

de la Guerra, Sheila

Public Comment



#7

From: Linda Honikman <linda.honikman@gmail.com>
Sent: Monday, June 26, 2023 4:51 PM
To: sbcob
Cc: Jordan Killebrew; Henson, Chris; Daniela Aguirre; Spencer Brandt; Vicki Allen
Subject: LWVSB comments on Addendum 7 - ordinance first reading - Just Cause residential evictions
Attachments: Just Cause Amendments 6_27(final).pdf

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Please distribute to the Board of Supervisors. Thank you!

Linda Honikman on behalf of League of Women Voters of Santa Barbara

(805) 683-0408 cell (8am-8pm PST)



June 26, 2023

Dear Chair Williams and Board of Supervisors,

The League of Women Voters of Santa Barbara (LWVSB) is grateful for the quick action taken by the Board of Supervisors and County staff on April 6 of this year to strengthen Article IV of the ordinance titled, Just Cause for Residential Evictions (County Code Chapter 44). We also applaud the County for holding a first reading on additional amendments to this ordinance on Tuesday, June 27.

For the reasons outlined below, we support the staff’s recommendations to add language to the existing ordinance that: 1) requires landlords to offer tenants a one-year lease, 2) allows tenants the right of first refusal to return to their apartments, and 3) clarifies what constitutes a “substantial remodel,” namely one that is meant to improve compliance with health and safety laws. We also suggest two additional recommendations which we explain at the end.

Lower-Income Housing in Greatest Need and Most at Risk of Conversion. In light of the County’s affordable housing crisis, the LWVSB believes that an expeditious and decisive action on this ordinance is warranted. For the 2023-31 Housing Element Cycle, most of the County’s housing needs are for the labor force and vulnerable residents who earn below 120% of the area median income. According to the County’s 6th Cycle Regional Housing Needs Allocation (RHNA), 68% of the County’s housing needs fall into the moderate to very low income level (see Figure 1).

Figure 1:
County’s Greatest Housing Needs are for Affordable Housing, not Market Rate Housing

Table 2-4. Unincorporated Santa Barbara County 6th Cycle (2023-2031) RHNA

Sub-Region	RHNA Allocation	RHNA Allocation by Income Level			
		Very Low	Low	Moderate	Above Moderate
South Coast	4,142	809	957	1,051	1,325
North County	1,522	564	243	229	486
Total	5,664	1,373	1,200	1,280	1,811

Source: SBCEAG 2021b

3,853 units or 68% of the County’s housing needs fall into the moderate to very low income category (below 120% area median income).

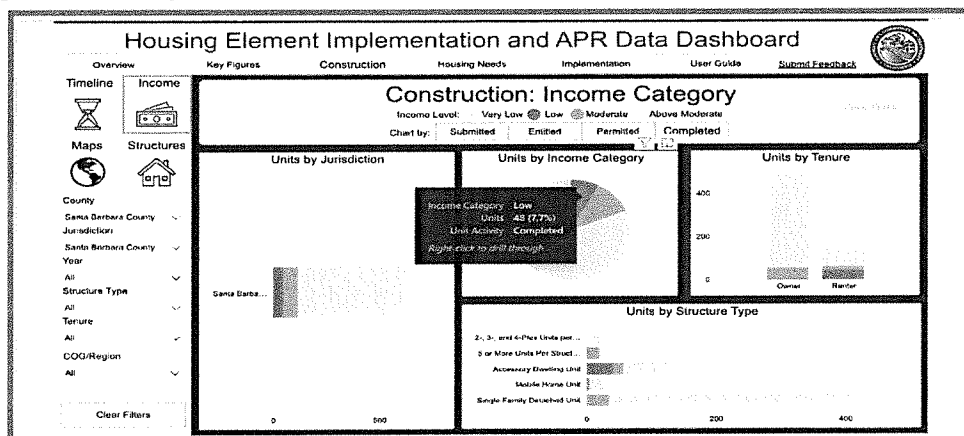
Source: County of SB, 2023-31 Housing Element Update

Ideally, nonprofits and the Housing Authority can build new deed-restricted apartments or purchase and rehabilitate older, unregulated apartments and make them deed-restricted. Deed-restricted apartments are price-controlled in perpetuity for lower income workers and residents. Unfortunately, public subsidies have dwindled and become more competitive to obtain, so nonprofits and the Housing Authority struggle to compete with outside corporations to purchase these cheaper apartment buildings. As a result, naturally-occurring affordable housing is being converted into expensive, market rate housing and the County is losing ground in maintaining its affordable housing stock.

This situation happened in Isla Vista and is not unique to this area. According to a March 2023 report by the California Housing Partnership (CHP), the state's unregulated, low income housing has "increasingly been the target for acquisition and conversion by for profit entities seeking to maximize rent (p.1)." The report estimates that between 2020-22, over 120,000 naturally-occurring affordable homes throughout the state have been lost to such corporate conversions (pp. 1-2). Currently, the County of Santa Barbara has nearly 7,000 units of unregulated, naturally affordable low-income housing in multi-family buildings and CHP warns that about 2,000 of those low-income units (80% AMI) are at immediate risk of conversion to high-priced, market rate rentals (see Appendix B of the CHP report).

County is Losing Ground in Maintaining Existing Affordable Housing Stock. To put these figures in context, between 2018-22 the County (unincorporated areas) only built or completed 48 low income units. As you will see from Figure 2 below, California's Department of Housing and Community Development low income housing (blue) is being produced at a much lower rate than above moderate income or market rate housing (yellow). There were 506 units of market rate housing built during this same time period. Given that 2,000 units of low income housing are at risk of market rate conversion and how long it takes to build just a little amount of low-income housing, the County should be employing every strategy available to stop corporate conversions and protect the rights of our low income workforce, elderly and residents who are also most at risk of becoming homeless.

Figure 2: County of SB (Unincorporated) Completed Housing Units from 2018-2022



Source: CA Housing and Community Development, 2023

Recommend Further Ordinance Clarification. In addition to approving the staff's proposed amendments, we encourage the Board of Supervisors to discuss the implications of adding more clarification to the ordinance that:

- 1) Caps the amount of rent increase a landlord can charge when a tenant wants to return after a remodel, and
- 2) Provides protections to tenants throughout the eviction process.

We acknowledge that such a discussion is complex and may require continuation to the Second Reading of the Ordinance on July 11. Such an extra step will serve to further strengthen and support the intent of the existing just cause eviction ordinance. In the end, better tenant protection laws help to limit displacement and homelessness. They also create a more robust, affordable housing infrastructure that is critical to maintaining a diverse, environmentally-sustainable and economically-thriving County.

Thank you for your consideration of our comments.

Respectfully yours,

A handwritten signature in black ink that reads "Vicki Allen". The signature is written in a cursive, flowing style.

Vicki Allen
VP of Communications on behalf of the Leadership Team