



City of Santa Barbara
Community Development Department

Memorandum

DATE: November 24, 2020

TO: Planning Commission

FROM: Stephanie Swanson, Associate Planner

SUBJECT: Public Comment re: the Ortega Park Master Plan Draft Mitigated Negative Declaration

On November 8, 2020, Heal the Ocean submitted a comment letter on the Draft Mitigated Negative Declaration (MND) for the Ortega Park Master Plan.

The comment letter is attached to the Final MND as Attachment 15 and largely discusses concerns regarding the Soil Management Plan, construction nuisances related to soil removal, and the proposed synthetic turf field.

The County of Santa Barbara Environmental Health Services (EHS), RRM Design Group, Rincon Consultants, Shaw Sports Turf, and the Santa Barbara County Air Pollution Control District all responded to Heal the Ocean's public comment letter. All the response letters are attached to this memo.

Below is a brief summary of each response letter.

After reviewing the comment letter and the response letters, Planning Staff found that no edits to the MND were required in response to the Heal the Ocean letter.

EHS

EHS's conditional approval includes testing and confirmation sampling. The extent of contamination will not be fully known until excavation and testing begins.

EHS is supportive of the submitted phased construction plan, with remediation excavation occurring during Phase 2 of the project's construction, in conjunction with building demolition, grading, and turf installation. The proposed method "is likely the most cost effective approach to properly handle and dispose of excavated impacted soils and to provide a safe separation distance from soils impacted with non-volatile contaminants" (p. 2). Further, grouping demolition and soil remediation will allow greater access to knowing the full extent of soil contamination.

EHS does recommend the applicant continue working with the Regional Water Quality Control Board regarding stormwater issues.

RRM Design Group

RRM Design Group (RRM) references the submitted on-site Stormwater Quality Report (Attachment 12 of the MND) to highlight that infiltration underneath the synthetic turf field is proposed. RRM confirms that the proposed synthetic turf was not treated the same as natural turf or other proposed landscaping when stormwater calculations were conducted.

RRM also highlights community outreach efforts during the park's conception; both synthetic and artificial options were suggested, and the public supported synthetic turf. RRM supports synthetic turf due to maintenance concerns that have previously led the existing natural turf to be closed, and also pointed to many examples in Southern California, including San Marcos High School and UCSB in the Santa Barbara area as examples of successful synthetic turf installation.

Rincon Consultants

Rincon Consultants (Rincon) echoed EHS' comments regarding the proposed excavation and disposal method being "the most feasible remedial approach" (p. 2). Rincon's response does note that sensitive site areas will be identified prior to the commencement of excavation activities (p. 3), but there is not a definitive requirement to do so.

Rincon also supported the proposed Soil Management Plan, saying, "The current project planning is being performed and the CAP/SMP presents a methodology designed to minimize the potential for work stoppages and project delays" (p. 4), and also highlights the positivity of the overall project's inclusion of soil remediation in that "The site has been a park for greater than 90 years and is not under any orders to be remediated," (p. 5) but will be as part of the project.

Shaw Sports Turf

Shaw Sports Turf (Shaw) noted the positive aspects of synthetic turf, including no heavy irrigation or pesticides, durability under high traffic use, and the ability to recycle the field components at the end of the field's lifespan.

Air Pollution Control District

The Air Pollution Control District (APCD) offered comments on the MND's air quality section; however, they were issued outside of the MND comment window and therefore not incorporated into the Final MND.

Planning staff incorporated data from the applicant's grading plan, specifically 480 cubic yards of import and 10,120 cubic yards of export, to analyze air emissions for construction. Per the CalEEMod User Guide, this will result in 633 truck trips over the 8-month construction period for grading and demolition (Phase 2 of the applicant's construction plan). Based on the CalEEMod User Guide, Planning staff entered the

import/export figures with the expectation that the haul trips are incorporated. After APCD reviewed the data, a software output error was discovered that confirmed haul trips were not incorporated. However, APCD staff did confirm that the emissions calculated for the MND were well below the thresholds (7.14 ton/year with APCD threshold of 25 tons/year), and changing the value of those haul trips is not expected to result in an exceedance of Air Quality and GHG thresholds.

APCD recommended a condition of approval related to asbestos removal and noted that an Authority to Construct permit from APCD will be required. These recommendations have been added to the draft conditions of approval.

Attachments:

- a. Environmental Health Services Response Letter, dated November 12, 2020
- b. RRM Design Group Response Letter, dated November 11, 2020
- c. Rincon Consultants Response Letter, dated November 11, 2020
- d. Shaw Sports Turf Response Letter
- e. Air Pollution Control District Response Letter, dated November 13, 2020