



LAND DEVELOPMENT TEAM (LDT) APPLICATION RESPONSE LETTER, SUBMITTAL # 5

PROJECT ADDRESS: 505 East Los Olivos Street
PLN RECORD #: PLN2024-00299
DATE: Thursday, July 3, 2025 – Review # 5
APPLICANT: Ben Eilenberg, THE MISSION LLC
socialindustrialequities@gmail.com
ASSIGNED PLANNER: Barbara Burkhart, BBurkhart@SantaBarbaraCA.gov
STATUS: COMPLETE

I. INTRODUCTION / PROJECT DESCRIPTION

The applicant submitted its Planning Application to the City for the subject project for review on July 22, 2024. Staff reviewed the application and sent a completeness review letter (#1), deeming the application incomplete, on August 20, 2024. The applicant resubmitted a revised Planning Application to the City in response to said letter on November 15, 2024. Staff reviewed the revised application and sent a completeness review letter (#2), deeming the revised application incomplete, on December 13, 2024¹. The applicant resubmitted another revised Planning Application to the City on December 18, 2024. Staff reviewed the revised application and sent a completeness review letter (#3), deeming the revised application incomplete, on January 15, 2025. The applicant resubmitted another revised Planning Application to the City on April 12, 2025. Staff reviewed the revised application and sent a completeness review letter (#4), deeming the revised application incomplete, on May 12, 2025. The applicant resubmitted a revised Planning Application to the City on June 6, 2025.

The proposed project has been revised to include a Lot Line Adjustment (LLA) between Parcels 1 and 2, as described in the Grand Deed submitted.

The project proposes to demolish all existing structures and the parking lot; construct a new 270-unit for-rent residential development, with 444 automobile and 255 bicycle subterranean

¹ The applicant sent the City questions regarding the Planning Application via email on September 6, 2024, and the City provided written responses on September 13, 2024. The applicant sent additional comments via email on September 23, 2024, and the City provided written responses to the applicant's attorney via its outside counsel on September 27, 2024. The December 13, 2024 completeness evaluation reflected the information shared with the applicant in the City's written responses provided on September 13 and 27, 2024; those responses were incorporated into the December 13, 2024 letter by reference.

parking spaces; new landscape, road, and hardscape surfaces; and new irrigation design. The project would include 54 low-income units.

The total building area is proposed at 468,816 square feet and includes lobbies, corridors, and mechanical spaces; a podium deck with a gym and swimming pool, among other amenities; common open spaces, and private yards and decks for some residential units. The proposal includes approximately 233,757 square feet of residential living space.

Approximately 40,208 cubic yards of cut and 10,573 cubic yards of fill are proposed.

The project site is zoned RS-15 (Residential Single unit, 15,000-square-foot minimum lot size) and has a General Plan land use designation of Low Density Residential (3 du/ acre).

The information reviewed by the LDT staff included:

- Response Letter uploaded June 6, 2025
- Title Report dated June 5, 2025
- Plan Set uploaded June 6, 2025
- A Conceptual Lot Line Adjustment Exhibit received by e-mail on June 23, 2025

As provided in Government Code Section 65943(a), the City has 30 days from the date a Planning Application is submitted for processing to determine if the application is “complete” (i.e., contains all of the required information necessary for project analysis and decision). During the 30-day application review period, the Planning Application is forwarded to various City land development departments and divisions for their review, comments, and completeness determination. The City is required to notify a project proponent within the 30-day application review period of its determination as to Planning Application completeness.

II. COMPLETENESS DETERMINATION

The purpose of this letter is to notify you that the Planning Application for the subject project has been deemed “complete,” and that further processing of the Planning Application can occur. Further processing includes environmental review of the proposed project, analysis for compliance with applicable plans, policies, ordinances, codes, etc., and action on the proposed project application by the appropriate decision-making body(ies).

The subsequent LLA application submittal has a balance due for the application fees. The application is otherwise complete and will be deemed as such once said fees are paid. This application will be incorporated into, and processed concurrently with, the original housing development application.

III. ADDITIONAL INFORMATION REQUIRED

The information requested below is necessary to adequately review the proposed development project.

Items in Section VII, Advisory Information are not required to complete your application, but are important to be aware of as they may be required at a future date or may impact staff's support of your project.

The items below in ~~strikethrough~~ text have been addressed through the resubmittal made on November 15, 2024. Items in ~~double strikethrough~~ text have been addressed through the resubmittal made on December 18, 2024. Items in ~~highlighted strikethrough~~ have been addressed through the resubmittal made on April 12, 2025. Items in ~~highlighted double strikethrough~~ text have been addressed through the resubmittal made June 6, 2025. Feedback on the November 15, 2024 submittal is shown in underline. Feedback on the December 18, 2024 submittal is shown in double underline. Feedback on the April 12, 2025 submittal is shown in heavy underline. Feedback on the June 6, 2025 submittal is shown in dotted underline.

A. **Planning Division**

Staff Contact: Barbara Burkhart, BBurkhart@SantaBarbaraCA.gov; (805) 560-7587.

~~● Plan Review.~~

~~● Project Plans.~~ Although we recognize that the applicant has invoked the “Builder’s Remedy” pursuant to Government code Section 65589.5(d)(5) in connection with this application, the City requires the following details to be adequately shown on the plans to satisfy the City’s application submittal requirements and evaluate the project’s consistency with applicable development standards.

~~● Grading Plan.~~ Because the proposed grading exceeds 500 cubic yards, a three-dimensional computer simulation or model presentation of the grading is required, unless waived by the Historic Landmarks Commission (HLC) at a Conceptual Review hearing (held prior to the application being deemed complete, at the request of the applicant).

~~● Title Sheet.~~ Provide a Title/ Cover Sheet that includes the following:

~~● Scope of Work~~

- ~~○ Describe the existing site development, all work proposed, and any phased or concurrent permits. Indicate any exceptions requested. Include the building height. Note if fire sprinkler or utility upgrades are required, including undergrounding.~~
- ~~○ Update the Project Description/ Scope to indicate that the project is proposing 20% of the units to lower income households as defined in the Government Code.~~

~~● Project Data.~~ Identify:

- ~~○ Lot Size in square feet and acres.~~
- ~~○ Average Slope of property.~~
- ~~○ Proposed Floor Area; identify both gross and net floor area, as defined in SBMC §30.15.070, for each floor of the building.~~

~~* Thank you for providing gross and net floor area for each floor of the building. Per your response letter, gross floor area was calculated to include all area of the floor/story inwards of the exterior perimeter of the building structure, and net floor area was calculated to exclude areas within that floor/story that do not have a floor assembly supporting the floor.~~

~~Please correct your net floor area calculations to provide the sum, in square feet, of the horizontal areas of all floors of the structure measured from either the interior perimeter of the exterior walls, or below the roofline, or the centerline of interior walls as described in SBMC §30.15.070.~~

~~Your response letter states that the net floor areas have been updated on Sheet G001; however, the information provided in the *Building Floor Area - Net & Gross by Floor Level* and the *Residential Net Floor Area by Unit / Floor Level* tables have not been updated since the previous submittal. Please revise to address this comment.~~

~~Your April 12, 2025, response letter states that the Residential Net Floor Area by Unit/ Floor Level tables are updated and correct, and points to Sheet G001.b; however, the data included in the Residential Net Floor Area by Unit/Floor Level (Sheet G001.b) does not include square footage information (it appears the associated columns have been cut off). Please provide the complete table, including square footage.~~

- ~~Identify square footage of Architectural Features: i.e. porches, landings, decks, patio covers, towers, gazebos.~~
- ~~Identify any Excluded Areas: i.e. vent shafts, lofts, crawlspace, attics, mechanical rooms.~~
 - ~~Your response letter states that excluded areas include vent shafts, attics, and mechanical rooms; however, the requirement is to provide this information on the plans in the Project Data to demonstrate the specific areas in the plans that are Excluded Areas. (Moved to Section VII, Advisory Information.)~~

- ~~Parking: identify both automobile and bicycle; include the number of spaces proposed along with the required ratio (refer to more detailed parking discussion below).~~

~~Thank you for identifying both automobile and bicycle parking spaces, and for including the number of spaces proposed along with the required ratio. Please correct the *Parking Calculations Table*, as follows:~~

~~● Proposed Parking:~~

- ~~1. Revise the automobile data for P1 to be 63 stalls, not 636 stalls.~~
- ~~2. The table states 255 long term bicycle parking spaces are proposed, while the *Project Description/Scope* states 336 bicycle parking spaces are proposed. Please reconcile.~~

~~● Required Parking Spaces Per SBMC (Chapter 30.175):~~

- ~~3. Revise to include all proposed residential units; only 225 units are accounted for in the table provided.~~

~~● Parking Data – City of Santa Barbara Requirements:~~

- ~~4. Revise to include all proposed residential units; only 225 units are accounted for in the table provided.~~
- ~~5. Revise to indicate that there are no studio units > 600 square foot proposed.~~

~~Please also note the following and correct as needed:~~

~~● There appear to be unnumbered parking spaces as follows:~~

- ~~○ Sheet A.P.04: The space between 18 and 19~~
- ~~○ Sheet A.P.03: The space between 1 and 111~~
- ~~○ Sheet A.P.02: The space between 1 and 111~~

~~If these are indeed parking spaces, then they need to be numbered.~~

~~● There are inconsistencies between the number of parking spaces indicated and the number shown as follows:~~

- ~~○ Sheet A.P.04:~~
 - ~~* Standard spaces: 35 indicated vs. 41 shown~~
- ~~○ Sheet A.P.03:~~
 - ~~* Standard spaces: 112 indicated vs. 117 shown~~
- ~~○ Sheet A.P.02:~~
 - ~~* Standard spaces: 112 indicated vs. 117 shown~~
 - ~~* Compact spaces: 42 indicated vs 41 shown~~
- ~~○ Sheet A.P.01:~~

- ~~• Standard spaces: 47 indicated vs. 42 shown~~

~~Please reconcile and coordinate with any unnumbered parking spaces per comment above.~~

~~• Housing Project Data:~~

- ~~○ Include residential density formula used for the project, which appears to be 89 units per acre (255 units/ 2.86 acres).~~
- ~~○ Indicate whether units would be for rent or sale (condominium).~~

~~○ Site Plan:~~

- ~~○ Show the project's relationship to front and interior setback requirements of the RS-15 zone. Be aware that front setbacks are measured from the back of the street dedication (refer to Transportation comments below).~~

- ~~• Front: 30 feet~~

- ~~• Interior: 10 feet~~

- ~~○ Show any common open yard area(s) proposed at ground level. Thank you for showing the private open yards proposed at ground level. Please also show any common open yard, or indicate that there is none proposed.~~

- ~~○ Label all units by type (studio, 1 bedroom, etc.).~~

- ~~• One one bedroom unit on the eighth floor is not labeled. Please label accordingly.~~

- Label all bedrooms in all units.**

- ~~○ Label the use of all areas that are not residential units (decks, circulation, trash & recycling, etc.).~~

- ~~○ Show the minimum building connection standards on the appropriate floor and/ or roof plans. Enclosed buildings are considered "attached" when the buildings share a minimum of 8 feet x 8 feet of common building wall connection.~~

○ Elevation Drawings.

- ~~○ Provide elevation drawings that are developed beyond the "schematic" phase; please ensure that they correspond correctly to the floor plans in all respects. It does not appear that the floor plans and elevation drawings are consistent.~~

- ~~• Per the Project Plan Submittal Guide, Elevation drawings are needed for each building face related to the scope of work. Please provide an elevation for each face of the building, including those that are interior to the overall structure. (Moved to Section VII, Advisory Information.)~~

- ~~• Per the Project Plan Submittal Guide, the type of building materials on wall surfaces, roofs, and for windows and doors must be indicated on the Elevation drawings.~~

~~including High Fire Area building materials. Thank you for providing material specifications on Sheets A.5.01 through A.5.04; however, they must be called out on the elevation drawings as well.~~

- ~~• Per the Project Plan Submittal Guide, Elevation drawings must show the existing and proposed grade planes and heights of all buildings. (Moved to Section VII. Advisory Information.)~~

- Per the Project Plan Submittal Guide, Elevation drawings must also show the following:

1. Base Flood Elevation, Design Flood Elevation, Base Elevation Point (solar);
2. Solar Access height limit, and maximum height per the zoning district;
3. ~~Property lines and setbacks for portions of the building that encroach into setbacks;~~
4. ~~Width and vertical clearance of garage doors, exterior landings, and height of planter walls. (Moved to Section VII, Advisory Information.)~~

- ~~○ Remove all background and landscape imagery. (You may provide supplemental renderings.)~~

- ~~○ Label the maximum height to the top of all ridges and/ or parapets of the structures (refer to more detailed height discussion below).~~

- ~~○ Identify the Based Flood Elevation and the Design Flood Elevation.~~

- Residential Unit Standards. Provide the proposed net floor area for each unit.

- ~~○ Thank you for providing revisions to the Unit Type – Total Per Floor and the Residential Net Floor Area by Unit/ Floor Level tables; however, the net square footage for each unit is not provided. Please provide.~~

- ~~○ Note: Per SBMC §[30.140.150](#), each studio must be a minimum of 220 square feet and all other residential units must contain a minimum of 400 square feet.~~

- ~~○ Material Specifications. Include large scale drawings of significant architectural elements, such as handrails, guardrails, arches, columns, window and door details, etc., as noted on the [Project Plan Submittal](#) handout. (Moved to Section VII, Advisory Information.)~~

- ~~○ Outdoor Lighting Plan. If outdoor lighting is proposed, information sufficient to demonstrate compliance with SBMC Chapter 22.75, and the requirements of the [Outdoor Lighting and Streetlighting Design Guidelines](#) is required; including plan and elevation drawings, lamp type, and wattage.~~

- ~~○ Landscape Plans.~~

~~Common Open Yard: 15% of the lot area as open yard, with minimum 10-foot by 10-foot dimensions~~

~~Private Open Yard:~~

~~i. Private Open Yard Located on the First Story:~~

~~(1) Minimum Area:~~

~~(a) Studio unit: 100 square foot~~

~~(b) 1 Bedroom unit: 120 square foot~~

~~(c) 2 Bedroom unit: 140 square foot~~

~~(d) 3 or more Bedroom unit: 160 square foot~~

~~(2) Minimum Dimensions: 10 feet long and 10 feet wide.~~

ii. Private Open Yard Located on a Second or Higher Story:

Please note that the following private open yard requirements apply to each and every story above the first story.

(1) Minimum Area:

(a) Studio unit: 60 square feet

(b) 1 Bedroom unit: 72 square feet

(c) 2 Bedroom unit: 84 square feet

(d) 3 or more Bedroom unit: 96 square feet

(2) Minimum Dimensions: Six feet long and six feet wide.

● **Encroachments**

Show the project's relationship to the maximum allowed encroachment and minimum distance to the property line on the plans (SBMC §[30.140.090](#)). Call out all roof overhangs, pop-outs, projections, or other architectural features, decks, and porches on the site plans, floor plans, and elevations.

● **Fences and Hedges**

- Label the height, location (beginning and end), and materials of any proposed fences and/ or hedges on the site plan.
- This item has been moved to Section VII, Advisory Information.

~~Show the Site Visibility Triangle per SBMC §[30.140.230](#), Visibility at Driveways and Intersections. Your response letter indicates that this information is provided on the Civil Sheets, however it is not provided on any sheet in the plan set. See below for further clarification on how to depict this on the plans.~~

~~• SBMC §[30.140.230.B Driveways](#). Visibility at a driveway that crosses a front property line shall not be blocked above a height of 42 inches within the triangle areas described below.~~

~~1. Street with Sidewalk and Parkway. When a driveway directly abuts a portion of a street with a sidewalk and parkway, the triangle is measured on two sides by a distance of 10 feet from the side of a driveway and 10 feet back from the front lot line.~~

~~2. Street without Sidewalk and Parkway. When a driveway directly abuts a portion of a street without a sidewalk and parkway, the minimum required site distance is established based on legal vehicle speed and the position of the driver's eye in relation to the intersection as determined by the Public Works Director. The Public Works Director may require additional site distance due to site specific conditions.~~

• **Building Height** (the following comments were moved to Section VII, Advisory Information)

Identify building height on each elevation drawing and on any sections provided. Building height is measured from every point on top of the building roof or roof parapet to a warped plane directly below connecting all points where existing or finished grade, whichever is lower, contacts the exterior building walls or foundation system. See SBMC §30.15.090.A for additional information. Building heights are not dimensioned on Sheet A.2.02. Building heights on Sheet A.2.03 are not dimensioned for the elevation labeled, "Wing 2 – South Elevation," and are shown incorrectly on the right side of the elevation labeled, "Wing 2 – West Elevation." Please revise. Although building height was identified on the elevations, it was not shown correctly.

See below for further clarification on how to depict this on the plans.

* **SBMC §30.15.090.A. Measuring Building Height.** Building height is measured from every point on top of the building roof or roof parapet to a warped plane directly below connecting all points where existing or finished grade, whichever is lower, contacts the exterior building walls or foundation system.

i. Indicate the location of the 30-foot maximum building height for the RS-15 zone on both elevations shown on Sheet A.2.02.

- o Show the 30-foot maximum building height per SBMC §30.15.090.A. Building height is measured from every point on top of the building roof or roof parapet to a warped plane directly below connecting all points where existing or finished grade, whichever is lower, contacts the exterior building walls or foundation system. Plans incorrectly indicate 30 feet from the finished floor of the first floor.

Show the project's relationship to solar access height standards for all northerly lot lines. The maximum height of each point on a structure, measured from the Base Elevation Point, shall not exceed the sum of 12 feet and 58% of the shortest distance from the structure to the

~~nearest northerly lot line as measured horizontally on the plan view of the structure. See SBMC §30.140.170 and the City's [Solar Access Handout](#) for more information. In your Response Letter you stated that solar access height compliance is not applicable to this project due to the unique site topography. Site topography may alter how the Base Elevation Point is measured; however, there is nothing in the code that would exempt a project from identifying solar access height requirements based on site topography.~~

~~Thank you for providing information on solar access height standards; however, some of the northerly lot lines are given incorrectly. See the image below for the correct northerly lot lines; please revise the plans accordingly.~~

● ~~Mechanical Equipment Noise~~

~~i. Provide the following information for proposed mechanical equipment:~~

~~● Provide manufacturer's specifications for the proposed equipment that show the maximum sound output in dB(A).~~

~~● On the site plan, provide a dimension from the proposed equipment to the property line for westerly Roof R7, northerly Roof R8, easterly Green Roof R6, and northerly Green Roof R7.~~

~~○ Your response letter states, "See Roof plan for general locations of mechanical equipment," however no roof plan has been submitted for the eighth level. Please provide.~~

~~● Thank you for providing the cumulative sound/noise decibel calculations at the north and west elevation property lines. Please also provide the cumulative sound/noise decibel calculation for the south elevation property line. Revise the decibel calculation on the site plan to show the cumulative sound/noise of all proposed equipment at the East Elevation property line adjacent to parcels used or zoned for residential, public, or semi-public uses. Use the link to the online calculator below to determine the amount of attenuation, in decibels, you can expect with a change in receiver distance (i.e. the reduction in decibels from the proposed equipment to the property line): <http://www.mcsquared.com/dbframe.htm>. Show the decibel calculation on the site plan.~~

~~Please note that the noise limitation for mechanical equipment is 53 dB(A) at the property line of any adjacent parcel used or zoned for residential, public, or semi-public uses.~~

● ~~Tenant Displacement.~~

~~Pursuant to the Housing Crisis Act (SB-330), a new housing project must create at least as many residential dwelling units as existed on the project site within the last five years. Additionally, the project must replace any dwelling units occupied by lower or very-low income households with units made available at affordable~~

rent or affordable housing cost to low-income persons. The City also has its own tenant displacement assistance requirements.

If this project will result in the demolition or reduction of rental units, submit the relevant forms from the [Tenant Displacement Assistance](#) handout. If the income category of the last household in occupancy is not known, it shall be presumed that lower income renter households occupied these units in the same proportion of lower income renter households to all renter households within the City.

- ~~● **Photographs.** Provide additional photos. Submit current color photographs of the site from the street, each elevation of the buildings, adjacent properties, surrounding neighborhood area, and streetscape.~~

- ~~● Thank you for including photo shoots with your resubmittal; however, they do not include the requested views. Please submit current color photographs of the site from the street, each elevation of the buildings, adjacent properties, surrounding neighborhood area, and streetscape.~~

- ~~● Re: Sheet G003, Google Images are not acceptable as they may not reflect current conditions. Please revise to include current photographs. (The overhead Google image can be included for reference points.)~~

- **Landscape Plans.** New buildings and substantial alterations to existing landscaped areas require a landscape plan before Final Approval. Review the Landscape Plan Submittal Guide for the required contents of a landscape plan. Landscape plans must comply with Landscape Design Standards for Water Conservation, SBMC Chapter 22.80. Properties in the High Fire Hazard Area must comply with defensible space requirements for landscaping.
- **Color Board & Details.** Complete working/construction drawings and a color board are required prior to Final Approval. Include the Final Approval Submittal Checklist.
- **Fees.** The project requires additional fees, for the proposed LLA. Refer to Section VI below.

B. Building & Safety Division

Staff Contact: Chris Short, CShort@SantaBarbaraCA.gov; 805-897-2528

- ~~1. Provide a Base Flood Elevation Assessment prepared by a certified California surveyor. (Moved to Section VII, Advisory Information)~~
- ~~2. Revise plans to show the Base Flood Elevation (BFE) and Design Flood Elevation (DFE), as defined by the above assessment. (Moved to Section VII, Advisory Information)~~

C. Engineering Division

Staff Contact: Michael Cloonan, MCloonan@SantaBarbaraCA.gov; (805) 564-5365

- ~~1. **Utility Service Plan.** Please show existing and proposed water and sewer service connections.~~
- ~~2. **Preliminary Title Report** Please provide a preliminary title report at next submittal for review and comment. Thank you for providing a Title Report; however, as~~

~~specified on page 3 of the Planning Application checklist, a preliminary title report, issued within three months of the application, must be submitted for all parcels. The Property Title Report provided appears to be a Property Report, not a Title Report, and is not sufficient to satisfy this requirement.~~

D. **Wastewater**

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

- ~~1. Please provide comprehensive Utility Plans, Plumbing Plans, and Civil Sheets. 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. (Moved to Section VII, Advisory Information)~~
2. For the City to evaluate potential downstream impacts on the collection system and wastewater treatment plant, please provide fixture calculations, including the estimated wastewater flow (in gallons per minute) that will be discharged from the proposed project to the sewer main. (Moved to Section VII, Advisory Information)

E. **Water Supply/Distribution**

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

- ~~1. Please provide comprehensive Utility Plans, Plumbing Plans, and Civil Sheets. Your response letter indicates this information is provided on Sheet C-2 (Grading and Drainage Plan); however, this is not the case; please show all proposed connections to the City's water system, their locations, and sizes. C-2 Civil Sheet only shows "Protect Existing 2" Water Connection in Place". A 2" water service connection is not adequate to serve the proposed number of units. Please show all proposed new (N) connections to the City's water system, their locations, sizes, and purpose served. Please show all existing (E) water service connections to the City's water system, their locations, sizes, and intentions or abandonments. <mailto:JBecker@santabarbaraca.gov> (Moved to Section VII, Advisory Information)~~

F. **Transportation Division**

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

- ~~1. Dimension Right of Way and Public Improvements per SBMC Ch. 22.44 on Civil, Landscape and Architectural Plan Sheets along E. Los Olivos and Mission Canyon Road Property Frontage. Please provide survey from a Licensed Surveyor with boundary information and clearly delineate existing right of way. The right of way varies along Mission Canyon adjacent to the property. The entire right of way width shall be called out in Sheet V-01. A portion of the driveway to the~~

~~subject property is not a part of the subject property. An access easement may need to be provided from APN 023-140-022.~~ (Moved to Section VII, *Advisory Information*)

The project's sidewalk corridor width shall be a minimum of 12 feet including:

- ~~6-inch curb,~~
- ~~4 feet of furnishing zone,~~
- ~~6 feet of through pedestrian zone, and~~
- ~~1.5 feet of frontage zone.~~

The frontage zone may be located on the lot adjacent to the right of way. The Phase II HSSR will need to analyze the public improvements. Due to the sandstone walls, remnants of the California Aqueduct, and mature trees, the sidewalk corridor may need to be relocated behind the sandstone wall from the existing second driveway to the north property line. Sidewalk shall continue to the north property line, which means a pedestrian/bicycle bridge will need to be constructed adjacent to the vehicle Mission Canyon Bridge. The street cannot be narrowed to accommodate the sidewalk corridor. Note that zoning setbacks are measured from the back of any required dedication. (Moved to Section VII, *Advisory Information*)

2. ~~**Street Lighting.** Per SBMC §22.44.010.E, new or altered street lighting, in accordance with Public Works Construction Standard Details, is a required improvement for lots that are located at a corner of two or more intersecting public streets, or lots having 50% or more of the frontage of a block, or lots having at least 100 feet of street frontage. Please show required street lighting on the site plan. Coordination with PW Engineering will be required for street lighting.~~
3. ~~**Parking Data.** Revise the parking data table to include the number of existing, required by code, and proposed covered/uncovered parking stalls and bicycle parking stalls for each unit.~~
4. ~~**City's Access and Parking Standards.** Provide the following on the plans:
 - a. ~~**Labelling.** Number the proposed parking stalls.~~
 - b. ~~**Minimum Stall Dimensions.** Dimension the proposed stall lengths and stall widths of the proposed uncovered parking stalls. Standard parking stalls require a minimum of 8'-6" x 17'-6" per stall. Wider stalls may be required when parking bay widths are narrower than standard or vertical elements are adjacent to stalls. (Moved to Section VII, *Advisory Information*)~~
 - c. ~~**Minimum Bay Dimensions.** Figures 2 & 3 of the City's Access and Parking Standards provide minimum dimensions for 90-degree and angled parking for single loaded bays and double loaded bays. Parking stall angles less than 45 degrees are not permitted. Parking stall angles greater than 75 degrees and less than 90 degrees are also not permitted to minimize instances of automobiles exiting the wrong way. Parking lots with angled parking configuration shall be designed for one-way circulation. (Moved to Section VII, *Advisory Information*)~~
 - d. ~~**Compact Stalls.** In parking lots containing more than ten spaces, a maximum of 30% of all required automobile parking may be for compact cars. The minimum~~~~

~~compact stall width is 8'. The compact spaces shall be distributed throughout the parking lot, rather than concentrated in one area to maximize access and usability. Dimension and identify the compact parking stalls. (Moved to Section VII, Advisory Information)~~

- e. ~~**Maneuvering.** The minimum maneuvering depth for an 8' 6" x 17' 6" standard parking stall is 23' 0". Dimension the required minimum maneuvering depth for each uncovered parking stall on the proposed site plan. (Refer to Figure 2 in the City's Access and Parking Design Standards). All turnaround movements shall be accomplished in one maneuver; one maneuver is one back up and one forward movement.~~
- f. ~~**ADA Stalls.** Dimension the proposed ADA stalls and clarify if charging equipment is proposed. If charging equipment is proposed, revise the plans to note the location of the proposed charging equipment and demonstrate it does not encroach into the required parking stall dimensions. Additionally, provide specifications of the proposed charging equipment. Consult with Building & Safety regarding accessible parking stall requirements.~~
- g. ~~**Location of Electric Vehicle (EV) Equipment.** Please provide locations of EV equipment and demonstrate on plans that they do not conflict with the minimum stall dimensions. Additionally, provide specifications of the proposed EV charger equipment for staff to review. (Moved to Section VII, Advisory Information)~~
- h. ~~**Vertical Elements.** If there is a vertical element in excess of 6" in height (e.g. walls) adjacent to a parking stall, an additional 1' of stall width is required to provide clearance. Update the plans to dimension the stall widths between each vertical element and include an additional 1' 0" stall width for each stall adjacent to a vertical element (e.g. Structural post, walls, etc.). If there is a vertical element in excess of 6" in height (e.g. walls) adjacent to a parking stall, an additional 1' of stall width is required to provide clearance.~~

~~Thank you for providing the widths of groupings of stalls. However, what's required is to dimension the widths of all stalls adjacent to vertical elements such as structural posts and walls. Please note the parking layout does not have 1' buffers from the structural posts. Because of this, the maneuvering does not work. See Section VII.F.8., of this letter, under *Advisory Information*, for the parking spaces with issues. (Moved to Section VII, Advisory Information.)~~

- ~~**On Site Loading.** Please show auto-turn with a delivery vehicle (WB40) in the onsite loading area. (Moved to Section VII, Advisory Information). On-site loading is demonstrated on Sheet A.0.01 (Page 25). That said, the on-site loading requirement comment will be moved to the Advisory Section. A redesign is anticipated as the Advisory comments have not been addressed, and technical reports/environmental studies have not been completed. The project will need to continue to demonstrate compliance with on-site loading on every plan submittal moving forward.~~
- i. ~~**Sight Visibility at Driveways.** Your response letter states that this is provided on the Civil sheets, however it is not. Please show sight visibility and the visibility triangle on the site plan including the required sidewalk improvements (i.e. street~~

~~with sidewalk and parkway visibility diagram). Demonstrate compliance with sight visibility at driveways and intersections per §30.140.230. Add a note that "no fence, screen, wall, hedge or other landscaping material exceeding a height of 3' 6" shall be located within the visibility triangle. Refer to SBMC §30.140.230 for additional information and visibility triangle diagram, and the Fences and Hedges comment above in Section III.A. of this letter. (Comment moved to Section VII, Advisory Information.)~~

- ~~j. **Driveway Width.** A two-way driveway is required with a minimum paving surface of 22 feet. Please dimension driveway. (Moved to Section VII, Advisory Information)~~
- ~~k. **Driveway Aprons.** Confirm in a detail that the sidewalk is carried through at the same grade as the sidewalk across the driveway apron. (Comment moved to Section VII, Advisory Information.)~~
- ~~l. **Gates.** All driveway gates and arc of the gate swing shall be setback a minimum of 20 feet from the front lot line to minimize sidewalk blockage and interference with traffic flow. Provide dimensions to show how the project complies with these requirements on the site plan.~~
- m. **Vehicle Ramps.** Provide the following information:
 - ~~i. For multiple unit dwellings or non-residential uses, all parking plans involving ramps shall be accompanied by a profile showing the ramp, ramp transitions and overhead and adjacent wall clearances.~~
 - ~~ii. Identify ramp length. The length of a ramp is defined as that portion of the ramp from the beginning of the transition at one end of the ramp to the end of the transition at the opposite end thereof.
 - ~~• For ramps longer than 65', the ramp grade shall not exceed 12% with the first and last 8' of the ramp not exceeding 6%.~~
 - ~~• For ramps 65' in length or less, the ramp grade shall not exceed 16% with the first and last 10' of the ramp not exceeding 8%.~~
 - ~~• While plans call out the ramp slope, please provide a cross-section. See Figure 1 below.~~~~
 - ~~iii. Identify slopes of parking areas. The slopes of all parking areas shall not exceed 5%, excluding ramps.~~
- **Identify any ADA accessible routes. When an ADA accessible route across a vehicle ramp is required the maximum slope is regulated by the California Building Code. Please consult Building & Safety.** (Moved to Section VII, Advisory Information) The vehicle ramp slopes have been provided on Sheet A.P.02-04 (Page 25-27). That said, all requirements related to vehicle ramp requirement comment have been moved to the Advisory Section. A redesign is anticipated as the Advisory comments have not been addressed, and technical reports/environmental studies have not been completed. The project will need to continue to demonstrate compliance with on-site loading on every plan submittal moving forward.

- ~~n. Thank you for providing the vertical curve in the parking garage. Please also show this at the main driveway into the property. Show driveway slopes and identify length of vertical curve. Minimum vertical curve lengths provide for gradual transitions between a street/sidewalk and driveway and between a driveway and parking area.~~
- ~~i. If the slope of the driveway is 0 - 10%, a 5' minimum length vertical curve is required.~~
 - ~~ii. If the slope of the driveway is 10 - 16%, a 10' minimum length vertical curve is required.~~
- ~~o. When the slope of a driveway is rising to meet the sidewalk or garage level, 5' of the driveway shall be the same slope as the sidewalk or garage level. (Comment moved to Section VII, Advisory Information to provide section and plan detail.)~~
- ~~p. **Bicycle Parking Plan.** The project requires a minimum of one long-term bicycle parking stall per residential unit.~~
- ~~i. Provide a bicycle parking plan that includes bicycle parking locations, long-term designation, parking rack/device type (manufacturer's spec sheet), bicycle parking layout with dimensions, and enclosure details. a. Dimensions. Each standard surface bicycle parking space shall be a minimum of 2' x 6'. Show the minimum surface dimensions at each of the proposed bicycle parking locations.~~
 - ~~ii. Minimize Obstructions. A minimum of 3' must be provided between each side of a bicycle rack and a vertical obstruction, such as a wall. When designing a bicycle parking facility, consider providing access from multiple sides to ensure all parking spaces can be used.~~
 - ~~iii. Maneuvering. A minimum 5' aisle or space shall be provided for bicycles to enter and leave the facility. In an enclosed space where bicycles are parked perpendicular to a wall, the aisle shall have a width of at least 7' to the front or rear of a bicycle parked in the facility. Maneuvering space should allow for simultaneous users, provide for entry and exit of the facility and accommodate rack operations and lifting of bicycles where necessary.~~
 - ~~iv. Include a manufacturer's specification sheet of the proposed bicycle rack on the plans.~~
 - ~~v. Refer to Section 13 (pages 17-21) of the City's Access and Parking Design Standards for bicycle parking requirements. (Moved to Section VII, Advisory Information)~~
- ~~q. Pedestrian Circulation and Access. Show any proposed paths between the sidewalk and residential buildings. Paths are recommended so residents do not have conflicts with vehicles along the driveway. Refer to page 4 of the City's Access and Parking Standards for details.~~
- ~~r. **Printed Plans.** Once the plans have been updated to address all corrections, deliver a full size printed plan of the proposed site plan (single sheet, print to standard scale) for Transportation staff review of the proposed parking design.~~

~~Deliver to the lobby during counter hours, or to the drop off box in the hallway next to the David Cobhard room. Contact me directly when you have delivered the plans. (Moved to Section VII, Advisory Information.)~~

G. Fire Department

Staff Contact: Zach Wuchner, ZWuchner@SantaBarbaraCA.gov; (805) 564-5702

- ~~1. **Water Supply:** SBMC Chapter 8.04, Section 507.3 #2 and Section 507.5.1 A COMMERCIAL type fire hydrant is required for this project. The hydrant must be located within 300 feet of all exterior walls by way of access. It must be provided with one (1) four inch (4") and two (2) two and one half (2 ½") outlets and must have a fire flow in excess of 1250 gallons per minute. Please show location of nearest fire hydrant on plans. Include hydrant number, number and size of outlets and latest recorded GPM flow. While the location of the new fire hydrant on sheet C-2 may be within our distance requirement, it's location will need to be approved by the Water Department as the hydrant will be located on private property. (Moved to Section VII, Advisory Information.)~~

H. Environmental Services Division

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

All comments below were moved to Section VII, *Advisory Information*.

~~1. Capacity.~~

- ~~a. Project requires containers for: Trash, Recycle, and Greenwaste.~~
- ~~b. Show all proposed containers to scale on the site plan and indicate the size and waste stream of each (e.g. Trash 4 cubic yard dumpster, recycle 4 cubic yard dumpster, 95-gallon greenwaste cart).~~
- ~~c. Waste generation can be calculated using the total number of bedrooms. Contact DRosales@SantaBarbaraCA.gov for assistance calculating the number of dumpsters needed onsite.~~

~~2. Access.~~

- ~~a. Indicate the path of travel of the containers from the enclosure to the location where they will be serviced by the waste hauler. The enclosure should be located no more than 50' from the truck access point where the truck lifts the dumpsters.~~
- ~~b. Path of travel cannot exceed 2% grade for dumpsters and must be smooth pavers, i.e. concrete. This can be shown on the site plan as a simple dashed line. Path of travel cannot include stairs of any kind.~~
- ~~c. The waste hauler will not be able to empty dumpsters in parking garages unless ceiling height exceeds 20'.~~
- ~~d. Show all pedestrian gates and hauler access gates in the open position. For swing gates, show open at 120 degrees. For sliding gates, show in the open position.~~
- ~~e. Gate openings must be sized for the largest dumpster in the enclosure. The minimum gate opening for a 4 cubic yard dumpster is 105".~~

- f. ~~For indoor locations where there will be food in the trash or Foodscraps bins, the trash/recycling area requires these additional features for sanitation:~~
 - i. ~~Walls and floor constructed with a smooth finish that can be easily cleaned~~
 - ii. ~~Mechanical ventilation, or with screened vent openings to the outdoors~~
 - iii. ~~Floor drain with proper drainage slope that connected to the sanitary sewer~~
 - iv. ~~Spigot with hose for cleaning~~

3. ~~**Trash Chutes.** Indicate if trash chutes are proposed. Trash Chutes are highly discouraged because they can lead to operational issues. If trash chutes are proposed, residential will need two separate chutes for trash and recycle. A greenwaste container can be made available on the ground floor for residents. Please indicate the path of travel from residential tenant spaces to the ground floor trash room for access to greenwaste and disposal of bulky items that do not fit in a trash chute. For trash chute approval you will need to provide the following:~~

- a. ~~Cross section building diagram showing trash chutes vertically for all levels.~~
- b. ~~Floor plan for ground floor enclosure. Show footprint of chute output. Ensure chute output is over the correct container type for trash or recycle.~~
- c. ~~Ensure vertical clearance for the height of the dumpster under each chute input.~~
- d. ~~Floor plan for the trash chute room that tenants will interact with. Need two separate chutes for trash and recycle. Need signage for each chute displaying which chute is for which stream.~~

I. **Creeks Division**

Watercourse

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

- 1. ~~Please identify on the site plans the top of the bank of Mission Creek as defined in SBMC §§ 30.140.050 and 30.15.040. It appears that sections of the bank are steeper than 1.5:1. Please provide the necessary cross sections to depict the angle of repose and calculated top of bank. (Moved to Section VII, Advisory Information)~~
- 2. ~~All development must be a minimum of 25 feet from the top of the bank of Mission Creek in accordance with SBMC § 30.140.050. It appears that the proposed development (i.e. foundation, retaining walls, buildings new patios, and other building improvements) would be located within 25 feet of the top of the bank of Mission Creek.~~
 - a. ~~If development is proposed within the 25-foot development limitation area, approval from the Community Development Director will be required per SBMC §30.140.050.E, and must be found consistent with the Development Standards in subsection E per the Procedures in subsection G. (Moved to Section VII, Advisory Information)~~
- 3. ~~Please depict a 25-foot and 50-foot setback from the appropriate top of bank on your site plan. (Moved to Section VII, Advisory Information)~~

IV. REQUIRED APPLICATIONS

A. Planning Applications Received

You have applied for a “Builder’s Remedy” housing development project, pursuant to the Housing Accountability Act and SB-330, which requires the following discretionary approval:

1. Design Review by the Historic Landmarks Commission (SBMC Chapter 30.220 and Section 817 of the City Charter).

The application Response Letter asserts that, “This is a Builder’s Remedy project and therefore the Housing Accountability Act (state law) overrules the local regulations making this issue moot. There are no discretionary approvals such as review by the Historic Landmarks Commission or the items listed in this section (Section IV).”

The City disagrees with this position. To the extent that Gov. Code Section 65589.5(d) applies, it limits the basis to deny a project or to adopt conditions that make a project infeasible. Although Gov. Code Section 65589.5(d) limits the City’s discretion, it does not make project review nondiscretionary. To the contrary, Government Code section 65589.5(f)(1) expressly preserves the City’s ability to enforce objective development standards consistent with the regional housing need allocation and the density allowed and proposed on the site notwithstanding the provisions of section 65589.5(d)(5). In addition, Government Code section 65589.5(e) provides that the City must comply with the California Environmental Quality Act before approving a project, notwithstanding the provisions of section 65589.5(d)(5).

B. Additional Planning Applications Required

Based on the information that you submitted, the following applications are required *prior* to being deemed complete.

1. **General Plan and Zoning Map Amendments.** ~~The Project is inconsistent with the City’s General Plan Land Use Designation and Zoning designation. Although the applicant has invoked the “Builder’s Remedy” pursuant to Government Code Section 65589.5(d)(5) in connection with this application, note that the City has not yet determined if the Project is eligible for this provision. Moreover, if the City were to approve the Project as proposed, it would immediately result in a nonconforming use. In such situations, the California Department of Housing and Community Development has advised that a local government may require a General Plan Amendment and a Zone change in connection with an application seeking approval under Builder’s Remedy². Accordingly, you must include a proposed General Plan Amendment (SBMC Ch. 30.235) and a Zone change (SBMC Ch. 30.235) that are compatible with the project as part of your application before the application will be found complete.~~

² See March 28, 2024 Letter re 1601 W. El Segundo Blvd, Compton – Letter of Technical Assistance from Shannan West to Robert Delgadillo, City of Compton (https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/HAU/compton_hau604_ta_03282024.pdf)

The City agrees to waive any requirement to submit a General Plan or zoning amendment for purposes of evaluating whether the Application is complete pursuant to Government Code section 65943, given the California Department of Housing and Community Development's most recent evaluation of General Plan or zoning amendment requests in other jurisdictions. Although no General Plan or zoning amendment request will be required for the City to find the Application complete, this does not preclude the City from determining that a General Plan or zoning amendment may be required for final approval of the Project, nor does this reflect a determination on the question of what entitlements will be required for, and what standards will apply to, final approval of the Project.

2. **Mission Creek Development.** Community Development Director approval is required if the project proposes development within the Mission Creek Development Limitation Area (SBMC §30.140.050).

- a. Based on current information provided, it is the City's understanding that development on the Project site falls within the Mission Creek Development Limitation Area. If you have information that demonstrates that this is not the case, please provide it for City review. Otherwise, please note that the Project will be evaluated for compliance with the limitations of SBMC section 30.140.050.

3. Lot Line Adjustment. Review by the Staff Hearing Officer for a Lot Line Adjustment pursuant to SBMC Chapter 27.40 is requested.

C. **Additional Applications Required Prior to Planning Approval**

Based on the information that you submitted, the following applications are required prior to obtaining Planning approvals:

~~1. **Building & Safety Division**~~

- ~~a. Base Flood Elevation Assessment~~

~~2. **Parks and Recreation Department**~~

- ~~a. Tree Removal Permit (if applicable)~~

D. **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. **Building & Safety Division**

- a. Building Permit

2. **Engineering Division**

- a. Public Improvement Plan (C-1)
- b. Public Works Construction Permit
- c. **Certificate of Voluntary Lot Merger**
- d. Declaration of Lot Line Adjustment

3. **Wastewater**

- a. Application for New Sewer Service Connection available at <https://www.santabarbaraca.gov/waterapp>
- b. Sewer Lateral Inspection Program (SLIP) video uploaded to . Inspection must be completed by a plumber on the Certified List located at www.SantaBarbaraCA.gov/SLIPplumber

4. **Water Supply/Distribution**

- a. Application for New Water Service Connection available at <https://www.santabarbaraca.gov/waterapp>

5. **Transportation Division**

- a. Waiver

6. **Housing and Human Service**

- a. Affordable Housing Plan Supplemental application
https://santabarbaraca.gov/sites/default/files/2024-02/Affordable_Housing_Final%201-8-2024%20fillable.pdf

7. **Fire Department**

- a. Fire Sprinkler Permit

V. ENVIRONMENTAL REVIEW

Now that the formal planning application has been deemed complete, staff will begin formal environmental review of the subject project.

VI. FEES

Please be informed that fees are subject to change at a minimum annually (typically on September 1). Additionally, any fees required following project approval will be assessed during the Building or Public Works Plan Check phase and shall be paid prior to issuance of the building or other permit. Based on the information submitted, the subject project requires the following additional fees for the following reasons:

A. Planning Division

Fees required prior to Application Completeness:

Lot Line Adjustment, Minor (2 lots)	\$9,954.00
Records Management (7% of Planning and Building)	\$696.78
Cashier Services	\$15.00

Environmental Review (fees required after being deemed complete):

Environmental Review – Special Study Review (Per Study)	\$670.00
Environmental Review – Archaeological Resource Report, Phase I	\$582.00
Environmental Review – Historic Structures/ Sites Report, Phase I	\$582.00

(Mitigated) Negative Declaration (if applicable)..... \$4,950.00³

Environmental Impact Report (if applicable) \$TBD⁴

Fees required prior to Planning Approval:

General Plan Amendment \$15,000.00⁵

Zoning Map/Ordinance Amendment \$15,000.00⁵

Public Notice Mailing List Service (per noticed meeting)..... \$199.00

Following project approval:

Plan Check Fee \$1,905.00

B. Building & Safety Division

Following project approval:

Plan Check Fee TBD

C. Engineering Division

Following project approval:

Public Improvement Plan Check Fee..... % of Engineer's Estimate

Public Improvement Inspection Fee..... % of Engineer's Estimate

Subdivision Map Act (Lot Line Adjustment) Document Fee \$3,509.00

D. Water Supply/Distribution

Following project approval:

Backflow Plan Review: \$58.00

Water and Sewer Capacity Charge Estimate* TBD

*Depending on fixture count and meter sizing

Pre-Work Order Inspection \$150.00

Work Order Fees – depending on services and service sizes requested TBD

Fire Line Inspection \$644.00

E. Transportation Division

Following project approval:

Plan Check Fee..... \$669.00

Waiver Fee..... TBD

Traffic Generation Analysis \$669.00

³ If prepared by staff. Additional costs if consultant is required (as determined by staff).

⁴ Requires contract with outside consultant. \$8,000 initial cash deposit with actual contract costs plus staff time charged at the fully allocated hourly rates of all personnel involved.

⁵ Initial Deposit with actual costs charged at the fully allocated hourly rates of all personnel involved, plus any outside costs.

VMT Analysis.....	City Transportation Consultant to Provide Cost
Staff Contract Management.....	\$1,000.00
Traffic AMP Benchmark Update- per MFR Unit (\$46 per unit)	\$11,730.00

F. **Fire Department**

Following project approval:

Plan Check Fee	TBD
Permit Fee.....	TBD

Other Fees:

- Records Management - 7% of Planning and Building fees.
- Cashier Services - \$15 per transaction, not charged against fee transactions of less than \$200. Cashier Services Fee is charged against Planning, Building, Public Works, and all other land development fees.
- Convenience Fee - All payments for Community Development permits and fees made with a credit card through the online platform will be charged a convenience fee of 2.65% of the total amounts charged on the credit card as payment of services and permits.

VII. 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: Barbara Burkhardt, BBurkhardt@SantaBarbaraCA.gov; (805) 560-7587

- **Lot Line Adjustment (LLA).** The Scope of Work has been revised to include an LLA as of this submittal. Provide the following:
 - Total area, in acreage and square feet, of each existing lot and the proposed adjusted lots.
 - Location and dimensions of existing and proposed property lines.
 - Average slope of the existing and proposed lots.
 - Length of public street frontage of each proposed lot.
 - Access to each proposed lot.
 - Utilities serving each proposed lot.
 - Required setbacks and proposed distances from the proposed lot lines to proposed structures.
 - Rationale for the proposed LLA.
- **Title Block.** Include the property owner’s name, and the plan preparer’s name, email, phone number, stamp, and signature for all sheets. The property owner’s name is missing from most all sheets, and is given inconsistently, when provided, as The

Mission LLC or Industrial Partners Group; please reconcile. The plan preparer's information is missing from the General and Architectural sheets.

- **Project Plans.**

- *Elevation Drawings.*

- Per the Project Plan Submittal Guide, Elevation drawings are needed for each building face related to the scope of work. Please provide an elevation for each face of the building, including those that are interior to the overall structure. (Moved from Section III, Additional Information Required.)

Thank you for providing further elevation drawings; however, the labels, in terms of Wing 1 and Wing 2, do not match those of the Site Plan (Sheet A.0.01). Please reconcile.

- Per the Project Plan Submittal Guide, Elevation drawings must show the existing and proposed grade planes and heights of all buildings. (Moved from Section III, Additional Information Required.)

Thank you for providing existing and proposed grade planes and heights of all buildings on some elevation drawings; however, it must be provided on all elevation drawings.

- Per the Project Plan Submittal Guide, Elevation drawings must also show the following:

Width and vertical clearance of garage doors, exterior landings, and height of planter walls. (Moved from Section III, Additional Information Required.)

- *Material Specifications.* Include large-scale drawings of significant architectural elements, such as handrails, guardrails, arches, columns, window and door details, etc., as noted on the [Project Plan Submittal](#) handout. (Moved from Section III, Additional Information Required.)

Thank you for providing information on materials and colors on Elevation sheets A.2.01, A.2.02, A.2.03, and A.2.04, and material specification sheets A.5.01, A.5.02, A.5.03, and A.5.04. Please also provide a comprehensive set of detail drawings for all significant architectural elements of the project; include stairs, arcades, arches; cornices, canopies; trellis members; columns, column bases, capitals, and details; parapet walls; finials, and towers, as applicable.

- *Landscape Plans.*

- The Conceptual Irrigation Legend (called the Irrigation Schedule in the previous submittal) on Sheet CI-1 is inconsistent with the Conceptual Irrigation Legend Irrigation Schedule on Sheet CI-2. Your response letter indicates that the Conceptual Irrigation Legends have been reconciled; however, Zone 3 and Zone 7 colors remain inconsistent. Please reconcile. (Moved from Section III, Additional Information Required)

- *Project Data.* Identify:

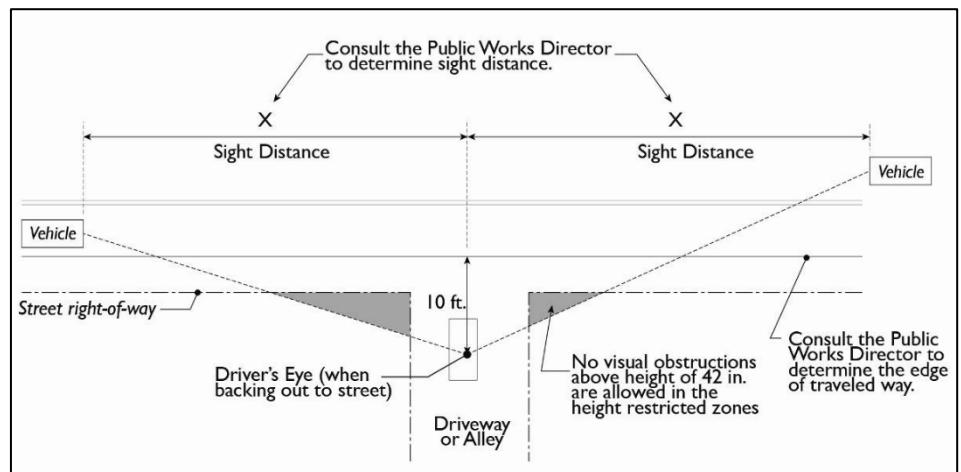
- Identify any Excluded Areas: i.e. vent shafts, lofts, crawlspace, attics, mechanical rooms.
 - Your response letter states that excluded areas include vent shafts, attics, and mechanical rooms; however, the requirement is to provide this information on the plans in the Project Data to demonstrate the specific areas in the plans that are Excluded Areas. (Moved from Section III, Additional Information Required.)
 - Your April 12, 2025, response letter states that excluded non-habitable areas are identified and labeled on the floor plans, shown in light blue, and are not included in the Building Floor Area square footage; however, the requirement is to provide this information on the plans in the Project Data to demonstrate the specific areas in the plans that are Excluded Areas.

- **Fences and Hedges**

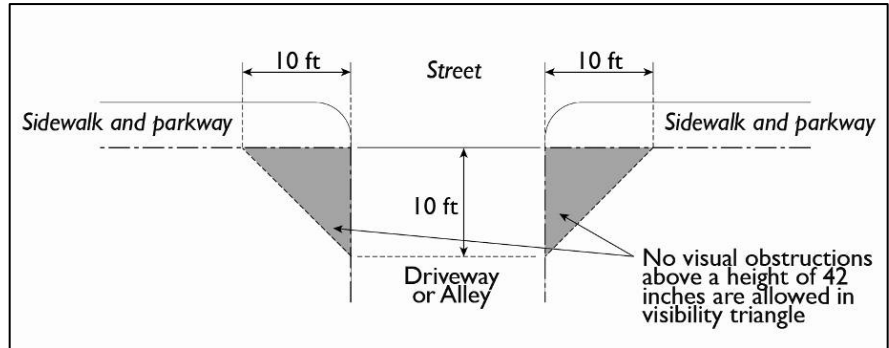
- This item has been moved from Section III, Additional Information Required.

Show the Site Visibility Triangle per SBMC §[30.140.230](#), Visibility at Driveways and Intersections for the proposed development, including public improvements. ~~Your response letter indicates that this information is provided on the Civil Sheets, however it is not provided on any sheet in the plan set.~~ See below for further clarification on how to depict this on the plans.

- **SBMC §30.140.230.B Driveways.** Visibility at a driveway that crosses a front property line shall not be blocked above a height of 42 inches within the triangle areas described below:



- Street with Sidewalk and Parkway. When a driveway directly abuts a portion of a street with a sidewalk and parkway, the triangle is measured on two sides by a distance of 10 feet from the side of a driveway and 10 feet back from the front lot line.

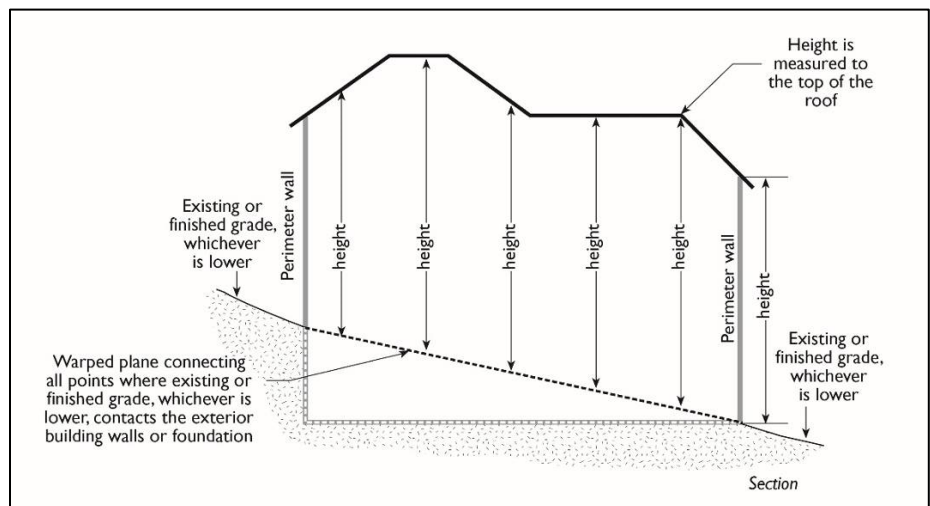


- **Building Height** (the following comments were moved from Section III, Additional Information Required)

Identify building height on each elevation drawing and on any sections provided. Building height is measured from every point on top of the building roof or roof parapet to a warped plane directly below connecting all points where existing or finished grade, whichever is lower, contacts the exterior building walls or foundation system. See SBMC §30.15.090.A for additional information. Building heights are not dimensioned on Sheet A.2.02. Building heights on Sheet A.2.03 are not dimensioned for the elevation labeled, "Wing 2 – South Elevation," and are shown incorrectly on the right side of the elevation labeled, "Wing 2 – West Elevation." Please revise. Although building height was identified on the elevations, it was not shown correctly.

See below for further clarification on how to depict this on the plans.

- **SBMC §30.15.090.A. Measuring Building Height.** Building height is measured from every point on top of the building roof or roof



parapet to a warped plane directly below connecting all points where existing or finished grade, whichever is lower, contacts the exterior building walls or foundation system.

- **Hazardous Waste Sites.** Staff will likely require a Phase I Environmental Site Assessment be prepared for the project as part of the environmental review process. This is because the site is identified as being adjacent to a site having current or past soil or groundwater contamination.
- **Historic Site Determination.** Consistent with Government Code Section 65913.10, the City has determined that the property is a historic site.
- **Design Review Compatibility Analysis.** Staff will schedule the project for a compatibility analysis pursuant to SBMC §22.68.045.C. once environmental review has been completed and plans sufficient for design review have been submitted.

As stated previously, the subject site is located within El Pueblo Viejo Landmark District, Part II; contains resources listed on the Historic Resources Inventory; and is adjacent to the Mission Historic Park, a designated historic landmark.

- See SBMC §30.157.050.C., *Procedure for Removing Historic Resources from the Inventory*, which outlines the process to request removal of a resource from the Inventory. In this case the report required for the technical study will replace the Significance Report completed by the Staff Architectural Historian.
- See SBMC §30.57.030.B.1., *Spanish Colonial Revival/Mediterranean Style Required*, which states that any structure, site or feature hereafter constructed or altered as to its exterior appearance and located within El Pueblo Viejo Landmark District shall, as to its exterior architecture, be compatible with the Spanish Colonial Revival/Mediterranean tradition as it has developed in the City of Santa Barbara from the later 18th century to the present, with emphasis on early 19th century California Adobe styles, and Spanish Colonial Revival/Mediterranean styles of the period from 1915 to 1930.
- **Design Review Findings.** In addition to any other considerations and requirements specified in this code, the following findings shall be considered by the Historic Landmarks Commission when it reviews and approves or disapproves the design of a proposed development project in a noticed public hearing pursuant to the requirements of Chapters 30.175. and 30.220.
 - SBMC §30.175.110.G.: Demolition of Historic Resources other than Landmarks. A proposal to demolish a historic resource other than a Landmark may only be approved if the Historic Landmarks Commission has made at least one of the following findings:
 1. Specific measures have been incorporated into the project scope to mitigate the loss of the historic resource to a less than significant level;
 2. The historic resource has been damaged by an earthquake, fire, or other similar casualty such that its repair or restoration is not reasonably practical or economically feasible as supported by substantial evidence provided by at

least one qualified structural engineer or architect qualified in historic preservation. The Historic Landmarks Commission may require, as conditions of approval of a demolition, that the property owner(s) salvage historic materials from the property and/or provide archival quality photo documentation of the remaining historic materials of the structure, site or feature to the City;

3. Preservation of the historic resource is not economically feasible or practical, or no viable measures could be taken to adaptively use, rehabilitate, or restore the historic resource as supported by substantial evidence provided by at least one qualified historic preservation specialist, structural engineer (qualified in historic preservation), or architect (qualified in historic preservation) sufficient to warrant demolition; or
 4. A compelling public interest justifies demolition.
- SBMC §30.220.020.F. Project Compatibility Findings:
 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, or City Landmarks or 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; or
 6. Use of Open Space and Landscaping. The project includes an appropriate amount of open space and landscaping.

- **Technical Studies.**

Staff has conducted a preliminary review of the project, as submitted, against potential environmental issues and anticipate that the currently proposed project would not qualify for an exemption from CEQA. The following technical studies would likely be requested at the time a formal environmental evaluation of the project commences, to determine if the project may have a significant effect on the environment.

- Aesthetics. The subject site is located along a portion of a roadway that meets State Scenic Highways Advisory Committee standards for eligible State highways, which is described in the City's General Plan Circulation Element, as

follows: Sycamore Canyon Road (144) from Alameda Padre Serra to Stanwood Drive (192), Stanwood Drive to Mission Ridge Road (192) where it intersects with Mountain Drive, Mountain Drive (leaving 192 which continues on Foothill Road) to the Old Mission on Los Olivos Street. This route has historic significance because it travels along preserved remnants of a Native American (Chumash) water system and terminates at the Santa Barbara Mission.

As such, visual simulations shall be provided that demonstrate the proposed project's relationship to height limits of the City Charter, and how the project would integrate into its surroundings. The visual simulations shall include views southwest from Mountain Drive, that include the St. Anthony's Seminary Complex towers; views southwest from Mountain Drive where it intersects with Los Olivos Street; views north from Los Olivos Street where it intersects with Laguna Street that include the Mission Santa Barbara; and views northwest from Los Olivos Street where it intersects with Alameda Padre Serra that include the Santa Ynez Mountain range. Provide an analysis of project visual impacts using the Aesthetic Impact thresholds in Appendix G of the CEQA Guidelines.

- Air Quality (AQ). Provide an AQ Technical Memo that includes air emissions estimates based on California Emissions Estimator Model (CalEEMod) outputs for both construction and operation of the project.
- Arborist Report. Submit an arborist report that includes a tree protection plan for all trees proposed for retention as part of the project. The report and/or landscape plans should accurately represent the dripline for the trees being retained and their proximity to construction activities.
- Archaeology. The subject site is located within several Archaeological/Cultural Resource Sensitivity Zone(s): Prehistoric Sites and Watercourses, Mission Archaeology, American City, and Early 20th Century. The following archaeological reports have previously been prepared for the subject site:
 - i. Phase 1 Archaeological Resource Evaluation prepared by Larry R. Wilcoxon and Ethan Bertrando, dated January 21, 1994.
 - ii. Phase 2 Archaeological Investigation prepared by David Stone, M.A., RPA and Ken Victorino, M.A., RPA, dated March 2014.
 - iii. Final Phase 3 Archaeological Mitigation Report prepared by David Stone, M.A., RPA, Ken Victorino, M.A., RPA, and Heather McDaniel Wilcox, M.A., dated June 2014.

An updated Phase 1 Archaeological Report is required due to the differences in scope of work and proposed ground disturbance; it shall reflect the proposed project description and assess the potential for impacts to cultural resources. It shall be prepared by a qualified archaeologist and submitted for review and acceptance by the Historic Landmarks Commission.

- Biological Resources. The subject site is located within several areas of biological sensitivity. As a result, a Biological Assessment is required; it shall be prepared by a qualified biologist and submitted for review and acceptance by the City Environmental Analyst. Please ensure the report identifies any sensitive habitat

communities; assesses the potential for special status species to occur; assesses potential impacts and identifies any mitigation measures; includes an identification of all trees on site and recommended tree protection or mitigation measures; and a jurisdictional delineation assessment to identify any jurisdictional resources.

- Geology/ Soils. The subject site is located in an area mapped as containing high expansive soils, erosion, and landslide hazard potential. Due to the scope of the proposed project, a Preliminary Geotechnical Investigation/ Assessment is required; it shall be prepared by a qualified geologist and submitted for review and acceptance by the City Environmental Analyst. Please ensure the report includes an assessment of the grading and engineering that would be required for a feasible project of this scope.
- Greenhouse Gas Emissions (GHG). A Quantitative GHG Analysis is required to demonstrate whether the project is consistent with the City's Climate Action Plan. Please reference City's Master Environmental Assessment Guidelines for GHG Emissions Analysis.
- Vehicle Miles Traveled (VMT). Per the City's Master Environmental Assessment Guidelines for Transportation Analysis, the proposed project would result in 1,718 average daily trips. A CEQA analysis of the VMT impact is required using the Santa Barbara Travel-Demand Forecasting Model (SBTDFM). The applicant will be required to use the City's Transportation Consultant, Iteris, for this analysis. Applicant to finalize scope of project and Iteris will provide a cost of their services. The applicant will pay the fee to the City and then the City will reimburse Iteris for the VMT analysis. Please anticipate that the project will be required to reduce VMT. Please reference City's Master Environmental Assessment Guidelines for Transportation Analysis Appendix E.
- Traffic Operations and Emergency Access Assessment. Traffic corridor, safety, and emergency access assessment is required from the Laguna Street/Los Olivos Intersection to the Los Olivos/Alameda Padre Serra Intersection, including Intersection Control Evaluations (ICE) at both intersections. Please refer to Caltrans Traffic Operations Policy Direction 13-02 for details on what to include in the assessment

As part of the environmental review process, Traffic Engineering will decide whether the Project will or will not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Traffic Engineering and the Fire Department will also make a determination if the Project will or will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

- Historic Resources. The subject site is located within El Pueblo Viejo Landmark District, Part II, and contains structures that have been listed on the City's Historic Resources Inventory since 1986: the Mission Hill house, a Victorian house constructed in 1885 for the Rowland Hazard family; the Dial Residence, a Tudor

style house constructed in 1916-1917 for Rowland G. Hazard II; and sandstone walls.

Furthermore, the subject site is adjacent to the Mission Santa Barbara, a historic resource designated as a landmark on National, State, and local levels; the Saint Anthony's Seminary Complex and Grounds 2300 Garden Street, a historic resource designated as a landmark at the local level; the Mission Historical Park, a historic resource designated as a landmark at the local level that extends from the A.C. Postel Memorial Rose Garden on Plaza Rubio to the north side of the Mission Canyon Bridge, and includes the historic bridge and walls that run along the public right-of-way (East Lost Olivos Street); and the Santa Barbara Natural History Museum, a historic resource designated as a Structure of Merit designated at the local level.

The California Environmental Quality Act (CEQA) Guidelines §21084.1, and §15064.5 are the guiding principles in the process for historic preservation review in California for discretionary review. CEQA considers historic resources to be part of the environment. Thus, any time a development is proposed, identification of historic resources and any impacts to historic resources are part of the Environmental Review of a project. CEQA requires the City to evaluate properties for historic significance upon submittal for discretionary review of a project to ensure identified historic resources and unidentified historic resources are not altered inappropriately or demolished without appropriate evaluation, opportunity to consider appropriate alternatives to avoid adverse impacts, public and Historic Landmarks Commission review and, if necessary, mitigation.

As a result, a Phase I Historic Structures/Sites (HSSR) report is required; it shall be prepared by a [qualified historian](#) and submitted for review by City's Architectural Historian and Environmental Analyst, followed by review and acceptance by the Historic Landmarks Commission.

Please note that a Phase II HSSR may also be required, depending on the conclusions made by the Phase I report. If the sidewalk corridor needs to be relocated behind the sandstone wall (from the existing second driveway to the north property line, due to the sandstone walls, remnants of the California Aqueduct, and mature trees) it would need to be included in the Phase II analysis, along with the rest of the project.

- Water Supply. A hydraulic modeling study is required to be submitted by a consultant; it shall assess whether the current water line has the capacity to serve the proposed project; and if an upsized would be required, what effect would it have to our current system (e.g. would it starve other areas, how would it impact reservoirs in the area, etc.). Previous city studies and projections have been based on General Plan projections, which do not anticipate a project of this scale for the subject site.
- **Tree Removal**. SBMC Chapter 15.24 (Preservation of Trees) regulates tree removal and the degree of pruning allowed for privately owned trees. ~~The removal of trees in a required front setback or City right-of-way (SBMC Chapter 15.20) requires a permit from the Parks and Recreation Department. Please contact Parks and Recreation~~

staff for further information. The removal of trees in a required front setback or City right of way, on a lot within El Pueblo Viejo Landmark District, requires approval of the HLC. (SBMC §15.24.055)

- **Story Poles.** The HLC may require that story poles be installed for this project, as outlined in the [Visual Aids & Story Poles](#) Supplemental Application. They may also be required for purposes of environmental analysis.
- **Landscape Plans.** New buildings require a landscape plan before design review Final Approval can be granted. The project must comply with defensible space requirements for landscaping due to its location within the Foothill Zone High Fire Hazard Area. Review the [Landscape Plan Submittal Guide](#) for the required contents of a landscape plan. Landscape plans must comply with Landscape Design Standards for Water Conservation, SBMC Chapter 22.80.
- ~~**Additional Fees.** Please be aware that projects that require a third or subsequent Planning Application review submittal are required to pay one fourth (1/4) of the highest application fee for the project. (Moved to Section III, *Additional Information Required.*)~~
- **Additional Notices Required.** A mailed notice will be required at the following public hearings: 10 days prior to a first Concept Review hearing and 10 days prior to the first Project Design Approval hearing. Additionally, notices will be required for all environmental review hearings, and all required Planning Commission and City Council hearings. A fee is required for each mailed notice. You will be invoiced the additional noticing fee before each noticing period; fees must be paid prior to scheduling.
- **Revisions Threshold.** Per Government Code Section 65941.1(c), an applicant would be deemed to have not submitted a preliminary application if the development proponent revises the project such that the number of residential units or the square footage of construction changes by 20% or more. As currently designed, the submitted project is within this 20% threshold.

B. Building & Safety Division

Staff Contact: Jimmy Martinez, JWMartinez@SantaBarbaraCA.gov; 805-897-2528

The following comments are intended to be advisory in nature to identify any potential deal breakers; this is not a comprehensive plan review. A comprehensive plan review will be performed when the project is submitted for a building permit.

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

1. 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. Indicate on construction plans 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.

3. 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.
4. Provide approval of State Storm Water Permit prior to commencement of project. Plans to show compliance with Section 5.106.2 (2022 CGBSC).
5. 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.).
6. 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.
7. Soils report to be included in plan.
8. 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.
9. 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).
10. Grading survey and report will be required before foundations are poured or inspections are requested.
11. Temporary Power plan to be contained within Electrical Sheets. Utility clearance and locations of temporary poles, transformers, equipment (job trailers) to be provided.
12. Job trailers – provide mounting, and seismic restraint details (Require separate permit). Trailers utilized for sales / advertising are required to comply with the applicable sections of Chapter 11B (2022 CBC).
13. Please include County of Santa Barbara Environmental Health Services approved plans within the construction documents.
14. Provide Type of construction.
15. Provide actual vs allowable square footage per CBC Chapter 5.
16. Ensure maximum travel distance. Delineate and annotate any rated corridors, interior egress stairs and/or, exterior egress stairs.
17. Ensure that the size of the elevator will be sufficient to comply with all applicable portions of 3002.4 (ambulance stretcher).

18. Ensure that each required accessible means of egress will be continuous to a public way and shall comply with 1009.2 (2022 CBC).
19. An elevator will be required to be incorporated as part of the accessible means of egress system where an accessible floor is four or more stories above the level of exit discharge per 1009.2.1. Standby power required per 1009.4.1. Area of refuge per 1009.4.2.
20. Underground parking structures to comply with applicable Sections of Chapters 4 & 5 (2022 CBC) as well as Section 120.6(c) (2022 CEnC).
21. Project to provide full compliance with Chapter 11B (2022 CBC).
22. 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.
23. Provide total accessible vs adaptable dwellings units per CBC 11A or 11B as applicable depending on funding.
24. If privately funded; all adaptable units must comply with CBC 1128A which includes requirements for door widths, accessible routes, bathroom and kitchen designs.
25. **Energy & Green Requirements** – Project to comply with the Mandatory PV & Battery Requirements for New Construction per 140.10(a) & (b) (2022 CEnC).
26. **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 Section 5.106.5.3 (2022 CGBSC): New construction to provide electric vehicle infrastructure and facilitate electric vehicle charging shall comply with Section 5.106.5.3.1 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.
27. **Energy & Green Requirements** – Please provide a commissioning plan per Section 120.8 (2022 CEnC) & Section 5.410.2 (2022 CGBSC)
28. **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.
29. 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.
30. Prior to the start of the project an address must be visible from (start of driveway) near the E. Los Olivos St. & Alameda Padre Serra Junction for Emergency vehicles as well as City staff.
31. Provide prominent note on cover sheet containing work hours for project.
32. Please know that projects of this nature are time consuming and may require additional comments.

Staff Contact: Chris Short, CShort@SantaBarbaraCA.gov; 805-897-2528

33. Flood Zone:

- a. The subject site contains areas located within a FEMA AE Regulatory Floodway and Floodway Fringe as depicted on the City's Federal Insurance Rate Map (FIRM) 06083C Panel 1379H. Restricted site work includes staging areas, tree or vegetation removal, grading, cut/fill and soil recompaction.

~~A "No-Rise / No-Impact" Certification will be required Prior to issuance of a grading or building permit which may impact the Regulatory Floodway or the Floodway Fringe. The "No-Rise / No-Impact" Certification shall be prepared by a qualified licensed California engineer documenting the necessary technical data indicating the proposed development will not impact the Regulatory Floodway channels base flood elevations, floodway elevations or floodway widths at published or unpublished cross sections listed in the effective Flood Insurance Study.~~

Provide a site civil engineering drawing locating the Regulatory Floodway and Floodway Fringe boundaries.

- b. Accurately show the AE floodplain and the AE floodway (hatched), as identified in Figure 2 below, on Sheet A.0.01. Identify all proposed structures, buildings, flat work, and site walls on this plan.

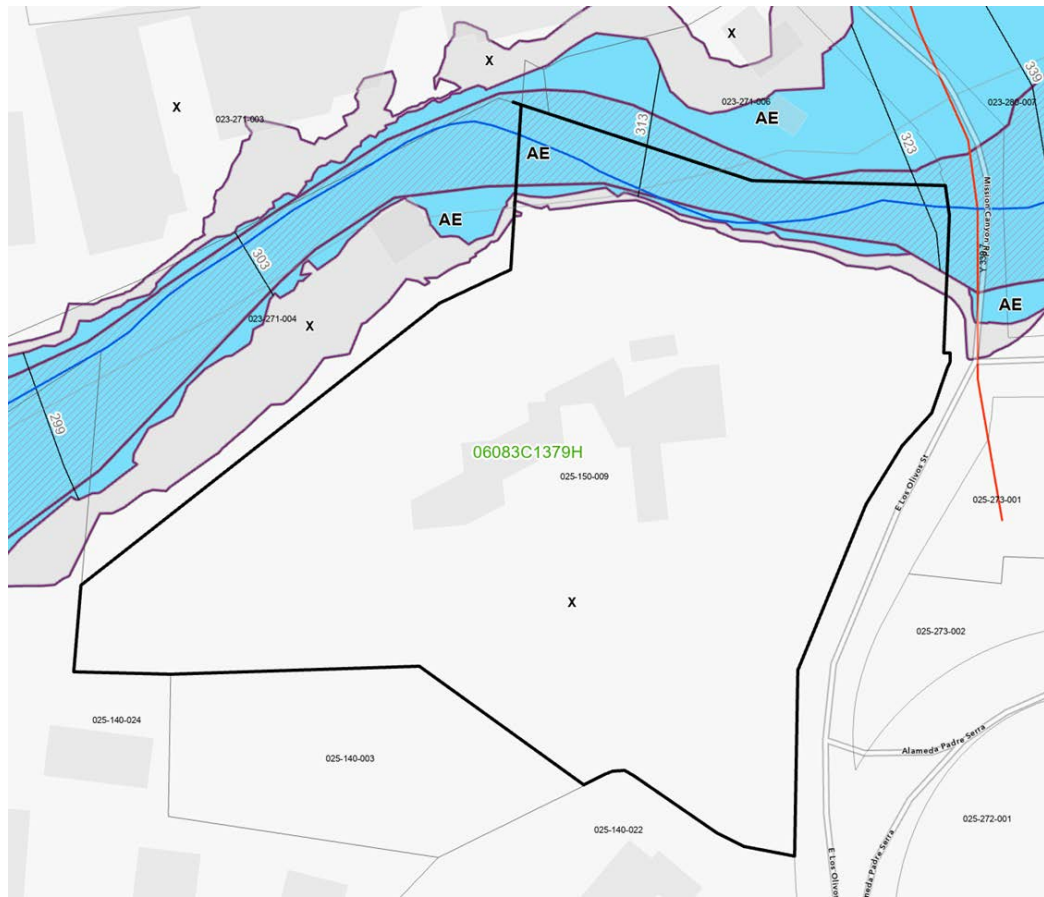


Figure 1. Floodplain and Floodway Outlines

The following two comments have been moved from Section III, *Additional Information Required*.

- c. Provide a Base Flood Elevation Assessment prepared by a certified California surveyor.
- d. Revise plans to show the Base Flood Elevation (BFE) and Design Flood Elevation (DFE), as defined by the above assessment.

C. **Engineering Division**

Staff Contact: Michael Cloonan, MCloonan@SantaBarbaraCA.gov; (805) 564-5365

1. **Grading and Drainage Plan.** Reference Building & Safety and Planning sections regarding onsite grading. Sheet C-2 makes reference to a curb outlet drain to Los Olivos flow line but lacks detail. Please provide additional detail including reference to City Standard Details. This must be done prior to Building permit issuance.
2. **Preliminary Merger Comments.** The topographic survey Sheet G03 V-01 indicates two legal lots (Parcel 1 and 2). The City will require a certificate of lot merger prior to Building permit issuance.
3. **Utility Service Plan.** Please show and identify on a separate "C" Utility sheet (as needed to demonstrate this requirement) in this plan submittal, all project site existing and proposed Water and Sewer Utility service sizes and points of connection to City infrastructure and/or within the Public Right-of-Way. Show and identify all existing and proposed Storm Drain Utility service sizes and points of connection to City infrastructure, the Public Right-of-Way, and/or recognized existing Water Course(s).
4. **Street Lighting.** Reference Transportation comments and plan Sheet A0.01. Thank you for describing that streetlights will be installed. Please update plan Sheet A0.01 to indicate Type B lights will be installed just to the northeast of the driveway, 100' northerly along E Los Olivos St, and again at the "T-intersection" with Mountain Drive. In other words, call out the location of a total of three lights.
5. **Preliminary Title Report.** A standard Title Report that includes information on easements has not been provided; please be aware that you are proceeding at your own risk in this regard, as staff has not been able to review easements or other similar information contained therein.
6. **Declaration of Lot Line Adjustment (LLA).** LLA's require Discretionary Approval reviewed and acted on by the Staff Hearing Officer in compliance with SBMC Ch. 27.40. Please clearly show and accurately identify the existing and recently proposed: "LOT LINE ADJUSTMENT TO THE PROPERTY LINE FOR PARCEL 1 & 2" as stated on Cover Sheet/Project Info sheet G001a in *Project Description / Scope*, on the following sheets:

- Cover Sheet/Project Info - G001a, section: Building & Lot Data Summary
- Grading and Drainage Plan - C-2
- Site Plan - A.0.01

D. **Wastewater**

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

1. 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.
 2. All Discharges must comply with Local Limitations on Wastewater Strength per SBMC §16.04.120.
 3. Wastewater reserves the right to determine the need for system improvements at the project's expense to ensure the wastewater system's reliability and provide adequate capacity to handle additional flows from the project site. Wastewater reserves the right to determine the point of connection to the City's sewer main. Based on the fixture calculations provided by the applicant, at this time we do not foresee the need for improvements to the collection system; however this will be more fully evaluated as part of environmental review. When applying for a building permit, please provide the current fixture calculations to determine if upgrades to the system are required at that time.
 4. Abandonment of existing lateral(s) must be completed in accordance with the City of Santa Barbara's Sanitary Sewer Standard Details.
 5. The City requires that all pool and spa water discharges remain on private property or in a sanitary sewer on private property. It is a violation of the City's Municipal Code to drain swimming pools and hot tubs into the street, gutter, or storm drain. Include pool drains in utility plan and estimated drain flow rates with estimated wastewater flow calculations for confirmation of sewer system capacity.
 6. 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.
 7. The City reserves the right to require a Grease Control Device to be installed per City of Santa Barbara standard details for any discharges falling within the definition of a Food Service Establishment. Dish machine discharge and mop sink must not connect to the Grease Control Device (GCD).
 8. **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 will be 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. Thank you for providing the City with fixture calculations. City staff will work with a consultant to model the project and determine if upgrades to the collection system will be required as a result of this project.

9. Please provide comprehensive Utility Plans, ~~Plumbing Plans,~~ and Civil Sheets. 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. (Moved from Section III, *Additional Items Required*)

E. Water Supply/Distribution

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

Water Supply

1. Each residential unit must be served by a dedicated private water submeter or submeters. 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.
2. Commercial space(s) must have their own water meter(s) located in the public right-of-way. City recommends separately metering each commercial space.
3. A City master meter in the public right-of-way is required to serve the private submeters. It may only serve residential uses. Separately metering the residential amenities (gym and pool), although not required, is an option especially for high water demand spaces.
4. A dedicated irrigation meter in the public right-of-way is required if the irrigated area exceeds 1,000 square feet.
5. Show all meters on plans. Label each meter with the proposed size and what it will be serving. Identify if existing meters will be abandoned or retained. If retained, identify what they will be serving.
 - a. Show a City master meter in the public right-of-way, which is required to serve the private sub-meters (Note: This is required because there is not adequate space for all the required residential meters in the public right of way). It may only serve residential uses. Advisory -Two master meters from separate water mains may be necessary to meet residential demands in addition to the irrigation and fire line(s).
 - b. A fixture count is required to determine correct meter size for the residential master water meter.
6. A fixture count will be required to support the meter size requested for the residential master water meter.
7. Applicant may want to consider a second residential master meter and fire line to serve redundant connections off of a separate water main to ensure continuous water service in the event service from one main becomes temporarily unavailable due to a break or maintenance needs

Distribution

1. Please provide the following information for completeness and a run of our water model, as water system upgrades may be required to adequately serve this project.:
2. Domestic flow,

3. Fixture calculations
4. Landscape flow,
5. Fire flows,
6. Sizes and number of desired water services.
7. The application must include a civil sheet showing the location of the property in relation to City water mains, and all points of connection to the City's water system. Once the application is deemed complete, the City will run the model (at the project's expense).
8. This information will be used to determine if the existing water infrastructure can serve your project without adversely affecting the public water system or the surrounding neighborhoods. Please forward the required information to Jeff Becker (JBecker@SantaBarbaraCA.gov and Backflow@SantaBarbaraCA.gov)
9. Measures must be taken to ensure the City's Water Reservoir is protected from grading or drainage changes on the project site.
10. Protect in place existing water infrastructure.
11. 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. These inspection(s) are to be completed prior to project Final.
12. Backflow assemblies are required at residential master meter, irrigation meter and fire line. Additional backflow protection may be required based on findings from inspections, assessments, surveys and plan review.
13. There is not adequate space for all the required residential meters in the public right of way, a residential master meter shall be required to be installed in the public right of way. Two master meters from separate water mains may be necessary to meet residential demands in addition to the irrigation and fire line(s).
14. If fire hydrants are required inside the property, they must be served by a separate, dedicated water line which shall include a meter and backflow assembly.
15. Detail your intentions for the site's existing water meters/services.
16. ~~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 Carson Wollert, Supervising Engineer with the City, to run the model at the project's expense.~~
17. 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 to loop the privately owned water main within the proposed development.
18. Please provide comprehensive Utility Plans, Plumbing Plans, and Civil Sheets. Your response letter indicates this information is provided on Sheet C-2 (Grading and Drainage Plan); however, this is not the case; please show all proposed connections to the City's water system, their locations, and sizes. C-2 Civil Sheet

only shows. "Protect Existing 2" Water Connection in Place". A 2" water service connection is not adequate to serve the proposed number of units. Please show all proposed new (N) connections to the City's water system, their locations, sizes, and purpose served. Please show all existing (E) water service connections to the City's water system, their locations, sizes, and intentions or abandonments.
(Moved from Section III, *Additional Items Required*)

19. The City does not support the application of any large trees along the shared property line with our water reservoir. Any tree roots that encroach or penetrate the reservoir walls shall be removed at the property owner's expense. Any damage to the reservoir caused by construction of the property owner's improvements, or the improvements themselves, shall be repaired at the property owner's expense. (SBMC §22.21.010 and §14.20.050)

Conservation Landscape

1. Be advised that all new/revised landscape areas shall comply with the 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. Be advised City sources do not consider *Sesleria autumnalis* as low water using. We can address this during the building permit phase.
2. An irrigation plan will also be required during prior to design review Final Approval and at the building permit phase. Find more details at www.santabarbaraca.gov/WELS
3. Per SBMC § 22.04.060, all fountains and other decorative bodies of water of any depth directly plumbed by potable water, on a single parcel of land, shall not exceed a total water surface area of twenty-five square feet.
- ~~4. All appropriate landscaped areas must be covered with at least 3" mulch, organic is preferred.~~
- ~~5. Include the 2023 Landscape Compliance Checklist directly on a plan sheet. Ensure it is completed and signed by the plan's preparer. Find at www.SantaBarbaraCA.gov/WELS SBMC §14.23.005~~

F. Transportation Division

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

1. **Dimension Right of Way and Public Improvements per SBMC Ch. 22.44 on Civil, Landscape and Architectural Plan Sheets along E. Los Olivos and Mission Canyon Road Property Frontage.** Please provide a survey from a Licensed Surveyor with boundary information and clearly delineate existing right of way. The right of way varies along Mission Canyon adjacent to the property. The entire right of way width shall be called out in Sheet V-01. A portion of the driveway to the subject property is not a part of the subject property. An access easement may need to be provided from APN 023-140-022. (Moved from Section III *Additional Information Required*)
2. The project's sidewalk corridor width shall be a minimum of 12 feet including:

- 6-inch curb,
- 4 feet of furnishing zone,
- 6 feet of through pedestrian zone, and
- 1.5 feet of frontage zone.

The frontage zone may be located on the lot adjacent to the right of way. The Phase II HSSR will need to analyze the public improvements. Due to the sandstone walls, remnants of the California Aqueduct, and mature trees, the sidewalk corridor may need to be relocated behind the sandstone wall from the existing second driveway to the north property line. Sidewalk shall continue to the north property line, which means a pedestrian/bicycle bridge will need to be constructed adjacent to the vehicle Mission Canyon Bridge. The street cannot be narrowed to accommodate the sidewalk corridor. Note that zoning setbacks are measured from the back of any required dedication. (Comment moved from Section III, Additional Information Required.)

3. **Street Lighting.** Note that street lighting was added to the plan and detail. The actual placement of streetlights is not shown. They will be required to be spaced 100 to 250 feet apart along the sidewalk (not currently shown but is required). Please note that the lighting shall be placed in the sidewalk's four-foot furnishing zone. See Engineering comments for specific placement locations.
4. **Maneuvering.** All turnaround movements shall be accomplished in one maneuver: one maneuver is one back up and one forward movement. (Moved from Section III, Additional Information Required.)
5. **ADA Stalls.** Consult with Building & Safety regarding accessible parking stall requirements. (Moved from Section III, Additional Information Required.)
6. **Transit Stop.** Transportation Staff will be in contact with MTD to determine if a bus stop is warranted along the property frontage.
7. **Bicycle Parking.** There is often a relationship between a land-use and an expected bicycle type (i.e., cargo bikes or trailers at grocery stores or child trailers at schools). Nonstandard bicycle types such as recumbent bikes, folding bikes, cargo bikes, as well as traditional bikes equipped with child carriers, trailers, and/or baskets, which are common on utility bicycles, should be considered in bike parking design. Please provide bike parking for a wide variety of bike types.
8. **Traffic Generation Analysis and Consistency with the City's Traffic Management Strategy (Advisory).** Transportation staff performed a preliminary trip generation and distribution analysis for the proposed project to convert the vacant lot to 255 residential units. The City of Santa Barbara's traffic model was used to determine traffic effects using the model's specific traffic generation rates, which vary based upon use and location. The proposed project is in Model Area 3 and has an AM Peak Hour Trip (PHT) rate of 168.3 and a PM PHT rate of 158.1 trips for the 255 residential units. There is a trip generation credit for the existing religious facility of 6.13 AM PHT and 8.33 PM PHT. The project would result in a net increase of 162.18 AM PHT and 149.77 PM PHT. Distributing these trips to the city grid would use one percent or more of the intersection capacity at the identified existing/future 2030/2035 anticipated impacted intersections (State/Mission, US 101 NB and SB Ramps at

Mission Steet). Therefore, the proposed project would constitute a project specific traffic congestion effect.

9. **Minimum Stall Dimensions.** Dimension the proposed stall lengths and stall widths of the proposed uncovered and covered parking stalls. Standard parking stalls require a minimum of 8'-6" x 17'-6" per stall. Wider stalls may be required when parking bay widths are narrower than standard or vertical elements are adjacent to stalls. (Comment moved from Section III, Additional Information Required.)

Dimension the length and width of each of the proposed parking stalls.

10. **Minimum Bay Dimensions.** Figures 2 & 3 of the City's Access and Parking Standards provide minimum dimensions for 90-degree and angled parking for single loaded bays and double loaded bays. Parking stall angles less than 45 degrees are not permitted. Parking stall angles greater than 75 degrees and less than 90 degrees are also not permitted to minimize instances of automobiles exiting the wrong way. Parking lots with angled parking configuration shall be designed for one-way circulation. (Comment moved from Section III, Additional Information Required.)

11. **Compact Stalls.** In parking lots containing more than ten spaces, a maximum of 30% of all required automobile parking may be for compact cars. The minimum compact stall width is 8'. The compact spaces shall be distributed throughout the parking lot, rather than concentrated in one area to maximize access and usability. Dimension and identify the compact parking stalls. (Comment moved from Section III, Additional Information Required.)

12. **Maneuvering.** The onsite maneuvering depth varies in the latest plan set. When using the standard vehicle turning template, some of the parking stalls' turnaround movements cannot be accomplished in one maneuver (one maneuver is one back up and one forward movement). Part of the reason for this is due to not having adequate maneuvering depth and it is also due to not having an adequate buffer from the vertical elements (see g.). Below is the list of parking stalls that do not meet the requirements for ingress/egress maneuvering. To fix, look to widen the parking spaces or aisle. Please note that when addressing the issues for the spaces below, can cause spaces that work to no longer work. Staff requests a meeting the civil engineer/designer to review in detail and to go over the template turning ahead of the next plan submittal.

Sheet A.P.01: Parking stalls 12, 24, 25, 36, 41, 42, 45, 46, and 47.

Sheets A.P.02 and A.P.03: Parking stalls 4, 5, 7, 8, 9, 11, 13, 14, 16, 20, 24, 26, 27, 28, 30, 60, 69, 72, 76, 79, 82, 85, 89, 90, 91, 93, 94, 98, 99, 100, 101, 102, 111, 118, 119, 123, 124, 125, 128, 131, 132, 133, 134, 140, 155, and 157.

Sheet A.P.04: Parking stalls 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 19, 25, 26, 29, 31, 34, 37, 42, 46, 47, 52, 56, and 57.

13. **Location of Electric Vehicle (EV) Equipment.** Please provide locations of EV equipment and demonstrate on plans that they do not conflict with the minimum stall dimensions. Additionally, provide specifications of the proposed EV charger equipment for staff to review. (Comment moved from Section III, Additional Information Required.)

14. **Vertical Elements.**

If there is a vertical element in excess of 6" in height (e.g. walls) adjacent to a parking stall, an additional 1' of stall width is required to provide clearance. Update the plans to dimension the stall widths between each vertical element and include an additional 1'-0" stall width for each stall adjacent to a vertical element (e.g. Structural post, walls, etc.). ~~If there is a vertical element in excess of 6" in height (e.g. walls) adjacent to a parking stall, an additional 1' of stall width is required to provide clearance.~~

Thank you for providing the widths of groupings of stalls. However, what's required is to dimension the widths of all stalls adjacent to vertical elements such as structural posts and walls. Please note the parking layout does not have 1' buffers from the structural posts. Because of this the maneuvering does not work. See 11. above for the parking spaces with issues. (Moved from Section III, Additional Information Required.)

15. **Driveway Width.** Please dimension driveway. A two-way driveway is required with a minimum paving surface of 22 feet. (Comment moved from Section III, Additional Information Required.)
16. **Onsite Truck Service Lane.** Relocate the lane to the north side of the East Wing/Garage entrance. The current location is too close to E. Los Olivos Street and will encourage service and delivery vehicles to back up onto the public right of way, which is not allowed.
17. **Bicycle Parking Plan.** The project requires a minimum of one long-term bicycle parking stall per residential unit.
 - i. Provide a bicycle parking plan that includes bicycle parking locations, long-term designation, parking rack/device type (manufacturer's spec sheet), bicycle parking layout with dimensions, and enclosure details. a. Dimensions. Each standard surface bicycle parking space shall be a minimum of 2' x 6'. Show the minimum surface dimensions at each of the proposed bicycle parking locations.
 - ii. Minimize Obstructions. A minimum of 3' must be provided between each side of a bicycle rack and a vertical obstruction, such as a wall. When designing a bicycle parking facility, consider providing access from multiple sides to ensure all parking spaces can be used.
 - iii. Maneuvering. A minimum 5' aisle or space shall be provided for bicycles to enter and leave the facility. In an enclosed space where bicycles are parked perpendicular to a wall, the aisle shall have a width of at least 7' to the front or rear of a bicycle parked in the facility. Maneuvering space should allow for simultaneous users, provide for entry and exit of the facility and accommodate rack operations and lifting of bicycles where necessary.
 - iv. Include a manufacturer's specification sheet of the proposed bicycle rack on the plans.
 - v. Refer to Section 13 (pages 17-21) of the City's Access and Parking Design Standards for bicycle parking requirements.

(Comment moved from Section III, Additional Information Required.)

18. **Sight Visibility at Driveways.** ~~Your response letter states that this is provided on the Civil sheets, however it is not.~~ Please show sight visibility and the visibility triangle on the site plan including the required sidewalk improvements (i.e. street with

sidewalk and parkway visibility diagram). Demonstrate compliance with sight visibility at driveways and intersections per §30.140.230. Add a note that “no fence, screen, wall, hedge or other landscaping material exceeding a height of 3’-6” shall be located within the visibility triangle. Refer to SBMC §30.140.230 for additional information and visibility triangle diagram, and the Fences and Hedges comment above in Section III.A. of this letter. (Comment moved from Section III, Additional Information Required.)

19. **Driveway Aprons.** Confirm in a detail that the sidewalk is carried through at the same grade as the sidewalk across the driveway apron. (Comment moved from Section III, Additional Information Required.)
20. **On Site Loading.** Please show auto-turn with a delivery vehicle (WB40) in the onsite loading area (Moved from Section III, *Additional Information Required*)
21. **Vertical Curves.** Show driveway slopes and identify length of vertical curve in plan and section view of the parking garage and main driveway. Minimum vertical curve lengths provide for gradual transitions between a street/sidewalk and driveway and between a driveway and parking area.
 - i. If the slope of the driveway is 0 - 10%, a 5’ minimum length vertical curve is required.
 - ii. If the slope of the driveway is 10 - 16%, a 10’ minimum length vertical curve is required.
 - iii. When the slope of a driveway is rising to meet the sidewalk or garage level, 5’ of the driveway shall be the same slope as the sidewalk or garage level.
 - iv. Identify any ADA accessible routes. When an ADA accessible route across a vehicle ramp is required the maximum slope is regulated by the California Building Code. Please consult Building & Safety. (Moved from Section III, *Additional Information Required*)
22. **Printed Plans.** Once the plans have been updated to address all corrections, deliver a full-size printed plan of the proposed site plan (single sheet, print to standard scale) for Transportation staff review of the proposed parking design. Deliver to the lobby during counter hours, or to the drop off box in the hallway next to the David Gebhard room. Contact me directly when you have delivered the plans. (Comment moved from Section III, Additional Information Required.)

G. **Fire Department**

Staff Contact: Zach Wuchner, ZWuchner@SantaBarbaraCA.gov; (805) 564-5702

1. **Fire Alarm Systems.** CFC Section 907.1.2 - An automatic fire alarm system must be installed pursuant to city requirements.
2. **Fire Sprinkler.** The 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.
3. **Water Supply:** SBMC Chapter 8.04, Section 507.3 #2 and Section 507.5.1 - A COMMERCIAL type fire hydrant is required for this project. The hydrant must be located within 300 feet of all exterior walls by way of access. It must be provided

with one (1) four inch (4") and two (2) two and one half (2 ½") outlets and must have a fire flow in excess of 1250 gallons per minute. Please show location of nearest fire hydrant on plans. Include hydrant number, number and size of outlets and latest recorded GPM flow. While the location of the new fire hydrant on sheet C-2 may be within our distance requirement, its location will need to be approved by the Water Department as the hydrant will be located on private property. (Moved from Section III, Additional Information Required.)

H. **Environmental Services Division**

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

All comments below have been moved from Section III, Additional Information Required.

1. **Capacity.**

- a. Project requires containers for: Trash, Recycle, and Greenwaste.
- b. Show all proposed containers to scale on the site plan and indicate the size and waste stream of each (e.g. Trash 4 cubic yard dumpster, recycle 4 cubic yard dumpster, 95-gallon greenwaste cart).
- c. Waste generation can be calculated using the total number of bedrooms. Contact DRosales@SantaBarbaraCA.gov for assistance calculating the number of dumpsters needed onsite.

2. **Access.**

- a. Indicate the path of travel of the containers from the enclosure to the location where they will be serviced by the waste hauler. The enclosure should be located no more than 50' from the truck access point where the truck lifts the dumpsters.
- b. Path of travel cannot exceed 2% grade for dumpsters and must be smooth pavers, i.e. concrete. This can be shown on the site plan as a simple dashed line. Path of travel cannot include stairs of any kind.
- c. The waste hauler will not be able to empty dumpsters in parking garages unless ceiling height exceeds 20'.
- d. Show all pedestrian gates and hauler access gates in the open position. For swing gates, show open at 120 degrees. For sliding gates, show in the open position.
- e. Gate openings must be sized for the largest dumpster in the enclosure. The minimum gate opening for a 4 cubic yard dumpster is 105".
- f. For indoor locations where there will be food in the trash or Foodscraps bins, the trash/recycling area requires these additional features for sanitation:
 - v. Walls and floor constructed with a smooth finish that can be easily cleaned
 - vi. Mechanical ventilation, or with screened vent openings to the outdoors
 - vii. Floor drain with proper drainage slope that connected to the sanitary sewer
 - viii. Spigot with hose for cleaning

3. **Trash Chutes:** Separate chutes are required for trash and recycling. A greenwaste container can be made available on the ground floor for residents. Please indicate the path of travel from residential tenant spaces to the ground floor trash room for access to greenwaste and disposal of bulky items that do not fit in a trash chute. For trash chute approval you will need to provide the following:
 - a. Cross section building diagram showing trash chutes vertically for all levels.
 - b. Floor plan for ground floor enclosure. Show footprint of chute output. Ensure chute output is over the correct container type for trash or recycle.
 - c. Ensure vertical clearance for the height of the dumpster under each chute input.
4. **Dumpster Recommendation.** For dumpsters, look to incorporate interior curbs on the inside of enclosure walls to reduce damage over time. Please find an interior curb diagram on page 10 of our guide.
5. **Resources.** Our enclosure guide is available here with container dimensions on page 18, dumpster diagrams on page 11 and 15, and cart diagrams on page 16: www.SantaBarbaraCA.gov/EnclosureGuide.

I. **Creeks Division**

Watercourse

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

- The Creeks Division typically recommends a 50-foot setback from the top of bank for all new development on Mission Creek in order to protect water quality and the sensitive biological resources in the creek and prevent storm damage to structures during large flood events. The Creeks Division recommends that all development including buildings, structures, parking, patios, etc. should be constructed a minimum of 50 feet from the top of bank.
- Prior to Design Review Final Approval please provide a landscape plan that includes native riparian plants and trees within the setback area. 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.
- Please verify that the landscape plan for the project area outside of the creek buffer zone does not include any species known to be invasive in riparian areas. A list of invasive plant species is available from the California Invasive Plant Council (www.cal-ipc.org).

The following comments were moved from Section III, Additional Required Information.

1. Please identify on the site plans the top of the bank of Mission Creek as defined in SBMC §§ 30.140.050 and 30.15.040. It appears that sections of the bank are steeper than 1.5:1. Please provide the necessary cross sections to depict the angle of repose and calculated top of bank.
2. All development must be a minimum of 25 feet from the top of the bank of Mission Creek in accordance with SBMC § 30.140.050. It appears that the proposed development (i.e. foundation, retaining walls, buildings new patios, and other building

improvements) would be located within 25 feet of the top of the bank of Mission Creek.

- a. If development is proposed within the 25-foot development limitation area, approval from the Community Development Director will be required per SBMC §30.140.050.E, and must be found consistent with the Development Standards in subsection E per the Procedures in subsection G.
- Please depict a 25-foot and 50-foot setback from the appropriate top of bank on your site plan.

Storm Water

Staff Contact: Jim Rumbley, jrumbley@santabarbaraca.gov; (805) 603-1399

1. **Storm Water Management Program (SWMP).** This project must comply with Tier 4 (2020) SWMP requirements, since more than 15,000 sf of new/redeveloped impervious area is proposed. Tier 4 projects are required to demonstrate how the treatment requirement (1", 24-hr. storm), peak runoff discharge rate, and volume reduction requirements for the entire project site (i.e., entire parcel) . See Chapter 6 and Appendix C of the City's Storm Water BMP Guidance Manual for more information about meeting Tier 4 project requirements. Please be aware that if Planning Commission Review is required for this project, comments a. through i. must be addressed before the project is reviewed at the Planning Commission.
 - a. Before Design Review Final Approval, include a post-project exhibit in the storm water report that identifies all proposed new, redeveloped, and removed impervious area on the parcel. Also, confirm that the scale is accurately imbedded in the plan set pdf file, so it is possible to confirm the sf of each feature using the Adobe measuring tool within the pdf. For the new, redeveloped, and removed impervious areas identified on the exhibit, itemize each feature (i.e., provide the sq. ft. of every improvement individually) and provide totals for each category. For clarification, please refer to definitions below:
 - Proposed New Impervious Area – where impervious area (e.g., hardscape and roof) is proposed where there is existing pervious area (landscaping, permeable pavement, etc.)
 - Proposed Redeveloped Impervious Area – where impervious area (e.g., hardscape and roof) is proposed where there is existing impervious area (e.g., hardscape and roof)
 - Proposed Removed Impervious Area – where new pervious area is proposed (landscaping, permeable pavement, etc.) where there is existing impervious area (e.g., hardscape and roof)
 - b. Before Design Review Final Approval, modify the storm water report to use the lowest measured infiltration rate of 0.34 in/hr. and a design rate correction factor of 8. Alternatively, perform additional infiltration testing within the footprint of each proposed storm water improvement at the depth of the subgrade soil (i.e., the depth where storm water is proposed to infiltrate).

- c. Before Design Review Final Approval, modify the storm water report by changing the peak runoff discharge rate requirement heading to volume reduction requirement. Peak runoff discharge rate requirement heading is used twice in the report. Also, modify all tables in the report to be consistent with those in the report template located in Appendix B of the City's Storm Water BMP Guidance Manual. Currently, the table in the peak runoff discharge rate requirement section is missing information, and the table from the treatment section is missing. Include the treatment section in the report as well and include the proposed green roof and permeable pavement in the report. Also, include the HydroCAD output sheets used to calculate the peak runoff discharge rate requirements in the storm water report.
- d. Before Design Review Final Approval, modify the grading and drainage plan to indicate where storm water from all impervious area for the entire parcel will flow (i.e., clearly show how all hardscape will be treated by proposed BMPs). It must be demonstrated that no runoff requiring treatment is bypassing the proposed BMPs. Currently, it is not clear how storm water from the driveway, all roof area, and perimeter hardscape areas will be directed to the proposed storm water improvements. 100% of all impervious area on-site must be directed to proposed storm water infiltration improvements. Also, include a roof plan with all downspout locations, roof pitch, and flow directions.
- e. Before Design Review Final Approval, include cross-section details of all proposed BMPs that demonstrate compliance with requirements detailed in the City's Storm Water BMP Guidance Manual. The plans indicate permeable pavement and green roof areas are proposed. Include details for these. If you would like for the green roof areas to be considered a permeable surface, the detail must demonstrate that these areas will retain the 1" storm. Also, identify all locations, precisely, on the grading and drainage plan with call-outs and provide a reference to the location on the plans where the cross-section details are located.
- f. Before Design Review Final Approval, on the Civil plan sheets identify all proposed work in the Public ROW. Also discuss the scope of work in the Public ROW and storm water treatment in the Public ROW in the storm water report.
- g. Before Design Review Final Approval, on sheet C-3 or C-4 include a section with the proposed storm water infiltration chambers and demonstrate this feature will be constructed with level subgrade soil. Also, the section should demonstrate that the chamber system will have 9' of storage depth (60" chamber height, 12" of gravel below the chamber, and 36" above the chambers) per the specifications in the storm water report.
- h. Before Design Review Final Approval, on sheet C-5 for the storm water chamber details, remove all references to the underdrain. Infiltration and retention of storm water is required, and an underdrain system is not allowed. Also, Remove all references to geotextile/filter fabric along the subgrade soil. This is okay along the top, sides and in the isolator row at the base of the chamber, but not along the subgrade soil. Also, identify the elevated bypass manifold invert elevation above the top of all storage provided by the chamber system. Also, modify the details to indicate 12" of stone below the chamber

and 36" above the chamber to be consistent with the LID Design sizing user inputs. Also, in the user inputs modify the stone porosity to a maximum of 32% - change on C-5 and in storm water report – and modify the plans/sizing accordingly.

- i. Before Design Review Final Approval, on sheet C-2 for the proposed storm water chamber system, indicate the location of each inspection port. There must be a minimum of one inspection port per chamber row. Also, identify the perimeter of the gravel around the chamber system with a call-out. Also, correct the sheet reference for the chamber system details from C-4 to C-5. Also, identify the all inlet and outlet pipe invert elevations associated with the storm water chamber system. Also, demonstrate on the plans how the system will be maintained (i.e., how will a vacuum truck access and clean the system, is curved inlet pipe okay or straight pipe required – confirm with manufacturer). Also, identify the elevation of the chamber subgrade soil with a call-out.
- j. Before Design Review Final Approval, on the grading and drainage plan, add invert elevations and slopes of each pipe for the complete drainage system.
- k. Before Design Review Final Approval, demonstrate how pre-treatment for sediment and debris will be provided for all storm water improvements with storm water from impervious area tributary to them.
- l. 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.
- m. 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.
- n. Before the City Building Inspector will grant Certificate of Occupancy and finalize the building permit, the Building and Safety Division or their contracted QSP service provider must verify that all post-construction storm water BMPs were installed as approved and that they comply with the City's Tier 3 storm water requirements.
- o. For the building permit submittal, include a plumbing plan that demonstrates that storm water from all roof area will be directed to the proposed storm water infiltration improvements.
- p. 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 Dec. 2020 Storm Water BMP Guidance Manual.
- q. FYI - proposed impervious area is cumulative for two years after certificate of occupancy to prevent "piecemealing" of projects to avoid storm water requirements.
- r. For the building permit submittal, on the first sheet of the plans, adjacent to the list of "Special Inspections and Structural Observations," 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 called in by Contractor for inspection 72 hours prior to needed inspection. The City will then route to the QSP Inspector or third-party Company."

J. Parks and Recreation Department

Staff Contact: Justin Van Mullem, jvanmullem@SantaBarbaraCA.gov; (805) 897-1972

1. The Parks and Recreation Department is concerned about this project's impacts on the neighboring Mission Historical Park and Rose Garden given the scale of development, and requests the opportunity to review and comment on technical reports for applicable issue areas. The Department is concerned about compatibility with adjacent parks, recreation, and open space; and construction impacts related to historical resources, traffic, noise, and dust control.

VIII. KEY POLICY CONSIDERATIONS

A. Response Timeline – Documentation

A Preliminary Housing Application was accepted for this project on January 29, 2024 and would have expired on July 27, 2024. Submittal of the subject application on July 22, 2024 satisfied the requirement that the development proponent submit a formal application for the project within 180 calendar days of submitting the preliminary application.

On August 20, 2024 the City sent a Planning Application Response Letter via email to the applicant with written identification of specific information needed to complete the application.

On November 15, 2024, application materials were resubmitted. The response failed to provide all of the specific information needed to complete the application. On December 13, 2024, the City sent a Planning Application Response Letter via email to the applicant with written identification of specific information needed to complete the application.

On December 18, 2024, application materials were resubmitted. The response failed to provide all of the specific information needed to complete the application. On January 15, 2025, the City sent a Planning Application Response Letter via email to the applicant with written identification of specific information needed to complete the application.

On April 12, 2025, application materials were resubmitted. The response failed to provide all of the specific information needed to complete the application. On May 12, 2025, the City sent a Planning Application Response Letter via email to the applicant with written identification of specific information needed to complete the application.

On June 6, 2025, application materials were resubmitted. Staff accepts the response as providing all the information needed to complete the application. Fees associated with the new LLA application remain outstanding.

Please note that pursuant to California Government Code, Section 65941.1 (e), the development proponent shall submit said fees to the City within 90 days of receiving this

letter. If the development proponent does not submit said fees within the 90-day period, then the LLA application shall expire and have no further force or effect.

B. Project Consistency with Objective Standards

Please note that the City's review of this application to determine whether you have provided all of the material identified in the City's development application checklist does not include a final evaluation of the Project's consistency with development standards or a determination regarding which development standards are applicable to the Project. In accordance with the Housing Accountability Act, the City will evaluate the Project for consistency with applicable development standards within 60 days after the formal development application is complete. In the meantime, the City has not made a determination regarding which development standards apply to the Project, and the City's review of the application pursuant to the Permit Streamlining Act does not reflect a decision beyond the question of whether the application includes all of the information required on the City's development application checklist. However, the City has identified the following potential conflicts between the Project and adopted City standards for your consideration.

1. City Charter.

The development submitted under this application is in conflict with objective planning standards found in The Charter of the City of Santa Barbara (Charter), [Section 1506](#) (Building Heights. Limitations.) which states that building heights are limited to 30 feet in areas zoned for single family residences. The subject application proposes development of a parcel zoned RS-15 (Single-Unit Residential, 15,000-square-foot minimum lot size) that is over 30 feet in height. This section of the Charter has been in effect continuously since its approval by election held on November 7, 1972.

To be specific, Charter Section 1506 states, "It is hereby declared the policy of the City that high buildings are inimical to the basic residential and historical character of the City. Building heights are limited to 30 feet in areas zoned for single family and two family residences; are limited to 45 feet in areas zoned for residences for three or more families, for hotel, motel and office use; are limited to 60 feet in areas zoned for industrial, manufacturing and other commercial uses; and 30 feet for all other zones. The Council may, by ordinance, set limits of heights less than these maximums. The Council may, by ordinance, set up reasonable methods of measuring the heights set forth in this section. (Approved by election held November 7, 1972)"

- 2. General Plan.** The proposal, at a density of 57.8 units per acre, is inconsistent with the site's General Plan designation of Low Density Residential, 3 dwelling units per acre.
- 3. Zoning Map.** The Zoning designation for the site is RS-15 (Single Unit Residential, 15,000-square-foot minimum lot size). The project is inconsistent with the allowed residential housing type (single-unit residential) in that multi-unit housing is proposed. Additionally, the project significantly exceeds the maximum allowed density for the site. The maximum number of dwelling units would be

approximately 14 plus any allowed Accessory Dwelling units, which is significantly less than the 255 units proposed.

4. Zoning Ordinance. The project is inconsistent (or potentially inconsistent with, based on information provided with your next submittal) with the following objective zoning standards for the RS-15 zone.

a. Height. 30 feet allowed, over 90 feet proposed.

b. Front Setback. 30 feet required, 25'-4" proposed (may change based on right-of-way dedications).

c. Open Yard. TBD.

d. Vehicle Parking. TBD.

e. Bicycle Parking. TBD.

5. Access and Parking Design Standards

a. Public Improvements (dimensional standards). TBD.

b. Parking and Access Design. As currently designed, there are several design issues with the proposed parking configuration. All proposed parking must comply with the City's Access and Parking Design Standards and SBMC §30.175.030 Automobile Parking Requirements.

C. Historic Landmarks Commission

The project is subject to design review by the Historic Landmarks Commission (HLC) and is inconsistent with the [Historic Resources Ordinance](#) and applicable design guidelines, primarily regarding the demolition of historic resources and appropriateness of the proposed architectural style, building size, mass, bulk, height, and scale.

Please review the following for applicable guidelines:

- [HLC General Design Guidelines & Meeting Procedures](#)
- [El Pueblo Viejo Landmark District Guidelines](#)
- [Urban Design Guidelines](#)
- [Outdoor Lighting & Streetlight Design Guidelines](#)
- [Fence, Screen, Wall, and Hedge Guidelines](#)

IX. NEXT STEPS

Submit the required LLA-related fees specified in Section VI of this letter online through Accela Citizen's Access, and contact me when you have done so. This information should be submitted within 90 days of the date of this letter, pursuant to California Government Code, Section 65941.1 (d).

The project will be reviewed for consistency with applicable plans, programs, policies, ordinances, standard, requirements, and similar provisions that were adopted and in effect at the time the preliminary application was submitted on January 29, 2024. This analysis will be completed based on application materials submitted to date. We will provide you with a letter documenting our findings within 60 days of the date of this letter.

Staff will also make a determination on the appropriate level of environmental review.

X. CONCLUSIONS/GENERAL COMMENTS

Please review this letter carefully. If you feel it is necessary to meet with staff to discuss the contents of this letter or the subject project, please call me at (805) 560-7587. Staff from the Planning, Creeks, Engineering, Water Resources, Transportation, and Building & Safety Divisions and the Fire Department are generally available to meet with applicants on Tuesday afternoons on an as-needed basis. Other meeting times may also be arranged. If you have any questions, please feel free to contact me.

If you have any questions, please contact me at BBurkhart@SantaBarbaraCA.gov.

Sincerely,



Barbara Burkhardt,
Project Planner

cc: (sent via e-mail, w/o attachments)
The Mission LLC, socalindustrialequities@gmail.com
Record ID #PLN2024-00299