



# County of Santa Barbara Planning and Development

Glenn S. Russell, Ph.D., Director

Dianne Black, Director of Development Services

Jeffrey S. Hunt, Director of Long Range Planning

February 16, 2012

To: Board of Supervisors

From: Glenn S Russell, Ph.D. Director

Jeff Hunt, AICP, Director of Long Range Planning

Subject: Letter from State Housing & Community Development  
Concerning Goleta Community Plan Update

The State Housing and Community Development Department submitted the attached letter dated February 13, 2012, subsequent to the docketing of the Board letter concerning the Goleta Community Plan Update Project Initiation of Environmental Review.

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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February 13, 2012

Mr. Jeff Hunt, Director  
Long Range Planning Division  
County of Santa Barbara  
123 East Anapamu Street  
Santa Barbara, CA 93101

Dear Mr. Hunt:

**RE: Santa Barbara County's Housing Element and Community Plan Updates**

Thank you for your letter received December 23, 2011 requesting review of pending actions and consistency with the Department's February 9, 2011 findings and housing element law. Pursuant to Government Code Section 65585(c), the Department has also considered comments from Ms. Barbara Kloos, Eastern Valley Coalition, Messrs. Kirk Ah Tye, California Rural Legal Assistance and Michael Towbes, The Towbes Group.

The Department's February 9, 2011 finding of compliance with housing element law was conditioned on, among other things, rezoning sites to higher densities (e.g., 20 units per acre) as part of community plan updates including the Eastern Goleta Valley Community Plan by July 2012. The importance of rezoning was reinforced in the Department's August 23, 2011 letter.

Your letter describes the proposed land-use changes and zoning, particularly for two sites where zoning would allow an "effective" density of 20 units per acre. The County must address the following to continue compliance with housing element law:

*Effective Density and Financial Feasibility:* Based on the correspondence and conversations with you, the proposed zoning would allow multifamily development up to 20 units per acre. You have indicated the zoning would include development standards such as parking and heights that do not impede achieving 20 units per acre. The zoning would allow a maximum number of units on the developable portion of the site (area left over once open space requirements are met – 40 percent of the site). The Department understands undevelopable areas such as steep slopes may be utilized to meet open space requirements. However, requiring an "effective" density or net density toward maximum allowable densities could constrain housing supply and the feasibility of development. The County should consider the negative impacts of the limit on the total number of units allowed per site on the financial feasibility of development. For example, only allowing 204 units on 17 acres could constrain development or financially preclude development of the site and impact the potential for housing affordable to lower-income households.

*Timing:* As noted in the Department's prior review, sites should be zoned by July 2012, meaning actual zoning in place (text and map) that implements the land-use designation with development standards such as heights and parking. While the Department recognizes the challenges, resources and time necessary to complete the planned rezoning, the County must meet the July deadline.

*Site Size:* Some of the sites, particularly sites less than one acre do not meet the criteria described in Program 1.3 (i.e., at least 2 acres in size).

As described in prior correspondence, Program 1.3 implementation is critical to demonstrate adequate sites. Promoting realistic and sustainable residential opportunities in the Goleta Valley Community Plan will provide equitable and affordable housing choices to meet the community's diverse housing needs, including families and workers. If the County fails to implement Program 1.3 by July 2012 to rezone to higher densities, the element will no longer identify adequate sites and comply with State housing element law.

The Department remains committed to working in partnership with you and your staff in implementing the County's housing and land-use programs. If you have any questions or we can provide assistance, please contact Paul McDougall, of our staff, at (916) 322-7995.

Sincerely,

A handwritten signature in cursive script that reads "Glen A. Campora".

Glen A. Campora  
Assistant Deputy Director