

**ATTACHMENT F: County Planning Commission Memorandum, dated March 4, 2025**



## COUNTY OF SANTA BARBARA PLANNING AND DEVELOPMENT

### MEMORANDUM

**TO:** County Planning Commission

**FROM:** Lisa Plowman, Director, Planning and Development Department  
Alex Tuttle, Deputy Director, Long Range Planning Division

**STAFF CONTACT:** Eva Marrero, Planner, (805) 568-2044  
Allen Bell, Supervising Planner, (805) 568-2056

**DATE:** March 4, 2025

**HEARING DATE:** March 12, 2025

**RE:** Emergency Shelters Zoning Ordinance Amendments  
Case Nos. 24ORD-00021 and -00022

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#### ***Issue Summary and Recommendations***

On January 29, 2025, Planning and Development (P&D) staff presented the Emergency Shelters Zoning Ordinance Amendments to the County Planning Commission. In part, staff proposed amendments to the Land Use and Development Code (LUDC) and Article II, the Coastal Zoning Ordinance (CZO), that would allow emergency shelters with a ministerial permit in certain zones. As required by State law, the amendments would help ensure that the County has sufficient capacity (i.e., facilities and beds) to accommodate its need for emergency shelters throughout the 2023-2031 housing element cycle. The County Planning Commission staff report for that hearing contains details on the amendments.

Based on feedback from the County Planning Commission and others, staff re-examined existing and new State laws concerning emergency shelters. Cities and counties may forgo allowing emergency shelters with a ministerial permit in zones that allow residential uses if existing emergency shelters within their jurisdiction have capacity to sufficient accommodate their need to house homeless persons.

P&D and County Community Services Department (CSD) staff recently compiled an inventory of existing emergency shelters located in the unincorporated county and on County-owned sites, including those sites which are located in incorporated cities. Staff identified seven existing emergency shelters. These emergency shelters accommodate the County's current need to house homeless persons based on the most recent (2024) point-in-time (P-I-T) count. However, based on existing contracts, three of these emergency shelters are slated to close before the end of the 2023-2031 housing element cycle. As a result, while sufficient capacity currently exists, the County may lack adequate emergency shelter capacity beginning in late December 2028, if new shelters are not provided or existing contracts are not extended. Therefore, staff recommends that the County review its emergency shelter capacity by mid-2028 and, if necessary, take action to eliminate any shortfall that may occur from late December 2028, through mid-February 2031. Staff no longer recommends amending the LUDC or CZO to allow emergency shelters with a ministerial permit at this time, since sufficient capacity already exists.

However, new State laws still require that the County amend its zoning ordinances to update the definitions of “emergency shelter” and “low barrier navigation center” and add objective standards for new emergency shelters.

The County Planning Commission’s motion should include the following:

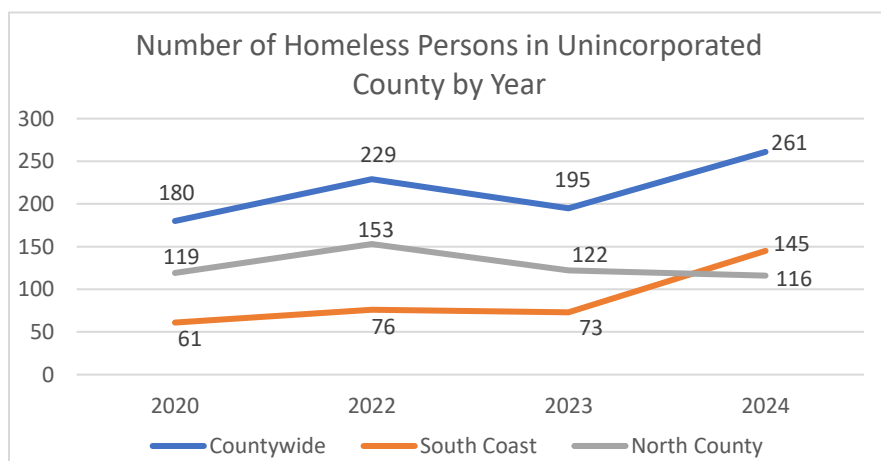
1. Make the required findings for approval (Attachment A), including the California Environmental Quality Act (CEQA) findings, and recommend that the Board of Supervisors (Board) make the required findings for approval, including the CEQA findings, of the proposed ordinance amendments;
2. Recommend that the Board determine that the ordinance amendments (Case Nos. 24ORD-00021 and 24ORD-00022) are exempt from the provisions of CEQA pursuant to Sections 15061(b)(3) and 15265 of the State Guidelines for Implementation of CEQA (Attachment B);
3. Adopt a resolution (Attachment C) recommending that the Board adopt an ordinance amending Section 35-1 (Case No. 24ORD-00021) of Chapter 35, Zoning, of the Santa Barbara County Code; and
4. Adopt a resolution (Attachment D) recommending that the Board adopt an ordinance amending Article II, the Coastal Zoning Ordinance (Case No. 24ORD-00022) of Chapter 35, Zoning, of the Santa Barbara County Code.

### **Background**

As explained in the County Planning Commission staff report for January 29, 2025, new State law requires that jurisdictions demonstrate they have sufficient emergency shelter capacity to meet their most recent homeless point-in-time (P-I-T) count throughout the 2023-2031 housing element cycle.

The 2024 P-I-T count shows that the homeless population in the unincorporated county totals 261 persons. Table 1, below, displays the number of homeless persons in the unincorporated county over time and by subregion (i.e., North County and South Coast).

**Table 1 – Santa Barbara County Point-in-Time Count (2020 - 2024)**



GC Section 65583(a)(4)(A) states that the County may accommodate its most recent P-I-T count by allowing emergency shelters with a ministerial permit in zoning designations that allow residential

uses. State law also includes two alternative means to meet the most recent P-I-T count without allowing emergency shelters with a ministerial permit:

- “The existence of one or more emergency shelters within its jurisdiction ... that can accommodate that jurisdiction’s need” (Government Code (GC) Section 65583(a)(4)(F)), and
- “On sites owned by the local government if it demonstrates with substantial evidence that the sites will be made available for emergency shelter during the planning period, are suitable for residential use, and are located near amenities and services” (GC Section 65583(a)(4)(J)).

### ***Existing Emergency Shelter Capacity***

At the hearing on January 29, 2025, staff recommended that the County comply with State law by allowing emergency shelters with a ministerial permit in thirteen zones in the Inland Area and five zones in the Coastal Zone, pursuant to GC Section 65583(a)(4)(A). Staff now recommends that the County fulfill the State requirements for emergency shelters through existing emergency shelters, rather than amending the LUDC and CZO to allow emergency shelters with a ministerial permit, pursuant to GC Section 65583(a)(4)(F).

As shown in Tables 2 and 3, below, P&D and CSD staff compiled an inventory of the following:

- Existing emergency shelters on sites owned by the County within incorporated cities and unincorporated areas, and
- Existing emergency shelters owned/managed by non-governmental organizations (e.g., Good Samaritan and Dignity Moves) within unincorporated areas.

**Table 2**  
**Existing Emergency Shelters on Sites Owned by the County**  
**within Incorporated Cities and Unincorporated Areas**

<b>Operator/Manager</b>	<b>Project Name</b>	<b>City/ Unincorporated Area</b>	<b>Contract Termination Date</b>	<b>Beds</b>
Good Samaritan Shelter	Dignity Moves Santa Barbara	City of Santa Barbara	06/30/2025	34
Good Samaritan Shelter	Hope Village	City of Santa Maria	12/31/2028	97
Good Samaritan Shelter	Hedges House of Hope	Isla Vista (unincorporated)	-	45
Good Samaritan Shelter	BH Pallet Shelter (at Bridgehouse)	Lompoc Area (unincorporated)	-	20
Good Samaritan Shelter	Bridgehouse	Lompoc Area (unincorporated)	-	70
Good Samaritan Shelter	La Posada	Goleta Valley (unincorporated)	03/31/2029	80
Total				346

**Table 3**  
**Existing Emergency Shelters Owned/Managed by Non-governmental Organizations**  
**within Unincorporated Areas**

Owner/Manager	Project Name	Unincorporated Area	Contract Termination Date	Beds
Domestic Violence Solutions for Santa Barbara County	Santa Barbara Emergency Shelter	Goleta Valley (unincorporated)	-	25

The seven existing emergency shelters listed in the tables above operate year-round and have a total capacity of 371 beds, which exceeds the County’s 2024 P-I-T count by 110 beds. However, Dignity Moves is scheduled to close by June 30, 2025. Excluding Dignity Moves, the six remaining emergency shelters have a capacity of 337 beds, which exceeds the County’s 2024 P-I-T count by 76 beds.

Hope Village and La Posada are scheduled to close by December 31, 2028, and March 31, 2029, respectively. By December 31, 2028, the remaining five emergency shelters would have a capacity of 240 beds, at which point the County will would have a shortfall of 21 beds. By March 31, 2029, the remaining four emergency shelters would have a capacity of 160 beds, at which point the County would have a shortfall of 101 beds.

To comply with State law and its need for emergency shelters, staff recommends that the Board, through P&D, review its emergency shelter capacity by June 30, 2028, and take one or more actions if it lacks sufficient capacity to fully accommodate its 2024 or later P-I-T count from December 31, 2028, through February 15, 2031. These actions may include, among others, the following:

1. Identify one or more County-owned sites for an emergency shelter(s); to comply with GC Section 85583(a)(4)(J), the County will ensure any site(s) “... will be made available for emergency shelter during the planning period, they are suitable for residential use, and the sites are located near amenities and services that serve people experiencing homelessness ...”;
2. Extend existing contract(s) for emergency shelters located on County-owned sites; and/or
3. Amend the LUDC and/or CZO to allow emergency shelters in a select zone(s) with a ministerial permit; to comply with GC Section 65583(a)(4)(A), the County will ensure that the selected zone(s) “allow residential uses and ... are suitable for residential uses.”

### ***Current Permit Requirements***

The County currently relies on existing emergency shelters to accommodate its need to house homeless persons. Consistent with GC Sections 65583(a)(4)(A) and 65583(a)(4)(F), the County’s zoning ordinances allow new emergency shelters in several zones. In the Inland Area outside Montecito, the LUDC allows emergency shelters with a Minor Conditional Use Permit (MCUP) in the Retail Commercial (C-2) and Community Mixed Use – Los Alamos (CM-LA) zones, and with a Land Use Permit (LUP) in the General Commercial (C-3), Service Commercial (CS), Industrial Research Park (M-RP), and Light Industry (M-1) zones. In the Coastal Zone, the CZO allows emergency shelters with a Coastal Development Permit (CDP) in the High-Density Student Residential (SR-H) and the M-RP zones, and with a MCUP in the C-2 zone.

### ***Definitions and Objective Standards***

The County Planning Commission staff report for January 29, 2025, explains that the County must update the definitions of “emergency shelter” and “low barrier navigation center” to match new definitions in GC Sections 65583(a)(4)(C) and 65660(a), respectively. The County may also apply up to eight objective development standards to new emergency shelters in GC Section 65583(a)(4)(B). Therefore, the proposed LUDC and CZO amendments include the following:

- Amend the definitions of “emergency shelter” and “low barrier navigation center” to comply with current State law, and
- Add four objective development standards that would apply to new emergency shelters in addition to other existing development standards that apply to residential development within the same zone.

For more details on the two amendments above, please see Section 5.1.2, *Zones and Allowable Land Uses, Standards for Specific Land Uses, and Definitions*, in the County Planning Commission staff report for January 29, 2025.

### ***Environmental Review***

The proposed LUDC and CZO amendments are exempt from environmental review pursuant to State CEQA Guidelines Sections 15061(b)(3) and 15265. State CEQA Guidelines Section 15061(b)(3) provides an exemption for projects that will have no possibility of significant effect on the environment. State CEQA Guidelines Section 15265 statutorily exempts local agency activities involving the preparation and adoption of Local Coastal Program amendments from environmental review. Please see Attachment B for more details.

### ***Attachments***

- A. Findings for Approval
- B. Notice of Exemption
- C. LUDC Resolution – Emergency Shelters
- D. CZO Resolution – Emergency Shelters

cc: Case File (Eva Marrero)  
Hearing Support (David Villalobos)