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ADDITIONAL SCOPE CONSIDERATIONS FOR THE SANTA BARBARA BOTANIC GARDEN ENVIRONMENTAL IMPACT REPORT

Dear Alex,

Thank you for conducting the scoping meeting earlier this week. We raised concerns of the “questionable expansions” done under, and in apparent conflict with, the previous CUP and in some cases contrary to the original intended uses according to the original Grantor/Donors (as per Marino letter). The creeping changes in use without any previous public hearing (listed by Paulina Conn) are as follows:

- a. Creating a classroom and running a non-permitted school in a Rec/Open Space Zone.
- b. Various shifts from “passive” to “active” uses i.e. cottage, North wing, teahouse, information/book kiosk, shift in horticultural areas, use of meadow for special attraction events, year-round plant sales, on-going educational activities, etc.

In short, the permitted and non-permitted uses under the current zoning must be addressed with public input prior to the completion of any “scoping” so that there is a general agreement with respect to what the ground rules are.

Specifically:

- a. What, if any, are the limits with respect to classes, lectures and other educational activities and events?
- b. What, if any, are the limits to kind and extent of commercial activities (e.g., a twice per year plant sale has morphed into a 7-day/week open to the public nursery) permitted under Rec/Open Space Zoning?
- c. What, if any, are the limits to institutional activities ?
- d. What, if any, are the limits to “special public events” ? What, if any, are the limits to “special private events”?
- e. What, if any, are the limits to night-time activities? The “assumption” that any and all current usage is permitted should be reexamined within the context of current land use and the MCS Specific Plan prior to scoping.
- f. What provisions will the “new CUP” have in terms of requiring public input prior to possible changes? That is, what in the new CUP, will permit future “questionable” and/or “un-permitted expansion”? In particular, how and who decides when “incrementally” becomes “significant”? How will, and by whom, with the new CUP be enforced?
- g.

As we indicated publicly, we feel the following topics should be emphasized, addressed and additional mitigations should be introduced:

- Health & Safety Resource:

The susceptibility of Mission Canyon to a catastrophic wildfire is common knowledge. Since 1955, Santa Barbara has experienced a wildfire on an average of every five years. The highly flammable chaparral on mountain slopes in Mission Canyon is always just one spark away from ignition, and with the right combination of Santana winds, low humidity and high temperatures, we may witness a disaster far beyond those of the Sycamore, Paint, Romero and Coyote fires. As discussed in Richard Law's work, Emergency Preparedness in Mission Canyon (1997), a fire starting at the top of Mission Canyon may reach the critical intersection of Tunnel and Mission Canyon Road, a distance of one mile, in 20 minutes. Within 30 minutes, Foothill Road and Fire Station 15 would be engulfed in flame.

The roadway system in Mission Canyon complicates evacuation. Ninety percent of the evacuees are dependent on two roads to leave Upper Mission Canyon: Cheltenham and Mission Canyon Road north of Foothill. These roads have no sidewalks, and no shoulders for automobiles to pull out of the path of oncoming fire engines and emergency vehicles. Pedestrians, animals and bikes must share the roadway with automobile traffic. As those who have viewed Prof. Richard Church's computerized simulation of a Mission Canyon evacuation now understand, many residents and visitors will be trapped in their vehicles as the fire passes through. There will be loss of life, possibly on a scale unimagined by this community.

The Botanic Garden's Fire Protection / Vegetation Management Plan does not minimize these risks: "There can be no guarantees that such a fire will not cause damage or injury on site." The Garden, to its credit, will take various measures to reduce the risk of a wildfire within its property boundaries. Unfortunately, these measures do nothing to reduce the risk of a fire igniting elsewhere in the Canyon, and spreading under sundowner of Santana wind conditions to the neighborhoods above and below the Botanic Garden.

In these circumstances, the lack of clear evacuation routes – both for Canyon residents and for visitors and staff at the Botanic Garden – becomes problematic. Tour and school busses attempting to flee down the Canyon will have to maneuver the one-lane stone bridge across Mission Creek, avoid the oncoming fire and emergency vehicles attempting to reach the fire lines, and dodge the panicked homeowners trying to return to their up-Canyon homes to rescue pets and property. The air will be laden with smoke and gusting winds carrying burning debris. A single accident can block the roadways, forcing a backup of vehicles and leaving the evacuees with the choice of fleeing on foot or remaining in their vehicles as the fire passes over.

Fire and Emergency Evacuation

At a public meeting held June 12, 2001, Nancy Johnson, then Director of Public Relations for the Garden, stated that the Garden had no control over the traffic on Mission Canyon Road, that the Garden felt that the Big Bug Exhibition was a success and increased the Garden's membership rolls, and that the Garden would accept no caps or limitations on the conduct of these activities in the future. Since admissions fees to these public events are a miniscule part of the Garden's revenue stream (8% according to the Lynn Karlson's recent CPA presentation), we find the Garden's resistance to caps and limits on these types of events unreasonable.

We are also ill at ease with the trend toward increased commercialism at the Garden. We have always acknowledged the gift shop, and fund raisers for the Garden such as "Night Music", which draws over 300 guests, excluding caterers and musicians. But each year seems to bring a further push into dollar-oriented activities. The disastrous Big Bug Exhibition, in May 2000 was a landmark in this trend. This year the Garden's annual plant sale, which originated as a half-day event, has been extended to one full calendar month, with "twice the inventory" being trucked in from local nurseries. We also have "GardenWorks" -- An Exhibit of Fanciful and Functional Art for the Garden" for ten days beginning July 12th. We have to ask: Are there any limits at all on the Garden's commercial activities?

The expansion plans presented by the Garden at various times and in various forms since 1990 reflect this same disregard for the Mission Canyon community. The 1990 plan with its bridge over Mission Canyon Road, the 1994 plan with obvious aesthetic deficiencies, and the 1997 plan with the two-story parking garage, all were presented to the community in take-it-or-leave-it form. The community, and County Planning as well, chose to "leave it" and the Garden withdrew its plans.

This current expansion plan retains many of the same elements that our Association had previously questioned:

- No effort has been made to remove structures, activities and staff from the Botanic Garden to locations more suitable for their conduct. Classes, in particular the advanced classes involving laboratory work, seminars and lectures, could be conducted at the campuses of Westmont, UCSB, City College or Adult Education. The colleges have previously declared their support for the Garden's activities and should welcome the opportunity to incorporate the Garden's classes into their curricula. Other sections amenable to relocation would include: Fund-raising, publications such as the *Ironwood Quarterly*, accounting and general business activities.

The Botanic Garden's library and herbarium, irreplaceable and extremely valuable collections, should be relocated to safer surroundings outside the fire-prone Canyon area. According to the Garden's submissions, fewer than four (4) people a day visit the herbarium and library, and yet the space allocated for these activities is 9,199 sq.ft. or 16 percent of the total building utilization.

Effective evacuation during an anticipated wildfire from Mission Canyon is of the greatest concern. The threat of a wildfire is most severe during the driest months of June through December. Therefore, the incremental expansion of the number of daily garden staff, visitors, volunteers, and docents will negatively impact this already serious situation especially during these months.

1. The canyon is already overpopulated related to a safe and expedient evacuation of its current residents.
2. The canyon contains a high percentage of elderly and retired residents who reside in the canyon during daytime as well as nighttime hours.
3. The canyon is surrounded by similar semipublic institutions with extreme variables in numbers related to day and evening attendance and assembly.

Maximum capacity:

The above circumstances could create an attractive nuisance without regard for capacity of evacuation. To mitigate this problem and provide for the safety of canyon residents and garden staff and visitors, the following must be undertaken:

- a. A comprehensive and combined evacuation feasibility plan for both the Botanic Garden and Mission Canyon evacuating area must be done concurrently. This combined comprehensive plan should then be integrated with an approved version of the Santa Barbara County Fire Evacuation Task Force Draft Plan approved by the County Board of Supervisors.
- b. Based on this plan, a strict limit in the total number of all vehicles parked on the garden properties should be enforced during the driest months of the year from June to December.
- c. The Botanic Garden should be closed to the public during all red flag days.

- Aesthetic Resource:

The Mission Canyon Specific Plan (1984) sets forth specific guidelines and standards for development in Mission Canyon. These provisions deal with development of ridgeline property, development on slopes with steep grades, preservation of the rural character of the Canyon, and other issues. As our Specific Plan states (p. 43):

The Mission Canyon Area is a fragile yet very scenic environment. One of the purposes of this Plan is to protect and preserve the natural beauty of the region. It is this natural beauty and openness that expresses the character of Mission Canyon. This protection and preservation process will be accomplished through the encouragement of open space and the preservation and

additional planting of trees. Before development or property improvement commences in the Mission Canyon Area, all feasible efforts must be taken to preserve the existing trees. Special attention must be placed on the preservation of oaks, sycamores, and other native trees, especially older trees. These trees are a valuable resource to the Mission Canyon Area. Another component of open space is grading. This activity must be regulated so as not to damage the environment or impose on the aesthetic beauty of Mission Canyon. *The existing open space in this area -- Rocky Nook Park, Santa Barbara Women's Club, and Santa Barbara Botanic Garden will continue to be maintained.*"

Several elements of the proposed expansion plans need to be examined in light of the Specific Plan's restrictions. These are but two worthy of mention:

- The parking lot on the Lotterhos Ridge occupies the most desirable piece of Garden real estate, with its incredible views down-Canyon to the Harbor and out to the Islands, and in the opposite direction toward La Cumbre Peak and the surrounding mountains of our beautiful Front Country. This site should be set aside as a view/garden/trail locale, and vehicle parking reserved for less sensitive areas.



View from the Proposed Parking Area

- As the Garden's landscape architect, Isabelle Greene, noted, development of the Botanic Garden's 65 acres is heavily constrained by a variety of factors: steep grades, archaeological sites, deed restrictions, setbacks from the Canyon, etc. The actual area available for development constitutes but a tiny fraction of the Garden's total acreage. For every square foot of structure, parking, walkway, and roundabout to be constructed under these new expansion plans, there will be one square foot of space irrevocably lost for future use as a living, vital part of the Garden.

Our Association believes that the Garden's expansion plans are inconsistent with the Mission Canyon Specific Plan.

- a. Architectural mitigations – Since Santa Barbara Botanic Garden is a preeminent research institution, present a new prototype of the use of the proposed public buildings emphasizing “Living within Nature”.

Provide solar voltaic roof panels.

Provide passive heating and cooling solutions.

Provide an enhanced Indoor / Outdoor solution.

- b. Lighting mitigations -bring the present proposal up to meet and exceed the International Dark Sky Association and the new Title 24 night-scaping criteria.

No twelve foot tall light stanchions anywhere. Parking lots to have a maximum of .2 footcandles with 4.1 uniformity ratio.

No broadcast lighting anywhere.

No wall sconces of any kind.

No structural up-lighting of any kind.

No broadcast security alarms of any kind.

- c. Noise mitigations – special consideration of many ordinary machines will reduce pollution. Noise restrictions (45db CNEL) for the following:
- All air conditioner compressors shall be built within 6 foot tall, 4-walled yard areas.
 - All emergency generators shall be built within 6 foot tall, 4-walled yard areas.
 - All exterior turban fans in kitchens or exhaust, recirculating fans or pumps on roofs shall be built within 6 foot tall, 4-walled penthouse area.
 - All amplification systems should not be allowed.
 - Install a permanent noise monitor with the wheather station to confirm stable low noise environment.
- d. Scale / Bulk mitigations-daylight basements are encouraged wherever possible.
- e. Several buildings placed on the easterly Lotterhos ridge should consider for “Off Site” provisions to reduce the cascade of buildings obscuring ocean views from established demonstration gardens.

- Biological Resource

- a. Fencing mitigations - no fencing at tributary watersheds to Mission Creek. Closing of migration paths would have devastating environmental consequences to animal life.
- b. Historic meadow mitigations- reinstate native only plantings, eliminate pavers intruding into meadow realm.

- Watershed Resources

- a. Impervious paving mitigations - eliminate all impervious paving.
- b. Utilize “Infiltrator system where feasible to compensate for additional surface run off.
- c. Submit proof of existing Deed to Riparian Rights. All nonconforming condition must be brought up to approved standards.
- d. Prove that the proposal presents no additional burden on the water pressure during the initiation of in the approx. new proposed square footage.

- Geographical Resource

- b. Box canyon mitigations – without a second means of existing, it would be a gross oversight to implement an expanding attendance capacity.
Eliminate the 2% annual accruing criteria. Limited egress means limited occupancy. Thereby, occupancy is fixed, not accretive expansion.
- c. Visitation mitigations - Out of 4,900 annual car visits, 2,000 are from “Private Parties” this is too invasive, eliminate “non-education“ related activities from Mission Canyon. A clear definition of Private parties is necessary for future neighborhood relationships with the garden. Does private mean activities conducted beyond the SBBG mission statement?

- Geological Resource

- a. Steep 20%+ hillside modification mitigations –

Retaining Walls Appearance- since 656 cu. yards of soil would be displaced, restrict visually exposed retainage of hillside to be constructed from indigenous stone material, rip rap and dry laid stone battered walls only.

- Cultural Resources

- a. Fire protection-mitigations

- Eliminate the existing deadwood in the east riparian zone of the Hansen site.

- Improve the proposed line of sight for the Hansen exit onto Las Canoas Road. Realistically, improve the existing width of Las Canoas connecting the new driveway to Mission Canyon Road.

- Historic Resources

The association strongly feels an emphasis needs to be proposed under this heading, whereby, distinctions in use on the grounds be clearly drawn. Presently, incompatible interests are commingled at the expense of both uses, natural cultivated. We encourage:

“Passive Rural” zones:

All demonstration gardens shall be implemented as passive areas where aesthetics prevails overall. These are places for study of plants, nature in its interpreted ‘original’ state and the connection to each other. The environment needs to be unstructured, un-rhetorical and most of all, natural seeming.

“Active Urban” zones:

All courtyards and terraces shall exhibit functions, permanent and temporary, all sales functions, all food and assembly areas shall be implemented as active areas. These are places for gathering in mass, discussions, sharing contemporary ideas cluttered with memorial donor plaques and current interests. The environment needs to be cultivated, cloistered and most of all accessible.

Meadow mitigations - Reinstatement the historic meadow as an exclusively passive rural demonstration garden. Per its Historic Landmarks Designation, no sculptures and art installations, no weddings, no temporary structures, no educational displays, kiosks, or structures, no donor paraphernalia. This site is the garden’s traditional mascot and should be restored and upheld with reverence for its aesthetic confirmation of nature.

Restore meadow (including pathways) to the original and historic landscape design by renown Landscape Architect(s)..

- LAND USE RESOURCES

Since approximately 29,000 square feet of net new structures is being proposed, growth is inherent. To mitigate this inherent conflict with the neighborhood we propose the following:

Special Events mitigations – It is vital that oversight of the garden’s use be implemented for the duration of the C.U.P. An assigned paid “Monitor” should be implemented to oversee the schedule of proposed events with garden staff, confirm their event permits and report monthly to the Mission Canyon Association

Any mishandlings of events shall be reported and archived to the Santa Barbara County Planning Department in a standing case file for future review.

Duration of use – Due to the returning inhabitants to the canyon, no fundraising or private events shall be held Monday through Thursday after 7 pm. Private parties or

fundraising events shall not increase in frequency, maintain 2-4 per year. Reduce maximum capacity to 150 people.

Allow only 2-4 per year fundraising event parties that solely benefit the Botanic Garden. Limit attendance to 150 people per event.

Definition of Use – In order to assess the proposed schedule from year to year, please draw explicit distinctions and definitions between the following activities:

Plant Sales	2/year
Art/Crafts Sales	2/year
Community Festivals	2/year
Fundraising	6/year
Community Group meetings	12/year
Private Parties	0/year
Symposia and Workshops	2/year
Classes vs. Workshops vs. Sessions	
Recognition events or ceremonies	3/year
Commercial Activities – All trade deliveries shall be after 8 am.	

Enable the Mission canyon Association to have an oversight process when changes in the defined uses of the garden are creating a conflict.

- Transportation Circulation Resources

Although the daily average visitation rate is 304 people, the garden has a spike in activity during the spring and will be doubling their built public environments. Therefore, special consideration for exception volume needs to be mitigated.

Mission Canyon turn around

Las Canoas widening from M.C. Rd. to new driveway

New Guild House parking entrance should align with Las Canoas Road.

Tunnel Road/Mission Canyon Road intersection:

Provide a bike path along garden property at the steep Tunnel Road incline shoulder to reduce bicycle danger.



Please call Ginger Sledge at 898-8650 or Tim Steele at 965-3888

For future reference, the Mission Canyon formally requests copies of the material passing back and forth in the future between P&D and the Botanic Garden. As the representative of Mission Canyon and its 4,000 residents for the past fifty years, and as direct participants in the review process on this particular CUP application since its initial filing in February 1999, we have earned stakeholder status and should be kept apprised of developments as they occur.

The mailing address for our organization is:

Mission Canyon Association
PO Box 401
Santa Barbara, CA 93101-0401

Thank you for your help.

MISSION CANYON ASSOCIATION

By: _____
Tim Steele

cc:

Case File (Alex Tuttle)
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