

Katherine Douglas

Public Comment

From: Lucille Boss
Sent: Tuesday, May 13, 2025 10:47 AM
To: sbcob
Subject: FW: Pro-Housing Designation - CHC Public Comments
Attachments: CHC Public Comment Letter re Prohousing Designation 20250512 FINAL.pdf

FYI, for the May 20 item.

From: Craig Minus <Craig@CoastalHousing.org>
Sent: Monday, May 12, 2025 5:34 PM
To: Lucille Boss <lboss@countyofsb.org>
Cc: Jon Standring <jon@beachsidepartners.com>
Subject: Pro-Housing Designation - CHC Public Comments

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Hi Lucille,

Thanks for circulating the draft application.
Our group has provided some comments for you to consider in the attached letter.
Please review and I'm happy to discuss if needed.
Thanks,
Craig

Craig Minus

Executive Director

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May 12, 2025

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Community Services Department

Via email to HCD@countyofsb.org

Subject: Prohousing Designation Program Application

To whom it may concern:

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The Coastal Housing Coalition (CHC) is a non-profit organization and the voice of local employers and employees in support of workforce housing. The CHC advocates for housing available to households earning 120-200% of the community Area Median Income (AMI). We believe that the lack of available, affordable housing near jobs is adversely affecting our region's economy, environment, and civic life, all of which will worsen if we do not address this crucial problem.

We continue to applaud the County's efforts to further much-needed housing development consistent with the County's 2023-2031 Housing Element. Obtaining a Prohousing Designation would put the County higher on various lists to receive grant funding; funding without which affordable housing is a more daunting task.

We have performed a high-level review of the County's Prop Housing Designation Application ("Application") and are encouraged by the long list of items the County is already doing to qualify for the Department of Housing and Community Development's (HCD) Prohousing Designation Program ("Program"). CHC, however, offers the following comments and recommendations to help the County improve its application and promote the development of housing.

I. The County Should Clarify and Supplement its Application to Qualify for the Prohousing Designation

The Application and associated Resolution require the County to verify they have met certain threshold criteria to qualify for the Program. CHC notes that a few statements warrant clarification.

A. Plans to Foster Stakeholder Engagement

The Application criteria emphasizes that the County should "engage in a diligent public participation process" including "specific efforts to engage all segments of the community, including individuals or representatives of lower-income and special

needs households, for-profit and non-profit developers and special needs service providers.”¹ CHC has sought active engagement in various programs of the Housing Element including Programs 5 (Tools and Incentives for High-Quality Affordable Housing), Program 13 (Density Bonus Provisions), and Program 16 (Reduction of Governmental Constraints), yet we are not aware of meaningful stakeholder engagement with our constituents. **The County should supplement its application to clarify its commitments and timelines for stakeholder engagement.**

B. Go Above and Beyond the Requirements of State Law

The Prohousing Designation is meant to recognize jurisdictions that go “above and beyond” state law mandates.² Consistent with state law requirements, the Housing Element commits the County to amending “development standards to ensure maximum residential density.”³

Most, if not all, of the standards that the County plans to evaluate are focused within the purview of Planning & Development (P&D)⁴ In practice, however, the procedures, standards, and regulations of other Departments—such as Public Works—can also be barriers to housing. As an example, outdated Public Works standards that do not fully account for common multi-family development project designs trigger an uncertain Design Exception process that delays project implementation. **The County should look beyond improvements to P&D development standards and look holistically at all Departments’ standards that may needlessly delay or increase the costs of housing development.**

CHC recommends that the Application expand commitments to improve application processing and outcomes by enacting policies that ensure better coordination among County Departments regulating development.

C. Progress Toward Regional Housing Needs

The Program emphasizes the importance of local agencies rezoning sufficient sites to accommodate their regional housing needs assessment (RHNA). CHC observes that the County is now 25% of the way through the Housing Element planning period and **is well behind pace** to achieve its RHNA goals. The below table illustrates progress toward the goal in County thus far.

2023-2024	Very Low	Low	Moderate	Above Moderate	Total
North County	0 of 564 0%	153 of 243 63%	19 of 229 8%	95 of 486 19.5%	267 of 1,522 17.5%
South County	3 of 809 0.3%	54 of 957 5.6%	3 of 1,051 0.03%	315 of 1,321 23.8%	375 of 4,142 9%
County Total	3 of 1,373 0.2%	207 of 1,200 17.3%	22 of 1,280 1.7%	410 of 1,807 22.7%	642 of 5,664 11.3%
<i>Source: Santa Barbara County General Plan Annual Progress Report dated February 2025</i>					

¹ Application, p. 7.

² See Application, p. 81.

³ Application, p. 18.

⁴ Application, p. 18 (Category 1l)



Given these results and the County's commitment in Program 1 of the Housing Element, **CHC urges the County to commit to annual audits and take immediate actions to ensure it gets back on target to produce its RHNA.**

The Application's proposal to audit RHNA progress "by December 2027" is not sufficient. If the County's rezone assumptions for (1) the number of units on a site or (2) the affordability categories are too high,⁵ rezoning additional sites in 2028 will not be enough to address the deficit.

D. Compliance with Applicable State Housing Law

The required Resolution for the Application also states the County "acknowledges and confirms that it is currently in compliance with applicable state housing law."⁶ However, CHC remains concerned that recent County decisions do not fully align with state housing law. For example:

- CHC believes that the County's SB 9 Ordinance amendments conflict with state law and require review from HCD before the County can verify compliance. These changes are particularly important because the application relies on SB 9 compliance to support qualifying for the Prohousing Designation.⁷
- The County has missed statutory deadlines. For example, the application proposes to implement "pre-approved plans for accessory dwelling units by December 31, 2025" even though state law required the County to implement this project on January 1, 2025.⁸
- HCD's Housing Accountability Unit has issued the County six letters on housing laws since January 2024.⁹ The Application should clarify if the County is in full compliance with HCD's guidance and commit to adhering to HCD's interpretation of state law.

II. Recommendations

CHC applauds the County for seeking a Prohousing Designation and hopes the County will implement our recommendations to improve its Application. Specifically, CHC recommends that the County:

1. Provide clear information on Housing Element Program implementation, including meaningful stakeholder outreach and engagement.
2. Partner with stakeholders to support housing development by reducing barriers, creating streamlined processes, and reducing costs and risks associated with new development.
3. Go above and beyond in creating policies and programs that encourage workforce housing.

⁵ For instance, on the South County sites, the County assumed 50% of all potential units on a site would be developed as affordable to lower income households. In reality, the highest percentage of lower income housing is closer to 20% (or less) under state law and without local incentives, leaving a realistic over-estimation of at least 30%.

⁶ Application, p. 16.

⁷ See Application, pp. 8, 77.

⁸ Compare Application, p. 18 (Category 3B) to Gov. Code, § 65852.27(a).

⁹ See HCD, Accountability and Enforcement <https://www.hcd.ca.gov/planning-and-community-development/accountability-and-enforcement> (accessed on May 8, 2025).

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4. Analyze and update permit procedures and standards on a cross-Department basis to ensure Departments' standards are designed to facilitate the types and densities of housing contemplated in the Housing Element.
5. Revise deficient processes and standards quickly to avoid delaying housing projects.
6. Regularly audit Housing Element implementation to manage proactively implementation to achieve the RHNA.
7. Interpret and implement state law and HCD guidance in favor of housing as a standard practice.
8. Educate the public on benefits of housing for our environment, workforce, families and community.
9. Protect and support existing housing stock.

CHC is confident that implementation of the above suggestions will result in a more comprehensive Application. We also hope the County will put these policies into action at all levels and across County departments.

We look forward to seeing the great work that can be with the funding that comes with the Prohousing Designation.

Sincerely,



Craig Minus
Executive Director