / PROJECT DESCRIPTION

The City accepted the Planning Application for the subject project for 30-day review on August 30, 2024. The second submittal is in response to staff's incomplete letter dated July 3, 2024. The current project has been modified based on comments received as well as slight changes to unit and parking counts and square footages. The proposed project consists of demolition of an existing, multistory structure (Macy's) and associated parking and construction of a 684-unit mixed use rental housing project under the City's Average Unit-Size Density (AUD) Incentive Program. Existing wireless facilities are also proposed to be removed and uses discontinued as part of this project. A Vesting Tentative Parcel Map is proposed to divide the 14.9-acre legal lot into two parcels, creating an 8.7-acre site for the new development while the existing structures would remain on the other parcel. The project would include approximately 29,435 square feet of commercial space and 568,624 square feet of residential space consisting of 94 studio, 381 one-bedroom, 192 two-bedroom, and 17 three-bedroom units, a total of 856 parking spaces, 14 loading spaces, 743 bicycle parking spaces, and an open yard area of approximately 38,625 square feet with common shared amenities for residents and approximately 61,479 square feet of open space, park and plaza areas. The project would consist of six separate buildings at varying heights from two to six stories with two levels of subterranean parking for residential use and two ground level parking garages for commercial use. Site grading in the amount of approximately 98,000 cubic yards of cut and approximately 24,500 cubic yards of fill will be required to establish appropriate site drainage, infrastructure, and access throughout the

site. Sidewalks, walkways, and bicycle lanes would be improved and/or installed and multiple existing ingress/egress points would be improved and/or adjusted.

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

The information reviewed by the LDT staff included:

- Resubmittal Form
- Revised Applicant Letter prepared by Flowers & Associates, Inc., dated August 29, 2024
- Response to City Feedback Letter prepared by Flowers & Associates, Inc., dated August 29, 2024
- Response to LDT Application Letter, Submittal #1 prepared by Mullen & Henzell, LLP, dated August 13, 2024
- Architectural and Landscape Plans, dated August 29, 2024
- Concept Site Improvement Plans prepared by Flowers & Associates, Inc., dated August 30, 2024
- Concept Public Improvement Plans prepared by Flowers & Associates, Inc., dated August 30, 2024
- Vesting Tentative Map Improvement Plans prepared by Flowers & Associates, Inc., dated August 30, 2024
- Biological Resources Assessment prepared by Ecological Assets Management, LLC, revised July 25, 2024
- Traffic, Parking, and VMT Analysis prepared by Associated Transportation Engineers, dated August 14, 2024
- Preliminary Drainage Analysis and Storm Water Quality Report prepared by Flowers & Associates, Inc., dated August 28, 2024
- Fire Water Demand Memo prepared by Flowers & Associates, Inc., dated August 26, 2024
- Will Serve Letter from Southern California Edison, dated August 5, 2024
- Copies of email correspondence with City staff and County Environmental Health Services staff
- Letter from City Parks & Recreation Department approving street tree removal, dated August 29, 2024

II. COMPLETENESS DETERMINATION

The purpose of this letter is to notify you that the Planning Application for the subject project is “incomplete,” and additional information is required. The application will be placed “on-hold” until the required information is received. The required additional information is specified below. Once

the required additional information has been accepted for review, the City will complete another round of review.

III. ADDITIONAL INFORMATION REQUIRED

*The information requested below is necessary to adequately review the proposed development project. **Your application will be incomplete until all the items listed below are provided.***

A. Planning Division

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

1. Density and Affordability Calculations.

Under the “Affordability” section on Sheet G010, list the number of market rate, inclusionary, and State Density Bonus units proposed, the affordability level, and that they are proposed to be rental units.

The following is the City’s understanding of the proposed density and affordability:

- a. **Average Unit-Size Density (AUD) Incentive Program, State Density Bonus.** Based on the AUD Program, a total of 548 residential units with a maximum average unit size of 811 square feet are allowed at 63 du/acre (8.7 acres x 63 du/acre = 548 units).

The project proposes to include 39 rental units deed restricted to very low income to receive a 25% density bonus pursuant to State Density Bonus law. A 25% density bonus would allow up to 137 density bonus units (548 base density units x 25% = 137 density bonus units) for a total of 685 units. The proposal is for 684 units.

- b. **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 residential 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 unit. 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. In this case, based on the project’s 548 proposed base density units, 55 units must be provided at the moderate income level.

The project proposes to meet this requirement by providing the 39 very low income deed restricted units under State Density Bonus law and 16 moderate income deed restricted units. (Also see advisory comment re inclusionary requirements for AUD rental housing.)

2. **Visual Aids.** As stated in the [Visual Aids & Story Poles Supplemental Application](#), which is a required component of the project application, when an

exemption from the requirement for story poles is requested, design review bodies or planning staff may request other visual aids, such as photo simulations, perspective drawings, neighborhood context studies, three-dimensional aerial views, or massing models, on a case-by-case basis.

Thank you for providing 3D views of the project. However, staff has determined additional information is necessary 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. (Also see advisory comment regarding story poles). The following additional information is required:

- a. Expand the site elevations (sheets A300-A301) or provide additional elevations that include the nearest buildings adjacent to or across the street from the project site and identify the height of those buildings.
- b. Identify the height of buildings on adjacent and nearby sites shown on the building elevations (sheets A302A-A303A) and site sections (sheets A310-A311).
- c. Provide additional 3D views in the direction of view 6 on sheet A331, view 4 on sheet A332, and views A and B on sheet A334 that show the full height of the proposed buildings.
- d. Provide 3D views from or near the intersections of 1) Plaza Avenue and La Cumbre Plaza Lane and 2) Plaza Avenue and State Street that show the proposed project in relation to the retail buildings on the west side of Plaza Avenue.

3. Plans

- a. **Roof Plan.** Please label the equipment on the roof or add a legend that identifies what each of the symbols shown on the roof plan represent.
- b. **Height.** Per our July 15, 2024 email correspondence, elevation above sea level of the highest point of each structure should be shown on both the elevations and building sections. It is currently only shown on the sections. Please add this information to the elevations and identify the vertical datum used for these height measurements on the plans. Please also show these height measurements in a different color, font, or in some other way that distinguishes them from other measurements on the plans.
- c. **AUD Calculations.** We appreciate the additional information provided regarding unit sizes. However, it still does not allow for verification of the average unit size for the project as a whole (i.e., the total of the net floor area of each residential unit divided by the total residential units in the project). We understand there may be slight variations in units of the same type and that the dimensions depicted on the plans may not precisely indicate net floor area. Therefore, please add a plan sheet that includes a comprehensive list including each proposed unit and the net floor area of that unit.

4. **Forms Required for Resubmittal.** Once you have obtained all the necessary items to complete your application, you will need to upload the files to Accela Citizen Access (ACA). To do so, you will need to login to your ACA profile and navigate to: My Records > Planning > PLN20XX-00XXX > Record Info > Attachments > Add. Before uploading your new documents, be sure to name them using the following format YYYY-MM-DD.File_Name (using the date you are uploading them). In addition to your files, you must also include the following:
 - a. **Letter Response.** Please submit a copy of this letter, indicating how each of the comments contained herein have been addressed.
 - b. **Resubmittal Form.** The Resubmittal Form is available on the City website: [Resubmittal Form](#).
 - c. **Identify Changes to Project.** If, when you resubmit, your project changes in any way from the current proposal (change in the number of dwelling units, floor area, parking spaces, building height, etc.), please provide a concise explanation of all of the changes in the [Resubmittal Form](#). Be advised that changes to the project may result in additional requests for information, and if deemed significant, may require submittal of a revised application (at staff's discretion) and associated fees.

B. Engineering Division

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

1. **Tentative Subdivision Map.** The Vesting Tentative Subdivision Map is generally unclear on the bounds or intent of the subdivision. Please clearly delineate between existing and proposed boundaries of the parcels, including dimensions and APNs and address the following items:
 - a. List all three APNs that make up the legal parcel in the site information on the map.
 - b. Depict all three existing APNs that make up the legal parcel and the resulting two parcels post-subdivision including the sidewalk dedication on Hope Avenue.
 - c. Dimensions are missing from the proposed right-of-way on Hope Avenue sidewalk dedication.
 - d. Clearly show the location, width, and purpose of all proposed water and sewer easements. Proposed easements on sheet C-3 are unclear.
 - e. Clearly show the utility mains and easements, or portions of, to be abandoned. There appear to be some duplicated mains on utility plans.
 - f. The map shows the access road that is an extension of La Cumbre Plaza Lane crossing the proposed parcel boundary. Please depict on the map a reciprocal ingress/egress easement (or covenant of easement) for the shared access to the portion of La Cumbre Plaza Lane on the two proposed parcels.

Also see advisory comment regarding Vesting Tentative Map requirements.

2. **Water Main and Hydrant Location.** As stated in the July 3, 2024 review letter, sewer and water mains must be located in roadway, driving surfaces and/or soil for access and maintenance. No trees, permeable pavers, bio-retention basins, specimen plantings, objects, lighting poles or other structures are to be placed over the public water main. The existing water main and fire hydrant located in the proposed open space area does not meet this requirement. It should be relocated to the proposed driveway location.

C. Transportation Division

1. **Project Parking & La Cumbre Plaza Shared Parking.** As noted in the July 3, 2024 review letter, the La Cumbre Plaza campus relies on shared parking across parcels. Your response to this comment indicated the lease agreement between the project site and the remainder of La Cumbre Plaza will expire in 2028. However, this does not address how the project will ensure continued compliance with applicable zoning requirements for parking for the remainder of La Cumbre Plaza.

The [Project Plan Submittal Guide](#) requires the project scope to include automobile and bicycle parking information including the number of spaces and the required ratio (p. 4) and on the site plan to include numbering each space, and showing dimensions and angles, drive aisles, bay widths, maneuvering areas and accessible parking and loading areas (p. 5). In addition, vesting tentative map submittal requirements (SBMC §27.20.050.B) include identifying the location, size, and number of parking and loading spaces on the preliminary plot plan and identifying the parking requirements for the entire development with a computation showing the requirements for each dwelling unit in the development and total parking requirements in the statistical data. The project area includes the entirety of the legal lot proposed to be split. Therefore, the scope must describe, and the plans must depict, how parking will be addressed for the entire existing lot. Further, because parking is currently shared across the La Cumbre Plaza campus, the scope must explain how the parking for the entire campus will comply with applicable zoning requirements with the elimination of shared parking on APN 051-010-013 and the partial removal of spaces that cross the proposed property line and the western property line shared with APN 051-010-026.

For your reference, during the review and approval process for the tenant improvement at 3855 State Street (Bristol Farms), a comprehensive analysis of the parking for La Cumbre Plaza was completed. This analysis was based on a survey performed on February 28, 2019, by PSOMAS. A copy of the survey summary, including parking spaces totaled by parcel, is available in the archive plans for BLD2019-05853, sheet pages 16-19, 3855 State Street. Please also contact Planning staff for information on permits issued since the 2019 survey that further modified existing parking.

IV. REQUIRED APPLICATIONS

A. Applications Received

You have applied for the following discretionary approvals from the Planning Division:

1. A Vesting Tentative Parcel Map to allow the division of one parcel into two lots (SBMC Chapter 27.20), and
2. Design Review by the Architectural Board of Review (SBMC Chapter 30.220).

You have also applied and received conditional approval from the Parks and Recreation Commission for:

3. A Tree Removal Permit to remove 14 street trees along the property frontages.

B. Applications Required After Planning Approval

Based on the information that you submitted, the following applications will be required after you obtain your Planning approvals:

1. **Planning Division**
 - a. Sign Permit for directory sign and other proposed signage
2. **Building & Safety Division**
 - a. Building Permits
3. **Engineering Division**
 - a. Public Improvement Plan (C-1)
 - b. Public Works Construction Permit
 - c. Parcel Map
4. **Wastewater**
 - a. Application for New Sewer Service Connection available at <https://www.santabarbaraca.gov/waterapp>
5. **Water Supply/Distribution**
 - a. Application for New Water Service Connection available at <https://www.santabarbaraca.gov/waterapp>
6. **Transportation Division**
 - a. To be determined once detailed parking plan is provided to determine if parking waivers are required
7. **Fire Department**
 - a. Fire Sprinkler Permit per building
 - b. Mixed Use Alarm Permit
8. **Creeks Division**
 - a. Compliance with Tier 4 SWMP requirements

V. ADVISORY INFORMATION

Items noted as “ADVISORY” are not required to complete your application but are important to be aware of as they may be required at a future date (e.g. prior to building permit issuance) or may impact your project’s consistency with City development standards.

A. Planning Division

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

1. **Inclusionary Requirements for AUD Rental Housing.** The AUD Incentive Program requires rental housing developments of 10 or more units to provide at least 10 percent of the total residential units, excluding density bonus units, at a rent affordable to moderate-income households (SBMC §30.150.110).

In this case, based on the project’s 548 proposed base density units, 55 units must be provided at the moderate income level. The project proposes to meet this requirement by providing the 39 very low income deed restricted units under State Density Bonus law and 16 moderate income deed restricted units.

The AUD Incentive Program provides exemptions from the inclusionary requirement for certain types of projects, including projects that provide 100 percent of units for lower-income households. Because the project is proposing less than 100 percent of the units for lower-income households, it is required to provide a minimum of 10 percent of units for moderate-income households, in addition to any affordable units proposed under State Density Bonus law, to qualify for the additional density and reduced zoning standard incentives offered by the AUD Program. The project must be revised to include a minimum of 10 percent moderate-income units to qualify for the AUD Program.

2. **Height Waiver.** Projects developed in accordance with the AUD Incentive Program in the C-G/USS Overlay Zone have a 45-foot height limit. However, waivers from development standards are afforded by State Density Bonus Law if the development standard would preclude the project from building at the density entitled by state law. Per the application materials, the additional height is necessary to accommodate the density bonus, and therefore the project proposes a waiver to exceed the height limit. Staff concurs that the project qualifies for a density bonus waiver for relief from the 45-foot height limitation.
3. **Front Setback Waiver.** Non-residentially zoned lots subject to the USS Overlay Zone are subject to a front setback requirement of 10 feet. Front setbacks are measured from the boundary of the street dedication if a portion of the property is within a street dedication (SBMC § 30.15.100.A). The project includes a request for a waiver of front setback requirements along State Street, Hope Avenue, and Plaza Avenue to allow portions of the structures to encroach within the 10-foot setback. Given the size of the property and the proposed variation in setbacks along the street frontages, staff concurs that the project qualifies for a density bonus waiver for relief from this standard.
4. **Open Yard Waiver.** The project requests a waiver of the AUD alternative open yard requirement of 15 percent (56,846 square feet) of net lot area and proposes

a reduced open yard area of 10.2 percent (38,625 square feet). Staff concurs that the project qualifies for a density bonus waiver for relief from open yard area serving the proposed residential use.

5. **Nonresidential Growth Management Program.** To temper the overproduction of nonresidential development, the City's Nonresidential Growth Management Program caps nonresidential development citywide and allows for transfer (sale) of nonresidential square footage within the three geographic Development Areas (i.e., Downtown, Outlying and Airport). SBMC Chapter 30.170 provides details on the cap, existing nonresidential square footage rights, rules for additions, annual allocation of new nonresidential square footage, and transfer requirements. Because existing nonresidential development that is demolished can be used for future development ("demo credit"), on the same site or transferred for development elsewhere, it is important for all applications to accurately track existing nonresidential square footage to remain, to be demolished, and to be constructed.

We note the addition of the "Nonresidential Growth Plan" line in the Project Statistics section of Sheet G010. Please also include the proposed nonresidential floor area to be constructed and calculate the demolition credit that would remain for this site in this section to ensure this information can be easily tracked.

6. **Alternative Energy.** The City of Santa Barbara supports the use of alternate energy sources to conserve energy resources and reduce carbon emissions that contribute to climate change. Please explain how your project complies with the following:

- a. **Solar Energy.** Installation of solar photovoltaic arrays as part of new construction, redevelopment, and significant remodel projects should be provided in accordance with General Plan Policy ER6.

Multi-family residential projects of three or more units require provision of a minimum 2 kW system per unit if physically feasible.

Commercial and industrial projects require provision of a minimum of 5 watts of photovoltaic panel systems for every net new square foot of building floor area; or a photovoltaic system sized to meet a minimum of 30% of the average projected energy demand for the structure, whichever is lower.

The resubmittal response letter indicates that no solar is proposed for commercial uses as no net new commercial square footage is proposed. The information on Sheet A207 indicates slightly less than 1 kW per unit could be accommodated on the roof. Please clarify whether it is the applicant's position that the provision of 2 kW per unit is not physically feasible.

Also see comment advisory Building & Safety regarding compliance with solar photovoltaic system building code requirements and ensure there is adequate space within the project to comply with these requirements.

7. **Technical Studies.**

Staff has conducted a preliminary review of the project, as submitted, against potential environmental issues and anticipates that the currently proposed project would not qualify for an exemption from CEQA. The following technical studies will be required at the time a formal environmental evaluation of the project commences, to determine if the project may have a significant effect on the environment. Additional technical analyses or revisions to technical reports that have been submitted may also be required during formal environmental review.

- a. **Air Quality.** Please provide an Air Quality Technical Memorandum with emissions calculations for construction and operational criteria air pollutant emissions. This should include all emissions directly and indirectly associated with the project including stationary, energy, mobile, solid waste, water and wastewater source emissions. Please quantify greenhouse gases associated with the project. Include an analysis of project consistency with Santa Barbara County Air Pollution Control District Rules and applicable air quality management plans. Include an analysis of effects on sensitive receptors. We note the application materials indicate this report is in the process of being prepared.
 - b. **Noise.** Please provide a Noise Assessment that analyzes construction-related and operational noise levels and any effects on sensitive receptors. We note the application materials indicate a Noise Assessment is in the process of being prepared.
 - c. **Hazardous Materials.** Review and acceptance of the Phase 1 ESA by Santa Barbara County Environmental Health Services (EHS) is required to determine if there are any recognized Environmental Conditions (REC) onsite. We note that EHS review is in process.
 - d. **Photometric Study.** A photometric study or other lighting information will likely be requested once formal environmental evaluation of the project has begun and/or prior to Final Design Approval.
8. **County Air Pollution Control District (APCD) Comments.** The information requested in APCD's June 28, 2024 letter, which was attached to the City's July 3, 2024 review letter, will be required for environmental review.
9. **AUD Program Inclusionary Moderate Income Housing Plan Requirement.** Every AUD rental housing development subject to SBMC §30.150.110.A shall include a Moderate Income Housing Plan that meets the standards of §30.150.140 as part of the building permit application submittal. No application for a building permit may be issued until a Moderate Income Housing Plan is submitted to and approved by the Community Development Director as being complete. The Community Development Director may require additional information reasonably necessary to clarify and supplement the application or determine the consistency of the proposed Moderate Income Housing Plan with the requirements of SBMC Chapter 30.150.

10. **Material Specifications.** As it is anticipated that this project will have a limited number of hearings, additional architectural details should be added to the project plans as soon as possible to ensure ABR can provide feedback on these elements as early in the process as possible. This should include, but is not limited to, large-scale drawings of significant architectural elements, such as entrances to paseos, handrails, guardrails, arches, columns, window and door details, etc., as noted on the [Project Plan Submittal](#) handout.

11. **Story Poles.** Story poles are required be installed for this project, as outlined in the [Visual Aids & Story Poles](#) Supplemental Application, at least 7 days prior to the Project Design Review and Staff Hearing Officer site visits and must remain in place through the hearings.

The application materials request an exemption from the story pole requirement.

Staff and ABR may approve an exemption to the story pole requirement prior to determining application completeness or during Concept Review. As Concept Review has not yet occurred for this project, the exemption request has not yet been considered. The ABR will consider the story pole exemption request at its next hearing for the project.

12. **Design Review Compatibility Analysis.** Pursuant to SBMC §22.68.045, the ABR will consider project compatibility findings when it reviews and approves or disapproves the design of a proposed development.

13. **Additional Fees.** Projects that require a third or subsequent Planning Application submittal prior to completeness are required to pay one-fourth (¼) of the current application fees. In this case, the fee would be \$9,075.75.

14. **Additional Advisories.** The applicant has acknowledged the following advisory comments:

a. **School Facilities.** Hope Elementary School District recently completed a study of projected facility needs based on anticipated residential development within district boundaries. Project specific and cumulative impacts on public services, including school facilities, will be analyzed as part of the environmental review of the project. We recommend coordinating with Hope Elementary School District and Santa Barbara Unified School District to share information regarding the proposed project so aid the district's gathering of information that will be necessary to inform the environmental review.

b. **County Environmental Health (EHS).** The following comments were provided by staff at the Leaking Underground Fuel Tanks (LUFT) and Site Mitigation Unit, Santa Barbara County Public Health Department:

Based upon data on GeoTracker there are not LUFT or SMU sites nearby that would be expected to impact the subject site.

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 7,000 feet away.

- c. **Design Review.** As part of the pre-application review process for this project, the Planning Commission provided comments and recommendations regarding the proposed design and improvements and the project's consistency with the City's General Plan. Per SBMC §30.150.060.F, these comments are provided to the ABR for consideration in their review of the project. We recommend providing a written response and/or being prepared to respond to how the project addresses the Planning Commission's comment, as well as prior ABR comments, at the next ABR hearing.

B. Building & Safety Division

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

The following conditions and comments are intended to assist in identifying any potential deal breakers; staff recommends you provide a response to them with your next submittal to avoid late hits/ redesign. Note, this is not a comprehensive plan review. A comprehensive plan review will be performed when the project is submitted for a building permit.

1. **Funding.** Funding source is required in order to complete review. Be advised that funding sources may impact the code requirements that apply to the project. The following should be considered as you develop the project, as they might require adjustments to the site design:
 - a. 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.
 - b. Provide total accessible vs adaptable dwellings units per CBC 11A or 11B as applicable depending on funding.
 - c. If privately funded; all adaptable units must comply with CBC 1128A which includes requirements for door widths, accessible routes, bathroom and kitchen designs.
2. **Geotechnical Requirements.** Please be advised that the Seismic Design Category was not indicated in the provided Geotechnical Report and that it is not uncommon for areas within the City of Santa Barbara to be considered Seismic Design Category E. Also, due to the presence of liquefiable soils it will be necessary for the Structural Engineering Team to analyze and consider all reports, tests, and supplemental information (geotechnical or otherwise) when determining the methods and practices utilized to construct foundations and drainage systems.
3. **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.
4. **Energy & Green Requirements.** Considerable changes have occurred to the 2022 California Green Building Code in regard to infrastructure requirements for

Electric Vehicle Charging Stations per Sections 4.106.4.2 & 5.106.5.3 (2022 CGBSC): New construction to provide electric vehicle infrastructure and facilitate electric vehicle charging shall comply with Sections 4.106.4.2 & 5.106.5.3.1 and shall be provided in accordance with regulations in the California Building Code and the California Electrical Code.

The plans lack sufficient information to perform a review of major potential code issues; at minimum provide the following:

- a. **Sheet G010:** Please clearly define the Required and Provided counts for EV Charging Stations. Define the required percentages of each type and each type provided. See below for what we tabulated. Please verify these numbers.
- b. **Sheets A110, A200 & A201:** It would be very helpful to define each EV station type by color to make it easier to plan review and inspect.
- c. **Sheets A110, A200 & A201:** Provide full dimensions of the EV stations. Provide widths and depths and required clearances.
- d. Please know that projects of this nature are time consuming and may require additional comments. The following is based on an initial evaluation:

Commercial Provided:

EVCS = 6

EV Cap = 16

Commercial Required:

EVCS = 6

EV Cap = 11

Residential Provided:

EVCS = 70

EV Ready = 270

EVCS Van = 9

Residential Required:

EVCS = 43

EV Ready = 214

EVCS Van = 2

- 5. **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.

6. **Building Permit Application Comments.** The plans lack sufficient information to perform a review of major potential code issues; at minimum provide the following:
- 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 (when submitted) to show compliance with Section 5.408 (2022 CGBSC) and all applicable subsections. Public Works will review the 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. Thank you for providing a topographical site plan. Please include an actual 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. A soils report needs to be included in the plans.
 - 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 will need to be contained within the 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. Please clarify each type of construction listed, either IA or IB and IIIA or IIIB.
- 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 plane 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. Show maximum travel distance. Delineate and annotate any rated corridors, interior egress stairs, and/or exterior egress stairs.
- r. Underground parking structures to comply with applicable Sections of Chapters 4 & 5 (2022 CBC) as well as Section 120.6(c) (2022 CEnC).
- s. For commercial (public accommodations). Project to provide full compliance with Chapter 11B (2022 CBC). Delineate and annotate on plans all accessibility elements at commercial occupancies, including accessible restrooms, accessible seating areas, accessible clearances at common use areas.
- t. For residential areas, depending on funding sources, provide number or required accessible units, adaptable units, units with communication features and units with visual features. Note if project is subject to UFAS, units with communications and visual features cannot be combined with accessible units.
- u. Energy & Green Requirements. Project to comply with the Mandatory PV & Battery Requirements for New Construction per 140.10(a) & (b) (2022 CEnC).
- v. Energy & Green Requirements. Please provide a commissioning plan per Section 120.8 (2022 CEnC) & Section 5.410.2 (2022 CGBSC)
- w. Clarify whether drop-off/pick-up will be provided and show accessible drop-off and loading zone per CBC 11B-503.3.
- x. Review all pedestrian walks throughout the site to ensure slopes at pedestrian walks are within minimum slopes for running slope (5%) and cross slopes (2%). For example on sheet C-10, the pedestrian walk adjacent to the southern bike path exceeds 5% running slope; some areas show 5.5% & 7.9%.
- y. 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.

- z. Prior to the start of the project an address must be visible from State Street and Hope Avenue for emergency vehicles as well as City staff.
- aa. Provide a prominent note on cover sheet containing work hours for project.
- bb. Please know that projects of this nature are time consuming and may require additional comments.

C. Engineering Division

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

1. **Vesting Tentative Map Requirements.** In addition to the Tentative Map submittal requirements identified in Section III of this letter, maps proposed as vesting maps must meet special requirements as specified in SBMC §27.20.050.B. Currently, the submitted materials do not meet some of these requirements. If the next submittal does not address the requirements of SBMC §27.20.050.B, the map will be processed as a tentative map rather than a vesting tentative map. The special requirements of SBMC §27.20.050.B missing from the current submittal include:
 - a. A preliminary plot plan of the proposed development, drawn to scale, showing, as a minimum:
 - i. The location, dimensions, and uses of all existing and proposed buildings and structures on the subject property on the entire legal lot;
 - ii. Location, size and number of parking spaces and loading spaces on the entire legal lot;
 - iii. All interior circulation patterns including streets, walkways, bikeways, and connections to existing or proposed arterial or connector roads and other major roads on the entire legal lot;
 - iv. Location and use of all buildings and structures within 50 feet of the property's boundaries;
 - v. Location, height, and material of all existing and proposed walls and fences;
 - vi. Location and amount of land devoted to public purposes, open space, landscaping and recreation.
 - b. Statistical data for both proposed parcels:
 - i. Height, ground floor area, and total floor area of each building;
 - ii. Building coverage expressed as a percent of the total net area of the property;
 - iii. Percentage of the net or gross land area of the property devoted to landscaping, open space and/or recreation, as applicable;

- iv. Parking requirements for the entire development with a computation showing the requirements for each dwelling unit in the development and total parking requirements.
 - c. Colors and materials, of buildings and structures proposed to be constructed;
 - d. A statement of energy and water conservation measures and/or devices incorporated into the construction and occupancy phases of the development;
 - e. Measures to be used to prevent a reduced nuisance effect such as noise, dust, odor, smoke, fumes, vibration, glare, traffic congestion, and to prevent danger to life and property.
2. **Public Improvement Plan.** Bottomless drop inlets proposed in the right-of-way on State Street and Hope Avenue are an improvement over underground chambers, however the number of inlets over the relatively small area is disproportionate. Consult further with Public Works Engineering for a more balanced approach to right of way stormwater management.

D. Wastewater

Staff Contact: Mariana Cruz, MCruz@SantaBarbaraCA.gov; (805) 568-1086

1. **Wastewater Collection System.** Based on the fixture calculations provided by the applicant, the City does not foresee any upgrade requirements and the existing Wastewater Collection System has the capacity to serve this project. When applying for a building permit, please provide the current expected fixture calculations to determine if upgrades to the system are required at that time. Any public improvements or upgrades to the collection system required by this project, will be the full responsibility of the applicant and must be completed to the City's standard details. The City of Santa Barbara's Municipal Code (§14.44.150) requires all work on public sewer mains to be completed by the City's contractor.
 - a. All three scenarios provided by the applicant were used to run the model. Please note the second scenario resulted in minor surcharge to the collection system.
 - b. Please contact staff at EZambrano@SantaBarbaraCA.gov for a copy of the model.
2. **Sewer Lateral Identification.** Sewer laterals are owned and maintained by private property owners. To obtain the most accurate information on laterals servicing the property, applicant should hire an inspector to confirm the location of the sewer lateral(s) servicing the property.
 - a. Applicant may also elect to hire the City's wastewater collection system staff to mark and locate sewer lateral connections. The fee for this service can be found in the Wastewater Fee scheduled listed at www.SantaBarbaraCA.gov/WaterRates.

3. **Sewer Lateral Inspection Program.** The Applicant has acknowledged the following Sewer Lateral Inspection Program comments:
 - a. Please note the City's Sewer Lateral Inspection Program (SLIP) for Commercial Properties applies to this property. A SLIP inspection will be required on a 15-year cycle for this project.
 - b. A submittal of a CCTV Sewer Lateral Inspection by a City Certified CCTV inspector via Forward Lateral is required prior to obtaining a building permit for this project. The list of City Certified CCTV inspectors is available on the City of Santa Barbara's website at www.SantaBarbaraCa.gov/SLIPplumber. Inspections must be conducted by a plumber on the certified list and submitted via Forward Lateral within 60 days of inspection, all other submissions will be rejected. If the result of the inspection requires repairs, repairs must be completed and signed off by SLIP staff prior to obtaining final sign-off on the project.
4. Applicant has acknowledged the following advisory comments:
 - a. **Utility Plan.** When applying for a building permit clearly show all existing (E) and new (N) sewer service laterals along with identification of service lateral size, abandon or protect in place, and connection to the City's sewer main.
 - b. **Fats, Oils, and Grease (FOG) Program.** If any use of the property falls within the definition of a Food Service Establishment as defined in SBMC Title 16.02.040 definitions, the occupant will need to comply with the City's FOG Program. For reference or questions, see section 16.04.080B of SBMC or contact the City's Wastewater Resources Compliance Specialist at (805) 568- 1005.
 - c. **Grease Control Device.** Grease Control Device must be installed per City of Santa Barbara standard details. Dish machine discharge and mop sink must not connect to the Grease Control Device (GCD). For more information, contact the City's Wastewater Resources Compliance Specialist at (805) 568-1005. Standard details can be found at www.SantaBarbaraCA.gov/FOG
 - d. **Wastewater Pre-Treatment Program.** If occupant has potential for industrial discharge to the City wastewater system, the development shall comply with Federal EPA regulations and the City's Pre-Treatment Program.
 - e. **Wastewater Discharge.** Only sewer waste is to be discharged into the City sewer system, per SBMC §14.44.060. Storm drains, roof drains, irrigation lines, etc., are prohibited from connecting to any new and/or existing sewer laterals or sewer mains.

E. **Water Distribution**

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

1. **Water Model.** Water system upgrades may be required to adequately serve this project. A water model will be required to verify existing water infrastructure will be adequate for both domestic and fire flows. Once the application is complete, the City will run a water model for the project.
2. **Water Service Sizes.** Please add the size of all proposed water services (e.g.: domestic, fire, landscape) to the civil plans.
3. **Water Distribution Design.** Applicant has acknowledged the following advisory comments for consideration during the design and permitting process:
 - a. Field verification of existing water mains is needed prior to construction.
 - b. Coordination between City of Santa Barbara Water Distribution and Construction teams is needed with regards to design.
 - c. Existing water mains and water main relocation(s) need to be located in roadway, driving surfaces, and/or soil.
 - d. Backflows are required at residential master meters(s), irrigation meter(s), commercial meter(s) and fire line(s)
 - e. All backflow assemblies are to be located as close to the POC (street level), while remaining on private property, as possible.
 - f. There is not adequate space for all the residential meters in the public right-of-way, a residential master meter with vault is required to be installed in the public right of way for all master meters.
 - g. Booster pumps may be required on the customer side to supply adequate pressure to the upper floors.
 - h. Any private fire line with hydrants requires an in-line meter with a double check backflow.
 - i. No trees, permeable pavers, bio-retention basins, specimen plantings, objects, lighting poles or other structures are to be placed over the public water main.
 - j. City Water Distribution will only restore asphalt, concrete, or dirt if excavation of a public water main is required.

F. **Water Supply**

Staff Contact: Katie Munster, KMunster@SantaBarbaraCA.gov

1. **Water Supply Design.** The following comments are for consideration during the design and permitting process:
 - a. Each residential unit must be served by a dedicated private water sub-meter. The sub-meter must be located on private property. All water provided to each unit must be metered (not just hot or cold). The 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 sub-

meter installation requirements, billing requirements, sub-meter location requirements, and tenant access requirements.

- b. A fixture count will be required to determine the correct meter size for the residential master water meter.
- c. A City master meter in the public right-of-way is required to serve the private sub-meters. It may only serve residential uses.
- d. Commercial space(s) must have their own water meter(s) located in the public right-of-way. The City recommends separately metering each commercial space.
- e. A dedicated irrigation meter in the public right-of-way is required if the irrigated area exceeds 1,000 square feet.
- f. Show all meters on plans. Label each meter with the proposed size and what it will be serving. Note if existing meters will be abandoned or retained. If retained, note what they will be serving.

G. **Water Conservation**

Staff Contact: Katie Munster, KMunster@SantaBarbaraCA.gov

1. **Landscape Water Conservation.** The applicant has acknowledged the following advisory comments to be addressed prior to Final Design Approval:
 - a. Be advised that all new/revised landscape areas shall comply with the City of Santa Barbara's Water Efficient Landscape Standards, SBMC §14.23.005. As a mixed use or residential project, 80% of plant material will need to be low water using with <30% ETo.
 - b. An irrigation plan will also be required during the building permit phase. Find more details at www.santabarbaraca.gov/WELS.

H. **Transportation Division**

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

1. **Sight Visibility at Driveways.** Demonstrate compliance with sight visibility at driveways and intersections per 30.140.230. Remaining driveways to show sight visibility are: a) Plaza Avenue at State Street, b) sight visibility on both sides of the driveways adjacent to Building A, B, and the traffic loop onto Plaza Lane (it appears there is an obstruction next to Building A's driveway), c) sight visibility on both sides of the driveways at State and Hope. Please see Civil Drawing comments below because a couple of the driveway configurations will change and new sightlines will need to be redrawn.
2. **Vehicle Ramps.** On Sheet C-11, please confirm the first and last 8 feet of the ramp does not exceed 6 percent for Building C/D. Please confirm the first and last 10 feet of the ramp does not exceed 8 percent for Buildings A/A-1 and A2.
3. **Vehicle Maneuverability.** Provide a hard copy plan set to scale to confirm vehicle maneuverability.

4. **On Site Loading.** Thank you for providing Sheet A504 with autoturn analysis of various vehicle turning movements. Please update Sheet A504 to address:
 - a. Figure H. If this is proposed as a senior facility, please show with an EasyLift vehicle and not a standard vehicle. It is anticipated EasyLift will provide service to the facility residents.
 - b. Figure 14: Please show 26' truck (FedEx/UPS). Also, as designed that sized truck cannot fit in a parking space. Where will these trucks park to unload/load?
5. **Tandem Parking.** Please confirm that the 50 tandem spaces serve only one unit per each tandem parking space as required by Municipal Code/Access and Parking Standards.
6. **Civil Drawing Corrections.** See attached marked up plan set.
 - a. **Sheet C-1:** Traffic signal modification plans are needed for the State/Plaza Avenue intersection. Add a note to replace traffic signal conduit at Plaza Avenue/State. Add a note to replace traffic signal conduit from pull boxes back to home run box. Please replace 1-A-10 pole with A-16 streetlight. Convert south leg of Plaza Lane at State Street to commercial driveways (dustpan style). See City Engineering Standards H-03.1. See north leg of State and Hitchcock as an example nearby (Estancia Development). Make sure driveway is concrete in right of way.
 - b. **Sheet C-3:** Call out width of the right turn lane. It should be at least 11 feet in width so buses do not encroach on bike lane when stopped.
 - c. **Sheet C-4:** Signal modification plans are needed for State and Hope intersection. Call out the mast arm signal pole to be relocated. Call out the traffic signal cabinet to be relocated. Please note moving the traffic signal cabinet will require rewiring the intersection and potentially the need to replace conduit at the intersection legs.
 - d. **Sheet C-5:** Please make same comments on Sheet C-5 that are required on Sheet C-4.
 - e. **Sheet C-8:** Capture the RRFBs with crosswalk lighting on the electrical plans. The drawing of the pedestrian refuge island is the right concept, with these minor corrections: a) Reduce gap/opening to 10 feet (this will require the nose of the island to move slightly north). If the gap is too wide vehicles will try to drive through it; b) make the island 8 feet wide leaving 1 foot shy distance from center left turn lane striping. Convert the driveway at Hope Avenue and La Cumbre Plaza Lane to commercial driveways (dustpan style). See City Engineering Standards H-03.1. See north leg of State and Hitchcock as an example nearby (Estancia Development). Make sure driveway is concrete in right of way.
7. **Bike Parking.** The proposed alley rack does not meet City Access and Parking Standards for two points of contact. Bicycles are easy to tip over with this rack design. We can explore alternative rack designs at the applicant meeting.

8. **Vehicle Driveway Queuing.** Additional information is needed to verify the queuing analysis at Plaza Lane for NB and WBLT. Ultimately, the queuing analysis needs to reflect build out of all parcels within the La Cumbre Plaza area (i.e. Macy's, LC Plaza, Sears) plus existing retail on the western end. Please address the following:
 - a. How was the background volume set established (need to remove existing Macy's, La Cumbre Plaza, non-La Cumbre Plaza Retail (strip mall adjacent to La Cumbre Plaza on western end) and Sears traffic from existing)?
 - b. Show trip generation and assignment for build out at Macy's, La Cumbre Plaza, and Sears sites. Then we can understand/evaluate future buildout volumes for the NB and WBLT movements.
 - c. Provide the traffic signal timing settings used. The cycle length at Plaza is driven by busier intersections along the corridor, so confirm that ATE didn't just click optimize cycle length and splits in synchro.

Before any of the above questions are addressed, the City Transportation Team would like to meet with ATE.

I. **Fire Department**

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

1. **High-Rise Classification.** The height of proposed buildings is very close to the threshold of a High-Rise Structure. If the buildings reach the requirements for a High-Rise Structure classification, it may be necessary to add emergency equipment and/or upgrade Fire Department equipment in the immediate area.
2. **Emergency Access.** Suitable access for emergency vehicles must be provided, including appropriate slope, all-weather surface, turnaround and maneuvering in accordance with SBMC §8.04.020.
3. **Fire Hydrants.** New fire hydrants will need to be installed as part of your project within 300 feet of commercial and within 500 feet of residential uses. See SBMC §8.04.020, Sections 507.5.1 & 507.5.1.1.
4. **Fire Sprinklers.** Each building 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. Fire sprinkler systems require a separate "FIR" permit through the Fire Department in Accela Citizen Access prior to Building Permit issuance.
5. **Sign Directory.** Mixed-use buildings, apartment and hotel/motel buildings, and campus style properties require a sign directory to ensure timely access by emergency staff during an emergency per SBMC §8.04.020, Section 505.3. Signs require a separate "SGN" permit through the Planning Division in Accela Citizen Access. You will need to obtain approval of your sign application prior to Building Permit approval.

6. **Mixed Use Fire Alarm Permit.** A permit for a mixed use fire alarm will be required for the project. Fire alarm permits require a separate “FIR” permit through the Fire Department in Accela Citizen Access prior to Building Permit issuance.

J. **Creeks Division**

Staff Contact: James Rumbley, JRumbley@SantaBarbaraCA.gov (805) 603-1399

1. **Storm Water Management Program.** The comments below must be addressed before Design Review Final Approval:
 - a. For all storm water retention chamber details, clearly identify the depth of gravel proposed above and under the chambers. Currently, this is not clear. Also, specify the subgrade soil compaction as a maximum of 90%. Specify the gravel around the chambers as washed and open-graded. Remove any proposed geotextile along the subgrade soil. It is okay to use a geogrid instead.
 - b. For each chamber system location, on the grading and drainage plan, identify the precise location for each inspection port and manhole for maintenance. In addition, specify the elevation of the subgrade soil layer for each chamber system. It must be demonstrated that there will be at least five feet of separation between the subgrade soil and the measured ground water (153’ per the storm water report). Also, in the sections provided on sheets CD-1 and CD-2, include each chamber system.
 - c. For the storm water planter detail, demonstrate how the pipe joints will be water-tight, so the planter will retain water. Also, clarify that the provided ponding depth will be above the mulch layer.
 - d. Demonstrate how storm water collected in the proposed 17,000-gallon cistern will be utilized on site. Include the locations of all connected lines and emitters and planter square footages. Also, provide an analysis in the storm water report regarding how long it will take to use all collected water considering the amount of proposed vegetated dispersal area.
 - e. On the grading and drainage plan, add invert elevations and slopes of each pipe for the complete drainage system. Include all inlet and outlet pipe elevations for all proposed underground cistern and infiltration chamber system, as well.
 - f. On the grading and drainage plan sheets, identify each proposed storm water improvement with a call-out and note and include a reference to the cross-section detail location.
 - g. For the permeable paver detail on sheet SW-5, specify the make and model of proposed permeable pavers.
 - h. In the storm water report, for the drop inlets proposed in the right of way, include the completed infiltration BMP worksheet (or similar equivalent) found in Appendix D of the City’s Storm Water BMP Guidance Manual to demonstrate how the stated capacities were calculated.

- i. On the public improvement plans, on detail 1 on sheet CD-1 for the proposed storm water drop inlets specify the compaction of the subgrade soil as 90%. Also, specify the gravel layer as washed and open-graded. Also, include the placement of catch basin screens in the opening of each catch basin, per City standard detail Note 19, D-01.0.
2. **Storm Water Management Program.** The comments below must be addressed on the building permit submittal:
- a. Provide a plumbing plan that clearly demonstrates how storm water in each DMA will be tributary to all proposed storm water improvements.
 - b. Include a description of storm water improvements (BMPs) in the scope of work or project description section of the architectural plan cover sheet.
 - c. Include the locations of all proposed storm water improvements (BMPs) on the site plan and provide a reference to the details on the civil sheets.
 - d. Include the amount of proposed new impervious area, the amount of proposed replaced impervious area, and the amount of removed impervious area on the plan cover sheet and in the storm water report. Make sure to itemize each feature (i.e., provide the square footage of every improvement individually so it is easier to double check the areas on the scaled site plan). For clarification, please refer to definitions below:

Proposed New Impervious Area – area where new impervious area (e.g., hardscape and roof) is proposed where there is existing pervious area (landscaping, permeable pavement, etc.).

Proposed Replaced Impervious Area – area where new impervious area (e.g., hardscape and roof) is proposed where there is currently existing impervious area (e.g., hardscape and roof).

Proposed Removed Impervious Area – area where new pervious area is proposed (landscaping, permeable pavement, etc.) where there is currently existing impervious area (e.g., hardscape and roof).
 - e. Have the property owner sign and date the storm water improvement maintenance statement on sheet G-1.
 - f. Move the mandatory storm water improvement inspections to the architectural plan cover sheet. Also, for all impermeable membrane inspections, specify this is located on the vertical sides of improvements only.

K. Parks & Recreation Department

Staff Contact: Sean Stewart, SWStewart@SantaBarbaraCA.gov, (805) 897-1976

1. **Proposed Open Spaces.** Please provide further detail on the plazas, paseos, and park areas described as community and public open spaces and what amenities are proposed (e.g., tables, playgrounds, picnic/gathering areas, restrooms, pet friendly areas). Consider expanding open space areas and

providing a range of passive and active recreational opportunities. The Upper State Street Guidelines call for *Activity Nodes* such as pocket parks and recreational opportunities that create an animated pedestrian experience and provide a sense of place. Modern recreational amenities consider factors such as accessibility, diversity, inclusivity, multigenerational users, wellness, mindfulness, and community. Please consider incorporating these aspects into the project design for the benefit of users. Understanding these details will help the review team determine policy consistency and environmental impacts.

VI. ENVIRONMENTAL REVIEW

In order to complete environmental review for this project, as mandated by the California Environmental Quality Act (CEQA), staff will need the information identified in Sections III and V of this letter.

Once the formal planning application has been deemed complete, staff will begin the environmental review of the subject project. A final determination on the appropriate level of environmental review will be made once all necessary information has been submitted.

Based on staff's initial review, the project does not qualify for a Categorical Exemption under CEQA Guidelines, and an Initial Study will be required to determine the appropriate level of environmental review (i.e., Negative Declaration or Environmental Impact Report).

VII. NEXT STEPS

Submit the required additional information specified in Section III of this letter online through Accela Citizen's Access and contact me when you have done so. This information should be submitted within 30 days of the date of this letter¹.

This letter constitutes the City of Santa Barbara's written identification of specific information that remains needed to complete the application. Please note that pursuant to California Government Code, Section 65941.1 (d), the development proponent shall submit said information to the City within 90 days of receiving this letter. If the development proponent does not submit this information within the 90-day period, then the preliminary application shall expire and have no further force or effect. If you wish to pursue the project, a new, full and complete application as specified in the Submittal Requirements handout for the appropriate hearing body and payment of all applicable fees will be required.

VIII. CONCLUSIONS/GENERAL COMMENTS

Your application has been deemed "incomplete;" however, you may appeal the decision to require additional information. An appeal must be filed at the Community Development Department's Planning and Zoning 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.

These comments constitute your 30-day Planning Application review. An Applicant meeting has been scheduled via Microsoft Teams, as noted on page 1 of this letter, with staff from the

¹ In some instances, the requested information cannot be provided within 30 days of the date of the letter stating the requirement for additional information. Please contact me as soon as possible to discuss any additional delay.

3805 State St. (PLN2024-00227)

LDT Application Response Letter #2

September 27, 2024

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Planning, Engineering, Water Resources, Transportation, and Building & Safety Divisions and the Parks and Recreation and Fire Departments. Please review this letter carefully prior to our scheduled meeting date. We will answer your questions on the 30-day Planning Application review comments at that time. If you do not feel it is necessary to meet with staff to discuss the contents of the letter or the project, please call me at (805) 564-5470, ext. 4582 by **Monday, October 7, 2024**. If we do not hear from you by this date, we will assume that you will be participating in the scheduled meeting. If you have any general or process questions, please feel free to contact me.

Sincerely,

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

Patsy Price, AICP
Contract Planner

Attachments:

1. Marked up civil plan set

cc: (sent via e-mail, w/o attachments)
Matthew Taylor, MCP Santa Barbara, LLC, mht@amcapgrp.com
Record ID #PLN2024-00227