

COUNTY PLANNING COMMISSION
2024 Comprehensive Plan Annual Progress Report

Hearing Date: February 26, 2025

Staff Report Date: February 18, 2025

Case No.: N/A

Environmental Document: Notice of Exemption, California Environmental Quality Act (CEQA) Guidelines Sections 15060(c)(3) and 15378(b)(5)

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1.0 REQUEST, RECOMMENDATION, AND PROCEDURES

Staff is requesting that the County Planning Commission receive and file the *2024 Comprehensive Plan Annual Progress Report*. Staff recommends that the County Planning Commission follow the procedures outlined below in order to provide by April 1, 2025, the *2024 Comprehensive Plan Annual Progress Report* to the Board of Supervisors (Board), Governor's Office of Land Use and Climate Innovation (LCI), California Department of Housing and Community Development (HCD), and City of Santa Barbara. Your Commission's motion should include the following:

1. Receive and file a staff report regarding the *2024 Comprehensive Plan Annual Progress Report* (Attachment A);
2. Determine that the County Planning Commission's actions regarding the *2024 Comprehensive Plan Annual Progress Report* are not subject to the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Sections 15060(c)(3) and 15378(b)(5); and
3. Direct staff to provide the *2024 Comprehensive Plan Annual Progress Report* to the Board of Supervisors (Board), Governor's Office of Land Use and Climate Innovation (LCI), and California Department of Housing and Community Development (HCD), pursuant to Government Code 65400, and to the City of Santa Barbara, pursuant to the Board's action to adopt the *Mission Canyon Community Plan* (April 1, 2014).

Please refer the matter to staff if your Commission takes other than the recommended actions for the development of appropriate materials.

2.0 JURISDICTION

Government Code Section 65400(a) states that each city and county planning agency shall:

... [p]rovide by April 1 of each year an annual report to the legislative body, the Office of Planning and Research, and the Department of Housing and Community Development that includes all of the following:

(A) The status of the plan and progress in its implementation.

(B) The progress in meeting its share of regional housing needs ... and local efforts to remove governmental constraints to the maintenance, improvement, and development of housing

...

(F) The degree to which its approved general plan complies with the guidelines developed and adopted pursuant to Section 65040.2 and the date of the last revision to the general plan.

For purposes of Government Code Section 65400(a), Santa Barbara County Code Section 2-25.69 establishes the Board as the legislative body for the County of Santa Barbara (County), and Section 2-25.1 establishes the County Planning Commission as the planning agency on matters that affect the entirety of the unincorporated county. As a result, the County Planning Commission must review, file, and provide by April 1 of each year the annual progress report to the Board, LCI, and HCD.

3.0 SUMMARY

The *2024 Comprehensive Plan Annual Progress Report* serves two key functions. First, it summarizes the projects that the Planning and Development Department (P&D) undertook in 2024 to maintain and implement the Comprehensive Plan, including the 2023-2031 Housing Element Update, which was adopted by the Board of Supervisors on December 5, 2023 and received its final compliance determination from State HCD on January 22, 2024. The 2023-2031 Housing Element Update contains 25 programs and 99 actions to help meet the housing goals and needs of the unincorporated county. The County made significant progress implementing several of these programs in 2024. The County also initiated updates to the Circulation Element and Open Space Element, and continued work on updates to the Seismic Safety and Safety Element and the new Environmental Justice Element. The County also initiated and completed Energy Element updates, agricultural enterprise ordinance amendments, and various housing bill ordinance amendments in 2024.

Second, the *2024 Comprehensive Plan Annual Progress Report* discusses the County's progress in meeting its Regional Housing Needs Allocation (RHNA) in the second year of the current 2023-2031 planning period. The allocation for the unincorporated areas of Santa Barbara County for the 2023-2031 RHNA projection period is 5,664 housing units. For the first time, the Santa Barbara County Association of Governments (SBCAG) apportioned the County's RHNA into two sub-regions – South Coast and North County. The County must accommodate 74 percent (4,142 units) of its RHNA in the South Coast and 26 percent (1,522 units) of its RHNA in the North County. Section 4.3, below, further discusses the County's RHNA progress by income level.

4.0 PROJECT INFORMATION

4.1 Comprehensive Plan Implementation

The *2024 Comprehensive Plan Annual Progress Report* shows that the County continues to make progress toward maintaining and implementing the Comprehensive Plan. In 2024, the County continued to maintain and implement the 2023 – 2031 Housing Element Update, draft updates to the Safety Element, draft the new Environmental Justice Element, the 2030 Climate Action Plan and associated

update to the Energy Element, initiated updates to the Circulation Element and Open Space Element, and prepared various zoning ordinance updates including the Agricultural Enterprise Ordinance Amendments, the Airport Land Use Consistency Amendments, the Annual Zoning Amendments Package, the Cannabis Ordinance Amendments, the Childcare Facilities Zoning Ordinance Amendments Package, the Utility Scale Solar Ordinance Amendments, and other zoning ordinance amendments streamlining permit processes. For more information on the Comprehensive Plan updates, see Attachment A, *2024 Comprehensive Plan Annual Progress Report*.

In 2024, the County also made significant progress in implementing several of the 2023-2031 Housing Element Update’s programs and actions. In particular, the following table lists and summarizes the Housing Element programs and actions that the County initiated or completed in 2024:

Table 1 Programs and Actions Initiated or Completed in 2024		
Program	Action	Status
1	Select County-owned sites to accommodate RHNA plus buffer.	Complete
1	Rezone sites to accommodate RHNA plus buffer.	Complete
1	Revise development standards to ensure maximum densities.	In Process
1	Establish minimum densities for residential rezones.	Complete
1	Develop RHNA/No Net Loss tracking tool.	In Process
2	Update zoning ordinances to allow use by right (GC 65583.2(c)).	Complete
3	Update inland zoning ordinances unit replacement requirements.	Complete
4	Update and amend Inclusionary Housing Ordinance (IHO).	In Process
4	Report (annually) the effectiveness of the IHO.	Ongoing
5	Tools and incentives for high-quality affordable housing.	In Process
6	Collaborate with developers and employers for workforce housing.	Ongoing
7	Coordinate with stakeholders to secure funds from Project Homekey.	Ongoing
8	Increase permanent units and rental subsidies for homeless persons.	In Process
8	Coordinate/improve scoring on multifamily funding applications.	Ongoing
8	Increase funding for housing and services, with healthcare partners.	In Process
8	Create potential site inventory for homeless housing projects.	Complete
8	Centralize landlord engagement to secure rental units with vouchers.	Complete
9	Amend definition, standards, procedures for emergency shelters.	In Process
10	Amend zoning ordinances to comply with new ADU laws.	In Process
11	Adopt ordinances to implement Senate Bill 9.	In Process
12	Select County-owned sites for development.	In Process
12	Prioritize County-owned sites for development.	In Process
13	Amend zoning ordinances to comply with new SDBL.	In Process
13	Consider a density bonus program for moderate-income housing.	In Process
14	Participate (annually) in Groundwater Sustainability Plan.	Ongoing
15	Provide the 2023-2031 HEU to public water and sewer providers.	Complete
16	Amend ordinances per new state laws; special care homes, shelters.	In Process
16	Amend MLUDC and CZO to provide ministerial approval per SB 35.	In Process

16	Add Objective Design/Development Standards to MLUDC and CZO.	Complete
16	Amend (annually) zoning ordinances to comply with new state laws.	Ongoing
16	Facilitate/streamline multifamily housing in commercial zones.	In Process
16	Suspend the Montecito Growth Management Ordinance	Complete
17	Promote (annually) fair housing choice and outreach programs.	Ongoing
17	Require (annually) fair housing legal services to include outreach.	Ongoing
17	Assist (annually) 75 residents with fair housing/dispute services.	Ongoing
18	Monitor (annually) the status of at-risk rental housing projects.	Ongoing
18	Pursue (annually) funding to extend adorability covenants.	Ongoing
18	Conduct outreach to acquire units aging out of low-income use.	Ongoing
18	Provide fact sheets on tenant rights and relocation assistance.	Ongoing
20	Process grant applications to maintain/rehab low-income housing.	Ongoing
20	Assist (annually) in the rehabilitation of 30 units.	Ongoing
21	Study the development of a local preference ordinance.	In Process
22	Consider reduced Dev. Impact Fees and adopt the Recreation Master Plan.	In Process
23	Complete a workforce housing study.	In Process
25	Implement (annually) the EJE, ATP, and Recreation Master Plan.	In process
25	Seek funding for revitalization of low-income communities.	Ongoing

In addition, the Community Services Department, Housing and Community Development Division, continues to coordinate with P&D to maintain and implement Housing Element programs. The County’s Housing and Community Development Division is assisting in the implementation of 50 actions for this eight-year cycle. In 2024, the division took steps to implement 11 programs. These programs include providing more housing and services to the unhoused and promoting affordable housing opportunities. Table D of Attachment 1 of this annual progress report provides information on this significant progress.

4.2 Reporting Requirements and HCD Data Tables

Government Code Section 65400(a)(2)(B) requires that annual progress reports use tables and forms adopted by HCD to summarize housing activities throughout the reporting period. These tables set forth the following planning and building permit information:

- Housing development applications received;
- Units included in all development applications;
- Units approved and disapproved;
- Sites rezoned to accommodate that portion of the Cities’ or County’s share of their RHNA for each income category that could not be accommodated on sites identified in the housing element site inventory;
- New units that have been issued a completed entitlement, building permit, or certificate of occupancy thus far in the housing element cycle, and the income category of each unit; and

- Information on all housing development applications submitted, including the location and income category of developments approved, building permits issued, and units constructed pursuant to Government Code Section 65913.4.

See Attachment A, *2024 Comprehensive Plan Annual Progress Report*, for this reporting data.

4.3 RHNA Progress

Annual progress reports track annual housing production to show the County’s progress in meeting its RHNA. Table 2 and Table 3 below list the number of building permits the County issued in 2024 for new residential units (organized by income category) within the unincorporated areas of the South Coast and North County. The final row of the table lists the County’s 2023-2031 RHNA.

The County issued building permits for 400 units in 2024. Of the 400 units, 290 were located in the South Coast and 110 were in North County.

Table 2 South Coast 2023 to 2031 RHNA Projection Period Residential Units by Income Category (Issued Building Permits)					
Year	Very Low	Low	Moderate	Above Moderate	Total
2023	0	0	0	85	85
2024	3	54	3	230	290
RHNA	809	957	1,051	1,321	4,142

Table 3 North County 2023 to 2031 RHNA Projection Period Residential Units by Income Category (Issued Building Permits)					
Year	Very Low	Low	Moderate	Above Moderate	Total
2023	0	68	9	80	157
2024	0	85	10	15	110
RHNA	564	243	229	486	1,522

As of 2022, annual progress reports now require a report on all units, not just net-new units. Demolished units that are associated with or replaced by a new housing development are now included and reported to State HCD.

In 2024, the County issued 31 building permits to reconstruct or replace existing units. Of these units, three of the building permits were for replacement mobile homes in the North County. The remaining 28 replacement units were located in the South Coast. In the South Coast, the County issued eight building permits to replace mobile homes, 17 building permits to replace single family dwellings that were demolished and rebuilt, and three building permits to replace multi-family dwellings. Two of these single-family dwellings were rebuilt from natural disasters, including the Jesusita Fire and debris flow. These 31 issued building permits for reconstructed or replaced housing are included in the totals reflected in Table 2 and 3 above.

4.4 Government Code Section 65913.4 Streamlined Ministerial Approval Process

In addition to amending annual progress report requirements, Government Code Section 65913.4 established a streamlined, ministerial approval process for qualifying housing developments in jurisdictions that have not met their pro-rata share of regional housing needs. In part, qualifying developments must be located on an urban infill site zoned for residential or mixed uses and provide at least 10 or 50 percent of the units for lower-income households.

As of June 2024, HCD determined that, based upon data from the *2023 Comprehensive Plan Annual Progress Report*, the County had not met its pro-rata share of very low- and low-income housing. As a result, the County is subject to the streamlining provisions for proposed developments with at least 50 percent affordability [Government Code Section 65913.4(a)(4)(B)(ii)]. In 2024, the County issued a building permit for a 24-unit affordable housing project subject to SB 35 (as of 2023 referred to as SB 423). The County remained subject to the streamlining provisions throughout 2024 and is expected to remain so through 2025.

4.5 Local and Regional Planning Grants

In early 2021, HCD awarded the County a Local Early Action Planning (LEAP) grant in the amount of \$423,500 to help cover the cost of the 2023-2031 Housing Element Update tasks in FY 2020-2021 through 2022-2023. The LEAP grant was in addition to a Regional Early Action Planning (REAP) grant that the Association of Monterey Bay Area Governments (AMBAG) awarded the County in December 2020, in the amount of \$164,403. The REAP grant covered certain costs associated with preparing the Housing Element Update through FY 2022-2023. The grants did not cover the cost of any tasks in FY 2023-2024.

5.0 ENVIRONMENTAL REVIEW

CEQA Guidelines Section 15060(c)(3) states that an activity is not subject to CEQA if the activity is not a project as defined in CEQA Guidelines Section 15378. Section 15378(b)(5) specifies that projects do not include organizational or administrative activities of governments that will not result in direct or indirect physical changes to the environment. Preparation of the *2024 Comprehensive Plan Annual Progress Report* is an administrative activity that does not authorize new development or otherwise result in direct or indirect physical changes to the environment. Therefore, the report is not a project as defined by CEQA Guidelines Section 15378(b)(5) and is not subject to environmental review pursuant to CEQA Guidelines Section 15060(c)(3).

6.0 NEXT STEPS

Staff will submit the *2024 Annual Progress Report* to the Board, LCI, and HCD by April 1, 2025.

Upon adoption of the Mission Canyon Community Plan in April 2014, the Board directed the Planning and Development Department "... to provide an annual report to the City of Santa Barbara detailing the major housing units that were approved or completed in the Mission Canyon Community Plan Area during the reporting year." Therefore, staff will also provide a copy of the *2024 Comprehensive Plan Annual Progress Report* to the City of Santa Barbara by April 1, 2025.

ATTACHMENTS

- A. *2024 Comprehensive Plan Annual Progress Report*

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