



March 29, 2024

Santa Barbara County Planning Commission
123 E. Anapamu Street
Santa Barbara, CA 93101

RE: Planning Commission Hearing on Housing Element Rezone Sites April 1, 2024

Chair Martinez and Members of the Commission,

The League of Women Voters of Santa Barbara (League) appreciates the opportunity to provide comments to your Planning Commission regarding the proposed rezones which will complete the County's Housing Element adoption process for the sixth cycle. While we have concerns about the Balancing Act Tool model, as described below, we want to be clear: we urge the Planning Commission to make a recommendation to the Board of Supervisors to adopt rezones that will satisfy the State Housing and Community Development Department and keep the County in compliance with State requirements. To do otherwise would subject the County again to a period of Builder's Remedy projects.

The League is not taking a position on which privately owned sites the County should rezone, but does offer the following principles that should be considered by your Commission and ultimately the Board of Supervisors in your rezoning decision:

1. **Rezone all the County-owned sites.** These sites should be used exclusively for affordable housing. These properties are held by the County in trust to the public and should serve the public good. Sites 15 and 16 include an assumption of 30 above moderate units and 12 above moderate units respectively. The for-profit housing market will ensure more than enough market rate housing. The County should focus on providing affordable deed restricted housing.
2. **Rezone projects that offer the greatest promise of affordability,** including:
 - a. Those that propose partnering with a non-profit housing developer or Housing Authority.
 - b. Those that propose partnering with employers, either directly or in conjunction with the Chamber of Commerce.
3. **Rezone projects that offer livability and options in their proposed developments,** including:
 - a. Those that provide a mix of unit sizes, including units suitable for families.
 - b. Those that provide for sale units and not just rental units.

- c. Those that provide amenities, such as public parks, trails and recreational facilities, and childcare facilities.
4. **Consider geographically dispersing sites** so that one area of our community does not bear the brunt of all the impacts that accompany new housing developments.

The League continues to be concerned about the assumptions for affordability included in the Balancing Act Tool model. For most of the sites, units are assumed to be provided in the following income levels: 50% lower, 25% moderate, and 25% above moderate. None of the projects that presented their concepts to the Board of Supervisors in the Workshop on March 19th came anywhere close to these assumptions. Rather, few exceeded 20% of total units at affordable levels. Neither the County nor the State have programs or a permanent source of funding in place to ensure this high level of affordability will result from rezones. As a result, the rezones are very likely to significantly overproduce at the above moderate, or market rate, level. Even without one rezone, the County is already 801 units over the target for market rate units.

To truly address the need for affordable housing, without further overdeveloping market units, the League also strongly recommends that the County investigate additional sites owned by the County and other public agencies to be used for affordable housing. We are encouraged by the Workforce Housing Study underway assuming the study will address all affordability income levels. Given the likely low production of affordable housing from this initial rezoning effort, we fully expect that additional rezones will be necessary to maintain no net loss of sites to meet your RHNA allocations in the affordable categories. The County should accelerate the development timeline for affordable units and be positioned to address the need for additional sites without rezoning more land for market rate housing.

The League also recommends that the efforts to secure a permanent funding source for development of affordable housing be accelerated. Funding, in addition to land, is needed to increase the production of affordable housing locally.

Finally, we recommend that a local preference program for housing at all income levels be initiated immediately. We want to ensure that all the housing that is produced from these rezones works toward solving our local housing crisis.

Sincerely,



Vicki Allen, Vice President, Communications
League of Women Voters of Santa Barbara



Dianne Black, Vice President
League of Women Voters of Santa Barbara