

SANTA BARBARA COUNTY PLANNING COMMISSION

Staff Report for the 2015-2023 Housing Element Update

Hearing Date: December 3, 2014

Staff Report Date: November 13, 2014

Case No: 14GPA-00000-00008

**Environmental Document: Negative Declaration,
Case No. 14NGD-00000-00014**

Deputy Director: Matt Schneider

Division: Long Range Planning

Supervising Planner: Allen Bell

Project Planner: Oksana Buck

Staff Contact: 805-568-3577

1.0 REQUEST

Hearing on the request of the Planning and Development Department (P&D) that the County Planning Commission:

1. Recommend that the Board of Supervisors adopt the 2015-2023 Housing Element Update of the County's Comprehensive Plan.
2. Recommend that the Board of Supervisors adopt the Proposed Final Negative Declaration pursuant to the State Guidelines for Implementation of the California Environmental Quality Act (CEQA).

2.0 RECOMMENDATIONS AND PROCEDURES

That the County Planning Commission:

1. Recommend that the Board of Supervisors make the required findings for the project specified in Attachment A of this staff report, including the CEQA findings;
2. Recommend that the Board of Supervisors adopt the Proposed Final Negative Declaration (Case No. 14NGD-00000-00014) included as Attachment B of this staff report; and
3. Adopt a Resolution, included as Attachment C of this staff report, recommending that the Board of Supervisors adopt a Resolution approving the 2015-2023 Housing Element Update (Case No. 14GPA-00000-00008), included as Exhibit 1 to Attachment C.

3.0 JURISDICTION

County Code section 2-25.2(b)(2) states the County Planning Commission shall have jurisdiction over "[i]nitiation, consideration and recommendations regarding general plan amendments...unless the property affected by such initiation, consideration or recommendation is solely located within the Montecito planning area..." The 2015-2023 Housing Element Update will apply to the entire unincorporated county and, therefore, is not solely located within the Montecito planning area. As a result, the County Planning Commission has jurisdiction to make recommendations to the Board of Supervisors on the 2015-2023 Housing Element Update.

4.0 BACKGROUND AND ISSUE SUMMARY

Regulatory Setting

State law mandates that the County Comprehensive Plan include a Housing Element. The Housing Element contains housing data, goals, policies, and programs to help meet the current and projected housing needs of all economic segments of unincorporated Santa Barbara County. It also contains an assessment of housing needs, a land inventory identifying sites available for new housing, and an evaluation of market, governmental, and environmental factors which constrain housing production. State law also requires the Housing Element to demonstrate that the County can accommodate its share of regional housing needs. Specific attention must be given to the housing needs of farm workers, special needs groups, and households in all income categories.

Of the seven State-mandated elements of the Comprehensive Plan, the Housing Element is the only one that has a mandatory timeframe for update. This underscores local government's role in facilitating the legislature's state-wide goal of providing adequate housing opportunities for households at all income categories and needs.

Project Summary

The purpose of this project is to update the 2009-2014 Housing Element of the County's Comprehensive Plan. The update focuses on amending existing goals, policies, and programs for the eight-year 2015-2023 Housing Element Update planning period.

The existing 2009-2014 Housing Element includes goals, policies, and programs for the development of affordable housing (Attachment D). The proposed 2015-2023 update builds on what has been effective in the past by updating and amending the goals, policies and programs in the 2009-2014 Housing Element. In large part, the update (1) deletes completed goals, policies, and programs, and, as necessary, (2) amends outdated and/or adds new goals, policies, and programs. (See Attachment E, Summary Table of 2015-2023 Housing Element Goals, Policies and Programs.) The 2015-2023 Housing Element Update does not propose any rezones and continues the program of relying on the community plan process for consideration of any rezones during this housing planning period. This approach reflects the County's relatively low Regional Housing Needs Allocation (RHNA) and the adequate supply of land inventory for all income categories for the 2015-2023 Housing Element planning period.

Regional Housing Needs Allocation (RHNA) – Determination and Allocation

The California Department of Housing and Community Development (HCD) determines the housing needs for the entire county based on regional and state-wide population projections before each housing element update cycle. The housing needs are separated into four income categories (i.e., very low, low, moderate, above moderate). The Santa Barbara County Association of Governments (SBCAG) then allocates a share of the housing needs to each city (incorporated areas) and the County (unincorporated areas) as part of a Regional Housing Needs Allocation (RHNA) Plan that is submitted to HCD for approval.

On August 22, 2013, HCD approved SBCAG’s *Regional Housing Needs Allocation (RHNA) Plan 2014-2022* (SBCAG, July 2013). This plan addresses Santa Barbara County’s fifth housing element update cycle, which covers an eight-year planning period (February 15, 2015 to February 15, 2023).

The county-wide RHNA is 11,030 housing units for the 2015-2023 Housing Element planning period. Of the 11,030 units, 661 units were allocated to unincorporated Santa Barbara County (Table 1).

Table 1
2014-2022 RHNA Allocation and Land Inventory
Unincorporated Santa Barbara County

Income Category	2014-2022 RHNA (units)	Land Inventory (units)
Very Low/Low	265	853
Moderate	112	546
Above Moderate	284	3,719
Total	661	5,118

As part of the update, the County must identify adequate sites to address its very low, low, moderate, and above moderate income housing needs based on the 2014-2022 RHNA. The inventory of 5,118 units exceeds the overall RHNA of 661 units. It also exceeds the specific RHNA for each income category. As a result, the County has adequate sites to accommodate its 2014-2022 RHNA and, therefore, does not need to rezone any sites concurrent with adoption of the 2015-2023 Housing Element. While the land inventory of sites zoned for residential use, including affordable housing, exceeds the County’s 2014-2022 RHNA, staff does not recommend down-zoning (reducing densities) or otherwise reducing the number of affordable housing sites in the land inventory. Current and future housing needs and projected population growth show the demand for affordable housing will remain high in the coming decades, particularly in the South Coast.

Housing Element Update Review Process

The Board of Supervisors directed staff to begin the update of the existing Housing Element as part of P&D’s 2013-2014 work program. Staff began the update process by reviewing the 2009-2014 Housing Element, conducting demographic and labor market research, and updating the residential land inventory. P&D also initiated a county-wide public participation process to identify issues and develop solutions. Between the months of April, 2014 and July, 2014 P&D conducted county-wide outreach that included three stakeholder meetings, two public workshops, two Planning Commission workshops and one Board of Supervisors workshop. In addition, a housing survey was available at the workshops and stakeholder meetings, as well as online until November, 2014. Affordable housing providers, developers, business representatives, special needs service providers, and neighborhood advocacy groups were invited via email to participate in the stakeholder meetings. All stakeholders and individuals requested to be on the County’s interested parties list were invited via email to attend public workshops. In addition, newspaper notices were published for the Planning Commissions and Board of Supervisors workshops. Comments received through the public participation process are included in Appendix E to the Housing Element (Exhibit 1 to Attachment C). Following the workshops, on August 1, 2014, P&D completed and submitted the draft Housing Element Update to HCD for a 60-day review for their comments and findings. Comments were received from HCD by letter dated October 3, 2014 (Attachment F). As a result of these comments, staff prepared a revised Housing Element Update and Negative Declaration for decision-maker review and adoption.

Government Code section 65588(e)(2)(A) requires the County to adopt and submit the Housing Element Update to HCD by February 15, 2015. If the County does not adopt the Housing Element Update within 120 days of that deadline, Government Code section 65588(e)(4) imposes a significant penalty by postponing the County's ability to use an eight year housing element update cycle and requiring that the County "...revise its housing element not less than every four years until [it]...has adopted at least two consecutive revisions by statutory deadlines."

Next Steps/Implementation

The County Planning Commission is scheduled to hear and make recommendations to the Board of Supervisors at its December 3, 2014 hearing. The Board of Supervisors is scheduled to hear and take action on the 2015-2023 Housing Element Update at its February 3, 2015 hearing.

Upon Board adoption of the 2015-2023 Housing Element Update, staff will submit it to HCD. HCD is required to review the adopted housing element update and report its findings to the planning agency within 90 days.

A number of programs require focused consideration by the County. Attachment G includes a list of programs and proposed timelines for consideration and implementation. These will be considered for funding through P&D's annual work program process during the 2015-2023 Housing Element planning period.

5.0 REQUEST/PROJECT DESCRIPTION

The purpose of this project is to update and amend the County's 2009-2014 Housing Element to address existing and projected housing needs in the unincorporated areas of the county throughout the eight-year 2015-2023 Housing Element Update planning period. The project focuses on amendments to the 2009-2014 Housing Element. As a result, the project largely (1) deletes completed goals, policies, and programs; (2) amends outdated goals, policies, and programs; and, as necessary, (3) adds new goals, policies, and programs.

The 2015-2023 Housing Element Update contains six chapters. The title and a brief description of each chapter follow below. In summary, Chapters 1, 2, 3, 4, and 6 provide information and/or analysis of state housing element law; housing needs; governmental and non-governmental constraints to the maintenance, improvement, and development of housing; and land suitable for residential development. Together, these chapters serve as a framework for Chapter 5, which contains goals, policies, and specific programs to offset governmental and non-governmental constraints and enhance housing production consistent with the County Comprehensive Plan and state housing element law.

Chapter 1 – Introduction. Provides a general introduction to the Housing Element.

Chapter 2 – Housing Needs. Contains a housing needs assessment based on the results of public outreach and review of current population, demographic, and employment trends that contribute to housing demand throughout the unincorporated county.

Chapter 3 – Constraints and Mitigating Opportunities. Analyzes market factors, environmental and physical factors, and local and state regulations that serve as barriers to affordable and adequate housing.

Chapter 4 – Evaluation of the County of Santa Barbara’s 2009-2014 Housing Element. Evaluates the success of the housing goals, policies, and programs included in the County’s 2009-2014 Housing Element.

Chapter 5 – Housing Goals, Policies, and Programs. Contains goals, policies, and programs to address the housing needs of the unincorporated areas of Santa Barbara County. Chapter 5 is the heart of the element, and consists of six goals, 14 policies, and 36 programs. The update builds upon the 2009-2014 Housing Element by retaining existing goals, policies, and programs with minor wording clarifications; combining programs to reduce redundancy; amending programs to reflect changes; and adding new policies and programs to promote affordable housing. The full text of Chapter 5 is in the attached 2015-2023 Housing Element Update (Exhibit 1 to Attachment C). Attachment E also identifies which goals, policies, and programs are new and those that have been revised or continued without change from the 2009-2014 Housing Element.

Chapter 6 – Land Inventory and Quantified Objective. This chapter includes the land inventory and analysis, and the quantified objective. The land inventory identifies vacant and underutilized sites that are zoned and suitable for new residential development. The quantified objective is a forecast of the number of new housing units anticipated to be produced over the 2015-2023 Housing Element Update planning period.

6.0 ANALYSIS

6.1 Environmental Review

A Draft Negative Declaration (Case No. 14NGD-00000-00014) was prepared to analyze the potential impacts of the 2015-2023 Housing Element Update. The document was circulated for public comment from October 14, 2014 through November 12, 2014. P&D received one comment letter during the public comment period (Attachment H). In summary, the comment letter proposed revisions to several programs in the 2015-2023 Housing Element Update. The letter did not address the adequacy of the Draft Negative Declaration. Therefore, staff does not recommend any revisions to the Draft Negative Declaration. Staff is currently reviewing the comment letter and will report any possible revisions to the programs at the December 3, 2014 County Planning Commission hearing.

The Proposed Final Negative Declaration concludes that adoption of the 2015-2023 Housing Element will not result in any significant impacts. The Housing Element’s goals, policies, and programs provide general housing and land-use strategies that would not result in any physical development or direct environmental impacts. The proposed Housing Element is a program-level document that does not grant any entitlements or include site-specific proposals. The Housing Element also does not amend existing land-use designations, change existing zoning districts, or otherwise change existing policies. Rather, any such changes would occur through possible future actions which County decision-makers would first need to approve, adopt, fund, and/or review on a case-by-case basis subject to applicable laws and regulations and environmental review (CEQA). In part, any such changes would have to be found consistent with the County Comprehensive Plan. The Comprehensive Plan policies and zoning ordinance development standards would typically ensure that proposed projects would have less than significant effects to the environment. Mitigation measures could also be applied through the environmental review process in those instances where existing policies and development standards may be insufficient to reduce potentially significant effects to less than significant levels.

6.2 Policy and Ordinance Consistency

The County compared the goals, policies, and programs in the 2015-2023 Housing Element Update to those in other elements of the County Comprehensive Plan, and concluded that all of the elements are internally consistent. The majority of the goals, policies and programs are from the current Housing Element. The changes and additions proposed in the 2015-2023 update from the existing housing element include:

- Policy 1.2, which is a policy to encourage large employers to fund, develop, and maintain affordable housing for their workforce;
- Program 1.14, which calls for developing a County density bonus program to supplement the state's program;
- Program 1.15, which calls for developing a mixed use zone district;
- Program 1.16, which calls for developing modifications to the Design Residential (DR) zone district;
- Program 1.17, which calls for developing a Countywide minimum density residential zone district;
- Program 1.18, which requires coordination with water and sewer districts to ensure priority for service is given to affordable housing;
- Program 2.6, which calls for developing ordinance amendments to allow support uses for senior housing developments within residential zone districts; and,
- Program 2.7, which calls for clarification of the definition of "family" in the County's zoning ordinances to include persons living in a dwelling for "group use".

Policy 1.2 and Program 1.18 support policies and programs in the County's Comprehensive Plan which are supportive of affordable housing. The new programs would result in changes to ordinances and policies which will be evaluated as each program is considered by County decision-makers.

Consistency between all of the elements of the Comprehensive Plan is maintained over time by the County's required findings for approval of amendments to the Comprehensive Plan (County Land Use and Development Code section 35.104.060.A.2, Montecito Land Use and Development Code section 35.494.060.A.2, and County Coastal Zoning Ordinance section 35-180.6.b.). These require that the County make a finding that the amendment is consistent with the Comprehensive Plan, state planning and zoning laws, and applicable County zoning ordinances.

6.3 Incorporation of Montecito and County Planning Commission Comments from Workshops

On May 21, 2014, the Montecito Planning Commission voted 5-0 to receive and file the staff report and forward the following recommendation to the County Planning Commission:

- *Consider adding a policy or other provision to encourage employee housing for institutions, schools, and other large employers.*

This recommendation is included in Policy 1.2.

On May 28, 2014, the County Planning Commission voted 5-0 to receive and file the staff report and forward the following recommendations to the Board of Supervisors:

- *Expand Proposal #9 to include multi-level care senior housing facilities (e.g., independent living, assisted living, skilled nursing) that are not clearly allowed under existing residential zones.*

This recommendation is included in Program 2.6.

- *Consider adding a policy or other provision to encourage employee housing for institutions, schools, and other large employers.*

This recommendation is included in Policy 1.2.

- *Ensure that any reductions in open space, parking, or other standards only apply to projects that provide affordable, senior, or special needs housing.*

This recommendation is included in Program 1.16.

- *Apply mechanisms that ensure any changes to open space standards balance existing and proposed uses and otherwise complement the neighborhood context.*

This recommendation is included in Program 1.16.

- *Consider reducing the Development Impact Mitigation Fees (DIMF) for residential second units.*

This recommendation is included in Program 1.4.

6.4 Montecito Planning Commission Recommendation

On November 19, 2014, the Montecito Planning Commission voted 5-0 to adopt a resolution (Attachment I) recommending that the County Planning Commission recommend that the Board of Supervisors (1) adopt the 2015-2023 Housing Element Update and (2) adopt the Negative Declaration, Case No. 14NGD-00000-00014, pursuant to the State Guidelines for Implementation of the California Environmental Quality Act (CEQA). The Montecito Planning Commission did not recommend any changes to the 2015-2023 Housing Element Update or Negative Declaration.

6.5 State HCD Comments

Staff provided the Draft 2015-2023 Housing Element Update to HCD on August 1, 2014 (received by HCD on August 4, 2014). HCD provided comments on the Draft 2015-2023 Housing Element Update by letter dated October 3, 2014 (Attachment F). The letter identifies changes necessary to bring the County's housing element into compliance with state law. The County has two options to address the comments from HCD: (1) Change the draft element update to substantially comply with the requirements of state housing element law; or, (2) Adopt the draft amendment without changes. If the amendment is adopted without changes, the legislative body is required to include in its resolution of adoption written findings which explain the reasons the legislative body believes that the element substantially complies with the requirements of state housing element law despite the findings of HCD.

Staff carefully reviewed and considered HCD's comments, including receiving clarification and further direction from the staff of HCD. Changes have been incorporated into the 2015-2023 Housing Element Update to address all HCD's comments. In summary, the changes resulted in:

- Clarification of the inventory of sites for housing, including for emergency shelters and sites available for affordable housing in Isla Vista.
- Additional data and clarification of existing zoning ordinance provisions.
- Additional programs, including programs 2.7 and 2.8.

Staff is preparing a detailed response to HCD to explain the changes made in response to its comments for submittal with the adopted 2015-2023 Housing Element Update.

6.6 Native American Consultation

County staff notified the affected tribes (Santa Ynez Band of the Chumash Indians, Coastal Band of the Chumash Nation, and Barbareno/Ventureno Band of the Mission Indians) on May 8, 2014 of the statutory 90 day consultation period. Staff received no requests for consultation.

7.0 PROCEDURES

The County Planning Commission may recommend that the Board of Supervisors adopt, adopt with revisions, or not adopt the 2015-2023 Housing Element Update.

8.0 APPEALS PROCEDURE

The recommendation of the County Planning Commission will be forwarded to the Board of Supervisors for its consideration. No appeal is required.

ATTACHMENTS

- A. Findings
- B. Proposed Final Negative Declaration
- C. Resolution, including Exhibit 1: 2015-2023 Housing Element
- D. Goals, Policies and Programs, 2009-2014 Housing Element
- E. Summary of Proposed Goals, Policies and Programs, 2015-2023 Housing Element
- F. California Department of Housing and Community Development, Letter, dated October 3, 2014
- G. Implementation Matrix
- H. Comment Letter, dated November 11, 2014
- I. Montecito Planning Commission Resolution

ATTACHMENT A: FINDINGS

1.0 CEQA FINDINGS:

1.1 Consideration of the Negative Declaration and Full Disclosure

The County Board of Supervisors has considered the Negative Declaration Case No. 14NGD-00000-00014 together with the comments received and considered during the public review process. The Negative Declaration reflects the independent judgment of the County Board of Supervisors, was completed in compliance with CEQA, and is adequate for this proposal. On the basis of the whole record, there is no substantial evidence that the project will have a significant impact on the environment.

1.2 Mitigation of Project Impacts

The County Board of Supervisors finds that in accordance with the environmental impact analysis provided in Case No. 14NGD-00000-00014, the project will not result in significant effects on the environment. Therefore, project conditions of approval which are intended to mitigate or avoid significant effects on the environment are not required.

1.3 Location of Documents

The documents and other materials that constitute the record of proceedings upon which this decision is based are in the custody of the Secretary of the Santa Barbara County Planning Commission, Dianne Black, Planning and Development, located at 123 East Anapamu Street, Santa Barbara, CA 93101.

1.4 Environmental Reporting and Monitoring Program

Public Resources Code Section 21081.6 requires the County to adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of approval in order to mitigate or avoid significant effects on the environment. The proposed project would not result in significant effects on the environment and, therefore, no conditions of approval for purposes of mitigation, environmental reporting, or monitoring program are required.

2.0 ADMINISTRATIVE FINDINGS:

2.1 Comprehensive Plan Amendment Finding

Government Code Section 65358 requires each Comprehensive Plan Amendment to be in the public interest. The proposed Comprehensive Plan Amendment to adopt the 2015-2023 Housing Element Update is in the public's interest as it identifies current demographic and employment trends that may affect existing and future housing demand, refines programs and policies that support the State's housing goals, and addresses barriers that result in market failures and ineffective planning.

2.2 *Housing Element Eight-year Update*

Government Code Section 65588 requires that each jurisdiction update its Housing Element periodically. The 2015-2023 Housing Element Update of the Santa Barbara County Comprehensive General Plan has been prepared pursuant to Government Code Sections 65358 and 65580 et seq. Pursuant to California Government Code Section 65585(b), the State Department of Housing and Community Development (State HCD) reviewed the Draft 2015-2023 Housing Element Update and reported its findings to the County in a letter dated October 3, 2014. State HCD's letter states "The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State housing element law (GC, Article 10.6). The enclosed Appendix describes revisions needed to comply with State housing element law." Staff has made the revisions recommended by State HCD and adoption of the 2015-23 Housing Element Update and therefore is in compliance with Government Code Section 65588 and other relevant sections of State housing element law.

5. HOUSING GOALS, POLICIES, AND PROGRAMS

Introduction

Pursuant to State law, the Housing Element must set forth a series of goals and policies to address the maintenance, preservation, improvement, and development of housing.¹ In addition, the Housing Element must include a program of actions that the County has already implemented, or intends to undertake, to achieve these goals and policies. Public input, economic analysis, and policy studies conducted as a part of this Housing Element update have underscored the importance of three themes that best describe the existing environment to which identified goals, policies, and programs must respond:

- **The current economy has changed the housing market.** The recession that began in 2008 resulted in a broad increase of housing affordability in communities throughout the unincorporated County. Yet, even with a decrease in housing prices, other challenges persist that have kept attainment of decent housing a struggle for some.
- **A new planning paradigm has emerged.** Changes in State housing law and the State's long term planning directive have pushed for a smarter policy framework that emphasizes the need to make the best use of limited land and resources. This new paradigm is one that mirrors many locally held planning traditions—those that help to preserve the County's rural heritage, along with the values expressed in each of the unique community planning areas of the County.
- Ongoing County efforts to increase **customer service** have resulted in the simplification, streamlining, and consolidation of numerous planning documents. Accordingly, the policy framework in the 2003-2008 Housing Element has been evaluated and changes are proposed to consolidate and remove redundant and/or irrelevant program goals, objectives, and policies.

Beyond framing the Housing Element update, these themes have provided the context for a thorough review of the effectiveness of the 2003-08 Housing Element (Appendix C), enabling a transition to a revised and improved set of goals, policies, and programs. Accordingly, the following five goals will guide local housing policy and program development for the duration of the current 2007-2014 Housing Element planning period:

- Enhance the Diversity, Quantity, and Quality of the Housing Supply;
- Provide Housing for Special Needs Groups;
- Provide Fair Access to Housing;
- Preserve the Affordable Housing Stock and Cultivate Financial Resources; and
- Maintain Cooperative Relationships and Efficient Government.

¹ GC § 65583(b) and (c)

The programs and policies necessary to implement these goals are derived primarily from the 2003-2008 Housing Element, as well as the County's established tradition of community planning. In addition, regulatory updates required by State law are implemented through Housing Element programs.

In total, this policy framework has proven to be an effective means of addressing the housing needs of all economic segments of the unincorporated population, while also upholding local norms and values. In all cases, the County continuously seeks to leverage Federal, State, and local financial resources to fund affordable housing programs and promote new housing opportunities through a balanced regulatory approach.

Table 5.1 – Proposed Draft Housing Element 2009-2014 Goals, Policies and Programs

Goal 1: Enhance the Diversity, Quantity, and Quality of the Housing Supply	
<p>Policy 1.1: Promote new housing opportunities adjacent to employment centers, and the revitalization of existing housing to meet the needs of all economic segments of the community, including extremely low income households, while bolstering the County’s rural heritage and supporting each unincorporated community’s unique character.</p>	<p>Program 1.1: Promote housing opportunities adjacent to employment centers through regional and local planning efforts, including the development of a Sustainable Communities Strategy (SCS) and Regional Housing Needs Allocation (RHNA), as facilitated by the Santa Barbara County Association of Governments. This will help ensure that community values are preserved, commute pressures and vehicle trips are reduced, rural areas are protected, fiscal and economic interests are upheld, and adequate housing is provided for each jurisdictions’ workforce.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, Redevelopment Agency</p>
	<p>Program 1.2: Increase the effectiveness of the Inclusionary Housing Program by establishing an IHP ordinance and relocating all IHP programmatic details from the Housing Element to the Land Use and Development Code (LUDC). This modification will improve the pre-existing program by: 1) allowing greater flexibility for the Board of Supervisors to modify the IHP when warranted, 2) eliminating the need for a General Plan update when changes to the IHP are required, and 3) allowing for sufficient detail to support a greater understanding of the program by the public and County staff. Based upon public feedback, best-practices, and third-party analysis, programmatic revisions of the IHP ordinance will then be considered. From the adoption of this Housing Element, until such time that the forthcoming IHP ordinance is approved by the Board of Supervisors, the existing IHP, as included in Appendix A – <i>IHP Background, Policy and Implementation</i> of this Housing Element shall apply.</p> <p>Funding Source: General Fund</p> <p>Timeline: Within Two Years of the Adoption of the Element</p> <p>Responsible Agency: Planning & Development, County HCD</p>
	<p>Program 1.3: Implement community enhancement and revitalization tools where warranted through the community planning process using strategies that promote affordability by design such as mixed-use, infill, and adaptive reuse. Currently,</p>

	<p>five community plan updates are underway in the communities of Los Alamos, Eastern Goleta Valley, Summerland, Mission Canyon, and Orcutt. One community plan, for the Santa Ynez Valley, was recently completed. Through the update process, staff will continue to provide information, analysis, and recommendations regarding how such tools may contribute to achieving the community's expressed goals and vision for housing.</p> <p>The County shall utilize the community planning process to identify new potential housing sites. As part of the ongoing community planning process, the County shall explore options to address housing needs by considering the use of form-based codes, overlays, or rezones which are compatible with the surrounding community character. In the context of the community planning process, the County should consider rezones which would establish housing opportunities on 20-30 acres within the County. Within these housing opportunity areas the County should consider establishing sites which are approximately 2-10 acres in size and have an effective density of 20 units an acre or greater, if such rezones can be found compatible with surrounding development and serviceable by infrastructure capacity.</p> <p>Funding Source: General Fund</p> <p>Timeline: Schedules for projects as complex as Community Plans are subject to fluctuation, due to uncontrollable variables such as environmental review processes, hearing agendas, and funding limitations. However, the County will attempt to adopt updated community plans within the following estimated timelines, as fiscal and staffing resources allow: Los Alamos Community Plan- December 2010 Eastern Goleta Valley Community Plan- July 2012</p> <p>Responsible Agency: Planning & Development, Redevelopment Agency</p>
	<p>Program 1.4: The following land use tools shall continue to be considered and/or used through the community planning and development review processes, as well as the zoning ordinance, to provide housing opportunities for all economic segments of the population, including extremely low income households:</p> <ol style="list-style-type: none"> 1) The Affordable Housing Overlay (AHO) zone. 2) Policies to encourage the development of unit types that are affordable by design, such as Residential Second Units, Farm Employee Dwellings, infill, and Mixed-use Development. 4) Permit streamlining efforts overseen by Planning and

- Development, and priority permit processing for projects with affordable units built on site.
- 5) Incentives for special types of housing, as illustrated in Appendix F – *Quality Housing Design and Development Incentives*.
 - 6) Administrative zoning modifications for new development approved via Development Plans.
 - 7) Board-approved discretionary reductions of development impact fees for projects with demonstrated public benefits, including the provision of on site affordable housing.

Funding Source:

General Fund and Permit Fees

Timeline:

Ongoing

Responsible Agency:

Planning & Development

Program 1.5: Utilize community plan updates as opportunities to consider and develop solutions for infrastructure constraints, which can be a barrier to the development of housing throughout the unincorporated County. Specifically, when updating a community plan, the future residential development allowed by the plan should be supported by either existing service infrastructure, or the plan should anticipate how this infrastructure can be improved and/or expanded to foster future housing opportunities.

Additionally, the County will consider the need for infrastructure expansion when reviewing the future use or sale of County-owned land. Prior to the sale of County-owned land, the subject property shall be evaluated for potential land use conflicts and other constraints that may make the property inappropriate for expansion of service infrastructure. If the property is determined to be appropriate for infrastructure facilities/improvements, the County shall contact applicable public and or private agencies and/or private to determine the level of interest and/or financial feasibility of developing the site with the appropriate level of service infrastructure.

Funding Source:

General Fund and Permit Fees

Timeline:

Ongoing

Responsible Agency:

Planning & Development

Program 1.6: Ensure quality housing design and community

	<p>compatibility via the continued use of regional BAR and Community Plan Design Guidelines.</p> <p>Funding Source: General Fund and Permit Fees</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p>
	<p>Program 1.7: Continue working with the Redevelopment Agency to support programs aimed at catalyzing community renewal through: 1) incentivizing investments in underutilized urban property (i.e., parking lots, church sites, commercial property, irregularly shaped lots), 2) infrastructure (i.e., streetscape improvements and parking), and 3) affordable housing, including homeless support infrastructure. Encourage cooperation between County HCD and Redevelopment Agency to provide funding and opportunities for redevelopment and economic enhancement. Continue to support the use of the Isla Vista Master Plan to contribute to the diversity and affordability of the housing stock in the County, adjacent to the County’s largest employer, University of California Santa Barbara.</p> <p>Funding Source: General Fund and Redevelopment Funds</p> <p>Timeline: Opportunities to be Reviewed on an Annual Basis</p> <p>Responsible Agency: Planning & Development, Redevelopment Agency</p>
	<p>Program 1.8: Continue to support and expand the use of the Innovative Building Review Program to streamline the permit process for projects meeting energy efficiency requirements. The existing IBRP supplies public information regarding energy efficient construction techniques and allows fast track permitting for projects with energy efficient designs. The program shall continue to be updated in response to changing development trends and technological progress regarding energy efficient building design.</p> <p>Funding Source: Permit Fees</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p>
	<p>Program 1.9: Seek opportunities to finance and support energy</p>

	<p>efficiency and renewable energy improvements for the market-rate and affordable housing stock in the County. Examples to be considered as part of this program include adoption of a Climate Action Strategy as directed by the Board in the Long Range Planning 2009-10 Work Program, implementation of a municipal energy efficiency financing district, and strategies to prioritize County affordable housing resources for projects that encourage energy efficiency improvements.</p> <p>Funding Source: General Fund</p> <p>Timeline: Within Three Years of the Adoption of the Element</p> <p>Responsible Agency: Planning & Development</p>
	<p>Program 1.10: Amend applicable County regulations to comply with the provisions of State Density Bonus Law, which is intended to increase the economic feasibility of affordable housing development for extremely low, very-low and low-income households. Specifically, amend Article II (Local Coastal Plan) to allow up to a 35% density bonus for applicable projects. The current Article II regulations only allow a 25% density bonus.</p> <p>Funding Source: General Fund</p> <p>Timeline: Within Three Years of the Adoption of the Element</p> <p>Responsible Agency: Planning & Development</p>
	<p>Program 1.11: Provide consultations for project applicants who want to incorporate the use of the State Density Bonus Law (SBDL) as part of their housing project. Staff will provide general knowledge on the use and applicability of the SBDL and assist project applicants in utilizing SBDL to enhance their housing project.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p>

	<p>Program 1.12: The County shall continue, and where feasible expand, its partnership with nonprofit housing providers such as the Housing Authority and People’s Self-help Housing. This partnership should be specifically leveraged to provide additional housing opportunities which are affordable at extremely-low income levels. Opportunities such as the use of State Density Bonus Law and the County’s Development Incentives listed in Appendix F should be utilized to encourage the development of such affordable housing. The County shall also consider the use CDBG, Housing Trust Fund, or similar funding sources to support the development of housing which is affordable at extremely-low income levels.</p> <p>Funding Source: CDBG and Redevelopment Funds</p> <p>Timeline: Provide Opportunity for Annual Consultations upon Stakeholder Request</p> <p>Responsible Agency: County HCD and RDA</p>
	<p>Program 1.13: The County shall continue to utilize the Isla Vista Master Plan in combination with redevelopment funds and equivalent resources to promote the creation of additional housing stock within the South Coast housing market area. Specifically, the County shall encourage the development of varied housing types which assist in satisfying the full spectrum of the County’s housing needs, including housing for families (e.g. two-bedroom units or larger) and low income households.</p> <p>Funding Source: CDBG and Redevelopment Funds</p> <p>Timeline: Annually review the effectiveness of the IVMP to provide housing units which satisfy the County’s various housing needs. Specifically, the Annual Report process should evaluate the IVMP’s effectiveness in providing a variety of housing types including housing for families (e.g. two-bedroom units or larger) and multifamily developments suitable in size (at least 20-30 units) to facilitate an assisted housing project with 100% of the units affordable to lower-income households. If Annual Reports on housing indicate that the IVMP is continually producing less housing than anticipated in the County’s Land Inventory, or a predominance of a single housing type which fails to meet the housing needs of the community, then additional rezones, overlays, or similar actions for the purpose of creating additional housing opportunities should be considered as part of the community planning process.</p> <p>Responsible Agency: County HCD and RDA</p>

Goal 2: Expand Housing for Special Needs Groups	
<p>Policy 2.1: Encourage housing that meets the requirements of special needs households, as identified per State law, and promotes housing diversity (i.e., size, type, tenure, location, and affordability levels).</p>	<p>Program 2.1: Provide housing consultation services to assist applicants understanding of the regulatory environment, applicable State laws and incentives, and local policies and incentives impacting the development of special needs housing, including the County reasonable accommodation procedure.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p>
	<p>Program 2.2: Continue to facilitate ministerial permit opportunities for emergency shelters and supportive housing, consistent with the provisions of Chapter 633, Statutes of 2007 (SB 2) which amended Government Code Sections 65582, 65583, and 65589.5. Currently, emergency shelters and supportive housing are treated as residential uses, are allowed with a ministerial Land Use Permit, and are subject to the same permitting process as other housing within the C-3 zone. As discussed in Chapter 3 of this Housing Element, adequate sites exist within this zoning designation to accommodate new emergency shelters and permit procedures are in compliance with State housing law.</p> <p>Funding Source: General Fund and Permit Fees</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, County HCD</p>
	<p>Program 2.3: Amend the County’s Land Use and Development Code (LUDC) to be consistent with Health and Safety Code Sections 17021.5 and 17021.6 regarding farmworker housing developed by <u>State-licensed</u> agricultural operators. Section 17021.5 requires that any employee housing providing accommodations for six or fewer employees be deemed a single-family structure, while Section 17021.6 requires that employee housing consisting of no more than 36 beds in a group quarters or 12 units or spaces designed for use by a single family or household be deemed an agricultural use. As such, no conditional use permit, zoning variance, or other zoning clearance or business taxes, local registration fees, use permit fees, or other fees shall be subject to these housing types which are not typically subject to uses of the same type in the same zone. The County will amend the necessary LUDC sections, with policy assistance provided</p>

	<p>by the Office of Long Range Planning.</p> <p>Funding Source: General Fund</p> <p>Timeline: Within Four Years of Housing Element Adoption</p> <p>Responsible Agency: Planning & Development</p>
	<p>Program 2.4: The County shall provide increased opportunities for the development of farmworker housing. This should include the provision of funding sources such as the Joe Serna Jr Farmworker Housing Grant Program, where available. Additionally, the County should continue to consider actions which will further streamline the permit process for agricultural employee housing. The County shall also provide opportunities for stakeholder input from growers, ranch owners, and other agricultural operators regarding the need and opportunities for additional farmworker housing.</p> <p>Funding Source: General Fund & Federal and State Housing Funds</p> <p>Timeline: Provide Opportunity for Annual Consultations upon Stakeholder Request</p> <p>Responsible Agency: Planning & Development and County HCD</p>
	<p>Program 2.5: Provide opportunities for administrative relief for housing projects that accommodate the needs of persons with disabilities and their families, consistent with Chapter 671, Statutes of 2001 (SB 520), which amended Government Code Section 65583(c)(3). Subject to Appendix B of this Housing Element, the requirements of applicable County zoning ordinances shall be waived by the Director of Planning & Development (or applicable Review Authority), if necessary, to comply with Federal and/or State fair housing and disability laws relating to reasonable accommodations for persons with disabilities.</p> <p>To increase the effectiveness of this practice, the County "Reasonable Accommodation" procedure shall be incorporated into the County Land Use and Development Code. The procedure will identify applicability, application requirements, review authority, the review procedure, and findings that will serve as the basis for the decision to grant or deny requests for reasonable accommodation. In addition, it will identify the process for appeals of the determination.</p> <p>Funding Source: General Fund</p> <p>Timeline:</p>

	Within Four Years of the Adoption of the Element Responsible Agency: Planning & Development
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Goal 3: Provide Fair Access to Housing	
<p>Policy 3.1: Promote equal housing opportunities for all persons in all housing types (ownership and rental, market-rate and assisted).</p>	<p>Program 3.1: Continue existing programs to provide a referral process and/or contracts with legal services for fair housing issues. The County currently contributes General Fund resources to the City of Santa Barbara for regional fair housing legal services. Additionally, the County will consider contributing additional funding to appropriate private legal service agencies to provide active fair housing legal services countywide.</p> <p>Funding Source: General Fund and CDBG</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: County HCD</p>
	<p>Program 3.2: Bolster support of the existing Fair Housing Public Outreach program by providing increased information via County websites, public pamphlets, informational handouts, and other means. In addition to public outreach conducted by the County, any contract for private fair housing legal services will require a public outreach component. This public outreach program shall be conducted in multiple languages and designed to provide information to community members from all special needs, ethnic, cultural, and economic spectrums.</p> <p>Funding Source: General Fund & CDBG</p> <p>Timeline: Within Three Years of Housing Element Adoption</p> <p>Responsible Agency: County HCD</p>

Goal 4: Preserve the Affordable Housing Stock and Cultivate Financial Resources	
<p>Policy 4.1: Preserve the affordable housing stock, maintain its affordability, improve its condition, and prevent future deterioration and resident displacement. Participate in available Federal and State housing subsidy and assistance programs and use the County's own resources in order to leverage maximum funding for the provision of affordable housing.</p>	<p>Program 4.1: Continue to access HOME, Community Development Block Grant, American Recovery and Reinvestment Act, and other resources provided by Federal, State, or regional entities to increase the efficiency of locally-generated IHP in-lieu fees collected for the express purpose of providing new and preserving existing affordable housing opportunities.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: County HCD</p>
	<p>Program 4.2: The County will consider the need for affordable housing when reviewing the future use or sale of County-owned land. Prior to the sale of County-owned land, the subject property shall be evaluated for potential land use conflicts and other constraints that may make the property inappropriate for residential development. If the property is determined to be appropriate for residential development, the County shall contact applicable departments (such as County HCD and the Redevelopment Agency) as well as private and non-profit affordable housing agencies to determine the level of interest and/or feasibility of developing the site with affordable housing.</p> <p>Funding Source: N/A</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: General Services</p>
	<p>Program 4.3: The County will continue to track affordable rental developments with expiring use restrictions and work with owners to ensure maintained affordability. County HCD will continue to manage a database which tracks the expiration dates of affordable housing covenants and restrictions. Prior to the expiration of these affordability restrictions, County HCD shall explore all opportunities to maintain this affordability. Such opportunities include but are not limited to: provision of rehabilitation funding to the property owner contingent upon an extension of the affordability restrictions, assistance to non-profit housing agencies or any other entities seeking to acquire and maintain government-assisted housing developments at risk of converting to market rate housing, or acquisition of the housing units with available local financing.</p>

	<p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: County HCD</p>
	<p>Program 4.4: The County will continue to work with non-profit organizations to implement a housing rehabilitation program for low-income homeowners. County HCD and Redevelopment Agency will continue their existing programs, as funding allows, and partner with local private and non-profit groups to acquire and/or rehabilitate rent-restricted or otherwise affordable housing. As previously discussed in this Housing Element, these programs will support projects similar to the Parkview project in Isla Vista, which rehabilitated 20 low income housing units.</p> <p>Funding Source: CDBG and Redevelopment Funds</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Redevelopment Agency, County HCD</p>
	<p>Program 4.5: Continue to support County and private non-profit programs which provide "soft" second mortgages or other financial tools to assist moderate-income, and in some cases, low-income home buyers. The County has already provided a letter of support to the Santa Barbara County Housing Authority enabling continued participation in its existing "soft" second mortgage program. The County shall continue to explore opportunities to support and secure additional funding for such programs.</p> <p>Funding Source: Various</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, County HCD, Redevelopment Agency</p>

Goal 5: Foster Cooperative Relationships and Efficient Government	
<p>Policy 5.1: Form collaborative professional working relationships with the public and providers of housing; and assist with the process of accessing and/or providing affordable housing opportunities. Identify and, where feasible, eliminate or reduce governmental constraints to the development of housing.</p>	<p>Program 5.1: Work cooperatively and form partnerships with Federal, State, and regional agencies, as well as private and non-profit entities to apply for public funding to support projects demonstrating creative strategies to address affordable housing needs.</p> <p>Funding Source: Various</p> <p>Timeline: Provide Opportunity for Annual Consultations upon Stakeholder Request</p> <p>Responsible Agency: Planning & Development, County HCD, Redevelopment Agency</p>
	<p>Program 5.2: Participate in regional planning and housing programs with incorporated cities, public and private housing agencies such as the Housing Authority, Habitat for Humanity, as well as other stakeholders as appropriate. As part of this effort the County shall pursue further partnership programs such as the 10-year Plan to End Chronic Homelessness.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, County HCD, Redevelopment Agency</p>
	<p>Program 5.3: Facilitate public outreach regarding housing opportunities such as Residential Second Units, Farm Employee Dwellings, and permit streamlining. In addition, the County shall provide information on its website and provide literature detailing the opportunities to develop housing which is affordable by design or with price restrictions.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p>

	<p>Program 5.4: Continue to utilize Planning and Development's process improvement efforts to streamline the County's permit process and remove regulatory barriers to the development of new housing. Planning and Development will continue to meet, and incorporate input from, community stakeholders and housing developers regarding appropriate streamlining efforts to encourage the permitting of additional housing.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development</p>
	<p>Program 5.5: Continue to utilize new technology and data to monitor and assess housing development and the affordability of housing. The County shall continue to develop more efficient housing tracking options in its Accela permit tracking system. The County will also provide support to Federal, State, and regional authorities to successfully implement the 2010 Census which will provide valuable information regarding population and housing.</p> <p>Funding Source: General Fund</p> <p>Timeline: Ongoing</p> <p>Responsible Agency: Planning & Development, County HCD</p>

ATTACHMENT G: IMPLEMENTATION MATRIX

Programs Budgeted and Scheduled		
Program #	Program Name	Targeted Completion
Program 1.2	Monitoring IHO	Yearly, part of Annual Report
Program 1.3	Community Plan Rezones	Summer 2015 - EGVCP
Program 1.7	IV Master Plan	Submit to CCC Summer 2015
Program 1.9	Energy Efficiency Policy	Winter 2014-15 – ECAP
Program 1.13	IV Monitoring	Yearly, part of Annual Report
Program 1.15	Mixed Use Zoning	Summer 2015 – EGVCP

Programs Targeted for Completion within One Year of Adoption	
Program #	Program Name
Program 1.16	DR Zone Modifications

Programs Targeted for Completion within Two Years of Adoption	
Program #	Program Name
Program 2.2	Special Needs Housing Regulations
Program 2.3	Farmworker Employee Housing Law Consistency Amendments
Program 2.5	Fair and Safe Special Needs Housing
Program 2.7	Definition of Family
Program 2.8	Transitional and Supportive Housing

Programs Targeted for Completion within Three Years of Adoption	
Program #	Program Name
Program 1.4	Tools to Incentivize High-Quality Affordable Housing
Program 1.10	State Density Bonus Law – Article II Consistency
Program 1.14	Supplemental Density Bonus
Program 2.6	Senior Housing and Support Uses
Program 3.2	Fair and Safe Housing – Public Outreach

Programs Targeted for Completion prior to Next Housing Element Cycle	
Program #	Program Name
Program 1.17	Minimum Density Residential Zone

** Programs not included in the matrix are ongoing.*

Note: Housing Element implementation is subject to staffing and funding availability. The County’s Long Range Planning Division will identify Housing Element programs for implementation on an annual basis during the development of its annual work plan.

Buck, Oksana

From: Kenan Ezal [Kenan.Ezal@cox.net]
Sent: Tuesday, November 11, 2014 4:02 PM
To: Buck, Oksana
Cc: Brown, Cecilia; Valerie Olson; Wolf, Janet; Barb Kloos; Bell, Allen
Subject: Comments on: Draft Negative Declaration of Housing Element 2015-2023

Hello Ms. Buck,

My name is Kenan Ezal, although I am (apparently) still a member of the Goleta Valley Planning Advisory Committee (GVPAC), I am writing this e-mail solely as a member of our community.

The Draft Housing Element Update does a great job of summarizing the state law, housing needs and constraints of our community. I do, however, have some concerns regarding several of the proposed programs, some of which are carried forward from the prior housing element.

1. Program 1.3 has been carried over from the last Housing Element Update and is fraught with problems. In fact, not only is the wording very specific, but it is (ironically) highly ambiguous.
 - a. For example, Program 1.3 states: “*In the context of the community planning process, the County should consider rezones which would establish housing opportunities on 20-30 acres within the County.*”
 - i. This statement clearly implies that the County is to look for 20-30 acres within the entire County for housing opportunity sites that total 20-30 acres, but not all of it within in each community planning area.
 - ii. However, the policy is also supposed to apply as “*part of the ongoing community planning process.*” So, in the last Goleta Valley Community Plan update, the County interpreted Program 1.3 to mean that the 20-30 acres requirement applied entirely to within the Eastern Goleta Valley area. This means that each time a new community plan update is in process, each community should find 20-30 acres within its own boundaries for housing opportunity sites.
 - iii. This language needs to be clarified so it is crystal clear what each community plan update will be responsible for.
 - b. Under Timeline for Program 1.3, only the Eastern Goleta Valley Community Plan is mentioned. Does this mean that no other communities will be required to follow Program 1.3???
 - c. Within the Program 1.3 housing opportunity sites, the program further states that “*the County should consider establishing sites which are approximately 2-10 acres in size and have an effective density of 20 units an acre.*”
 - i. During the EGVCP update this statement was interpreted to imply that the 2-10 acres had to be continuous. It could not be, for example, two one-acre lots. This is overly restrictive and does not provide sufficient flexibility in planning and doesn’t allow mixing of different densities to mitigate the negative effects of high-density housing.
 - d. Program 1.3 also states that the rezones should be considered “*if such rezones can be found compatible with surrounding development and serviceable by infrastructure capacity.*”
 - i. What about compatibility with the Community Plan goals and policies? The Policy should only be considered if the results are compatible with surrounding development and is consistent with the Community Plan goals and policies.
 - ii. For example, conservation of agriculture is an objective of the EGVCP. Yet, Program 1.3 would result in rezoning of agriculture if other policies are not considered.

- e. Overall, Program 1.3 attempts to be precise, but fails. Wouldn't it be better to let the community planners to figure out ways in which to meet the housing needs without such specific (yet ambiguous) language???
 - f. Hence:
 - i. Program 1.3 should be re-written with more general wording to provide greater flexibility in planning.
 - ii. Program 1.3 should clearly state that the results must abide by the Community Plan objectives and policies.
2. Program 1.4 should also provide incentives for owners of illegal RSUs to come forward and obtain the necessary permits.
 3. Program 1.14 would increase density by 100% for select projects in specific zones. The proposed program is very general and does not even specify what the specific zones are going to be. I realize that this is only something that "shall" be considered, but I would like to understand the approval process of such a program. Is it purely administrative, or does it have to go through the Planning Commission and Board of Supervisors?
 - a. Does the word "shall" imply that such a program will be adopted, or only that it will be considered for adoption? Without details of such a program the prior possibility cannot be accepted.
 4. Program 1.16 proposes to modify the Design Residential zone standard to effectively increase developable area. If this is done, it would destroy the original purpose of the DR zone!
 - a. This is a bad idea. The reason is that there are other zone standards that would accomplish the same goal. Changing the DR zone only reduces the type of zones available for planners because they all start to converge to the same (denser) zone definition.
 - b. If another zone is desired, then create a new standard. Don't change an existing one. Creating a new standard provides more flexibility in planning, not less.
 - c. This program also goes the wrong way in that it reduces parking requirements, while increasing density.
 5. Program 1.17 appears to suggest creating a new zone with a minimum density guaranteed by right. As long as this is a new zone, not a redefinition of an existing one, then this is a good idea.
 - a. Planners should always be given more flexibility, not less. So creating a new zoning standard is ok, but removing or modifying an existing zoning standard is not because it limits flexibility.
 - b. Removing flexibility forces planners to all move in one (possibly undesirable) direction.

Sincerely,

-Kenan Ezal

Kenan Ezal
1035 Ocean Vista Lane
Santa Barbara, CA 93111
Tel: (805) 964-2694
Email: Kenan.Ezal@cox.net