

Attachment 6

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

1800 Third Street, Room, 430
Sacramento, CA 95811
(916) 323-3177 / Fax (916) 327-2638
www.hcd.ca.gov



August 23, 2011

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

The Department's February 9, 2011 finding of housing element compliance was conditioned on, among other things, the implementation of Program 1.3. This Program commits the County to rezone sites to higher densities as part of community plan updates including the Eastern Goleta Valley Community Plan by July 2012.

Specifically, compliance was conditioned on the County's commitment to rezone at least 20-30 acres at densities of 20 units per acre or greater. This could, for example, be met by rezoning 20 acres at 20 units per acre in the Goleta Community Plan.

Rezoning to higher densities is crucial to addressing a variety of policy objectives affecting affordability, climate change, improving job/housing relationships and maximizing the use of land to preserve natural resources. Providing higher residential densities near transit, jobs and a mix of uses promotes alternatives to driving and opportunities to reduce greenhouse gas emissions. Increasing capacity for higher density development in the Goleta area, for example, provides a unique opportunity to meet housing, economic and environmental goals given the proximity and magnitude of job concentration. Increasing residential densities also maximizes the ability to accommodate housing needs in a smaller sustainable development footprint to protect and preserve open space and natural and agricultural resources. Higher density development patterns can play a key role in the reduction of emissions pursuant to SB 375 and support implementation of Phase 1 of the County's Climate Action Strategy.

The Department recognizes the challenges, resources and time necessary to complete the planned rezoning. Making good progress in implementing Program 1.3 to rezone higher density in the Goleta Valley Community Plan is necessary to meet the July 2012 deadline. The current draft Goleta Valley Community Plan does not appear to include sufficient and realistic opportunities for higher density residential development. The County should consider the importance of rezoning to higher densities and how it will implement Program 1.3 to meet the conditions of the Department's finding of compliance.

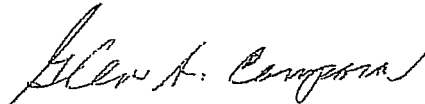
Attachment 6

Mr. Jeff Hunt, Director
Page 2

Program 1.3 implementation is critical to demonstrate adequate sites. Most of the County's higher density sites (e.g., Isla Vista, State Street Bowtie Corridor) have potential for non-residential uses and are smaller sites with existing uses. These conditions constrain residential development potential and impact development feasibility and affordability. Promoting realistic and sustainable residential opportunities in the Goleta Valley Community Plan will lessen reliance on sites with difficult conditions and provides equitable and affordable housing choices to meet the community's diverse housing needs, including families. If the County fails to implement Program 1.3 by July 2012 to rezone higher densities, the element will not 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 at (916) 322-7995.

Sincerely,



Glen A. Campora
Assistant Deputy Director

Attachment 6

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

1800 Third Street, Suite 430
P. O. Box 952053
Sacramento, CA 94252-2053
(916) 323-3177 / FAX (916) 327-2643
www.hcd.ca.gov



February 9, 2011

Ms. Chandra L. Wallar
County Executive Officer
County of Santa Barbara
105 East Anapamu Street
Santa Barbara, CA 93101

Dear Ms. Wallar:

RE: Review of the County of Santa Barbara's Adopted Housing Element

Thank you for submitting Santa Barbara County's housing element adopted November 2, 2010 and received for review on November 12, 2010. The Department is required to review adopted housing elements and report the findings to the locality pursuant to Government Code Section 65585(h).

As you know, the Department's June 11, 2010 review found Santa Barbara County's revised draft housing element addressed the statutory requirements of housing element law. The finding was conditioned on including a program(s) to annually evaluate the effectiveness of sites identified in the Isla Vista Master Plan (IVMP) and revising Program 1.3 to include a commitment to rezone higher density sites as part of the community plan updates. As the adopted element includes programs as described above and is substantially the same as the revised draft, the Department finds the element in compliance with State housing element law (Article 10.6 of the Government Code).

Please note, however, the Department's finding of compliance is conditioned on the implementation of Program 1.13 to annually evaluate the effectiveness of sites identified in the IVMP and identify additional sites and strategies as necessary. Program 1.13 is necessary to demonstrate adequate sites given the potential for non-residential uses, the extent of non-vacant and small sites (less than three fourths of an acre) in the IVMP. In addition, the Department's finding is conditioned on the implementation of Program 1.3 to rezone sites to higher densities as part of community plan updates including updating the Eastern Goleta Valley Community Plan by July 2012.

Attachment 6

Ms. Chandra L. Wallar, County Executive Officer
Page 2

Further, Program 1.2 to mitigate the impact of regulatory requirements and modify the land-use and development code and Program 1.4 to establish land-use tools to promote a variety of housing opportunities are necessary to demonstrate compliance with housing element law. As a result, the County must monitor and report on the implementation of these programs through the annual progress report, required pursuant to Government Code Section 65400. If these programs are not effective in mitigating regulatory constraints or facilitating the development of a variety of housing types, the element should be amended to identify alternative strategies and add or revise programs, as appropriate.

Maintaining adequate sites at appropriate densities to accommodate Santa Barbara County's regional housing need, including lower-income households, throughout the planning period is required pursuant to Government Code Section 65863. In addition, Section 65863 specifies no local government action shall reduce, require or permit the reduction of, the residential density or allow development at a "lower residential density" for any parcel identified in the site inventory unless the local government makes written findings, the reduction is consistent with the adopted General Plan, and the remaining sites identified in the element are adequate to accommodate the jurisdiction's share of the regional housing need. As defined by statute, "a lower residential density" refers to allowing fewer units on the site than were projected within the sites inventory of the housing element. As noted in the prior review, the County should adopt a program to facilitate compliance with these requirements. However, it does not appear a program was adopted. As a result, the County should establish a procedure to monitor approved development relative to capacity estimates in the housing element to ensure compliance with Section 65863.

The Department appreciates the efforts and cooperation of Messrs. Nathan Eady, Senior Planner, Peter Imhof, Supervising Planner, and Paul Clementi, Assistant Planner, throughout the course of the review. We wish Santa Barbara County success in implementing its housing element and look forward to following its progress through the General Plan annual progress reports pursuant to Government Code Section 65400. If the Department can provide assistance in implementing the housing element, please contact Paul McDougall, of our staff, at (916) 322-7995.

Sincerely,



Glen A. Campora
Assistant Deputy Director

Attachment 6

Santa Barbara County Housing Element

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>

Attachment 6

Santa Barbara County Housing Element

	<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
--	--