



CONSISTENCY REVIEW LETTER

August 29, 2025

Ben Eilenberg, The Mission LLC

Sent Via E-mail: socalindustrialequities@gmail.com

SUBJECT: 505 East Los Olivos Street, PLN2024-00299, APN: 025-150-009

Dear Mr. Eilenberg:

INTRODUCTION

The purpose of this letter is to provide the findings of the City's review of the project application for consistency with objective standards and policies that were adopted and in effect as of January 29, 2024, the date the complete preliminary application for the project was submitted. On July 3, 2025, the City deemed the formal Planning Application complete and began evaluating the project for consistency with objective standards.

PROJECT DESCRIPTION

The project proposes to demolish all existing structures and the parking lot; construct a new 270-unit for-rent residential development, with 445 automobile and 255 bicycle subterranean 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.

CONSISTENCY REVIEW

The project has been reviewed for consistency with objective standards that were adopted and in effect at the time the preliminary application was submitted on January 29, 2024. The project has been found inconsistent with multiple standards and policies for the reasons detailed in the attachments to this letter.

This consistency review was performed based on the application materials submitted to date and objective City standards; no determination has been made regarding the project's relationship to other

City standards and policies. As the project application materials are revised and new information provided, these changes may result in updates to the City's consistency review determinations.

Please be advised that should the City approve the project, prior to building permit issuance, the applicant shall comply with all City Water, Wastewater, Fire Protection, utility company, and other relevant local/state/federal agency regulations that are directly applicable to the project.

If you have any questions regarding this letter, please call me at (805) 560-7587.

Sincerely,

Barbara Burkhart
Project Planner

Attachments:

- A. Planning Division Consistency Review
- B. Transportation Division Consistency Review
- C. Engineering Division Consistency Review
- D. Water Resources Consistency Review
- E. Creeks Division Consistency Review
- F. Fire Department Consistency Review
- G. Environmental Services Consistency Review

cc: (sent via e-mail with attachments)
The Mission LLC, Ben Eilenberg; socalindustrialequities@gmail.com
Record ID # PLN2024-00299

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PLANNING DIVISION CONSISTENCY REVIEW COMMENTS

Table A.1 below evaluates the project for consistency with objective standards included in the Zoning Ordinance (Title 30 of the Santa Barbara Municipal Code (SBMC).) Please note that the analysis below is based on merging the two existing lots, as reflected in the current application. If the applicant elects to revise the proposal to include a Lot Line Adjustment, standards that may be affected are marked below with an asterisk.

Table A.1	
1. Land Use: Multi-Unit Residential is not allowed.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The project proposes 270 units where only single-unit, and limited two-unit, residential uses are allowed. <i>(SBMC TABLE §30.20.020)</i>
2. Lot Size and Street Frontage: 30,000 square feet (sf) and 90 feet, for lots with an average slope over 20% to 30%.	
Consistency Review	Consideration Factors and Notes
The project is <u>consistent</u> with this development regulation.	The existing lot (consisting of Lots 1 and 2) has an average slope of 29%. The existing lot size is 208,777 sf (4.83 acres). The street frontage along Los Olivos Road is 536.69 feet. The Conceptual Lot Line Adjustment Exhibit submitted on June 6, 2025, does not include information on the proposed average slope, or lot size, of either adjusted lot; however, it appears the adjusted Lots 1 and 2 would be consistent with Lot Size and Street Frontage standards. However, it does not appear that Adjusted Lot 2 would contain a building site that complies with the requirements of the Zoning Ordinance and the General Plan, as required by SBMC §27.02.101. <i>(SBMC TABLE §30.20.020. A; §27.02.101)</i>
3. *Maximum Base Residential Density: 1 unit per lot	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The project proposes 270 units which exceeds the 1 unit allowed. <i>(SBMC TABLE §30.20.020. A)</i>

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4. Minimum Residential Unit Size: studios 220 sf; all others 400 sf	
Consistency Review	Consideration Factors and Notes
The project is <u>consistent</u> with this development regulation.	All studio units are 360 sf or larger. All other units are 658 sf or larger. (SBMC §30.145.020)
5. Maximum Height: 30 feet	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The proposed height of 112 feet exceeds the City Charter height limit of 30 feet for areas zoned for single family residences, and exceeds the zoning limitation of 30 feet. (City Charter Section 1506; SBMC TABLE 30.20.030.A)
6. Solar Access Height Limitations.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The northernmost “wing” of the proposed building exceeds the sum of 12 feet and 58% of the shortest distance from the structure to the nearest northerly lot line. (SBMC §30.140.170)
7. *Minimum Setbacks, Residential Structures: Front 30 feet; Interior 10 feet	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The proposed building encroaches into the front setback and the southerly interior setback. <ul style="list-style-type: none"> • A portion of the building encroaches 4'-8" into the front setback, at its closest point. • A portion of the building encroaches 4'-7" into the southerly interior setback, at its closest point. (SBMC TABLE 30.20.030.A)

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- 8. Open Yards: multi-unit residential**
- ***Common Open Yard**
15% of the lot area for common areas, minimum dimensions of 10 long and 10 wide; and
 - **Private Open Yard**
 - o Located on the First Story:
 - (1) Minimum Area:
 - (a) Studio unit: 100 square feet
 - (b) 1 Bedroom unit: 120 square feet
 - (c) 2 Bedroom unit: 140 square feet
 - (d) 3 or more Bedroom unit: 160 square feet
 - (2) Minimum Dimensions: 10 feet long and 10 feet wide.
 - o Located on a Second or Higher 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.

Consistency Review	Consideration Factors and Notes
The project is <u>consistent</u> with this development regulation.	<u>Common Open Yard</u> : The common open yard standards can be met. (SBMC §30.140.140)
The project is <u>not consistent</u> with this development regulation.	<u>Private Open Yard</u> : Not all private open yards meet the minimum area and/or the minimum dimensions requirements. Please see Exhibit A for individual discrepancies. (SBMC §30.140.140)

9. Parking, Vehicle: 463 automobile parking spaces including 9 accessible and 67 guest; Parking, Bicycle: 270 long-term, meaning covered and secured.

Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	<u>Automobile</u> : The project plans depict 383 automobile parking spaces which does not meet the 463 space requirement.
The project is <u>not consistent</u> with this development regulation.	<u>Bicycle</u> : The project proposes 255 long-term bicycle parking spaces which does not meet the 270-space requirement. Furthermore, it is unclear in the plans whether the proposed spaces would be adequate to meet the long-term secure requirement (e.g., access-controlled), minimum stall dimensions, maneuvering, accessibility, or rack specifications as provided in the City’s Access and Parking Design Standards, page 17-21. (SBMC §30.175.040)

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10. Outdoor Lighting	
Consistency Review	Consideration Factors and Notes
The plans do not provide sufficient information to determine consistency.	<p>Compliance with the Outdoor Lighting & Streetlight Design Guidelines has not been demonstrated and the Outdoor Lighting Compliance Statement has not been reproduced on the plans. Compliance with said guidelines will need to be shown for consideration before the Historic Landmarks Commission.</p> <p><i>(SBMC Chapter 22.75)</i></p>
11. *Mechanical Equipment Noise: the noise limitation for mechanical equipment is 53 dB(A) at each property line of adjacent parcels used or zoned for residential, public, or semi-public uses.	
Consistency Review	Consideration Factors and Notes
The plans do not provide sufficient information to determine consistency.	<p>The decibel calculations provided on Sheet A.1.10, <i>Roof Mechanical Layout Plan w/Site Overlay</i>, do not include cumulative sound/ noise of all proposed equipment at each property line adjacent to parcels used or zoned for residential, public, or semi-public uses. Additional information is needed to assess compliance with the 53 dB(A) noise standard.</p> <p><i>(SBMC Chapter 9.16)</i></p>
12. Tree Removal. No setback tree, parking lot tree, tree on an approved plan, or tree designated as an historic or specimen tree by City Council, may be removed without a permit.	
Consistency Review	Consideration Factors and Notes
The plans do not provide sufficient information to determine consistency.	<p>The locations and species of trees proposed to be removed have not been provided. Sheet V-02, <i>Tree Inventory Map</i>, shows locations of trees and indicates those to be removed with an X; however, the trees are not numbered to correspond with the associated table that designates tree numbers and describes species and size. Furthermore, setbacks are not shown on this plan.</p> <p>No other sheet in the plan set shows trees proposed for removal, and no arborist report has been submitted to date.</p> <p><i>(SBMC §15.24.020)</i></p>

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13. Design Review Standards for El Pueblo Viejo Landmark District Overlay Zone: Spanish Colonial Revival/Mediterranean Style Required.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	<p>The building is proposed in a Contemporary architectural style. The Spanish Colonial Revival/ Mediterranean Style is required in the El Pueblo Viejo Landmark District Overlay Zone. Specifically, it is to be applied 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.</p> <p><i>(SBMC §30.57.030.B.)</i></p>

Table A.2 below evaluates the project for consistency with objective General Plan policies and implementation actions, along with other key policies for consideration. See additional analysis of General Plan, Circulation Element policy consistency in Attachment C.

Table A.2	
14. General Plan Land Use Designation: Low Density Residential (3 du/acre)	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with the General Plan land use designation.	<p>The project proposes a density of 55.9 dwelling units per acre.</p> <p><i>(General Plan Map for Inland Areas)</i></p>
15. General Plan Land Use Element. LG 6. Location of Residential Growth	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	<p>The project proposes a high-density residential development (55.9 du/acre) in a location designated for low-density residential development (3 du/acre) by the General Plan.</p>

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16. General Plan Circulation Element: Development	
C8. Emergency Routes. It shall be a high priority to keep all emergency evacuation, response and truck routes free of physical restrictions that may reduce evacuation/response times.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	<p>The project site is located within the Upper East Neighborhood, along the western side of Los Olivos Road, between the Santa Barbara Mission and the Natural History Museum sites.</p> <p>This portion of Los Olivos is a designated Wildland Evacuation Route, as mapped in Figure 9 of the City's Community Wildfire Protection Plan, and a designated Fire Engine Primary Response Route. This portion of Los Olivos is part of a constrained roadway system serving multiple locations within a high fire hazard area, including the intersections of E. Los Olivos at Alameda Padre Serra, E. Los Olivos at Mountain Drive and Mission Canyon Road at Foothill Road.</p>
17. Historic Resources Element. HR1. Protect Historic and Archaeological Resources.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	<p>The proposal does not demonstrate preservation, protection or enhancement of historic resources and archaeological resources. The project proposes demolition of two buildings listed on the City's Historic Resources Inventory, as well as significant excavation in area that includes recorded archaeological resources.</p> <p><i>(See SBMC §30.300.080 for definitions)</i></p>
18. Historic Resources Element. HR2. Ensure respectful and compatible development. HR.2.3. Assess potential damage.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	<p>The proposal does not demonstrate compatibility of development, respect for the historical context of historical resources, or consideration of sustainable design alternatives.</p> <p>The proposal does not include an assessment of construction activities in proximity to other historic resources (e.g. the Mission Santa Barbara) to ensure that damage to such resources does not occur as a result of the project.</p>

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Historic Resources Element. HR.3.3. Require project design alternatives.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	The proposal does not include preservation alternatives, such as adaptive reuse, rehabilitation, or relocation, for the existing historic resources on site; it proposes to demolish them.
19. Historic Resources Element. HR4. Pursue Adaptive Reuse.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	The proposal does not include adaptation of the existing historic buildings on site; it proposes to demolish them.
20. Historic Resources Element. HR6. Protect Traditional Public Resources and Streetscapes. HR6.1. Preserve and protect traditional public resources and streetscapes.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	<p>The proposal does not demonstrate preservation of traditional public resources or the existing streetscape, nor does it demonstrate protection of historical features and attributes of the streetscape.</p> <p>The proposal does not include measures to preserve and protect the existing historic sandstone walls on site.</p>
21. Historic Resources Element. HR7.1. Identify and designate historic cultural landscape features.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	The proposal does not include a historic survey that provides identification of historic trees, specimen trees, gardens, landscapes, streetscapes or landscape features, including those landscape features worthy of protection as part of historic designation boundaries.

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22. Conservation Element.

Visual Resources.

Policy V3.0

New development shall not obstruct scenic view corridors, including those of the ocean and lower elevations of the City viewed respectively from the shoreline and upper foothills, and of the upper foothills and mountains viewed respectively from the beach and lower elevations of the City

Environmental Resources Element

Aesthetics and Visual Resources

ER29: Visual Resources Protection. New development or redevelopment shall preserve or enhance important public views and viewpoints for public enjoyment, where such protection would not preclude reasonable development of a property.

Consistency Review	Consideration Factors and Notes
<p>The project is <u>not consistent</u> with these policies.</p>	<p>The proposal does not demonstrate preservation or enhancement of important public views or scenic view corridors. Visual simulations that demonstrate how the project would integrate into its surroundings have not been provided.</p> <p>The subject site is located within an area designated as “Visual Unique” by the City’s Master Environmental Assessment, and 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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>

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23. Safety Element. S7. Hazard Reduction. Identify, evaluate, and implement risk reduction measures during the development review and permitting process to reduce the effects of hazards to an acceptable level of risk. Project design measures shall be implemented as applicable to avoid or reduce hazards and comply with associated regulations.

Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	<p>The project site is located within the Foothill Zone High Fire Hazard Area. The portion of East Los Olivos Road that is adjacent to the project site, is a designated evacuation route and a designated Fire Engine Primary Response route. These routes exist within a constrained roadway system, including the intersections of East Los Olivos at Alameda Padre Serra, East Los Olivos at Mountain Drive and Mission Canyon Road at Foothill Road, and serve multiple locations within the high fire hazard area.</p> <p>The application materials give no indication whether design measures have been implemented to avoid or reduce hazards associated with an emergency evacuation of, or access to, the development. The project is proposed on a site located within an established residentially-zoned neighborhood; however the site is not listed on the Housing Element's Suitable Sites Inventory and is not intended for high density development.</p>

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24. Safety Element. S9. Risk Evaluation.

Proposals for new development may be required to provide an evaluation of how natural and human-caused hazards may adversely affect the project, whether the project may create or exacerbate hazards, and to identify feasible measures to reduce hazard-related risk to an acceptable level. Required hazard evaluation reports are to be prepared and signed by a qualified individual acceptable to the City. At its discretion, the City may require peer review of submitted reports.

Factors to be considered in determining whether a risk evaluation is required include but are not limited to:

- a. Location of the project in relation to City hazard maps and other hazards information
- b. Potential for the project to exacerbate natural or human-caused hazards
- c. Potential for the project to be impacted by natural and human-caused hazards
- d. Potential severity of hazard-related impacts
- e. Intended use of the site or proposed structures
- f. Potential consequences should the project be affected by one or more hazards
- g. Federal, state hazard regulations, building code requirements, and recommendations of the Geology and Geohazards Master Environmental Assessment, Technical Report and Evaluation Guidelines and other similar regulations and guidelines.

Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	No evaluation of the potential for the project to exacerbate, or be impacted by, natural or human-caused hazards has been presented, particularly in regard to the adjacent fire evacuation route along Los Olivos Road.

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25. Safety Element. S34. Evacuation Routes.

Development projects located in the Extreme Foothill and Foothill High Fire Hazard Zones shall be evaluated to determine if the project would have the potential to substantially affect emergency evacuation. A project would result in a substantial effect on evacuation if it would result in either of the following conditions:

a. Physically interfere with evacuation capabilities. A project could physically interfere with evacuation capabilities if it would reduce evacuation capacity by substantially decreasing the width of road or other access way, or result in the closure of a road or access way.

b. Add substantial additional evacuees to routes with limited capacity. A project could substantially reduce evacuation capacity if it would add a considerable amount of traffic to probable evacuation routes that do not meet current Fire Department roadway or access standards; or add a considerable amount of traffic to probable evacuation routes in relation to roadway capacity and evacuation traffic volumes reasonably expected to be generated by existing development in the project area.

Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	No evaluation of the potential of the project to affect emergency evacuation has been submitted. It is reasonable to expect that the project would generate increased traffic volumes to the existing constrained evacuation route along East Los Olivos Road/ Mission Canyon Road.

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26. Safety Element. S37. Fire Hazard Reduction Design Requirements.

Project designs shall adequately address fire hazard, providing for appropriate site layout; building design and materials; fire detection and suppression equipment; landscaping and maintenance; road access and fire vehicle turnaround; road capacity for evacuation; and water supply.

Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	<p>The application materials do not adequately address fire hazard reduction design requirements in terms of road capacity for evacuation of citizens, or emergency access for the Fire Department.</p> <p>The project proposes a high density residential development that would add considerable congestion to an already constrained evacuation route, in the event of an emergency, presenting potentially significant fire life safety hazards.</p>

27. Safety Element. S39. Defensible Space.

Require that defensible space be provided around existing and proposed development projects located in high fire hazard areas in accordance with the Wildland Fire Plan, or as recommended by the Fire Department.

Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	The application materials do not address defensible space requirements.

28. Safety Element. S40. Vegetation Management.

Vegetation management programs to reduce fire fuel loads, as well as project-related landscape and maintenance plans, shall protect and preserve environmentally sensitive habitat areas (ESHAs) and balance fire risk reduction benefits with possible aesthetic, habitat, and erosion impacts. Potential effects resulting from fuel management activities shall be avoided or reduced as feasible.

Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	The application materials do not address protection and preservation of environmentally sensitive habitat areas (ESHAs), nor the balance of fire risk reduction benefits with possible aesthetic, habitat, and erosion impacts.

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TRANSPORTATION DIVISION POLICY CONSISTENCY REVIEW COMMENTS

Table B.1 below evaluates the project for consistency with the SBMC, General Plan Circulation Element, Pedestrian Master Plan, City Access and Parking Standards, City Traffic Analysis Guidelines, and City Construction Standard Details.

Table B.1	
1. 22.44.080. 2. Public Improvement Standards (January 2024).	
Consistency Review	Consideration Factors and Notes
<p>The project is <u>not consistent</u> with this development regulation.</p>	<p>STREETS HAVING A RIGHT-OF-WAY WIDTH OF NOT LESS THAN 80 FEET AND A PAVED ROADWAY WIDTH OF NOT LESS THAN 60 FEET. Each one-half of the street shall consist of not less than 30 feet of paved section measured from the center line of pavement to the curb face, together with a parkway and sidewalk area measuring 10 feet from the curb face to the street right-of-way line with concrete sidewalks constructed within such area to the width currently required by the Zoning Ordinance (No. 3710) and the Santa Barbara Municipal Code.</p> <p>To date, the project plans have not addressed the requirement for right of way improvements per SBMC 22.44, and is therefore, not consistent with this development regulation.</p> <p>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.</p> <p>Note that streetlights are also required and have not been shown on the plans.</p> <p>The right of way improvements shall be provided by a licensed civil engineer with the base sheet being 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.</p>

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2. Sight Visibility at Driveways (SBMC Section 30.140.230)	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The visibility triangles have not been provided. First step is showing the right of way improvements. 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.
3. Access and Parking Standards: Vehicle and Bike Standards and Access	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	<p>The project has not made any effort to demonstrate compliance with the City's Access and Parking Design Standards. The standards are attached and below are the items requiring compliance to be shown on the project plans. Provide staff with a hard copy plan set so staff can confirm maneuverability.</p> <ul style="list-style-type: none"> • Minimum staff dimensions • Minimum bay dimensions • Vertical elements • On site loading • Maneuvering • Vehicle overhangs • Driveway width • Driveway aprons • Driveway length • Vehicle ramps • Vertical curves • Gates • Visibility • Driveway materials • Driveway throat • Bicycle parking <p>Compliance with the above items are also detailed in the LDT Application Response letters.</p>

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4. Onsite Truck Service Lane and Backing into the Public Right of Way	
Consistency Review	Consideration Factors and Notes
<p>The project is <u>not consistent</u> with this development regulation.</p>	<p>Relocate the “truck service lane” that is shown to the southwest 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.</p> <p>(SBMC §30.175.090a):</p> <p>“Parking lots shall be designed so that sanitation, emergency, and other public service vehicles can provide service without backing out or making other dangerous or hazardous turning movements.</p> <p>Backing out onto a public street or sidewalk from a parking space shall be permitted only for Single-Unit and Two-Unit Residential, and where not more than four parking spaces are provided.”</p>
5. Traffic Management Strategy (Resolution No. 20-042)	
Consistency Review	Consideration Factors and Notes
<p>The project is <u>not consistent</u> with this development regulation.</p>	<p>Transportation staff performed a preliminary trip generation and distribution analysis for the proposed project of 270 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 162.49 and a PM PHT rate of 154.1 trips for the 270 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 156.35 AM PHT and 145.76 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. Please note that the Traffic Management Strategy focuses on limiting nonresidential development, in order to utilize the City’s existing transportation capacity efficiently and to prioritize constrained transportation capacity for high priority land uses. Although residential development is broadly supported as a priority land use, and is particularly encouraged in certain areas with higher densities consistent with the City’s density incentive programs, the subject project is not located in one of these areas as the subject site is intentionally zoned for low density residential use. Providing public improvements and adequate on-site bicycle parking will help to offset some of the traffic congestion. Other recommended measures are on-site carshare.</p>

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6. Circulation Element: Accessibility (Policy C9)	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	<p>From a transportation perspective, the project has not provided any public right of way improvements or path connections from the right of way to the property. On site parking has not demonstrated compliance with ADA.</p> <p>“Make universal accessibility for persons with disabilities, seniors, and other special needs populations a priority in the construction of all new development for both public and private projects.”</p>
7. Circulation Element: Alternative Transportation/Economic Vitality (CE1.1.3 and CE5.1.2)	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this policy.	<p>The subject site is adjacent or in the vicinity of Santa Barbara Mission/Mission Park (Rose Garden), Rocky Nook Park, Women’s Club, Santa Barbara Natural History Museum and Roosevelt Elementary School. The project does not provide any public improvements to connect the proposed development to these existing features, which is highly problematic and forces all residents to have trips by vehicle.</p> <p>“Enhance alternative transportation services and infrastructure access between residential, recreational, educational, institutional and commercial areas.”</p> <p>“Identify and link major activity centers and destinations with walkways. This will consist of the following:... improving pedestrian access in and around the Mission by providing safe and attractive walking connections between the Mission, Rose Garden, Rocky Nook Park, Natural History Museum and Alameda Padre Serra.”</p>

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8. Traffic Operations and Emergency Access Assessment (Caltrans Policy 13-02) and CEQA Initial Study Checklist	
Consistency Review	Consideration Factors and Notes
<p>The project is <u>not consistent</u> with this development regulation.</p>	<p>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</p> <p>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.</p>
9. Pedestrian Master Plan (Policy 1.7) Sidewalk facilities shall be maintained, protected, and improved, on an ongoing basis, during private construction projects.	
Pedestrian Master Plan: Principles for Pedestrian Design (Guidelines for Sidewalk Corridors; Strategy 4.1.2) and Sidewalk Guidelines (Table V111-2)	
Consistency Review	Consideration Factors and Notes
<p>The project is <u>not consistent</u> with this policy.</p>	<p>The application materials do not address maintenance, protection, or improvements of sidewalk facilities.</p> <p>Recommended minimums for walkways along local service streets where ROW is 50 feet or greater.</p> <div style="text-align: right;"> <p>The diagram shows a cross-section of a sidewalk adjacent to a road. From left to right, it identifies four zones: the Curb Zone (0'-6" wide), the Furnishings Zone (4' wide), the Through Pedestrian Zone (6' wide), and the Frontage Zone (6" wide). A car is shown on the road, a tree is in the Furnishings Zone, and two people are walking in the Through Pedestrian Zone. A building and a trash can are shown in the Frontage Zone.</p> </div>

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10. Bicycle Master Plan: Bikeway System (4.2.6)	
Consistency Review	Consideration Factors and Notes
<p>The project is <u>not consistent</u> with this development regulation.</p>	<p>Increase attractive, convenient, and secure bike parking and storage facilities on public property and encourage the provision of the same on private property. Continue to consider fully enclosed individual lockers and/or bicycle racks.</p> <p>While some bike parking is proposed, the applicant has yet to address compliance with the City’s Access and Parking Standards as described in detail in the 30-day incompleteness letters. The number of bicycle parking provided does not meet the residential demand nor does the parking accommodate different styles of bicycles.</p>
11. Vehicle Miles Traveled	
Consistency Review	Consideration Factors and Notes
<p>The project is <u>not consistent</u> with this development regulation.</p>	<p>Per the City’s Master Environmental Assessment Guidelines for Transportation Analysis, the proposed project would result in 1,819 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.</p>

ATTACHMENT C

ENGINEERING DIVISION POLICY CONSISTENCY REVIEW COMMENTS

Table C.1 below evaluates the project for consistency with SBMC Titles 14 (Water and Sewers) and 22 (Environmental Policy and Construction).

Table C.1	
1. City Utility Infrastructure Requirements.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	<i>Water Supply and Sewer Disposal Connections to City Infrastructure Systems.</i> Existing and Proposed Connections to City Water and Sewer infrastructure shall at a minimum comply with SBMC Title 14, Water and Sewers, and be clearly shown and identified on all plan sets. (SBMC §14.08.010 & §14.44.010)
2. Street Improvement Requirements.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	<i>Improvements to City Streets.</i> All Improvements to City Streets shall at a minimum comply with SBMC Title 22, Environmental Policy and Construction, and be clearly shown and identified on all plan sets. (SBMC §22.44)
3. Utility Requirements.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	<i>Utilities within the Public Right-of-Way serving the project Parcel(s).</i> All Existing and Proposed Utilities to serve the project Parcel(s) shall at a minimum be in compliance with SBMC Title 22 and be clearly shown and identified on all plan sets. (SBMC §22.38)

ATTACHMENT D

WATER RESOURCES DIVISION POLICY CONSISTENCY REVIEW COMMENTS

Water Supply/Distribution

Table D.1 below evaluates the project for consistency with Santa Barbara Municipal Code Title 14 (Water and Sewers) and the standard specifications for capital projects referenced below.

Table D.1	
1. Utility Plans	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The plans do not include comprehensive utility, plumbing, or civil sheets and do not clearly show all existing and/ or new sewer service laterals. The plans do not clarify whether existing meters/ services would be abandoned or reclassified.
2. Water Model	
Consistency Review	Consideration Factors and Notes
The plans do not provide sufficient information to determine consistency.	<p>The application materials do not demonstrate whether the project would impact the public water system or nearby neighborhoods. The following information, required for the City to run a water model, has not been provided.</p> <ul style="list-style-type: none"> • Domestic demand • Fixture unit calculations • Landscape irrigation demand • Fire flow requirements • Sizes/quantities of requested water services • Civil plan showing project location, City water mains, and all connection points <p>(SBMC 14.08. / AWWA M32, M31 / CA Water Code 10910)</p>
3. Meter and Private Water Main Requirements	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	<p>The application materials do not address the issue of insufficient space in the public right-of-way to locate all required residential meters. A residential master meter shall be installed in the public right-of-way in accordance with City Standard Detail W-5.6. To meet residential demand, two (2) master meters from separate water mains may be required, in addition to the irrigation and fire service lines.</p> <p>A private fire service to supply the on-site fire hydrant shall be designed in compliance with City Standard Details W-.1.0, W-1.1, and W-5.6.</p> <p>(SBMC 14.08 / 14.21)</p>

ATTACHMENT D

4. Protecting City Water Infrastructure	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	<p>The application materials do not demonstrate how water infrastructure would be protected from damage during construction and landscaping, nor do they demonstrate sufficient clearance to prevent future damage. The plans do not clearly identify measures to:</p> <ul style="list-style-type: none">• Prevent grading or drainage changes on the project site from impacting the City's water reservoir.• Protect existing water infrastructure during and after construction.• Avoid planting large trees along the shared property line with the water reservoir. Tree roots that encroach on or penetrate reservoir walls must be removed at the property owner's expense. Any damage to the reservoir caused by construction or site improvements must be repaired by the property owner at their expense. <p>(SBMC §22.21.010 and §14.20.050)</p>
5. Advisory Comments	
<p>Cross Connection Inspections: To comply with the State of California's adopted Cross Connection Policy Handbook and the City's Cross Connection Control Program, be advised that a hazard assessment or cross-connection survey is required. The type of inspection shall depend upon your project's complexity and shall determine the need for backflow protection. These backflow inspections are to be completed prior to project building permit Final.</p> <p>Backflow Requirements: 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. (SBMC §14.21.070.D)</p>	

ATTACHMENT E

CREEKS DIVISION POLICY CONSISTENCY REVIEW COMMENTS

Table E.1 below evaluates the project for consistency with Santa Barbara Municipal Code Chapter 22.87 and the City's Storm Water BMP Guidance Manual.

Table E.1	
1. Storm Water Management Program Requirements	
Consistency Review	Consideration Factors and Notes
The submitted plans and storm water report do not provide sufficient information to determine consistency.	The plans and storm water report do not demonstrate compliance with the City's Tier 4 Storm Water Management Program (SWMP) requirements and must do so before Design Review Final Approval. <i>(SBMC Chapter 22.87 and the City's Storm Water BMP Guidance Manual)</i>

Table E.2 below evaluates the project for consistency with Santa Barbara Municipal Code §30.140.050 and §30.15.040

Table E.2	
1. Development Along Mission Creek and Determining Creek Top of Bank	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The proposed development encroaches into the Mission Creek development limitation area. The plans do not demonstrate compliance with the City's ordinances regarding development along Mission Creek and top of bank determination. <i>(SBMC §30.140.050 and §30.15.040)</i>

ATTACHMENT F

FIRE DEPARTMENT POLICY CONSISTENCY REVIEW COMMENTS

Table F.1 below evaluates the project for consistency with Santa Barbara Municipal Code Title 8 (Fire Protection), the 2021 International Fire Code, and the 2022 California Fire Code.

Table F.1	
1. Emergency Access.	
Consistency Review	Consideration Factors and Notes
The plans do not provide sufficient information to determine consistency with this regulation.	The project plans do not demonstrate that suitable access for emergency vehicles would be provided, including appropriate slope, all-weather surface, turnaround, and maneuvering. <i>(SBMC §8.04.020)</i>
2. Community Wildfire Protection Plan. Policy 7. Increase evacuation safety for residents and the general public in High Fire Hazard Areas	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The project proposes a high density residential development that would add considerable congestion to an already constrained evacuation route, in the event of an emergency, presenting significant fire life safety hazards.
3. Community Wildfire Protection Plan. Policy 8. Reduce fire engine response times in all High Fire Hazard Areas to 4 minutes.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The project would increase fire engine response times in a High Fire Hazard Area. The project proposes a high density residential development that would add considerable response time for emergency services to an already constrained roadway system serving multiple locations within the high fire hazard area. This includes the intersections of E. Los Olivos at Alameda Padre Serra, E. Los Olivos at Mountain Drive and Mission Canyon Road at Foothill Road.

ATTACHMENT F

4. Roofing Containing Vegetation. Vegetated roofs shall not be used in the Wildland-Urban Interface (WUI) Fire Area and are prohibited in High Fire Hazard Areas.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The project proposes green roof areas on Floors 2 through 8. The project site is located within an area mapped by CAL FIRE as a WUI Fire Area, and by the City of Santa Barbara as a High Fire Hazard Area. <i>(SBMC §§8.04.020, 22.04.025; CAL FIRE WUI Map)</i>

5. High Fire Hazard Area Landscape.	
Consistency Review	Consideration Factors and Notes
The project is <u>not consistent</u> with this development regulation.	The application materials do not demonstrate that the proposed landscaping meets the High Fire Hazard Area Defensible Space Requirements outlined in the City of Santa Barbara Community Wildfire Protection Plan. All landscape plant species must be fire resistant as described in the CWPP High Fire Hazard Area Landscape Requirements. Applications for new developments in the High Fire Hazard Area must submit Landscape Plans for review by the fire code official. <i>(Ord. 5920; SBMC §8.04.020.R)</i>

ATTACHMENT G

ENVIRONMENTAL SERVICES DIVISION POLICY CONSISTENCY REVIEW COMMENTS

Table G.1 below evaluates the project for consistency with objective provisions of the SBMC §30.140.240 Waste, Recycling, and Outdoor Storage.

1. Enclosure Design, Trash Truck Access Point (TAP)	
Consistency Review	Consideration Factors and Notes
<p>The project is <u>not consistent</u> with this development regulation.</p>	<p>Dumpsters and trash chutes are proposed in sub-level 1-4. The waste hauler does not have sufficient height clearance (16 feet at entrance/exit points, 20 feet at location of bin) to enter the parking garage sub-levels where the dumpsters are located, as currently proposed. The proposed dumpsters would need to be pulled to the street by hand and as such would be subject to the 2% slope limit and 50-foot path distance limit for path of travel from the enclosure to Truck Access Point (TAP). The site plan does not indicate where the TAP would be or show a path of travel of the containers to the TAP.</p> <ul style="list-style-type: none"> • Maximum distance from the TAP: The enclosure should be located no more than 50 feet from the TAP. • Maximum slope: Slope from enclosure to the TAP must not exceed 2% when dumpsters are used. • Overhead clearance: Allow for overhead clearance of 20' where bin is serviced. • Hauler truck access cannot require the truck to back around curves. <p><i>(SBMC §30.140.240)</i></p>

Unit Number (Floor Plan Data)	Bedrooms	Patio/ Balcony SF & min dims	Requirement Square-Feet and Minimum Dimensions	Consistency
100	0	no patio or balcony	100 sf (10' x 10')	Not Consistent
101	0	no patio or balcony	100 sf (10' x 10')	Not Consistent
102	0	no patio or balcony	100 sf (10' x 10')	Not Consistent
103	0	no patio or balcony	100 sf (10' x 10')	Not Consistent
104	0	no patio or balcony	100 sf (10' x 10')	Not Consistent
105	0	no patio or balcony	100 sf (10' x 10')	Not Consistent
106	0	no patio or balcony	100 sf (10' x 10')	Not Consistent
107	1	SF & min dims not provided	120 sf (10' x 10')	Insufficient Information Provided
108	1	SF & min dims not provided	120 sf (10' x 10')	Insufficient Information Provided
109	1	SF & min dims not provided	120 sf (10' x 10')	Insufficient Information Provided
110	2	SF & min dims not provided	140 sf (10' x 10')	Insufficient Information Provided
111	1	SF & min dims not provided	120 sf (10' x 10')	Insufficient Information Provided
112	1	SF & min dims not provided	120 sf (10' x 10')	Insufficient Information Provided
113	1	SF & min dims not provided	120 sf (10' x 10')	Insufficient Information Provided
114	2	SF & min dims not provided	140 sf (10' x 10')	Insufficient Information Provided
145	3	SF & min dims not provided	160 sf (10' x 10')	Insufficient Information Provided
146	3	SF & min dims not provided	160 sf (10' x 10')	Insufficient Information Provided

Unit Number (Floor Plan Data)	Bedrooms	Proposed Patio/ Balcony SF & min dims	Required Patio/ Balcony SF & min dims	Consistency
"215"	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
201	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
202	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
203	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
204	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
205	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
206	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
207	1	72 sf (12' x 6')	72 sf (6' x 6')	Consistent
208	1	72 sf (12' x 6')	72 sf (6' x 6')	Consistent
209	1	72 sf (12' x 6')	72 sf (6' x 6')	Consistent
210	2	84 sf (12' x 7')	84 sf (6' x 6')	Consistent
211	1	72 sf (12' x 6')	72 sf (6' x 6')	Consistent
212	1	72 sf (12' x 6')	72 sf (6' x 6')	Consistent
213	1	72 sf (12' x 6')	72 sf (6' x 6')	Consistent
214	2	84 sf (14' x 6')	84 sf (6' x 6')	Consistent
215	1	124 sf (14'-10" x 7'-5")	72 sf (6' x 6')	Consistent
220	1	~98 sf (12' x 8'-2 5/8")	72 sf (6' x 6')	Consistent
221	3	private yard ~68 sf (18'-8" x 3'-8")	96 sf (6' x 6')	Consistent
		deck ~94 sf (16'-7 1/2" x 5'-8")		
222	3	100 sf (10' x 10')	96 sf (6' x 6')	Consistent
223	1	72 sf (12' x 6')	72 sf (6' x 6')	Consistent
224	2	84 sf (12' x 7')	84 sf (6' x 6')	Consistent
225	1	72 sf (12' x 6')	72 sf (6' x 6')	Consistent
226	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
227	2	84 sf (12' x 7')	84 sf (6' x 6')	Consistent
228	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
229	3	100 sf (10' x 10')	96 sf (6' x 6')	Consistent
		235 sf (29'-7" x 6'-0")		
230	2	147 sf (15'-2" x 7'-9")	84 sf (6' x 6')	Consistent
		private yard, no data		
231	0	~ 123 sf (17'-8" x 7'-0")	60 sf (6' x 6')	Consistent
245	3	322 sf (34'-2" x 4'-5 3/8")	96 sf (6' x 6')	Consistent
246	3	297 sf (28'-4 1/2" x 17'-9 1/2")	96 sf (6' x 6')	Consistent

Unit Number (Floor Plan Data)	Bedrooms	Proposed Patio/ Balcony SF & min dims	Required Patio/ Balcony SF & min dims	Consistency
300	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
301	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
302	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
303	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
304	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
305	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
306	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
307	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
308	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
309	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
310	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
311	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
312	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
313	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
314	2	84 sf (14' x 6')	84 sf (12' x 7')	Not Consistent
315	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
316	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
317	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
318	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
319	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
320	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
321	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
322	3	96 sf (16' x 6")	96 sf (6' x 6')	Consistent
323	3	100 sf (10' x 10')	96 sf (6' x 6')	Consistent
324	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
325	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
326	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
327	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
328	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
329	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
330	3	100 sf (10' x 10')	96 sf (6' x 6')	Consistent
		235 sf (29'-7" x 6')		
331	2	147 sf (15'-2" x 10'-9")	84 sf (12' x 7')	Consistent
332	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
338	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
339	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
340	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
341	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
342	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
343	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
344	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
345	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
345	3	322 sf (34'-2" x 14' & 4'-5 3/8")	96 sf (6' x 6')	Consistent
346	3	297 sf (28'-4 1/2" x 17'-9 1/2")	96 sf (6' x 6')	Consistent

Unit Number (Floor Plan Data)	Bedrooms	Proposed Patio/ Balcony SF & min dims	Required Patio/ Balcony SF & min dims	Consistency
401	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
402	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
403	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
404	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
405	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
406	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
407	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
408	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
409	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
410	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
411	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
412	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
413	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
414	2	84 sf (14' x 6')	84 sf (12' x 7')	Not Consistent
415	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
416	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
417	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
418	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
419	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
420	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
421	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
422	3	96 sf (16' x 6')	96 sf (6' x 6')	Consistent
423	3	100 sf (10' x 10')	96 sf (6' x 6')	Consistent
424	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
425	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
426	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
427	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
428	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
429	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
430	3	100 sf (10' x 10')	96 sf (6' x 6')	Consistent
		235 sf (29'-7" x 6')		
431	2	147 sf (15'-2" x 10'-9")	84 sf (12' x 7')	Consistent
432	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
433	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
434	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
435	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
436	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
437	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
438	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
439	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
440	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
441	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
442	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
443	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
444	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
445	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
445	3	72 sf (12' x 6')	96 sf (6' x 6')	Consistent
		322 sf (34'-2 1/8" x 14')		
unnumbered	3	297 sf (28'-4 1/2" x 17'-9 1/2")	96 sf (6' x 6')	Consistent

Unit Number (Floor Plan Data)	Bedrooms	Proposed Patio/ Balcony SF & min dims	Required Patio/ Balcony SF & min dims	Consistency
501	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
502	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
503	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
504	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
505	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
507	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
508	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
509	0	72 sf (12' x 6')	60 sf (6' x 6')	Consistent
510	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
511	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
512	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
513	2	84 sf (14' x 6')	84 sf (12' x 7')	Not Consistent
514	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
515	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
516	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
517	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
518	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
519	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
520	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
521	3	96 sf (16' x 6')	96 sf (6' x 6')	Consistent
"622"	3	100 sf (10' x 10')	96 sf (6' x 6')	Consistent
523	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
524	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
525	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
526	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
527	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
528	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
529	3	100 sf (10' x 10')	96 sf (6' x 6')	Consistent
		235 sf (29'-7" x 6')		
530	2	147 sf (15'-2" x 10'-9")	84 sf (12' x 7')	Consistent
531	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
532	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
533	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
534	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
535	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
536	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
537	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
538	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
539	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
540	0	72 sf (12' x 6')	60 sf (6' x 6')	Consistent
541	0	none	60 sf (6' x 6')	Not Consistent
542	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
543	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
545	3	72 sf (12' x 6')	96 sf (6' x 6')	Consistent
		322 sf (33'-7 3/4" x 4'-6")		
546	3	100 (10' x 10')	96 sf (6' x 6')	Consistent
		297 sf (28' x 2 5/8")		

Unit Number (Floor Plan Data)	Bedrooms	Proposed Patio/ Balcony SF & min dims		Required Patio/ Balcony SF & min dims	Consistency
601	1	72 sf (12' x 6')		72 sf (12' x 6')	Consistent
602	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
603	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
604	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
605	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
607	1	72 sf (12' x 6')		72 sf (12' x 6')	Consistent
610	2	84 sf (12' x 7')		84 sf (12' x 7')	Consistent
611	1	72 sf (12' x 6')		72 sf (12' x 6')	Consistent
612	3	96 sf (12' x 8')		96 sf (6' x 6')	Consistent
613	2	84 sf (14' x 6')		84 sf (12' x 7')	Not Consistent
614	3	96 sf (12' x 8')		96 sf (6' x 6')	Consistent
615	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
616	1	72 sf (12' x 6')		72 sf (12' x 6')	Consistent
617	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
618	2	84 sf (12' x 7')		84 sf (12' x 7')	Consistent
619	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
620	1	94 sf (15' x 6')		72 sf (12' x 6')	Consistent
621	3	96 sf (16' x 6')		96 sf (6' x 6')	Consistent
622	3	100 sf (10' x 10')		96 sf (6' x 6')	Consistent
623	1	72 sf (12' x 6')		72 sf (12' x 6')	Consistent
624	2	84 sf (12' x 7')		84 sf (12' x 7')	Consistent
625	1	72 sf (12' x 6')		72 sf (12' x 6')	Consistent
626	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
627	2	84 sf (12' x 7')		84 sf (12' x 7')	Consistent
628	3	80 sf (10' x 8')	1,042 sf shared	96 sf (6' x 6')	Consistent
629	2	84 sf (12' x 7')	(69'-1 3/8" x 9'x 3")	84 sf (12' x 7')	Consistent
630	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
631	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
632	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
633	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
634	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
635	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
636	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
637	2	84 sf (12' x 7')		84 sf (12' x 7')	Consistent
638	1	72 sf (12' x 6')		72 sf (12' x 6')	Consistent
639	0	60 sf (10' x 6')		60 sf (6' x 6')	Consistent
640	1	72 sf (12' x 6')		72 sf (12' x 6')	Consistent
		72 sf (12' x 6')			
645	3	305 sf (33'-9 1/4" x 4' x 6") 100 sf (10' x 10')		96 sf (6' x 6')	Consistent
646	3	297 sf (28'-1 1/8" x 5')		96 sf (6' x 6')	Consistent

Unit Number (Floor Plan Data)	Bedrooms	Proposed Patio/ Balcony SF & min dims	Required Patio/ Balcony SF & min dims	Consistency
701	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
702	0	60 sf (10' x 6")	60 sf (6' x 6')	Consistent
703	0	60 sf (10' x 6")	60 sf (6' x 6')	Consistent
704	0	60 sf (10' x 6")	60 sf (6' x 6')	Consistent
705	0	60 sf (10' x 6")	60 sf (6' x 6')	Consistent
707	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
710	2	84 sf (12' x 7")	84 sf (12' x 7')	Consistent
711	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
712	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
713	2	84 sf (14' x 6')	84 sf (12' x 7')	Not Consistent
714	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
715	0	60 sf (12' x 6')	60 sf (6' x 6')	Consistent
716	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
717	0	60 sf (12' x 6')	60 sf (6' x 6')	Consistent
718	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
719	0	60 sf (12' x 6')	60 sf (6' x 6')	Consistent
		200 sf (24'-0 3/8" x 10'-8 3/4")		
722	3	370 sf (59'-3 5/8" x 13'-1 1/2")	96 sf (6' x 6')	Consistent
723	1	72sf (12' x 6')	72 sf (12' x 6')	Consistent
724	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
725	1	72 sf (12' x 7')	72 sf (12' x 6')	Consistent
726	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
727	1	72sf (12' x 6')	72 sf (12' x 6')	Consistent
729	3	1,505 sf (71'-4 1/8" x 26'-3 3/8")	96 sf (6' x 6')	Consistent
732	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
733	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
734	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
735	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
736	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
737	2	60 sf (10' x 6')	84 sf (12' x 7')	Not Consistent
738	0	72sf (12' x 6')	60 sf (6' x 6')	Consistent
739	0	60 sf (10' x 6')	60 sf (6' x 6')	Consistent
740	1	72sf (12' x 6')	72 sf (12' x 6')	Consistent
745	3	474 sf (39'-2 5/8" x 6'-11")	96 sf (6' x 6')	Consistent

Unit Number (Floor Plan Data)	Bedrooms	Proposed Patio/ Balcony SF & min dims	Required Patio/ Balcony SF & min dims	Consistency
801	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
803	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
810	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
811	1	72 sf (12' x 6')	72 sf (12' x 6')	Consistent
812	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
813	2	84 sf (14' x 6')	84 sf (12' x 7')	Not Consistent
814	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
816	2	84 sf (12' x 7')	84 sf (12' x 7')	Consistent
818	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
819	1	73 sf (10'-6" x 7')	72 sf (12' x 6')	Not Consistent
822	3	460 sf (52'-6" x 9')	96 sf (6' x 6')	Consistent
825	3	280 sf (20' x 14')	96 sf (6' x 6')	Consistent
829	3	1,141 sf (23'-9 3/4" x 18'-1")	96 sf (6' x 6')	Consistent
834	3	280 sf (20' x 14')	96 sf (6' x 6')	Consistent
837	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
840	3	96 sf (12' x 8')	96 sf (6' x 6')	Consistent
845	3	1,565 sf (73'-7 3/8" x 31'-5 1/2")	96 sf (6' x 6')	Consistent