Sarah Mayer Public Comment - Lozeau Drury

LATE DIST

#1

From:	PAD LRP Housing Element
Sent:	Thursday, April 25, 2024 10:38 AM
To:	sbcob
Subject:	FW: Lozeau Drury Corrected Comment Regarding Program Environmental Impact Report for the County of Santa Barbara 2023-2031 Housing Element Update - Case No. 23EIR-00000-00004
Attachments:	2024.04.23 Corrected Lozeau Drury and T. Brohard EIR Comment Glen Annie - Final.pdf

From: Michael Lozeau <michael@lozeaudrury.com>
Sent: Tuesday, April 23, 2024 4:59 PM
To: PAD LRP Housing Element <housingelement@countyofsb.org>
Subject: Lozeau Drury Corrected Comment Regarding Program Environmental Impact Report for the County of Santa Barbara 2023-2031 Housing Element Update - Case No. 23EIR-00000-00004

Dear Ms. Thomas,

Attached please find a correction to Lozeau Drury LLP's previously submitted comments on behalf Glen Annie Canyon Ranch and Glen Annie Organics regarding the Program Environmental Impact Report for the County of Santa Barbara 2023-2031 Housing Element Update - Case No. 23EIR-00000-00004. Please include these comments in the materials to be forwarded to the Board of Supervisors for the rezoning project. If you could please confirm receipt would be appreciated.

Thank you for considering these comments.

Sincerely,

Michael R. Lozeau
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April 23, 2024

Via E-mail

Hannah Thomas
County of Santa Barbara
Planning and Development
123 E. Anapamu Street
Santa Barbara, CA 93101
housingelement@countyofsb.org

Re: Corrected Comment Regarding Program Environmental Impact Report for the County of Santa Barbara 2023-2031 Housing Element Update - Case No. 23EIR-00000-00004

Dear Ms. Thomas,

On February 9, 2024, on behalf of Glen Annie Canyon Ranch and Glen Annie Organics, my office submitted comments on the Draft Program Environmental Impact Report ("DEIR") for the 2023-2031 Housing Element Update for County of Santa Barbara (State Clearinghouse No. 2022070490) ("Project"). In reviewing our submittal, I noticed that Exhibit C to the comments setting forth comments regarding VMT calculations for the Glen Annie site by Traffic Engineer Tom Brohard, PE, was not the final version of his comments. Attached please find the final version of Mr. Brohard's comments along with his attachment. Please provide Mr. Brohard's comment to the Board of Supervisors and include it in the administrative record for the EIR and the upcoming rezoning decision. Of particular note is Mr. Brohard's closing paragraph which indicates that, based on the County consultant's estimate of VMT percentage reductions for transit-oriented development, "eliminating [the Glen Annie Golf Course] from rezoning and locating the same residential housing in existing urban areas in the South County would alone reduce the resulting VMT by 54,763 vehicle miles traveled."

Thank you for your attention to these comments.

Sincerely,

Michael R. Lozeau

Michael R. Lozeau

Encl.

ATTACHMENT

Tom Brohard and Associates

January 26, 2024

Mr. Michael Lozeau, Esq.
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, California 94612

SUBJECT: Santa Barbara Housing Element – VMT Calculations for Glen Annie Golf Course Site

Dear Mr. Lozeau:

As you requested, I have reviewed portions of the Santa Barbara County Housing Element Environmental Impact Report (EIR) including the project description, alternatives and transportation chapters. I have also reviewed the accompanying appendices from the EIR as well as details regarding the Glen Annie Golf Course site identified in the Board of Supervisors Action Letter from their meeting on August 17, 1993.

The Glen Annie Golf Course site was approved under a Conditional Use Permit and included an 18-hole golf course operating 360 days a year. The site included a putting course, driving range, and clubhouse with restaurant and meeting areas for special events such as weddings. Daily usage was forecast at 390 people on weekdays and 510 people on weekend days, with about 160,000 customers using the facility annually.

Alternatives 2 and 4 in the Housing Element EIR both propose eliminating the Glen Annie golf course (and other areas) from the housing rezoning (see transportation discussion of Alternative 2 on Pages 4-38-4-40, and transportation discussion of Alternative 4 on Pages 4-56-4-58). Page 4-26 of the EIR indicates: "Specifically, the following potential rezone sites considered under the proposed Project would be eliminated based on: 1) their location along the urban/rural boundary; 2) because they are not located within an HQTC; or 3) are otherwise located away from jobs/services within the county."

Table B in the EIR, the Rezone Sites Inventory Buildout, shows the Glen Annie Golf Course as 94.7 acres in size. It assumed that 2,600 multi-family units and 73 single family residences could be built on the Glen Annie golf course site, 2,673 housing units in total. To forecast vehicle trips associated with the reuse as well as for the existing Glen Annie Golf Course, I have applied the average vehicle trip rates published in the Institute of Transportation Engineers Trip Generation Manual 11th Edition to calculate weekday daily trips for the different land uses (see enclosures). I also used Table 2 on Page 9 from the November 2023 Vehicle Miles Traveled Impact Analysis Report by Fehr & Peers for trip lengths to calculate VMT as follows:

81905 Mountain View Lane, La Quinta, California 92253-7611
Phone (760) 398-8885
Email tbrohard0@gmail.com

Mr. Michael Lozeau, Esq.
Santa Barbara Housing Element – VMT Calculations for Glen Annie Golf Course Site
January 26, 2024

Proposed Residential Reuse VMT

- 2,600 multi-family units times 6.74 weekday daily trips = 17,524 weekday daily trips
- 73 single family homes times 9.43 weekday daily trips = 688 weekday daily trips
- Total weekday daily trips = 18,212 weekday daily trips
- Average trip length = 9.7 miles
- Reuse VMT = 18,212 weekday daily trips times 9.7 miles average trip length = 176,656 vehicle miles traveled

Calculated Golf Course VMT

- 18 holes times 30.38 weekday average trips per hole = 547 weekday daily trips for golfers
- Average trip length = 9.7 miles
- Golf course VMT = 547 weekday daily VMT times 9.7 miles = 5,306 vehicle miles traveled
- Golf Course Service Population = 16 employees times 39.5 vehicle miles traveled = 632 vehicle miles traveled
- Golf Course VMT = 5,306 for golfers plus 632 for employees = 5,938 vehicle miles traveled for golf course

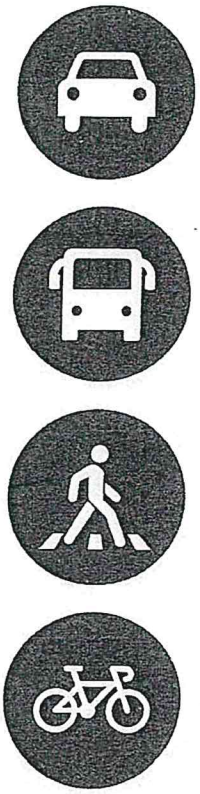
The proposed residential reuse results in 176,656 vehicle miles traveled compared to 5,938 vehicle miles traveled calculated for the 18-hole golf course. In addition to the increased transportation impacts with the development of 2,273 residential units on the Glen Annie Golf Course site, other significant impacts would also occur in air quality and greenhouse gas emissions.

Table 8 on Page 20 from the November 2023 Vehicle Miles Traveled Impact Analysis Report by Fehr & Peers provides VMT reductions of up to 31% for transit-oriented development. Applying that figure to analyzing the traffic impacts of the rezoning proposed for the Glen Annie Golf Course demonstrates that eliminating this site from rezoning and locating the same residential housing in existing urban areas in the South County would alone reduce the resulting VMT by 54,763 vehicle miles traveled.

Respectfully submitted,

Tom Brohard and Associates

Tom Brohard, PE
Principal



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A Community of Transportation Professionals

Trip Generation Manual

11th Edition • Volume 3

General Urban/Suburban and Rural (Land Uses 000–399)

Institute of Transportation Engineers
September 2021

Land Use: 210
Single-Family Detached Housing

Description

A single-family detached housing site includes any single-family detached home on an individual lot. A typical site surveyed is a suburban subdivision.

Specialized Land Use

Data have been submitted for several single-family detached housing developments with homes that are commonly referred to as patio homes. A patio home is a detached housing unit that is located on a small lot with little (or no) front or back yard. In some subdivisions, communal maintenance of outside grounds is provided for the patio homes. The three patio home sites total 299 dwelling units with overall weighted average trip generation rates of 5.35 vehicle trips per dwelling unit for weekday, 0.26 for the AM adjacent street peak hour, and 0.47 for the PM adjacent street peak hour. These patio home rates based on a small sample of sites are lower than those for single-family detached housing (Land Use 210), lower than those for single-family attached housing (Land Use 251), and higher than those for senior adult housing -- single-family (Land Use 251). Further analysis of this housing type will be conducted in a future edition of *Trip Generation Manual*.

Additional Data

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (https://www.ite.org/technical-resources/topics/trip-and-parking-generation/).

For 30 of the study sites, data on the number of residents and number of household vehicles are available. The overall averages for the 30 sites are 3.6 residents per dwelling unit and 1.5 vehicles per dwelling unit.

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in Arizona, California, Connecticut, Delaware, Illinois, Indiana, Kentucky, Maryland, Massachusetts, Minnesota, Montana, New Jersey, North Carolina, Ohio, Ontario (CAN), Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Vermont, Virginia, and West Virginia.

Source Numbers

100, 105, 114, 126, 157, 167, 177, 197, 207, 211, 217, 267, 275, 293, 300, 319, 320, 356, 357, 367, 384, 387, 407, 435, 522, 550, 552, 579, 598, 601, 603, 614, 637, 711, 716, 720, 728, 735, 868, 869, 903, 925, 936, 1005, 1007, 1008, 1010, 1033, 1066, 1077,1078, 1079

Single-Family Detached Housing
(210)

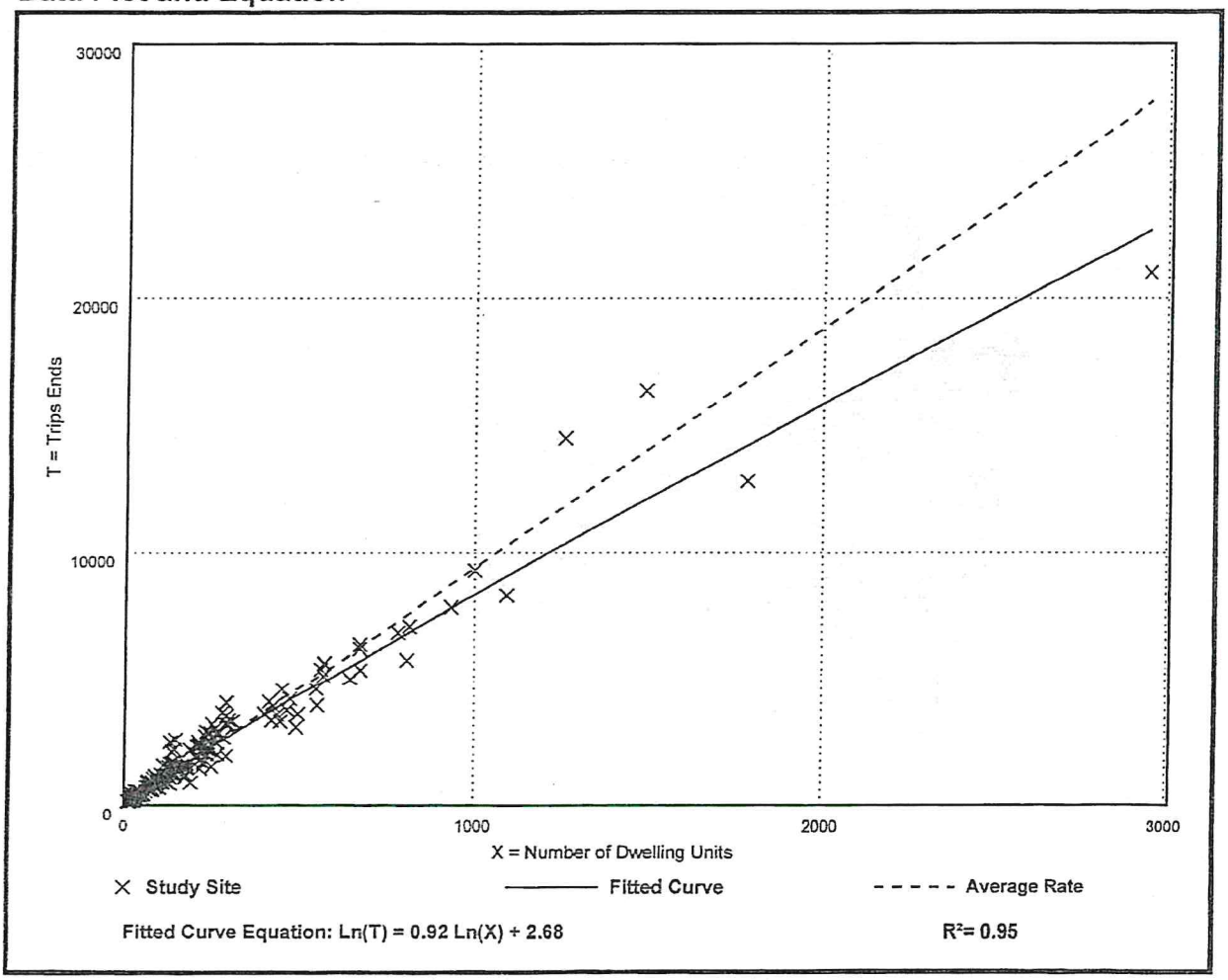
Vehicle Trip Ends vs: Dwelling Units
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 174
Avg. Num. of Dwelling Units: 246
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
9.43	4.45 - 22.61	2.13

Data Plot and Equation



Fitted Curve Equation: Ln(T) = 0.92 Ln(X) + 2.68 **R^2= 0.95**

Land Use: 220
Multifamily Housing (Low-Rise)

Description

Low-rise multifamily housing includes apartments, townhouses, and condominiums located within the same building with at least three other dwelling units and that have two or three floors (levels). Various configurations fit this description, including walkup apartment, mansion apartment, and stacked townhouse.

- A walkup apartment typically is two or three floors in height with dwelling units that are accessed by a single or multiple entrances with stairways and hallways.
- A mansion apartment is a single structure that contains several apartments within what appears to be a single-family dwelling unit.
- A fourplex is a single two-story structure with two matching dwelling units on the ground and second floors. Access to the individual units is typically internal to the structure and provided through a central entry and stairway.
- A stacked townhouse is designed to match the external appearance of a townhouse. But, unlike a townhouse dwelling unit that only shares walls with an adjoining unit, the stacked townhouse units share both floors and walls. Access to the individual units is typically internal to the structure and provided through a central entry and stairway.

Multifamily housing (mid-rise) (Land Use 221), multifamily housing (high-rise) (Land Use 222), affordable housing (Land Use 223), and off-campus student apartment (low-rise) (Land Use 225) are related land uses.

Land Use Subcategory

Data are presented for two subcategories for this land use: (1) not close to rail transit and (2) close to rail transit. A site is considered close to rail transit if the walking distance between the residential site entrance and the closest rail transit station entrance is ½ mile or less.

Additional Data

For the three sites for which both the number of residents and the number of occupied dwelling units were available, there were an average of 2.72 residents per occupied dwelling unit.

For the two sites for which the numbers of both total dwelling units and occupied dwelling units were available, an average of 96.2 percent of the total dwelling units were occupied.

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip

generation resource page on the ITE website (https://www.ite.org/technical-resources/topics/trip-and-parking-generation/).

For the three sites for which data were provided for both occupied dwelling units and residents, there was an average of 2.72 residents per occupied dwelling unit.

It is expected that the number of bedrooms and number of residents are likely correlated to the trips generated by a residential site. To assist in future analysis, trip generation studies of all multifamily housing should attempt to obtain information on occupancy rate and on the mix of residential unit sizes (i.e., number of units by number of bedrooms at the site complex).

The sites were surveyed in the 1980s, the 1990s, the 2000s, the 2010s, and the 2020s in British Columbia (CAN), California, Delaware, Florida, Georgia, Illinois, Indiana, Maine, Maryland, Massachusetts, Minnesota, New Jersey, Ontario (CAN), Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, and Washington.

Source Numbers

188, 204, 237, 300, 305, 306, 320, 321, 357, 390, 412, 525, 530, 579, 583, 638, 864, 866, 896, 901, 903, 904, 936, 939, 944, 946, 947, 948, 963, 964, 966, 967, 1012, 1013, 1014, 1036, 1047, 1056, 1071, 1076

Multifamily Housing (Low-Rise)
Not Close to Rail Transit (220)

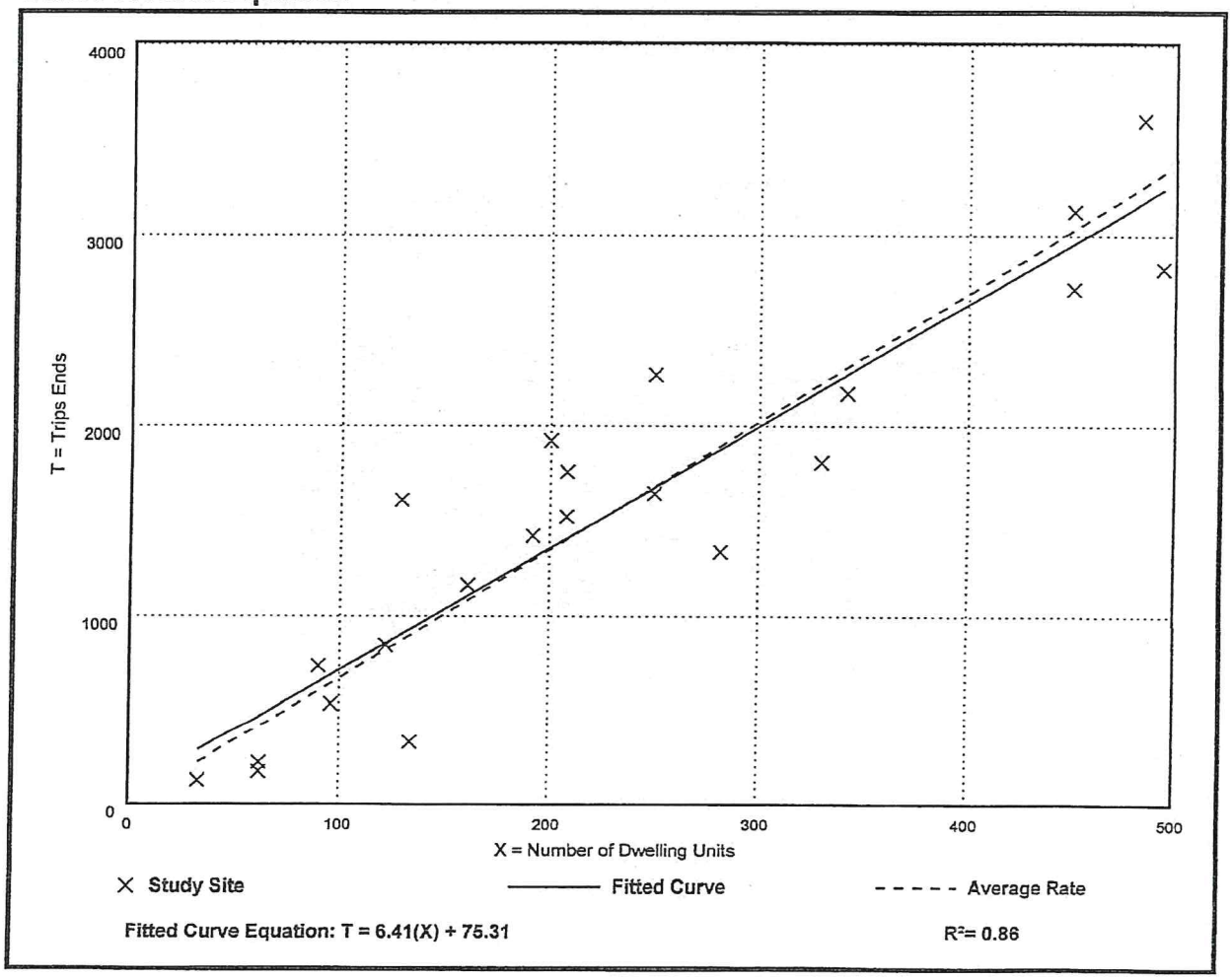
Vehicle Trip Ends vs: Dwelling Units
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 22
Avg. Num. of Dwelling Units: 229
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
6.74	2.46 - 12.50	1.79

Data Plot and Equation



Fitted Curve Equation: T = 6.41(X) + 75.31

R^2= 0.86

Land Use: 430
Golf Course

Description

A golf course is an expansive landscaped area that includes a series of golf holes, each consisting of a tee, fairway, and putting green. The site may have a driving range, clubhouse with a pro shop, restaurant, lounge, or banquet facility. Miniature golf course (Land Use 431), golf driving range (Land Use 432), and multipurpose recreational facility (Land Use 435) are related uses.

Additional Data

The golf courses in this land use are 9-, 18-, and 36-hole municipal courses.

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in Alberta (CAN), California, New Jersey, New York, Oregon, Pennsylvania, and Vermont.

Source Numbers

378, 407, 440, 629, 728, 925, 940, 970

Golf Course
(430)

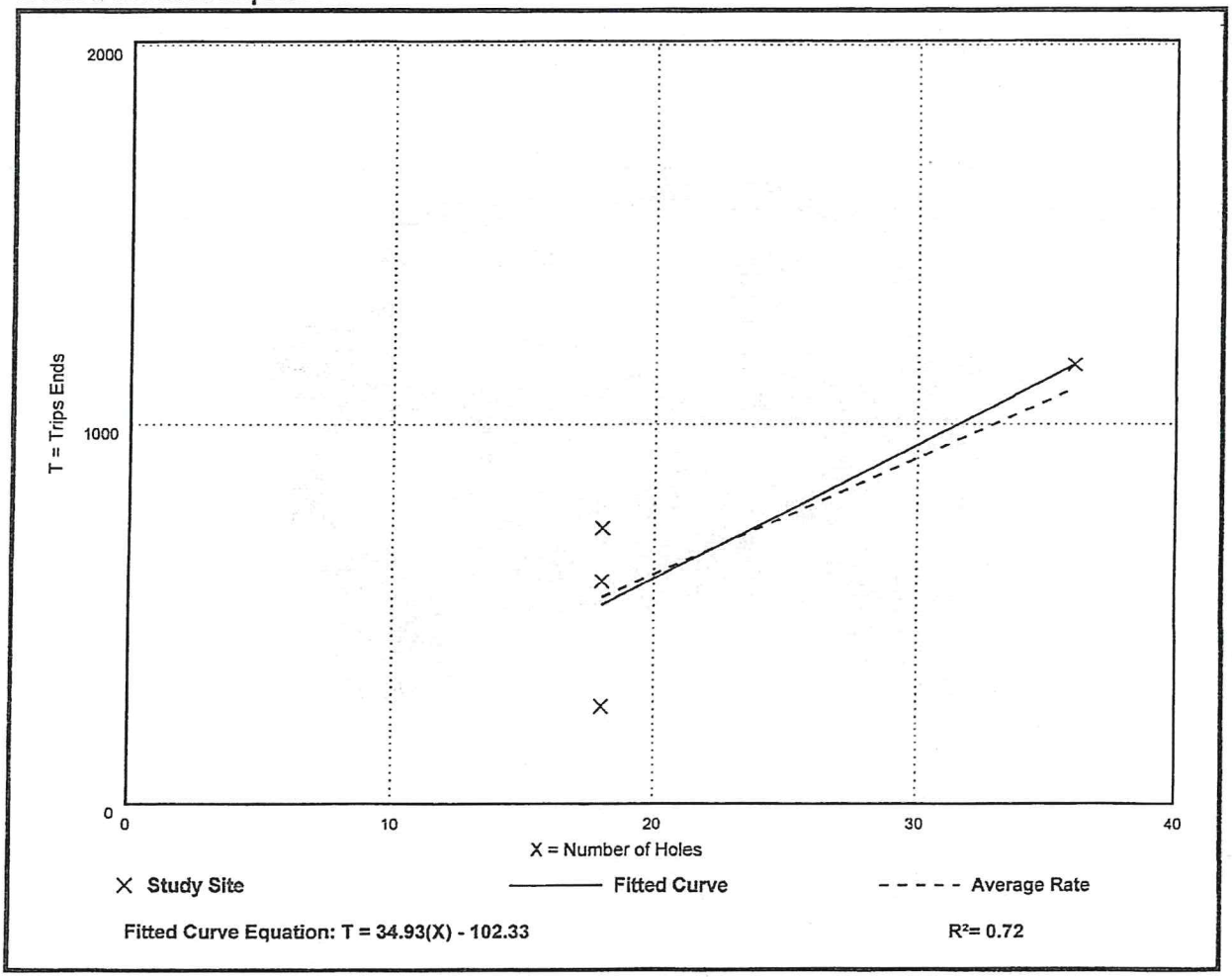
Vehicle Trip Ends vs: Holes
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 4
Avg. Num. of Holes: 23
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Hole

Average Rate	Range of Rates	Standard Deviation
30.38	14.50 - 40.50	9.88

Data Plot and Equation



Fitted Curve Equation: T = 34.93(X) - 102.33

R^2= 0.72