

ATTACHMENT 13



ASSOCIATED TRANSPORTATION ENGINEERS

100 N. Hope Avenue, Suite 4, Santa Barbara, CA 93110 • (805) 687-4418 • FAX (805) 682-8509

Since 1978

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

February 13, 2015

14051L19

Evan Krenzien
Caruso Affiliated
101 The Grove Drive
Los Angeles, CA 90036

***RESPONSE TO COMMENTS FOR THE REVISED MIRAMAR HOTEL PROJECT,
SANTA BARBARA COUNTY***

Associated Transportation Engineers (ATE) has prepared the following responses to the comments made in the January 13, 2015 letter submitted by Arthur L. Kassan, P.E. on Miramar Hotel Project (letter attached for reference). These responses were submitted to the Montecito Planning Commission at the January 21, 2015 hearing in memo format.

(Note: as a result of the January 21st hearing, conditions of approval were revised or added to the project, and as such additional information has been included in this letter. Any new information has been noted as such. It should also be addressed that at the hearing on the 21st County Public works asserted their concurrence based on their independent review that the parking is adequate for the project as proposed by the applicant)

Comment A: Employee Parking. The employee forecasts developed for the Miramar Hotel include the employees required for the banquet /conference facility. A detailed listing of the hotel employee requirements for all of the Miramar Hotel uses was prepared by PKF Consulting and submitted to the County.

The employee parking demand forecasts developed for the project were based directly on the ULI and ITE parking data. These parking forecasts reflect the higher level of alternative transportation modes used by hotel employees.

The Miramar Hotel Project will be limited to 200 beach club members for the first 12 to 18 months, and the additional 100 members can only be added after a review of parking has been conducted and the additional members are approved by the MPC. With this limitation, there will be an additional 35 to 49 reserve spaces on the site to ensure that adequate parking is provided when the hotel opens. (Note: As a result of the January 21st hearing, the

commission reduced initial beach club memberships to 100 members for the first 36 to 42 months. The applicant through the appeal process seeks to return this to 200 members for the first 24 to 36 months. The applicant's request represents a slightly longer period before beach club memberships can be reviewed to mirror the stabilization period. At stabilization the hotel is projected to achieve an average occupancy of 76%).

If parking is found to impact the neighborhood, the County and the MPC have numerous conditions of approval that can be implemented to remedy the situation. (Note: Conditions 52 and 55 deal directly with this matter, as well as new conditions of approval 93 and 94.)

Comment B: Beach Club Parking. Mr. Kassan continues to hypothesize that Beach Club members will not utilize the hotel valet service, even though it is provided as part of the membership package, and instead will search for a parking spots on Miramar Avenue or other neighborhood streets.

In order to address this neighborhood concern, the beach club has been moved to the eastern side of the hotel complex. With the new location, the valet parking is more convenient than the parking on Miramar Avenue.

Comment C: ITE Parking Data. The data published in the ITE Parking Generation report is certainly not "irrelevant" to the discussion of parking for the Miramar Hotel. The description of the facilities studied for the ITE report closely match the Miramar Hotel.

"Resort Hotels are similar to hotels (Land Use Code 310) in that they provide sleeping accommodations, restaurants, cocktail lounges, retail shops and guest services. The primary difference is that resort hotels cater to the tourist and vacation industry, often provide a wide variety of recreational facilities/programs (golf courses, tennis courts, beach access, or other amenities) rather than convention and meeting business. Resort hotels are normally located in suburban or outlying on larger sites than convention hotels. All study sites reported the availability of conference facilities, with meeting/banquet rooms and on-site restaurant".

Based on this description, the ITE study locations are clearly relevant to the discussion of the Miramar Hotel parking demands. The ITE report shows peak 85th percentile demands for Resort Hotels at 1.59 spaces per room. The *highest* rate observed in all of the ITE parking studies was 2.16 spaces per room. The parking provided at the Miramar Hotel (2.6 spaces per room) exceeds this highest rate by 20%. The ITE data validates the parking analysis that was completed for the project.

Comment D: Biltmore Hotel Comparison. The comparison provided between the Miramar Hotel and the Biltmore Hotel was originally developed at the request of the Montecito Planning Commission when the previous Miramar Hotel project was approved. The comparison provides a real world check on the parking ratios that are proposed for the Miramar Hotel.

The County has determined through several development plan amendments over that last 10 years that the parking provided at the Biltmore Hotel is indeed adequate. The County made these findings for three separate land uses approvals at the Biltmore.

It is also noted that if the parking analysis methodology proposed by Mr. Kassan were applied to the Biltmore Hotel, the parking demands experienced at the Biltmore facilities would exceed the existing supply by over 350 parking spaces on summer weekends. This simply does not happen in reality.

Comment 1a: Banquet Parking. As noted above, the employees associated with the banquet facilities are included in the employee forecasts developed for the hotel. The parking rate of 2.0 guests per vehicle used for the analysis was derived directly from the ULI Shared Parking report which recommends a ratio of 0.5 spaces per seat (1 space per two people). The 30% factor assumed for hotel guests utilizing the on-site banquet facilities was also derived directly from the ULI report and was validated by data provided to the County from the adjacent Biltmore Hotel. Furthermore, the time of day factors used for the analysis are consistent with those recommended in the ULI Shared Parking report.

Comment 1b: Banquet Guest Parking. The ULI Shared parking report recommends a hotel guest captive ratio of 40% on weekdays and 30% on weekends for on-site banquet facilities. Additionally, data submitted to the County by the Biltmore Hotel confirmed the 30% hotel guest utilization assumption. Mr. Kassan offers no evidence to the contrary.

The vehicle occupancy data provided by the valet operators was cited as another source in order to confirm that the parking analysis completed for the project was in fact conservative.

Comment 2: South Jameson Lane Parking. There are two hotel driveway locations on South Jameson Lane that can accommodate U-turn maneuvers. Both locations are gated and would be used infrequently by the hotel, thus there would be minimal conflicts with hotel traffic. The driveway designs have been reviewed with County Public Works staff to confirm that they can safely accommodate passenger car U-Turn maneuvers.

Comment 2: Volumes on South Jameson Lane. First, Mr. Kassan erroneously assumes that the design of the angled parking spaces will require drivers to back across two lanes of traffic. The parking spaces have been designed so that vehicles can back out without crossing the roadway centerline.

Second, the volumes cited in this comment are not representative of normal day operations, as they relate to the peak volumes that would be experienced during the one hour period when a peak event was held on a peak day at the hotel with all other facilities fully occupied. The future two-way volumes on South Jameson Road would be approximately 150 vehicles per hour in each direction. This equates to 2.5 cars per minute or one car every 24 seconds. It is also noted that the County has successfully implemented angled parking on other streets (including the adjacent community of Summerland) that carry significantly higher traffic volumes than South Jameson Lane.

Comment 3: Secondary Parking Lot Operations. The secondary parking lot will be used first by employees. When events larger than 200 guests are held at the site on peak summer weekends, the additional spaces in the parking lot will be used. (Note: Per the project description, the secondary parking lot will used first by employees. Adherence to the project description is required per the County's Conditions of Approval and deviation from the project description becomes a violation and subject to County enforcement procedures.)

Mr. Kassan confuses the discussion regarding the need for the additional parking with events having more than 200 event guests. The statement made in the ATE study is that the overflow spaces in the secondary parking lot would only be used when an event with a size of over 200 guests is held at the Miramar Hotel on a peak summer day when all other facilities are fully utilized. It is at this point that the additional guests above the 200 level will require the use of the spaces in the secondary parking lot.

The volumes on Miramar Avenue will easily accommodate left-turn movements from the project driveways onto the roadway. The parking activity in the angled parking spaces will be relatively low turn-over and will not create a significant traffic issue.

Comment 6: Miramar Avenue Assigned Parking. The assigned parking on Miramar Avenue will be clearly signed for hotel use only and will be monitored and enforced by the hotel. The supposition that the rules and laws that govern traffic and parking will always be broken and can never be enforced is not a valid comment (Note: Conditions of Approval 52 and 55 all enforce the assigned parking requirements, decal system, signage requirements, a designated parking coordinator, a parking plan, and compliance reporting).

Comment 7: Miramar Avenue Beach Club Parking. Mr. Kassan continues to comment that Beach Club members will not utilize the hotel valet service, even though it is provided as part of the membership package, and instead will search for a parking spots on Miramar Avenue or other neighborhood streets.

In order to address this neighborhood concern, the beach club has been moved to the eastern side of the hotel complex. With the new location, the valet parking is more convenient than the parking on Miramar Avenue.

Comment 8: Miramar Avenue Parking. The current plan provides more public parking in the neighborhood - on South Jameson Lane, Eucalyptus Road, and Miramar Avenue - than any of the other development plans approved for the Miramar Hotel. The loss of parking on the north-south section of Miramar Avenue has been more than offset by the additional public parking provided.

Comment 9: Miramar Avenue Parking. The approved Miramar Hotel plan provided 68 public parking spaces. The current plan provides a total of 80 public parking spaces (including the 10 new spaces on Miramar Avenue) which is 12 more spaces than the approved plan.

Comment 10: The Miramar Hotel site has been designed to provide pedestrian access between the hotel and the beach for both hotel guests and members of the public. Public utilization of the on-site paths will not impact hotel operations. The walking distance from the parking spaces to the beach is not abnormal. For instance, the walking distance to the beach from the secondary parking lot at Arroyo Burro Beach in Santa Barbara is similar to the distance from the parking spaces on South Jameson Lane (Note: Condition of Approvals 49 and 51 require public, pedestrian access easement recordation and signage for public routes/pedestrian access through the site to the beach).

Comment 11: Vehicle turn templates were provided to the County for the delivery truck maneuver. The Montecito Fire District has also signed off on the design of the cul-de-sac as being adequate for the Fire equipment. This has also been reviewed and approved by County Public Works.

Comment 12: Miramar Avenue Cul-De-Sac Parking. The cul-de-sac at the end of Miramar Avenue will be clearly signed and marked for no parking and will be enforced. The supposition that the rules and laws that govern traffic and parking will always be broken and can never be enforced is not a valid comment. This has been reviewed and approved by County Public Works.

Comment Page 6: Parking Space Length. The adjustment of the parking stalls to 23-foot lengths resulted in the loss of 1 hotel parking spot adjacent to the hotel bungalows. This parking space has been replaced on the hotel grounds so the total spaces provided (436) did not change. The parking area on the south side of Miramar Avenue will not be marked so no changes to the parking would occur in that area.

This concludes our responses to the comments submitted in the letter from Arthur Kassan on the revised Miramar Hotel Project.

Associated Transportation Engineers

A handwritten signature in black ink, appearing to read 'Scott A. Schell', written in a cursive style.

Scott A. Schell, AICP, PTP
Principal Transportation Planner

SAS/MMF

Attachments

ARTHUR L. KASSAN, P.E.
Consulting Traffic Engineer

January 13, 2015

Mr. Robert P. Silverstein, Esq.
The Silverstein Law Firm
215 North Marengo Avenue, 3rd Floor
Pasadena, CA 91101-1504

Subject: Impacts of Proposed Miramar Hotel

Dear Mr. Silverstein:

This is in reply to the letter prepared by Associated Transportation Consultants (ATE) on December 29, 2014, addressed to Mr. Evan Krenzian of Caruso Affiliated. The purpose of the ATE letter was to respond to comments regarding hotel parking and traffic that were made by County Planning Commissioners and by me in my letter of December 10, 2015.

Following are my replies to the responses in the ATE letter. The first four replies, designated A through D, in this letter relate to the ATE responses to the Planning Commission comments.

A. On page 2: ATE states: "The parking demand estimates for the restaurants, bars and dining areas *included* employee parking demands in their forecasts ..." According to the November 18, 2014 parking analysis by ATE, the hotel's fine-dining restaurant will need a maximum of 17 parking spaces during the daytime, the family-dining restaurant will need a maximum of 30 spaces during the daytime, and the bar will need a maximum of 7 spaces during the daytime. Those spaces will be primarily for non-hotel-guest patrons of the three facilities; possibly, employees of those facilities may use some of those spaces, as well. At the same time, there could be a 400-attendee event in the banquet hall. For all 400 people, ATE states, in their November report, that the need is for 140 parking spaces. But, where is the parking for the employees who will be preparing and serving a three-course meal to 400 people? Nowhere in ATE's November report or their December letter is there an estimate of the number of banquet employees at the peak time nor is there an accounting for the parking for those 50 to 60 or more employees that ATE never acknowledges and for whom no parking is provided.

B. The hotel's valet parking station will be located in the northern part of the hotel site near South Jameson Lane. From there, beach club members will have a considerable and circuitous walk through the hotel grounds to the club. Many members will find it more convenient to park on Miramar Avenue. Although ATE states that the hotel will monitor the Miramar Avenue parking, it will not be practicable to observe every vehicle as it is parking on the street and to ascertain whether it is appropriate for the driver to do so. Human nature will result in a substantial number of drivers choosing the parking closest to the club, and that will be on Miramar Avenue.

Telephone
(310) 558-0808

5105 Cimarron Lane
Culver City, CA 90230

FAX
(310) 558-1829

C. On page 3, ATE presents "industry data", published by the Institute of Transportation Engineers (ITE), on the parking demands observed at one or more "Hotels" and at one or more "Resort Hotels". But we have no way of knowing if the hotels in the ITE data bank are in any way comparable to the proposed hotel. Do the ITE hotels have large banquet halls; do they have beach clubs; are they in areas well-served by transit? Without that information, the ITE data should not be applied to the proposed hotel, and, in fact, ATE did not use those data in their November report or in their December letter. Therefore, those data are irrelevant to the study of the Miramar Hotel specific parking needs.

D. On page 4, ATE presents a comparison of the facilities at the proposed Miramar Hotel and the existing Biltmore Hotel. But, no documentation of the Biltmore Hotel statistics is presented. Nor are there any comments on the adequacy of the parking supply at the Biltmore Hotel. What is the actual, documented parking demand on a hot summer day when the hotel rooms are 100% occupied, there is a full banquet, and the beach club is heavily used? Is the number of spaces at the Biltmore adequate to accommodate all of those peak demands at the same time without spill-over onto streets or other properties? ATE does not address this vital information. It would be important to see the study data upon which such a judgment could be made and have it be part of the record; it is hoped that the study was done over several such "full-use" days to obtain a statistically reliable sample.

While ATE was gathering the data from the Biltmore Hotel, they should have asked for the number of employees that are necessary to prepare and serve a three-course meal to approximately 400 banquet guests. Also, they should have asked about the experience with the percentages of banquet guests that were non-hotel guests. Were there any large banquets at which 100% of the guests were from outside of the hotel? Or 90%? Or 80%? Those data would have been useful in solving the open questions about the adequacy of the parking proposed for the Miramar Hotel banquet/event hall. (Please also refer to the reply to Comment 1b on the following page.)

ATE also does not reveal that the reason that the Biltmore Hotel parking facilities appear to be underused is that there is a significant cost disincentive for people to park within those facilities. People attending an event at that hotel must pay as much as \$35 to park on-site, and many event attendees choose to park on the streets surrounding the hotel.

The following replies to the ATE letter deal with their responses to the comments that I made in my letter of December 10, 2014, addressed to you. For clarity, I have numbered my responses to match the numbering that ATE used in their letter

Comment 1a. On page 5, ATE states in bold print: "... estimates for the restaurants, bars and dining areas included employee parking demands in their forecasts." But those estimates could not have included banquet hall employees, because the November ATE report states that the parking for the banquet hall was estimated on the basis of "ATE Parking and Time of Day Rates, assumes 30% of guests are affiliated with hotel and a 2.0 AVO (Average Vehicle Occupancy) for public guests." [footnote in "Shared Parking Calculations" table attached to the November letter] Notice that the parking rate is based on the number of guests per vehicle and there is no mention of the employees. Nowhere in either the ATE report or their recent letter is

the number of banquet hall employees revealed, nor is there any discussion of parking for those employees. Also notice that the source of the rates upon which the hourly parking demands were estimated was not ITE or the Urban Land Institute (ULI), but ATE, the preparers of the report and the consultants to the developer. No documentation or neutral source for those critical hourly demands are presented.

Comment 1b. ATE maintains that "The parking demand analysis correctly assumed that some of the guests at the on-site events would be hotel guests." [page 5] The word "correctly" is used by ATE with no justification or documentation. Is it impossible that a major banquet could be held at the Miramar Hotel, and all of the attendees would be non-hotel-guests? In their parking analysis, ATE has assumed that fully 30% of any 400-attendee event (that is, 120 attendees) would be hotel guests who will be already parked on-site. The remaining 280 attendees would be non-hotel-guests, according to the ATE assumption, and ATE has estimated the peak parking needs based on the 280 outside attendees, only. That is not the "worst case analysis" that is required of environmental studies. (No banquet hall employees are accounted for in the 280 attendees, and no parking is provided for those employees in any of ATE's analysis.)

What will happen if there are 320 outside attendees, or if all 400 attendees are from outside? Because ATE is so confident that the hotel parking will accommodate no more than 280 outside attendees, they should agree with the recommendation in my letter that the banquet hall attendance be limited to 280 guests who are not also hotel room guests.

Later in the ATE response, they present banquet hall attendee AVOs that are substantially higher than the 2.0 people per vehicle used in their analysis – 25% to 50% higher. Those higher AVOs are based on "... information provided by valet parking operators ...", not based on a statistically validated study by neutral engineers/planners. Why does ATE present those alternative vehicle occupancy rates? Are they preparing for a major revision in their parking analysis?

Comment 2. Drivers leaving the South Jameson Lane angle parking will be headed eastbound on the street. If they want to turn around to head westbound, ATE invites them to enter the private property of the hotel and to turn around in the hotel's eastern driveway. There is no information in the ATE letter as to how the angle parkers are to be informed that the hotel eastern driveway is their recommended U-turn location. Although ATE states that such a maneuver would be safe [page 6], it is quite likely that there would be serious conflicts between hotel traffic and public traffic using that driveway, perhaps, leading to collisions. With safety as the criterion, a better solution for the South Jameson Lane U-turn demand should be found that does not use a private driveway for public street traffic maneuvers and does not result in on-site conflicts. Perhaps, a public cul-de-sac, with right-of-way taken from the hotel site, would be a feasible solution.

ATE misses the point regarding traffic volumes on South Jameson Lane. The concern is not regarding volume/capacity ratios and Levels of Service. The concern is for the convenience and safety of those who use the angle parking, particularly when they are leaving the spaces and have to back out into two lanes of two-way public street traffic. ATE estimates that the peak traffic volume on South Jameson Lane, with the hotel in full operation, will be 402

vehicles per hour. [page 7 of their letter] That will be an average of one street vehicle every 9 seconds. There may not be sufficient safe gaps in the street traffic to accommodate vehicles leaving the angle spaces conveniently and safely.

ATE does not present street speed data for South Jameson Lane in the vicinity of the angle parking. That should be a primary public safety consideration, and it has not been addressed. The STOP sign on South Jameson Lane at Posilipo Lane is a quarter of a mile or more from the angle parking. Street vehicles between Eucalyptus Lane and just east of Miramar Avenue, where the angle parking is located, are too far away from the STOP sign to be slowing for that sign. Traffic engineers know from experience that STOP signs are not speed control devices. Even with street traffic at moderate speeds, leaving the parking spaces will be dangerous.

Comment 3. The use of the northwestern parking lot for event/banquet guest parking, as described by ATE, will be impractical. Those guests, after parking in that lot, will have to "... be shuttled to the banquet hall via service carts ..." [page 7] because of the great distance, and they will have to wait in the lot for the service carts to make round trips to and from the banquet hall. Imagine banquet guests in formal attire riding in service carts and standing for 10- to 20-minute waits in the remote parking lot.

ATE states: "The secondary valet lot would provide approximately 100 overflow spaces for use when large events (over 200 guests) are held at the banquet facility ..." [page 7] If there are 100 overflow spaces, at 2 guests per parked vehicle, those spaces could accommodate 200 banquet guests. Added to the 200 guests that are mentioned in the ATE statement quoted above, there would be a total of 400 guests using parking spaces for such a banquet. That is in conflict with the ATE contention that there will never be more than 280 banquet guests (70% of 400) coming from outside the hotel. Which is the "correct" estimate?

ATE does not address the concerns that I expressed regarding valet drivers having to make left turns out of the driveway onto South Jameson Lane and from that street into the remote parking lot. The safety issue, particularly when including the parking activity at the angle parking spaces, should be considered.

Comment 6. The assigned hotel guest parking on Miramar Avenue will be accessible by the general public using that street. According to ATE, "Use of the spaces by non-hotel guests will be enforced by the Miramar Hotel (unauthorized vehicles will be towed)." [page 8] On paper, that may seem to be a viable operation, but in reality, it is bound to fail. For example, consider a hotel guest returning from a nearby restaurant or a concert, etc. between 10 p.m. and midnight. When he arrives at the hotel, his assigned space is occupied. He has three choices – park in someone else's assigned space; park in a non-hotel public space on the street (if available); or request that the other car be towed from his space. To do the third option, he will have to find the appropriate hotel employee somewhere on the hotel grounds (at that late hour, there would not be a parking attendant waiting on Miramar Avenue to guard the 18 hotel parking spaces); explain the situation; have the employee call a towing company; and wait for the tow truck to arrive and complete its function. Late at night, after a long day, the hotel guest will not be satisfied with that system. Even during the daytime and early evening hours, for as many as 14 hours per day every day, will the hotel have an attendant or security guard on full-time duty at the Miramar Avenue 18 hotel spaces to enforce their proper use and to assist authorized guests? That would be expensive and may not be practicable over the long term.

Comment 7. The hotel on-site valet parking station will be located in the northern part of the site, quite a walking distance from the beach club access. Some club members will find it more convenient to park on Miramar Avenue in the public parking spaces. ATE states that "Hotel security will frequently monitor the premises and its borders to ensure that no hotel guests, members, or employees are parking in nearby surface parking streets." [page 8] How will hotel security be able to tell if a car parked on a nearby street belongs to a guest/member/employee? Unless the security person sees the actual parking maneuver and follows the driver/passengers, there will be no way to distinguish general-public vehicles from hotel-related vehicles. That enforcement system will not be effective.

Comment 8. The comment in my letter referred to the loss of approximately 44 legal parking spaces on the north-south leg of Miramar Avenue, located a short walking distance from the beach. The ATE response is that the increase of 10 spaces on the east-west leg of that street is more parking than was provided in the previous hotel plan. That is not the relevant comparison that responds to my comment. The loss of 44 existing spaces will obviously overwhelm the provision of 10 new spaces, and there will be a net loss of 34 convenient beach parking spaces to which ATE does not respond.

Comment 9. ATE claims that the current plan will result in an increase of 14 public parking spaces, but 10 of those have already been counted as being on Miramar Avenue. Therefore, there will be only 4 new spaces on South Jameson Lane, and they will be at a considerable distance from the beach. My comment actually dealt with a comparison of the current walking distance from the existing parking on north-south Miramar Avenue to the future walking distances when the parking is on South Jameson Lane only. ATE does not address that comparison.

Comment 10. In discussing the pedestrian connection between the South Jameson Lane public parking spaces and the beach, ATE states: "Beach-goers parking in the public spaces on South Jameson Lane would use the new sidewalk to connect to the pedestrian access easements that would be provided through the Miramar Hotel site to reach the beach access south of the site." [page 9] Members of the public walking through the hotel site may result in security problems for the hotel and its guests. Families with small children and substantial beach equipment will interfere with the hotel guests' quiet enjoyment of the hotel grounds. That could be significantly detrimental to hotel attractiveness. Large numbers of people walking through the hotel grounds may result in pedestrian conflicts with hotel vehicles, such as service and maintenance carts. The walking distance between the public parking spaces on South Jameson Lane and the beach will still be substantial.

Comment 11. ATE states that fire trucks, delivery trucks, and trash trucks would be able to turn around in the reduced-radius cul-de-sac using three-point turns. [page 10] However, no proof of that, such as turning diagrams using standard design vehicle templates, is presented.

Comment 12. The installation of red curb and No Parking signs in the Miramar Avenue cul-de-sac, by itself, will not prevent drivers from parking in the bulb. It will be necessary to have frequent enforcement by the County Sheriff, and considering the remoteness of the cul-de-sac and the low level of traffic that will use Miramar Avenue, it is probable that the County Sheriff will not assign significant enforcement resources to the street.

The ATE letter does not address any of the three recommendations that were in my December letter. I believe that they have validity in mitigating the potential impacts of the proposed hotel development, and that if Caruso Affiliated's consultant chooses not to address them, the County staff should be asked to consider them.

I have also reviewed the County Planning and Development Staff Report that was made available on January 13, 2015. Toward the end of that report on page 11, there is a recommendation that the parking spaces on Miramar Avenue be 23 feet in length instead of the 20-foot length that is proposed by the developer and justified by ATE. With the longer spaces, there will be a loss of two to three spaces on the north side of the street and a loss of two spaces on the south side, compared with the developer's plan. The north-side spaces are those that will serve the bungalows on the hotel site, and a parking supply that is two to three spaces fewer than planned will have a substantial effect on the convenience of parking for the hotel guests. On the south side, the reduction of two spaces will affect the residents and beach parkers. How will those deficiencies be accounted for?

The staff report states that there are two bus stops within a less than 10-minute walk of the hotel. [page 4] However, it fails to reveal that weekday and Saturday bus service ends before 6:30 p.m., and Sunday service consists of four runs toward Montecito with the first at 12:00 noon and the last at 5:15 p.m. and five runs toward Santa Barbara with the first at 7:25 a.m. and the last at 2:25 p.m. That schedule will not provide service that will be convenient or attractive for hotel employees, especially those working at evening events. Unless the hotel intends to subsidize additional bus service in the evenings, transit cannot be considered a significant alternative travel mode for employees.

If you have any questions about my analysis, comments, and recommendations, please contact me at your convenience. I would be pleased to discuss them with County staff and officials.

Very truly yours,



Arthur L. Kassan, P.E.
Consulting Traffic Engineer

Registered Civil Engineer No. C 15563
Registered Traffic Engineer No. TR 152

