



From: Lindy Hatcher <lhatcher@hbacc.org>
Sent: Friday, April 26, 2024 6:41 PM
To: sbcob
Subject: April 30 Santa Barbara County Housing Element Rezone Sites
Attachments: 20240422-CHC Letter to BOS FINAL.pdf

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Dear Chair Lavagnino and Santa Barbara County Supervisors,

The Home Builders Association of the Central Coast is a nonprofit California 501(c)(6) membership organization comprised of builders, developers, construction companies, and all related building industry professionals in Santa Barbara and San Luis Obispo Counties. We educate, advocate, and effect change while giving back to the public through a variety of programs. We address the need for workforce housing and promote housing for all.

We wholeheartedly agree with the Coastal Housing Coalition’s letter supporting the following ideals:

- The County must permit development of housing at unprecedented rates to address the housing crisis impacting our community.
- Rezone all the suggested sites. As we know, just because a site is rezoned does not mean it will be developed with housing. It simply means we have opportunity for development. We ask you to not limit development opportunities during this extreme housing crisis.
- Rezoning is a critical first step but not a comprehensive policy solution to addressing our housing needs.
- We ask that you implement the following Housing Element programs as well:
 - Program 5: Tools and Incentives for High-Quality Affordable Housing
 - Program 6: Housing for Farmworkers and Other Employees
 - Program 13: Density Bonus Provisions
 - Program 16: Reduction of Governmental Constraint
 - Program 21: Local Preference
 - Program 22: Recreational Amenities for Housing Projects
 - Program 23: Workforce Housing Study
 - Program 24: Rental Housing Incentive Program

We are a resource with integral industry information locally, statewide through the California Building Industry Association, and nationally through the National Association of Home Builders. We look forward to meeting with each of you in the near future and forging a strong partnership with you through our newly revitalized Santa Barbara Government Affairs Committee.

Thank you for hearing our thoughts.

Lindy

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April 22, 2024

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Subject: Santa Barbara County Housing Element Update to Select Rezone Sites

Dear Chair Lavagnino and Members of the Board:

I submit this letter on behalf of the Coastal Housing Coalition (“CHC”), a nonprofit organization that advocates for workforce housing. My board is made up of land use and housing experts—planners, architects, developers, realtors, and other professionals that have been advocating for more housing on the Central Coast for two decades. We believe that the lack of available workforce housing at all income levels near jobs is adversely affecting our region’s economy, environment, and civic life, all of which will worsen if you do not address this crucial problem.

We have participated throughout the Housing Element process by hosting educational sessions on the Housing Element, meeting with community stakeholders, and voicing our opinion at this Board’s rezoning workshop. We submit this comment letter to continue to advocate for this Board to rezone all of the sites identified in the County’s Housing Element sites inventory. We explain the reasons supporting this position below.

THE COUNTY MUST PERMIT DEVELOPMENT OF HOUSING AT UNPRECEDENTED RATES TO ADDRESS THE HOUSING CRISIS IMPACTING OUR COMMUNITY

The jurisdictions within Santa Barbara County must plan for 24,856 housing units by 2031 to address the current housing crisis. The County is responsible for planning for a total of 5,664 units, 4,142 units in the South Coast and 1,522 units in North County. Ensuring our housing supply will meet our community’s needs requires unprecedented vision and planning.

Unfortunately, our community is severely underhoused because the County has never permitted housing development at a rate that meets demand. In the last housing element cycle (2015-2022), the County permitted just 1,926 units with only 725 of those being on the South Coast. In other words, the County permitted 90 units per year on the South Coast over the course of the last 8 years, which if continued will leave the County with a shortfall of 3,417 units on the South Coast over the course of the next eight years.

The County’s failure to permit housing is no secret. California YIMBY commissioned a report in the fall of 2023 to estimate “a ‘conversion rate’ for each city and county [in the State] that compares historical rates of housing permitting to potential market-feasible housing development opportunities, assuming no limitations due to zoning.” (Housing Underproduction in California, <https://cayimby.org/reports/housing-underproduction-in-california/>.) The report found that the County has the seventh “lowest conversion rate of housing development opportunities” in the State. (*Ibid.*)

This history of underdevelopment has led to drastic impacts to our community. Median home prices (presently more than \$2 million in the City of Santa Barbara) have more than doubled in nearly all jurisdictions since 2012, while vacancy rates have decreased 40 percent to 1.1 percent. These skyrocketing prices and lack of housing supply are shocking when compared to average median income—\$107,300 for a family of four. This has led to a drastic decrease in the family aged population (30-49) in the County according to a recent report by the Santa Barbara County Association of Governments (“SBCAG”). (Understanding Regional Travel Patterns Report, <https://www.sbcag.org/wpcontent/uploads/2024/01/UnderstandingRegionalTravelPatterns.pdf>.)

These impacts do not just tear at the threads of our community; they degrade our environment. For example, SBCAG found that 30 percent of workers commuting to Santa Barbara (and 43 percent commuting to Goleta) travel greater than 16 miles. SBCAG also found that 11,100 people commute daily to the County from Ventura. Locating homes nears jobs and reducing these long commutes is a key way we can achieve our lofty climate goals, preserve our local economy, and support families.

REZONING ALL OF THE SITES DOES NOT MEAN ALL OF THE SITES WILL BE DEVELOPED WITH HOUSING

Rezoning alone do not produce housing and you must not assume that all the housing projects presented at the workshop or otherwise will come to fruition. Project level review of the selected rezone sites will likely identify additional regulatory, environmental, and physical constraints that will likely further restrict achievable unit density and affordability levels. Housing development traditionally occurs at an extremely slow rate due to the entitlement/permitting process, environmental review, fluctuation in access to capital, cost of construction and financing difficulties as well as long construction timelines.

Accordingly, when deciding on which sites to rezone, it is important to consider the low success rate for housing projects in this community. There needs to be an ample supply of property zoned for housing because the process to develop housing itself is naturally a multi-year endeavor with low success rates, as mentioned above. Even if a site has the proper zoning for housing, the process and associated timeline at providing a unit for occupancy would realistically be 7+ years based on the following assumptions:

1. Conceptual Planning:	6 Months
2. Land Use Permit (LUP) Application Submittal:	6 Months
3. LUP Application Deemed Complete:	12-18 Months
4. LUP Application Environmental Review:	6 Months
5. LUP Approval/Issuance	3 Months
6. Construction Drawings/Building Permit Application	6 Months
7. Building Plan Check Complete	12 Months
8. Bidding/Financing:	6 Months
9. Construction/Occupancy Clearance/Lease-Up:	18-27 Months
TOTAL:	84-90 Months (7-8 Years)

Any number of delays could prolong the estimated timeline above causing further delays in producing the much-needed housing for our community. Maximizing the land available for housing needs your leadership now in order to have a fighting chance of seeing housing units available to serve our community by the end of this decade.

REZONING IS A CRITICAL FIRST STEP BUT NOT A COMPREHENSIVE POLICY SOLUTION TO ADDRESSING OUR HOUSING NEEDS

CHC is concerned the process the County has undertaken in the implementation of Program 1 in the Housing Element could have an unintended negative impact on local housing production. Specifically, at the January 9th Board hearing, the Board identified various criteria, including the provision of additional affordable units beyond local and state minimums, the provision of deed restricted moderate-income units, the provision of public park land, the inclusion of day care centers, and other criteria by which they would evaluate the proposed rezone sites. Understanding that these criteria are unenforceable for the properties they choose to rezone, the Board further requested property representatives to submit Letters of Intent to memorialize developers' "offers" with respect to the Board's rezone criteria.

State Laws explicitly require that any regulatory constraints to housing development be identified in the adopted Housing Element, and that an agency cannot establish policies or regulations that have the effect of reducing the number of housing units allowable on a site without equally offsetting those constraints within the jurisdiction. During this rezone process, the Board has essentially required that developers voluntarily, and perhaps prematurely, limit the number of housing units developable as a prerequisite to being selected for rezoning despite being included in its certified Housing Element.

CHC understands and is generally in alignment with the Board's desire for more affordable and moderate-income housing, and the provision of public open space and neighborhood amenities to be interwoven into existing communities to maintain a high-quality of life as our region continues to evolve in the future. However, CHC takes issue with the approach the Board has adopted to attempt to compel developers to provide these benefits and the implied negative connotation of multifamily housing the Board is promoting in this policy discourse. Ultimately, we believe the rezoning of sites is only a small first step and short-term solution to solving the housing crisis at hand, and we remind the Board that Program 1 is only the first of 25 total programs the County has identified in its Housing Element to better facilitate housing development and achieve our local housing needs.

THE COUNTY SHOULD FOCUS ON POLICIES TO INCENTIVIZE HOUSING AND COMMUNITY BENEFITS

It is our strong belief that we must focus our collective efforts on creating policies and regulations to incentivize housing units, not develop additional ways to restrict their development (e.g., through arbitrary rezoning criteria). Therefore, in addition to rezoning all sites considered, we strongly recommend that the Board prioritize the following Housing Element programs as part of the 2024 budget cycle and departmental work plan.

Program descriptions from the County's Housing element are attached to this letter for reference.

- Program 5: Tools and Incentives for High-Quality Affordable Housing
- Program 6: Housing for Farmworkers and Other Employees
- Program 13: Density Bonus Provisions
- Program 16: Reduction of Governmental Constraints
- Program 21: Local Preference
- Program 22: Recreational Amenities for Housing Projects

- Program 23: Workforce Housing Study
- Program 24: Rental Housing Incentive Program

Within each program description in the Housing Element, Staff suggests the types of policies and actions that will achieve the various goals. CHC is in alignment with many of these suggestions as we strongly believe focusing on creating the below policy solutions would be far more effective in achieving the Board’s goals. In this spirit, our organization is fully committed to helping research, draft, advocate for, and facilitate adoption of such policies in partnership with the County.

1. A local density bonus ordinance amendment to provide equivalent or greater incentives and density bonuses for the provision of deed restricted moderate- and middle-income housing with inclusion of a local preference policy to ensure new housing units are affordable to and available to our local workforce.
2. The reduction and/or waiver of parks fees and other incentives in exchange for the provision of public parks, open space, and community benefits within private developments
3. The creation of an adaptive reuse ordinance to minimize physical and regulatory constraints and incentivize the rehabilitation of existing non-vacant commercial sites as housing.
4. The amendment of our local ADU ordinance to allow the sale of newly constructed ADUs as established in recently adopted State legislation.

Similarly, the County must prioritize infrastructure improvements to accommodate our future housing needs as part of the Public Works budget and allocate funding accordingly in its upcoming Capital Improvement Plans.

CONCLUSION

Since our organization’s creation two decades ago, CHC has educated and advocated for workforce housing policies as being the most critical ingredient in achieving an economically, socially, and environmentally sustainable future for the South Coast of Santa Barbara County. When we began describing our region’s housing needs as a “crisis,” that was a novel concept. Today, however, the term housing crisis has become a household name and ubiquitous discussion topic across our region and state. Truthfully, that change has been validating, emboldening, and welcome as more and more people from all walks of life come to understand the important role that having available housing spanning the spectrum of affordability plays in the long-term vitality of our communities.

However, we still find that the negative connotations of housing and exclusionary housing ideals pervade in veiled pro-housing rhetoric— *“we don’t need more housing, we need more affordable housing,”* or, *“increasing supply will induce more demand, therefore don’t build anything.”* These arguments ignore the fundamental facts that the housing crisis is a statewide issue, that exclusionary local land use policies have caused severe long-term regional impacts and externalities, and the intrinsic responsibility that each and every jurisdiction has in collectively addressing this issue for our region and State’s future.

In this regard, a recent Court of Appeal decision regarding an associated State Housing Law (SB 10) was published (*Aids Healthcare Foundation v. Bonta*), in which the Court addressed many of these underlying arguments to oppose housing development and avoid compliance with the intent of the State Legislature. An excerpt from the Court’s brief is provided below:

[W]e independently find a sufficient factual and policy basis for our Legislature’s repeated findings over the years that the issue of assuring an adequate supply of affordable housing is one of statewide or regional concern, even though it might appear to be a local issue at first blush. To begin, there is a direct link between the affordability of housing and the supply of housing. Under basic economic principles, prices go up when demand exceeds supply. Thus, the rise in housing prices at every income level in California is logically linked to the insufficient supply of housing at all of those income levels. What is more, the task of ensuring a great supply of housing is one that is logically handled at the state level. That is because local governments are susceptible to “not in my backyard” (or NIMBY) pressure: Local residents do not want to live near high density housing, so they elect local officials hostile to such housing or lobby heavily against such housing, figuring that some other local government will approve higher-density projects; because local governments would not address the housing shortage if left to their own devices, state intervention is sensible—if not outright necessary.

We appreciate the County’s efforts to date and understand the Board’s goals with this process, but we would urge the Board members to take accountability for our housing needs not out of obligation, but as an opportunity to plan for the future of our local, regional, and statewide needs proactively and adequately.

Again, we recommend the County to rezone all these sites as a critical first step, and subsequently prioritize our collective efforts on the creation of facilitatory policies to incentivize the types of housing and community benefits most important to our local community. We look forward to our continued partnership and collaboration with the County, and the great opportunity ahead to plan for our community’s future.

Sincerely,



Craig Minus
Executive Director

Enclosures

1. **Appendix 1:** County of Santa Barbara 2023-2031 Housing Element Update Program Descriptions Excerpts

Appendix 1:
County of Santa Barbara
2023-2031 Housing Element Update
Program Descriptions Excerpt

Program 5: Tools and Incentives for High-Quality Affordable Housing

The County offers various incentives and tools to facilitate the development of affordable housing throughout the unincorporated county, including housing for lower- and moderate-income households (including extremely low-income households), special needs groups, and the workforce. These include:

1. Encouraging the development of unit types that are affordable by design, including ADUs/junior ADUs (JADUs), agricultural employee dwellings (AEDs), infill development, and mixed use development through County ordinances, the ADU Ordinance, AED Ordinance, and Density Bonus Ordinance.

2. Modifying setbacks, height limits, parking requirements, minimum yard area, or other applicable zoning standards for new affordable housing projects approved under a Development Plan, Development Agreement, or Density Bonus concessions.
3. Providing Board-approved discretionary reductions of development impact fees for projects with demonstrated public benefits, including the provision of on-site affordable and/or special needs housing.
4. Partnering with private and non-profit housing developers, including the Housing Authority of Santa Barbara County (HASBARCO), and providing gap financing for affordable housing projects as funding permits.

Program 5 - Actions & Implementation	
Specific Actions and Timeline	<ul style="list-style-type: none"> • Annually, issue a Notice of Funding Availability (NOFA) to solicit project information on developments that will occur over the next several years. • Annually or more frequently as warranted, review funding applications; meet with housing developers to promote affordable housing incentives and tools available, and explore opportunities for affordable housing development. • Annually or more frequently as warranted, evaluate applications as they are ready to proceed with development (development approvals received, financing identified, including state funds) and award IHO In-Lieu, HOME Investment Partnership Program (HOME), Permanent Local Housing Allocation (PLHA), and other federal and/or state funds for affordable housing projects, prioritizing funding for projects that include housing for extremely low- and low-income households and housing for special needs groups, such as people experiencing homelessness, persons with disabilities, large families, agricultural employees, female-headed households, and seniors. • By 2031, work with local for-profit and non-profit developers to pursue the creation of 3,853 affordable housing units through new construction or conversion of existing units. • By January 2026, study options for long-term funding to encourage and help finance affordable housing (e.g., vacancy tax, short-term rental tax, real estate transfer tax for higher-end homes, and bonds). • By 2031, implement and provide proactive outreach for the Workforce Homebuyer Program to provide financial assistance to lower-income first-time homebuyers and continue to explore opportunities to support homeownership opportunities on the South Coast. • To facilitate appropriate parcel sizes (e.g., one to 10 acres) and affordability on large rezone sites, the County will establish incentives and other strategies as appropriate (e.g., streamlined lot splits, fee reductions, density bonuses above those offered by SDBL, and funding) by December 2025.
Primary Responsible Departments	Community Services Department, Housing and Community Development Division
Funding Sources	County Housing Trust Funds (HTFs) (Inclusionary In-Lieu Fees); PLHA; HOME
Relevant Housing Policies	Policies 2.1, 3.1, 4.1, 5.1, 5.2, 6.1, 6.2, 6.4, and 6.5

Program 6: Housing for Farmworkers and Other Employees

The County will continue to facilitate the development of housing for its workforce, including housing for farmworkers. In addition, the County will continue to evaluate and revise, as appropriate, permit procedures to streamline the permit process for farmworker housing and housing for other employees.

Program 6 – Actions & Implementation	
Specific Actions and Timeline	<ul style="list-style-type: none"> • Annually, meet with housing developers and large employers to explore opportunities for affordable housing for the workforce, especially for farm workers. Additionally, where feasible, discuss locating jobs where housing exists. People’s Self-Help Housing (PSHH) is the County’s primary developer of farmworker housing and consults with farm operators, ranch owners, and other agricultural and major employers to explore the need for additional housing. • Annually, collaborate with employers to pursue funding available for agricultural and workforce housing, including but not limited to State HCD and U.S. Department of Agriculture (USDA) rural development program funds. • By 2031, pursue 100 affordable housing units to meet the needs of farmworkers, including the needs of extremely low-income farmworkers. • By July 2027 amend the zoning ordinances to allow all employee dwellings (not just farmworker dwellings) that accommodate up to six employees to be permitted in the same manner as a single-family dwelling (SFD) in the same zone. • By July 2027, amend the zoning ordinances to update regulations to provide a streamlined ministerial permit process for qualifying farmworker housing complexes in compliance with recent state laws amending the Health and Safety Code (AB 1783 and AB 107), and to consider additional amendments.
Primary Responsible Departments	Community Services Department, Housing and Community Development Division; P&D
Funding Sources	County HTFs (IHO In-Lieu Fees); PLHA; HOME
Relevant Housing Policies	Policies 1.1, 1.3, 2.1, 3.1, and 5.1

Program 13: Density Bonus Provisions

State Density Bonus Law (SDBL; Government Code Sections 65915-65918) is a tool that incentivizes the construction of affordable housing by allowing a developer to add additional housing units to a project beyond the locally-zoned capacity and secure other incentives and/or concessions in exchange for a commitment from the developer to include deed-restricted affordable units in the project. When a developer meets the requirements of SDBL, the County is obligated to permit increased building density, grant incentives, and waive any conflicting local development standards (e.g., height limits, parking requirements) unless certain limited exceptions apply.

The County last updated its density bonus provisions in 2019. SDBL has been amended several times since 2019, including but not limited to SB 290, AB 1763, AB 571, and AB 634, warranting additional revisions to the County’s ordinance implementing the state’s density bonus provisions.

To address the lack of housing available to moderate-income households and the lack of related funding, the County will evaluate and adopt, as appropriate, zoning ordinance amendments to develop a County density bonus program that will create an incentive for the construction of housing units for this income category.

Program 13 – Actions & Implementation	
Specific Actions and Timeline	<ul style="list-style-type: none">• By the end of 2025, amend the County’s zoning ordinances to comply with current changes to SDBL.

Program 13 – Actions & Implementation	
	<ul style="list-style-type: none"> • Annually, promote the use of density bonus provisions for affordable housing during outreach to developers. • By December 2025, evaluate the appropriateness of a County density bonus program that incentivizes moderate-income housing, and if necessary, amend the zoning ordinances in 2026. • Ongoing, continue to provide consultation for project applicants who want to use SBDL or the future County density bonus program as part of their proposed housing project.
Primary Responsible Departments	P&D
Funding Sources	County General Fund
Relevant Housing Policies	Policies 2.1, 3.1, 5.2, and 6.2

Program 16: Reduction of Governmental Constraints

In recent years, numerous changes to state housing laws have been passed to foster the development of housing for special needs populations. The County’s zoning ordinances must be updated to comply with these new requirements. In addition, the County identified a range of governmental constraints to housing development in the county that is discussed more fully in *Chapter 3, Housing Constraints Assessment* and *Appendix G, Governmental Constraints Data and Analysis*. Many of these constraints are being addressed by other programs (e.g., zoning ordinance amendments for ADUs, density bonus, and inclusionary housing, as well as the creation of minimum density requirements), and where they are not, this program commits the County to take steps through amendments to the zoning ordinances to address the other constraints. These amendments will be built into the County Planning and Development Department (P&D), Long Range Planning Division’s Work Program.

Program 16 – Actions & Implementation	
Specific Actions and Timeline	<ul style="list-style-type: none"> • Within three years of Housing Element adoption, amend the zoning ordinances as discussed in Appendix G, including expanding zones that allow certain uses-by-right. Specifically, the County will 1) bring zoning ordinances up to date with state housing laws, including but not limited to housing element sites analysis and reporting (AB 1397, AB 879, and SB 6), 2) amend zoning ordinances to allow special care homes for seven or more persons with the same permit types as other residential uses of the same type in the same zone, 3) update the definition of “special care home” for six or fewer persons to clarify that the residents are a “family” and regulated as such, and 4) create objective standards and ministerial permit paths for emergency shelters, transitional housing (AB 139), supportive housing (AB 2162), low-barrier navigation centers (LBNC; AB 101). • Within four years of Housing Element adoption, amend the zoning ordinances to ensure that the findings for approval for all housing development projects that require a discretionary permit (e.g., CUPs and DVPs) are objective and consistent with state law. In the interim, the

Program 16 – Actions & Implementation

	<p>County will continue to comply with the Housing Accountability Act and other state laws.</p> <ul style="list-style-type: none"> • Within two years of the Housing Element adoption, amend the Montecito Land Use and Development Code (MLUDC) to provide a ministerial permit process for qualified housing developments (i.e., SB 35), as adopted for the County Land Use and Development Code (LUDC) in January 2023 and as required by state law. • Within three years of the Housing Element adoption, evaluate and adopt, as appropriate, zoning ordinance amendments to allow multi-level housing facilities (e.g., independent living, assisted living, skilled nursing, life plan communities) in residential and other appropriate zones primarily near existing retail uses, personal and medical services, and public transit. • Within three years of the Housing Element adoption, amend the zoning ordinances to remove the findings for approval for reasonable accommodations related to rural and scenic character compatibility and neighborhood compatibility. • Within one year of the Housing Element adoption, expand the Objective Design/Development Standards to the MLUDC and the CZO. • Annually, review and identify necessary amendments to the zoning ordinances to ensure compliance with new state laws. The amendments will be built into the 3-5-year County work program. • Within three years of the Housing Element adoption, modernize the multifamily residential and commercial zone (e.g., allow mixed uses) districts to facilitate the development of multifamily housing and to implement new state laws (e.g., AB 2011 and SB 6), which streamline the approval process for housing in commercial zones. • Within four years of the Housing Element adoption, update the parking standards to be consistent with new state laws (e.g., AB 2097). • By February 2024, amend the zoning ordinances to clarify that the Montecito Growth Management Ordinance has been suspended to comply with SB 330. • Upon completion of the County’s AB 1600 fee study, the County will assess options to reduce or defer development impact mitigation fees for housing development projects.
Primary Responsible Departments	P&D
Funding Sources	County General Fund
Relevant Housing Policies	Policies 1.1, 2.1, 3.1, 5.2, and 6.1

Program 21: Local Preference

The County will study the feasibility of developing a Local Preference Housing program that prioritizes people who live and/or work within Santa Barbara County regions to rent or purchase affordable and upper moderate-income housing units. The County will ensure that this program balances providing affordable housing for households at risk of displacement while avoiding fair housing issues in compliance with SB 649.

Program 21 – Actions & Implementation	
Specific Actions and Timeline	<ul style="list-style-type: none"> By June 2025, study the development of an ordinance or guidelines that establish a local preference for people who live and/or work within the county regions over other persons to rent or purchase affordable and upper moderate-income (120-200 percent of the AMI) housing units that are subsidized by the County or are provided through the IHO. The priorities that should be studied include, but are not limited to 1) eligible households that reside and work within the area (i.e., South Coast or North County) of the units being offered, 2) eligible households that reside within the area the units are offered, but work in another area of the county, 3) eligible households that work within the area the units are offered but reside in another area of the county, and 4) eligible households that work within the area the units are offered but reside outside of the County. As part of this study, review options to incentivize private developers to implement a local preference program for non-subsidized housing projects.
Primary Responsible Departments	Community Services Department, Housing and Community Development Division
Funding Sources	General Fund
Relevant Housing Policies	Policies 1.2 and 3.1

Program 22: Recreational Amenities for Housing Projects

Housing development projects must pay their pro rata share of fees for recreational facilities to offset project-generated demand in public parks and recreational facilities. Fees may be offset by the provision of private or public recreational amenities on-site. However, the County recognizes the acquisition of new public parks is challenging and in some cases future residential development may be able to provide new public recreational amenities and thus could warrant an increase in the fee off-set for recreation facilities that are open to the public. Recreational facilities and in-lieu dedications should be designed to further the County’s recreational goals, policies, and/or programs set forth in the Comprehensive Plan, Countywide Recreation Master Plan (when adopted), Active Transportation Plan, Development Impact Mitigation Fee Program, and/or other County-adopted recreational-related policies and programs.

Program 22 – Actions & Implementation	
Specific Actions and Timeline	<ul style="list-style-type: none"> Annually, update the development impact fees for parks. By December 2024, the County will consider a tiered reduced fee for affordable housing projects (e.g, greater fee reduction for dedication of land for and construction of onsite public recreation facilities or a greater percentage of affordable units) and the creation of further incentives for the inclusion of on-site recreational facilities. By 2026, adopt the Countywide Recreation Master Plan that identifies needs and goals for recreational facilities across the county and identifies incentives to encourage the inclusion of public recreational opportunities within future housing developments.
Primary Responsible Departments	County Executive Office (AB 1600 Fees), Community Services Department, Parks Division, and P&D
Funding Sources	General Fund
Relevant Housing Policies	Policies 1.4 and 1.6

Program 23: Workforce Housing Study

The County will complete a workforce housing study that identifies the needs for this housing category in the community, including housing for County employees, and evaluates potential sites, including County-owned land, where workforce housing could be constructed. Workforce housing is defined in the County’s IHO as affordable to those “persons or families whose income is between one hundred twenty (120) percent and two hundred (200) percent of AMI, adjusted for family size. This category is acknowledged in Santa Barbara County as households who need affordable housing due to high area home sales prices.”

Program 23 – Actions & Implementation	
Specific Actions and Timeline	<ul style="list-style-type: none"> By December 2024, complete the workforce housing study.
Primary Responsible Departments	Community Services Department, Housing and Community Development Division, General Service Department, Real Property Division

Program 23 – Actions & Implementation	
Funding Sources	General Fund
Relevant Housing Policies	Policies 1.1 and 1.2

Program 24: Rental Housing Incentive Program

The County will explore options to incentivize rental housing development, which is particularly important for lower- and moderate-income households that often struggle to afford purchasing homes. A lack of rental housing drives up rental costs and limits options for lower- and moderate-income households.

Program 24– Actions & Implementation	
Specific Actions and Timeline	<ul style="list-style-type: none"> • Within three years of Housing Element adoption, explore and create a program to incentivize the development of rental housing. The program should consider zoning ordinance amendments that would provide an increase in density for smaller-sized units.
Primary Responsible Departments	P&D
Funding Sources	General Fund
Relevant Housing Policies	Policies 1.1 and 1.2