

de la Guerra, Sheila

Public Comment



#9

From: Citizens Planning Association <citizensplanningsb@gmail.com>
Sent: Monday, April 3, 2023 2:43 PM
To: sbcob
Subject: CPA letter re Housing Element Update item on the April 4 agenda
Attachments: CPA HEU final April.docx

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Dear COB, Please find attached the CPA letter. Please respond with a quick e-mail so I know you received our letter in a timely fashion and were able to forward it to the individual BOS members and to include it in the online packet. Thanks.
Marell Brooks

Citizens Planning Association
916 Anacapa
Santa Barbara, CA 93101
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Citizens Planning Association

916 Anacapa Street

Santa Barbara, CA 93101

April 3, 2023

TO: Santa Barbara County Board of Supervisors

FROM: Citizens Planning Association

Re: Input regarding Housing Element additional sites, etc.

Dear Supervisors:

Citizens Planning Association, a volunteer organization created 63 years ago, promotes sound planning and sustainable communities throughout Santa Barbara County. Thank you for having this item on today's agenda.

During the HE Update process, CPA has submitted more than a half dozen public comments, starting with the SBCAG RHNA numbers distribution in summer 2022. We have attended every workshop during this process. We now read that staff received 400 comments which have been condensed to a list of 12 bullet points. Hopefully, before the final document is submitted, the Board will have time to review the suggestions and provide some feedback to the letters submitted. Perhaps that will happen today.

CPA looks forward to having the document come before your own Planning Commission, an omission so far in the process. Also, we encourage the Board to make sure there is adequate staffing in place before the next steps begin. We realize that the Planning Department is very short-handed right now and this process, to be done thoroughly, needs a full staff in place.

CPA appreciates the recent efforts to identify sites that were not previously included, e.g. UCSB projects, Montecito parking lots, County owned properties etc. However, we again stress the absence of, and dire need for, genuine community engagement, especially for those neighborhoods poised to have hundreds, or even thousands, of units added to their region.

Our major objection, besides the lack of community involvement in this process, is the laser focus on using agricultural lands. Even though you have now included some "alternative" sites, found only after a strong outcry by a surprised public, the document sent to the State still includes the agricultural sites. According to Pg D-35, Table D-18, the County is still proposing rezone of Ag lands along Hollister in a 1.5 mile radius, adding 4,191 units to this small, densely populated section of the EGV. The rezone of nearby County properties at 50 units an acre adds hundreds more units. *Calculating at an average of 2.5 persons, these rezones would potentially increase the population in this area by over 10,000 persons* This is, effectively, the creation of a new town in an already resource-constrained area. (See the graphic/comment on page 3 of our letter).

CPA continues to believe the County staff and officials should begin open communication and discussions and workshops with the impacted neighborhoods. In Appendix A, the table on Housing Element Outreach activities includes a December 2022 meeting where staff “facilitated a City of Carpinteria resident stakeholder meeting to discuss proposed rezones along the Carpinteria City Boundary” with “residents of Carpinteria and surrounding unincorporated areas”. No comparable “stakeholder meeting” was convened in the Eastern Goleta Valley. When CPA proposed this idea, our suggestion was dismissed. If the HE will increase populations in some areas by 20%-50%, public discussions would be helpful.

CPA is disappointed that the draft has been sent to the State showing all the proposed Ag sites. We thought they could be removed before submitting the HE draft to the State. We are hearing that with all these additional sites, the board can now make choices. The HEU guidelines from the State actually stated that Ag lands should be the last resort. For some reason, Santa Barbara County went in the opposite direction: staff used Ag sites very early in the process, they are still in the document, and now the Board will have to deliberate if they want to save these lands from development.

CPA feels it is incumbent upon County staff and elected officials to openly discuss and consider the impacts cumulatively and to not dismiss the conversion of Ag land that, five years ago, was protected in the EGV Community Plan. While the EGV Community plan policies did discuss use of County land for future housing needs, such policy did not contemplate the rezone of all nearby Ag lands along the Hollister Corridor. But now, here we are, all that valuable Ag land will be up for ‘grabs’ during the final deliberations.

County staff have repeatedly explained the SBCAG’s decision to allot 73% of the State issued RHNA numbers to the South County was because the North County had absorbed most RHNA numbers in the past. This is not accurate. The 2015 EGV Community Plan rezones were a policy of the last HEU update and as noted in Appendix E of Page E-15, “the EGVACP went into effect in the inland areas in November 2015 and the Coastal Zone in December 2017. It rezoned sites to allow an additional 2375 primary residential units over five sites and a MU corridor. These rezones promote affordability by design, including potential live/work units, multi family units, and MU development.”

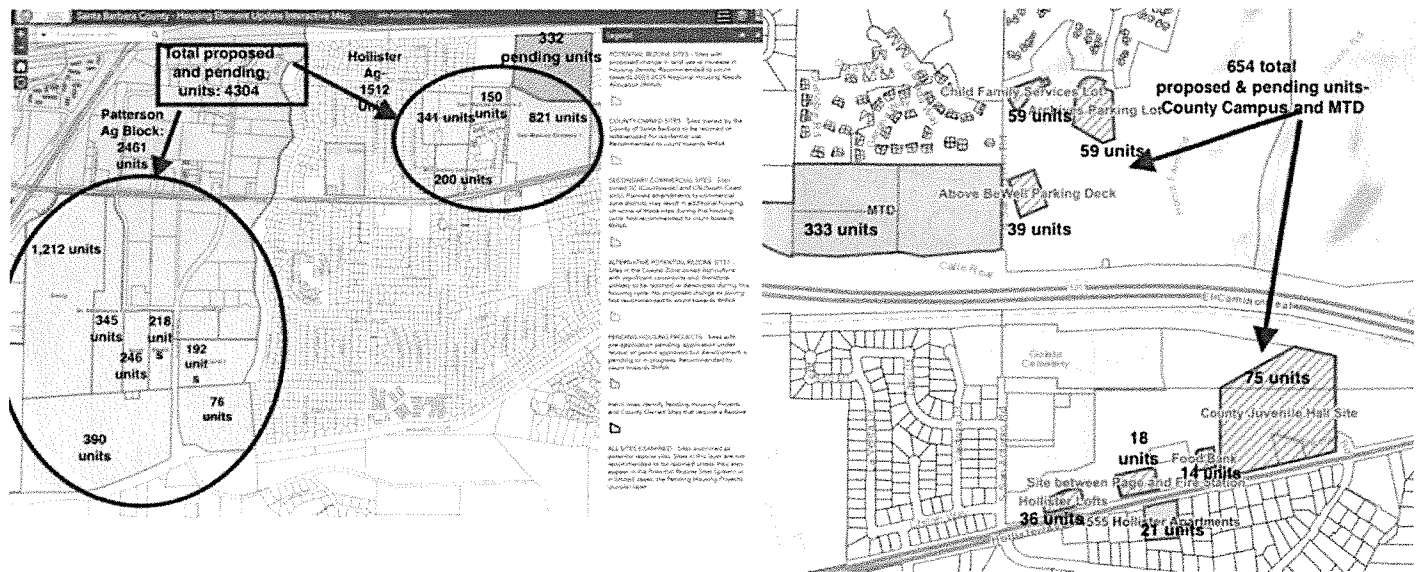
CPA is still concerned that there is no consideration of the policies in community plans that discuss specific Ag Conversion policies, or resource protection efforts, such as the expanded ESH map action that arose out of the EGV plan update. An early HEU guideline suggested the sites be selected in alignment of ‘existing policies’. We interpreted that as the existing community plans. Will these policies be considered when the rezones are decided upon by the BOS? Again, you will need a full staff to prepare this information.

Lastly, the proposed programs did not include any effort to monitor and enforce Short Term Rental conversions. In fact, the only reference to STRs was to ADD the ability to have STRS in the Coastal zone. These conversions impact housing stock in already constrained areas throughout the County.

In closing, CPA has done its best to stay abreast of this whole process and to communicate our concerns along the way. It has not been easy. We hope that when the State returns the Santa Barbara County draft HE, staff is at an adequate level to handle this enormous task foisted upon you by the State. We look forward to the Board acting forcefully to save our Ag parcels, to not create lasting, irreparable impacts on existing communities, and to make selections so that Santa Barbara County continues to be a vibrant area, one that is well-planned, more affordable for our existing workers, and sustainable.

Marell Brooks, President

Citizens Planning Association



Utilizing the County's interactive map <https://sbcopad.maps.arcgis.com/apps/webappviewer/index.html?id=9375e0705e864eada0ff535c23ba99ac> we have calculated the proposed and pending units along the Hollister Corridor, encompassing the 2.5 mile stretch between Modoc and Hwy 217.

It appears that the County's Draft Housing Element, submitted to State HCD on March 31st, proposes 4,958 new units of housing- most of it "multifamily" along this corridor; utilizing conservative calculation of 2.5 persons per unit, ***this plan proposes over 12,000 added persons to this already constrained area.*** This calculation ***does not*** include the added units to the Goleta and EGV planning areas along Cathedral Oaks, between Storke and Hwy 154.

We implore the Board of Supervisors to direct staff to initiate outreach and engagement to residents and stakeholders, and initiate adequate environmental review of the impacts of the creation of a “new town” within an existing community plan area.