



November 6, 2023

Mayor Rowse and City Council Members  
City of Santa Barbara  
City Hall  
735 Anacapa Street  
Santa Barbara, CA 93101

Submitted via Email

RE: Amendment to Average Unit Size Density Program Expiration Date

Dear Mayor Rowse and Councilmembers,

The League of Women Voters of Santa Barbara (LWVSB) thank you for this opportunity to weigh in on the expiration date for the City's Average Unit Density (AUD) Program. As you know, the Planning Commission reviewed this issue on October 12 and decided to recommend you make the program permanent by eliminating the sunset provision. Similarly, the Ordinance Committee also voted 2 to 1 to recommend the Council make the program permanent.

Unlike the Planning Commission, the City Council does not have the benefit of reviewing the detailed, 106-page [Progress Report on the AUD program](#), which includes substantial data and analysis of the program over the last ten years. While we understand there are time constraints, we do not believe it is sound public policy to ask the Council to make a decision about whether or not to permanently extend the program without the City Council having had the benefit of discussing the findings and merits of this exhaustive evaluation of the AUD program first.

Furthermore, Council Agenda Report and the AUD Progress Report inadequately address issues that we have mentioned during prior public comments on the AUD program, along with other stakeholder groups, and with which some, if not all, Council members have concurred. These include but are not limited to the following:

1. The Community Benefit designation and its attendant benefits, such as height increases, should not be available for market rate housing projects with minimal affordable housing.
2. 100% affordable projects should pay no or reduced processing fees.
3. 100% affordable housing projects should be encouraged through increased flexibility on building codes and enhanced permit streamlining not available for market rate housing projects.
4. The AUD Program has made land more expensive for nonprofits and the Housing

Authority who must compete with the for-profit sector to build 100% deed-restricted affordable housing projects.

We, therefore, recommend that the AUD program not be made permanent but instead be extended to a date in the near future. In the interim, City staff can work on high-priority issues and amendments to the AUD program like those outlined above. The Council can then choose to enact those amendments concurrently with making the AUD program permanent.

Since we see no analysis in the Council Agenda Report or its attachments about which or how many pending AUD projects are at risk of being pulled from consideration if the City Council decided on a different timeline than the staff's recommendation of July 1, 2027 (page 4), we believe a request for such an analysis is important and would guide the Council in deciding how long to extend the program.

Sincerely,



Vicki Allen, VP LWVSB  
Leadership Team



Dianne Black, VP LWVSB  
Leadership Team