



December 2, 2008

Santa Barbara County Board of Supervisors
Attn: Chairman Salud Carbajal and Board of Supervisors
Fourth Floor
105 E. Anapamu St.
Santa Barbara, CA 93101

RE: Housing Element and EIR: Abrupt Switching of Key Site 16 for Key Site 30 Without Public Notice

Dear Chairman Salud Carbajal and Board of Supervisors:

Housing advocates who have been involved throughout the Santa Barbara County 2003-08 General Plan Housing Element update submit these additional comments on the Housing Element, Focused Rezone and Environmental Impact Report because we believe that the Santa Barbara County Planning Commission on Nov. 12 acted against the public interest when it switched sites to be rezoned in order to meet the county's Regional Housing Needs Allocation.

The agenda and staff report called for the commission to consider rezoning Key Sites 3 and 30. All but three pages of the environmental impact report focused on those two sites. However, the commission switched to Key Sites 3 and 16 at the meeting without giving either the public enough advanced notice to comment on Key Site 16 and not allowing either the public or the commission to give Key Site 16 the required thorough environmental analysis that Key Site 3 and Key Site 30 received.

Key Site 16 has serious environmental problems, including possible soil contamination and a greater exposure for residents to wildland fire hazards than sites 3 and 30. Site 16 also poses an increased threat to wildlife movement corridors and habitat. These issues or mitigations for them have not been explored. A site with soil contamination and serious fire threat in a county where wildland fires are all too common is inappropriate for affordable housing. It certainly should not have been recommended for rezoning to higher density residential usage to the Board of Supervisors without the same level of review afforded to the previously selected sites. It is not the county's normal policy to rely on only a three-page section of an EIR to measure the development potential of sites.

Unfortunately, this seems like another example of the county failing to make a good faith effort to rezone adequate sites for affordable housing, as state law requires. It is another example of the county unilaterally throwing out viable sites that had been through rigorous environmental review and were ready to develop in exchange for sites of dubious ability to produce affordable units.

This is the second instance where the public process was circumvented. The county did the same thing last year when it suddenly and without public input stopped an environmental review of potential sites throughout the county and concentrated 867 affordable homes in Isla Vista, a college community with high rents and little likelihood that low income families would be able to live in the units on the sites that the county is zoning. The motivation for these actions is uncertain and raises fair housing implications because of the populations that might be excluded from housing based on their race or national origin, or the size of their families.

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The county has again not acted professionally and responsibly toward gathering public input or meeting the mandates of State Housing Element law.

We recommend that the Board of Supervisors not approve this focused rezone on Key Site 16 and send it back for a more thorough environmental analysis and more opportunity for public input. We also recommend that Key Site 30 be rezoned.

It included an affordable senior citizen housing component in the development plan. It has gone through an environmental impact report, public hearings, has utilities to the site, and has received a notice that the application is complete for processing by the county. All engineering, grading plans, special studies, architecture and utilities plans are complete. It could be under construction within a year to 18 months and be providing the affordable housing the county needs and is legally required to provide in a meaningful way.

If the Board of Supervisors will not rezone Key Site 30, it should publicly explain the rationale for eliminating a site with a viable affordable project that is ready to go in exchange for one that may be unable to produce any housing due to potential problems with hazardous substances and soil contamination.

Sincerely yours,



Jerry Bunin
Government Affairs Director
Home Builders Association

On behalf of the Affordable Housing Coalition:
Coastal Housing Coalition
California Rural Legal Assistance
Home Builders Association

CC: Lynn Jacobs, Director California Housing and Community Development Department
Cathy Creswell, Deputy Director California Housing and Community Development Department
Paul McDougall, Housing Policy Manager California Housing and Community Development Department

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