

**Brianda Negrete**

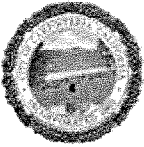
General Public Comment

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**From:** Brian Barrett <BrianB@carpinteriaca.gov>  
**Sent:** Tuesday, February 28, 2023 3:50 PM  
**To:** PAD LRP Housing Element; sbcob  
**Cc:** Dave Durflinger; Steve Goggia; Nick Bobroff  
**Subject:** City of Carpinteria Response to Santa Barbara County Draft 2023-2031 Housing Element Update  
**Attachments:** Revised Final Feb 2023 Letter to County re HE (25258544.3).pdf  
**Categories:** Public Comment

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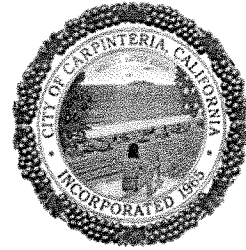
Good Afternoon, please find attached the City of Carpinteria's Response to the Santa Barbara County Draft 2023-2031 Housing Element Update.



**Brian C. Barrett, CMC, CPMC**

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# CITY of CARPINTERIA, CALIFORNIA



February 28, 2023

Board of Supervisors  
County of Santa Barbara  
c/o Jessi Steele, Long Range Planning Division Via email: [housingelement@countyofsb.org](mailto:housingelement@countyofsb.org)

Re: Santa Barbra County Draft 2023 – 2031 Housing Element Update

Dear Chair Williams and Honorable Members of the Board of Supervisors:

The City of Carpinteria has been closely following the County Housing Element Update process. We appreciate the challenges faced by the County and other local jurisdictions, ourselves included, in crafting a Housing Element Update that satisfies our respective regional housing needs assessment (RHNA) allocations and meets HCD's high bar for certification. We recognize the need for all areas of the County to share in meeting regional housing needs and that difficult decisions must be made concerning where and how to accommodate needed housing.

The City of Carpinteria City Council offers these comments on the Draft 2023 – 2031 Santa Barbara County Housing Element in the spirit of interagency cooperation and collaboration on housing policies that best serve the Carpinteria Valley and its residents. In consideration of the need to provide the state-mandated housing and, in particular, affordable housing, in southern Santa Barbara County, we are requesting two items:

- Modifications to the proposed housing sites in the Carpinteria Valley; and
- County commitment to implement policies and programs aimed at preventing displacement and promoting affordable housing.

## **Proposed Housing Sites in the Carpinteria Valley**

Agriculture remains an important element of the Carpinteria Valley's identity and economic base, and the desire to protect and preserve the Valley's agricultural heritage going forward is critical. State Housing Element Law requirements to plan for adequate housing sites do not take precedence over the Resource Protection policies of the California Coastal Act ("Coastal Act") and as embodied in the policies and regulations of County and City's respective Local Coastal Programs ("LCPs"). Guidance from the Coastal Commission on this issue cites the need to instead harmonize State Housing laws with Coastal Act policies.

The County's Draft Housing Element fails to adequately take into account the Resource Protection policies of the Coastal Act, including Coastal Act policies embodied in the County's LCP, with regard to protection of Agricultural Resources. Numerous County and City LCP Policies address Agricultural Buffers and the need to protect agricultural lands/operations from urban residential development (see, e.g., County Article II, Section 35-144O- Agricultural Buffers, Appendix H: Agricultural Buffer Implementation Guidelines and Santa Barbara County Right to Farm Ordinance).

Our position that high density urban development is not appropriate for rural agricultural areas along the City's edges is further supported by numerous adopted policies found in both the County's and City's respective certified LCPs, including but not limited to:

**County Comprehensive Plan Agricultural Element Policy and California Coastal Act § 30241.** *The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:*

- *By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban uses.*
- *By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.*
- *By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.*
- *By developing available lands not suited for agriculture prior to the conversion of agricultural lands.*
- *By assuring that public service and facility expansions and non-agricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.*
- *By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b) of this section, and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.*

**City Policy LU-3a:** *New development shall occur contiguous to existing developed areas of the city. Higher density in certain residential neighborhoods and for residential uses in commercial districts shall be provided as a means to concentrate development in the urban core consistent with zoning designations, particularly where redevelopment of existing structures is proposed.*

**California Coastal Act § 30250.** *(a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.*

Specifically, in the Carpinteria Valley, sites identified as the “Van Wingerden 1” potential rezoned site and the “Bailard” pending housing project, should be eliminated because of impacts to coastal agricultural lands. Wise planning practices call for higher residential densities to occur within or immediately adjacent to the urban core. City and County land use policies and the Coastal Act support these practices. These two sites contradict this fundamental principle by proposing the highest densities found in the Carpinteria Valley at the very edge of the City, outside the urban-rural boundary, at significant distance from the urban core, with no immediate access to pedestrian, bicycle and public transit routes, and not within reasonable walking distance to grocery shopping and other necessities and conveniences of daily living.

We also do not believe that these sites have the potential to meet state regulations for conversion of agricultural land/use to residential use. The Coastal Act section 30242 expressly identifies that lands suitable for agricultural use shall not be converted to other uses unless continued agricultural use is not feasible or such conversion would preserve prime agricultural land or concentrate development within a developed area. Consistent with this Coastal Act policy, the City is closely scrutinizing potential rezones of agricultural lands within the City to avoid conversion of other agricultural land within the Carpinteria Valley and to concentrate residential development within its urban boundaries. However, the City Council firmly believes that the County and the Coastal Commission cannot make these findings for the Van Wingerden 1 and Bailard sites for the reasons stated above.

While the bar remains high for consideration of conversion of agricultural use and land, the City believes the “Van Wingerden 2” site may appropriately be considered given its location situated along a major transit route, its adjacency to existing urban development on two sides, and what appears to be adequate ingress/egress opportunity.

Lastly, we continue to urge the County to explore and identify additional potential sites for infill development opportunities throughout the unincorporated South County’s urbanized and suburban areas. More specifically, the County should be identifying and prioritizing underutilized commercial, office, residential, and governmental properties within these urban areas rather than relying so heavily on “greenfield” development opportunities on agricultural lands outside of the urban-rural boundary. In addition to having a better chance for being found consistent with Coastal Act resource protection policies, such infill opportunities that are closer to job centers could have a more meaningful impact on achieving a regional jobs-housing balance and reducing vehicle miles traveled, as encouraged by Draft County Housing Element Policy 1.3.

## **Request for Policies and Programs aimed at preventing displacement and promoting affordable housing**

We have a common interest in helping to ensure the availability of housing for workers in the agricultural, service and hospitality industries because these are important parts of the regional economy and wages are typically too low to keep pace with housing markets. Housing markets in attractive coastal areas, like Carpinteria, are heavily influenced by factors other than supply, such as demand for vacation rentals and second homes. These factors we expect will continue to contribute to escalating housing prices despite planned growth in supply.

As such, promoting growth and relying on development purported to be “affordable by design” will not be sufficient to meet the housing needs of the region. Government interventions will be required in order to provide housing that is available and that is affordable to many people that work in the City and in the Carpinteria Valley. We urge the County to join the City in developing measures to address this such as:


- Prioritize production of rental housing units over ownership units;
- Prioritize housing for agricultural and service workers;
- Adopt inclusionary requirements to achieve an amount of lower income rent restricted units significantly greater than provided for in state laws;
- Prohibit vacation rentals for multi-family residential housing built in the Carpinteria Valley, including prohibitions on corporate and limited liability company ownership models;
- Establish a vacancy tax and/or other measures to ensure second home use contributes to affordable housing development and preservation;
- Enact rent stabilization on multi-family rental housing; and
- Establish no-cause eviction prohibition regulations beyond state law requirements.

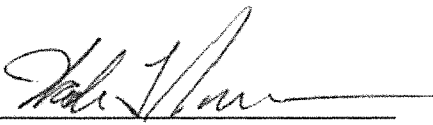
The City included each of the above measures in its Annual Work Plan and plans to incorporate these measures in our Housing Element to advance the City’s evidence to prevent displacement of existing residents and provide affordable housing for South County essential workers. The County should incorporate similar measures in its Housing Element policies and programs to ensure that the County and City move forward collaboratively to advance truly affordable housing policies within the Carpinteria Valley.

Lastly, we are seeking a commitment from the County to collaborate with the City to determine appropriate mitigation for development impacts, (e.g., traffic, parks, etc.) that will occur in the City as a result of these higher residential densities occurring outside the City limits, and to require these to be addressed as a part of project development approval. Such mitigation is critical to ensure that new and existing development have access to the public resources that make south Santa Barbara County a desirable place to live and work.

Thank you in advance for your consideration of this request.

Sincerely,

  
Councilmember Mónica J. Solórzano

  
Councilmember Wade T. Nomura

  
Councilmember Roy Lee

  
Vice Mayor Natalia Alarcon

  
Mayor Al Clark

Cc: [sbcob@countyofsb.org](mailto:sbcob@countyofsb.org)