

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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Mayor Al Clark  
City of Carpinteria  
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Carpinteria, CA 93013

Dear County of Santa Barbara Planning Department and Carpinteria City Council:

**RE: Bailard Multi-Family Development – Letter of Technical Assistance**

This letter provides technical assistance to the City of Carpinteria (City) and County of Santa Barbara (County) regarding the development at 1101 and 1103 Bailard Avenue (project) proposed by The Housing Authority of the County of Santa Barbara and Red Tail Multi Family Land Development LLC (collectively the “applicant”). The applicant requested assistance from the California Department of Housing and Community Development (HCD) regarding the County’s and City’s concerns with access to the site, as well as concerns the City has regarding the appropriateness of the site being included in the County’s upcoming Housing Element Site Inventory update. As part of its review, HCD staff conducted multiple interviews with the applicant, County planning staff, City planning staff, and California Coastal Commission staff.

Based on the letter of public record sent from the City Council to the County’s Board of Supervisors on August 28, 2023, and discussions with the involved parties, HCD understands that the City is concerned with the project’s location and its ability to meet the County’s adopted policies. After review, HCD has determined there is nothing that should prevent the County from including the site in its Housing Element Site Inventory if it deems it appropriate in contributing to the County’s Regional Housing Needs Allocation (RHNA). Ultimately, the County has the authority to select which sites to include in its inventory. **The site appears to play a critical role in the County’s Housing Element Site Inventory given its location near Carpinteria in the unincorporated “South Coast” portion of the county, where suitable sites are more limited. The County’s housing element indicates a history of the “North County” producing more affordable housing than the South Coast and**

removing the site from the inventory in this high resource area would be a significant loss. Furthermore, the County already has a development proposal for 173 units, including 41 deed-restricted units. If the site were to be removed from the inventory, it would need to be replaced with a site of similar unit capacity, development readiness, and locational significance. Please note that including a site in the inventory does not automatically exempt a project from being subject to the California Environmental Quality Act (CEQA), Coastal Commission policies, and other local policies.

The applicant also inquired about the City's and County's roles in approving an encroachment permit for access to the site. HCD understands that the original submittal included primary access from a five-way intersection at Bailard Avenue and Pandanus Street, which is currently a four-way intersection. County staff have suggested constructing a roundabout as an alternative to the five-way intersection. HCD encourages the applicant to continue to work with the County to find an appropriate configuration for primary access to the site. Secondary access would be gained from Pandanus Street, which is within the City's boundaries. City staff have indicated that once the project has been approved by the County, all required City encroachment permits for Pandanus Street will be ministerial and should not require additional discretionary review. HCD reminds the City that a ministerial permit application that meets all objective criteria must be approved in a timely fashion.

In summation, HCD supports the County's authority to include the site in the inventory as a way to provide affordable units to an area of particular need and encourages continued collaboration between the applicant, City, County, and Coastal Commission in addressing potential concerns.

If you have any questions regarding the content of this letter or would like additional technical assistance, please contact Bentley Regehr at [bentley.regehr@hcd.ca.gov](mailto:bentley.regehr@hcd.ca.gov).

Sincerely,



Shannan West  
Housing Accountability Unit Chief