

MONTECITO PLANNING COMMISSION

Coastal Zone Staff Report for the Coral Casino Amendment Project

Hearing Date: March 15, 2023

Staff Report Date: March 7, 2023

Case Nos.: 22AMD-00000-00005 and 22CDP-00000-00079

Environmental Document: EIR Addendum to 04EIR-00000-00006; §15164

Deputy Director: Travis Seawards

Division: Development Review

Supervising Planner: Gwen Beyeler

Supervising Planner Phone #: (805) 934-6269

Planner Contact: Alia Vosburg

Planner Contact Phone #: (805) 934-6259

OWNER/APPLICANT:

1260 BB Property, LLC
c/o Ty Warner Hotels & Resorts, LLC
280 Chestnut Avenue
Westmont, IL 60559

AGENT:

Steve Welton, AICP
Suzanne Elledge Planning & Permitting Services
1625 State Street #1
Santa Barbara, CA 93101
(805)966-2758 x111
steve@sepps.com



1.0 REQUEST

Hearing on the request of 1260 BB Property, LLC, Applicant, to consider Case Nos. 22AMD-00000-00005 and 22CDP-00000-00079 for approval of an Amendment to the Biltmore Hotel and Coral Casino Revised Development Plan (03DVP-00000-00002) to modify Condition Nos. 3 and 22 of the Development Plan conditions of approval in compliance with Sections 35-174.10.2 and 35-169 of the Article II Coastal Zoning Ordinance, on property zoned Resort/Visitor Serving Commercial (C-V); and to accept the Addendum to Environmental Impact Report (EIR) 04EIR-00000-00006 pursuant to Section 15164 of the State Guidelines for Implementation of the California Environmental Quality Act. There are no new or more severe significant environmental impacts as a result of this Amendment request.

The Addendum to the EIR and all documents may be reviewed at the Planning and Development Department, 123 East Anapamu Street, Santa Barbara. The Addendum to the EIR is also available for review at the Central Branch of the City of Santa Barbara Library, 40 East Anapamu Street, Santa Barbara.

The application involves Assessor Parcel Nos. 009-352-009, 009-354-001, 009-351-012 and 009-353-015, located at 1260 and 1281 Channel Drive, in the Coastal Zone of the Montecito Community Plan Area, First Supervisorial District.

2.0 RECOMMENDATION AND PROCEDURES

Staff recommends that the Montecito Planning Commission (Commission) take the following action:

1. Make the required findings for approval of the proposed project specified in Attachments A-1 and A-2 of this Staff Report, including CEQA findings.
2. Approve the Addendum to 04EIR-00000-00006, as provided in Attachment C of this Staff Report, pursuant to CEQA Guidelines Section 15164, and determine that as reflected in the CEQA findings, no subsequent environmental document is required for the proposed project.
3. Approve the proposed project, Case Nos. 22AMD-00000-00005 and 22CDP-00000-00079, subject to the conditions of approval included as Attachment B of this Staff Report.

Refer back to staff for appropriate findings and conditions if the Commission takes an action other than the recommended action.

3.0 JURISDICTION

Section 35-174.10.2 of the Article II Coastal Zoning Ordinance authorizes Amendments for changes to an approved Development Plan that are not in substantial conformity with the approved Development Plan, but are consistent with the findings previously made when the Development Plan was initially approved. This proposed project also requires a Coastal Development Permit pursuant to Section 35-174.10.2.a.1 of the Article II Coastal Zoning Ordinance, which requires a Coastal Development Permit for development requested by an Amendment.

This proposed project is being considered by the Montecito Planning Commission based on Section 35-174.10.2.c.1(d) of the Article II Coastal Zoning Ordinance and Chapter 2, Section 2-29 of the Santa Barbara County Code. Section 35-174.10.2.c.1(d) of the Article II Coastal Zoning Ordinance states that the Zoning Administrator shall hold at least one noticed public hearing on the application for the Amendment and the application for the Coastal Development Permit and approve, conditionally approve, or deny the request. Chapter 2, Section 2-29 of the Santa Barbara County Code states that the Montecito Planning Commission shall assume the powers and duties of the Zoning Administrator within the Montecito Planning Area. The proposed project is located within the Montecito Planning Area, and therefore, the Montecito Planning Commission is the decision maker.

4.0 ISSUE SUMMARY

The Biltmore Hotel has been in operation since 1927, and the Coral Casino has been in operation since 1937. The Coral Casino is a beach and cabana club affiliated with the Biltmore Hotel, which includes pools, cabanas, a café, a restaurant, fitness rooms, and other incidental uses. Both the Biltmore Hotel and the Coral Casino have received various permits for additions and expansions over the years, and are currently operated in compliance with the Biltmore Hotel and Coral Casino Revised Development Plan (Case No. 03DVP-00000-00002, as amended by 05AMD-00000-00005, 07AMD-00000-00011, and 13AMD-00000-00005).

The proposed project requests an Amendment of the Revised Development Plan to modify the conditions of approval to allow limited public use of the existing second floor Coral Casino restaurant. Currently, the Coral Casino restaurant is limited to use by club members, club member guests, registered Biltmore Hotel guests, and guests of registered Biltmore Hotel guests, as provided in Condition No. 22 of the Revised Development Plan conditions. Due to the existing limitations on the type of patrons that have access to the Coral Casino restaurant, the restaurant has been operating well below its permitted capacity. Condition No. 62 of the Revised Development Plan establishes the maximum number of seats associated with the Coral Casino restaurant¹. Under the proposed Amendment, the maximum number of restaurant seats, as established by Condition No. 62, will remain unchanged. However, the proposed Amendment will modify Condition No. 22 with respect to the *types* of patrons that have access to the existing Coral Casino restaurant seats. Under the proposed Amendment, existing restaurant seats will be made available to up to 265 members of the public per day by reservation. Additionally, under the proposed Amendment, guests of registered Biltmore Hotel guests (which were previously allowed access to the restaurant) would be considered members of the public (i.e., counted as part of the allotted 265 members of the public per day maximum).

Associated Transportation Engineers (ATE) prepared an Updated Traffic, Parking, and VMT Analysis (Attachment E) and Addendum (Attachment F), which evaluated the average daily trips (ADT) and peak hour trips (PHT) that would be generated by the proposed public use of the existing Coral Casino restaurant. As detailed in the ATE report, the proposed public use of the Coral Casino restaurant would generate approximately 172 new ADT and 18 new PM PHT. To offset the new ADT and PHT generated by the proposed public use of the restaurant, the proposed Amendment will also modify Condition No. 22 to reduce the Coral Casino monthly membership allowance for members of reciprocal clubs from 120 to 60, and modify Condition No. 3 to reduce the maximum number of Biltmore Hotel guestrooms or “keys” in the Development Plan entitlement from 229 to 192. As detailed in the ATE report, the proposed

¹ Condition No. 62 states: *Indoor restaurant seating in the new second story restaurant, including the member’s dining room, private dining room, bar and lounge areas and regular restaurant seating, shall not exceed 97 seats at any given time, and up to 113 seats for peak events. Outdoor dining area shall not exceed 62 seats associated with restaurant service (not including cabana, Raft, or pool deck lounge service).*

reduction in Coral Casino reciprocal memberships and the proposed reduction in the Biltmore Hotel key entitlement would result in a reduction of 300 ATD and 22 PM PHT. Accordingly, the net change as a result of the proposed Amendment is a reduction of 128 ADT and 4 PM PHT.

Similarly, the ATE report evaluated parking demand that would be generated by the proposed public use of the existing Coral Casino restaurant. As detailed in the ATE report, the proposed public use of the Coral Casino restaurant would generate a new peak parking demand of approximately 26 spaces. However, the proposed reduction in Coral Casino reciprocal memberships and the proposed reduction in the Biltmore Hotel key entitlement would result in a reduction in peak parking demand of approximately 64 spaces. Accordingly, the net change as a result of the proposed Amendment is a reduced peak parking demand of approximately 38 spaces.

Due to the reduction in vehicle trips and parking demand, the ATE report concludes that the proposed Amendment would not have the potential to generate significant traffic, VMT, or parking impacts. A peer review of the ATE report was prepared by Stantec (Attachment G), in which Stantec verified the ATE traffic study assumptions regarding land use and trip generation estimates, the parking analysis parameters, parking demand calculations, and the VMT analysis. The Stantec peer review concurs with the findings of the ATE report.

The existing buildout of the Biltmore Hotel, in its current configuration, does not make use of its entire entitlement of 229 keys. The hotel currently includes 207 guestrooms/keys between the main buildings and cottages. These 207 keys are the maximum that can be currently achieved at the Biltmore, including those made available through the occasional practice of “lock offs”. A “lock off” occurs when a cottage is split into multiple separate guestrooms by securing access to an interior door.

The proposed Amendment will permanently reduce the Biltmore Hotel entitlement by 37 keys (reduced from 229 keys to 192 keys), but will only require a reduction of 15 *existing* guestrooms/keys (reduced from 207 to 192). The reduction in the existing number of Biltmore Hotel guestrooms will be accomplished with interior alterations only to combine adjacent separate guestrooms into singular, larger guestrooms. The reduction in the existing number of Biltmore Hotel guestrooms will not require demolition or exterior construction/alterations.

5.0 PROJECT INFORMATION

5.1 Site Information

Site Information	
Comprehensive Plan Designation	Resort/Visitor Serving Commercial, Urban, Coastal
Ordinance, Zone	Article II, C-V Resort/Visitor Serving Commercial Coastal Commission Appeal Jurisdiction

Site Information	
	Montecito Community Plan Area
Site Size	<u>Total acreage:</u> 19.28 acres <u>Breakdown:</u> APN 009-351-012 – 2.02 acres APN 099-352-009 – 12.32 acres APN 009-353-015 – 3.26 acres APN 009-354-001 – 1.68 acres
Present Use & Development	Cottage-type resort hotel (Biltmore) with associated amenities including restaurant, pool, spa, exercise facilities, tennis courts, conference facilities, etc., and a beach and cabana club (Coral Casino)
Surrounding Uses/Zone(s)	<i>North:</i> TC (Transportation Corridor); Southern Pacific Railroad <i>South:</i> Pacific Ocean <i>East:</i> DR-12 (Design Residential), Residential <i>West:</i> 1-E-1 (Single Family), Residential
Access	Channel Drive
Public Services	<i>Water Supply:</i> Montecito Water District <i>Sewage:</i> Montecito Sanitary District <i>Fire:</i> Montecito Fire Protection District <i>Police Services:</i> County Sheriff

5.2 Background Information

The Biltmore Hotel has operated in its current location since 1927, prior to the establishment of Montecito zoning regulations, which went into effect under Ordinance 453 on March 19, 1930. On March 4, 1937, the Coral Casino was approved by the County Planning Commission under Conditional Use Permit (CUP) 37-CP-1. Various subsequent permits were approved to allow various improvements of the Biltmore Hotel and Coral Casino, including a 1979 CUP (78-CP-14) allowing the expansion of Biltmore Hotel guestrooms and parking. The 1978 CUP included a condition that stated the number of guestrooms/keys shall not exceed 236.

With the adoption of the Local Coastal Plan in 1982 and the Montecito Community Plan in 1992, the site's previous residential zoning was replaced with the Resort/Visitor-Serving Commercial (C-V) designation, consistent with the site's long-standing resort use as a beach club affiliated with the Biltmore Hotel. Under the C-V designation, resort uses require a Development Plan rather than a CUP. The Biltmore Hotel and Coral Casino continued to operate pursuant to 78-CP-14 until 1999. In 1999, an "As-Built" Development Plan (98-DP-031) was approved that allowed the addition of a hotel fitness center, incorporated all existing structures and facilities on site at

the time, and carried over the conditions from 78-CP-14. An Amendment to the Development Plan (98-DP-031 AM01) was approved on July 13, 1999, that allowed a remodel and addition to create a new spa, salon, exercise room, and locker rooms. In 2005, an additional Amendment (04AMD-00000-00001) to 98-DP-031 was approved to allow the general public to use the Biltmore hotel spa on a limited basis and to reduce the maximum allowed number of guestrooms/keys from 236 to 232.

On July 5, 2005, a Revised Development Plan (03DVP-00000-00002) was approved by the Board of Supervisors to allow renovations and various additions to the Coral Casino, as well as related modifications to the Biltmore Hotel. The Revised Development Plan also included a reduction in the number of guestrooms/keys from 232 to 229 to offset potential impacts resulting from the planned operations at the Coral Casino. The Revised Development Plan (03DVP-00000-00002) superseded all prior permits for the Biltmore Hotel and Coral Casino. In December 2008, a Development Plan Amendment (05AMD-00000-00005) was approved to address various utility upgrades, parking area repaving, and employee locker room upgrades at the Biltmore Hotel. In February 2008, a Development Plan Amendment (07AMD-00000-00011) was approved to modify conditions of approval related to conference and group use of the hotel, and use of the hotel spa by Coral Casino members. Finally, in September 2014, a Development Plan Amendment (13AMD-00000-00005) was approved to allow a redesign of exterior spaces and construction of two plunge pools at the Coral Casino.

5.3 Project Description

The proposed project is a request for an Amendment to the Biltmore Hotel and Coral Casino Revised Development Plan (03DVP-00000-00002) and approval of an associated Coastal Development Permit to modify Condition Nos. 3 and 22 of the Development Plan conditions of approval, as detailed below. Condition No. 3 will be modified to reduce the maximum number of permitted Biltmore Hotel guestrooms/keys to 192. Prior to Coastal Development Permit issuance, the Owner/Applicant shall provide site/floor plans to Planning and Development for review and approval. The site/floor plans shall depict the layout of existing Biltmore Hotel guestrooms and the proposed reduction in guestrooms to 192. The reduction in the existing number of Biltmore Hotel guestrooms will be accomplished with interior alterations only to combine adjacent separate guestrooms into singular, larger guestrooms (including suites and junior suites). Condition No. 22 will be modified to allow limited public use of the existing second floor Coral Casino Restaurant, reduce the Coral Casino monthly membership allowance for members of reciprocal clubs, and eliminate the Coral Casino seasonal membership allowance for Biltmore Hotel guests. Additionally, use of the existing 2,050-sq. ft. event/meeting room at the Biltmore Hotel (currently identified as the La Marina banquet room) will be limited to non-dining entertainment and other activities for hotel guests only. This proposed Amendment does not involve any new structural development or exterior alterations to existing development, and no additional services or access will be required. The property will continue to be served by the Montecito Water District, the Montecito Sanitary District, and the Montecito Fire Protection District. Access is provided from Channel Drive. The proposed project is located on a 19.28-acre

property, zoned C-V and shown as Assessor's Parcel Numbers 009-352-009, 009-354-001, 009-351-012 and 009-353-015, located at 1260 and 1281 Channel Drive in the Coastal Zone of the Montecito Community Plan Area, First Supervisorial District.

Changes to Conditions of Approval (deleted text shown in strikethrough font and new text shown in underlined font):

3. *The number of guestrooms or keys shall not exceed ~~229~~192.*

22. *Coral Casino Conditions:*
 - a) *The Coral Casino shall remain a private club.*
 - b) *Guest membership shall be limited to:*
 - 1) *600 – permanent members*
 - 2) ~~*50 – seasonal members, for guest of the Biltmore Deleted*~~
 - 3) *Up to ~~120~~60 members per month from reciprocal clubs located at least 75 miles away from the Coral Casino*
 - c) *With the exception of the 2nd floor restaurant, regular use of the facility shall be limited to club members and their guests, and registered overnight Biltmore Hotel guests only. Guests of registered Biltmore Hotel guests may also use the second story restaurant when accompanied by the registered hotel guest. Such regular use also includes guest privileges afforded to the general manager of the club, for business purposes incidental to the operation of the club. Outside groups may use the facility for special functions. The 2nd floor restaurant shall be available for club members, member guests, and registered hotel guests, including 34 indoor seats reserved only for club members. In addition, the 2nd floor restaurant shall be available for up to 265 members of the public per day, by reservation. Reservation data shall be maintained by the operator and provided to County Planning and Development staff, upon request.*
 - d) *No outdoor music after 10:00 p.m. except Friday, Saturday, Fiesta week, and holidays, when music shall cease at 12:00 midnight.*
 - e) *Activities at the Coral Casino shall be those normally associated with a social, swim, and tennis club.*
 - f) *Use of the restaurant roof sundeck shall only be during daylight hours, through sunset, and during night time hours not more than four times annually.*

6.0 PROJECT ANALYSIS

6.1 Environmental Review

On July 5, 2005, the Board of Supervisors certified the final Environmental Impact Report (04EIR-00000-00006) for the Biltmore Hotel and Coral Casino Revised Development Plan (03DVP-00000-00002). The EIR identified significant impacts on the environment with respect to historic resources and identified significant but mitigable impacts on the environment in the following

categories: aesthetics/visual resources, air quality, archaeological resources, biological resources, geologic processes, land use, noise, transportation and parking, and water resources/drainage.

An Addendum to 04EIR-00000-00006 has been prepared (Attachment C-1) to analyze the proposed Development Plan Amendment in accordance with CEQA Guidelines §15164. The Addendum analyzes the proposed Amendment as it relates to transportation and parking, air quality, and noise. The proposed Amendment does not involve any new structural development or exterior alterations to existing development. As such, the proposed Amendment will have no effect on aesthetics/visual resources, archaeological resources, biological resources, geologic processes, land use, and water resources/drainage.

As discussed in the Addendum (Attachment C-1), the proposed Amendment will not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

6.2 Comprehensive Plan Consistency

REQUIREMENT	DISCUSSION
ADEQUATE SERVICES	
<p><i>Coastal Land Use Plan Policy 2-6:</i> <i>Prior to the issuance of a development permit, the county shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density indicated in the land use plan.</i></p> <p><i>Montecito Community Plan (MCP) Policy CIRC-M-1.5:</i> <i>A determination of project consistency with the standards and policies of this Community Plan Circulation Section shall constitute a determination of consistency with</i></p>	<p>Consistent. Adequate public and private services are available to serve the proposed project.</p> <p>The scope of the proposed Development Plan Amendment is limited to modification of existing Development Plan conditions associated with the operation of the Coral Casino and the maximum number of permitted guestrooms at the Biltmore Hotel. The proposed Amendment does not involve any new structural development or exterior alterations to existing development, and no additional services are required to support the proposed Amendment. The property will continue to be served by the Montecito Water District, the Montecito Sanitary District, and the Montecito Fire Protection District.</p> <p>Additionally, the property will continue to be accessed from Channel Drive. Associated Transportation Engineers (ATE) prepared an</p>

<p><i>Local Coastal Plan Policy #2-6 and LUDP #4 with regard to roadway and intersection capacity.</i></p>	<p>Updated Traffic, Parking, and VMT Analysis (Attachment E) and Addendum (Attachment F), which evaluated the changes in traffic resulting from the proposed Amendment. The ATE report concluded that the proposed Amendment will result in a net reduction of approximately 128 average daily trips (ADT) and a net reduction of approximately 4 PM peak hour trips (PHT). Due to the calculated reduction in ADT and PHT resulting from the proposed Amendment, the ATE report concludes that the Amendment is consistent with local traffic and circulation policies (including Montecito Community Plan policies) and would not cause an exceedance of the policy capacities. A peer review of the ATE report was prepared by Stantec (Attachment G), in which Stantec verified the ATE traffic study assumptions regarding land use and trip generation estimates, the parking analysis parameters, parking demand calculations, and the VMT analysis. The Stantec peer review concurs with the findings of the ATE report.</p> <p>Additionally, the proposed project, along with the ATE report, was reviewed by the Public Works Department Transportation Division and the existing roads providing access to the project site were determined to be adequate to support proposed project traffic.</p> <p>Finally, the existing Condition No. 34 of the Revised Development Plan requires implementation of a Transportation Demand Management Program. Condition No. 34 will remain applicable to the project under the proposed Amendment.</p>
LAND USE	
<p><i>MPC Goal LUC-M-1: Strive to ensure that all commercial development and uses respect the</i></p>	<p>Consistent. The proposed project is consistent with the established physical scale and character of the area.</p>

<p><i>scale and character of surrounding residential neighborhoods.</i></p> <p>MCP Policy LUC-M-1.3: <i>No additional Visitor-Serving Commercial areas shall be designated in Montecito. However, existing resort hotels and motels may be improved on existing sites and neighborhoods.</i></p> <p>MCP Policy LUC-M-1.6: <i>Improvements to resort visitor-serving hotels shall be designed to be consistent with the existing historic “Cottage Type Hotel” tradition from the early days of Montecito. “Cottage Type Hotel” is defined by cottages limited to six guestrooms each, which are generally single story in height.</i></p>	<p>The Biltmore Hotel has been in operation since 1927, and the Coral Casino has been in operation since 1937. Both the Biltmore Hotel and Coral Casino have received various permits for additions and expansions over the years, which have found that the development and uses are compatible in scale and character with the surrounding neighborhood. The proposed Amendment does not involve any new structural development or exterior alterations to existing development. Additionally, the proposed Amendment does not involve any change of use of the existing permitted development. The proposed amendment is limited to minor changes to the operation of the second floor Coral Casino restaurant, which is an existing permitted use. Under the proposed Amendment, there will be no change to the number of restaurant seats or hours of operation. Accordingly, the proposed Amendment will make no change to neighborhood compatibility.</p>
NOISE	
<p>Noise Element Policy 1: <i>In the planning of land use, 65dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in the project design.</i></p> <p>MCP Policy N-M-1.1: <i>Noise-sensitive uses (i.e., residential and lodging facilities, educational facilities, public meeting places, and others specified in the Noise Element) shall be protected from significant noise impacts.</i></p>	<p>Consistent. The proposed project is consistent with the County noise policies.</p> <p>The scope of the proposed Development Plan Amendment is limited to modification of existing Development Plan conditions to allow limited public use of the existing Coral Casino restaurant and a reduction in the maximum number of permitted guestrooms at the Biltmore Hotel. The proposed Amendment does not involve any new structural development or exterior alterations to existing development. As such, the proposed amendment will not generate any noise from construction activities.</p>

	<p>Additionally, under the proposed Amendment, there will be no change to the number of restaurant seats or hours of operation, and the existing condition prohibiting amplified outdoor music at the second story restaurant and restaurant roof sundeck will remain applicable to ongoing operations. Therefore, the proposed Amendment has no effect on noise.</p>
<p>COASTAL ACCESS AND RECREATION</p>	
<p><i>Coastal Act Sec. 30212(a):</i> <i>Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) adequate access exists nearby, or (3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.</i></p> <p><i>Coastal Land Use Plan Policy 7-2:</i> <i>For all new development between the first public road and the ocean granting of an easement to allow vertical access to the mean high tide line shall be mandatory unless: (a) Another more suitable public access corridor is available or proposed by the land use plan within a reasonable distance of the site measured along the shoreline, or (b) Access at the site would result in unmitigable adverse impacts on areas designated as "Habitat Areas" by the land use plan, or (c) Findings are made, consistent with Section 30212 of the Act, that access is inconsistent with public safety, military security needs, or that agriculture would be adversely affected, or (d) The parcel is too narrow to allow for an adequate vertical access corridor without</i></p>	<p>Consistent. The proposed project is consistent with applicable coastal access policies.</p> <p>Vertical and lateral access from the project site to and along the beach (Butterfly Beach) is existing and accessible to the public. The proposed project does not involve any new structural development, exterior alterations to existing development, or alterations to existing coastal access. Additionally, as discussed in detail in Section 4.0 above, the proposed Amendment will result in a net reduction in peak parking demand, and will not impact availability of existing public parking surrounding Butterfly Beach. As such, the proposed project will not interfere with the public's right of access to the sea.</p>

<p><i>adversely affecting the privacy of the property owner. In no case, however, shall development interfere with the public's right of access to the sea where acquired through use unless an equivalent access to the same beach area is guaranteed.</i></p>	
---	--

6.3 Zoning: Article II Coastal Zoning Ordinance Compliance

Section 35-81.1 – Purpose and Intent.

The purpose of the Resort/Visitor Serving Commercial (C-V) district is to provide for tourist recreational development in areas of unique scenic and recreational value, while providing for maximum conservation of the resources of the site through comprehensive site planning. It is the intent of this district to provide for maximum public access, enjoyment, and use of an area's scenic, natural, and recreational resources while ensuring preservation of such resources. Where this district is applied to areas adjacent to the shoreline, uses permitted shall in part require an oceanfront location in order to operate.

Consistent: The proposed project will conform to the purpose and intent of the C-V Zone. The Biltmore Hotel has been in operation since 1927, and the Coral Casino since 1937. The proposed Amendment does not involve any new structural development or exterior alterations to existing development. Additionally, the proposed Amendment does not involve any change of use of the existing permitted development. Accordingly, the proposed Amendment will not result in any change with respect to permitted use, height, and setback requirements of the C-V Zone District.

6.4 Subdivision/Development Review Committee

The proposed project was reviewed by the Subdivision/Development Review Committee (SDRC) on September 15, 2022. Following SDRC review, Environmental Health Services (EHS) provided suggested conditions for the proposed project by letter dated September 15, 2022. Compliance with APCD conditions is required in accordance Condition No. 66 of the Conditions of approval (Attachment B).

6.5 Design Review

Design review by the Montecito Board of Architectural Review was waived for the proposed project pursuant to Section 35-174.10.2.c.1(b) of the Article II Coastal Zoning Ordinance, which states: *"The Department shall refer the applications to the Board of Architectural Review and the Subdivision/Development Review Committee for review and recommendations to the decision-maker. This requirement may be waived by the Director if the Director determines that the requirement is unnecessary."* The proposed project does not include any new structural development. As such, MBAR review of proposed project is determined to be unnecessary.

7.0 APPEALS PROCEDURE

The action of the Montecito Planning Commission may be appealed to the Board of Supervisors within 10 calendar days of said action. Section 35-182.6 of Article II states that no appeal fee will be charged for any development within the Coastal Zone that is appealable to the Coastal Commission.

ATTACHMENTS

- A. Findings
 - A-1. Findings for Case Nos. 22AMD-00000-00005 and 22CDP-00000-00079
 - A-2. Original Findings for the Revised Development Plan Case No. 03DVP-00000-00002
- B. Conditions of Approval for Case Nos. 22AMD-00000-00005 and 22CDP-00000-00079
- C. Environmental Review
 - C-1. CEQA Addendum
 - C-2. Link to 04EIR-00000-00006
- D. Project Plans
- E. ATE Updated Traffic, Parking, and VMT Analysis, dated June 10, 2022
- F. ATE Updated Traffic, Parking, and VMT Analysis Addendum, dated March 2, 2023
- G. Stantec Updated Traffic, Parking, and VMT Analysis Peer Review, dated March 3, 2023

**ATTACHMENT A-1: FINDINGS FOR CASE NOS. 22AMD-00000-00005 AND
22CDP-00000-00079**

1.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

1.1 ADDENDA TO ENVIRONMENTAL IMPACT REPORT (EIR) OR NEGATIVE DECLARATION

FINDINGS PURSUANT TO PUBLIC RESOURCES CODE SECTION 21081 AND THE STATE CEQA GUIDELINES SECTIONS 15162 AND 15164:

1.1.1 CONSIDERATION OF THE ADDENDUM AND FULL DISCLOSURE

The Montecito Planning Commission has considered the Addendum dated March 7, 2023, together with the previously certified Environmental Impact Report (EIR) Case No. 04EIR-00000-00006 (Attachments C-1 and C-2 of the Staff Report dated March 7, 2023, incorporated herein by reference). The Addendum reflects the independent judgement of the Montecito Planning Commission and has been completed in compliance with CEQA. The Addendum, together with the previously certified EIR, is adequate to fulfill the environmental review requirements of the proposed project. On the basis of the whole record, including the Addendum, the previously certified CEQA document, and any public comments received, the Montecito Planning Commission finds that the proposed project changes described in the Addendum will not create any new significant effects or a substantial increase in the severity of previously identified significant effects on the environment nor present new information of substantial importance pursuant to the State CEQA Guidelines Section 15162.

1.1.2 LOCATION OF DOCUMENTS

The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the Planning and Development Department located at 123 East Anapamu Street, Santa Barbara, CA 93101.

Additionally, documents and other materials are available online at the following link:
<https://cosantabarbara.app.box.com/s/o4z9jfqjgg3h2gp4h9u3zfiicvz4qclid/folder/196943252397>

1.1.3 ENVIRONMENTAL REPORTING AND MONITORING PROGRAM

Public Resources Code Section 21081.6 and State CEQA Guidelines Section 15091(d) require the County to adopt a reporting or monitoring program for the changes to the project that it has adopted or made a condition of approval in order to avoid or substantially lessen significant effects on the environment. The approved project description and conditions of approval, with their corresponding permit monitoring requirements, are hereby adopted as the reporting and monitoring program for this

project. The monitoring program is designed to ensure compliance during project implementation.

1.1.4 FINDINGS ADDRESSING ADDENDUM ISSUE AREAS

The Addendum prepared for the proposed Development Plan Amendment addresses the following issues: historic resources, aesthetics/visual resources, air quality, archaeological resources, biological resources, geologic processes, land use, noise, transportation and parking, and water resources/drainage. There are no substantial changes to the Revised Development Plan (Case No. 03DVP-00000-00002) that will cause new significant environmental effects or a substantial increase in severity of previously identified significant effects. As discussed in detail in the Addendum prepared for the proposed Amendment (Attachment C-1 of the Staff Report dated March 7, 2023, incorporated herein by reference), the Amendment will modify Condition Nos. 3 and 22 of the Development Plan conditions of approval to allow limited public use of the existing second floor Coral Casino Restaurant, reduce the Coral Casino monthly membership allowance for members of reciprocal clubs, eliminate the Coral Casino seasonal membership allowance for Biltmore Hotel guests, and reduce the maximum number of permitted Biltmore Hotel guestrooms/keys. The Addendum provides substantial evidence that the proposed Amendment is within the scope of the previously certified EIR, and that it will not result in new significant effects or a substantial increase in the severity of previously identified significant effects as compared to the Development Plan analyzed in the EIR (Attachment C-2 of the Staff Report dated March 7, 2023, incorporated herein by reference).

No substantial changes have occurred with respect to the circumstances under which the project is being undertaken, no new significant effects have been identified, and there will be no substantial increase in severity of previously identified significant effects. No new information of substantial importance shows that the proposed Amendment will have significant effects not discussed under the previous environmental review for the approved Development Plan, no significant effects will be substantially more severe than previously shown, and no new mitigation measures or alternatives have been found feasible that the applicant has declined to adopt. Therefore, the County of Santa Barbara as the Lead Agency for the proposed project prepared an Addendum to the previously certified EIR, pursuant to the State CEQA Guidelines Section 15164, to reflect the changes to the EIR required by the Amendment.

2.0 ADMINISTRATIVE FINDINGS

2.1 DEVELOPMENT PLAN AMENDMENT FINDINGS

A. Development that may be appealed to the Coastal Commission. In compliance with Section 35-174.10.2 of Article II, the Coastal Zoning Ordinance, prior to the approval or conditional approval of an application for an Amendment to an approved Final Development Plan that would allow for development that may be appealed to the Coastal Commission the decision-maker shall first make all of the following findings:

- 1. That the findings required for approval of the Final Development Plan, including any environmental review findings made in compliance with the California Environmental Quality Act, that were previously made when the Final Development Plan was initially approved remain valid to accommodate the project as revised with the new development proposed by the applications for the Amendment and the Coastal Development Permit.**

The Montecito Planning Commission finds that the original findings required for approval of the Development Plan, 03DVP-00000-00002, included as Attachment A-2, to the Staff Report dated March 7, 2023, incorporated herein by reference, remain valid to accommodate the project as revised by the proposed Amendment. As discussed in Sections 6.2 and 6.3 of the Staff Report, the proposed Amendment is consistent with all applicable requirements of Article II, the Coastal Zoning Ordinance, and the Comprehensive Plan, including the Coastal Land Use Plan and the Montecito Community Plan. The proposed Amendment will modify conditions of approval related to ongoing operation of the existing Biltmore Hotel and Coral Casino. The proposed Amendment does not involve any change of use of the existing permitted development and will make no change to neighborhood compatibility. Additionally, the proposed Amendment does not involve any new structural development or exterior alterations to existing development, and no additional services or access will be required as a result of the proposed Amendment.

Furthermore, as discussed in the Addendum, Attachment C-1, to the Staff Report dated March 7, 2023, incorporated herein by reference, the proposed Amendment will not create any new significant effects or a substantial increase in the severity of previously identified significant effects on the environment and therefore the previous environmental review findings remain valid.

- 2. That the environmental impacts related to the development proposed by the application for the Amendment are determined to be substantially the same or less than those identified during the processing of the previously approved Final Development Plan.**

The Montecito Planning Commission finds that the environmental impacts related to the development proposed by the Amendment are substantially the same or less than those identified during the processing of the previously approved Development Plan. As discussed in the Addendum, Attachment C-1, to the Staff

Report dated March 7, 2023, and incorporated herein by reference, the proposed Amendment will not create any new significant effects or a substantial increase in the severity of previously identified significant effects on the environment. The existing mitigation measures remain applicable to the project. Therefore, the environmental impacts related to the proposed Amendment will be substantially the same as those identified under the previously approved Development Plan.

2.2 COASTAL DEVELOPMENT PERMIT FINDINGS

- A. *Findings required for all Coastal Development Permits. In compliance with Section 35-60.5 of the Article II Coastal Zoning Ordinance, prior to issuance of a Coastal Development Permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and/or the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development.***

The Montecito Planning Commission finds that as discussed in Section 6.2 of the Staff Report dated March 7, 2023, and incorporated herein by reference, existing public services are adequate to serve the proposed project. No new or additional services or access will be required for the proposed project. The property will continue to be served by the Montecito Water District, the Montecito Sanitary District, and the Montecito Fire Protection District. Additionally, the project site will continue to be accessed from Channel Drive. The proposed project was reviewed by the County Transportation Division and the existing roads providing access to the project site were determined to be adequate to support proposed project traffic.

- B. *Findings required for Coastal Development Permit applications subject to Section 35-169.4.3 for development that may be appealed to the Coastal Commission. In compliance with Section 35-169.5.3 of the Article II Coastal Zoning Ordinance, prior to the approval or conditional approval of an application for a Coastal Development Permit subject to Section 35-169.4.3 for development that may be appealed to the Coastal Commission the decision-maker shall first make all of the following findings:***
- 1. *The proposed development conforms:***
 - a. *To the applicable provisions of the Comprehensive Plan, including the Coastal Land Use Plan;***
 - b. *The applicable provisions of this Article or the project falls within the limited exceptions allowed in compliance with Section 161 (Nonconforming Use of Land, Buildings and Structures).***

The Montecito Planning Commission finds that, as discussed in Section 6.2 and 6.3 of the Staff Report dated March 7, 2023, and incorporated herein by reference, the proposed project, as conditioned, complies with the applicable provisions of the

Article II Coastal Zoning Ordinance and the Comprehensive Plan, including the Coastal Land Use Plan.

2. *The proposed development is located on a legally created lot.*

The Montecito Planning Commission finds that the proposed project is located on a legally created lot. The property is recognized as a legal lot through the extensive permit history beginning with the approval of 37-CP-1 in 1937.

3. *The subject property and development on the property is in compliance with all laws, rules and regulations pertaining to zoning uses, subdivisions, setbacks and any other applicable provisions of this Article, and any applicable zoning violation enforcement fees and processing fees have been paid. This subsection shall not be interpreted to impose new requirements on legal nonconforming uses and structures in compliance with Division 10 (Nonconforming Structures and Uses).*

The Montecito Planning Commission finds that as discussed in Sections 5.2, 6.2, and 6.3 of the Staff Report dated March 7, 2023, and incorporated herein by reference, the subject property and development on the property is in compliance with all laws, rules, and regulations pertaining to zoning uses, subdivisions, setbacks, and any other applicable provisions of the Article II Coastal Zoning Ordinance. All development on the property has been permitted in accordance with the County ordinances in effect at the time of development.

4. *The development will not significantly obstruct public views from any public road or from a public recreation area to, and along the coast.*

The Montecito Planning Commission finds that the proposed project will not significantly obstruct public views from any public road or from a public recreation area to, and along the coast. The proposed project does not involve any new structural development or exterior alterations to existing development. Accordingly, the proposed project will have no effect on existing public views.

5. *The proposed development will be compatible with the established physical scale of the area.*

The Montecito Planning Commission finds that the proposed project is compatible with the established physical scale of the area. The Biltmore Hotel has been in operation since 1927, and the Coral Casino since 1937. Both the hotel and beach club have received various permits for additions and expansions, which have found that the development and uses are compatible in scale and character with the surrounding neighborhood. The proposed project does not involve any new

structural development or exterior alterations to existing development. Additionally, the proposed project does not involve any change of use of the existing permitted development. Accordingly, the proposed project will make no change to neighborhood compatibility.

6. *The development will comply with the public access and recreation policies of this Article and the Comprehensive Plan including the Coastal Land Use Plan.*

The Montecito Planning Commission finds that, as discussed in Section 6.2 of the Staff Report dated March 7, 2023, incorporated herein by reference, the project will comply with the public access and recreation policies of the Article II Coastal Zoning Ordinance and the Comprehensive Plan including the Coastal Land Use Plan. Vertical and lateral access from the project property to and along the beach below is existing and accessible to the public. The proposed project does not involve any new structural development, exterior alterations to existing development, or alterations to existing coastal access. As such, the proposed project will not interfere with the public's right of access to the sea.

**ATTACHMENT A-2: ORIGINAL FINDINGS FOR THE BILTMORE HOTEL AND CORAL
CASINO REVISED DEVELOPMENT PLAN CASE NO. 03DVP-00000-00002**

ATTACHMENT C-1

BOARD OF SUPERVISORS FINDINGS

JULY 5, 2005

1.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

FINDINGS PURSUANT TO PUBLIC RESOURCES CODE SECTION 21081 AND THE CEQA GUIDELINES SECTIONS 15090 AND 15091:

1.1 CONSIDERATION OF THE EIR and FULL DISCLOSURE

The Board of Supervisors has reviewed and considered the Final Environmental Impact Report (EIR), 04-EIR-00000-00006, dated April 2005, and its appendices pursuant to CEQA Guidelines Section 15096, and the environmental effects of the project as shown in the EIR prior to approval. The Board has determined that the document is adequate for this proposal. In addition, all voting Board members have reviewed and considered the complete record before it, including testimony and additional information presented at or prior to the public hearing of July 5, 2005. The Board further finds that the EIR analyzes a reasonable range of alternatives to the proposed project. The EIR reflects the independent judgment of the Board of Supervisors.

1.2 FULL DISCLOSURE

The Board of Supervisors finds and certifies that the Final EIR constitutes a complete, accurate, adequate and good faith effort at full disclosure under CEQA. The Board further finds and certifies the Final EIR has been completed in compliance with CEQA.

1.3 LOCATION OF RECORD OF PROCEEDINGS

The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the Clerk of the Board, 105 East Anapamu Street, and related files with the Secretary of the Montecito Planning Commission, Mr. Steve Chase, and with the Secretary of the Historic Landmarks Advisory Commission, Ms. MaryLouise MorganWard, both of Planning and Development, located at 123 E. Anapamu St., Santa Barbara, CA 93101.

1.4 FINDINGS THAT CERTAIN UNAVOIDABLE IMPACTS ARE MITIGATED TO THE MAXIMUM EXTENT FEASIBLE

The Final Environmental Impact Report for the Coral Casino project identifies environmental impacts within the historic resources area that cannot be mitigated to a level of insignificance and are therefore considered unavoidable. The project has substantially lessened these impacts by the incorporation of changes or alterations into the project where feasible, including retention of a bench around the northern portion of the pool deck and adaptive reuse of building features related to the second floor cabanas. To the extent the impacts remain significant and unavoidable, such impacts are acceptable when weighed against the overriding social, economic, legal, technical, and other considerations set forth in the Statement of Overriding Considerations included herein. The "Class I" impacts identified by the Final EIR are discussed below, along with the appropriate findings as per CEQA Section 15091:

- 1.4.1 Historic Resources: The relocation of a restaurant to the second floor contributes to the loss of historic fabric including, without limitation, the second floor cabanas and is considered significant and unavoidable due to the removal of original historic fabric from portions of the Coral Casino building, an identified historic resource. This removal, in part, would not comply with the *Secretary of the Interior's Standards for Rehabilitation*.

To address this impact, mitigation measures identified in the Final EIR, Section 5.7.5, were adopted on May 5, 2005 by the MPC and on May 16, 2005 by the HLAC as conditions of approval, cited below. These mitigation measures are summarized below, with full text of conditions provided in Attachment D (MPC Action Letter) and Attachment E (HLAC Notice of Action Letter) to the Board Letter, and are adopted by the Board as provided in Attachment C.

Mitigation

- a. The applicant shall complete a documentation survey of the property in accordance with the Historic American Building Survey (HABS) standards, including archival quality photographs of significant interior and exterior features, and elevations with an emphasis placed on historic features to be demolished, and preparation of detailed "as built" site and floor plans. (Mitigation Measure 5.7.5.B.1/MPC Condition 39/HLAC Condition 2)
- b. A County approved historic preservation professional shall review treatments for non-structural building components and refurbishments and shall review project plans prior to issuance of applicable permits. (Mitigation Measure 5.7.5.B.2/ MPC Condition 40/ HLAC Condition 3)
- c. A County approved architect specializing in historic preservation shall review project working drawings to assure the retention of historic building fabric where it is not specifically slated for removal, and that alterations comply with the Secretary of the Interior's Standards as much as possible. To the extent feasible, the landscape plan for the property shall be based upon documented historical and forensic evidence, retaining on site extant plantings from the period of significance or replacing them in-kind with compatible, suitable substitute plant materials. (Mitigation Measure 5.7.5.B.3/ MPC Condition 41/ HLAC Condition 4)
- d. Create an interpretive plan for the property for display in a permanent, publicly accessible on-site or off-site location. (Mitigation Measure 5.7.5.B.4/ MPC Condition 42/HLAC Condition 5)
- e. Prepare a historic preservation protocol plan for construction personnel that specifies how treatments of interior and exterior building fabric must be handled during site construction activities, including hazardous material abatement, and provide for the presence of a P&D approved historic resources professional on site during these stages. (Mitigation Measure 5.7.5.B.5/ MPC Condition 42/ HLAC Condition 6)
- f. The MBAR, in conjunction with HLAC, shall meet jointly and review and approve in separate actions the Preliminary and Final working drawings with architectural, landscape and building plans prior to the approval of applicable Coastal Development Permits for the project. HLAC's review shall be limited to the historical aspects of the project, consistent with County Code Section 18A, Section 5. (Not included in EIR/ MPC Condition 82/ HLAC Condition 7)

However, such mitigation measures may not significantly reduce the identified Class I impacts to the building below a level of insignificance.

1.5 FINDINGS THAT CERTAIN IMPACTS ARE MITIGATED TO INSIGNIFICANCE BY CONDITIONS OF APPROVAL

The Final EIR, 04-EIR-00000-00006 identified several subject areas for which the project is considered to cause or contribute to significant, but mitigable environmental impacts. Each of these impacts is discussed below along with the appropriate findings as per CEQA Section 15091. To address these impacts, applicable mitigation measures identified in the Final EIR were adopted on May 5, 2005 by the MPC and on May 16, 2005 by the HLAC (where applicable) as conditions of approval, summarized below and specifically cited parenthetically. These measures are adopted by the Board of Supervisors on July 5, 2005 (Attachment C).

1.5.1 Aesthetics

Potentially significant aesthetic impacts that can be feasibly mitigated or avoided are associated with visual impacts from relocation of the restaurant to the second story, building massing as seen from the beach, visibility of umbrellas on the first floor, awnings outside the second floor restaurant, and potential impacts of night lighting both on and off-site (lighting of the ocean in front of the Coral Casino). The project would contribute incrementally to potentially significant aesthetic impacts from reasonably foreseeable cumulative development.

Applicable policies incorporated as mitigation measures in section 5.1.5 of the FEIR, as well as those provided in the adopted Montecito Architectural Guidelines and Development Standards, would mitigate these impacts to a level of insignificance, are summarized below:

Mitigation Measure

- a. The design, scale, and character of the project architecture shall be compatible with vicinity development, with particular attention to color, visibility, design of the proposed 2nd story restaurant and proposed restaurant roof sundeck, including awnings and umbrellas. *(Mitigation Measure 5.1.5.1/ MPC Condition 26)*
- b. Future structures, including rail treatments around the relocated restaurant on the second floor, shall not exceed the heights identified in the project description and on the project plans. *(Mitigation Measure 5.1.5.2/ Reflected in MPC Condition 1)*
- c. Shade structures on the restaurant roof sundeck shall be limited to chairs with individualized canopies/awnings, and no umbrellas shall be permitted on this restaurant roof sundeck. *(Mitigation Measure 5.1.5.3/ MPC Condition 28)*
- d. The applicant shall prepare a Tree Protection Plan designed to preserve during construction all trees and specimen plantings identified to remain, as indicated on the project landscape plans. *(Mitigation Measure 5.1.5.4/ MPC Condition 29)*
- e. Night-lighting and its intensity shall be minimized to the extent feasible for security and safety purposes and night-lighting shall be reduced following the close of activities on-site any given day. Any exterior night lighting installed on the project site shall be of low intensity, low glare design, and, with the exception of in-ground uplights, shall be hooded to direct light downward onto the subject parcel and prevent spill-over onto adjacent parcels. *(Mitigation Measure 5.1.5.5/ MPC Condition 30)*
- f. A trash storage area shall be installed which is architecturally compatible with the project design. The storage area shall be enclosed with a solid wall or gate of sufficient height to screen the area and shall include a gate. *(Mitigation Measure 5.1.5.6/ MPC Condition 31)*

Mitigation measures including, but not limited to, the measures identified above have been found to mitigate this impact to a level of insignificance.

1.5.2 Air Quality

Potentially significant project impacts related to the use of motor vehicles by employees, members and guests of the Coral Casino facility are not expected to create air quality impacts. Due to the project involving primarily remodeling, limited grading, and few operational changes in the future, it is not expected to cause ambient air quality to degrade below federal and state standards. Long term operational emissions of NOx, ROG and CO normally associated with increased vehicle trips are considered adverse but less than significant. Air Pollution Control District (APCD) staff indicated that

the project could be found consistent with the Clean Air Plan due to the insignificant contribution to air quality impacts resulting from the project.

Mitigation

- a. Applicant shall complete the "Asbestos Demolitions/Renovation Notification form, provided with APCD memo dated March 17, 2003. (Mitigation Measure 5.2.5.1/ MPC Condition 32)
- b. Dust generated by the development activities shall be retained onsite and kept to a minimum by dust control measures listed in section 5.2 of the FEIR. Reclaimed water shall be used whenever possible. (Mitigation Measure 5.2.5.2/ MPC Condition 33)
- c. The applicant shall develop or document a Transportation Demand Management Program for the combined Coral Casino and Biltmore Hotel sites. Components of such a program shall be designed to effectively reduce vehicle demand and peak hour trips associated with the project, and could include purchase of, or discounts on, Metropolitan Transit District (MTD) bus passes, provision of employee amenities that encourage alternative transportation use, including bicycle storage lockers, and an employee lunchroom, refrigerator, microwave oven, sink, food preparation area, tables, and chairs. (Recommended Measure 5.2.5.3.a, b, and d only/ MPC Condition 34)
- d. Orientation of employees regarding the Ridesharing Program or similar successor programs administered by the Santa Barbara County Association of Governments or successor agency. (Mitigation Measure 5.2.5.3.c/ MPC Condition 34 a, b, and d.)
- e. The Hotel operator shall participate in any shuttle pass program developed by the County of Santa Barbara. (Mitigation Measure 5.2.5.3.e/ MPC Condition 35 f)
- f. The Coral Casino shall continue to maintain employee work shifts that avoid the peak hours of adjacent street traffic (7-9 a.m. and 4-6 p.m.). (Mitigation Measure 5.2.5.3.f/ MPC Condition 34 g)

Mitigation measures including, but not limited to, the measures identified above have been found to mitigate this impact to less than significant levels

1.5.3 Archacology:

Potentially significant archacology impacts that could be feasibly mitigated or avoided are associated with the potential for significant, unknown buried cultural remains to be encountered within the project site during grading.

Mitigation

- a. In the event that archacological remains are encountered during grading, work shall be stopped and the applicant shall fund evaluation of the resources encountered and shall implement recommended mitigation, consistent with County Archacological Guidelines. (Mitigation Measure 5.3.5.1/ MPC Condition 35)

Mitigation measures including, but not limited to, the measure identified above have been found to mitigate this impact to less than significant levels.

1.5.4 Biological Resources:

The Coral Casino site is not located near an Environmentally Sensitive Habitat area or riparian corridor and does not contain significant biological habitat area, although it is located adjacent to the Pacific Ocean. A number of trees are proposed to be replaced with similar species, but in smaller sizes, including the series of Giant Yuccas located in front of the building. These plants are a non-native

species that are neither threatened nor are host to other biological resources such as butterflies or raptors. One 28-inch Monterey Pine tree is proposed to be removed at the northeastern corner of the building. No significant wildlife has been documented near the project site, and since the facility has existed with night lighting and activity next to the existing ocean environment for many years, indirect impacts associated with noise and night lighting are considered adverse, but less than significant. Overall, biological resource impacts can be considered less than significant.

The improvement of the storm drain system through the Coral Casino site, as well as the re-direction of pool drain discharge to the Montecito Sanitary District system will improve surface runoff conditions that have gone to the ocean previously.

Mitigation

- a. During construction, washing of concrete, trucks, paint, or equipment shall occur only in areas where polluted water and materials can be contained for subsequent removal from the site. Wash water shall not be discharged to the storm drains, street, drainage ditches, creeks, or wetlands, and shall not be allowed near sensitive biological resources. Areas designated for washing functions shall be identified. (*Mitigation Measure 5.4.4.1/ MPC Condition 54*)
- b. To minimize pollutants impacting the sea, storm drain filters/inserts, inline clarifiers, or separators shall be installed in the project area storm drain inlets and/or paved areas. The filters/inserts shall be maintained in working order. (*Mitigation Measure 5.4.4.2/ MPC Condition 52*)

Mitigation measures including, but not limited to, the measure identified above have been found to mitigate this impact to less than significant levels.

1.5.6 Geology

Potentially significant geologic impacts that can be feasibly mitigated or avoided are associated with ground shaking from potential earthquakes (potential structural impacts), and potential erosion, sedimentation and runoff as a result of grading and construction activities.

Mitigation

- a. Buildings shall be designed consistent with California Building Code or the State Historic Building Code requirements. (*Mitigation Measure 5.6.4.1/ MPC Condition 37/ HLAC Condition 15*)
- b. Erosion control measures shall be implemented in accordance with an approved Grading and Erosion Control Plan to prevent transport of sediment during construction. (*Mitigation Measure 5.6.4.2/ MPC Condition 38*)

The mitigation measures including, but not limited to, the measures stated above have been found to mitigate these impacts to less than significant levels.

1.5.7 Historic Resources

The project proposes complete removal of an historic element of the Coral Casino that can not be mitigated to less than significant levels. Other areas of work may also create potentially significant impacts to historic features of the building, but many of these areas have either already been altered, or are not considered character defining features, and therefore such changes have not been determined to be inconsistent with the *Secretary's Standards*. Therefore, work on these areas (e.g. interior work in the La Pacifica ballroom, eastern cabanas) is considered potentially significant but mitigable with the conditions 39-43 and 82 of the MPC action, summarized above under Finding 1.4.1, as well as additional conditions provided below, incorporated as HLAC conditions as parenthetically referenced below:

- a. Detailed design recommendations from the 2002 Historic Structure Report by Preservation Planning Associates shall be incorporated. (HLAC condition 8)
- b. The project shall retain the 28" Monterey Pine tree and other historic landscaping character. (HLAC condition 9)
- c. The existing tower door shall remain understated in appearance and follow specified design restrictions. (HLAC condition 10)
- d. The concrete bench at the north end of the pool shall be retained, as offered by the applicant during HLAC hearings. (HLAC condition 11).
- e. The number of semi-permanent umbrellas that can be allowed adjacent to the La Pacifica ballroom shall be limited. (HLAC condition 12)
- f. Required storage of bar-b-que equipment and other portable items shall be located away from the viewshed between the clock tower and the members' lounge. (HLAC condition 13)
- g. The second floor and roof sundeck deck glass guardrails shall meet certain design restrictions (i.e. no cap, specified glass type). (HLAC condition 14)
- h. The structures shall be designed using the California or State Historic Building Code to the maximum extent feasible. (HLAC condition 15)

Mitigation measures including, but not limited to, the measures stated above have been found to mitigate historic impacts to less than significant levels.

1.5.8 Land Use

The project would maintain the use of the Biltmore Hotel and Coral Casino as a resort and visitor serving land use, consistent with its zoning designation. The Board of Supervisors finds that as an architectural projection and not a roofed structure, the rooftop sundeck railing does not result in an inconsistency with Policy CR-M-1.2 of the Montecito Community Plan. Other land use related issues such as noise, traffic, air quality have been addressed in those topical areas in these findings and in the EIR.

Mitigation

None required

1.5.9 Noise

Noise associated with creation of the outdoor seating area at the proposed second story restaurant would not represent a substantial increase in the ambient noise level. Potentially significant impacts that could be reasonably mitigated include short term construction noise and outdoor amplified music at the proposed second story restaurant.

Mitigation

- a. Construction activity for site preparation and construction equipment maintenance shall be limited to the hours between 7:00 a.m. and 4:30 p.m., Monday through Friday, with no construction on State holidays (e.g., Thanksgiving, Labor Day). (Mitigation Measure 5.9.5.1/ MPC Condition 44)

- b. Stationary construction equipment that generates noise which exceeds 65 dBA at the project boundaries shall be shielded, to P&D's satisfaction and shall be located as far as possible from occupied residences. (Mitigation Measure 5.9.5.2/ MPC Condition 45)
- c. Construction routes shall be limited to Olive Mill Road, Channel Drive, and North Jameson Lane, and notice shall be provided to County Permit Compliance of the construction activity, schedule and routes. (Mitigation Measure 5.9.5.3, amended by MPC Condition 46)
- d. No outdoor music shall be allowed on the first floor after 10:00 p.m. except Friday, Saturday, Fiesta week, and holidays, when music shall cease at 12:00 midnight. (Mitigation Measure 5.9.5.4, Modified as MPC Condition 47)
- e. Outdoor amplified music shall not be permitted at the outdoor dining area of the proposed second story restaurant, or on the restaurant roof sundeck, at any time. (Mitigation Measure 5.9.5.5/ Modified as MPC Condition 47)

Mitigation measures including, but not limited to, the measures stated above have been found to mitigate noise impacts to less than significant levels.

1.5.10 Public Services - Sewer

Potentially significant sewer impacts that can be feasibly mitigated or avoided are associated with required upgrades of the building and compliance with requirements of the Montecito Sanitary District. Such requirements also include future coordination with the District regarding maintenance of the pool and its drainage.

Sewer Mitigation

- a. The applicant shall submit final working drawings to the Montecito Sanitary District that include specifications for future wastewater flows, upgrades of kitchen equipment and grease interceptors consistent with District standards. (Mitigation Measure 5.10.1.D.1/ MPC Condition 48)
- b. Coordinate future timing of pool drainage with the Montecito Sanitary District. (Mitigation Measure 5.10.1.D.2/ MPC Condition 49)

Mitigation measures including, but not limited to, the measure stated above have been found to mitigate sewer impacts to less than significant levels.

1.5.11 Public Services - Solid Waste

The Coral Casino Historic Rehabilitation Plan would result in a net increase of floor area, which serves as the only basis for estimating solid waste impacts. The project may generate a total of 33.35 tons per year of new solid waste, based only on the net increase in floor area, calculated as an eating and drinking establishment, and not on specific programmatic details. This figure is below project specific and cumulative thresholds, so this impact is considered less than significant, but would contribute cumulatively to generation of increased solid waste going to area landfills.

Recommended Solid Waste Mitigation

- a. Preparation of a long term Solid Waste Management Plan and implementation of this plan for the life of the project. (Mitigation Measure 5.10.2.E.1/ MPC Condition 50)
- b. Demolition and/or construction material shall be separated and recycled. (Mitigation Measure 5.10.2.E.2/ MPC Condition 51)

Mitigation measures including, but not limited to, the measure stated above are recommended to address the project's contribution to cumulative solid waste generation, but is not required as the project is anticipated to have a less than significant impact in this issue area.

1.5.12 Public Services - Water Resources/Flooding

During construction activities, the Coral Casino project is expected to create water quality impacts resulting from construction equipment, erosion and sedimentation. The project's long term improvements to drainage both off-site and on-site, along with filtration methods planned for onsite surface drainage, would be considered a beneficial impact of the project. While the project would not require its own National Pollution Discharge and Elimination System (NPDES) permit, it would be required to comply with the County's NPDES permit through application of best management practices and related water quality mitigation measures.

The project would not be increasing flooding hazards, and the conversion of the basement area to offices and storage space are expected to meet County flood control standards. Therefore, flooding impacts are considered less than significant.

The levels of facility use resulting from the project would not change substantially from today's condition, and due to the availability of adequate water supplies in the Montecito groundwater basin, the project would have a less than significant effect on groundwater resources.

Mitigation

- a. Implementation of related erosion control measures from the Geology findings.
- b. Installation of storm drain filters/inserts, clarifiers or separators in project area storm drain inlets and/or paved areas; design of a clearly defined permanent overland escape path, and implementation of a comprehensive drainage plan. (Mitigation Measure 5.10.3.D.1/ MPC Condition 52)
- c. Implementation of best available erosion and sediment control measures during grading and construction activities, including sediment basins, gravel bags, silt fences, geo bags or gravel and geotextile fabric berms and other tools. (Mitigation Measure 5.10.3.D.2/ MPC Condition 53)
- d. Limitation of washing of construction vehicles and prohibition of discharging any polluted water or materials to the storm drain system or street. (Mitigation Measure 5.10.3.D.3/ MPC Condition 54)
- e. Application of seal coat only during dry weather and covering of storm drains and manholes during this time. (Mitigation Measure 5.10.3.D.4/ MPC Condition 55)
- f. Use of water saving mechanisms for indoor water use, including water efficient laundry and dishwashing facilities, lavatories and drinking fountains. (Mitigation Measure 5.10.3.D.5/ MPC Condition 57)

Mitigation measures including, but not limited to, the measures stated above have been found to mitigate water quality impacts to less than significant levels.

1.5.13 Recreation

The Coral Casino project proposes construction of a new ramp, west of the Coral Casino western gate, which would connect to Biltmore Beach and be accessible per the Americans with Disabilities Act standards. Potential loss of lateral beach area to accommodate this ramp would be considered adverse, but less than significant. The creation of the accessible ramp, along with recordation of a vertical

casement that would connect with an existing lateral beach easement, is considered a beneficial impact of the project. Therefore, no mitigation measures are required for this issue area.

1.5.14 Transportation

Physical improvements to the Coral Casino include the creation of a valet parking queue area at the northwest corner of the building to more smoothly accommodate special event parking need at the club. Operational changes proposed in the project (allowance for guests of registered overnight Biltmore Hotel guests to access the new restaurant, and recognition of reciprocal member uses of the club) would generate 20 average daily trips (ADT) and 1 PM peak hour trip. However, this traffic would be mitigated through the project's simultaneous loss of three lodging spaces known as "keys", or rooms, at the Biltmore Hotel. Therefore, the overall project related traffic would be reduced by 7 ADT, 2 AM peak hour trips and 1 PM peak hour trip.

Parking demand associated with the operational changes cited above would increase by one space, which will be provided at the Biltmore in the parking lot serving the "back of house" uses, or the northwest parking lot. This new space would increase the total parking on site serving the Biltmore Hotel and Coral Casino from 454 spaces to 455 spaces. Peak parking demand occurs 3-5 times annually, when the hotel experiences 100% occupancy at the same time as many events are booked at the combined Biltmore and Coral Casino facilities. During these times, a parking demand of 432 in the afternoon, to 561 parking spaces in the evening, was identified in the EIR (Table 5.12-10, page 191). With additional valet services, the onsite parking supply could be increased by 49 spaces to a total of 504 on site spaces. This would leave a remaining parking deficiency of 57 spaces during peak demand periods which occur 3-5 times per year.

Such a deficiency has existed for over 25 years, based on the prior acknowledgement by the County and California Coastal Commission in its approval of 78-CP-014, authorizing an addition of hotel rooms and parking spaces. As noted in the EIR, Section 5.12.3.G (p. 186 of FEIR), The Coastal Commission, in approving Coastal Development Permit # 4-82-5/31909, recognized that a parking deficiency of 125 spaces would remain after the project, and following the provision of 454 parking spaces as required by 78-CP-014. During such busy periods, the hotel and club operators also implement increased incentives for employees to use alternative means of transportation or carpool to lessen staff use of the onsite parking supply, and will continue to do so under the revised Development Plan.

Mitigation

- a. Continued compliance with the conditions of approval carried forward from 98-CP-031 AM01, including specification of the number of Biltmore hotel guest rooms, Coral Casino memberships, and number of parking spaces; continued compliance in scheduling Hotel and Coral Casino activities to coincide with off-peak traffic and beach utilization periods, continued compliance with requiring reservations for Sunday Brunch; implementation of valet parking during specific events and prohibition of parking lot area use for special event staging areas. (MPC Conditions 1, 3, 4, 5, 15 - 22)
- b. Implementation of a construction period parking management plan and use of traffic control monitors during construction. (Mitigation Measure 5.12.5.B.1 & 2/ MPC 60 and 61)
- c. Limitation of indoor and outdoor seating capacity at the Coral Casino's second story restaurant to 97 (and up to 113) indoor seats, and 62 seats outdoors. (Mitigation Measure 5.12.5.B.3/ MPC Condition 62)
- d. Implementation on a long term basis of an operational parking plan, and collection of parking data after the first year of operation, for filing with County P&D and forwarding to the MPC as an informational item. (Mitigation Measure 5.12.5.B.4/ MPC condition 63)

- c. Preparation of a compliance report listing the number of members, member events, special events, fundraisers by outside groups, conference groups using the Coral Casino and the number of people using the new second story restaurant. The compliance report will be filed with P&D staff, and provided as information to the MPC. (MPC Condition 64)

Mitigation measures including, but not limited to, the measures stated above have been found to mitigate traffic, circulation and parking impacts to less than significant levels

1.6 FINDINGS THAT IDENTIFIED PROJECT ALTERNATIVES ARE NOT FEASIBLE

The Final EIR, 04-EIR-00000-00006, prepared for the project evaluated a no project/routine maintenance alternative, two alternative designs, and an alternative location as methods of reducing or eliminating potentially significant environmental impacts. These alternatives are infeasible for the following reasons:

1.6.1. No Project/Routine Maintenance Alternative

This alternative would achieve none of the project objectives and would forego all the project's benefits, itemized in the Statement of Overriding Considerations, and is therefore rejected.

1.6.2. Alternative F Redesign

Alternative F was identified by the applicant as an option that met some of the project objectives, including removal of the non-historic La Perla Circle addition and the entire La Perla Restaurant addition. This alternative would locate the replacement restaurant primarily in the existing bar and members' lounge area, and relocate these uses to the base of the tower. Alternative F would also provide new restrooms at the western edge of the La Pacifica ballroom (Banquet Room), and locate an expanded kitchen in the basement. While this alternative would reduce many impacts due to the omission of the second story restaurant, it could result in other impacts to the historic building by virtue of increased excavation needed to accommodate the kitchen in the basement.

Alternatives under CEQA are supposed to attain most of a project's basic objectives and avoid or substantially lessen the project's significant effects. The project's goals and objectives are set forth in Section 4.4, page 61 of the Final EIR as follows:

1. To rehabilitate the Coral Casino. The Club is in need of repairs, due to its age and proximity to the ocean which has taken its toll on the structural elements of the site. A comprehensive rehabilitation of the Coral Casino is required in order to preserve the building, address long-standing deferred maintenance and correct ill-designed additions that have occurred in the past which compromise the building's integrity.
2. To provide a first-class recreational experience, amenities and social functions that are typical of this beach club facility and that have historically been provided and required by a contractual obligation with members.
3. To return to the historic vision for the Coral Casino by removing certain building elements that compromise the original design of Gardner Dailey.
4. To provide a second-floor restaurant offering a first-class dining experience, and views of the Pacific Ocean, in place of the existing first floor dining area. The applicant has also indicated that it is necessary to have a kitchen on the same floor as the restaurant to provide the multi-star rating sought by the owner.

In the process of formulating the project, the applicant compiled a list of required uses for the Coral Casino Rehabilitation Project from three sources: (1) all uses contained in the original Gardner Dailey design; (2) uses that have been added over time; and (3) new elements required by current codes and

ordinances. These uses are set forth in Appendix A to David Van Hoy's letter of June 29, 2005 to the Board of Supervisors. As set forth below, Alternative F fails to meet many of the goals and objectives of the project and does not provide many of the required uses:

1. The original Coral Casino dining room had views from all seats. The majority of dining room seats in Alternative F will not have a view of the ocean. The northern half of the room has no windows. From the southern half of the dining room views are limited to the pool area on the east and views to the south are blocked by the yoga area, historic clock tower, and pool bar. The seating capacity is significantly less than the existing dining room.
2. The original dining room also had an enclosed open-air courtyard, which provided access to the sun and protection from the sea breeze. Alternative F does not provide a courtyard.
3. Alternative F's proposed dining room restrooms are inadequate in size and will require members and guests to traverse the banquet room to use the facilities.
4. Alternative F proposed the bar and lounge in the same plan location as the historic bar, however this area has been remodeled to become a windowless room with no light or view since the adjacent banquet room was created in 1958.
5. No additional kitchen or restroom space was provided when the banquet room was originally created. The specialized equipment required for large production banquet cooking is completely separate from the equipment required for an a-la-carte dining room. Alternative F proposes that the kitchen be located in a new basement. This location creates operational difficulties because of its distance from the dining room.
6. The construction of this new basement called for in Alternative F will cause additional stress and potential harm to the historic structure during construction, and may require partial demolition of the western wing of the existing building.
7. A major design element of the Coral Casino Rehabilitation Plan is the separation of member and non-member activities on-site. Alternative F does not separate member and non-member activities and does not provide for a guest entrance to the dining room, which are objectives of the project.
8. Alternative F proposes the removal of the existing exercise room addition but does not identify a new or replacement location.
9. Alternative F eliminates the existing private member lounge.
10. Alternative F does not provide a new location for the multi-purpose room which is displaced by the proposed bar/lounge.
11. Alternative F proposes the removal of the existing private members dining room, but no new location is identified for this element.
12. Alternative F does not provide for second level restrooms.
13. Alternative F does not provide for required ADA accessibility to the upper level or the proposed new basement functions.

In summary, Alternative F is incomplete, does not provide for many of the required functions and spatial relationships, does not meet the project goals and objectives and for these reasons is found to be infeasible and is therefore rejected.

1.6.3 Levikow/CCPC Alternative

The Levikow/CCPC alternative removes the non-historic La Perla Circle addition and half of the La Perla Restaurant addition, and places the relocated restaurant in the existing Bar and Member's Lounge. The Bar and Lounge function would move to the base of the tower (similar to Alternative F). The kitchen would remain in the same location, and be slightly enlarged by incorporation of areas now used for table and chair storage, a few new restrooms would be added adjacent to the kitchen, and the storage function would be relocated to the basement, along with additional restrooms, but without accessible elevators. Storage is also suggested to move offsite in this alternative. The entrance for banquet room functions would remain from the west end of the building under this Alternative.

Alternatives under CEQA are supposed to attain most of a project's basic objectives and avoid or substantially lessen the project's significant effects. The project's goals and objectives are set forth in Section 4.4, page 61 of the Final EIR as follows:

1. To rehabilitate the Coral Casino. The club is in need of repairs due to its age and proximity to the ocean, which has taken its toll on the structural elements of the site. A comprehensive rehabilitation of the Coral Casino is required in order to preserve the building, address long-standing deferred maintenance and correct ill-designed additions that have occurred in the past which compromise the building's integrity.
2. To provide a first-class recreational experience, amenities and social functions that are typical of this beach club facility and that have historically been provided and required by a contractual obligation with members.
3. To return to the historic vision for the Coral Casino by removing certain building elements that compromise the original design of Gardner Dailey.
4. To provide a second floor restaurant offering a first-class dining experience, and views of the Pacific Ocean, in place of the existing first floor dining area. The applicant has also indicated that it is necessary to have a kitchen on the same floor as the restaurant to provide the multi-star rating sought by the owner.

In the process of formulating the project, the applicant compiled a list of required uses for the Coral Casino Rehabilitation Project from three sources: (1) all uses contained in the original Gardner Dailey design; (2) uses that have been added over time; and (3) new elements required by current codes and ordinances. These uses are set forth in Appendix A to David Van Hoy's letter of June 29, 2005 to the Board of Supervisors.

The Levikow/CCPC alternative floor plan describes only the western half of the main level of the Coral Casino which constitutes approximately 25% of the club. The CCPC Alternative does not provide a design for the remaining 75% of the facility. This leaves the resolution of the majority of the required program elements unresolved. No exterior elevation drawings are provided to illustrate the proposed design. The Levikow/CCPC Alternative fails to meet many of the goals and objectives of the project and does not provide many of the required uses as set forth below:

1. The original Coral Casino dining room had views from all seats. The majority of dining room seats in the CCPC alternative will not have a view of the ocean. The northern half of the room has no windows. From the southern half of the dining room views are limited to the pool area on the east and views to the south are blocked by the yoga area, historic clock tower, and pool bar, leaving only one or two windows on the west with an ocean view.
2. The original dining room also had an enclosed open-air courtyard, which provided access to the sun and protection from the sea breeze. The CCPC plan does not provide a courtyard.

3. The CCPC's proposed location of the dining room continues the status quo of a non-historic addition which blocks western views from the pool area, occupies space originally designed for pool related activities, and ignores the original historic building footprint.
4. The CCPC's proposed dining room restrooms are inadequate in size and will require members and guests to traverse the banquet room to use the facilities.
5. The CCPC Alternative proposes the bar and lounge in the same plan location as the historic bar, however this area has been remodeled to become a windowless room with no light or view since the adjacent banquet room was created in 1958.
6. No additional kitchen or restroom space was provided when the banquet room was originally created. The specialized equipment required for large production banquet cooking is completely separate from the equipment required for an a-la-carte dining room. The CCPC plan increases the space available for the kitchen, but does not create enough for the required equipment.
7. The CCPC Alternative proposes to provide banquet storage in a new basement creates operational difficulties and will require a large freight elevator, which is not shown on the plan. Incorporation of the freight elevator will further reduce the space available for the kitchen.
8. The CCPC's Alternative calls for locating banquet restrooms in a new basement, which is impractical given the restrooms must serve the 1st floor banquet room, which has a 300-person occupancy capacity.
9. In addition, the construction of the new basements called for by the CCPC plan will cause additional stress and potential harm to the historic structure during construction, and may require partial demolition of the western wing of the existing building.
10. A major design element of the Coral Casino Rehabilitation Plan is the separation of member and non-member activities on-site. The CCPC plan continues the conflicts that exist today, and does not provide for a guest entrance to the dining room, which is an objective of the project.
11. The CCPC's Alternative plan eliminates the existing exercise room addition, but does not identify a new location.
12. The CCPC's Alternative plan eliminates the existing private member lounge.
13. The CCPC's Alternative plan does not provide a new location for the multi-purpose room which is displaced by the proposed bar/lounge.
14. The CCPC's Alternative plan proposes to remove the existing private members' dining room, but does not identify a new location for this element.
15. The CCPC's Alternative plan does not provide for second level restrooms.
16. The CCPC's Alternative plan does not provide for required ADA accessibility to the upper level or the proposed new basement functions.

In summary, the Levikow/CCPC Alternative is incomplete, does not provide for many of the required functions and spatial relationships, does not meet the project goals and objectives and for these reasons is found to be infeasible and is therefore rejected.

1.6.4. Alternative Site Project Size

Provision of some of the project objectives, including the second story ocean view restaurant, may be realized at an alternative site. One such alternative location is the Biltmore Hotel, also owned by Ty Warner Hotels and Resorts. The Biltmore currently has an ocean view first floor restaurant, set back from Channel drive against an expanse of lawn. An addition to this portion of the structure may compromise the architectural or historic integrity of this alternative location. Additionally, due to the site specific nature and relation of some of the project objectives to members of the Coral Casino Beach and Cabana Club, provision of another restaurant off site would not meet several other primary project objectives, such as the *comprehensive* rehabilitation of the Coral Casino facility, and provision of a second floor ocean view restaurant. Therefore, this alternative is infeasible and is also rejected.

1.7. STATEMENT OF OVERRIDING CONSIDERATIONS

The Final EIR for the Coral Casino identifies project impacts to Historic Resources as significant environmental impacts which are considered unavoidable. The Board of Supervisors therefore makes the following Statement of Overriding Considerations which warrants approval of the project notwithstanding that all identified impacts are not fully mitigated. Pursuant to CEQA Sections 15043, 15092 and 15093, any remaining significant effects on the environment, including cumulative impacts are acceptable due to the following overriding considerations:

1.7.1. Historical Resources Benefits.

- a. The Project will cause the rehabilitation of an historical landmark that is in need of repair and structural upgrades.
- b. The Project will cause the replacement of two cabanas constructed when the Coral Casino was originally built but removed during one of the subsequent remodels.
- c. The Project will result in the reinforcement of the historic tower structure.
- d. The Project will cause the Coral Casino building to be in full compliance with Americans with Disabilities Act standards.
- e. The Project will result in the removal of non-historic additions such as a second story fitness room, La Perla Circle and La Perla dining room.
- f. The removal of the La Perla Circle and the La Perla dining room addition will restore and recapture the original Gardner Dailey historic views of the ocean from the pool, deck and second floor cabanas.
- g. The Project will restore the historic bar area next to the clock tower.
- h. The Project will result in the restoration of historic landscape features.
- i. The Project will restore a portion of the sundeck and railings that were removed when the non-historic fitness room was added.

1.7.2. Environmental Benefits.

- a. The Project will result in the removal of all asbestos in the Coral Casino's buildings.
- b. The Project will result in a reduction of traffic due to the reduction of three (3) keys at the Biltmore Hotel, ensuring no significant increases in traffic would occur, and the project would be consistent with circulation policies. An improvement to on site parking supply,

and continuation of parking management strategies would be ensured with the project, addressing long-term parking deficiencies in the area.

- c. The Project will replace, upgrade and modernize the utility infrastructure for safety and efficiency, thereby conserving electricity, water and gas consumption.
- d. The Project will provide a pull-out area adjacent to the existing stone entry gate to be removed and reconstructed.
- e. The Project will improve water quality through the upgrading and diversion of existing drainage patterns such that off- and on-site surface runoff (including water on and around the pool deck) would be redirected to the storm drain system, and that pool water discharge will be treated with improved filtering systems and directed to the Montecito Sanitary District wastewater treatment facilities.
- f. The Project will cause the reduction of 687 square feet of meeting space thereby resulting in potentially fewer people at meetings and vehicle trips associated with that function.
- g. The Project will result in the removal of existing noisy roof-top equipment and the reduction of 60% of the heat extract (cooling capacity) off-site via the existing Biltmore central cooling plant.
- h. The Project will result in the removal of the terry cloth laundry which will further reduce the concentration of equipment and hot air exhaust on site.

1.7.3 Aesthetic Benefits.

- a. The Project will cause the concealment of the delivery area.
- b. The Project will restore historic landscape features.
- c. The Project will result in the repair of substantial deferred maintenance which, if left unattended, would cause significant damage to the historically designated portions of the Coral Casino buildings.

1.7.4 Recreation and Visitor Serving Benefits.

- a. The Project will result in the construction of an accessible ramp access to the beach in full compliance with the accessibility provisions of the California Building Code. An offer to dedicate public access over the ramp to the beach below will be provided.
- b. The Project will result in the provision of elevator service to the basement and second floor.
- c. The Project will result in the addition of bathrooms to the banquet facilities.
- d. The Project will be accomplished without any interference with lateral beach access routes.

1.7.5 Economic Benefits to Local Government.

- a. The new construction resulting from the rehabilitation of the Coral Casino's buildings will cause a reassessment of the improvements pursuant to the California Revenue and Taxation Code thereby resulting in increased property tax revenue to the County of Santa Barbara.

- b. The Project will create temporary construction jobs thereby benefiting the local economy.

1.7.6 Technological, Traffic, and Public Safety Benefits.

- a. The Project will result in improved fire access.
- b. The Project's buildings will be constructed to Uniform Building Code seismic zone 4 standards, or allowable standards contained within the State Historic Building Code.
- c. The Project's buildings will have improved noise insulation.
- d. The Project will cause the preparation of a Traffic Demand Management Plan.
- e. The Project will cause the preparation of a Parking Demand Management Plan.
- f. The Project will result in the storage of chemicals in a secure storage area.
- g. The Project will provide an additional parking stall in the "back-of-house" area on the Biltmore Hotel site.

1.8 ENVIRONMENTAL REPORTING AND MONITORING PROGRAM

Public Resources Code Section 21081.6 requires the County to adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of approval in order to mitigate or avoid significant effects on the environment. The approved project description and conditions of approval, with their corresponding permit monitoring requirements, are hereby adopted as the monitoring program for this project. The monitoring program is designed to ensure compliance during project implementation.

2.0 ZONING ORDINANCE FINDINGS

FINDINGS PURSUANT TO ARTICLE II, THE COASTAL ZONING ORDINANCE

2.1 FINDINGS REQUIRED FOR APPROVAL OF A DEVELOPMENT PLAN PURSUANT TO SECTION 35-174.7.1

A Development Plan shall only be approved if all of the following findings are made:

2.1.1 *That the site for the project is adequate in size, shape, location, and physical characteristics to accommodate the density and level of development proposed.*

The Biltmore and Coral Casino sites have been developed with hotel and recreational club uses for many decades and have received the review and approval of a variety of permits over the years as discussed in detail in the project EIR. The current operating permit 98-DP-031 AMOI was approved in February 2005. As part of that approval, the above finding was made by the Board of Supervisors regarding the sites' appropriateness for the density and level of development proposed. The proposed project includes no new development on the Biltmore Hotel site and only minimal new development on the Coral Casino site. As a result, the finding can still be made that the site is adequate in size, shape, location, and physical characteristics to accommodate the density and level of development proposed.

2.1.2 *That adverse impacts are mitigated to the maximum extent feasible.*

All of the EIR mitigation measures have been incorporated into the project conditions of approval. These include measures identified in the EIR to reduce significant impacts to less than significant levels, as well as measures designed to minimize impacts identified as adverse, but less than significant. The remaining Class I significant unmitigable impacts will be addressed through decisionmakers' adoption of overriding considerations, provided in these findings. Additional review and requirements incorporated into the final grading, drainage, building and landscape plans in response to final plan review and sign-off by County departments and MBAR final approval will serve to further mitigate adverse impacts to the maximum extent feasible.

2.1.3 *That streets and highways are adequate and properly designed to carry the type and quantity of traffic generated by the proposed use.*

As identified in the EIR traffic section and the policy consistency discussion regarding circulation policies in section 6.2 of the staff report, the area street network is adequate and properly designed to carry the type and quantity of traffic generated by the project. Further, the project will cause a net reduction of 7 average daily trips, 2 AM peak hour trips and 1 PM peak hour trip due to the reduction of three keys at the Hotel.

2.1.4 *That there are adequate public services, including but not limited to fire protection, water supply, sewage disposal, and police protection to serve the project.*

Public services are currently serving the project site and would continue to provide service for the project as proposed, including, but not limited to treatment of swimming pool water by the Montecito Sanitary District, as the swimming pool water currently drains to the storm drain system.

2.1.5 *That the project will not be detrimental to the health, safety, comfort, convenience, and general welfare of the neighborhood and will not be incompatible with the surrounding area.*

The Biltmore and Coral Casino uses have existing in this neighborhood for nearly 70 years, prior to many of the residential uses established later. Further, the Biltmore and Coral Casino

operations have not been the subject of many complaints received by the County over the last ten years, indicating that on the whole, these institutions have been, and are expected to be, compatible with the surrounding neighborhood. The changes to the existing building and operational conditions would not significantly increase the level of activities documented in recent years at the Coral Casino.

2.1.6 That the project is in conformance with the applicable provisions of Article II and the Coastal Land Use Plan.

As discussed in the Issue Summary, Comprehensive Plan Consistency, and Ordinance Consistency sections of the April 20, 2005 MPC staff report, the project would be consistent with the applicable provisions of Article II and the Coastal Land Use Plan, including, but not limited to, the Montecito Community Plan. Modifications for the location of the proposed equipment well in the front yard setback and enclosure of the eastern alley are addressed in Finding 2.2.1 below.

2.1.7 That in designated rural areas the use is compatible with and subordinate to the scenic, agricultural and rural character of the area.

The project is not located within a rural area.

2.1.8 That the project will not conflict with any easements required for public access through, or public use of a portion of the property.

The project would remove existing concrete platforms existing along the beach below the Coral Casino, thereby improving lateral access along the beach. The project includes construction of a new accessible ramp to the beach and an offer to dedicate a public access easement will be given by the applicant. This "offer to dedicate" would connect to an existing lateral easement south of the seawall to the mean high tide line.

2.2 FINDINGS REQUIRED FOR A DEVELOPMENT PLAN MODIFICATION PURSUANT TO SECTION 35-174.8.1

In addition to the findings for Development Plans set forth in Sec. 35-174.7. (Development Plans), the Planning Commission or Board of Supervisors may modify setback requirements when justified by the project.

2.2.1 The Board of Supervisors finds that the project justifies a modifications the required front and side yard setbacks.

The proposed equipment well in the front yard setback is justified because it would be a minor extension of an existing access vent, would be used not more than once per year on average, and would be surrounded by landscaping that would screen the vent. The enclosure of the eastern alley is also justified because it would fill in a small alley that exists along the otherwise continuous length of this eastern facade of the building, which is not a highly visible side of the structure.

2.3 FINDINGS REQUIRED FOR APPROVAL OF A DEVELOPMENT PLAN IN THE C-V ZONE DISTRICT PURSUANT TO SECTIONS 35-81.4.1 AND 35-81.4.2.

In addition to the findings for Development Plans set forth in Sec. 35-174.7. (Development Plans), no Preliminary or Final Development Plan shall be approved for property zoned or to be rezoned to Resort/Visitor Serving Commercial unless the Planning Commission also makes the following findings:

- 2.3.1. *For development in rural areas as designated on the Coastal Land Use Plan Maps, the project will not result in a need for ancillary facilities on nearby land, i.e., residences, stores, etc.*

The project is not located in a rural area.

- 2.3.2. *For developments surrounded by areas zoned residential, the proposed use is compatible with the residential character of the area.*

The Biltmore and Coral Casino are long established and permitted uses within the neighborhood. The changes to the existing sites/permits would not substantially alter the existing level of development or activities on-site or within the surrounded residential area.

2.4. **ADDITIONAL FINDINGS REQUIRED FOR APPROVAL OF A DEVELOPMENT PLAN IN THE C-V ZONE DISTRICT PURSUANT TO SECTION 35-280.1**

- 2.4.1. *Improvements to resort visitor serving hotels have been designed to be consistent with the existing historic "Cottage Type Hotel" tradition from the early days of Montecito*

The proposed changes to the Coral Casino, in part a recreational component of the Biltmore, would provide repair and reconstruction to the aging historic facilities. The proposal would facilitate long-term preservation of this Historic Landmark from the "early days of Montecito."

- 2.4.2. *The facility is compatible in mass, bulk, scale, and design with the residential character of the surrounding neighborhoods.*

The surrounding neighborhood includes a variety of structures with regard to mass, bulk, scale and design. Besides the Biltmore and Coral Casino structures, residential development in the area varies, and includes multi-story, multi-unit condominiums, duplexes, smaller cottage type residences, as well as a number of large and visible estate residences. The appearance of the facility would not change substantially and would remain compatible with the residential character of the surrounding neighborhood.

2.5. **ADDITIONAL FINDINGS REQUIRED PURSUANT TO THE MON OVERLAY DISTRICT SECTIONS 35-215.1 AND 35-215.3.**

- 2.5.1. *In addition to the findings that are required for approval of a development project (as development is defined in the Santa Barbara County Coastal Plan), as identified in each section of Division 11 - Permit Procedures of Article II, a finding shall also be made that the project meets all the applicable development standards included in the Montecito Community Plan of the Coastal Land Use Plan.*

As discussed in the policy consistency section of the April 20 MPC staff report, section 6.2, the project would be consistent with all applicable development standards included in the Montecito Community Plan.

- 2.5.2. *For projects subject to discretionary review, a finding shall be made that the development will not adversely impact recreational facilities and uses.*

The project would remove existing concrete platforms located along the beach below the Coral Casino, thereby improving lateral access along the beach. The project would also provide a new accessible ramp to the beach and an offer to dedicate a public access easement will be given by the applicant.

ATTACHMENT B: CONDITIONS OF APPROVAL

Project Description

- 1. Proj Des-01 Project Description.** This Development Plan Amendment (22AMD-00000-00005) and Coastal Development Permit (22CDP-00000-00079) is based upon and limited to compliance with the project description, the hearing exhibits marked A-G, dated March 15, 2023, and all conditions of approval set forth below, including mitigation measures and specified plans and agreements included by reference, as well as all applicable County rules and regulations. Additionally, all conditions of approval on 03DVP-00000-00002 (as amended by 05AMD-00000-00005, 07AMD-00000-00011, and 13AMD-00000-00005) remain in effect with the exception of Condition Nos. 3 and 22, which are amended herein.

The proposed project is a request for an Amendment to the Biltmore Hotel and Coral Casino Revised Development Plan (03DVP-00000-00002) and approval of an associated Coastal Development Permit to modify Condition Nos. 3 and 22 of the Development Plan conditions of approval, as detailed below. Condition No. 3 will be modified to reduce the maximum number of permitted Biltmore Hotel guestrooms/keys to 192. Prior to Coastal Development Permit issuance, the Owner/Applicant shall provide site/floor plans to Planning and Development for review and approval. The site/floor plans shall depict the layout of existing Biltmore Hotel guestrooms and the proposed reduction in guestrooms to 192. The reduction in the existing number of Biltmore Hotel guestrooms will be accomplished with interior alterations only to combine adjacent separate guestrooms into singular, larger guestrooms (including suites and junior suites). Condition No. 22 will be modified to allow limited public use of the existing second floor Coral Casino Restaurant, reduce the Coral Casino monthly membership allowance for members of reciprocal clubs, and eliminate the Coral Casino seasonal membership allowance for Biltmore Hotel guests. Additionally, use of the existing 2,050-sq. ft. event/meeting room at the Biltmore Hotel (currently identified as the La Marina banquet room) will be limited to non-dining entertainment and other activities for hotel guests only. This proposed Amendment does not involve any new structural development or exterior alterations to existing development, and no additional services or access will be required. The property will continue to be served by the Montecito Water District, the Montecito Sanitary District, and the Montecito Fire Protection District. Access is provided from Channel Drive. The proposed project is located on a 19.28-acre property, zoned C-V and shown as Assessor's Parcel Numbers 009-352-009, 009-354-001, 009-351-012 and 009-353-015, located at 1260 and 1281 Channel Drive in the Coastal Zone of the Montecito Community Plan Area, First Supervisorial District.

Changes to 03DVP-00000-00002 Conditions of Approval (deleted text shown in strikethrough font and new text shown in underlined font):

3. *The number of guestrooms or keys shall not exceed ~~229~~192.*

22. *Coral Casino Conditions:*
 - a) *The Coral Casino shall remain a private club.*
 - b) *Guest membership shall be limited to:*
 - 1) *600 – permanent members*
 - 2) ~~*50 – seasonal members, for guest of the Biltmore Deleted*~~
 - 3) *Up to ~~120~~60 members per month from reciprocal clubs located at least 75 miles away from the Coral Casino*
 - c) *With the exception of the 2nd floor restaurant, regular use of the facility shall be limited to club members and their guests, and registered overnight Biltmore Hotel guests only. Guests of registered Biltmore Hotel guests may also use the second story restaurant when accompanied by the registered hotel guest. Such regular use also includes guest privileges afforded to the general manager of the club, for business purposes incidental to the operation of the club. Outside groups may use the facility for special functions. The 2nd floor restaurant shall be available for club members, member guests, and registered hotel guests, including 34 indoor seats reserved only for club members. In addition, the 2nd floor restaurant shall be available for up to 265 members of the public per day, by reservation. Reservation data shall be maintained by the operator and provided to County Planning and Development staff, upon request.*
 - d) *No outdoor music after 10:00 p.m. except Friday, Saturday, Fiesta week, and holidays, when music shall cease at 12:00 midnight.*
 - e) *Activities at the Coral Casino shall be those normally associated with a social, swim, and tennis club.*
 - f) *Use of the restaurant roof sundeck shall only be during daylight hours, through sunset, and during night time hours not more than four times annually.*

Any deviations from the project description, exhibits, or conditions must be reviewed and approved by the County for conformity with this approval. Deviations may require approved changes to the permit and/or further environmental review. Deviations without the above described approval will constitute a violation of permit approval.

2. **Proj Des-02 Project Conformity.** The grading, development, use, and maintenance of the property, the size, shape, arrangement, and location of the structures, parking areas and landscape areas, and the protection and preservation of resources shall conform to the project description above and the hearing exhibits and conditions of approval below. The property and any portions thereof shall be sold, leased or financed in compliance with this project description and the approved hearing exhibits and conditions of approval

thereto. All plans must be submitted for review and approval and shall be implemented as approved by the County.

County Rules and Regulations

- 3. Rules-02 Effective Date-Appealable to CCC.** This Coastal Development Permit shall become effective upon the expiration of the applicable appeal period provided an appeal has not been filed. If an appeal has been filed, the planning permit shall not be deemed effective until final action by the review authority on the appeal, including action by the California Coastal Commission if the planning permit is appealed to the Coastal Commission. [ARTICLE II § 35-169].
- 4. Rules-03 Additional Permits Required.** The use and/or construction of any structures or improvements authorized by this approval shall not commence until the all necessary planning and building permits are obtained.
- 5. Rules-05 Acceptance of Conditions.** The Owner/Applicant's acceptance of this permit and/or commencement of use, construction and/or operations under this permit shall be deemed acceptance of all conditions of this permit by the Owner/Applicant.
- 6. Rules-11 CDP Expiration-With CUP or DVP.** The approval or conditional approval of a Coastal Development Permit shall be valid for one year from the dated of decision-maker action. Prior to the expiration of the approval, the review authority who approved the Coastal Development Permit may extend the approval for one year if good cause is shown and the applicable findings for the approval required in compliance with Article II Section 35-169.5 can still be made. Prior to the expiration of a time extension noted above, the review authority who approved the time extension may approve two additional time extension for two years each if good cause is shown and the applicable findings for the approval required in compliance with Article II Section 35-169.5 can still be made. A Coastal Development Permit shall expire two years from the date of issuance if the use or structure for which the permit was issued has not been established or commenced in conformance with the effective permit.
- 7. Rules-23 Processing Fees Required.** Prior to issuance of the Coastal Development Permit, the Owner/Applicant shall pay all applicable P&D permit processing fees in full as required by County ordinances and resolutions.
- 8. Rules-30 Plan Requirements.** The Owner/Applicant shall ensure all applicable final conditions of approval are printed in their entirety on applicable pages of grading/construction or building plans submitted to P&D or Building and Safety Division. These shall be graphically illustrated where feasible.

- 9. Rules-32 Contractor and Subcontractor Notification.** The Owner/Applicant shall ensure that potential contractors are aware of County requirements. Owner/Applicant shall notify all contractors and subcontractors in writing of the site rules, restrictions, and Conditions of Approval and submit a copy of the notice to P&D compliance monitoring staff.
- 10. Rules-33 Indemnity and Separation.** The Owner/Applicant shall defend, indemnify and hold harmless the County or its agents or officers and employees from any claim, action or proceeding against the County or its agents, officers or employees, to attack, set aside, void, or annul, in whole or in part, the County's approval of this project.
- 11. Rules-35 Limits-Except DPs.** This approval does not confer legal status on any existing structures(s) or use(s) on the property unless specifically authorized by this approval.
- 12. Rules-37 Time Extensions-All Projects.** The Owner/Applicant may request a time extension prior to the expiration of the permit or entitlement for development. The review authority with jurisdiction over the project may, upon good cause shown, grant a time extension in compliance with County rules and regulations, which include reflecting changed circumstances and ensuring compliance with CEQA. If the Owner/Applicant requests a time extension for this permit, the permit may be revised to include updated language to standard conditions and/or mitigation measures and additional conditions and/or mitigation measures which reflect changed circumstances or additional identified project impacts.

ATTACHMENT C-1: EIR ADDENDUM

TO: Montecito Planning Commission

FROM: Gwen Beyeler, Supervising Planner
Development Review Division, Planning and Development
Staff Contact: Alia Vosburg

DATE: March 7, 2023

RE: State CEQA Guidelines Section 15164 Addendum for the Biltmore Hotel and Coral Casino Revised Development Plan Amendment, Case Nos. 22AMD-00000-00005 and 22CDP-00000-00079

CEQA DETERMINATION: Section 15164 of the State CEQA Guidelines applies to the Biltmore Hotel and Coral Casino Revised Development Amendment, Case Nos. 22AMD-00000-00005 and associated 22CDP-00000-00079. Section 15164 allows an addendum to a previously certified Environmental Impact Report (EIR) to be prepared when some changes or additions are necessary but none of the conditions described in Section 15162 of the State CEQA Guidelines have occurred. The EIR (04EIR-00000-00006) prepared for the Biltmore Hotel and Coral Casino Revised Development Plan (03DVP-00000-00002) is hereby amended by this EIR Addendum for Case Nos. 22AMD-00000-00005 and 22CDP-00000-00079.

Background

On July 5, 2005, the Board of Supervisors approved the Biltmore Hotel and Coral Casino Revised Development Plan (03DVP-00000-00002), and certified the Final EIR (04EIR-00000-00006). The Revised Development Plan allowed renovations and various additions to the Coral Casino, as well as related modifications to the Biltmore Hotel, including a reduction in the number of guestrooms/keys from 232 to 229 to offset the planned operations at the Coral Casino. The Revised Development Plan superseded all prior permits for the Biltmore Hotel and Coral Casino. The Final EIR evaluated the net change in environmental impacts between the specifically permitted uses allowed under the prior operating Development Plan (98-DP-031), against reasonable foreseeable impacts of the Revised Development Plan (03DVP-00000-00002). The EIR identified significant impacts on the environment with respect to historic resources and identified significant but mitigable impacts on the environment in the following categories: aesthetics/visual resources, air quality, archaeological resources, biological resources, geologic processes, land use, noise, transportation and parking, and water resources/drainage. Mitigation measure were adopted as conditions of approval on the Revised Development Plan.

Proposed Project

The proposed project is a request for an Amendment to the Biltmore Hotel and Coral Casino Revised Development Plan (03DVP-00000-00002) and approval of an associated Coastal Development Permit to modify Condition Nos. 3 and 22 of the Development Plan conditions of approval, as detailed below. Condition No. 3 will be modified to reduce the maximum number of permitted Biltmore Hotel guestrooms/keys to 192. Prior to Coastal Development Permit issuance, the Owner/Applicant shall provide site/floor plans to Planning and Development for review and approval. The site/floor plans shall depict the layout of existing Biltmore Hotel guestrooms and the proposed reduction in guestrooms to 192. The reduction in the existing number of Biltmore Hotel guestrooms will be accomplished with interior alterations only to combine adjacent separate guestrooms into singular, larger guestrooms (including suites and junior suites). Condition No. 22 will be modified to allow limited public use of the existing second floor Coral Casino Restaurant, reduce the Coral Casino monthly membership allowance for members of reciprocal clubs, and eliminate the Coral Casino seasonal membership allowance for Biltmore Hotel guests. Additionally, use of the existing 2,050-sq. ft. event/meeting room at the Biltmore Hotel (currently identified as the La Marina banquet room) will be limited to non-dining entertainment and other activities for hotel guests only. This proposed Amendment does not involve any new structural development or exterior alterations to existing development, and no additional services or access will be required. The property will continue to be served by the Montecito Water District, the Montecito Sanitary District, and the Montecito Fire Protection District. Access is provided from Channel Drive. The proposed project is located on a 19.28-acre property, zoned C-V and shown as Assessor's Parcel Numbers 009-352-009, 009-354-001, 009-351-012 and 009-353-015, located at 1260 and 1281 Channel Drive in the Coastal Zone of the Montecito Community Plan Area, First Supervisorial District.

Changes to Conditions of Approval (deleted text shown in strikethrough font and new text shown in underlined font):

3. *The number of guestrooms or keys shall not exceed ~~229~~192.*

22. *Coral Casino Conditions:*
 - a) *The Coral Casino shall remain a private club.*
 - b) *Guest membership shall be limited to:*
 - 1) *600 – permanent members*
 - 2) ~~50 – seasonal members, for guest of the Biltmore Deleted~~
 - 3) *Up to ~~120~~60 members per month from reciprocal clubs located at least 75 miles away from the Coral Casino*
 - c) *With the exception of the 2nd floor restaurant, regular use of the facility shall be limited to club members and their guests, and registered overnight Biltmore Hotel guests only. ~~Guests of registered Biltmore Hotel guests may also use the second story restaurant when accompanied by the registered hotel guest.~~ Such regular use also includes guest privileges*

afforded to the general manager of the club, for business purposes incidental to the operation of the club. Outside groups may use the facility for special functions. The 2nd floor restaurant shall be available for club members, member guests, and registered hotel guests, including 34 indoor seats reserved only for club members. In addition, the 2nd floor restaurant shall be available for up to 265 members of the public per day, by reservation. Reservation data shall be maintained by the operator and provided to County Planning and Development staff, upon request.

- d) No outdoor music after 10:00 p.m. except Friday, Saturday, Fiesta week, and holidays, when music shall cease at 12:00 midnight.*
- e) Activities at the Coral Casino shall be those normally associated with a social, swim, and tennis club.*
- f) Use of the restaurant roof sundeck shall only be during daylight hours, through sunset, and during night time hours not more than four times annually.*

Changes in Project Impacts

The proposed Amendment (22AMD-00000-00005) to the Coral Casino and Biltmore Hotel Revised Development Plan (03DVP-00000-00002) requests modification of the Development Plan conditions of approval (Nos. 3 and 22) related to Coral Casino membership, use of the Coral Casino second floor restaurant, and the maximum number of permitted Biltmore Hotel guestrooms/keys. The requested Amendment does not include any new structural development or exterior alterations to existing development, and the requested changes will not result in a need for new or altered services. As such, the proposed Amendment will have no effect on aesthetics/visual resources, archaeological resources, biological resources, geologic processes, land use, and water resources/drainage. Changes in project impacts related to transportation and parking, air quality, and noise are discussed further in this Addendum. As discussed below, the proposed changes will not create any new significant effects or a substantial increase in the severity of previously identified significant effects.

I. Transportation and Parking

The EIR evaluated potential transportation impacts associated with temporary construction traffic and parking, as well as permanent operational traffic and parking. The EIR concluded that potentially significant transportation and parking impacts may result from the Revised Development Plan, but these impacts would be reduced to a level of less than significance through required mitigation. The identified mitigation measures were adopted as conditions on the Revised Development Plan, and these conditions will remain applicable under the proposed Amendment. A detailed discussion of the changes in transportation and parking impacts resulting from the proposed Amendment is provided below, broken down by impact area. In summary, transportation impacts will remain less than significant under the proposed Amendment and EIR's analysis remains adequate.

Temporary Construction Traffic and Parking

The proposed Amendment does not include any new structural development or exterior alterations to existing development. Under the scope of the proposed Amendment, the reduction in the existing number of Biltmore Hotel guestrooms will be accomplished with minor interior alterations only to combine adjacent separate guestrooms into singular, larger guestrooms. Any temporary construction traffic and parking associated with the minor interior guestroom alterations would be minimal in nature due to the limited scope of alterations and would be mitigated through ongoing application of the existing mitigation measures identified in the EIR and adopted in the Revised Development Plan conditions (Condition Nos. 60 and 61). Therefore, transportation impacts associated with temporary construction traffic and parking will remain less than significant under the proposed Amendment and EIR's analysis remains adequate.

Permanent Operational Traffic

The proposed Amendment will result in a net decrease in traffic and parking demand associated with the Biltmore Hotel and Coral Casino operations, and the existing and ongoing operational traffic and parking demand will be further mitigated by existing Development Plan conditions.

As discussed above, the EIR evaluated the net change in environmental impacts between the specifically permitted uses allowed under the prior operating Development Plan, 98-DP-031, against reasonable foreseeable impacts of the Revised Development Plan, 03DVP-00000-00002. The scope of Revised Development Plan included a reduction in the number of Biltmore Hotel guestrooms/keys, and the EIR identified a traffic reduction of -7 Average Daily Trips (ADT), -2 AM Peak Hour Trips (PHT), and -1 PM PHT as a result of the Revised Development Plan. Although the EIR did not identify a significant impact associated with operational traffic, the EIR included a recommended mitigation measure involving development of a Transportation Demand Management Program to address the Revised Development Plan's potential addition to cumulative air quality impacts (discussed further below). This mitigation measure was adopted as Condition No. 34 of the Revised Development Plan's conditions, and will remain applicable under the proposed Amendment.

The proposed Amendment will modify the Revised Development Plan's conditions to allow limited public use of the existing second floor Coral Casino restaurant. Currently, the Coral Casino restaurant is limited to use by club members, club member guests, registered Biltmore Hotel guests, and guests of registered Biltmore Hotel guests, as provided in Condition No. 22 of the Revised Development Plan conditions. Due to the existing limitations on the type of patrons that have access to the Coral Casino restaurant, the restaurant has been operating below its permitted capacity. Condition No. 62 of the Revised Development Plan establishes the maximum number of seats associated with the Coral Casino restaurant¹. Under the proposed Amendment,

¹ Condition No. 62 states: *Indoor restaurant seating in the new second story restaurant, including the member's dining room, private dining room, bar and lounge areas and regular restaurant seating, shall not exceed 97 seats at any given time, and up to 113 seats for peak events. Outdoor dining area shall not exceed 62 seats associated with restaurant service (not including cabana, Raft, or pool deck lounge service).*

the maximum number of restaurant seats, as established by Condition No. 62, will remain unchanged. However, the proposed Amendment will modify Condition No. 22 with respect to the *types* of patrons that have access to the existing Coral Casino restaurant seats. Under the proposed Amendment, existing restaurant seats will be made available to up to 265 members of the public per day by reservation. Additionally, under the proposed Amendment, guests of registered Biltmore Hotel guests (which were previously allowed access to the restaurant) would be considered members of the public (i.e., counted as part of the allotted 265 members of the public per day maximum).

Associated Transportation Engineers (ATE) prepared an Updated Traffic, Parking, and VMT Analysis, dated June 10, 2022, and an Addendum, dated March 2, 2023, which evaluated the average daily trips (ADT) and peak hour trips (PHT) that would be generated by the proposed public use of the existing Coral Casino restaurant. As detailed in the ATE report, the proposed public use of the Coral Casino restaurant would generate approximately 172 new ADT and 18 new PM PHT. To offset the new ADT and PHT generated by the proposed public use of the restaurant, the proposed Amendment will also modify Condition No. 22 to reduce the Coral Casino monthly membership allowance for members of reciprocal clubs from 120 to 60, and modify Condition No. 3 to reduce the maximum number of Biltmore Hotel guestrooms or “keys” in the Development Plan entitlement from 229 to 192. As detailed in the ATE report, the proposed reduction in Coral Casino reciprocal memberships and the proposed reduction in the Biltmore Hotel key entitlement would result in a reduction of 300 ADT and 22 PM PHT. Accordingly, the net change as a result of the proposed Amendment is a reduction of 128 ADT and 4 PM PHT.

Additionally, in 2018, after certification of 04EIR-00000-00006, California Natural Resources Agency certified and adopted revisions to the State CEQA Guidelines that included new criteria for determining the significance of a project’s transportation impacts based on a Vehicle Miles Traveled (VMT) metric. Consistent with the revisions to the State CEQA Guidelines, the County adopted VMT screening criteria and thresholds of significance, against which project-level transportation impacts are evaluated. Projects meeting any of the screening criteria, absent substantial evidence to the contrary, will have less than significant VMT impacts and will not require further analysis. The proposed Amendment will result in a net decrease in ADT, and as such, meets the screening criteria for small projects (i.e., projects that generates 110 or fewer average daily trips).

In conclusion, transportation impacts associated with permanent operational traffic will remain less than significant under the proposed Amendment and EIR’s analysis remains adequate.

Permanent Operational Parking

Similarly, the ATE report evaluated parking demand that would be generated by the proposed public use of the existing Coral Casino restaurant. As detailed in the ATE report, the proposed public use of the Coral Casino restaurant would generate a new peak parking demand of

approximately 26 spaces. However, the proposed reduction in Coral Casino reciprocal memberships and the proposed reduction in the Biltmore Hotel key entitlement would result in a reduction in peak parking demand of approximately 64 spaces. Accordingly, the net change as a result of the proposed Amendment is a reduced peak parking demand of approximately 38 spaces.

In conclusion, impacts associated with permanent operational parking will remain less than significant under the proposed Amendment and EIR's analysis remains adequate.

II. Air Quality

The EIR evaluated potential cumulative air quality impacts associated with the Revised Development Plan. The EIR concluded that potentially significant air quality impacts may result from the Revised Development Plan, but these impacts would be reduced to a level of less than significance through required mitigation. The identified mitigation measure were adopted as a conditions on the Revised Development Plan, and these conditions will remain applicable under the proposed Amendment. Therefore no new opportunities for cumulative air quality impacts will be introduced as a result of the proposed Amendment and the EIR's analysis remains adequate.

III. Noise

The EIR identified potentially significant impacts to noise associated with temporary construction activities as well as long-term operational activities. The proposed Amendment does not include any new structural development or exterior alterations to existing development. Therefore, the proposed Amendment has no effect on noise associated with temporary construction activities.

Additionally, under the proposed Amendment, there will be no change to the number of restaurant seats or hours of operation. The existing mitigation measures and conditions prohibiting amplified outdoor music at the second story restaurant (mitigation measure adopted as Condition No. 47), and prohibiting all outdoor music after 10:00 p.m. except Friday, Saturday, Fiesta week, and holidays, when music shall cease at 12:00 midnight (Condition No. 22) will remain applicable. Therefore, the proposed Amendment has no effect on noise associated with long-term operational activities, and the EIR's analysis remains adequate.

Findings:

It is the finding of the Planning and Development Department that the proposed Amendment is within the scope of the previously certified EIR, and that the previous environmental document as herein amended may be used to fulfill the environmental review requirements of the current project. Because the current project meets the conditions for the application of State CEQA Guidelines Section 15164 and none of the conditions described in Section 15162 have occurred, preparation of a subsequent EIR is not required.

Coral Casino Renovations Amendment; Case Nos. 22AMD-00000-00005 and 22CDP-00000-00079

Hearing Date: March 15, 2023

Attachment C-1: EIR Addendum

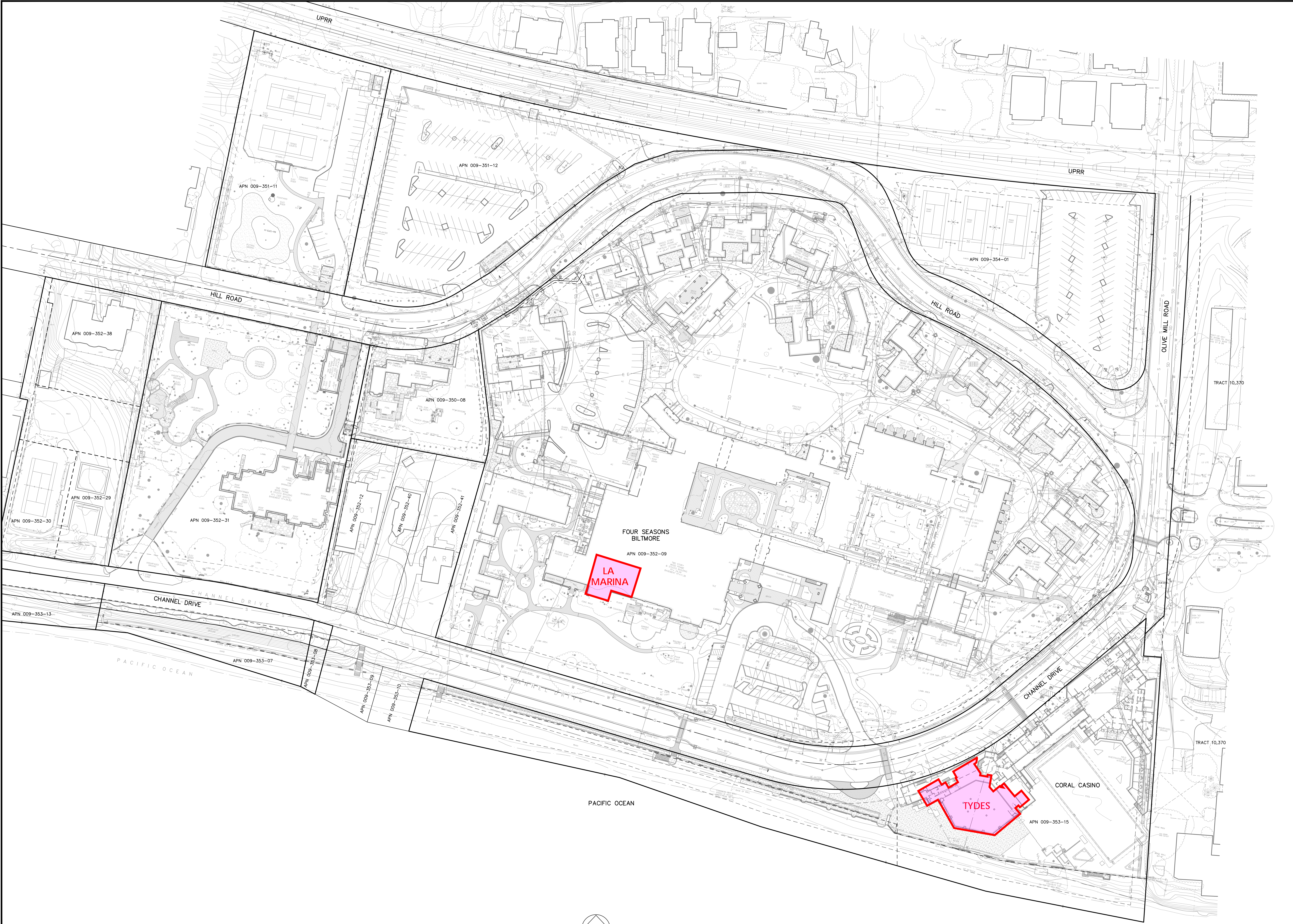
Page C-1-7

Discretionary processing of the Biltmore Hotel and Coral Casino Amendment Project, Case Nos. 22AMD-00000-00005 and 22CDP-00000-00079, may proceed with the understanding that any substantial changes in the proposal may be subject to further environmental review.

ATTACHMENT C-2: Link to 04EIR-00000-00006

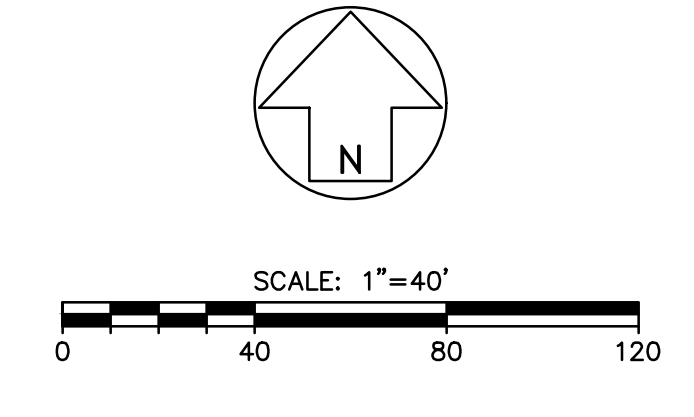
<https://cosantabarbara.app.box.com/s/sysqt6rgubd7d371bk5mfueu6k3vez91>

ATTACHMENT D: PROJECT PLANS



DESIGNED BY: GCS
 CHECKED BY: GCS
 PLOT DATE: 11/24/2021 8:40:47 AM
 PLOT BY: Gensick, Newby
 PLOT DATE: 11/24/2021 8:38:33 AM

FOR REDUCED PLANS
ORIGINAL SCALE IN INCHES



NO.	DATE	REVISION BLOCK	APPD.	PREPARED FOR:

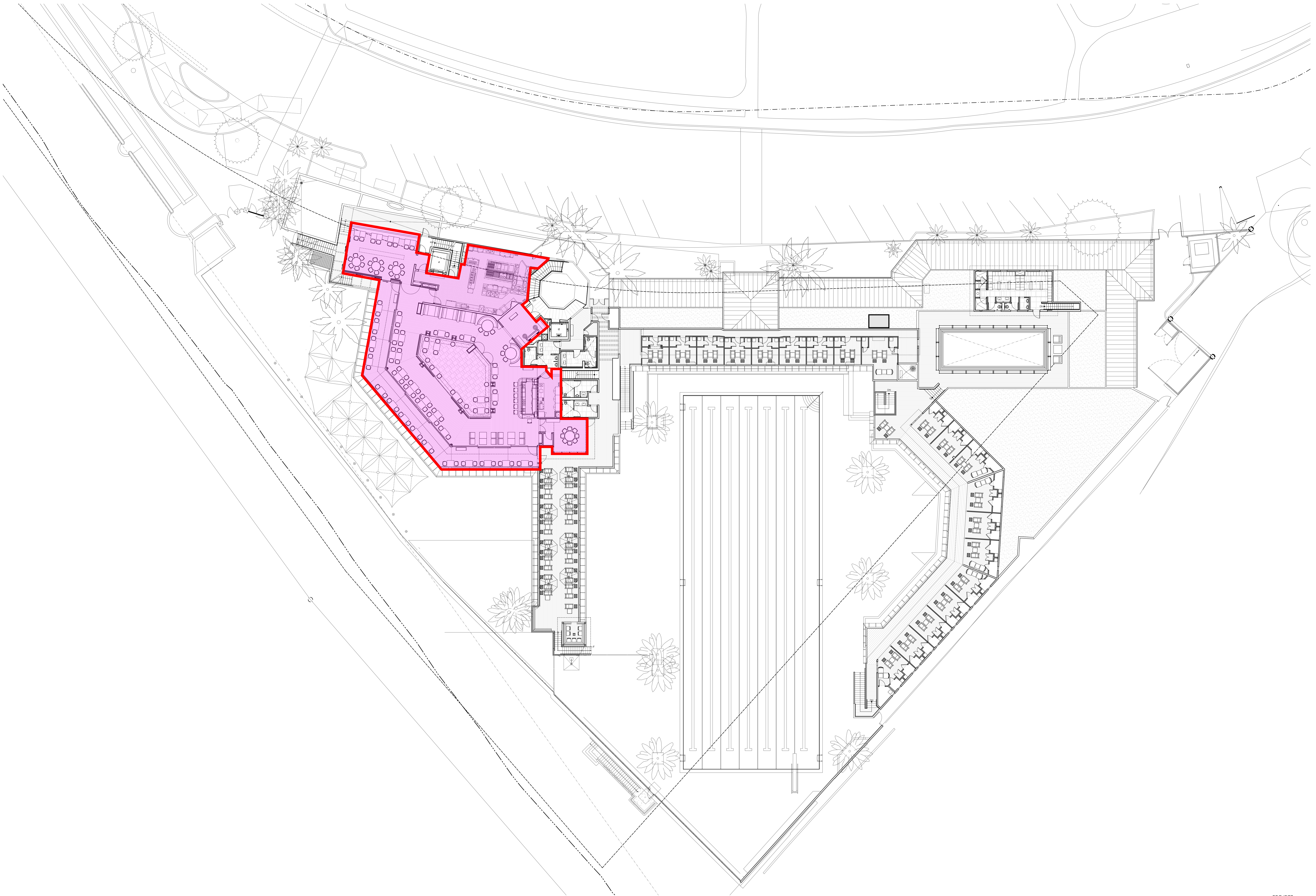
PREPARED BY:
Stantec
 200 East Corliss Street, Suite 101 Santa Barbara, CA 93101
 Phone: (805) 963-6532
 GUY D. SALTIS 60498
 PROJECT ENGINEER R.C.E. DATE

**FOUR SEASONS BILTMORE
 EXISTING TOPOGRAPHY**
 COUNTY OF SANTA BARBARA, CA

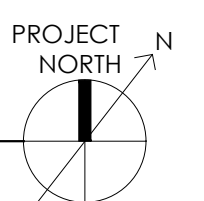
STANTEC PROJECT NO.
 2042821100
 SHEET
1 OF 1
 PLAN DATE
 11/24/2021

EXHIBIT

ATTENTION: IF THIS DOCUMENT IS PROVIDED AS A COURTESY IN AN ELECTRONIC FORMAT, THE DELIVERY OF THE ELECTRONIC FILE DOES NOT CONSTITUTE THE DELIVERY OF THE PROFESSIONAL WORK PRODUCT. ONLY A HARD COPY DOCUMENT THAT IS SIGNED AND SEALED BY AN AUTHORIZED PROFESSIONAL EMPLOYEE OF STANTEC CONSTITUTES THE PROFESSIONAL WORK PRODUCT. IN THE EVENT THE ELECTRONIC FILE IS ALTERED, THE HARD COPY MUST BE REFERRED TO FOR THE ORIGINAL AND CORRECT INFORMATION. STANTEC SHALL NOT BE RESPONSIBLE FOR ANY MODIFICATIONS MADE TO THE ELECTRONIC FILE, OR ANY PRODUCTS DERIVED FROM THE ELECTRONIC FILE WHICH ARE NOT REVIEWED, SIGNED AND SEALED BY AN AUTHORIZED PROFESSIONAL EMPLOYEE OF STANTEC. COPYRIGHT 2016, STANTEC CONSULTING SERVICES INC.



1 EXISTING SITE PLAN - SECOND LEVEL
SCALE 1/16" = 1'-0"



CORAL CASINO
1281 CHANNEL DRIVE, SANTA
BARBARA, CA 93108

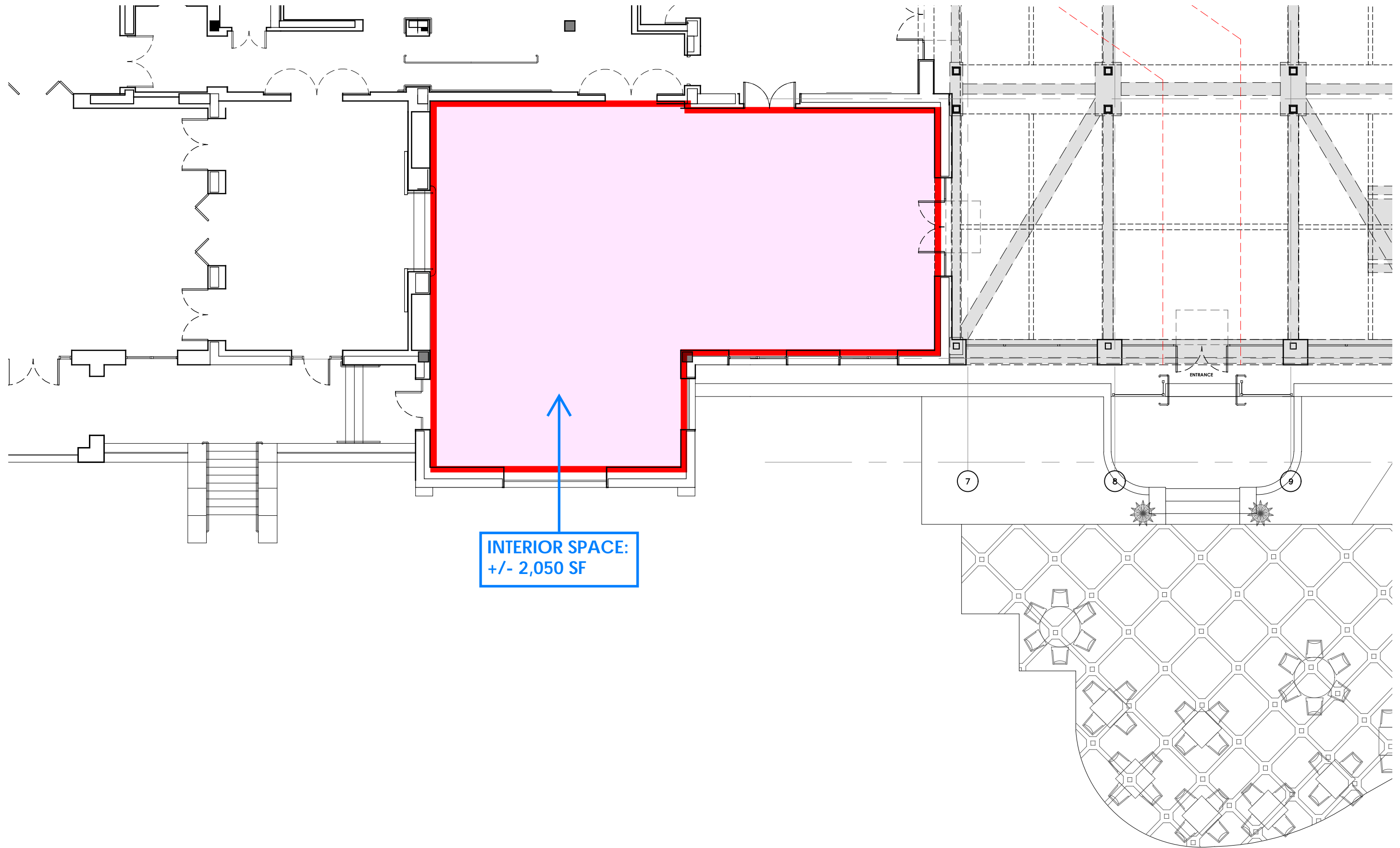
PROJECT NO. 30002

SCALE: AS SHOWN DATE: 08.08.2023 DRAWN BY: HPT

**SECOND LEVEL
FLOOR PLAN
TYDES RESTAURANT**

DRAWING NO.

A-201



INTERIOR SPACE:
+/- 2,050 SF

**ATTACHMENT E: ASSOCIATED TRANSPORTATION ENGINEERS (ATE) UPDATED
TRAFFIC, PARKING, AND VMT ANALYSIS, DATED JUNE 10, 2022**



ASSOCIATED TRANSPORTATION ENGINEERS

100 N. Hope Avenue, Suite 4, Santa Barbara, CA 93110 • (805)687-4418 • main@atesb.com

Since 1978

Richard L. Pool, P.E.
Scott A. Schell

June 10, 2022

21091L02

Steve Welton
SEPPS
1625 State Street, Suite 1
Santa Barbara, CA 93101

UPDATED TRAFFIC, PARKING AND VMT ANALYSIS FOR THE CORAL CASINO TYDES RESTAURANT DP AMENDMENT – SANTA BARBARA COUNTY

Associated Transportation Engineers (ATE) has prepared the following updated traffic, parking and Vehicle Miles Traveled (VMT) analysis for the Tydes Restaurant Development Plan (DP) Amendment (the “Project”), located in the Montecito area of Santa Barbara County. The study determines the Project’s consistency with Montecito Community Plan transportation policies, reviews the changes in parking demands generated by the Project, and provides an evaluation of potential CEQA impacts based on the Vehicle Miles Traveled (VMT) criteria adopted by the County.

PROJECT DESCRIPTION

The existing Tydes Restaurant is located on the 2nd floor of the Coral Casino Beach and Cabana Club which is located adjacent to the Biltmore Hotel on Channel Drive in Montecito as shown on Figure 1 (attached). The restaurant currently serves Coral Casino members and their guests, Biltmore Hotel guests, and guests of registered hotel guests. The applicant is requesting to amend Conditions #3 and #22 of the Approved Development Plan to allow limited public use of the of the Tydes Restaurant. The DP modification would allow up to 265 public guests per day at the restaurant (lunch and dinner service only), with 34 indoor seats permanently reserved for club members. The remaining portions of the Coral Casino Club would remain restricted to members and member guests only.

To offset any potential increase to traffic or parking from the use of the restaurant by the public, the Biltmore Hotel and Coral Casino have proposed additional modifications to Condition #22 as outlined below:

- Allow up to 265 public guests at the Tydes Restaurant (lunch and dinner only), with 34 indoor seats permanently reserved for club members.
- Reprogram 2,050 SF of Biltmore Hotel banquet space (La Marina) to a non-dining entertainment and activity area for hotel guests only.
- Reduce Coral Casino reciprocal members from 120/month to 60/month.
- Guests of registered Biltmore hotel guests would no longer be identified as a special class of user at the Coral Casino. These “guests of guests” would be considered members of the public and subject to the 265 per day limit.
- Remove the 50 seasonal memberships, for guests of the Biltmore.

Condition #3 of the Development Plan would also be revised in order to reflect the reduction on maximum room keys:

- 14 room keys would be removed from the Biltmore Hotel to bring the total from 229 to 215.

TRAFFIC ANALYSIS

Project Trip Generation

Trip generation estimates were developed for the various components of the Project based on operational data obtained from the hotel operators and data presented in the Institute of Transportation Engineers (ITE) Trip Generation Manual¹, as reviewed below.

Public Restaurant Guests. Average Daily Trip generation estimates for the 265 public restaurant guests were developed assuming an average vehicle occupancy (AVO) of 2.0 guests per vehicle. The data presented in the ITE Trip Generation Manual for Fine Dining Restaurants (Land Use Code #931) was used to develop the PM peak hour trip estimates.

La Marina Banquet Space. Trip generation estimates for the 2,050 SF of the La Marina banquet room that would be converted to hotel guest amenity space were developed using estimates of the number of event vehicles associated with this space (based on ULI parking rates). The analysis assumed that 55% of event participants would be non-hotel guests and that there would be 2 events per week.

¹ Trip Generation, Institute of Transportation Engineers, 11th Edition, 2021.

Reciprocal Members. Trip generation estimates for the reduction in reciprocal members from 120/month to 60/month assumed 2 member visits per day (60 visits per month/30 days = 2 visits per day).

Guests of registered Biltmore Hotel Guests. Trip generation estimates for the guests of Biltmore hotel guests who would no longer be identified as a special class of user at the Coral Casino were developed assuming 14 guests per day (consistent with the previous EIR analysis) and an AVO of 2.0 guests per vehicle.

Hotel Room Keys. Trip generation estimates for the Biltmore Hotel room keys that would be removed were developed using the ITE rates for Hotel (Land Use Code #310).

50 Seasonal Members. Trip generation estimates assumed that 15 guests per day who are no longer members would leave the property creating trips and reducing parking demands.

Table 1 summarizes the trip generation estimates developed for the Project (detailed trip generation spreadsheet attached). It is noted that the analysis focuses on the average daily and PM peak hour periods as the public guests would be limited to lunch and dinner service, and thus would not generate AM peak hour trips.

**Table 1
Project Trip Generation**

Land Use	Use Per Day/Size	AVO	ADT		PM Peak Hour	
			Rate	Trips	Rate	Trips
Proposed						
Restaurant Public Guests (a)	265 Guests	2.0	2.00	265	11%	29
Removed						
Reciprocal Members (b)	2 Members	1.0	2.00	4	11%	0
Guests of Hotel Guests (a)	14 Guests	2.0	2.00	14	11%	2
La Marina Banquet (c)	2,050 SF		2.00	28	11%	3
Hotel (d)	14 Keys		7.99	112	0.59	8
Seasonal Members (e)	15 Members	2.0	2.00	<u>15</u>	11%	<u>2</u>
Total				173		15
Net Total				92		14

- (a) PM Peak Hour assumes 11% of ADT based on ITE Rates ($0.28 / 2.6 = 11\%$).
- (b) Assumes 2 members per day ($60 / 30 = 2$)
- (c) Assumes 34 vehicles, 55% non-hotel guests and 2 events per week.
- (d) Trip generation based on ITE rates for Hotels (Land Use Code #310).
- (e) Assumes 15 members per day

As shown in Table 1, the modifications to Conditions #3 and #22 would generate 92 average daily trips (ADT) and 14 PM peak hour trips.

PROJECT TRIP DISTRIBUTION

The trip distribution pattern and assignment developed for the Project is based on a general knowledge of the local street network and travel patterns, existing land uses, traffic flows in the area, and distribution patterns presented in other traffic studies. Table 2 summarizes the trip distribution and percentage for Project traffic and Figure 2 (attached) shows the assignment of Project traffic to the study-area street network.

Table 2
Project Trip Distribution

Origin/Destination	Direction	Percentage
US Highway 101	North (a)	75%
	South (b)	15%
Olive Mill	North	10%
Total		100%

- (a) 75% Inbound via Spring Road
 10% Outbound via Coast Village Road
 65% Outbound via Channel Drive – Cabrillo Boulevard
 (b) 15% via Olive Mill Road / US 101 Interchange

THRESHOLDS OF SIGNIFICANCE

The thresholds used to assess the consistency of project-generated traffic with County policies are based on the standards contained in the Montecito Community Plan. The thresholds used to assess the consistency of project-generated traffic with City of Santa Barbara policies are based on the standards contained in the Traffic Management Plan.

Santa Barbara County Thresholds

The Montecito Community Plan (MCP) Circulation Element policies regarding roadway capacities and intersection operations are listed below.

MCP Policy Standards

Roadway Standards:

1. For roadways where the Estimated Future Volume does not exceed the Acceptable Capacity, a project would be considered consistent if the number of ADT contributed by the project would not cause an exceedance of Acceptable Capacity.
2. For roadways where the Estimated Future Volume exceeds the Acceptable Capacity but does not exceed Design Capacity, a project would be considered consistent with this section of the Community Plan only if the number of ADT contributed by the project to the roadway does not exceed 25 ADT.

3. For roadways where the Estimated Future Volume exceeds the Design Capacity, a project would be considered consistent with this section of the Community Plan only if the number of ADT contributed by the project to the roadway does not exceed 10 ADT.

Intersection Standards:

1. Projects contributing Peak Hour Trips to intersections that operate at a Estimated Future Levels of Service A shall be found consistent with this section of the Community Plan unless the project results in a change in V/C ratio greater than 0.15.
2. For intersections operating at an estimated future Level of Service B that is less than or equal to LOS B, a project must meet the following criteria in order to be found consistent with this section of the Community Plan (except for the intersection of Hot Springs and East Valley).
 - For intersections operating at an estimated future Level of Service B, no project shall result in a change in V/C ratio greater than 0.10.
 - For intersections operating at an estimated future Level of Service C, no project shall contribute more than 15 Peak Hour Trips.
 - For intersections operating at an estimated future Level of Service D, no project shall contribute more than 10 Peak Hour Trips.
 - For intersections operating at an estimated future Level of Service E or F, no project shall contribute more than 5 Peak Hour Trips.

City of Santa Barbara Standards

The policies presented in the City's Traffic Management Strategy state that a significant project-specific traffic effect would result when a project's net peak-hour traffic generation would constitute one percent (0.01) or more of a signalized intersection's capacity (V/C) at one or more of the following intersections, (or one second or more delay time in the case of unsignalized intersections or roundabouts).

- | | |
|---|--|
| <ol style="list-style-type: none"> 1. Olive Mill & Coast Village 3. Milpas & Quinientos 5. Garden & Gutierrez 7. Garden & Highway 101 SB Ramps 9. Carrillo & Highway 101 NB Ramps 11. Carrillo & San Andres 13. Mission & Castillo 15. Mission & Highway 101 NB Ramps 17. Mission & Modoc 19. Las Positas & Cliff 21. Las Positas & 101 SB Ramps 23. Las Positas & State 25. Hope & State 27. Hope-Calle Real & Highway 101 NB Ramps | <ol style="list-style-type: none"> 2. Coast Village Road Roundabout 4. Milpas & Haley 6. Garden & Highway 101 NB Ramps 8. Castillo & Haley 10. Carrillo & Highway 101 SB Ramps 12. Mission & State 14. Mission & Bath 16. Mission & Highway 101 SB Ramps 18. Meigs Road & Cliff Drive 20. Las Positas & Modoc 22. Calle Real & Highway 101 NB Ramps 24. Hitchcock & State 26. La Cumbre & State |
|---|--|

CONSISTENCY WITH COUNTY AND CITY POLICIES

The following section reviews the Project's consistency with the County and City transportation policies and standards.

County Roadways

The study-area roadways located in the County currently carry volumes within the Montecito Community Plan policy capacities². The Project's average daily traffic additions (see Figure 2) would not cause an exceedance of the policy capacities.

County/City Intersections

Table 3 shows the Project's peak hour traffic additions to the study-area intersections and identifies the Project's consistency with County and City policies

Table 3
Project Trips at Key Intersections

Intersection	Jurisdiction	Project-Added PM Peak Trips	Consistent?
Spring Road/Olive Mill Road	County	13	Yes
Olive Mill Road/Coast Village Road	City/County	4	Yes
Coast Village Road Roundabout	City	0	Yes
US 101 NB/Cabrillo Boulevard	City	3	Yes

As shown in Table 3, the Project's traffic additions at the County and City intersections in the study-area would not exceed the intersection policies adopted by the respective agencies.

² Biltmore & Coral Casino Proposed FEIR, April, 2005.

PARKING DEMAND ANALYSIS

Parking demand estimates were developed for the changes to the Coral Casino and Biltmore Hotel operations that are proposed in the revised Conditions #3 and #22. Data presented in the ULI Shared Parking Report³ and the ITE Parking manual (5th Edition)⁴, as well as operational data developed for the Project, were used for the analysis. The specific parking analysis methodologies used for the analysis are discussed below.

Public Restaurant Guests. Parking demand estimates for the 265 public restaurant guests were developed assuming an average vehicle occupancy (AVO) of 2.0 guests per vehicle and a 30% peaking factor.

La Marina Banquet Space. Parking demand estimates for the 2,050 SF of the La Marina banquet room that would be converted to hotel guest amenity space were developed using the ULI shared parking data that was used in the previous EIR completed for the Project.

Reciprocal Members. Parking demand estimates for the reduction in reciprocal members from 120/month to 60/month assumed 2 member visits per day (60 visits per month/30 days = 2 visits per day).

Guests of registered Biltmore Hotel Guests. Parking demand estimates for the guests of Biltmore hotel guests who would no longer be identified as a special class of user at the Coral Casino were developed assuming 14 guests per day (consistent with the previous EIR analysis) and an AVO of 2.0 guests per vehicle.

Hotel Room Keys. Parking demand estimates for the Biltmore Hotel room keys that would be removed were developed using the ITE parking demand rates for Hotel (Land Use Code #310).

50 Seasonal Members. Parking demand estimates 15 members per day with 2 during peak parking period and an AVO of 2.0 guests per vehicle.

Table 4 shows the change in peak parking demands that would result from the modifications to Conditions #3 and #22 (worksheet attached).

³ Shared Parking, Urban Land Institute, 3rd Edition, 2020.

⁴ Parking Generation, Institute of Transportation Engineers, 5th Edition, 2019.

Table 4
Peak Parking Demand Estimates

Land Use	Size	AVO/ Demand Rate	Vehicles	Peak Hour Factor (a)	Parking Demand
Proposed					
Public Guests (b)	265 Guests	2.0 AVO	133	30%	40
Removed					
Reciprocal Members (c)	60 Members	1.0 AVO	2	30%	1
Guests of Hotel Guests (b)	14 Guests	2.0 AVO	7	30%	2
La Marina Banquet (d)	2,050 SF	16.5 / KSF	34	70%	24
Hotel (e)	14 Keys	1.15 / Key	16	90%	14
Seasonal Members (f)	15 Members	1.0 AVO	15	10%	2
Total					43
Net Total					-3

(a) Peak Hour Factor based on data from ITE and ULI Reports.

(b) Assumes 2 guests per vehicle (2.0 AVO).

(c) Assumes 2 per day (60/30 = 2).

(d) Parking rate based on ULI rate for Meeting/Banquet Space. Assumes 55% non-hotel.

(e) Parking rate based on ITE rate Hotel (#310) Saturday.

(f) Assumes 1 member per vehicle (1.0 AVO).

The data presented in Table 4 show that Project would reduce peak parking demands by 3 spaces compared to existing conditions. Therefore, the Project's existing parking supply will accommodate the parking demands after the modifications to Conditions #3 and #22.

VMT ANALYSIS

The County of Santa Barbara has adopted a new set of CEQA transportation impact standards, in compliance with Senate Bill 743, which are based on a Vehicle Miles Traveled (VMT) metric rather than the traditional Level of Service (LOS) metric⁵. Per the State's Natural Resource Agency Updated Guidelines for the Implementation of the CEQA adopted in 2018, VMT has been designated as the most appropriate measure of transportation impacts. "Vehicle Miles Traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. For land use projects, vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.

⁵

Transportation Analysis Updates in Santa Barbara County, County of Santa Barbara, July 2020.

VMT Thresholds and Screening Criteria

The County's adopted VMT thresholds of significance and screening criteria (attached) generally follow the State guidelines, which are reviewed below.

CEQA Guidelines. The California Governor's Office of Planning and Research (OPR) published a Technical Advisory on Transportation that includes recommendations regarding assessment of VMT, development of screening criteria, thresholds of significance, and mitigation measures.⁶ The Technical Advisory provides screening tools to determine when a project may have a significant VMT impacts, as follows:

"Many agencies use "screening thresholds" to quickly identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. (See e.g., CEQA Guidelines, §§ 15063(c)(3)(C), 15128, and Appendix G.) As explained below, this technical advisory suggests that lead agencies may screen out VMT impacts using project size, maps, transit availability, and provision of affordable housing.

Screening Threshold for Small Projects

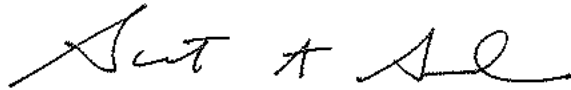
Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than significant transportation impact."

As shown in Table 1, the Project is forecast to generate 92 ADT, which is less than the 110 ADT threshold. The Project would therefore have a less-than-significant VMT impact based on the new CEQA guidelines and screening thresholds adopted by the County and the State.

⁶ Technical Advisory on Evaluating Transportation Impacts in CEQA, Governor's Office of Planning and Research, December 2018.

This concludes ATE's traffic, parking and VMT analysis for the Coral Casino DP Amendment.

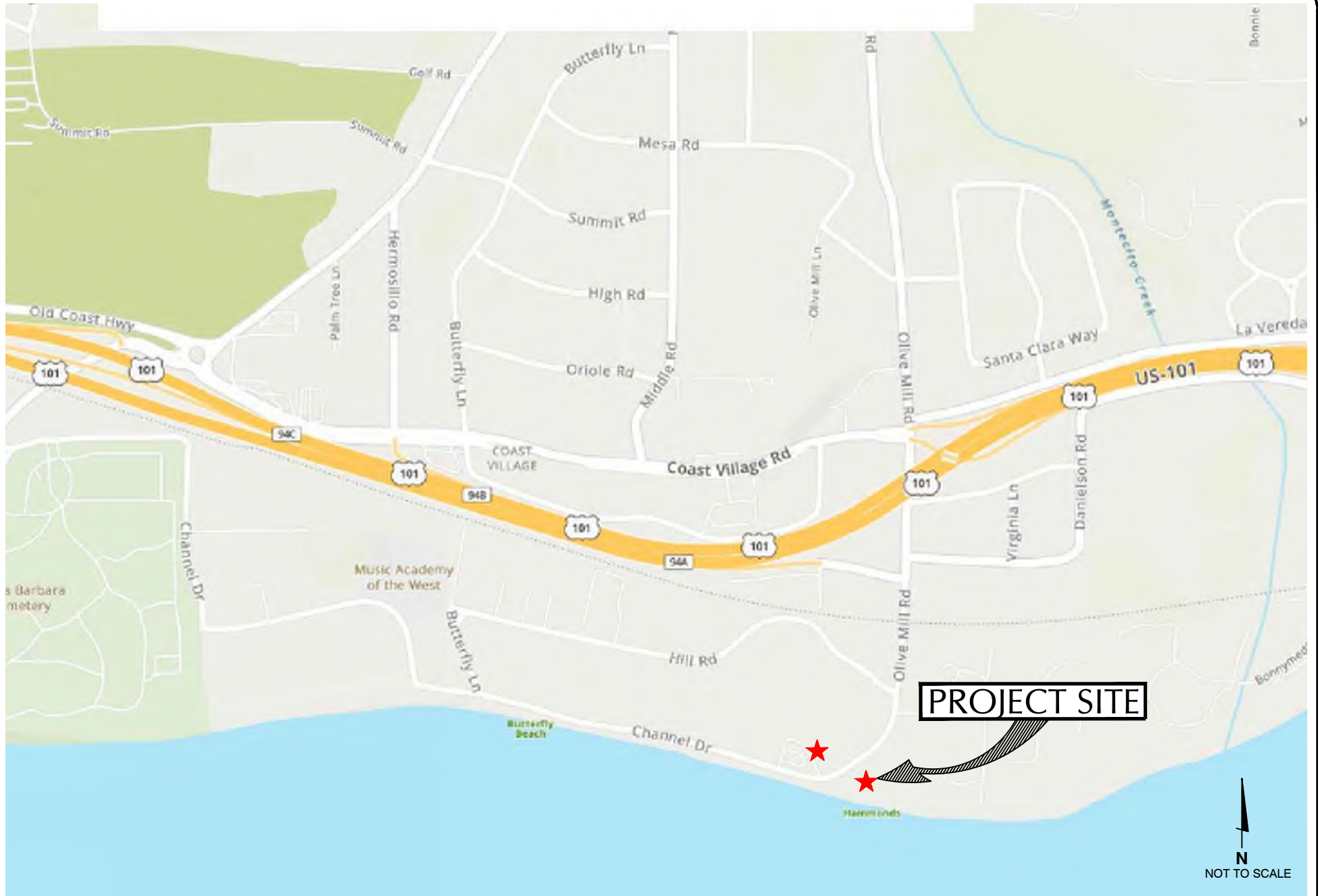
Associated Transportation Engineers

A handwritten signature in black ink, appearing to read "Scott A. Schell". The signature is written in a cursive style with a large initial 'S' and a distinct 'A'.

Scott A. Schell
Principal Transportation Planner

SAS/GOM

Attachments

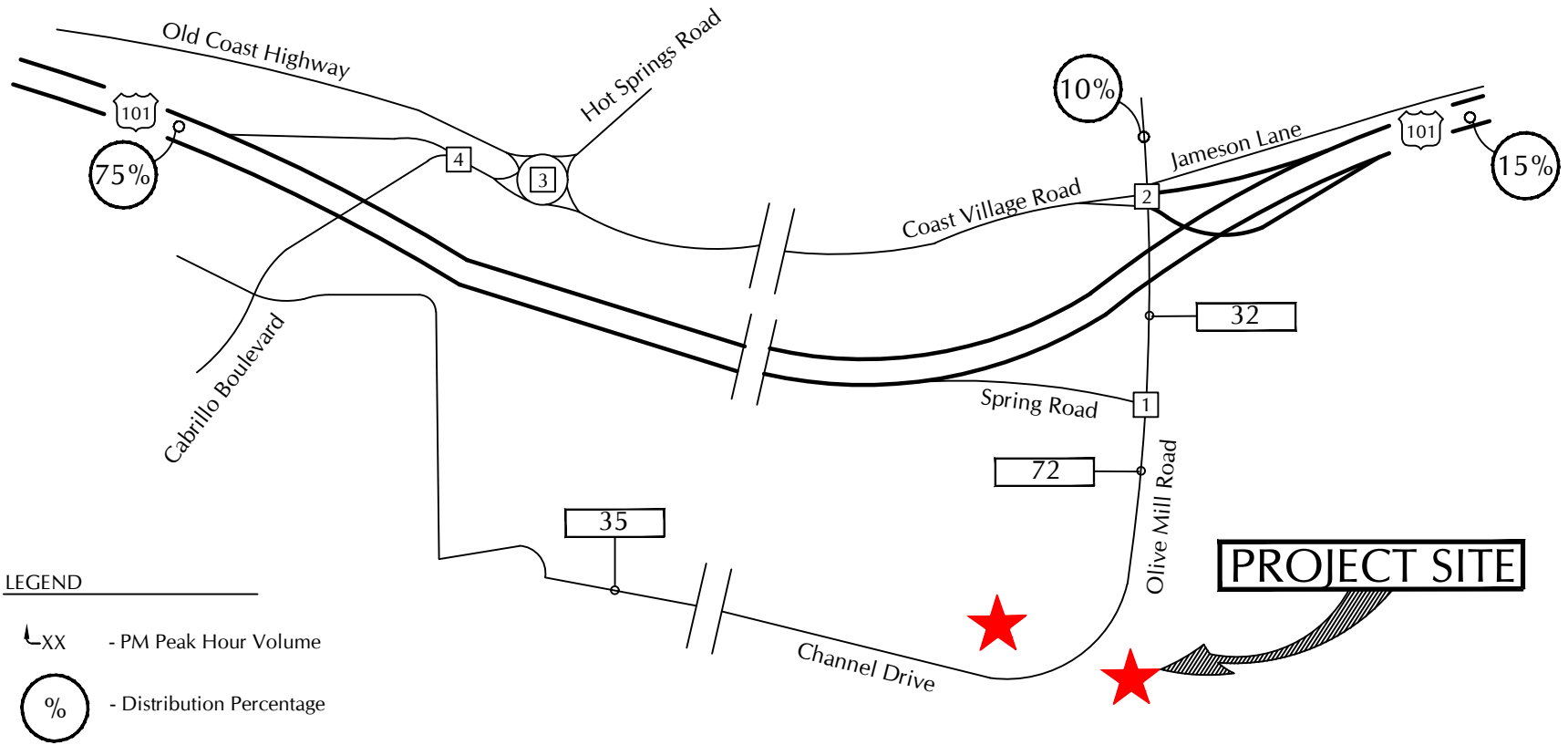
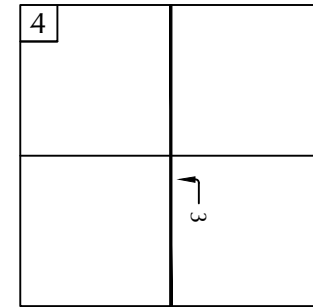
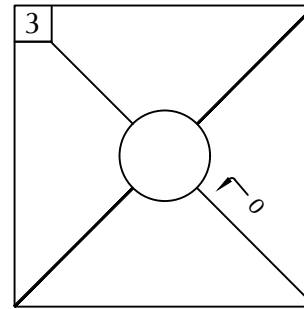
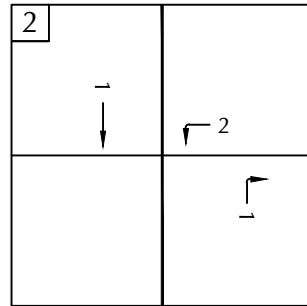
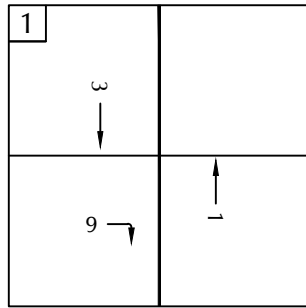


ASSOCIATED
TRANSPORTATION
ENGINEERS

PROJECT SITE LOCATION

FIGURE 1

GM- ATE#21091



ASSOCIATED
TRANSPORTATION
ENGINEERS

PROJECT TRIP DISTRIBUTION AND ASSIGNMENT

FIGURE 2

GM-ATE#21091

Associated Transportation Engineers #21091
Trip Generation Worksheet - Remove La Marina Banquet & Remove 14 Hotel Room Keys

CORAL CASINO PROJECT

Use	Size	AVO	ADT		AM PEAK HOUR				PM PEAK HOUR							
			Rate	Trips	Rate	Trips	In %	Trips	Out %	Trips	Rate	Trips	In %	Trips	Out %	Trips
PROPOSED																
Public Guests (a)	265 Guests	2.0	2.00	265	1%	3	50%	2	50%	1	11%	29	67%	19	33%	10
REMOVED																
Reciprocal Members (b)	60 Members	1.0	2.00	4	1%	0	50%	0	50%	0	11%	0	67%	0	33%	0
Guests of Hotel (c)	14 Guests	2.0	2.00	14	1%	0	50%	0	50%	0	11%	2	67%	1	33%	1
La Marina Banquet (d)	2,050 SF			28	10%	3	50%	2	50%	1	10%	3	67%	2	33%	1
Hotel (e)	14 Keys		7.99	112	0.46	6	56%	3	44%	3	0.59	8	51%	4	49%	4
Seasonal Members (f)	15 Members	2.0	2.00	15	1%	0	50%	0	50%	0	11%	2	67%	1	33%	1
Totals				92		-6		-3		-3		14		11		3

(a) New Access to Public Guests. Trip generation assumes 2 guests per vehicle (2.0 AVO).

ADT: $(265 / 2.0 \text{ AVO}) \times 2 \text{ Trips} = 265 \text{ ADT}$

AM Peak Hour assumes 1% of ADT based on ITE Rates $(0.02 / 2.6 = 1\%)$

PM Peak Hour assumes 11% of ADT based on ITE Rates $(0.28 / 2.6 = 11\%)$

(b) Reduction of 120/month to 60/month. Trip generation assumes 2 per day $(60 / 30 = 2)$

(c) Existing Non-Hotel Guests are incorporated into the new Public Guests. Trip generation assumes 2 guests per vehicle (2.0 AVO).

(d) Trip generation for meeting/conference rooms assumes (55% non-hotel guests) and 2 events per week.

(e) Trip generation based on ITE Code for Hotel (#310).

(f) Trip generation assumes 15 members per day and 2 guests per vehicle (2.0 AVO).

Trips to Coast Village Road / Olive Mill Road Intersections

US 101 South	In	15%	2
Olive Mill North	In	10%	1
US 101 South	Out	15%	0
US 101 North	Out	10%	0
Olive Mill North	Out	10%	0
Total			3

Associated Transportation Engineers #21091
Peak Parking Demand Worksheet - Remove La Marina Banquet & Remove 14 Hotel Room Keys

CORAL CASINO PROJECT

Use	Size	AVO	Parking Rate	Vehicles	Peak Hour Factor	Parking Demand
PROPOSED						
Public Guests (a)	265 Guests	2.0	1.00	133	30%	40
REMOVED						
Reciprocal Members (b)	60 Members	1.0	1.00	2	30%	1
Guests of Hotel Guests (c)	14 Guests	2.0	1.00	7	30%	2
La Marina Banquet (d)	2,050 SF		16.50	34	70%	24
Hotel (e)	14 Keys		1.15	16	90%	14
Seasonal Members (f)	15 Members	1.0	1.00	15	10%	2
Totals						-3

- (a) New Access to Public Guests. Assumes 2 guests per vehicle (2.0 AVO).
- (b) Reduction of 120/month to 60/month. Assumes 2 per day (60 / 30 = 2).
- (c) Existing Non-Hotel Guests are incorporated into the new Public Guests. Assumes 2 guests per vehicle (2.0 AVO).
- (d) ULI Parking ratio for Meeting/conference rooms. Assumes (55% non-hotel guests) and 2 events per week.
- (e) ITE rate Hotel (#310) Saturday. ULI rate for peak hour factor.
- (f) Removal of 50 seasonal memberships. Assumes 15 per day.

applicable screening criteria. A project that meets at least one of these screening criteria would have a less than significant impact on VMT and, therefore, would not require further VMT analysis.

Table 5 contains OPR's sample list of transportation projects that would not likely lead to a substantial or measurable increase in VMT and can be screened from further VMT analysis.

TABLE 4: VMT SCREENING CRITERIA FOR LAND USE PROJECTS

Screening Categories	Project Requirements to Meet Screening Criteria
Project Size	A project that generates 110 or fewer daily trips. ¹
Locally Serving Retail	A project that has locally serving retail uses that are 50,000 square feet or less, such as specialty retail, shopping center, grocery/food store, bank/financial facilities, fitness center, restaurant, or café. If a project also contains a non-locally serving retail use(s), that use(s) must meet other applicable screening criteria.
Project Located in a VMT Efficient Area	A residential or employment project that is located in an area that is already 15 percent below the county VMT (i.e., "VMT efficient area"). The County's Project-Level VMT Calculator determines whether a proposed residential or employment project is located within a VMT efficient area.
Transit Proximity	<p>A project that is located within a ½ mile of a major transit stop or within a ½ mile of a bus stop on a high-quality transit corridor (HQTC). A major transit stop is a rail station or a bus stop with two or more intersecting bus routes with service frequency of 15 minutes or less during peak commute periods. A HQTC is a corridor with fixed route bus service with frequency of 15 minutes or less during peak commute periods. However, these screening criteria do not apply if project-specific or location-specific information indicates the project will still generate significant levels of VMT. Therefore, in addition to the screening criteria listed above, the project should also have the following characteristics:</p> <ul style="list-style-type: none"> - Floor area ratio (FAR) of 0.75 or greater; - Consistent with the applicable SBCAG Sustainable Communities Strategy (as determined by the County); - Does not provide more parking than required by the County's Comprehensive Plan and zoning ordinances; and - Does not replace affordable housing units (units set aside for very low income and low income households) with a smaller number of moderate or high-income housing units.
Affordable Housing	A residential project that provides 100 percent affordable housing units (units set aside for very low income and low income households); if part of a larger development, only those units that meet the definition of affordable housing satisfy the screening criteria.

**ATTACHMENT F: ASSOCIATED TRANSPORTATION ENGINEERS (ATE) UPDATED
TRAFFIC, PARKING, AND VMT ANALYSIS ADDENDUM, DATED MARCH 2, 2022**



ASSOCIATED TRANSPORTATION ENGINEERS

100 N. Hope Avenue, Suite 4, Santa Barbara, CA 93110 • (805)687-4418 • main@atesb.com

Since 1978

Richard L. Pool, P.E.
Scott A. Schell

March 2, 2023

21091L04

Steve Welton
SEPPS
1625 State Street, Suite 1
Santa Barbara, CA 93101

CORAL CASINO TYDES RESTAURANT DP AMENDMENT – TRAFFIC AND PARKING STUDY ADDENDUM

Associated Transportation Engineers (ATE) has prepared the following traffic and parking study addendum for Coral Casino Tydes Restaurant Development Plan (DP) Amendment (the “Project”). The addendum updates the June 10, 2022 traffic and parking study based on the new proposal for the room key reduction and addresses the peer review comments provided by Stantec.

SUMMARY OF ADDENDUM CHANGES

The following summarizes the changes that have been incorporated into the addendum for the traffic and parking calculations:

- Addendum assumes 37 room keys would be removed from the Biltmore Hotel to bring the total from 229 to 192 (14 room keys removed in 2022 study).
- Removed the banquet facility trip credits to avoid double counting with hotel key traffic estimates.
- Addendum assumes 30% of the restaurant patrons came from the Biltmore Hotel for traffic and parking calculations.
- Removed the seasonal members credit for traffic and parking (seasonal members would use Biltmore fitness facilities instead).

UPDATED TRIP GENERATION ESTIMATES

Updated trip generation estimates were developed for the various components of the Project based on operational data obtained from the hotel operators and data presented in the Institute of Transportation Engineers (ITE) Trip Generation Manual¹. Table 1 summarizes the trip generation estimates developed for the Project. It is noted that the analysis focuses on the average daily and PM peak hour periods as the public guests would be limited to lunch and dinner service, and thus would not generate AM peak hour trips.

Table 1
Project Trip Generation

Land Use	Use Per Day/Size	AVO	ADT		PM Peak Hour	
			Rate	Trips	Rate	Trips
Proposed						
Restaurant Public Guests (a)	265 Guests	2.0	2.00	186	11%	20
Removed						
Reciprocal Members (b)	2 Members	1.0	2.00	4	11%	0
Guests of Hotel Guests (a)	14 Guests	2.0	2.00	14	11%	2
La Marina Banquet (c)	2,050 SF	-	NA	NA	NA	NA
Hotel (d)	37 Keys	-	7.99	296	0.59	22
Seasonal Members (e)	50 Members	-	NA	NA	NA	NA
Total				314		24
Net Total				-128		-4

- (a) Analysis assumes 30% of restaurant guests come from the Biltmore Hotel. PM Peak Hour assumes 11% of ADT based on ITE Rates ($0.28 / 2.6 = 11\%$).
- (b) Assumes 2 members per day ($60 / 30 = 2$)
- (c) Traffic generated by the banquet room is included in the hotel key traffic estimates.
- (d) Trip generation based on ITE rates for Hotels (Land Use Code #310).
- (e) Biltmore Hotel contains spa and fitness facilities, thus no change in traffic assumed for reduction in seasonal members.

As shown in Table 1, the Project would result in a reduction of 128 average daily trips (ADT) and a reduction of 4 PM peak hour trips.

Based on these traffic reductions, the Project would not have the potential to generate any inconsistencies with the Montecito Community Plan policies or generate any VMT impacts.

¹ Trip Generation, Institute of Transportation Engineers, 11th Edition, 2021.

UPDATED PARKING DEMAND ANALYSIS

Parking demand estimates were developed for the Project with the key changes discussed previously. Data presented in the ULI Shared Parking Report² and the ITE Parking manual (5th Edition)³, as well as operational data developed for the Project, were used for the analysis. Table 2 shows the change in peak parking demands for the Project.

Table 2
Peak Parking Demand Estimates

Land Use	Size	AVO/ Demand Rate	Vehicles	Peak Hour Factor (a)	Parking Demand
Proposed					
Public Guests (b)	265 Guests	2.0 AVO	93	30%	28
Removed					
Reciprocal Members (c)	60 Members	1.0 AVO	2	30%	1
Guests of Hotel Guests (b)	14 Guests	2.0 AVO	5	30%	2
La Marina Banquet (d)	2,050 SF	16.5 / KSF	34	70%	24
Hotel (e)	37 Keys	1.15 / Key	43	90%	39
Seasonal Members (f)	50 Members	NA	NA	NA	NA
Total					66
Net Total					-38

(a) Peak Hour Factor based on data from ITE and ULI Reports.

(b) Analysis assumes 30% of restaurant guests come from the Biltmore Hotel.
Assumes 2 guests per vehicle (2.0 AVO).

(c) Assumes 2 per day (60/30 = 2).

(d) Parking rate based on ULI rate for Meeting/Banquet Space. Assumes 55% non-hotel.

(e) Parking rate based on ULI rate for Hotel guests and employees.

(f) Biltmore hotel contains spa and fitness facilities, thus no change in parking assumed.

The data presented in Table 2 show that the Project would reduce peak parking demands by 38 spaces compared to current CUP entitlements.

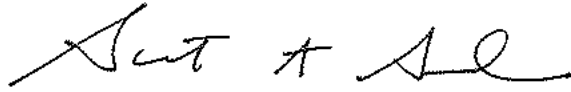
Based on these parking demand reductions, the Project would not have the potential to generate parking impacts.

² Shared Parking, Urban Land Institute, 3rd Edition, 2020.

³ Parking Generation, Institute of Transportation Engineers, 5th Edition, 2019.

This concludes ATE's traffic and parking addendum for the Coral Casino Tydes DP Amendment.

Associated Transportation Engineers

A handwritten signature in black ink, appearing to read "Scott A. Schell". The signature is fluid and cursive, with the first name "Scott" being the most prominent part.

Scott A. Schell
Principal Transportation Planner

SAS/GOM

ATTACHMENT G: STANTEC UPDATED TRAFFIC, PARKING, AND VMT ANALYSIS
PEER REVIEW, DATED MARCH 3, 2022

To:	Chip Wulbrandt Price Postel & Parma	From:	Dennis Lammers, PTP Derek Rapp, TE Santa Barbara Office
File:	PN 2042656300	Date:	March 3, 2023

Reference: Coral Casino Tydes Restaurant DP Amendment - Traffic Study Peer Review

Stantec has reviewed the *Coral Casino Tydes Restaurant DP Amendment - Traffic and Parking Study Addendum (ATE March 2, 2023)*, which updates the *Updated Traffic, Parking and VMT analysis for the Coral Casino Tydes Restaurant DP Amendment (ATE June 10, 2022)*.

The *Traffic and Parking Study Addendum* indicates that the project would result in a reduction of 128 average daily trips and a reduction of four PM peak hour trips and would not have the potential to generate significant traffic or VMT impacts based on County thresholds. The parking demand analysis indicates that the project would result in a parking demand reduction of 38 parking spaces compared to current entitlements and would not have the potential to generate parking impacts.

Stantec verified the traffic study assumptions regarding land use and trip generation estimates, the parking analysis parameters, parking demand calculations, and the VMT analysis. Pursuant to industry standards, the analysis applies *Institute of Transportation Engineers (ITE)* trip generation rates and ITE and *Urban Land Institute (ULI)* parking demand rates where applicable. Assumptions regarding rates for land uses for which no ITE or ULI rates are available, average vehicle occupancy and guest capture from the hotel are acceptable.

In summary, Stantec concurs with the findings of the *Coral Casino Tydes Restaurant DP Amendment - Traffic and Parking Study Addendum (ATE March 2, 2023)*.