

November 13, 2020

Stephanie Swanson  
City of Santa Barbara, Planning Division  
P.O. Box 1990  
Santa Barbara, CA 93102

**Re: Santa Barbara County Air Pollution Control District Comments on the Draft Mitigated Negative Declaration on 604 East Ortega Street – Ortega Park Master Plan, PLN2019-00425**

Dear Stephanie Swanson:

The Santa Barbara County Air Pollution Control District (District) has reviewed the Draft Mitigated Negative Declaration (DMND) for the reference project, which consists of the demolition of existing facilities and the subsequent construction of a 26,870 square-foot (SF) aquatics facility, a skate park, an 11,730 SF playground, sports field with synthetic turf, and buildings for restrooms and maintenance. On-site improvements such as fencing, parking, landscaping, dumpsters, and related enclosures, and internal walkways are also proposed. Right-of-way improvements including street parking, parking medians, and sidewalk installations are also proposed. Grading is estimated at 10,600 cubic yards (CY) of cut, 480 CY of fill, and net export of 10,120 CY of soil that would be hauled offsite. Of the 10,120 CY total export, approximately 1,870 CY is clean soil and 8,250 CY is contaminated soil. The subject property, a 5.46-acre parcel zoned P-R and identified in the Assessor Parcel Map book as APN 031-172-002, is located at 604 East Ortega Street in the City of Santa Barbara.

Air Pollution Control District staff offers the following comments on the DMND:

1. **Section 3.b Air Quality/Greenhouse Gas Emissions, Air Pollutant Emissions and Cumulative Impacts, Page 19.** This section should include a discussion and analysis of the impacts from the haul trips required for soil export. Currently, the CalEEMod modeling (as shown in Attachment 6) does not account for the emissions from these trips. The emissions from these trips should be included in the project's construction emissions summary (Table 2).
2. **Section 3 Air Quality/Greenhouse Gas Emissions, Air Quality and Greenhouse Gas Emissions – Mitigation and Applicable Standard Conditions of Approval, Page 21.** The following conditions should be included in the standard conditions of approval listed on page 21 and in Attachment 2: *Conditions, Air Quality:*
  - a. The applicant is required to complete and submit an **Asbestos Demolition/Renovation Notification or an EXEMPTION** from Notification for Renovation and Demolition (District Form ENF-28 or District Form ENF-28e), which can be downloaded at [www.ourair.org/compliance-forms](http://www.ourair.org/compliance-forms) for each regulated structure to be demolished or renovated. Demolition notifications are required regardless of whether asbestos is present or not. The completed exemption or notification should be presented, mailed, or emailed to the District with a minimum of 10 working days advance notice prior to

**Aeron Arlin Genet**, Air Pollution Control Officer

disturbing asbestos in a renovation or starting work on a demolition. The applicant should visit [www.ourair.org/asbestos](http://www.ourair.org/asbestos) to determine whether the project triggers asbestos notification requirements or whether the project qualifies for an exemption.

- b. The proposed project includes the excavation (“dig-and-haul”) of more than 1,000 cubic yards of contaminated soil. Therefore, the project will be required to obtain an Authority to Construct (ATC) permit from the District prior to building permit issuance. Proof of receipt of the required District permits shall be submitted by the applicant to planning staff. The applicant should visit [www.ourair.org/permit-applications](http://www.ourair.org/permit-applications) to download the necessary permit application(s).

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8873 or via email at [HoD@sbcapcd.org](mailto:HoD@sbcapcd.org).

Sincerely,

*Desmond Ho*

Desmond Ho  
Air Quality Specialist  
Planning Division

cc: Planning Chron File