

September 3, 2008

(By Express Mail)

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#4

**Re: Santa Barbara County's Continued Housing Element  
Deficiencies Call for Decertification**

Dear Ms. Creswell and Mr. McDougall:

As directed in the June 16, 2008 Department of Housing and Community Development (HCD) letter, the County of Santa Barbara was instructed to include an analysis demonstrating the Isla Vista Master Plan (IVMP) residential capacity's suitability and availability during the 2003-2008 planning period, pursuant to the California Government Code. The County of Santa Barbara's July 21, 2008 response letter fails to provide a comprehensive analysis based on the acceptable methodologies located in the Government Code and as outlined in the June 16<sup>th</sup> HCD letter.

Below are the particular deficiency areas:

**1. Demonstrate Compliance with By-Right and Size Requirements Pursuant to Government Code Section 65583.2 (h) and (i).**

**a. Lack of Compliance with By Right Development:**

Many of the identified rezone parcels and realistic residential capacity do not provide "use-by-right" privileges. As stated in Government Code Section 65583.2 (i), "For purposes of this section and Section 65583, the phrase "use by right" shall mean that the local government's review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a "project" for purposes of Division 13

(commencing with Section 21000) of the Public Resources Code.”<sup>1</sup> However, the applicable IVMP zoning regulations require that a Development Plan shall be approved, contingent upon established development thresholds.

The proposed IVMP Community Mixed Use Zone (CM) code identifies that, “Prior to the issuance of any coastal development permit for buildings and structures which total 7,000 or more square feet in gross floor area or where on-site buildings and structures and outdoor areas designated for sales or storage total 20,000 square feet in size, a Development Plan shall be approved as provided in LUDC Sec. 35.82.080 (Development Plans).”<sup>2</sup>

In the provided draft appendix E1, Table 2 – Analysis of Realistic Development Capacity – IVMP Downtown Sites (Attachment), the County of Santa Barbara estimates a realistic capacity of 404 residential units. Appendix E1 – Table 2 assigns a realistic development capacity with IVMP incentives to each identified rezone site. Within the thirteen sites provided, the projected residential capacities range from 20 to 52 units per site.

Assuming at a minimum that only 400 square-foot studio units were proposed, the total square footage would be a minimum of 8,000 square feet (20 units x 400 square feet = 8,000 square feet). Given the estimated residential capacities of the sites, every IVMP Downtown site project would be in excess of the 7,000 or more gross floor area threshold, thus requiring a Development Plan approval, pursuant to the processing requirements within the IVMP Community Mixed Use Zone (CM) code. Development Plan approval is a discretionary action of local government and therefore does not constitute a “use-by-right” application. As articulated in the County’s Zoning Ordinance, the “discretionary” action of a Development Plan approval requires that the decision maker(s) make findings in order to support a given project. Many of the required findings relate to size, location, intensity, mitigating impacts, compatibility with surrounding character, etc. The nature of these findings are often controversial and provide the decision maker(s) with extremely broad discretion to deny a project.

Likewise, the proposed IVMP Mixed Residential Design Zone (MRD) code identifies that, “Final Development Plan approval is required for all development, including grading and additions to existing development that result in more than four “density unit equivalents” in compliance with Section 35.23.100 (MRD Zone Standards).”<sup>3</sup> Based on the MRD Zone Density Equivalent ratios<sup>4</sup>, four “density unit equivalents” equates to:

- **8 studio units (8 x .50 = 4)**
- **6.06 one-bedroom units (6.06 x .66 = 4)**

<sup>1</sup> California Government Code 65583.2 (h) & (i)

<sup>2</sup> Summary of New Form-Based Zone – Isla Vista Master Plan – Community Mixed Use (CM) Zone – Page 2

<sup>3</sup> Summary of New Form-Based Zone – Isla Vista Master Plan – Mixed Residential Design (MRD) Zone – Page 2

<sup>4</sup> Summary of New Form-Based Zone – Isla Vista Master Plan – Mixed Residential Design (MRD) Zone – Page 4

- 4 two-bedroom units (4 x 1.0 = 4)
- 2.6 three-bedroom units (2.6 x 1.5 = 4)

In the draft Appendix E1, Table 3 – Analysis of Realistic Development Capacity – IVMP Mixed Residential Design Sites (Attachment), the County of Santa Barbara estimates a realistic capacity of 406 residential units. Appendix E1 – Table 3 assigns a New Additional Capacity to each identified rezone site. Within the ten sites provided, the projected new additional capacity quantities range from 19 to 81 units per site. Given the estimated residential capacities of the sites, each Mixed Residential Design site project would be in excess of four “density unit equivalents,” thus requiring a Final Development Plan approval, pursuant to the processing requirements within the IVMP Mixed Residential Design (MRD) code. Again, a Development Plan approval is a discretionary action of local government and therefore does not constitute a “use-by-right” application.

**b. Inadequate Sites Designated Solely for Residential Use:**

We draw your attention once again to Section 65583.2 (h) of the California Government Code regarding the rezoning of properties sufficient to accommodate 100 percent of the need for low-income housing production not provided in the Housing Element Land Inventory, which states, “...At least 50 percent of the very low and low-income housing need shall be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted.”

Our understanding of the application of this section of law is that at least 50%, or 618 of the County’s required 1,235 units of additional lower income housing production, must be located on sites designated for residential use and for which nonresidential or mixed uses are not permitted. The County claims that 865 of the 1,235 units to meet the RHNA allocation for lower income housing production can be met by higher zoned sites in Isla Vista. However, 404 of these units would occur in the downtown area of Isla Vista on sites that are designated for nonresidential and mixed-use<sup>5</sup>. Another 252 of the units are proposed for sites in the MRD Area that have existing nonresidential uses; predominately churches, a hotel/fraternity and a parking lot (197 units on church sites, 17 units on a hotel site, and 38 units on a parking lot)<sup>6</sup>. This leaves only 209 units or 24% of the potential housing production in Isla Vista which would be located on sites that are currently designated residential and do not permit nonresidential or mixed use.

<sup>5</sup> See Attachment 3B: Isla Vista Housing Element Rezone Program, Downtown Sites Inventory 3/27/2008 to the County of Santa Barbara’s letter to HCD dated March 27, 2008.

<sup>6</sup> See Attachment 3B: Isla Vista Housing Element Rezone Program, Mixed Residential Design Sites Inventory 3/27/2008 to the County of Santa Barbara’s letter to HCD dated March 27, 2008.

Since the County has not completed its Refocused Rezone Program process, we cannot be sure that all of the sites it ultimately selects would be designated exclusively for residential development. Even if this proves to be the case, the remaining 370 units of needed housing production combined with the 209 units from Isla Vista total only 579 units or 47% of the potential housing designated for exclusively residential sites. The County's rezone program for Isla Vista therefore technically falls short of the statutory test of Section 65583.2 that mandates at least 50% of the lower income production be accommodated on sites designated for residential use and for which nonresidential uses or mixed uses are not permitted.

More importantly, the County's proposed reliance on the Isla Vista sites, which lack 'by right' zoning and whose development trends will produce primarily studios, shows that the County is not planning to meet the needs of the statutorily defined special housing needs populations for whom they are supposed to plan. Isla Vista studios will hardly meet the needs of large family households, female-headed households, the disabled or farmworkers, particularly in the South Coast housing market.<sup>7</sup>

## **2. Analyze and Evaluate the Realistic Capacity of Sites:**

### **a. Development Trends and Market Conditions:**

In the County of Santa Barbara's July 21, 2008 analysis letter, only two "in-process" projects, Paradise Ivy and Trigo Mixed-Use Project, were acknowledged as illustrating the development trends for the redevelopment efforts. The letter also states that, "the capacity for new residential development in Downtown Isla Vista is best demonstrated by replicating these projects onto other sites that exhibit similar land use conditions."<sup>8</sup>

The Paradise Ivy project includes the construction of a 27,850 square foot mixed-use building, including commercial space on the first floor and residential units on the second and third floors. Paradise Ivy proposes 24 residential units, of which 100% are studio units, ranging from 425 to 760 square feet.

The Trigo Mixed-Use Project includes the construction of a 30,000 square foot mixed-use building including commercial space on the first floor and residential units on the above floors. Trigo Mixed-Use proposes 44 residential units, of which 40 units, or 91%, are studio units of approximately 500 square feet; the remaining four units are two-bedroom units of approximately 1,000 square feet, which account for only 9% of the residential project.

<sup>7</sup> For example, large households require larger rental units. However, the County's Housing Element states that the South Coast rental market has the smallest percentage (23.1%) of three or more bedroom rental units, much lower than the number of large household renters (39.1%).

<sup>8</sup> County of Santa Barbara Letter, July 21, 2008, Page 9 of Letter (actual page number 134)

Paradise Ivy and Trigo Mixed-Use together have been considered the “flagship” projects, to be replicated throughout the identified redevelopment sites. Together, the residential unit mix of these example projects contains 64 studio units, no single or three-bedroom units, and 4 two-bedroom units.

If these illustrative ratios were applied to the remaining 336 units of residential capacity identified for the IVMP Downtown sites, the community would receive approximately 380 studio units out of the total 404 residential units.

These “development trends” are clearly not providing multi-family housing opportunities within the community. By the County’s own Housing Element, 79% of the County households would require housing greater in size than a studio. Similarly, when the University of California Santa Barbara (UCSB), the closest major employer to the Isla Vista area, performed a Faculty and Staff Housing survey in 2006, only 7% of the respondents indicated that they would consider a one-bedroom or studio home, while 93% said that they would only consider something larger.<sup>9</sup> The UCSB Faculty and Staff Housing survey also indicated that the smallest size employees would consider for their next housing purchase is average 1,470 square feet(9). We have a strong belief that the studio housing will be mostly occupied by students in the area, not families<sup>10</sup>.

Other development trends provided by the County only included anecdotal statements of developer interest in redeveloping properties. To our disappointment, the County’s analysis did not include an analysis of the viability of development on the remaining sites or affirmation of lot consolidation.

Although neither a full market conditions analysis nor financial pro forma data was provided by the County, as suggested in the June 16<sup>th</sup> HCD letter, the Paradise Ivy and Trigo Mixed-Use Project inherently provide insight into the feasibility of redevelopment in the subject area. Given the quantity of small studio units, these project examples suggest that the landowners and developers must maximize unit count for a reasonable return on investment. The market forces

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<sup>9</sup> UCSB Faculty and Staff Housing Survey – 2006, Page 13

<sup>10</sup> In the Isla Vista Census tract, 77% of the households are nonfamily while only 23% are family households, compared to 57% families in the South Coast region. This reflects the large student population of 13,000 out of 20,000 residents or 65% of the total population for the community (2000 U.S. Census). The median age in Isla Vista was 21 years compared to 40 years for the South Coast and 33 years for the entire county (2000 U.S. Census). Clearly Isla Vista is a student-oriented community. In fact, the population of Isla Vista is composed primarily of affluent students, who would rent studio apartments, and lower income families, who would not since they require larger units. While providing small studios and one-bedroom units for student housing may be considered a type of special needs population, it does not meet the needs of lower income families, single-parents, the disabled and others with special needs who cannot find affordable housing in the South Coast market.

related to redevelopment of sites in Isla Vista would most likely result in higher cost studio rental units for students rather than affordable family units.

**b. Lack of Sites for Larger Scale Affordable Projects:**

In particular, the County has not demonstrated the ability to consolidate lots in Isla Vista to create properties with the economy of scale needed to produce multi-family affordable housing projects of 50-80 units, which HCD has stated is the size typically required to compete for federal and state financial sources. There are only two properties listed by the County with this capacity—one with a potential of 52 units and the other with 81 units—and both of these sites have existing uses. The proposed 81-unit project site is located on a property with an existing church and the 52-unit site has existing businesses. Instead, as stated earlier, the preponderance of small lots and the economics of development would result in small-scale high-density projects comprised of studio units. The small lots in IV cannot be feasibly developed for larger unit affordable projects that would serve lower-income family households.

**c. Impediments to Development on Nonvacant Sites:**

We also note that the County still has not provided an explanation of the extent to which existing uses on non-vacant sites may be an impediment to additional residential development. This is of particular concern for the five existing church sites in the MRD zone, which alone represent a total of 197 units of the County's projected new residential development in the MRD zones. For example, the County has provided no information on the existing building coverage of the five church lots, whether the sites have excess space for the proposed housing production or whether significant housing production on the sites could be achieved only through demolition of the church buildings. Demolition of church structures may be highly unlikely; e.g. we are aware that Site 17, where 21 housing units are proposed, contains a newer church that was constructed in 2001 at a cost of \$3.3 million. We reiterate that except for anecdotal evidence provided for one church site in the MRD zone, the County presents no analysis or surveys of the landowners or other data to support the feasibility of redeveloping non-vacant properties within the planning cycle.

**d. Lack of Variety of Housing Types:**

The IVMP fails to meet the test of Section 65583.2 of the California Government Code, which requires the jurisdiction to demonstrate that a variety of housing types can be produced for lower income households. The majority of housing that could be developed under the IVMP, which represents 865 units or 70% of the County's total 1,235 units of unmet need for lower income housing production, would be studio units. This housing type is suitable for the large student population in Isla Vista or single person households, but it is an inappropriate housing type for

families, who constitute the vast majority of lower income households requiring affordable housing (see statistics from the County's Housing Element, below<sup>11</sup>).

### **3. Non-Timeliness:**

We reiterate our concern expressed in our May 27, 2008 letter to HCD that the County of Santa Barbara has not demonstrated that the 865 units proposed by the adoption of the Isla Vista Master Plan to meet required lower income housing production can be reasonably expected to be developed prior to the end of the 2001-2009 RHNA planning cycle, per the requirement of Section 65583.2 (a) of the California Government Code.

In its July 21, 2008 letter to HCD, the County states that “...a host of projects are already in the permit pipeline and in the conceptual phases of review by the Planning Department.” However, the County has still not provided any data to substantiate this claim. [The County should minimally provide a list of these projects with the number, type and size of the units proposed, the percentage of affordable units and the status of the project within the planning process.] Moreover, the County's statement directly contradicts the housing production timeline of 20-30 years articulated in the adopted Isla Vista Master Plan.

Secondly, Isla Vista falls within the Coastal Zone, and development within this zone requires the consent of the Coastal Commission. The Coastal Commission has not yet approved the IVMP. We understand that the Coastal Commission has some concerns with the IVMP, in particular the parking regulations. Resolution of the IVMP planning issues between the Coastal Commission and County of Santa Barbara may take considerable time, further impacting the reasonableness of redevelopment of the IV sites during the current RHNA planning cycle. In addition, we point out that there can be no development “by right” on sites in Isla Vista, even if the County were to change its zoning ordinance, unless and until the Coastal Commission approves the Isla Vista Master Plan.

### **4. Conflict with Statutory Goal of Balanced Distribution:**

We draw attention once again to the fact that the County's plan to locate 865 units of housing in Isla Vista conflicts with the statutory goal of Section 65584 (a) of the California Government Code, which states, “[T]he distribution will seek to avoid impact of localities with a relatively

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<sup>11</sup> The County's Housing Element indicates that only 21% of all county households are comprised of one person. 51% of county households are comprised of families of 2-3 persons while 28% are comprised of families of 4 to 6 or more persons. Therefore 79% of households would require housing greater in size than a studio, with a majority needing 2-3 bedroom units.

higher proportion of lower income households". We have previously presented evidence to HCD demonstrating that Isla Vista is the most densely populated area with the highest proportion of lower income household and percentage of poverty in Santa Barbara County<sup>12</sup>. By ignoring other viable sites in the South Coast region and designating Isla Vista as the sole location for meeting the required additional RHNA capacity for lower income housing production in South County, the County aggravates existing impaction in this community and creates a disparate impact on indigent and minority households.

The County of Santa Barbara still has not complied with HCD's mandated directive of to provide a realistic assessment of the capacity, suitability and availability of sites for lower income housing production within the IVMP and cannot present a factually definitive number of units that can be allocated to Isla Vista. Moreover, not only has the County been unable to justify the potential capacity for housing production for lower income households in Isla Vista, they have also made it clear that there would be no diversification of housing types. To achieve the production numbers they claim for Isla Vista, the housing would virtually all be studios. Therefore the County blatantly ignores the critical affordable housing needs of large households, female-head of households, the disabled, farmworkers and others with special needs, particularly in the high cost South Coast region.

While we have again refuted the County's claim to adequately rezone sites to meet its RHNA housing production of 1,235 units, we would like to raise the issue of the County of Santa Barbara's Isla Vista strategy in a broader public policy context. The County has delayed appropriate rezoning of land for the production of housing for lower income households for over 7 years. At the last minute, when pressured by affordable housing opponents, anti-growth activists and a neighborhood 'nimby' group, it unilaterally abandoned good faith efforts to rezone larger vacant sites in the South Coast, without adequate public notice or input. Instead, the County opted to place the lion's share of the 1,235 units of lower income housing production in Isla Vista in a political maneuver designed to placate a powerful anti-housing lobby. By placing the bulk of its RHNA production in Isla Vista—the most densely populated and built-out community in the entire county—the County is actually ensuring that the needed RHNA housing production will not occur. In adopting the Isla Vista strategy, the County makes a cynical pretense of meeting its responsibilities under State Housing Element Law.

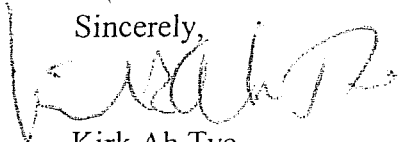
The County of Santa Barbara is still evading its mandated duty to provide adequate sites for the production of housing for lower income households. The Isla Vista rezone scheme is significantly noncompliant, disingenuous and demonstrates an unconcealed disregard for the requirements of State Housing Element Law. The County of Santa Barbara's housing element

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<sup>12</sup> Please see letter of May 27, 2008 from CRLA to HUD, representing a coalition of affordable housing proponents.



must, accordingly, be decertified.

Sincerely,  
  
Kirk Ah Tye  
Directing Attorney

Attachments

## ATTACHMENTS AND FOOTNOTE REFERENCES


California Government Code 65583.2.

(h) The program required by subparagraph (A) of paragraph (1) of subdivision (c) of Section 65583 shall accommodate 100 percent of the need for housing for very low and low-income households allocated pursuant to Section 65584 for which site capacity has not been identified in the inventory of sites pursuant to paragraph (3) of subdivision (a) on sites that shall be zoned to permit owner-occupied and rental multifamily residential use by right during the planning period. These sites shall be zoned with minimum density and development standards that permit at least 16 units per site at a density of at least 16 units per acre in jurisdictions described in clause (i) of subparagraph (B) of paragraph (3) of subdivision (c) and at least 20 units per acre in jurisdictions described in clauses (iii) and (iv) of subparagraph (B) of paragraph (3) of subdivision (c). At least 50 percent of the very low and low-income housing need shall be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted.

(i) For purposes of this section and Section 65583, the phrase "use by right" shall mean that the local government's review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code. Any subdivision of the sites shall be subject to all laws, including, but not limited to, the local government ordinance implementing the Subdivision Map Act. A local ordinance may provide that "use by right" does not exempt the use from design review. However, that design review shall not constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code. Use by right for all rental multifamily residential housing shall be provided in accordance with subdivision (f) of Section 65589.5.

## Community Mixed Use Zone (CM) Summary

### Processing

1. All permits for development including grading shall be issued in conformance with LUDC Sec. 35.82.050 (Coastal Development Permits).
-  2. Prior to the issuance of any coastal development permit for buildings and structures which total 7,000 or more square feet in gross floor area or where on-site buildings and structures and outdoor areas designated for sales or storage total 20,000 square feet in size, a Development Plan shall be approved as provided in LUDC Sec. 35.82.080 (Development Plans).
3. Prior to the issuance of any coastal development permit for buildings or structures, site plans and elevations of buildings and structures shall be approved by the Board of Architectural Review, as provided in LUCD Sec. 35.82.070 (Design Review).

### Allowed Uses (LUDC Sec. 35.24.030)

In addition to those uses listed below, other retail or service use the Planning Commission finds essential to daily (frequent) needs of residents in the surrounding area and essential to the shopping needs of the community may be allowed.

**Mixed Residential Design Zone (MRD) Summary**

**Processing**

1. All permits for development including grading shall be issued in conformance with LUDC Sec. 35.82.050 (Coastal Development Permits).
- \* 2. Final Development Plan approval is required for all development, including grading and additions to existing development, that result in more than four "density unit equivalents" in compliance with Section 35.23.100 (MRD Zone Standards).
3. Prior to approval of any Coastal Development Permit (Section 35.82.050) for structures, the site plans and elevations of structures shall be approved or conditionally approved by the Board of Architectural Review, in compliance with Section 35.82.060 (Design Review).

**Allowed Uses (LUDC Sec. 35.23.030)**

Table 1: MRD Zone Allowed Uses

MRD Zone Uses	Allowed CDP/DP	Minor CUP	CUP
Residential accessory use or structure	√		
Home occupation	√		
Cultivated agriculture, orchard, vineyard		√	
Child care center, Non-residential		√	
Child care center, Non-residential, accessory	√		
Child care center, Residential		√	
Park, playground - Public	√		
Private residential recreation facility	√		
Dwelling, one family	√		
Dwelling, two family	√		
Dwelling, multiple	√		
Single residential occupancy facilities (SROs)	√		
Greenhouse - commercial or noncommercial, 300 sf or less		√	
Community center			√
Emergency shelter			√
Mobile home park			√
Special care home, 14 or fewer clients	√		
Special care home, 15 or more clients		√	
Meeting facility, public or private			√
Meeting facility, religious			√
Meeting room accessory to organizational house			√
School			√
Parking facility, commercial, for residential use		√	
Organizational house (sorority, monastery, etc.)			√

**Mixed Residential Design Zone (MRD) Summary**

**\* Variable Density/Density Equivalents (LUDC Sec. 35.23.100 B)**

In the MRD zone, units smaller than two bedrooms will be counted as less than a full unit and units larger than two bedrooms will count as more than a full unit when calculating allowable density. The following density equivalents shall be used in calculating the number of dwelling units allowed on a lot for each dwelling unit type shown in Table 3 (MRD Zone Density Equivalents) below.

Table 3:MRD Zone Density Equivalents.

Unit Size	Density Equivalent Units
Studio	0.50
One bedroom	0.66
Two bedroom	1.0
Three bedroom	1.5
Each additional bedroom	+ 0.5

**Unit Sizes (LUDC Sec. 35.23.100 C)**

Dwelling units in the MRD zone shall not exceed the following maximum unit sizes for each dwelling unit type shown in Table 4 (MRD Zone Unit Size) below measured in square feet of net floor area.

Table 4: MRD Zone Unit Size

Dwelling Unit Type	Maximum Unit Size (Sq Ft)
Studio	500
One bedroom	700
Two bedroom	1000
Three bedroom	1300
Each additional bedroom	+ 300

**Setbacks (LUDC Sec. 35.23.100 D)**

1. **Front.** All lots shall have a Build To Line. Please see Appendix 1 of this summary for an explanation of the Build To Line (BTL).
  - a. MRD-35 and MRD-30. Lots zoned MRD-35 or MRD-30 shall provide a front setback of thirty five (35) feet from the street centerline.
  - b. MRD-28 and MRD-25. Lots zoned MRD-28 or MRD-25 shall provide a front setback of forty two (42) feet from the street centerline.
2. **Side.** Side setbacks shall be a minimum of five (5) feet.
3. **Rear.** See LUDC Sec. 35.23.100.E.5.

# DRAFT Appendix E1, Table 2



## Analysis of Realistic Development Capacity IVMP Downtown Sites

Site and APN	Prior Zoning	New IVMP Zoning (Units per Acre)	Acres	Existing Coverage Ratio (1)	Existing Units	Realistic Development Capacity with IVMP Incentives	Existing Use
<b>Site 1 (Paradise Ivy)</b>							
075-112-016	C-2	CM-40	0.207	0.23	0	25	Retail
<b>Total</b>			<b>0.207</b>	<b>0.23</b>	<b>0</b>	<b>25</b>	
<b>Site 2</b>							
075-111-006	C-2	CM-40	0.126	0.00	0	15	Vacant
075-111-014	C-2	CM-40	0.278	0.00	0	33	Vacant
<b>Total</b>			<b>0.404</b>	<b>0.00</b>	<b>0</b>	<b>48</b>	
<b>Site 3</b>							
075-121-004	C-2	CM-40	0.23	0.00	0	28	Vacant
<b>Total</b>			<b>0.23</b>	<b>0.00</b>	<b>0</b>	<b>28</b>	
<b>Site 4</b>							
075-122-011	C-2	CM-40	0.196	0.00	0	24	Vacant
<b>Total</b>			<b>0.196</b>	<b>0.00</b>	<b>0</b>	<b>24</b>	
<b>Site 5</b>							
075-173-023	SR-H 20	MRD 28	0.12	0.00	0	14	Vacant
075-173-024	C-2	CM-40	0.14	0.30	0	17	Restaurant
<b>Total</b>			<b>0.258</b>	<b>0.15</b>	<b>0</b>	<b>31</b>	
<b>Site 6</b>							
075-161-014	C-2	CM-40	0.227	0.00	0	27	Parking Lot
<b>Total</b>			<b>0.227</b>	<b>0.00</b>	<b>0</b>	<b>27</b>	
<b>Site 7</b>							
075-161-003	C-2	CM-40	0.436	0.28	0	52	Misc. Businesses
<b>Total</b>			<b>0.436</b>	<b>0.28</b>	<b>0</b>	<b>52</b>	
<b>Site 8</b>							
075-112-014	C-2	CM-40	0.124	0.52	0	15	Restaurant
075-112-015	C-2	CM-40	0.124	0.00	0	15	Parking Lot
<b>Total</b>			<b>0.248</b>	<b>0.26</b>	<b>0</b>	<b>30</b>	
<b>Site 9</b>							
075-172-002	C-2	CM-40	0.199	0.20	0	24	Warehouse
<b>Total</b>			<b>0.199</b>	<b>0.20</b>	<b>0</b>	<b>24</b>	
<b>Site 10</b>							
075-173-026	C-2	CM-40	0.265	0.07	0	32	Auto
075-173-003	C-2	CM-40	0.115	0.01	0	14	Auto
<b>Total</b>			<b>0.38</b>	<b>0.04</b>	<b>0</b>	<b>46</b>	
<b>Site 11</b>							
075-121-007	C-2	CM-40	0.209	0.29	0	25	Retail
<b>Total</b>			<b>0.209</b>	<b>0.29</b>	<b>0</b>	<b>25</b>	
<b>Site 12</b>							
075-122-014	C-2	CM-40	0.167	0.17	0	20	Restaurant
<b>Total</b>			<b>0.167</b>	<b>0.17</b>	<b>0</b>	<b>20</b>	
<b>Site 13</b>							
075-122-010	C-2	CM-40	0.207	0.16	0	25	Auto
<b>Total</b>			<b>0.207</b>	<b>0.16</b>	<b>0</b>	<b>25</b>	
<b>Total</b>			<b>3.37</b>	<b>0</b>	<b>0</b>	<b>404</b>	

### Notes on Downtown Capacity Analysis

1. Coverage ratios are the existing commercial square footage as a percentage of square footage of the entire lot
2. Lower coverage ratios generally indicate higher incentive to redevelop
3. All consolidated parcels are under common ownership (i.e., Sites 2, 5, 8, and 10)
4. Projects are being considered that consolidate more than two lots with higher coverage ratios than the ones reported here

# DRAFT Appendix E1, Table 3

## Analysis of Realistic Development Capacity IVMP Mixed Residential Design Sites

Site and APN	Prior Zoning (Units per Acre)	New IVMP Zoning (Units Per Acre)	Acres	Existing Units	New Additional Capacity	Existing Use
<b>Consolidation: Vacant and Underutilized Parcels</b>						
<b>Site 14</b>						
075-020-005	SR-H 20	MRD 30	0.821	7	17	Hotel/Fraternity
075-020-035	SR-H-20	MRD 35	1.318	0	46	Vacant (IVMP Affordable Housing Site)
<b>Total</b>			<b>2.139</b>	<b>7</b>	<b>63</b>	
<b>Site 15</b>						
075-020-036	SR-H 20	MRD 30	0.471	1	13	Single Family Residence
075-020-007	SR-H-20	MRD 35	0.818	0	28	Vacant (IVMP Affordable Housing Site)
<b>Total</b>			<b>1.289</b>	<b>1</b>	<b>41</b>	
<b>Consolidation: Underutilized Parcels Only</b>						
<b>Site 16</b>						
075-064-001	SR-H-20	MRD 35	0.493	10	7	Apartments
075-064-004	SR-H 20	MRD 30	0.494	2	12	Apartments
<b>Total</b>			<b>0.987</b>	<b>12</b>	<b>19</b>	
<b>Site 17</b>						
075-033-002	SR-H 20	MRD 30	0.716	0	21	Church
075-033-003	SR-H 20	MRD 30	1.276	0	38	Church
<b>Total</b>			<b>1.992</b>	<b>0</b>	<b>60</b>	
<b>Site 18</b>						
075-092-008	SR-M 18	MRD 25	0.437	2	8	Apartments
075-092-009	SR-M 18	MRD 25	0.584	1	13	Single Family Residence
<b>Total</b>			<b>1.021</b>	<b>3</b>	<b>21</b>	
<b>Underutilized Single Parcels</b>						
<b>Site 19</b>						
075-101-022	SR-H-20	MRD 35	2.33	0	81	Church
<b>Total</b>			<b>2.33</b>	<b>0</b>	<b>81</b>	
<b>Site 20</b>						
075-041-012	SR-H-20	MRD 35	1.105	0	38	Parking Lot
<b>Total</b>			<b>1.105</b>	<b>0</b>	<b>38</b>	
<b>Site 21</b>						
075-036-001	SR-H 20	MRD 30	0.925	0	27	Church
<b>Total</b>			<b>0.925</b>	<b>0</b>	<b>27</b>	
<b>Site 22</b>						
075-052-007	SR-H 20	MRD 30	0.965	2	26	Apartments
<b>Total</b>			<b>0.965</b>	<b>2</b>	<b>26</b>	
<b>Site 23</b>						
075-072-003	SR-H 20	MRD 30	1.025	0	30	Church
<b>Total</b>			<b>1.025</b>	<b>0</b>	<b>30</b>	
<b>Total Isla Vista MRD Area Rezone Capacity</b>			<b>13.78</b>	<b>25</b>	<b>406</b>	



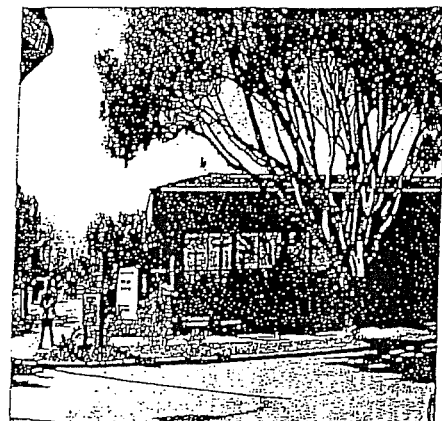
## Santa Barbara County Housing Element

- Use the Built Right program to gain additional residential density
- Consolidate two adjoining parcels.
- Build 46 residential units, including studios and two bedroom condos, using Variable Density, Built Right, and State Density Bonus Law programs.
- Provide 4,600 square feet of commercial uses.
- Obtain LEED certification for energy efficient building design.

Given what is happening on the ground, the capacity for new residential development in Downtown Isla Vista is best demonstrated by replicating these projects onto other sites that exhibit similar land use conditions. Four common characteristics have been used to identify feasible infill redevelopment sites. These include lot location, existing building coverage ratios (structure square footage as a % of total lot square footage), underlying commercial and land values, and existing uses. Using these five characteristics, thirteen sites have been identified that demonstrate a strong incentive to redevelop. Development patterns, unit densities, and overall site characteristics are derived from the Paradise Ivy and the Trigo Loop projects, as well as from discussions with landowners who have indicated their desire to pursue redevelopment projects using the programs describe in the IVMP.<sup>5</sup>

Figure 2: Paradise Ivy - before

Several adjoining parcels in the Downtown area are under common ownership, and for purposes of this capacity analysis, those are the only parcels that are anticipated to consolidate. There are four of these "common ownership" sites in the Downtown area.<sup>6</sup> In addition, seven other individual Downtown parcels are either vacant or share common characteristics with the Paradise Ivy and Trigo Loop sites. When these seven sites are combined with the common ownership sites, and the Paradise Ivy and the Trigo Loop sites, there is capacity for 404 new units in Downtown Isla Vista. A detailed map and sites description is included in Appendix E1, Figure 2 and Table 2.



It is likely that other parcels in the Downtown area have significant build-out potential; however, the County has taken a conservative approach by only counting the capacity made possible from the vacant parcels and sites that exhibit the highest reasonable feasibility of redeveloping during the planning period.

Figure 3: Paradise Ivy - after

### *Mixed Residential Design Sites*

The rest of Isla Vista, or the Mixed Residential Design (MRD) Area, is characterized primarily by existing residential uses that cater to working households and students. One of the primary goals of the IVMP is to increase affordable housing opportunities for long-term working households,<sup>7</sup> and ten sites have been identified



<sup>5</sup> From multiple personal communications with the RDA

<sup>6</sup> See Appendix E1, Figure 2, Sites 2, 5, 8, and 10

<sup>7</sup> See IVMP Housing Goal and Housing Policy 4, pages 4-38 and 4-39 of the IVMP.

Among those who plan to purchase a new or different home, 69% say they are most likely to purchase a single-family home, and 22% will most likely purchase a condo or townhouse. Respondents also indicated all types of housing they would consider. While most (93%) would consider a single-family house, 61% would consider purchasing a condo or townhouse, and 37% would possibly purchase a duplex, triplex, or fourplex.

Among respondents planning to purchase housing (n=434), a separate analysis not shown in Table 4 reveals that approximately 25% would only consider purchasing a single-family home.

	<u>Most Likely</u>	<u>Any Considered*</u>
Single-Family House	69%	93%
Condo/Townhouse	22%	61%
Duplex/Triplex/Fourplex	3%	37%
Mobile Home	3%	3%
Loft-style Apartment	<1%	14%
Other	3%	13%

\*Multiple responses allowed

Employees planning to purchase a home would consider a range of housing sizes.



- When asked to indicate any number of bedrooms they would consider, 7% would consider a 1-bedroom or studio home, and 37% would consider a 2-bedroom home. However, the majority (64%) of employees indicate they are considering a 3-bedroom home, and 30% would consider more than 3 bedrooms.
- Similarly, 9% would consider only 1 bathroom in their next home, 27% selected 1½ bathrooms, 68% would consider a 2-bathroom home, and 35% would consider purchasing a home with 3 or more bathrooms.
- The smallest size in terms of square footage employees would consider for their next housing purchase is 1,470, on average.