



February 28, 2023

Planning and Development Department
County of Santa Barbara
Attention: Jessi Steele
123 E. Anapamu Street
Santa Barbara, CA 93101

RE: Comments on the Santa Barbara County Draft Housing Element Update

Dear Ms. Steele,

The League of Women Voters Santa Barbara appreciates the opportunity to provide input on the County's Housing Element Update. The League is actively involved in housing issues in the region. In the spirit of supporting solutions to the South County's housing crisis, especially for low- to moderate-income households, we suggest the following changes to the Draft Housing Element Update:

Adjust the Underlying Assumptions of Rezoned Properties. We applaud the County staff for their efforts to identify viable sites that can be rezoned to meet the state-mandated Regional Housing Needs Allocation (RHNA) targets. However, the underlying methodology used to determine the number of housing units these sites will produce at the low- and moderate-income levels is unrealistic. Specifically, we question the assumptions in Appendix E that each of these new rezoned sites will generate 50 percent low-income units and 25 percent moderate-income units. The pending projects on the south coast identified in Appendix E demonstrate this unrealistic assumption. Only 231 units out of 1,186 units, or just 19 percent, are proposed at an affordable level. Also, it is very unlikely that a 50% low-income inclusionary provision could be enacted without significant developer push back and eventually legal challenges.

Identify More and Explain Criteria for County-owned Sites. The County should identify additional publicly-owned sites that are suitable for rezoning for affordable housing. We request that the County's plan provide an inventory and map of all publicly-owned sites, including those owned by the County, School Districts and other Special Districts. For purposes of transparency, we request the Housing

Element Update include the criteria used to determine which sites are suitable for rezoning and which are not.

Explore and Enact a Permanent Revenue Source for Affordable Housing. To produce significant amounts of very low-, low- and moderate-income housing, the County needs to find a permanent, steady source of funds for the Housing Authority and non-profit developers. This used to exist when the County had a redevelopment agency. Since 3,853 or 68% of the County's next cycle housing units are supposed to be for our very low-, low-, and moderate-income workforce, a new source of permanent funds is critical. We understand that the Board of Supervisors gave this direction to staff at their hearing on Feb. 14. We urge that this be a very high priority program to tackle upon adoption of the Housing Element. In addition to studying all the options available to the County for generating revenue (e.g., vacancy taxes, transient occupancy tax, "mansion transfer tax," and bonds), we would like the County to expedite the timeline for conducting a study, considering options and enacting a permanent source of funding given that it is unlikely the County will make meaningful progress toward meeting its affordable housing RHNA targets without funding.

Clarify Workforce Housing Definitions. In several programs, the term "workforce housing" is used to identify housing for those making 120-200% of AMI. While we recognize the need to support housing for the upper levels of our local workforce, labeling this as "workforce" housing implies that lower income households are not a part of the critical local workforce. We believe that housing is urgently needed for local essential workers, such as nurses, teachers, firefighters, and police officers. It is also needed for other important workers in our area, such hotel and restaurant workers, landscapers, and housekeepers. We request you find another way to reference this housing category, and in fairness, include "workforce" in front of "very low-income," "low-income" and "moderate-income" housing too.

Strengthen Tenant Protection Measures. Fifth, we request that Program 17, Tenant Protection and Fair Housing Services, be enhanced to further strengthen tenant protections, including against unsustainable rent increases and "reno-victions".

Ensure Significant Affordable Housing if Agricultural Parcels Rezoned. Rezoning of agricultural lands for housing should only occur when significant amounts of affordable housing would result, and after rezoning other lands in the urban area, especially publicly-owned sites. When that can be assured, factors to consider in the conversion of agricultural sites to affordable housing should include:

- Location, with a priority given to property in or near an urban area.
- Quality of agricultural land, with priority given to non-prime agricultural lands.
- Use of the parcel, with priority given to properties not in active agricultural use.
- Use of surrounding parcels, with priority given to properties that do not abut active agriculture to avoid future agriculture – urban conflicts.

Finally, we are supportive of a number of the new programs in the Housing Element draft, especially Program 12, to prioritize use of County property for lower income housing; Program 14 and 15 which enforce state laws requiring water and sewer districts to prioritize service to affordable housing projects; Program 18, to identify a affordable units at risk for conversion to non-affordable units and find funding to extend their affordability covenants; Program 21, to study and develop an ordinance to give preference to local residents and workers for units subsidized by the County; and, Program 23, to complete a workforce housing study by June 2023.

Thank you for your consideration of our comments. We look forward to reviewing and commenting on the proposed rezone sites and program details as they are developed and adopted.

Sincerely,



Dianne Black
Housing Committee



Vicki Allen
VP Communications