

Table 3: Comments Received on the Draft Housing Element (Prior to Release and during the Public Comment Period of 7/5/22 – 8/3/22)

Name of Sender/Date Received	Comment	Response
Mary Williams 03/11/22	<p>Reconsider the actual size of the lots being considered for development within their planning, and allow for smaller lots, ones without the practical space or logistics required for onsite parking and again, in the new revised AUD, offer the parking waiver fee for these smaller buildings. Plus allowing for as much sq ft., height, and stories as is practical, These things could possibly make these smaller projects affordable and financially feasible for these small out of reach projects. There are many underdeveloped lots that could provide 4-6 housing units, that could be quaint and charming downtown housing units helping to meet the overwhelming need for housing downtown, instead of what now exists, which unfortunately in our case, with our buildings is just small, struggling single retail locations, or worse yet another vacancy, as is the case with our 623.5 which has now been vacant for years.</p>	<p>Comment noted. This can be considered when program level decisions are made to incentivize certain housing types.</p>
Allied Neighborhoods Association 05/07/22	<p>The Housing Authority’s April 25, 2022 letter said they can leverage funds 10.2 to 1 or 8.7 to 1, depending on the type of project. We need to take advantage of this!!</p> <p>Funding for Affordable Housing needs to be a new Housing Element Goal. A range of funding ideas were presented at the April 28th joint meeting. These included allocating a percentage of TOT, a vacant home and/or vacant commercial property tax, development impact fees for commercial projects, increase TOT by a percentage (like the vote-approved additional TOT for the Creeks Division), and more.</p> <p>Probably the most expedient Affordable Housing funding would be to allocate a percentage of current TOT; there’s a strong nexus, as our tourist economy creates many low wage jobs. TOT revenue is rising quickly and above budget projections, and we’ve been told during a budget presentation on General Fund revenues that the average room rate</p>	<p>See GR-1.</p>

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	increased 40%!	
	<p>Housing Challenges. Our current Housing Element, back in 2015, identified short-term vacation rentals (and second homes) under Housing Challenges (pdf 57/104). It ends by saying “The use of residential units as short-term vacation rentals and/or only occupied as second homes poses a housing challenge to the City because these uses decrease available long-term housing opportunities for local residents as well as contribute to the increase of housing costs.”</p> <p>In the Inland area of the City (non-Coastal Zone area), the City needs to step up enforcement of illegal and/or unpermitted short-term vacation rentals.</p>	See GR-3.
	<p>Land zoned for hotel use and land zoned for higher density AUD housing are competing, as very often this prime land is zoned for both. As yet another and another property or building becomes a hotel, it seems the economics may have tipped in favor of hotels (with the big increase in average room rates). Also, it’s been reported that there are another 500 hotel rooms in the pipeline. We need housing, not more hotels with more low wage jobs.</p> <p>The City needs to seriously consider disincentivizing hotels as a housing strategy. This could be accomplished through policy and amendments to the Zoning Ordinance.</p>	See GR-3.
	Market-rate housing creates a need for more Affordable Housing; this is a conclusion of the 2017 Keyser Marston Study. At 10% Inclusionary, or 15% inclusionary, we are losing ground – and not even staying even.	Comment noted.
	Market-rate rental rates are very high. Allied has been providing to the City advertised AUD rental rates for over a year now. For the almost 60% of our residents that are renters, rents are becoming more and more unaffordable to our workforce and residents. There has been no evidence that building	Comment noted.

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	hundreds and hundreds of new apartments brings down prices. Just the opposite – rental rates are probably the highest ever. (Additionally, housing is being monetized as vacation rentals, and a newer trend of offering housing as furnished, especially nonapartment housing.)	
	“Living within our resources” needs to be explicitly stated in our Housing Element, hopefully in both the opening paragraph (as it is today) and in the Goals.	It is stated on page 2 of the Introduction.
Steven Johnson 07/10/22	Consider increasing the Business License fee for rental property to provide funds for affordable housing.	See GR-1.
	The City’s ADU ordinance limits the size of detached ADUs added to existing multifamily properties. The size limitation is contrary to State law, and might impact certification of the Housing Element.	The City’s ADU ordinance was submitted to State HCD.
	Please consider a zoning change to allow “car free” projects.	AUD Program projects within the Central Business District currently have a one-car parking <i>maximum</i> , making it optional for developers.
Dennis Doordan 07/11/22	Increase the inclusionary rate from 10% to 25% with the following provision: The City may consider decreasing the 25% affordable units as a percentage of the total number of units to 20% on a case by case basis where community services resulting from the project exceed standards set forth in applicable laws and zoning codes.	See GR-7.
	The City should pursue alternative strategies (i.e. alternatives to incentivizing for-profit development) such as increased funding for the Santa Barbara Housing Authority and support for Community Land Trusts.	See GR-1.
Allied Neighborhoods Association 07/11/22	No explanation or definition has been provided for terms “by-right approval” and “by-right processing”. Both terms are used in the Draft HE, and “by-right processing” is used in the Staff Report (pg. 3). HE-7 (pg. 90) uses both “by-right approval” and “by-right processing”. Without additional	See GR-9. It was not intentional to use both “by-right approval” and “by-right processing.” The correct term is “use by right”.

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	explanation of these terms, it is very difficult to evaluate text where these terms are used. We would appreciate staff explaining the terms, and application in the referenced sections.	
	We need to be careful about the language regarding the Program commitments we're making, especially as most of these Programs have not had the opportunity for more detailed explanation and public discussion. Some Programs have many ideas listed, but these should not be commitments prior to our normal robust public process to determine the specifics of each Program.	HCD requires the City to demonstrate a firm commitment to program implementation. The specifics of each program will be determined when they are implemented, and most will require a public process for approval.
	This HE Update process has some very compressed timeframes; the month of July is one of these. The Housing Element Draft is 250 pages!! Only 7 days from release of Draft to the Planning Commission deadline for written public comment, and only 5 days from release of the Staff Report to the deadline. In addition, the one and only City Council hearing until the very end of this process in early 2023, is also in July.	The timeframe is compressed but public comment was accepted until August 3, 2022. There are more opportunities for public input in the fall when the City issues an updated draft based on HCD's comments.
	A red-lined version of the "updated" Draft sent to HCD needs to be posted online after it's sent. There is interest in seeing the "updated" Draft and being able to review changes made from the "original" Draft we're now reviewing.	Staff will post an underlined/strike-through version of the revised draft.
	Policy 8.1. Identifying new funding sources for Affordable housing is absolutely necessary. We need to explore multiple ideas and not limit the effort to only looking at a single idea, in case that source of funding doesn't work out.	See GR-1.
	Policy 2.4: "Pursue partnership opportunities to develop affordable housing on City-owned sites." As we have stated in more than one letter, City-owned property, if considered for housing, should only be for price-restricted or deed-restricted Affordable housing – with no market-rate housing. Consider these sites as land banking for possible Affordable	Comment noted.

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	<p>housing. The Housing Authority project at the Carrillo/Castillo parking lot has been presented as having a large majority of Moderate Income Affordable housing (our understanding is housing above Low Income makes it ineligible to use federal tax credit program(s). There is a yet unknown (to the public) percentage of Above Moderate housing, with those rents price-restricted at below market rate. All housing in the project will be price-restricted.</p>	
	<p>Policy 2.1: "Prioritize production of deed-restricted affordable housing and community benefit land uses over all other land uses and housing types." As written, this seems to also prioritize non-residential community benefit projects. Is this what is intended? Does this fit within Goal 2, which only talks about housing? Community benefit housing. Currently, rental projects are community benefit housing (just because they are housing, no matter how expensive the rents). As Ms. Brooke stated earlier this year, previously it had been decades since construction of rental units – but now, this is not the case. It seemed to be left open, that maybe we need to revisit this. Yes, we need to revisit this topic and have that discussion - whether market-rate rental projects should receive the perks of community benefit housing projects. Goal 2 is about prioritizing Affordable housing.</p>	See GR-8.
	<p>HE-7: Affordable Housing Overlay. The second paragraph reads mainly like a list of ideas. "The AH Overlay incentives would be applicable for projects that substantially exceed the percentage of affordable units that would otherwise be required under inclusionary housing or local and state density bonus programs. AH Overlay projects will be provided incentives such as higher density, increased allowable height, lower parking requirements, by-right approval, objective design standards, streamlined permitting, deferral or reduction of permit fees, etc."</p>	See GR-4.

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	Substantially is a very subjective term and will need to be discussed and defined.	
Scott Wenz, Cars Are Basic 07/12/22	Any and all Housing Plans need to have adequate auto storage (aka garages) for off street parking. One parking place per bedroom in today's society is not adequate. Needed on-street parking is an absolute necessity for business health.	Comment noted.
	Any and all Housing Plans need to have adequate Street Planning that includes "Emergency Response." Safety personnel response - Evacuation from disaster - etc. Street narrowing and corner Bulbouts (street extensions) interfere with multiple response, turns by large vehicles.	Comment noted.
	As has been fully experienced bikes, walking, and bus use "alternatives" has failed for decades. (Bike plan 2016 to now, decades of MTD failed ridership including shuttles, and walking).	Comment noted.
	Density Plans driven by SB-9 and RHNA are, and have been destroying local planning based upon available land and natural resources. Density above and beyond these resources create long term erosion of quality of life, increases crime, and/or lack of pride of ownership/rental. High density in San Francisco, Baltimore, Detroit, and other locations prove this failure long term. The short of it is, unless fought, the above State Driven Plans will destroy ALL local zoning and planning in the State.	Comment noted.
	CAB urges the PC to look at neighborhoods that have increasing density without street capacity, or proper off-street storage of autos/trucks.	Comment noted.
Stanley Tzankov 7/12/22	We need to make sure the definitions of levels of affordability in the Housing Element reflect the realities of people's budgets, which they fail to currently.	See GR-9. The U.S. Department of Housing and Urban Development (HUD) has specific definitions for tiers of affordable housing.

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	We need a concrete plan to build significantly more housing that's truly affordable, including the creation of sensible and bold funding and financing streams for affordable housing construction.	See GR-1.
	We need to be mindful of and integrate tenant protections in the Housing Element.	Goal 4 is focused on tenant protections and Program HE-19: Renters Rights Information will require landlords to provide renters rights information with their lease.
	We need a much more robust community input process that meaningfully and proactively engages workers, renters, and families who are struggling to make their way forward in Santa Barbara.	See GR-5.
Richard Flacks, Santa Barbara County Action Network (SBCAN) 07/12/22	<p>We need to set our sights higher. The HE makes clear that the needs for affordable housing are far more urgent than the figure cited. The HE should incorporate specific policy ideas that can help the community raise its housing sights. In particular, the city needs to consider specific ways to create a reliable revenue stream that will enable the Housing Authority of Santa Barbara and other non-profit entities to increase affordable housing production. Such a package, earmarked for affordable housing, could include the following:</p> <ul style="list-style-type: none"> • An increase of bed tax rates (Santa Barbara city bed tax is lower than comparable communities). An increase to 15% from 13% would bring the city in line with other communities' TOT. This should be proposed as a specific tax for support of affordable housing. • A 'deed transfer' tax aimed at high-end property sales (many California cities have been instituting a version of this). • A 'vacant homes' tax on vacant residences (and commercial space?) and possibly aimed at vacation rental uses of residential property 	See GR-1.

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	<p>The HE should point out several ways the city could immediately begin creating an affordable housing revenue stream:</p> <ul style="list-style-type: none"> • Allocate a portion of the annual bed tax revenue to the SB Housing Authority and other nonprofits to initiate a regularized financial resource for social housing (pending passage of the proposed TOT rate increase) • Explore the investment of city reserve funds in housing development to strengthen the social housing funding stream. • Encourage formation of a housing land trust to enable the banking of land for social housing • Implement ideas already mentioned in the HE: encourage ADU development earmarked for affordability, provide tenant “first right of refusal” when rental property is for sale. • Finally—and crucially—the HE should suggest that the city adopt a rent stabilization ordinance as a necessary immediate measure in the face of inflation. Along with an annual anti-inflationary cap on rents, the city should be urged to establish a rental property registry as a necessary tool for managing the cost and habitability of rental housing. 	See GR-1.
Patricia Saley 07/12/22	<p>How is “affordable” defined? While I appreciate that there is a listing of all acronyms and abbreviations on page vi, I did not find a glossary or a list of definitions. This is really important as my definition of “affordable,” for example, may be different than the Housing and Community Development Departments’, the Planning Commission’s, the Council’s or staff’s definition. I suggest that the word be capitalized (Affordable) when the units are deed-restricted or have another legal mechanism to insure they will be rented or sold to the target income group.</p>	See GR-9.

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	<p>I am aware that there is a lot of data available through 2020, though the latest year for which data is presented is 2019, three years ago. Even 2020 data is two years old and, as we all know, Covid and other factors have changed the housing market significantly since 2020. The most recent data should be used throughout the HEU.</p>	<p>See GR-10.</p>
	<p>Some tables and charts (e.g., Table 10 on p. 17, Housing Unit Types) include data from 2010 as compared to 2019, which is helpful as it shows changes over time. However, in some crucial instances, stand-alone data for 2019 is provided without any comparison. Two examples of this lack of comparison are on p. 18 in Tables 11 and 12 that address Occupancy Status and Type of Vacancy respectively. If these two tables included 2010 data as compared to 2019, we would all see the trends and could revise the programs accordingly.</p>	<p>Tables 11 and 12 were revised to show the time span comparison.</p>
	<p>In terms of the HEU analysis and Appendix D, staff did a voluntary survey of all ADUs that have been permitted and built with a 16.3% response rate, which is very low. This limited data (from a non-scientific study) was used to guesstimate affordability of all ADUs in the City and extrapolate out to 2031. I couldn't readily find information about how many of those units were truly low income, i.e., with some sort of legal mechanism to keep rents low. I also understand that if an ADU is used by a family member, say a child home from college for the summer, that unit is considered low income as the rent is low or non-existent. If that home and ADU were sold, that ADU could be rented for more than \$2,000, thereby rendering it an above moderate unit. It comes down to how "affordable" is defined and are a good percentage of ADUs truly affordable under that definition?</p>	<p>There is no legal mechanism regarding rents (i.e., affordability covenants) on ADUs at this time. See GR-11.</p>
	<p>Proposed programs need to have "active" verbs, not passive. For example, Program HE-8 on p. 91 is titled, "Inclusionary Housing Ordinance Evaluation." How does evaluating an ordinance change anything? The</p>	<p>Comment noted and some programs were revised to include follow up implementation actions. Also see GR-7.</p>

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	<p>ordinance should be evaluated and amended to advance specific goals of the HEU. I suggest that every program be reviewed through the lens of whether it is clear what action will occur beyond studying the problem it seeks to solve.</p>	
	<p>Time frame for programs is mostly “pending public review” – I question how decision-makers, the public or HCD can assess the effectiveness of programs when we’re not given any inkling of when they would be implemented. I understand the tight timeline to submit the HEU, but there are only two public hearings (PC on July 14th and Council on July 26th) prior to staff revising the document and sending it off to HCD, but no one will know what the timing of most programs will be. The public needs an opportunity to weigh in on timing of programs so that the Commission and Council hear our input and can advise staff on how to revise the HEU.</p>	<p>Staff requested input from the Planning Commission and City Council regarding implementation priorities and will use that input along with public input to develop time frames for implementation.</p>
	<p>With the adoption of the updated Historic Resources Ordinance two years ago, properties placed on the Historic Resources Inventory and potential Historic Resources Districts are also afforded similar protection as Landmarks and Structures of Merit in the review process. Consideration should be given to whether these properties should be included on the Suitable Sites Inventory. If they are included, the adaptive reuse policies and programs should be strengthened to protect the integrity of these resources while also providing needed housing.</p>	<p>The Suitable Sites Inventory removed properties on the Historic Resources Inventory and within potential Historic Resources Districts.</p>
	<p>Goal 1 (Create New Housing), Policy 1.8 – This policy speaks to multi-unit housing densities and standards to allow for a variety of affordability levels. Given the City’s track record on providing many units for above-moderate and higher income levels, we collectively have not done a good job on providing units for low and moderate-income groups. If we’re going to allow flexibility in densities and standards for new units, most if not all of those units should be in the low to moderate-income range.</p>	<p>Comment noted.</p>

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	<p>Program HE-3 (Amend Zoning Ordinance) to promote Lower and Moderate-Income Housing as a “community benefit” – The City has built many above-moderate income units through the AUD and other programs, with relaxed standards to promote more units. Given how these flexible standards have resulted in very few units that are available to lower and moderate-income groups, we need to give meaningful priority and preferences to those targeted groups. One way to do that would be to change the definition of “community benefit” to clarify that it only applies to lower to moderate-income housing, not above moderate and higher.</p>	<p>Comment noted.</p>
	<p>Goal 2 (Prioritize Affordable Housing) and policies – I recommend these policies have a specific target or range of units that will hopefully be built to serve lower and moderate-income households. Policy HE-10 is titled “Track No Net Loss” which is a good idea, but there needs to be some action that happens as tracking doesn’t do anything unless there is follow-up action.</p> <p>My recollection is that the Commission and Council wanted preference for Affordable housing to go to people already living in Santa Barbara and employees that commute in from Ventura or North County. This does not appear to be in the HEU.</p>	<p>Regarding No Net Loss, the City has a statutory requirement when making land use decisions to ensure capacity at all times to accommodate RHNA by income group. If at any time during the planning period, the City finds there is a shortfall of sites to accommodate remaining RHNA, we must take immediate action to correct the shortfall by amending the Housing Element sites inventory to either include sites previously unidentified with capacity to accommodate shortfall, or rezone sites to correct for the shortfall.</p> <p>HUD allows Public Housing Authorities (PHA) to set local preferences for those who live or work in the jurisdiction which the PHA serves so that the resources intended to serve residents of that community are properly allocated. The City’s Housing Authority sets their local live/work preference jurisdiction as the entire South Coast of Santa Barbara County (Gaviota through Carpinteria) so as not to create a disparate impact on a protected group. With legal input, the City could consider a similar preference system for deed restricted affordable housing not provided by the</p>

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		Housing Authority as long as the boundary is sufficiently broad, like the South Coast, to ensure that it follows Fair Housing Laws.
	Goal 4, HE-15 (Short-term Vacation Rentals/Hotel Ordinance), Goal 5 (Preserve Housing) and Policy 8.1 re new funding sources – One of the best ways to provide housing is to fully utilize what has already been built. Short-term rentals are another form of a hotel and they take units off the market. The same applies to homes that are not primary residences, i.e., vacation or second homes. I suggest the programs under these Goals be expanded to the effect of, “Adopt an ordinance that imposes a vacancy or similar tax on homes that are not occupied at least half the year.” The funds raised could be used by the Housing Authority and non-profit groups to reduce the per unit cost of truly affordable housing.	See GR-1. Vacancy tax will be considered under HE-24.
	Goal 5 and its policies and programs should have stronger language re adaptive reuse, particularly of older and historic structures.	Goal 5 is focused on maintaining existing housing but Policy 1.3 was revised to include historic residential structures as adaptive reuse candidates.
Vicki Allen, League of Women Voters of Santa Barbara 07/12/22	We request that the Quantified Objectives be revised upward to show a commitment to deed restricted Capital A Affordable Housing and confidence in the newly identified programs.	See GR-12.
	The reliance on ADUs to meet the majority of very low and low income units is misplaced and overoptimistic. The use of an ADU for a lower income senior or a college student would need to be tracked and should not be counted for RHNA very low to moderate income units unless there is a restricted deed or other enforcement mechanism.	See GR-11.

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	<p>HE-2 (under Goal 1): La Cumbre Plaza Specific Plan could include “consideration of Arroyo Burro Creek, public open space, multi-modal circulation, utilities, topography, and increased height limits,” but no mention of affordable housing (which was included in the description of that same item in the Cycle 5 HE). The Specific Plan for La Cumbre Plaza needs a creative vision and a chance to leverage that site for a significant amount of affordable housing. This should occur with a robust community input visioning process that includes workers and renters who are the most impacted by escalating rents (see Charts 4 and 5). Stakeholders could explore new innovative models of housing developments (under Goal 1 - HE-6) and community investment models. A large parcel like La Cumbre could be ideal for cohousing for purchase developments or limited equity cooperatives for all family types.</p>	<p>See GR-6. HE-2 was revised to include affordable housing.</p>
	<p>The two programs HE-7 “Affordable Housing Overlay” and HE-8 “Inclusionary Housing Evaluation” are confusing and need work. We will have more to say when we complete our examination of the opportunities for the local and state bonus programs to work together for a maximum result, but we believe that the minimum percent for the AHO should fall between 50 and 100% for the low or very low incomes. Our recommended requirements to get the maximum incentives such as taller buildings and City owned land will also require a very high percentage of the units to be for very low to moderate incomes.</p>	<p>Comment noted. The details of the programs will be determined when the work efforts are implemented.</p>
	<p>We need to hear more from the less housing secure part of the community. In a city with few vacancies and 59% renters there are thousands of residents without housing security. The efforts to reach them during the HEU process have fallen short. We recommend that the City meet with groups like the SB Tenants Union, CAUSE, young parents, grad students, etc. at a time convenient to them to initiate two-way conversations and</p>	<p>See GR-5.</p>

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	workshops. Goal 4 Promote Housing Stability and Goal 6 - Engage the Community appear to be one way communication efforts to get info distributed to tenants. We believe that an effort to engage renters to hear about their needs and to help find housing solutions that are affordable and appropriate for them would be a valuable use of resources.	
	Goal 8 - We need a realistic funding source and timeline for the provision of very low and low income units. This is critical to making progress in meeting RHNA. We request that the City commit to a short-term funding source before a tax initiative can pass as well as a contingency funding source in the event that various tax options are not approved by the voters.	Comment noted.
	Finally, we request that a Glossary of Terms be included at the end and throughout the HEU document to aid in the understanding and intention of the policies and programs that use them. In particular, the public should know the meaning of the following when used for City purposes: 'Middle Income', 'Above Moderate Income', 'Upper Middle Income', 'Workforce', 'Downtown Workforce', and 'Community Benefit'.	See GR-9.
Lisa Burns 07/12/22	Please include potential use of the city's downtown surface parking lots as a source of land that the City Housing Authority could use to build rent-subsidized units in the airspace above & around existing surface parking. Dr. Gregory Morrow at the UC Berkeley Urban Housing Symposium (October 23, 2019) specifically addressed how conversion of parking to housing, increases the tax base while adding aesthetic character to downtown. See the discussion at minutes 39 through 52. https://www.youtube.com/watch?v=HWDcjVHMaVo&t=15s The most relevant surface parking lots to include in the Housing Element at this time, would be parking lots 3, 4 & 5 since they relate to the State Street Advisory Committee's work on housing, building massing & scale.	See GR-2.

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	<ul style="list-style-type: none"> • Downtown Parking Lot 3 APN 039-281-41 1.53 acres Downtown Parking Lot 4 APN 039-231-034 1.15 acres • Downtown Parking Lot 5 APN 039-181-19 1.70 acres 	
Maria Cincotta 07/12/22	I just want to voice my support for a Housing Element Update that includes the creation of adequate amounts of housing that's truly affordable without causing displacement. Santa Barbara is a special place, but it won't stay that way if it becomes only accessible to the rich. Please do your part to stop the rapid displacement of citizens who can't afford constant rent hikes that are neither commiserate [sic] with regular local salaries nor with the rate of inflation.	Comment noted.
Lisa Carlos 07/12/22	Recommendation: Add more language on how Quantified Objectives were derived and calculated. Also clarify the feasibility assumptions that the City has about funding affordable housing. If the City doesn't place a high probability on such funding initiatives happening, then the draft should be transparent about their anticipated shortfall in funding and what the implications and solutions are regarding affordable housing production goals.	See GR-12.
	Recommendation: Given the low response rate on the ADU survey, I'd present Quantified Objectives with and without the ADU's factored in as moderate income and below categories. I do not support allowing ADUs rented for free to count as "very low income" until a more carefully thought out tracking system under HE-11 under Goal 2 is piloted and shown to work. I would recommend that we establish what the cost of such a system would be, how frequently would the City check in with ADU owners to see if the rental status has changed, and see if participation rates in providing such information yield higher response rates than this past survey. Finally, if we really want to count ADU's as equivalent to deed-restricted affordable	See GR-11. Details about the programs mentioned here will be provided when the programs are implemented.

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	housing then we should put in place a subsidy incentive program to encourage property owners to build deed-restricted ADUs.	
Ames Balliet 07/12/22	I would like to voice my support for a Housing Element Update that includes the creation of adequate amounts of housing that's truly affordable without causing displacement. I also want to support rent control - a 2% cap on rent increases for the city of Santa Barbara. Please pass rent control so that working-class and lower-middle class people can afford to stay in Santa Barbara.	Comment noted.
Steve Fort 07/13/22	If per Policy HE-7 an Affordable Housing Overlay is pursued, the entitlement process has to be significantly simplified in that overlay.	Comment noted.
	We need to decide if we really want to build housing. If so, and we are going to continue to require Inclusionary units, the entitlement process should be generally ministerial for those projects. Entitlement process risk and length need to be drastically reduced to encourage projects subject to Inclusionary requirements. Or, eliminate the inclusionary requirement, eliminate density restrictions, implement FAR or very objective design guidelines, and put in place local preference requirements or a tax scheme that will disincentivize second home/weekend getaway buyers. Eliminate the risk for housing to be built for people with local jobs and responsibilities.	Comment noted.
Gavin Spencer 07/13/22	We are only hurting our community and the planet as more people are forced to move further away from town and commute from either Oxnard or up north in Santa Maria. As the number of people are displaced the longer people are required to commute resulting in a subsequent increase of greenhouse gas emissions. We must see housing justice as an intertwined issue with the climate crisis. We should act boldly and recognize the community benefit and ecological benefit that local housing provides.	Comment noted.
	We desperately need a higher stock of affordable housing options in town to support the service class and elderly.	Comment noted.

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John Douglas 07/13/22	Please support a Housing Element Update that includes the creation of adequate amounts of housing that's truly affordable without causing displacement. Don't force people who work here for the city, county and private businesses to spend significant portions of their lives commuting back and forth from points north and south, missing out on critical family activities like their kids' after school sports competitions, performing arts and other after-school activities.	Comment noted.
Daisy Beamon 07/13/22	I am writing to urge your support for a Housing Element Update that includes the construction of adequate amounts of truly affordable housing without causing displacement.	Comment noted.
Amanda Cobb 07/14/22	<p>Add language to an existing ordinance or develop one that requires landlords to provide at least 2 (maybe 4) weeks between the signing of the lease and the start of the lease. Almost everything I was looking at was a "start now," as in, the lease started in less than a week. For example, yesterday I found out I was approved for a place finally (after months of searching), and the lease starts tomorrow. Because starting leases so quickly is the norm, landlords often choose people who are able to move immediately so they can collect the most rent. I was told that there were groups who could move in on the 15th, so if I could not I would not be chosen.</p> <p>This makes sense, and I understand that landlords are also stakeholders and need to pay off their investments. However it ultimately leads to tenants having to pay double rent, or makes them wait until they are just about to get kicked out of a current lease to find a new home if that is not feasible. By requiring a buffer, this would shift the norms of the rental market and allow people to find new housing situations in advance, rather than scrambling.</p>	Comment noted and shared with Housing and Human Services staff.

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	<p>Almost every housing unit I found was posted on craigslist. During my search, I would reach to almost 5-10 people a day in hopes that I could hear back. I rarely did from legitimate places because they were apparently receiving over 100 calls. I did however receive replies from scammers every day. I am lucky to have been able to spot this. My dad is also a commercial real estate agent and was able to look up the owner for me through some database he had before I gave anyone my SSN, bank info, etc. for them to run a credit check. I am sure there are so many not lucky enough who have lost money. Is there a way the city can intervene? This would be a big undertaking I am sure, however a very positive one. This could also discourage landlords from running credit checks and taking money from multiple parties when they could just run one at a time. Many property management companies told me to apply because they were getting tons of applicants before I even toured a place, but to apply there was a fee. I did it, because I wanted to be considered, but there is no need to run a credit check on that many people, and it leads to tenants paying hundreds in application fees for places they will never be considered for.</p> <p>Some ideas:</p> <ul style="list-style-type: none"> - Can credit check information be run through the city? Could residents send their personal information to a platform the city facilitates, and then the city can verify property management before passing along the information to the landlords? My fear with this is that it would be a huge extra cost that would be passed on through application fees, but if there is a way to keep the costs down that would be fantastic. -Can the city host a platform like Zillow or craigslist that verifies ownership of units since the city already has that information? 	<p>Comment noted. HE-20 was revised to include more information for renters, including how to avoid rental scams.</p>
	<p>Can the city encourage the development of more two or three bedroom units? This is just anecdotal, but I found that there were TONS of studios</p>	<p>Comment noted.</p>

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	<p>and some one bedrooms, as well as a lot of 4+ bedroom units, but very few 2-3 bedrooms. I think the studios come from the rise in ADUs which is fantastic. Is there space in current ADUs to provide two bedrooms? Large places are conducive to big families and student groups, but for those of us in that 25-35 age range, access to living situations where we can have 1-2 roommates or a partner would be helpful. Studio living is a challenge, especially in our work from home world. It also is more affordable seeming to find a place and split it. I saw multiple studios with a hot plate going for \$2-3k a month, while the 2 bedrooms were a bit more reasonable.</p>	<p>ADUs range in size but many can be large enough to accommodate two bedrooms. While the majority of new units constructed under the Average Unit Size Density Incentive Program are studios and 1-bedroom units, there are 205 two bedroom units and 71 three bedroom units on the Program Cases list as of December 2021. Program HE-6: Innovative Housing Types will identify new types of housing that could accommodate group living situations, such as shared or cooperative housing and group quarters.</p>
	<p>Tons of landlords do not allow Cosigners, and I was told directly from property managers that they do so because they do not want student groups. This is not applicable to me, however, I wanted to call it out because it seems like a covert way to practice age discrimination. Obviously, being able to have a cosigner is a privilege that not all can have, but it seems like a very obvious way for landlords to weed out young people, which is illegal. What is the harm in having a cosigner beyond the assumption that they are students? Can the city work on this issue? Incorporate it into the AFFH section, possibly do education on age discrimination? Can this be enforced as age discrimination?</p>	<p>Comment noted. Consider contacting the City's Fair Housing Enforcement Officer to determine if this is a case of age discrimination. https://santabarbaraca.gov/services/housing-human-services/fair-housing</p>
<p>Alex Pujo 07/15/22</p>	<p>I am reading the 2023 Draft looking for precise numbers of dwellings built (and/or received a building permit) in Santa Barbara since the last (2015) Housing Element. The document is long and thorough but ...Is there a summary somewhere listing the actual accomplishments of the 2015 Housing Element?</p> <p>The Draft shows that the difference in inventory between 2010 and 2019 is 1,741 dwellings (page 17).</p>	<p>The revised draft will include an Executive Summary with the total number of units that received a building permit to date in the 5th cycle.</p> <p>Table 10 on page 17 is from the Census Bureau's 5 year American Community Survey, which tends to have a large margin of error. Total number of units (completed/with building permits) from 2015 to 2021 (up to December 31, 2021) = 1,592 (this comes from our</p>

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	<p>I remember reading that the total number of AUDs that received building permits between 2015 and 2021 is 1,682 units. (Is that the number of AUD units only?)</p> <p>I also remember reading that the total number of ADUs from 2018 to 5/17/22 is: 359 constructed + 224 with bldg. permits = 583.</p> <p>Are these numbers correct?</p>	<p>annual Housing Element report and includes ADUs, AUD, condos, and single unit developments).</p> <p>Total ADUs (completed/with building permits) from 2017 to July 15, 2022 = 601 (most of which would be included in the number above).</p>
<p>Kendra L. Webster 07/21/22</p>	<p>We ask that City Council prioritize:</p> <ul style="list-style-type: none"> - Goal 2 (Prioritize Affordable Housing) - Goal 3 (Provide Housing Assistance) - Goal 8 (Fund Affordable Housing). <p>Within each of these goals, we ask that City Council direct staff to implement the following programs first:</p> <ul style="list-style-type: none"> - HE-25: Affordable Housing Funding - HE-12: Affordable Housing Trust Fund - HE-13: Support Rental Housing Mediation Program - HE-20: Renters' Rights Information - HE-15: Short Term Vacation Rental Ordinance 	<p>Comment noted.</p>
<p>Joyce Berg 07/21/22</p>	<p>We ask that City Council prioritize:</p> <ul style="list-style-type: none"> - Goal 2 (Prioritize Affordable Housing) - Goal 3 (Provide Housing Assistance) - Goal 8 (Fund Affordable Housing). <p>Within each of these goals, we ask that City Council direct staff to implement the following programs first:</p> <ul style="list-style-type: none"> - HE-25: Affordable Housing Funding - HE-12: Affordable Housing Trust Fund - HE-13: Support Rental Housing Mediation Program 	<p>Comment noted.</p>

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	<ul style="list-style-type: none"> - HE-20: Renters' Rights Information - HE-15: Short Term Vacation Rental Ordinance 	
Meghan Macias 07/21/22	<p>We ask that City Council prioritize:</p> <ul style="list-style-type: none"> - Goal 2 (Prioritize Affordable Housing) - Goal 3 (Provide Housing Assistance) - Goal 8 (Fund Affordable Housing). <p>Within each of these goals, we ask that City Council direct staff to implement the following programs first:</p> <ul style="list-style-type: none"> - HE-25: Affordable Housing Funding - HE-12: Affordable Housing Trust Fund - HE-13: Support Rental Housing Mediation Program - HE-20: Renters' Rights Information - HE-15: Short Term Vacation Rental Ordinance 	Comment noted.
Steve Johnson 07/21/22	<p>SB 1067 promotes “car-free” housing projects within 1/2 mile of public transit.</p> <p>The City could improve on SB 1067 by zoning for “car-free” housing within 1/2 mile of public transit, with the caveat that residents must annually submit confirmation that they do not own or lease a vehicle (anywhere). Such projects (if built) would be 100% affordable by design; above moderate income earners will be unlikely to accept the car-free requirement.</p> <p>The worst possible outcome from car-free zoning is that no such projects would be built. The best possible outcome is a spike in the production of market rate, moderate income housing.</p>	<p>AUD Program projects within the Central Business District currently have a one-car parking <i>maximum</i>, making it optional for developers.</p> <p>The Housing Authority of the City of Santa Barbara is able to monitor car ownership and target their downtown housing units for tenants without cars.</p>
Chris Barrios 07/22/22	There is more I do not understand than what I do understand however it is clear that we need housing, affordable housing. I will parrot some of what I heard. We need open funding streams for non-profits. We need housing	Comment noted.

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	<p>equity. Perhaps we need an “affordable housing overlay”. Maybe we need a Vacancy tax. We definitely need a Short-Term Rental Ordinance. Maybe we need a Voter Initiative for some of these asks.</p> <p>We ask that City Council prioritize:</p> <ul style="list-style-type: none"> - Goal 2 (Prioritize Affordable Housing) - Goal 3 (Provide Housing Assistance) - Goal 8 (Fund Affordable Housing). <p>Within each of these goals, we ask that City Council direct staff to implement the following programs first:</p> <ul style="list-style-type: none"> - HE-25: Affordable Housing Funding - HE-12: Affordable Housing Trust Fund - HE-13: Support Rental Housing Mediation Program - HE-20: Renters' Rights Information - HE-15: Short Term Vacation Rental Ordinance 	<p>Comment noted.</p>
<p>June Michealsen 07/22/22</p>	<p>Please do everything possible to add affordable housing units to our city. Don't just inventory vacant or underutilized sites but make plans to use those for housing (YES, YES to the LA CUMBRE SITE for example). Consider nonresidential and motel sites for housing. Consider a site for an additional trailer park or prefab housing (DIGNITY MOVES PROVIDES A MODEL). STREAMLINE the design review and permitting process. People give up hope or run out of money before a project reaches completion. Consider a tax on second homes/vacation rental properties that could help fund affordable housing. Bless nonprofits who build housing units with streamlined approvals and reduced permitting costs.</p>	<p>Comment noted. Many of those suggestions are proposed Programs, the details of which will be provided when the programs are implemented.</p>

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	Look at the model of units at Saint Vincent's. No one talks about what they've done but it is remarkable. Support them and similar groups.	
Lisa Carlos 07/22/22	<p>For Goal 1, deregulating building codes and streamlining approvals may generate more market rate housing, but it won't be "affordable." Simply put, relying on for-profit developers to solve our affordability crisis isn't a viable short or long term strategy since their rents will always be based on what the market will bear.</p> <p>Therefore, the only real solution is to invest in deed-restricted housing that is affordable in perpetuity and not subject to market forces. This is why Goal 2 and Goal 8 are so important.</p>	Comment noted
	<p>State efforts to dilute Goal 2, such as allowing ADUs to meet our lower income RHNA requirements, must be handled with caution. If the City is seriously considering reporting ADUs in these lower income categories, then the ADU tracking system outlined in HE-11, Goal 2 must have a much higher and representative response rate than that of their recent survey, which was only 16% or 57 respondents (p. B-3, Appendix B, Draft 2023 HEU). The City must also commit to double-checking ADU rental status regularly and categorizing RHNA numbers accordingly. Until such a system is working reliably, the City should report affordable housing outcomes in two categories: deed-restricted and non-deed restricted.</p>	<p>Comment noted.</p> <p>Per HCD requirements, the City currently reports affordable housing outcomes annually to HCD in two categories: deed restricted and non-deed restricted.</p>
	<p>We have a humanitarian housing crisis that requires immediate financial relief because proposed HEU programs will take 4-8 years to implement and make a difference. That is why I implore the City Council and the Finance Committee to work expeditiously and diligently to make it their very top priority to allocate bridge funding from the General Fund, Contingency Reserves or through whatever mechanism needed to provide renters some relief through emergency renter grants, similar to those provided during the pandemic. At the same time, the City should allocate as close to \$5 million</p>	Comment noted.

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	in funding to the Housing Authority this next fiscal year so that they can leverage that to build 150 units of housing, as per Rob Fredericks' presentation to the City Council and Planning Commission last spring.	
Rich Block 07/22/22	<p>We ask that City Council prioritize:</p> <ul style="list-style-type: none"> - Goal 2 (Prioritize Affordable Housing) - Goal 3 (Provide Housing Assistance) - Goal 8 (Fund Affordable Housing). <p>Within each of these goals, we ask that City Council direct staff to implement the following programs first:</p> <ul style="list-style-type: none"> - HE-25: Affordable Housing Funding - HE-12: Affordable Housing Trust Fund - HE-13: Support Rental Housing Mediation Program - HE-20: Renters' Rights Information - HE-15: Short Term Vacation Rental Ordinance 	Comment noted.
Citizens Planning Association of Santa Barbara 07/23/22	<p>We agree that the La Cumbre site has the potential to provide opportunities for the kind of housing we need, while maintaining a commitment to the City's environmental and historic resources. We urge a robust and transparent public engagement process, reaching out to current residential Santa Barbarans. That public engagement process should also address the infrastructure needs of our public schools and the existing traffic congestion on Upper State Street, as well as providing clear explanations of what plans, specifically, are proposed.</p>	Comment noted. Public engagement will be included in the La Cumbre Plaza planning process once it is initiated.
	HE-16: Residential Units Conversion. The City will evaluate the Conversion of Residential Units to Condominiums, Hotels, or Similar Uses ordinance to determine if amendments are needed to ensure no net loss of affordable units.	Comment noted. Program HE-8 was revised to include "No Net Loss" units are added in addition to the inclusionary requirement.

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	We would support an Affordable Housing Replacement Ordinance that would be retaining the affordability of the units destroyed plus whatever percentage inclusionary; e.g., if an affordable triplex is replaced with a multi- of 20 units, there must be 3 affordable plus 3 (if 15%).	
	HE-19: Fund Home Repairs for Senior and Disabled Homeowners and Renters. To the extent possible, based upon the availability of funds.... This assistance should be for all income-qualified residents.	Comment noted.
	Goal 1, HE 1: the City will evaluate, and if appropriate, <i>as determined by whom?</i> amend the Zoning Ordinance and other portions of the Municipal Code to remove potential constraints for adaptive reuse, such as review/approval process, design, open yard, and parking standards.	Program HE-1 was revised to remove the “and if appropriate” clause.
	Goal 1, HE 3: Streamline the design review process to reduce the number of hearings and appealable actions for projects that require design review approval. We are alarmed by this open-ended statement and point to Page 59 of the Draft that notes re coastal development processes, "While the City adheres to Permit Streamlining Act timelines... it is also required to comply with CEQA... and has little control over the time required to meet statutory requirements for the review and analysis of projects that are subject to these State laws." All such "streamlining" for coastal and inland projects must be done in the open, with ample public participation and input.	The amendments noted in this program are subject to an open public process of review and approval before the Planning Commission, Ordinance Committee, and City Council with ample opportunities for the public to participate.
	Goal 2 HE-7: Affordable Housing Overlay - AH Overlay projects will be provided incentives such as higher densities, increased allowable height, lower parking requirements, by-right approval, objective design standards, streamlined permitting, deferral or reduction in permit fees, etc.; We have concerns about how an overlay would work: for instance, would a subsequent affordability overlay take precedence over an existing overlay, for instance, over the EPV, or over the Upper State Street overlay? There	See GR-4.

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	needs to be a full study of all effects of such an overlay, including of unintended consequences.	
	Goal 6 Policy 6.2: Develop campaigns that raise awareness about the importance of and need for housing and affordable housing citywide. Build and maintain relationships with local journalists, media outlets, and community organizations to help expand awareness of housing challenges, initiatives, needs, and resources. We support this Goal, of course, with the important addition that education about the City's history of good planning, and historic and environmental protection be incorporated into any such campaign.	Comment noted. Policy 6.2 was revised to incorporate resource protection.
	Goal 7 Coordinate with regional partners...The City will work with other jurisdictions to advocate for State legislation that would provide ongoing funding for nonprofit developers to build affordable housing and other programs to address South Coast housing needs...In addition to seeking State legislation to provide funding for affordable housing, the City could express opposition to the seemingly endless volume of State legislation that further removes and erodes local planning discretion. In addition, this would be an excellent opportunity for the City to advocate that the State provide funding to support infrastructure needed by these non-profit entities that won't be paying property taxes (water, roads, sewer, schools, etc.) as well as ongoing contributions to schools, fire, police etc.	Comment noted. Program HE-22 was revised to acknowledge infrastructure improvements and community support needs.
Allied Neighbors Association 07/24/22	Table 16: Cost Burden by Tenure and Income Category (Draft HE, pg. 24). Some of the numbers are very sobering. The current situation must be worse as datasets were 2014-2018, and rents have increased considerably since then. From Table 16: Rental Households, Total Lower Income Overpaying (over 30% of income) is 77.2%. Lower Income Overpaying (more than 50% of income) is 51.1%; Over Moderate Overpaying (more than 50% of income) is only 2%. It's hard to overstate the importance of	Comment noted.

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	adopted 2023 Housing Element Goal #2, “Prioritize Affordable Housing” and Goal #8, “Fund Affordable Housing”. Affordable Housing (deed-restricted housing) is more important than ever.	
	New language in the Draft HE, pg.2. “The City has a long-standing commitment to affordable housing and sound community planning, and enhancing the quality of life by “living within our resources” has been a fundamental goal since adoption of the first General Plan in 1964.” The suggested new language is different enough from our current 2015 Housing Element <i>that the meaning is not the same</i> , and that’s a problem. We suggest using our current, 2015 Housing Element language (Introduction, pg. 1, first and second sentences): “The City has a long standing commitment to affordable housing and sound community planning. Protection and enhancing the quality of life and “living within our resources” have been fundamental goals for Santa Barbara since the adoption of the first General Plan in 1964.”	The draft was revised to use the 2015 Housing Element language.
	”Importantly, the City does not charge any development impact fees for community infrastructure...” (Draft HE, pg. 62). Important to note, other South Coast jurisdictions charge development impact fees, which can be quite substantial.	Comment noted.
	Average time from application submittal to Planning Approval (Draft HE, pg. 60). Table 32: Example Residential Development Timeline illustrates City compliance with permit streamlining timelines. It also shows three, 3- to 4-month periods between steps in the process by the Applicant. Long time gaps, adding to the length of the process, are on the Applicant side of the equation.	Comment noted.
	Funding Affordable Housing. With 59.3% renters, we also have great need for Affordable Moderate Income rental housing. AMI is \$100,100; the Moderate Income category is 80 – 120% of AMI. Moderate Income housing	Comment noted.

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	does not qualify for federal tax credit programs used by the Housing Authority. We need to identify local funding so deed-restricted Moderate Income housing can be built. Otherwise, it will continue to be very difficult for residents and our workforce in this income category to afford to live in Santa Barbara, and it will also continue to affect public and private employers' ability to attract and retain workers.	
Patricia Saley 07/24/22	<p>Goal 1 - Create New Housing</p> <ul style="list-style-type: none"> • The upcoming La Cumbre Specific Plan has great potential to provide many lower income units with onsite and nearby amenities and services. • The discussion about Accessory Dwelling Units needs more work as the data provided in the HEU is based on a voluntary survey with a very low 16% return rate. Some sort of tracking system is needed to give annual (or more frequent) data about use and rental rates of ADUs. Incentives to have most of these units be truly (deed-restricted). Affordable should be provided. 	See GR-6 and GR-11.
	<p>Goal 2 - Prioritize Affordable Housing</p> <ul style="list-style-type: none"> • Many would argue that this should be the first goal. • The City's 10% inclusionary rate is too low, e.g., Santa Monica, a coastal city of a similar size, has a 30% inclusionary rate. • The Affordable Housing Overlay should only be for projects with a substantial number of lower-income units. Recognition that upzoning without Affordability requirements produces only market-rate housing. 	<p>Comment noted.</p> <p>Housing Element Goals are not necessarily listed in priority order.</p> <p>Details of these programs will be provided when the program is implemented.</p>
	Goal 3 - Provide Housing Assistance	Comment noted.

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	<ul style="list-style-type: none"> • There was strong support for Affordable Housing Trust Fund, including a reliable funding source comparable to the funding from the now-defunct Redevelopment Agency. • In the early discussions of the HEU and AUD programs, there was considerable support for giving priority for new housing to people already living in Santa Barbara or workers who commute from Ventura or North County. This large group is one who should be provided housing assistance and preference. 	
	<p>Goal 5 - Preserve Housing The language of this goal relates only to improving the physical condition of the housing stock, which is important. However, it doesn't speak to:</p> <ul style="list-style-type: none"> • Maximizing the use of existing housing, e.g., pass a vacancy or similar tax on homes that are not occupied at least half the year. This may encourage homeowners to live here most of the year and would raise funds for Affordable housing. • Encouraging Adaptive Reuse of non-residential buildings into housing. • Reducing the existence of short-term rentals and fractional ownership units that reduce the housing supply. Enforcement of existing and future requirements is needed. 	<p>Goal 4 speaks to housing stability including addressing short-term rentals and fractional ownership housing. Adaptive reuse falls under Goal 1.</p>
	<p>Goal 6 - Engage the Community</p> <ul style="list-style-type: none"> • There was support for engaging tenants and other groups whose voices have not been well represented in this process, including coordinating with groups that have the trust of these communities. 	<p>See GR-5.</p>
	<p>Goal 8 - Fund Affordable Housing</p> <ul style="list-style-type: none"> • There was a lot of support for increased funding for Affordable housing. There was also recognition that, if a tax measure of some 	<p>Comment noted.</p>

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	<p>sort were pursued, the lead time to put that in place would be a minimum of two years. It was suggested that a funding analysis be done and a short-term funding strategy be developed.</p>	
<p>Housing Authority of Santa Barbara 07/25/22</p>	<p>In reviewing the suitable sites inventory (Exhibit G of the draft HEU), the list is extensive and probably physically suitable for additional housing, but we question how feasible it would be to acquire and develop units on these sites within the next planning period. For instance, our office is listed and we would most likely not be in a position to add units to this site within the next eight year planning period. There are shopping centers, single family homes, hotels, businesses, etc. that while suitable would most likely not be “available” for redevelopment for housing units. Therefore, under the “Site Status” column in the Suitable Site Inventory, we would like to know how the City is defining the term “Available”. Perhaps some other more relevant term should be used, such as “potential site”.</p>	<p>Suitable sites were selected based on the criteria in the Suitable Sites Inventory Summary. The inventory (Appendix G) is required to be presented on forms provided by HCD, and the Site Status choice is either “Available” meaning available for prospective development, or “Pending Project” meaning an application has been submitted to the City for housing.</p>
	<p>Since the new police station site has been formally set and the design plan for this station is moving forward with construction beginning perhaps in 2024, we would like to see the existing police station, which located at 215 East Figueroa Street to be listed on the Suitable Sites Inventory. This location is perfectly situated for affordable housing.</p>	<p>See GR-2.</p>
	<p>Policy 1.7: Prioritize residential development and community benefit projects on sites zoned for both residential and other uses. The term “community benefit” currently includes any residential rental project whether market rate or affordable. We believe the “community benefit” is ill-defined and should not include all residential development projects. Only residential rentals that provide a 50% or more affordable units at moderate income or below should fall under the community benefit term to receive incentives available to this category, such as increased height limits.</p>	<p>See GR-8.</p>

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	<p>HE-2: La Cumbre Plaza Specific Plan: The Housing Authority encourages the City to include within the specific plan a substantial amount of affordable housing above the current inclusionary requirement – along the lines of the proposed Affordable Housing Overlay. This is one of the last large developable sites for housing that should include a healthy mix of market, middle income, and moderate- and low income housing.</p>	See GR-6.
	<p>HE-4 Facilitate Production of Accessory Dwelling Units (ADUs): Given the tremendous need for housing affordable to low-income households, we encourage the City to develop a program of incentives, such as fee reductions, in exchange for restricting the use of the rental to low-income households for a specific period of time. The Housing Authority is eager to participate in such a program with the City referring our voucher holders to the ADU owners for rentals.</p>	Comment noted. Details of this Program will be further developed once it is initiated.
	<p>Goal #2 – Prioritize Affordable Housing: Prioritize housing that is affordable to the workforce and vulnerable communities, by use of deed restrictions and other measures, over other types of development, with special emphasis on housing that meets the needs of extremely low, very low, low, moderate, and middle income, and special needs households. We agree with the wording of this goal apart from “...and other measures”. The term “other measures” is vague, and we know of no other mechanism to ensure that affordable housing is enforced and remains affordable, other than deed restrictions such as affordable housing covenants. Therefore, we believe that prioritization should be given strictly to deed restricted developments affordable to the City’s workforce (moderate income and below) and other vulnerable residents. If the City does not prioritize deed restricted developments, a developer agreeing to provide a portion of affordable housing may then sell the development, the new owner would</p>	Comment noted.

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	not be obligated to provide the affordability that was agreed to unless there is a recorded covenant that runs with the land and survives future conveyances. We need as much affordable housing as possible and for as long as possible.	
	HE-7: Affordable Housing Overlay - We support an affordable housing overlay to incentivize additional housing units provided to low-income households. The target percentage for the overlay should be well above the inclusionary requirements to receive the overlay benefits.	Comment noted. Details of this Program will be further developed once it is initiated.
	Goal 8 – Fund Affordable Housing: Develop a permanent source of local funding to produce deed-restricted affordable housing. The Housing Authority is very appreciative of the inclusion of this goal and the policy 8.1 and program HE-25. While the City has been, and continues to be, an important funding partner for our affordable housing developments; if as a community we are going to achieve our overarching goals of adequately providing for the affordable housing needs of Santa Barbara, this policy and program need to be at the top of the list and to have a time frame set for implementation.	Comment noted.
Vicki Allen, League of Women Voters of Santa Barbara 07/25/22	Policies 1.7 and 2.1: Clarify the meaning of ‘Community Benefit’ and consider replacing it with ‘Affordable Housing Benefit’. Whatever the term, it needs to be clear that the ONLY way to be eligible for the maximum local incentives such as taller buildings or use of publicly owned land is with a high percent of affordable units of the total built.	See GR-8.
	HE-7 (Goal 1 and 2): “Affordable Housing Overlay” and HE-8 “Inclusionary Housing Evaluation” programs are place holders. We would like to see a timeline and commitment to actions that examine different solutions to incentivize production for the low and moderate income levels.	Comment noted. Timelines for program implementation will be determined prior to release of the final draft.

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	HE-25 (Goal 8) We recommend a completion target of the end of 2023 for the program study “to secure permanent source(s) of funding for affordable housing and renter protections.”	Comment noted.
	We need an emergency ordinance for Rent Stabilization. We need rent stabilization to strengthen the necessary tenant protections to support renters from displacement that can come from increased housing development in our City. As part of that ordinance we hope the City can get started on the Rental Registry for new buildings as suggested by the Planning Commission.	Comment noted.
	We need the City to commit to a short-term funding source that can be used to leverage other monies to fund the Housing Authority’s production and tenant protections such as a right to counsel as recommended in program HE-25 while we wait for progress on Goal 8 Funding Options.	Comment noted.
	A few City-owned parking lots should be identified as “Suitable Sites” for affordable housing so HACSB and non-profit developers can start planning and evaluating project possibilities.	See GR-2.
Lisabeth Pacheco 07/26/22	<p>We ask that City Council prioritize:</p> <ul style="list-style-type: none"> - Goal 2 (Prioritize Affordable Housing) - Goal 3 (Provide Housing Assistance) - Goal 8 (Fund Affordable Housing). <p>Within each of these goals, we ask that City Council direct staff to implement the following programs first:</p> <ul style="list-style-type: none"> - HE-25: Affordable Housing Funding - HE-12: Affordable Housing Trust Fund - HE-13: Support Rental Housing Mediation Program - HE-20: Renters' Rights Information - HE-15: Short Term Vacation Rental Ordinance 	Comment noted.

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The Riviera Association 07/26/22	While we appreciate that the draft plan mentions, albeit parenthetically, that the area of the City designated “high fire zone” shall be excluded from some of the additional density demands, we believe that that exclusion is important enough to receive more emphasis in the final document.	The draft was revised in several locations to emphasize high fire hazard policies.
	We also believe that additional development in environmentally sensitive areas needs to be explicitly excluded.	The suitable sites inventory excluded sites adjacent to creeks, which are considered environmentally sensitive areas.
	From our reading of the draft, we infer that, if adopted, the City will primarily be hoping that additional Accessory Dwelling Units will work toward satisfying the housing needs of our city’s very low, low, and moderate income residents. Given that most ADUs constructed to date are either not being used as rental units at all or, if they are, are being rented at “market rate,” we doubt that ADUs will provide the sought-after solution. We expect that the City will need to invest, perhaps through the Housing Authority and/or other forms of partnership, in additional deed-restricted housing conversion or construction. Indeed, our members strongly expressed their preference that new housing in the city qualify as “affordable” rather than as “market rate.” We fear that in reliance on ADUs will fail to satisfy needs in the “affordable” category.	ADUs are projected to account for approximately 7 percent of the City’s affordable housing needs (Very Low, Low, and Moderate income housing). The estimated total number of ADUs that will be permitted in the next 8 years assumed that 35 percent will not be used as housing and therefore do not count as housing units.
Jacqueline Robinson 07/26/22	We ask that City Council prioritize: - Goal 2 (Prioritize Affordable Housing) - Goal 3 (Provide Housing Assistance) - Goal 8 (Fund Affordable Housing). Within each of these goals, we ask that City Council direct staff to implement the following programs first: - HE-25: Affordable Housing Funding - HE-12: Affordable Housing Trust Fund - HE-13: Support Rental Housing Mediation Program	Comment noted.

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	<ul style="list-style-type: none"> - HE-20: Renters' Rights Information - HE-15: Short Term Vacation Rental Ordinance 	
Paige Sawaya	<p>We ask that City Council prioritize:</p> <ul style="list-style-type: none"> - Goal 2 (Prioritize Affordable Housing) - Goal 3 (Provide Housing Assistance) - Goal 8 (Fund Affordable Housing). <p>Within each of these goals, we ask that City Council direct staff to implement the following programs first:</p> <ul style="list-style-type: none"> - HE-25: Affordable Housing Funding - HE-12: Affordable Housing Trust Fund - HE-13: Support Rental Housing Mediation Program - HE-20: Renters' Rights Information - HE-15: Short Term Vacation Rental Ordinance 	Comment noted.
Theresa Weissglass 07/26/22	I am particularly concerned about the low number allocated to very low to moderate income levels in the Quantifiable Objectives (QO).	See GR-12.
	I strongly support the comments regarding the La Cumbre Plaza Specific Plan. That large property offers the City an excellent opportunity to support creation of truly affordable, model housing mini-community. There are many examples in other cities of such developments.	Comment noted.
	I know how difficult it is for low income families and workers to survive in Santa Barbara and that a substantial percentage of their earnings goes to paying rent--often to the detriment of other basic needs. Yet these workers are needed by local businesses, schools, medical facilities, and nonprofits. It is embarrassing and unacceptable that Santa Barbara, an internationally known city, tolerates a situation where teachers, medical workers, fire and police department members must commute considerable distance due to the lack of affordable housing--whether homes or multi-bedroom	Comment noted.

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	apartments. This will be an increasing problem with negative effects for all of us unless the City takes ongoing action.	
Kristen Miller 07/26/22	It is essential that the City prioritize a wide variety of housing solutions, like HE-6. The Chamber encourages the City to prioritize programs which will incentivize private developers, remove barriers to development, and streamline the City's existing processes. HE-3 and HE-5, which both refer to streamlining the City's design review process, are examples of programs on the right track. While the public sector has seen success in addressing our community's housing needs, the private sector has the resources needed to create housing on the scale we require.	Comment noted.
Mary Jacobs 07/26/22	In my opinion, there is a very real need to reach out and get feedback about housing issues in the city from the less housing secure residents and workers. People everywhere are expressing concern they cannot continue to live in town....unable to find a place to live, afraid their rents will go up more than they can afford and so forth. The council needs to put more effort into hearing from these folks to understand the issues from their perspective.	Comment noted.
	I feel strongly that the city needs to raise the "target goal" for very low, low, and moderate income households (a quantified objective) from 859 units to a higher, more meaningful number. Afterall, the state set a target of 4,969 units and the current goal is only 17 percent of the state target. We will not achieve a meaningful increase in the actual number of such units if we do not set a higher goal and work to achieve it.	See GR-12.
	I fully support the point in the letter from the League of Women Voters regarding Policies 1.7 and 2.1 that the term "Community Benefit" needs to be defined in such a way that the only way to be eligible for the maximum local incentives such as taller buildings or use of publicly owned land is with	See GR-8.

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	a high percent of affordable units of the total built. I like the suggestion that the term “Community Benefit” be replaced with ‘Affordable Housing Benefit’.	
Active Multi-Family/Housing Developers in the City of Santa Barbara 07/26/22	<p>Intent/Goals of the Housing Element Update: We have a unique opportunity to implement what we have learned over the last several years and make significant progress towards straightforward, objective development standards and processes that actually work. To that end we feel this first draft falls short.</p> <p>Only 0.6% of the current housing inventory has been built since 2014 per the information provided in the Housing Element and approximately 22,000 existing residents are between the ages of 5-24. Over the next 8 years it is a fair assumption that a significant number of those individuals will need housing. This excludes any growth or people moving to our city, just the needs of the families that are already here.</p>	Comment noted.
	<p>Suitable Site Analysis: Government Code 65583(a)(6) requires that non-governmental constraints also be analyzed, but the City provides no analysis that shows how “realistic” it is for units to be accommodated on its inventory site. As but one of many examples, the City identifies 39 units of residential housing at 115 South La Cumbre Rd. This property is an operating Chevron Gas Station owned by, or on long-term lease to, Chevron Inc. - - unless the City has had conversations with the property owner where they represented a desire to redevelop the property into residential units in the near term, how can this site be listed as suitable, available, and realistic for 39 units of housing during this RHNA cycle? Unless the City has specific information on this site that is not shared in the Housing Element, we don’t see how this property (and many others) can be placed in the City’s inventory. Other such examples include:</p>	<p>The Draft Housing Element provides an analysis of potential and actual non-governmental constraints, as required by Government Code 65583(a)(6). The suitable sites inventory is completed City-wide and parcels were identified based on HCD guidance, including assumptions of typical built densities and trends based on assessed land value and improvement value to gauge how realistic redevelopment is on a parcel. The City is not typically aware of lease terms or details. Please note that a pre-application was submitted 2840 De la Vina Street since the release of the public review draft that include redevelopment with multiple story residential units.</p> <p>The Housing Accountability Act limits the City’s ability to deny, reduce the density of, or make infeasible housing development</p>

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	<ul style="list-style-type: none"> • 23 South Hope - - Slated for 76 residential units; however, the site is heavily constrained by Arroyo Burro Creek and USS Overlay, which significantly limits the height and imposes parking and setback requirements that we believe prevent development of anything close to 76 units. • 3311 McCaw & 3303 State Street - - Slated for a total of 212 residential units; however, these sites are impacted by USS Overlay and are part of Loreto Plaza, which is likely encumbered by long-term leases and easements that may preclude residential uses. • 2840 De La Vina Street - - Slated for 45 residential units; however, this property is subject to a long-term lease to Grocery Outlet and is also part of a larger shopping center, which likely has restrictions on the conversion of uses, as well as access restrictions. • 217 E Gutierrez - - Slated for 221 residential units, but it has multiple long-term leases. <p>It doesn't seem like the City researched the parcels it placed in its inventory to make sure they are suitable, available and realistic for development. We know other jurisdictions are talking with land owners before including their parcels in the Housing Element inventory, which seems to be more in line with what the Housing Element should reflect. The parcels' development potential value must exceed its existing value otherwise there is no development incentive for the owners. The City can create this incentive through zoning changes and development standards that do not exist today. We had hoped the Housing Element would focus on proactive changes, rather than simply listing parcels, most of which are not suitable, available or realistic for residential development.</p>	<p>projects. The Housing Accountability Act applies to historic properties. The City may apply objective, quantifiable, written development standards, conditions, and policies related to historic preservation, but projects generally cannot be denied unless there is a specific, adverse impact on public health or safety that cannot be feasibly mitigated. For 222 E. Canon Perdido, staff understands that the developer voluntarily removed units from the project.</p>

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	<p>Additionally, any parcel that is subject to the Historic Landmarks Commission (HLC) design board should merit further study about its ability to be developed with high-density. Recently a project at 222 E. Canon Perdido was forced to remove units by the HLC's comments. That parcel size could accommodate nearly 40 units based on zoning density, but is now going to be developed with 27 units. All of which are one-bedroom or smaller. This appears to fly directly in the face of state law that prevents design boards from requiring projects to reduce units.</p>	
	<p>Development Standards: The draft Housing Element includes multiple references to the existing development standards but doesn't say how they will be updated and/or changed to facilitate more housing. For example, the draft Housing Element includes the updated stormwater regulations that inaccurately list tier 1 & 2 projects as "medium" and tier 3 as "large". However, nearly every project over 24 units will be a Tier 4 project, which has extremely difficult standards to hit.</p> <p>Another example is the calculation of net vs gross lot area. Development density is often calculated from "net" lot area. Why shouldn't this be "gross" lot area? If the City's desire is to spur additional housing and meet our RHNA allocation, then let's do away with the complicated equation that determines the number of units allocated to a particular lot that staff and developers often argue over.</p>	<p>The description of the SWMP program was edited in the revised draft to more accurately describe the tiers.</p> <p>Details of the program to remove governmental constraints will be further developed once it is initiated.</p> <p>The Zoning Ordinance considers Net Lot Area for calculating density rather than Gross Lot Area to provide for a consistent intensity of development and visual streetscape. Net Lot Area subtracts existing or proposed public streets and alleys from the development potential of a site. The calculation of Net Lot Area is typically straightforward.</p>
	<p>Economics/Affordability Expectations: The draft Housing Element assigns affordability levels and or potential buildout to sites listed in its inventory without any analysis of the feasibility of developing housing at these affordability levels. The draft Housing Element says the Suitable Sites Inventory considered the "financial viability" of sites based on "assessor parcel improvement value, land value, and parcel area" and "Properties</p>	<p>Comment noted.</p> <p>We acknowledge that not every site identified in the inventory will be developed according to the RHNA income categories. State Housing Law requires the City to identify sites that could accommodate lower income housing based on the suitable sites inventory criteria. The City is also required to ensure that adequate</p>

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	<p>chosen were all within the parameters of projects that were proposed and constructed during the 5th RHNA Cycle.” We don’t see how this is possible given the number of affordable units assigned to every parcel in the Inventory.</p> <p>The “financial viability” of the residential project is not solely based on its assessed value, land value and parcel area. Developers don’t rely on these metrics when considering a residential development project. Residential development is based on market forces, such as construction costs, entitlement timelines, availability of construction financing and desirability of location within the City. None of these factors are considered in the City’s “financial viability” analysis. They need to be.</p> <p>The affordability levels assigned to properties are unrealistic. Most properties listed in the inventory are assigned affordable units at or above 50% of the total unit count. That is financially untenable and completely contradictory to the BAE Study done by the City. The draft Housing Element says that properties listed in the Inventory and the affordability levels assigned to the properties are “within the parameters of projects that were proposed and constructed during the 5th RHNA cycle.” This isn’t consistent with our collective experience developing residential projects in Santa Barbara. The City needs to show how projects proposed and constructed in 5th cycle achieved these levels of affordability. Also, the City can’t assume every development project will be a subsidized low-income housing project like those executed by the City Housing Authority or a private non-profit housing provider. While we know the City has to meet certain affordability levels in its Housing Element, the numbers assigned in the Inventory can’t be supported. The Housing Element also doesn’t acknowledge the City’s current practice of “double dipping” on affordability</p>	<p>sites are maintained throughout the eight year planning period to accommodate remaining RHNA by income category.</p>

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	<p>restrictions through its inclusionary housing requirements. The City already requires developers to provide moderate-income housing for projects in addition to affordable units provided through the State Density Bonus Program. Developers are forced to accommodate two layers of affordability restrictions. The City needs to consider this in its “financial viability” analysis and rethink whether its inclusionary requirement is actually an impediment to housing production at the level contemplated in the Housing Element.</p> <p>Past Council Direction: Past council direction on Housing Element appears to be missing. Previously council has provided a directive to staff to investigate increased density on both sides of Upper State Street and the De La Vina corridor. We had hoped the City would have taken the new Housing Element as an opportunity to analyze and promote ways the City can further encourage housing by looking at its own ordinances and building regulations. This kind of practical analysis didn’t happen. If the City is serious about solving its housing crisis, it needs to look at how its own regulations prevent development.</p>	<p>City Council provided direction to explore upzoning in some areas with a new Floor-to-Lot Area program. The City decided to not pursue this program further. The Affordable Housing Overlay (Program HE-7) is expected to include the Upper State Street corridor and the Upper De la Vina Street corridor, which would allow for additional densities in these areas.</p> <p>Additional rezoning to provide capacity during the planning period would need to be prioritized with the other programs in the Housing Element that the City adopts.</p>
Anne Hubbard 07/28/22	<p>While I understand the need for more housing, especially low-income housing, in the city of Santa Barbara, I am concerned about two specific sections of this plan.</p> <p>The first is on page 2 and the seven elements to consider for the housing plan. I notice that the impact on school districts is not one of the seven elements required, but that there is the ability to add elements. I am urging you to add this element. The city of Santa Barbara has several small elementary school districts. The district I lead, Hope School District, is one of them. We are a district with only 3 campuses, serving about 850 students. A large housing project located in any one of the small</p>	<p>The seven elements listed on page 2 are mandated by state law. Schools are discussed in the Land Use Element.</p>

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	<p>elementary school districts in Santa Barbara like mine could have a significantly negative impact on the district. Even a larger district such as SBUSD, would expect to be part of the consideration process when adding thousands of housing units.</p> <p>The second section I am providing public comment on is on page 86, specifically HE2. This is where the plan notes that La Cumbre Plaza is a potential for housing. This plaza is part of the boundaries for Hope School District. It is noted that there is consideration for the following:</p> <ul style="list-style-type: none"> • Arroyo Burro Creek • public open space • multi-modal circulation • utilities • topography • increased height limits. <p>There is no consideration at all for impact to the school districts serving that area. As I mentioned, Hope School District has only 3 small schools and a housing project with many units (1,900 units has been suggested in the article in the July 28th Independent) on this property would potentially double the enrollment size of our entire district. I am sure that you are aware that the costs of adding classroom spaces, as well as the slow timeline for construction, would be exceptionally prohibitive for the district adding more classroom spaces to accommodate more students. Additionally, Hope School District is a community funded district (based on local property taxes), so there would be no additional per-pupil funding generated by this large increase to enrollment. This would have a hugely negative impact on the budget, class sizes, programs, and quality of education for the students in our schools.</p>	<p>Development fees collected for schools are generally considered adequate mitigation for school impacts, assuming there is enough capacity on the school site for increased enrollment. See GR-6 for more information.</p>

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	<p>Please note these comments and consider a plea to intentionally include school district leaders in any and all discussions about potential mid to large sized housing projects. At the very least, be sure to include the consideration of the impact on local school districts when making these decisions.</p>	
<p>Community Environmental Council 07/28/22</p>	<p>Community Environmental Council has reviewed the draft 2023-2031 Housing Element and generally supports the City's approach to building more housing in the City. We strongly support policies that lead to more affordable infill housing that is sustainable by design, enables residents to live car-free or car-lite lifestyles, and that prioritizes housing Santa Barbara's workforce and correcting the jobs/housing imbalance. We offer the following comments on specific Housing Element Goals:</p> <p>Goal 1 Create New Housing: Create new healthy, safe, and energy-efficient housing that meets community needs, within our resources. SBCAG estimates that tens of thousands of commuters drive to the South Coast from Ventura County and North County Santa Barbara, clogging freeways and leading to significant greenhouse gas emissions. Easing the jobs/housing imbalance is a major priority for sustainability and for local employers. The City should maximize opportunities and incentives for denser, infill multifamily projects that:</p> <ul style="list-style-type: none"> • Are close to transit and active transportation options to prioritize affordable options for residents who want to live car-free or car-lite lifestyles • Incorporate smaller units that are more affordable and sustainable by design • Reduce parking maximums and unbundle parking to minimize the high additional cost that unnecessary parking adds to units Incorporate carsharing where possible 	<p>Comment noted.</p>

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	<ul style="list-style-type: none"> • Focus on all-electric, energy-efficient units that are affordable for residents <p>HE-2: La Cumbre Specific Plan – CEC supports planning elements that maximize housing affordability and ease of transit and active transportation modes. Design that encourages car-centric lifestyles should be avoided.</p> <p>Goal 2 – Prioritize Affordable Housing CEC supports the proposed Affordable Housing Overlay Zone and efforts to encourage development of more affordable housing. While CEC supports the Zone’s lower parking requirements, we would go further and recommend minimal parking be developed, and parking spots to be offered unbundled at market rates. Minimizing parking has a large impact on increasing affordability, and those residents lucky enough to secure subsidized housing should not have their private auto use also subsidized. Affordable developments should prioritize robust transit, active transportation, and carsharing usage.</p>	<p>See GR-6.</p> <p>Comment noted. Details of the Affordable Housing Overlay will be further developed once it is initiated.</p>
John Matis 07/29/22	Any plan upper or lower state needs to crest [sic] community centers, splash parks, family friendly locations for the kids of Santa Barbara County. Our parks have been overran and occupied by homeless and unless you own a home with a yard or insist on packing up for the beach every day there is just a shortage of alternatives for our most precious Human Resources, the children.	Comment noted.
Jean Sedar 07/29/22	Please FIRST prove there is guaranteed water to support this building expansion enough to allow for discontinuing rationing in current homes. Otherwise I don't believe most of your constituents will support these Housing Element plans, regardless of any mandates from Sacramento. I tried to find any mention of water resources in the report for building new housing. The headline 'Environmental Conditions' on page 68 seemed to	<p>Per state law, water and sewer providers must grant priority for service allocations to proposed developments that include housing units affordable to lower-income households.</p> <p>The Program Environmental Impact Report being prepared for the Housing Element will evaluate the City’s water supply and ability to accommodate new housing development up to the year 2035.</p>

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	<p>be the most promising but had nothing. Did I miss something since I didn't read every page?</p> <p>From my interactions with other California, and specifically Santa Barbara area residents, we are at a total loss trying to understand how adding 8,000+ units to our water needs can even be discussed unless we will no longer need, or be mandated, to reduce our water usage on current properties. Please provide clear and guaranteed water supply information in your proposals.</p>	<p>The revised draft includes a discussion about water and sewer capacity.</p>
<p>Kristian Blom 07/29/22</p>	<p>Thank you for your work on housing affordability. It's critical that the city council and other policy makers come to understand the difference between shelter and housing, or housing affordability will never be achieved. Adding more private market housing units relative to public sector units, will drive up housing costs further.</p> <p>Plans like those currently contemplated in the Funk Zone and La Cumbre Plaza will not address the fundamental problem which is that the ratio of private market relative to public sector housing continues to grow. Planners and policy makers must take the time to learn how the real world of finance actually functions in terms of real interest rates and how asset demand, not shelter demand, determines housing prices.</p>	<p>Comment noted.</p>
<p>Charles Faulding 08/01/22</p>	<p>The state is gonna mandate housing which always has then they should also supply funds in order to support the water needs of all those increased individuals. Now we have a limited resource of water and yet we keep out of the housing which is a draw on that resource. Every city on the coast should have its own diesel [sic] plant so that we can leave water in the Central Valley and the Eastern Sierra and Thera [sic] and allow that water to go to farming. The solution to a limited resource is not to hope and pray for a rain and to stop using it government solution should be to obtain the resource needed especially for adding that many people to the San</p>	<p>Comment noted.</p>

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	Barbara area. Every city on the coast should have a diesel plant [sic] at a 100 plus capacity we should build a Philip kuchuma [sic] and allow For overflow so that the sun and the river can flow more often and thus improve the ability for the steel heads to climb the river and repopulate. So the state's gonna mandate housing they need to do something about creating a water and we have an ocean full of it we just need to put the resources there as a state.	
Lisa Carlos 08/02/22	Introduction: I understand the City will be including an executive summary which is a good idea. I would recommend that such a summary include a paragraph that includes an analysis of the Average Unit Density (AUD) program and reflects a more robust analysis of what worked and didn't work with that program, as I've suggested under Appendix A comments below.	The revised draft includes an Executive Summary. The entirety of the 2015 Housing Element was evaluated in Appendix A, of which AUD program was a part.
	Housing Needs Summary/Community Profile:Tables 5-7 in this section reflect 2019 Census data when the 2020 Census data is now available. I recommend updating. Regardless of which data set is used there should be a caveat statement added about how neither the 2018, 19 or 2020 Census data reflect how the pandemic and skyrocketing real estate markets has most likely exacerbated many of the cost burdens faced by lower income households. It's fair to say the most current Census data, therefore, underestimates these cost burdens by an unknown amount.	See GR-10.
	Pp 39-40. This section on "Large Households" makes statements that are confusing and contradictory. The first paragraph under this subsection the data claims large households have trouble finding affordable and adequate housing leading to overcrowding. The third paragraph, however, then states that there is a greater need for smaller units than larger units. Where is this data to support this assertion? This section erroneously cites "Chart 6" which is in another section of the report on page 44 on homelessness.	The data to support the greater need for small units comes from the American Community Survey that shows households of 2-4 persons and single persons comprise 92 percent of all households in the City. The draft was revised to correct the chart reference and clarify the housing needs of large households.

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	<p>Goals, Policies, Programs: Goal 1 - Create More Housing</p> <p>P. 85 - Overall comment on Goal 1: Include a call out box that defines all the terms used in this goal, including “extremely low” to “middle” and special needs populations” to the workforce.</p> <p>P. 85 Overall comment on Goal 1: Throughout add language that incentives should prioritize or be tied to greater levels of affordability whenever possible.</p>	See GR-9.
	<p>P. 85 Comments on policies:</p> <ul style="list-style-type: none"> ● Policy 1.2, Amend to say “Encourage development of housing on infill sites, particularly redevelopment of sites suitable for <u>affordable housing that are not in very high fire zones, including the Foothill and High Foothill zones.</u>” ● Policy 1.4 Amend to say: “Reduce and, where feasible and practical, remove unnecessary City-imposed constraints that impede housing development, <u>especially for affordable housing projects.</u>” ● Policy 1.5 Change word “establish” to the word “consider” for citywide objective design and development standards and add at the end: “<u>that provides special priority to the development of affordable housing.</u>” ● Policy 1.8 Amend to say: “Increase flexibility in multi-unit housing densities and other standards to allow a variety of unit sizes <u>in exchange for greater deed-restricted affordability levels.</u>” ● Add new policy - Policy 1.9: “<u>Avoid harm to people and property by prohibiting whenever possible adding more density to high fire hillsides, especially the Foothill and Extreme High Foothill areas.</u>” 	<p>Comment noted.</p> <p>Policy 1.2 was amended to reference Safety Element policy for high fire hazard areas.</p> <p>Regarding Policy 1.5, the City has already committed to citywide design standards, so “consider” is not an appropriate term. State law already prioritizes objective design standards for affordable housing via Senate Bill 35.</p> <p>Regarding Policy 1.8, additional deed-restricted units may not be the result of the implementing program. Deed-restrictions for fewer units at lower income levels may also be an outcome. Policy 1.8 relates to Goal 1 which pertains to all housing, not just deed-restricted affordable housing.</p>
	<p>P. 86 HE-1: Facilitating Conversion of Nonresidential Buildings to Housing: Adaptive reuse is an environmentally-sustainable approach because a building isn’t torn down and then rebuilt from scratch. If a large building has been empty for a number of years and then is repurposed I also consider</p>	Comment noted.

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	<p>that a community benefit to repurpose it for a residential use. For those two reasons, we should grant for-profit developers the maximum flexibility allowed, which might include providing an in lieu fee instead of on site affordable housing and no open space requirements. I have no changes to this program.</p>	
	<p>P. 86 HE-2: La Cumbre Plaza Specific Plan Given the tremendous opportunity for this site to produce housing across all income levels, this would be a place where incentivizing more market rate housing, including ownership housing in the middle income range, should be encouraged. Given the space, larger affordable rental and ownership for families with four or more people should be considered, e.g., the St. Francis model on California Way. I have no changes to this program.</p>	<p>Comment noted. Details of this Program will be further developed once it is initiated.</p>
	<p>P. 86 HE-3 : Amend the Zoning Ordinance to Reduce Government Constraints and Comply with State Law:</p> <p>1) No Net Loss: This should be put at the top of the list in getting to the Council for a vote. We cannot afford for further displacement. Eighty (80) units of naturally affordable housing were demolished in the 5th cycle and replaced by new unaffordable apartments. No changes.</p> <p>2) Streamline Design Review Process: Time is money too for the nonprofit developers - and their resources are especially precious and should not be wasted. Rewrite to prioritize affordable housing projects developed by the Housing Authority and non-profits going to the front of the line. Amend to say: "Streamline the design review process to reduce the number of hearings and appeal actions for projects especially for deed-restricted affordable housing projects led by the Housing Authority or other non-profits."</p> <p>3) Add a policy to review the "Community Benefits" designation - The City Council already approved that market rate rental projects with just 10%</p>	<p>Details of the program to remove governmental constraints will be further developed once it is initiated.</p> <p>The City already streamlines the approval process for deed-restricted affordable housing and is looking to reduce the number of decisions that are appealable for this housing type.</p> <p>The definition of a "Community Benefit" housing project has not yet been amended by the City Council. Amendments to that definition will be the subject of future public hearings.</p>

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	<p>inclusionary alone are not considered a community benefit for purposes of exceeding the 48 ft height limit.</p> <p>P. 87 HE-4: Facilitate Production of Accessory Dwelling Units (ADUs). Maybe this wasn't the intent, but this section sounds as though ADU's are going to be fast-tracked and encouraged to multiply exponentially in the hopes that they will resolve our affordability problem. Also it was my understanding after speaking with staff that this section was referring to "deed-restricted" ADUs but that isn't specified anywhere in the language and it should be. While it's understandable that the City wants to capitalize on the popularity of ADUs' (especially since other cities are being encouraged by the state to do the same), the City should be clear here or somewhere in the draft of this report about the trade-offs of heading in this direction. Specifically, ADU's do not represent the "gold standard" of affordable housing because to date they are not required to be deed and/or income-restricted. Deed-restricted affordable housing requires an income verification and is legally protected from conversion to a market rate rental for a specific period of time by covenant. By comparison, ADU's "affordability" is short term, dependent on the private owner to determine and not legally required by covenant. The tracking system in HE-11 may be able to address some of the concerns but it will never be a fully satisfactory solution, since ADU's rental status can change overnight. Will the City really be able to track ADU's status on a real time basis? This is highly unlikely. Therefore, if the City intends to designate ADU's as "affordable" for the purposes of meeting its Regional Housing Needs Allocation (RHNA) reporting requirements, then for transparency and ethical reasons, the City should keep ADUs designated as "Above Moderate" or disaggregate housing production data into deed/income-restricted and non-deed/income-restricted categories. (See recommendation on accountability system under</p>	<p>HE-4 was revised to clarify the ADU amendments would not apply in the High Fire Hazard Areas and that deed-restricted affordable ADUs are intended as part of the collaboration with nonprofits.</p>

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	<p>Goal 8, HE-27). Also we should explore subsidy incentive programs to encourage homeowners to build real deed-restricted ADUs, such as the pilot program currently underway in LA County. Given all these issues, make the following language changes and additions:</p> <ul style="list-style-type: none"> ● P. 88 Eliminate the third bullet point “Allow two ADUs above larger garages and carports.” This is too specific for this planning document and may lock us into pursuing a change that is not safe in some areas, such as high fire zones. ● P. 88. Amend the very last sentence on the ADU section which reads: “The City will research and collaborate with community organizations and non-profits to promote ADUs as affordable...” Again, is the City trying to promote market rate ADU’s as “affordable” or is the City trying to promote deed-restricted ADUs? If the later then that should be made explicit. If it’s the former, I object for all the reasons stated above. Furthermore, that sentence then goes on to suggest that the City should “incentivize property owners” to provide services to “low income elderly.” Providing services to low income elderly often requires very specialized and fully ADA compliant building accommodations and, in some instances wrap-around services - is that what the City is really encouraging property owners to do? What happens when an elderly renter becomes very physically or mentally debilitated and unable to pay rent, do they get evicted? It would be better if the City allocated funding for the Housing Authority to build housing for this population since they provide a wide range of services and would provide such services in perpetuity. ● Add the following language if the intent of this section is to simply promote ADUs that are NOT deed-restricted. We need to promote deed-restricted ADU’s so please add: “Develop a pilot program that incentivizes 	

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	deed-restricted ADU's at moderate and low income levels by offering subsidies and other incentives."	
	<p>Goal 2 - Prioritize Affordable Housing P. 90 Goal 2 language. Eliminate "other measures" and "middle income" from this goal. There was a recommendation by some Council members to do so. And staff stated that there were opportunities to refine the language around these goals when they were voted on. "Other measures" have never been defined and this just leaves the door open down the line to have forms of non-deed restricted market rate housing creep back in. And "middle income" is not affordable housing which is traditionally defined as housing below "moderate income" which is no higher than 120% Area Median Income (AMI). Middle is for 120%-160% AMI.</p>	<p>Goal 2 was reviewed and conceptually approved by a majority of the City Council. It carries forward major aspects of an existing goal, which recognizes Middle Income households as part of the City's workforce and a critical missing component of the existing housing stock.</p>
	<p>P. 90 Policy 2.4: Pursue Partnerships on City-Owned Lots. Support this program overall. However, I'd rephrase some language to emphasize affordable housing. Our city lots are a valuable, rare public asset and should be treated as such. City lots should not be developed by for-profit developers as the lead entity – that role should only be for the Housing Authority or another non-profit developer. Change language to add underlined section: "Pursue partnership opportunities with <u>non-profit developers</u> to develop housing projects <u>that are as close as possible to 100% deed-restricted affordable on City-owned sites.</u>"</p>	<p>Policy 2.4 was revised to clarify.</p>
	<p>P. 90 HE-7: Affordable Housing Overlay. This overlay should aim to incentivize affordable housing projects with as much substantial affordable housing as possible. Any concessions on density, height, parking and approvals should only be granted in exchange for building a much greater amount of affordable housing than our 10% inclusionary, and ideally in the 50-100% range but I'm fine with leaving the language vague for now about what "substantially exceed" means. The City should be wary, however, of</p>	<p>Details of the program to create an affordable housing overlay will be further developed once it is initiated.</p> <p>The Government Code requirement for by right approval is distinct from the proposed overlay and was deleted from this program in the revised draft.</p>

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	<p>waiving our local authority outright because of a state edict to allow “by right” approvals. If there is opportunity for the City to further clarify parameters around that process, then the City should do so. Change the second to last sentence to read: “The City will review the Government Code 65583.2(i) to determine how best and to what degree the City should grant “by right” approval to projects with 20% low and very low income housing.”</p>	
	<p>P. 91: HE-8 Inclusionary Housing Ordinance Evaluation: The condo/ownership inclusionary program, mentioned in the first paragraph, serves people who are above “middle income” or above the 120% AMI and fall into the “Above Moderate” RHNA category. This is typically not considered “affordable” housing, even if it may be deed restricted, because it is at too high an income level. That is not to say that people at the “middle income” level don’t struggle to find ideal housing. The issue is that in the 5th Cycle we are on track to surpassing our Above Moderate income level housing but are much farther behind in the below Above Moderate income categories. The last paragraph could be further clarified by adding the following sentence at the end: “<i>Such a revaluation could assess if higher in lieu fees could be substituted for building onsite inclusionary housing on projects with 10 or more units.</i>”</p>	<p>See GR-7.</p>
	<p>P. 92: HE-11 Accessory Dwelling Units Tracking: This tracking system should be informed by and integrated with the accountability program, proposed in Goal 8, HE-27. A much more robust survey process should be developed to ensure that the data is representative and a large enough sample of the total universe of ADU’s. If the City intends to designate ADU’s as “affordable” then there must be a commitment to going back and surveying all ADUs periodically and then recategorizing RHNA numbers accordingly. If the recategorization of RHNA cannot occur then this strategy has some significant hurdles to overcome and must be reconsidered</p>	<p>The report prepared annually for City Council and HCD already requires housing unit outcome to be categorized by income and deed-restricted and restricted and non deed-restricted.</p>

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	altogether. Add sentence at the end: <i>“Data collected from this tracking program will be used to inform the accountability system outlined in HE-27 and to ensure that outcome data can be separated by deed/income-restricted and non-deed/income restricted housing.”</i>	
	<p>Goal 3 - Provide Housing Assistance P. 93 HE-12 Affordable Housing Trust Fund: Add to the bottom a paragraph: <i>“As part of the accountability system outlined in HE-27 the City will report annually the revenue sources for Affordable Housing Trust fund and use quantifiable outcome measures to show how those funds have directly contributed to financial housing assistance, rehabilitation of housing stock and the production of new housing stock.”</i> All data and analysis should be posted online and show how the fund has grown monetarily and made an impact during the entire 8-year cycle. This could be included in my proposed new accountability system in Goal 8, HE-27.</p>	Program HE-X was revised to include an accountability system.
	<p>Goal 4 - Promote Housing Stability P. 94 Add a new policy, 4.X: <i>“Study policies that would encourage greater rent security and provide emergency rental relief to local residents and workers.”</i></p>	Program HE-X and Policy 4.4 were revised to include rent security and emergency relief.
	P. 95 HE-15 - Short-Term Vacation Rental/Hotel Ordinance. Add the following sentence: <i>“Monitoring data on the numbers of legal STRs and illegal STRs that will be included, measured overtime and reported as part of the public accountability system in Goal 8, HE-27.”</i>	Comment noted.
	P. 96 Add new program HE- XX that says: <i>“Rent Security Program for Local Workforce and Residents. Explore and implement policy options for providing greater rent security until our housing production numbers for affordable housing produce closer to our RHNA needs. Such options include rent stabilization and/or rent relief programs where financial relief is provided.”</i>	Comment noted, rent security measures were added to the revised draft.

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	<p>Goal 6 - Educate the Community P. 99 HE- 22: Housing Supply and Affordability Campaign. Add to the bottom of this section: “Regularly update online housing funding, program and production outcome data in easy-to-understand charts that show progress overtime for the public. A glossary will be on the website that defines key terms and concepts, such as deed- or income- restricted affordable housing.”</p>	<p>Housing funding and production information will be tracked and reported via the Housing Production Tracking and Affordable Housing Trust Fund Programs.</p>
	<p>Goal 8 - Fund Affordable Housing P. 102 HE- 25: Affordable Housing Funding: Add to this section after the first sentence. “The City will allocate short-term bridge funding for deed/income-restricted affordable housing until other longer term solutions are in place.” After the second sentence add: “If ballot initiatives or other funding proposals fail, the City should plan for a contingency funding source.” Add sentence at the end: “A financial evaluation of the costs required to meet the City’s RHNA target at the moderate, low and very low income should be conducted to determine how much revenue is required of a permanent funding source to meet those needs.”</p>	<p>Comment noted.</p>
	<p>Add a new program, “HE-27 Implement Affordable Housing Accountability (AHA) System.” As a City we don’t have clear, consistent, and standardized housing production and other housing related data that can be tracked and aggregated overtime. Such data needs to be readily available online to stakeholders and decision-makers alike to inform their policy positions and recommend programmatic corrections. Such an accountability system would not be an added paperwork or data input burden because almost all of it is already collected and regularly updated as part of the City’s ADU statistics dashboard, AUD statistics and Construction Monitor Report system.</p>	<p>Comment noted. Tracking and reporting was added to existing Programs where applicable.</p>

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	<p>P. 102 Add the following language after the new program, HE-27: “The City aims to be as transparent as possible for the public and policymakers by reporting and posting data that shows overtime the City’s progress in achieving its desired housing objectives and outcomes, e.g., building more affordable housing to meet RHNA targets. To the extent possible, the City will consolidate existing data systems that track housing development with other existing and proposed information-tracking related to housing. The City will standardize its definition of different steps in the project approval and construction monitoring process (e.g., pending, permitted, certificate of occupancy) so data can be aggregated and tracked overtime. Much of this data is already collected and/or contained in existing City database systems and are required to be reported to the state in its Annual General Plan Reports. For example. Data gathered by the HE-11 Accessory Dwelling Units Tracking system could also be included, along with monitoring data on short-term rentals, mentioned in HE-15. Other outcome measures to track overtime could be the length of time it takes to approve a project for both market rate projects and non-profit affordable housing projects. The City will report more than annually to the Planning Commission and City Council progress as demonstrated by these quantifiable measures (and not through the Consent Calendar). When data showing progress on RHNA targets is presented, the City will always identify housing production outcomes data by deed-restricted and non-deed restricted housing.”</p>	
	<p>Appendix A: Review of 2015 Housing Element Overall, the biggest concern is that it is written more as a descriptive narrative than an in-depth “evaluation” of the “effectiveness” of Cycle 5’s goals and programs, as required by Housing Element guidelines. This is particularly true when examining the write up on the AUD program.</p>	<p>Appendix A will be reviewed by HCD per the Housing Element Guidelines.</p>

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	<p>Because that AUD program was, until very recently, the City's primary program for building new housing, a review of the strengths and weaknesses of that program would be important for decision-makers to understand. Conducting such an analysis would not require any additional data collection, since much of it is already collected and documented in the General Plan Annual Progress Reports submitted by the City each year to the state's Housing and Community Development Department.</p> <p>For example, the City's own data shows that the AUD program had mixed results. As the data in Chart 2¹ shows above, the AUD program was successful in producing more rental units. However, only the non-profits and Housing Authority created housing units that were affordable at the very low, low and moderate income level. Furthermore, for-profit developers AUD rents which were market rate were much higher than the citywide average rents, as shown in Chart 3 below.</p> <p>The program, therefore, failed to meet its primary objective which was to incentivize more affordable housing. As outlined in the 2011 General Plan Housing Element (p.11), the program was to grant developers greater density, ability to create different sized units, and other conce [sic] with the hope that more affordable housing would be built or "affordable by design." Policymakers who were present and voted on the AUD program when first enacted have also verified that intent was to create affordable housing, not simply increase the supply of rental housing.</p> <p>Despite the fact that the AUD program was one of the top two producers of new construction housing for the city, it is only mentioned briefly a couple of times, including the description in the HEU draft, Table A-1, p. A-19 (see</p>	

¹ The Chart referenced here and Charts and Exhibits referenced thereafter in the comments from Lisa Carlos are not included in this document but are available in the original letter posted online.

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	<p>Exhibit 1 below). Despite the table’s column heading there is no “results or evaluation” that assesses the AUD programs successes and failures. Ironically, the program is listed under policy/program H-11 which states that promoting affordable housing is “the highest priority” while describing a program that did not succeed in incentivizing private developers to produce affordable housing. Rewrite this section to include quantifiable results, e.g. # of units permitted across income levels, and an analysis of why no affordable housing was produced. A discussion of the loss of Redevelopment Authority dollars and the City’s budget constraints may be part of this section.</p>	
	<p>Another section of the table under H14.3, p. A-25, also fails to address directly the claim of “affordable by design,” as seen in Exhibit 2 below. Add to this section a sentence that states: “While the program incentivized new construction of market rate housing, none of it produced by private developers fell into the moderate, low or very low categories (except for what was required in the 10% inclusionary provision).”</p>	<p>The draft was revised to clarify the results of the AUD program.</p>
	<p>In summary, this section would benefit from a retrospective that included more data overtime and further analysis about what worked, what didn’t and why. And some explanation about the unique context of Santa Barbara, e.g., a highly desirable place to live, bounded by sea-level rise and fire-prone hills, a charming downtown with many historic resources, etc. Instead, it simply presents a description about what programs were in place and what occurred.</p> <p>Documenting descriptively what happened is only the first step in analysis. A second critically important step is actually looking at the data and assessing whether program intent and goals were met. Such information is critical to documenting institutional memory about policies that “work or</p>	<p>Comment noted.</p>

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	don't work." Without such a critical analysis, we will repeat mistakes and reinvent the wheel.	
	<p>For those reasons, I recommend that the city add at least one or two paragraphs on the AUD program and lessons learned in the front of Appendix A and have that summary included in the very front of the HEU report as part of an executive summary. I would also like to see at least one summation chart that shows 5th cycle housing production data across RHNA Categories that includes some analytic discussion about the results (as an example, see Chart 4 below but I would add percentages that show how much of our RHNA goals were attained to date that demonstrates the inequality gap). This data has already been tabulated for the 2021 Annual Progress Report and would not require additional work.</p> <p>Ideally, an analysis would try to explain the contributing factors as to why we fell behind in the production of housing at the moderate, low and very low income levels, such as: 1) lack of Redevelopment dollars for deed restricted affordable housing, 2) illegal short term rentals and second homes, 3) an inclusionary provision enacted later in the cycle at and at a low percentage level, 4) an overreliance on free market policies, i.e., financial incentives and deregulating density and building code would yield housing that was "affordable by design", and 4) a pandemic that turned us into a zoomtown which meant our homes and rentals were in high demand by remote workers from all around the world.</p> <p>Finally, a 5th cycle analysis should discuss the impact that the state's growing Accessory Dwelling Unit (ADU) or granny flat program had on housing production in the past 2-3 years, including adding significantly to our above moderate income housing counts. See Chart 4 below, from the City's own data presented in its Annual Progress Reports.</p> <p>Appendix B: Affirmatively Furthering Fair Housing (AFFH)</p>	<p>The revised draft includes an executive summary with a summation chart of the 5th cycle housing element production data.</p> <p>Comment noted.</p> <p>Comment noted.</p>

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	<p>P. B-1 mentions that this section should discuss “contributing factors” that impede AFFH. Just as in Appendix A, we need a critical analysis to be presented about how the lack of funding allocated to produce deed-restricted housing severely limited the affordable housing choices in the last 5th cycle and how critical funding is to meeting our AFFH requirements in the 6th cycle.</p> <p>Therefore I recommend, that the City add a paragraph on why there was less funding in the last cycle (e.g., loss of Redevelopment funds) and how the City plans to rectify that going forward because without funding there really won’t be “fair housing” choices for certain segments of our population.</p>	
<p>AIA Santa Barbara 08/03/22</p>	<p><u>Suitable Sites</u></p> <ul style="list-style-type: none"> • Proposals for projects on the suitable sites designated on the map should be deemed compatible with the neighborhood as long as project proposals are in compliance with zoning requirements • Suitable properties should include City-owned surface parking lots • Public-private collaboration to develop housing on City-owned lots should be encouraged • Suitable sites are limited and owners of property where housing is encouraged might be inflexible, resulting in high land cost • Suitable sites identified for proposed projects downtown are few and there is a current lack of development overall 	<p>Comment noted. See GR-2.</p>
	<p><u>Development Standards</u></p> <ul style="list-style-type: none"> • The AUD program may be the best bet to create as many dwelling units as possible - if the process can be made more predictable • We encourage Planning Commission and City Council to consider modifying the AUD program to increase density allowance, incentivize 	<p>Comment noted. Details of these specific Programs will be further developed once they are initiated.</p>

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	<p>smaller units, unbundle parking and implement parking maximums City-wide</p> <ul style="list-style-type: none"> • City to confirm that all rental projects will continue to be categorized as Community Benefit projects 	
	<p><u>Inclusionary housing units</u></p> <ul style="list-style-type: none"> • Inclusionary housing requirements for lower income levels are perceived by developers as a disincentive to pursue housing projects at all • The cost to provide lower income inclusionary housing requires the market rate units to be more expensive to subsidize the inclusionary (lower cost) housing placing a greater burden on renters of market rate units • The responsibility to subsidize affordable housing should fall to the entire community - a voucher program should be investigated and might be more effective • Input is needed from developers to determine whether 10% inclusionary would be more feasible if extra rental units would be provided rather than replacing market rate units – in other words, inclusionary units could be in addition to AUD density-allowed units in a form of bonus density, similar to that offered by the State 	<p>See GR-7.</p>
	<p>Entitlement Process</p> <ul style="list-style-type: none"> • Uncertainty and unpredictability in the approval process, coupled with inclusionary requirements, frequently results in no development • Developers purchase property before entering the entitlement process resulting in too much risk and, ultimately, no development • Planning & Development and the Community need to commit to supporting housing through a predictable entitlement process that supports developers' investment and creates dwelling units for all income levels in our community. 	<p>Comment noted. Details of the program to remove governmental constraints will be further developed once it is initiated.</p>

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	<ul style="list-style-type: none"> • We encourage appointing a dedicated staff housing advocate for project processing and approval to support the creation of as many dwelling units as possible to meet RHNA numbers. • Policies that restrict or remove units from proposed projects should be changed or eliminated. • City zoning standards should be considered objectively to improve the predictability needed for developers to anticipate allowed project development and cost. • City zoning standards control size, bulk, and scale of a project while the design review boards and Objective Design Standards (ODS) influence the design aesthetic. These 2 instruments address neighborhood compatibility. If a proposed project meets the required zoning and ODS, the project should be deemed compatible and approved in a streamlined process. • If the established zoning allows size, bulk, and scale that is not considered the desired compatibility, the zoning should be changed – the bottom line...zoning criteria should be objective in application and not subject to reduction in the design review process 	
	<p><u>Adaptive Re-use</u></p> <ul style="list-style-type: none"> • An Adaptive Reuse ordinance is needed to help facilitate and realize housing by repurposing existing buildings • Housing should be allowed to fill the entire building just as commercial uses can, and not be limited by AUD maximums applicable to new construction 	<p>Comment noted. Adopting an adaptive re-use ordinance is proposed in Program HE-1.</p>
<p>Harry & Jenny Bruell 08/03/22</p>	<p>Overlay Zone Section and Goal 1: Create New Housing The Housing Elements mentions that there are 12 Overlay Zones. We would strongly advocate for a Funk Zone Overlay Zone or Neighborhood Plan that would provide a road map for how to incorporate more affordable housing in the Funk Zone while protecting the character of the</p>	<p>Comment noted. Many of these suggestions are beyond the scope of a Housing Element.</p>

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	neighborhood and preserving long standing uses that serve visitors, facilitate public recreation, and support the art and commercial fishing industries. Elements such as affordable live/work art spaces, requirements for adaptive re-use of existing buildings using Funk Zone area specific objective design standards, fully parked new residential and commercial development, incentives for preserving exiting ocean-oriented uses, and preservation of green spaces would help maintain the character and vitality of the Funk Zone.	A separate work effort to develop and submit a Local Coastal Program Amendment to the California Coastal Commission is necessary to establish a Funk Zone Overlay or Neighborhood Plan.
	Goal 2 – Prioritize Affordable Housing We suggest that the City explore the ability to have all additional density be price restricted in perpetuity to low and low-moderate families to the greatest extent legally possible.	Comment noted.
	Goal 4 – Promote Housing Stability We suggest that the City consider prohibiting the conversion of any new housing in the Coastal Zone to short-term rentals.	Comment noted. Details of this Program will be further developed once it is initiated.
	Goal 6 – Engage the Community While this section includes several great information outreach and education elements, it does not include any mention of gathering, considering, and responding to feedback from the community. We would like to see the plan address how the City plans to ensure community feedback early in a project’s process, especially as it considers streamlining processes for developers.	Details of the program to remove governmental constraints will be further developed once it is initiated, and discussed at several public hearings.
	Suitable Sites Inventory Listing: On page 80, in the Suitable Sites Inventory Summary section it states that the Suitable Sites Inventory (Appendix G) identifies the buildout potential of vacant and underdeveloped parcels. It continues to say that the following criteria were used to identify suitable sites and development potential. One of the criteria is: Realistic buildout densities were determined based on average densities of projects approved during the 5th RHNA Cycle.	See GR-13.

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	<ul style="list-style-type: none"> • For Medium-High density (max 27 units/acre), 22 units/acre was used. • For Priority Housing Overlay (max 63 units/acre), 59 units/acre was used. • For multi-unit residential in the Coastal Zone, 20 units/acre was used. <p>If 20 units/acre was used to determine realistic buildout densities in the Coastal Zone and 27 units/acre were used for medium-density, how is the 121 E. Mason Street 2.1 acre pending project in the Funk Zone listed as having a total capacity of 155? Its base density is only 57. This greatly exceeds what is available through the State Bonus Density Law and seems to be incompatible with the City's zoning laws.</p>	
	<p>As residents of the Funk Zone, we can attest that the neighborhood would not be able to handle that size of a development and that it would forever change the character of the Funk Zone, negatively impacting its vitality. Businesses, residents, customers, and tourist all struggle to find parking. Congestion makes it hard to enter and leave the neighborhood easily. Many of the buildings in the Funk Zone are not more than two or three stories tall and have had their uses adapted, creating an interesting and vibrant community. Additionally, the Funk Zone is not near a local transportation hub or rapid transit station, virtually requiring a car to get to work, school, medical facilities, the grocery store, or other essential amenities.</p>	<p>See GR-13.</p>

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	<p>The Funk Zone is also an important tourist and local destination. Its vitality is important to our city. Numerous businesses, including Hotel California and Hotel Milo, advertise the Funk Zone on their websites.</p> <p>The Funk Zone Map, a project of the Arts Collective, website describes the Funk Zone as: “a unique Santa Barbara arts, culture, business, and industrial district between State Street and Garden Street, and Montecito Street to Cabrillo Boulevard. This amalgamation of historical marine structures, industrial lots, and houses has a unique history in manufacturing, lumber, citrus, produce, and fishing. Over the years, many artists have found creative freedom by carving out studio spaces in this “funky” area of Santa Barbara, and so have wineries, restaurants, art galleries, and shops.”</p> <p>It is also important to state that the 121 E. Mason Street project, SOMO Funk development, is at the very beginning of its review process. The ABR received over 150 written comments, with more than 98% opposed to the development, and over 20 speakers voiced their objections at last month’s ABR meeting. It does not seem like it is accurate to include this development at 155 units – a level that exceeds the City’s own standards – before the community has had a full opportunity to weigh in before the Planning Commission and City Council.</p> <p>We respectfully request that the City reduce the densities proposed in the Suitable Sites inventory for 121 E. Mason to correlate to the base density of the site.</p>	
Maricela Morales (CAUSE)	H-13- Rental Housing Mediation Program: The Rental Housing Mediation Program needs to be strengthened through the introduction of a Right to Counsel program. A comprehensive Right to Counsel program would	Comment noted.

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08/03/22	<p>assure that tenants facing housing insecurity are able to access legal assistance through the Unlawful Detainer process. Right to Counsel not only offers tenants a respite from an overtly intimidating legal procedure, but it also relieves pressure from legal institutions. Santa Barbara’s commitment to fund a Right to Counsel program would mark a decisive step towards legal equity and justice for our most vulnerable populations- especially monolingual Spanish-speaking tenants who face multiple barriers when navigating through the technicalities of an Unlawful Detainer case.</p>	
	<p>H-14- Right to First Refusal. A tenant’s right to First Refusal may allow tenants to access homeownership. TOPAs and COPAs are growing popular tools to address the Housing Crisis. The program may be strengthened if coupled with program H-12- the Affordable Housing Trust Fund to provide assistance to first-time homebuyer assistance to low-income tenants and funding for Community Land Trusts (CLTs), the Housing Authority, or non-profit organizations.</p>	<p>Comment noted. The City’s existing condominium conversion ordinance provides a tenant the first right to purchase a converted unit.</p>
	<p>CAUSE also expresses our continued support for rent stabilization and a rent registry. We need rent stabilization to support renters from displacement that can come from increased housing development and speculation in our city. In addition, we support a Rental Registry for the city to help manage and fund the program.</p>	<p>Comment noted.</p>
	<p>We ask that the City Council consider these programs by the end of 2023 to meet the urgency of our housing crisis. To make sure that these programs are successful, we ask that the City commit to research and implementation of these programs by identifying funding sources- as outlined under Goal 8- by the end of 2023 (we especially encourage the city to implement the progressive real estate documentary transfer tax,</p>	<p>Comment noted.</p>

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	vacancy/empty land tax, out-of-state transaction tax, transient occupancy tax, or speculation/flipping tax.) Evaluation of funding sources by the end of 2023 would allow any necessary ballot initiatives to be placed before the voters during the 2024 general election to come into effect in 2025, allowing funding to be used to achieve goals during this Housing Element cycle. These funding sources could be used to fund the Housing Authority's production and tenant protections such as a right to counsel.	
	<p>HE-4 and HE-11 Accessory Dwelling Units: We believe Accessory Dwelling Units benefit multigenerational households and can be beneficial to low-income tenants. Although construction of ADUs can provide benefits for these residents, we have concerns over the implication of affordability for these units.</p> <p>1. ADUs are not guaranteed to be affordable. Although CAUSE supports the development of ADUs, we are wary of automatically designating ADUs as affordable units without any policies to actually ensure their affordability. In order to count towards the lower income RHNA targets, ADUs should have a restricted deed or enforcement mechanism that can be monitored. The city must use its proposed monitoring program- HE-11- to remove ADUs from fulfilling low-income RHNA goals if a unit's rent surpasses the low-income rent threshold. Additional sites must be designated for affordable housing development when ADUs are removed from the low-income RHNA totals.</p> <p>2. We request that the City restrict the use of ADUs as short-term vacation rentals since these properties would not add units to the rental stock and would, instead, further aggravate the rental supply shortage.</p>	<p>See GR-11. ADUs are currently not allowed to be used as short-term rentals per the ordinance and provisions of the ADU covenants.</p>
	CAUSE is in support of program HE-7 the Affordable Housing Overlay. We believe that Affordable Housing should be created in High Resource/Opportunity areas, not only in traditional working-class	Comment noted. Details of this Program will be further developed once it is initiated.

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	neighborhoods. This would allow the City to fulfill HCD's goal of Affirmatively Furthering Fair Housing (AFFH). Placing Affordable Housing projects only in working-class and low-income neighborhoods widens Santa Barbara's inequality gap and economically segregates neighborhoods.	
DSA Santa Barbara Housing Committee 08/03/22	Housing Element: Goal 2 (p. 90) DSA Position: Prioritize Housing for Very Low Income Workers As stated in the Housing Element, the need for housing for the lowest and poorest in the city should be prioritized over and above any new housing for other income levels. Our city depends on the labor of low income workers to exist and it is only moral that the city in return enable low income workers to live in safe and "affordable" homes. "Affordable" has to mean that no person or worker will pay more than one third of their net salary for housing.	Comment noted.
	Housing Element: Goal 3 DSA Position: Tripling housing assistance for low income and disabled and extending the covenants for another decade.	Comment noted.
	Housing Element: Homelessness DSA Position: Santa Barbara should build and provide permanent, safe housing for the existing homeless population. Funds can be raised from a tax on buyer transactions on sales from houses purchased over \$10 million.	Comment noted.

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Eddie Harris 08/03/22	<p>There is also a pressing need to protect creek resources and, where feasible, to correct actions taken in the past that have harmed Santa Barbara's natural environment. That need is addressed in another element of the city's General Plan, the Environmental Resources (ER) element. ER Section 2.4 cites the need for creek restoration and specifically identifies the concretized section of Arroyo Burro Creek, within the La Cumbre Plaza complex of properties, as a priority site for restoration.</p> <p>General Plan section ER 21.3 calls for removal of concrete from creeks where feasible. The City's Creeks Division hired a consulting firm for the purpose of determining feasibility of naturalizing this section of Arroyo Burro creek. That study concluded that removal of concrete and naturalization of the channel at this priority site is feasible.</p> <p>Comprehensive planning for multiple community objectives requires that elements of the General Plan be integrated into process and land use deliberations. The Environmental resources Element should inform the Housing Element. So I am suggesting that the Housing Element be written to include clear reference to those sections of the Environmental Resources Element that emphasize the need and the real potential for naturalizing this concretized section of creek.</p>	<p>Comment noted. See GR-6.</p> <p>All elements of the General Plan and their policies are considered when developing/amending ordinances and guidelines and making land use decisions.</p>
James Rodgers 08/03/22	<p>As a resident of the Funk Zone neighborhood, I support additional housing opportunities to be created in the area, but would like to see the following elements incorporated into the housing element and city planning documents to achieve these goals:</p> <ol style="list-style-type: none"> 1) Require adaptive re-use of existing buildings to the greatest extent feasible through the use of Funk Zone area specific objective design standards. 2) Prioritize additional housing for the low and low-moderate workforce, with preferences given to people who work in the immediate area. 	<p>Comment noted. Some of these suggestions are beyond the scope of a Housing Element.</p> <p>Details of specific Programs mentioned will be further developed once they are initiated.</p>

Name of Sender/Date Received	Comment	Response
	<p>3) Prioritize live/work art spaces to support the art community in the Funk Zone.</p> <p>4) Require preservation/replacement of existing vegetation and garden/open space areas (no net loss of green space).</p> <p>5) Prohibit the conversion of any new housing in the Coastal Zone to short-term rentals.</p> <p>6) Additional “density” should be limited to that which is required by State Bonus Density Law, and should be price restricted in perpetuity to low and low-moderate families to the greatest extent legally possible.</p>	
James Rodgers	<p>The Funk Zone neighborhood is formed by an eclectic group of artists, residents and small local businesses owners that pride themselves in creating an environment that surrounding residents and tourists visit regularly. The highly popular area of the city currently suffers from a lack of parking. New housing and commercial development must provide sufficient parking. And as it exists today as a creative and enjoyable space, the Funk Zone lacks many amenities necessary for residential convenience. Key features that facilitate car-free living such as proximity to public schools, local transportation hubs, and grocery stores and many other necessary amenities are not located within walking distance. New development, both commercial and residential should be required to be “fully parked.” Underground parking is also not a long-term viable solution in this area due to sea level rise.</p>	<p>Comment noted.</p> <p>Coastal Land Use Policy 3.1-29 requires development in the Coastal Zone to provide parking consistent with the Zoning Ordinance.</p>
	<p>Reduce the number of units proposed in the Suitable Sites Inventory to base density.</p> <p>I was very surprised to learn that the proposed Suitable Sites Inventory includes the residential component of the proposed 155 unit (“SOMOfunk”) mixed-use project which would demolish an entire City block and</p>	<p>See GR-13.</p>

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	<p>completely transform the Funk Zone’s unique character for a bare minimum of affordable housing units.</p> <p>We all know our community is experiencing a housing crisis. The Housing Element should focus more directly on addressing that need and consider denser development in areas that have the infrastructure and facilities to support the higher densities. The Funk Zone is ill equipped for the over-the-top density SOMOfunk is proposing. Workforce housing is needed and is appropriate but should be tailored to meet the needs of the artist community that has enriched and enlivened the Funk Zone and the employees of Funk Zone local businesses.</p> <p>I support applying a housing density of 20 units per acre as a reasonable realistic building potential for this site, or at a maximum, 57 units, the allowable base density for the site.</p> <p>If allowed to go forward, SOMOfunk’s 155 units will likely be largely owned or rented as second homes/weekend homes and only partially occupied while irrevocably altering the unique character of the Funk Zone, eventually impugning its vitality as an interesting and worthy neighborhood in the Santa Barbara. I respectfully ask that the City reduce the densities proposed in the Suitable Sites inventory to correlate to the base density of this site.</p>	
<p>Keep the Funk, Inc. 08/03/22</p>	<p>1) Require adaptive re-use of existing buildings to the greatest extent feasible through the use of Funk Zone area specific objective design standards.</p> <p>2) Prioritize additional housing for the low and low-moderate workforce, with preferences given to people who work in the immediate area.</p>	<p>Comment noted. Some of these suggestions are beyond the scope of a Housing Element.</p> <p>Details of specific Programs mentioned will be further developed once they are initiated.</p>

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	<p>3) Prioritize live/work art spaces to support the art community in the Funk Zone.</p> <p>4) Require preservation/replacement of existing vegetation and garden/open space areas (no net loss of green space).</p> <p>5) Prohibit the conversion of any new housing in the Coastal Zone to short-term rentals.</p> <p>6) Additional “density” should be limited to that which is required by State Bonus Density Law, and should be price restricted in perpetuity to low and low-moderate families to the greatest extent legally possible.</p>	
	<p>We support Goal 6 of the Draft Housing Element “engaging the community” but feel the language of the goal and associated policies and programs should include soliciting feedback from the community early in the planning process for new housing projects.</p> <p>To gain acceptance of increased housing opportunities, the city must do more than a one-way program to “educate” existing residents about the need for additional housing; the city must engage residents early in the process, in a dialogue about how to accomplish multiple goals. We feel that the fastest way to creating additional affordable housing in the City is by working with residents and business owners to create a neighborhood plan and/or develop area specific objective design guidelines for development.</p>	<p>Comment noted.</p> <p>Details of specific Programs mentioned will be further developed once they are initiated, and discussed at several public hearings.</p>
	<p>The highly popular area of the city currently suffers from a lack of parking. New housing and commercial development must provide sufficient parking. While a fun, creative and enjoyable space, the Funk Zone lacks many amenities necessary for residential convenience. Key features that facilitate car-free living such as proximity to public schools, local</p>	<p>Comment noted.</p> <p>Coastal Land Use Policy 3.1-29 requires development in the Coastal Zone to provide parking consistent with the Zoning Ordinance.</p>

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	<p>transportation hubs, and grocery stores and many other necessary amenities are not located within walking distance.</p> <p>The recent abandonment of the waterfront shuttle, and changes to bus routes by MTD demonstrates that buses and similar types of alternative transportation solutions are not reliable long-term solutions. Valet parking is also not a viable solution over time. New development, both commercial and residential should be required to be “fully parked.” Underground parking is also not a long-term viable solution in this area due to sea level rise.</p>	
	<p>Specific Project of Concern/Request for change to Housing Element Draft:</p> <p>Reduce the number of units proposed in the Suitable Sites Inventory to base density.</p> <p>We were very surprised to learn that the proposed Suitable Sites Inventory includes the residential component of the proposed 155 unit (“SoMo Funk”) mixed-use project which would level an entire City block and completely transform the Funk Zone’s unique character for a bare-minimum of affordable housing units. This proposal is just a Developer’s Dream – not a realistic project; the application has not even been deemed complete by city staff.</p> <p>We all know our community is experiencing a housing crisis, which is particularly harming community members of low economic means. The Housing Element should focus more directly on addressing that need and consider denser development in areas that have the infrastructure and facilities to support the higher densities. The Funk Zone is ill equipped for the over-the-top density SoMo Funk is proposing. Workforce housing is</p>	<p>See GR-13.</p>

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	<p>needed and is appropriate but should be tailored to meet the needs of the artist community that has enriched and enlivened the Funk Zone and the employees of Funk Zone businesses.</p> <p>KTF supports applying a housing density of 20 units per acre as a reasonable realistic building potential for this site, or at a maximum, 57 units, the allowable base density for the site. KTF supports the requirement that all SoMo Funk housing be affordable, but in any case, the total development should not exceed what is allowable under State Density Bonus law and currently applicable City ordinance.</p> <p>If allowed to go forward, SoMo Funk’s 155 units will likely be largely owned or rented as second homes/weekend homes and only partially occupied while irrevocably altering the unique character of the Funk Zone, eventually impugning its vitality as an interesting and worthy neighborhood in the Santa Barbara. Keep the Funk respectfully asks that the City reduce the densities proposed in the Suitable Sites inventory to correlate to the base density of this site.</p>	
Karl Kras 08/03/22	<p>Overlay Zone Section and Goal 1: Create New Housing</p> <p>The Housing Elements mentions that there are 12 Overlay Zones. We would strongly advocate for a Funk Zone Overlay Zone or Neighborhood Plan that would provide a road map for how to incorporate more affordable housing in the Funk Zone while protecting the character of the neighborhood and preserving long standing uses that serve visitors, facilitate public recreation, and support the art and commercial fishing industries. Elements such as affordable live/work art spaces, requirements for adaptive re-use of existing buildings using Funk Zone area specific objective design standards, fully parked new residential and commercial</p>	<p>Comment noted. Many of these suggestions are beyond the scope of a Housing Element.</p> <p>A separate work effort to develop and submit a Local Coastal Program Amendment to the California Coastal Commission is necessary to establish a Funk Zone Overlay or Neighborhood Plan.</p>

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	development, incentives for preserving exiting ocean-oriented uses, and preservation of green spaces would help maintain the character and vitality of the Funk Zone.	
	Prioritize additional housing for the low and low-moderate workforce, with preferences given to people who work in the immediate area. We suggest that the City explore the ability to have all additional density be price restricted in perpetuity to low and low-moderate families to the greatest extent legally possible.	Comment noted.
	In order for new housing to maintain neighborhood capability, priority should be for residents who work in the area, with mandated accountability to oversee this from the City. There should also be preservation of current open/green space in which makes the Funk Zone the thriving resident and tourist alike destination it is today.	Comment noted.
	Promote housing stability. We suggest that the city consider prohibiting the conversation of any new housing in the Coastal Zone to short-term rentals. There is a plethora of hotels in the area to meet the needs of visitors, and any housing being proposed should be dedicated to residents.	See GR-3.
	The Funk Zone Map, a project of the Arts Collective, website describes the Funk Zone as: “a unique Santa Barbara arts, culture, business, and industrial district between State Street and Garden Street, and Montecito Street to Cabrillo Boulevard. This amalgamation of historical marine structures, industrial lots, and houses has a unique history in manufacturing, lumber, citrus, produce, and fishing. Over the years, many artists have found creative freedom by carving out studio spaces in this “funky” area of Santa Barbara, and so have wineries, restaurants, art galleries, and shops.”	See GR-13.

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	<p>It is also important to state that the 121 E. Mason Street project, SOMO Funk development, is at the very beginning of its review process. The ABR received over 160 written comments, with more than 98% opposed to the development, and over 20 speakers voiced their objections at last month's ABR meeting. It does not seem like it is accurate to include this development at 155 units – a level that exceeds the City's own standards – before the community has had a full opportunity to weigh in before the Planning Commission and City Council.</p> <p>We respectfully request that the City reduce the densities proposed in the Suitable Sites inventory for 121 E. Mason to correlate to the base density of the site.</p>	
Layne Wheeler 08/03/22	I want to add my comment to the process for the draft housing element regarding the potential placement of 1900 housing units at the La Cumbre Plaza site. In my opinion, adding ANY housing to this property site will be extremely detrimental to the upper State Street/US 101 corridor. No amount of mitigation can or will relieve the potential traffic impact caused by adding housing to this site. Over the last several years, the upper State Street corridor has had multiple housing units without sufficient mitigation of traffic. This practice CANNOT continue to occur. Please include me on any planning input that will occur on this process. As citizens of Santa Barbara, we cannot allow any more traffic disasters like we have seen on State Street like that one that occurs daily at Chick-Fil-A.	See GR-6.
Margaret Weiss 08/03/22	I write to express my appreciation for your efforts to address affordable housing in the City of Santa Barbara as part of the Housing Element. Further, I encourage you to set a specific goal related to the needs of older adults and the disabled by prioritizing housing that is not only affordable but also accessible and with supportive services for elders and the disabled.	Goal 2 speaks to prioritizing affordable housing for special needs households, which includes seniors and people with disabilities. The housing types mentioned in paragraph 2 are allowed in most residential zones per the City's Zoning Ordinance.

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	<p>This enhancement will help the plan to be useful and sustainable in the long term as it will meet the needs of our aging population.</p> <p>In my career of more than 30 years in health care, it was too often true that people were left without affordable or adequate housing to meet their needs as they aged. I saw this impact their ability to care for their own health and to remain safely in the community. To address this problem, a comprehensive Housing Element can include a continuum of options from independent living, to independent living with aging related services, assisted living, assisted living memory care, residential care, mental health residential care, and skilled nursing facilities.</p> <p>We all have elder relatives and friends. We do not want them to be stranded or homeless, unable to remain in their home that is no longer affordable or no longer meets their needs. We don't want them to be forced to move away, far from those who care about them. Please make the needs of elders and disabled a goal of the Housing Element allowing for the access and support that is essential. Thank you for your consideration.</p>	
<p>MCP Santa Barbara LLC 08/03/22</p>	<p>We are the owners of 3805 State Street and 110 South Hope (APNs 051-010-012,13,14). La Cumbre Plaza and our parcels have been identified as critical sites for the forthcoming Housing Element. State law requires the City to prepare a Housing Element that identifies adequate sites for housing and makes adequate provision for the existing and projected needs of all economic segments of the community. The Housing Element must include an inventory of land suitable and available for residential development that has a realistic and demonstrated potential for redevelopment during the planning period. When assigning future residential units to parcels through the Suitable Sites Inventory, the City</p>	<p>Comment noted.</p>

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	<p>must analyze potential and actual government constraints that would prevent or hinder the development of units at the assigned density. For sites that are not vacant and listed in the City's inventory, the City must explain how it determined the development potential for the property, including an analysis of market conditions and any existing leases or contracts that would perpetuate the existing use or prevent redevelopment of the site. When necessary, the Housing Element must include programs to amend adopted development standards and policies that inhibit or prevent residential development at the densities and income levels assigned in the housing inventory.</p>	
	<p>The City's analysis of La Cumbre Plaza in the draft Housing Element fails to meet the state-mandated requirements for a valid Housing Element. La Cumbre Plaza is comprised of 4 legal parcels owned by 4 different ownership groups with approximately 90% being owned by our group and the Sears property owner. The property operates as a regional shopping center that includes national chains, small local business, restaurants, and a grocery store. Nearly all of La Cumbre Plaza is ground leased to a variety of different users, who in turn sublease portions of La Cumbre Plaza to subtenants. The term of the leases and subleases at La Cumbre Plaza range from a few years to several decades. The draft Housing Element assigns "approximately 1,900" residential units to La Cumbre Plaza. However, the Housing Element fails to explain how La Cumbre Plaza has a "realistic and demonstrated potential" for redevelopment and the addition of 1,900 units within the 6th cycle. Several of the parcels within La Cumbre Plaza are subject to long-term leases that extend well beyond the Housing Element's planning cycle. We fail to see how the draft Housing Element concludes the development and delivery of approximately 1,900 units is realistic simply based on the existing leases and subleases. We own 3805</p>	<p>See GR-6.</p> <p>The suitable sites inventory includes a group of parcels that can accommodate a portion of the City's RHNA that could have the potential for new residential development during the eight year housing element planning period. Staff has met with representatives for the ownership of the parcels who have expressed clear intention to begin developing units on this unique, large site. Lease agreements are not typically shared with the City. The developer requested that the City analyze impacts of 2,000 units on the site as part of the environmental review for the safety element. HE-2 calls for a La Cumbre Planning Area effort that would explicitly consider site constraints and development regulation changes. The details of those changes are not yet known. The anticipated densities for these parcels is consistent with equivalent zoning in the City for the Suitable Sites Inventory and no additional density is expected to be needed due to physical constraints of the site.</p>

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	<p>State Street, which is currently leased to Macy's, and 110 South Hope which is leased to Macerich (the mall operator). The City Inventory assigns 514 units to our Macy's property. Our property is subject to the Upper State Street guidelines ("USS"). The USS guidelines impose significant constraints on the redevelopment of La Cumbre Plaza, including height restrictions, setbacks, parking requirements and architectural requirements that prevent development at the density allowed by the current zoning. We have worked with a team of architects, designers, and consultants to come up with a design that could accommodate 514 units under the existing zoning and building regulations and we can say with certainty that 514 units cannot be built on our property without relying on state laws. The 45' height limitation alone prevents any real density at the property as it eliminates the ability to construct more than 3-stories. Additionally, this would be a substantial reduction of height from the current Macy's structure which is approximately 75 feet tall measured from the street elevation. The architectural requirements, setbacks and calculation of "net" lot area rather than "gross" lot area for density calculations make it physically impossible to construct anything close to 514 units. We assume the same is true for the "Sears parcel", which is the other large parcel at La Cumbre Plaza. The City must address these site constraints through the Housing Element update. City staff acknowledged these government-imposed constraints at the City Council hearing, but provided no firm solution or path forward to address them.</p>	
	<p>The Housing Element states a Specific Plan will be prepared for La Cumbre Plaza- no time table is proposed and no identified funding source is provided. An unfunded planning exercise with an infinite timeframe will not produce housing within the next 8 years. The City has had over a decade to prepare a Specific Plan for La Cumbre and hasn't done it. The average</p>	<p>See GR-6.</p>

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	<p>Specific Plan prepared by the City takes years— well beyond the 6th cycle. If the City wants housing, a specific plan is not the way to do it. At the last City Council meeting held on July 26th, 2022, City staff represented to Council that the owners of La Cumbre Plaza are interested in a specific plan prepared by the City. That is not true. We have had several meetings with City staff and have repeatedly said a City-led specific plan will only delay housing production at La Cumbre Plaza. Past city history of specific plans already shows that each one is a 5-10 year process and there is no identified funding source to get started. Instead of initiating a specific plan, we believe the City should focus on revising the current building regulations within the USS that prevent meaningful housing development on properties throughout the Upper State Street area, not just La Cumbre Plaza. If the City wants housing at La Cumbre it needs to address the specific zoning and building impediments, not take on another time consuming planning exercise through a Specific Plan— we don't have time to wait.</p>	
	<p>The Housing Element table shows that approximately 45% of the property [La Cumbre Plaza] is slated for affordable, deed restricted housing. We do not understand how the city has come to this conclusion. Even with the highest level of State Housing Density Bonus, we would not achieve this amount of affordability. Additionally, it is completely economically infeasible to provide that level of deed restricted affordability for any private developer.</p>	<p>The suitable sites inventory is required to specify whether a site or portion of a site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing and a realistic capacity of the site. There is no requirement to construct any affordable housing not required by code. The inventory identifies what would be physically possible. This level of affordability would not be economically feasible without substantial subsidy and is not expected. Most other large sites in the City were identified to be suitable to accommodate 100% deed-restricted affordable housing. Because large-scale residential development is expected in the La Cumbre Plaza Planning Area, a smaller level of affordability was identified here than in the Suitable Sites Inventory because adequate sites must be maintained</p>

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		throughout the planning period to accommodate each affordable housing income category.
3850 State Street Owner LLC 8/3/22	<p>We are the owners of 3850 State Street. Our property is across the street from La Cumbre Plaza and currently developed and operating as a Best Western-branded hotel. Please accept the following comments regarding the draft Housing Element as presented to Council on July 26th.</p> <p>3850 State Street Specific Comments:</p> <p>Our property is subject to the Upper State Street Area Zone (USS), which “has more restrictive standards than other areas of the City.” (Housing Element, p. 51). The USS significantly limits height, imposes greater setbacks and sidewalk dedications, and requires an additional set of architectural guidelines for development. Because the USS contains countless subjective criteria, it inserts a level of uncertainty for any potential development. For example, the USS states that “typically acceptable building size, mass, bulk, scale and height in the Upper State Street area is a two-story development.” (Upper State Street Design Guidelines, p. 3-8). The USS then goes on to list 7 different criteria, many of which are subjective, to be met before the City would consider a three-story building. As a property owner, the lack of certainty and objective standards to simply request more than two-stories unnecessarily discourages the type of density represented in the Housing Element. While the Housing Element acknowledges the barriers to development created by the USS, it does not propose any specific actions to alleviate these barriers. We believe the Housing Element update is the place to address these issues and make the necessary changes in the City’s development standards to provide certainty to property owners.</p>	Comment noted. Zoning changes are anticipated through a public process during the planning period. No site planning analysis or project has been submitted for review by the City for this planning area to date.
	The Housing Element’s Suitable Sites Inventory assigns 44 units to our property based on the Medium-High Density designation and an	For parcels that meet improvement and land valuation criteria, typical residential densities by zone are identified and included in

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	<p>assumption that 22 units/acre can be constructed under the existing City zoning and development standards. The Housing Element assumes 22 units per acre “based on average densities of projects approved during the 5th RHNA Cycle.” It is unclear whether this assumption considers the additional development standards and restrictions required in the USS, including specifically the height restrictions and setbacks. We assume it does not. We could build 44 units on the property at two-stories and in compliance with all USS restrictions without tearing down multiple structures. There is no incentive to tear down a successful 68-room hotel to build 44 units. The Housing Element update should evaluate how the USS prevents the actual development of density allowed under the zoning ordinance. The USS height restriction and setbacks are two of many restrictions that should be considered and revised in the Housing Element update. We assume most other properties in the USS, many of which are zoned for Medium-High Density and High Density development, have the same problem meeting the densities called for in the Suitable Sites Inventory. It may be possible to meet the densities in the Suitable Sites Inventory if an owner were to request concessions, waivers or modifications under State Density Bonus laws or other State housing laws, but these are essentially ways to get out of following the City’s ordinances and regulations. The Housing Element update is supposed to analyze governmental restrictions that prevent or restrict the production of housing. Forcing owners to rely on State laws to circumvent local regulations is not consistent with the Housing Element’s purpose. Furthermore, relying on State law to overcome development hurdles imposed by the City’s existing ordinances and building regulations is subject to interpretation by the City. As but one example, we have explored with the City developing a childcare facility in exchange for increased housing density, which is permitted by</p>	<p>the inventory. Sites with historic resources and environmental constraints are excluded. No exhaustive parcel by parcel proforma analysis is necessary to demonstrate that redevelopment is feasible for each site.</p> <p>HE-1 will provide new incentives in the form of more permissive regulations for conversion of existing uses, including hotels, to residential uses.</p>

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	<p>State law (Government Code section 65915(h)). However, the City's "interpretation" of the applicable State law gives us a density bonus that is 10 times less than what we believe we are entitled to under State law. This sort of uncertainty makes it extremely difficult to invest in development. The Housing Element can and should clarify the City's interpretation on this particular issue as childcare and housing are interdependent.</p>	
	<p>The Housing Element's Suitable Sites Inventory assigns 35 lower-income units and 9 moderate-income units to our property, for a total of 44 units. Put another way, our property has been designated in the Housing Element as a 100% affordable housing site. This is plainly incorrect. We are not the Housing Authority or a non-profit low-income housing provider with access to state and federal funding. We are not sure what "past performance, current regulations or budget assumptions" the City is relying on for its analysis, but it is not based on any reality a private property owner lives in. Current City regulations do not require a 100% affordable project at our site. We do not know of any private party that has developed a 100% affordable housing project during the 5th cycle. It is financially impossible for us to construct a housing project that is 100% affordable. We are concerned that the Suitable Site Inventory, if not corrected, sets an expectation at the City and in the community that any housing on our property must be 100% affordable. We request the City amend the Suitable Site Inventory to accurately reflect the "best estimate" of affordable units using real life budget assumptions and the past performance of private residential development projects. Such an estimate should be based on the City's building standards and regulations.</p>	<p>Comment noted.</p>
	<p>Though somewhat unrelated to the Housing Element, we also suggest the City consider the financial impact of the City's inclusionary housing requirement. If the City is serious about developing very-low and low-</p>	<p>See GR-7.</p>

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	<p>income housing, it has to consider the financial impact of requiring developers to not only provide income-restricted units to meet the City's inclusionary requirement, but then provide additional affordable units to get a unit density that makes the project pencil. The City's "double dip" is a serious impediment to housing.</p>	
	<p>The Housing Element fails to reflect City Council's earlier directive that staff consider increased density on the north side of State Street. During past discussions, the Council has asked staff to consider increasing densities in the USS, including our property. We see no mention of this directive or any proposal to consider an increased density.</p>	<p>The Housing Element demonstrates the City's capacity to accommodate expected housing needs in 2031. Rezoning to provide additional capacity during the planning period would need to be prioritized with the programs in the Housing Element that the City adopts. The Affordable Housing Overlay is expected to include the Upper State Street corridor and allow for additional densities in this area.</p>
	<p>In conclusion, we have a strong desire to develop the property, but it makes no sense for us to do so using the existing zoning. In no way can we justify demolishing, or partially demolishing, a successful operating hotel under the unduly restrictive USS guidelines, without the kind of density allowed under the priority housing overlay to do so. We request that this property and the north side of State Street be added to the priority housing overlay in this Housing Element Update.</p>	<p>Comment noted.</p>
<p>June & Terrance O'Rourke 08/03/22</p>	<p>Overlay Zone Section and Goal 1: Create New Housing The Housing Elements mentions that there are 12 Overlay Zones. We would strongly advocate for a Funk Zone Overlay Zone or Neighborhood Plan that would provide a road map for how to incorporate more affordable housing in the Funk Zone while protecting the character of the neighborhood and preserving long standing uses that serve visitors, facilitate public recreation, and support the art and commercial fishing industries. Elements such as affordable live/work art spaces, requirements for adaptive re-use of existing buildings using Funk Zone area specific</p>	<p>Comment noted. Many of these suggestions are beyond the scope of a Housing Element.</p> <p>A separate work effort to develop and submit a Local Coastal Program Amendment to the California Coastal Commission is necessary to establish a Funk Zone Overlay or Neighborhood Plan.</p>

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	objective design standards, fully parked new residential and commercial development, incentives for preserving exiting ocean-oriented uses, and preservation of green spaces would help maintain the character and vitality of the Funk Zone.	
	Prioritize additional housing for the low and low-moderate workforce, with preferences given to people who work in the immediate area. We suggest that the City explore the ability to have all additional density be price restricted in perpetuity to low and low-moderate families to the greatest extent legally possible.	Comment noted.
	In order for new housing to maintain neighborhood capability, priority should be for residents who work in the area, with mandated accountability to oversee this from the City. There should also be preservation of current open/green space in which makes the Funk Zone the thriving resident and tourist alike destination it is today.	Comment noted.
	Promote housing stability. We suggest that the city consider prohibiting the conversation of any new housing in the Coastal Zone to short-term rentals. There is a plethora of hotels in the area to meet the needs of visitors, and any housing being proposed should be dedicated to residents.	See GR-3.
	Suitable Sites Inventory Listing: On page 80, in the Suitable Sites Inventory Summary section it states that the Suitable Sites Inventory (Appendix G) identifies the buildout potential of vacant and underdeveloped parcels. It continues to say that the following criteria were used to identify suitable sites and development potential. One of the criteria is: Realistic buildout densities were determined based on average densities of projects approved during the 5th RHNA Cycle.	See GR-13.

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	<ul style="list-style-type: none"> • For Medium-High density (max 27 units/acre), 22 units/acre was used. • For Priority Housing Overlay (max 63 units/acre), 59 units/acre was used. • For multi-unit residential in the Coastal Zone, 20 units/acre was used. <p>If 20 units/acre was used to determine realistic buildout densities in the Coastal Zone and 27 units/acre were used for medium-density, how is the 121 E. Mason Street 2.1 acre pending project in the Funk Zone listed as having a total capacity of 155? Its base density is only 57. This greatly exceeds what is available through the State Bonus Density Law and seems to be incompatible with the City's zoning laws.</p>	
Shelley Klein 08/03/22	<p>Overlay Zone Section and Goal 1: Create New Housing</p> <p>The Housing Elements mentions that there are 12 Overlay Zones. We would strongly advocate for a Funk Zone Overlay Zone or Neighborhood Plan that would provide a road map for how to incorporate more affordable housing in the Funk Zone while protecting the character of the neighborhood and preserving long standing uses that serve visitors, facilitate public recreation, and support the art and commercial fishing industries. Elements such as affordable live/work art spaces, requirements for adaptive re-use of existing buildings using Funk Zone area specific objective design standards, fully parked new residential and commercial development, incentives for preserving exiting ocean-oriented uses, and preservation of green spaces would help maintain the character and vitality of the Funk Zone.</p> <p>Prioritize additional housing for the low and low-moderate workforce, with preferences given to people who work in the immediate area. We suggest</p>	<p>Comment noted. Many of these suggestions are beyond the scope of a Housing Element.</p> <p>A separate work effort to develop and submit a Local Coastal Program Amendment to the California Coastal Commission is necessary to establish a Funk Zone Overlay or Neighborhood Plan.</p> <p>Comment noted</p>

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	that the City explore the ability to have all additional density be price restricted in perpetuity to low and low-moderate families to the greatest extent legally possible	
	In order for new housing to maintain neighborhood capability, priority should be for residents who work in the area, with mandated accountability to oversee this from the City. There should also be preservation of current open/green space in which makes the Funk Zone the thriving resident and tourist alike destination it is today.	Comment noted
	Promote housing stability. We suggest that the city consider prohibiting the conversation of any new housing in the Coastal Zone to short-term rentals. There is a plethora of hotels in the area to meet the needs of visitors, and any housing being proposed should be dedicated to residents.	See GR-3.
	<p>Suitable Sites Inventory Listing: On page 80, in the Suitable Sites Inventory Summary section it states that the Suitable Sites Inventory (Appendix G) identifies the buildout potential of vacant and underdeveloped parcels. It continues to say that the following criteria were used to identify suitable sites and development potential. One of the criteria is: Realistic buildout densities were determined based on average densities of projects approved during the 5th RHNA Cycle.</p> <ul style="list-style-type: none"> • For Medium-High density (max 27 units/acre), 22 units/acre was used. • For Priority Housing Overlay (max 63 units/acre), 59 units/acre was used. • For multi-unit residential in the Coastal Zone, 20 units/acre was used. 	See GR-13.

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	<p>If 20 units/acre was used to determine realistic buildout densities in the Coastal Zone and 27 units/acre were used for medium-density, how is the 121 E. Mason Street 2.1 acre pending project in the Funk Zone listed as having a total capacity of 155? Its base density is only 57. This greatly exceeds what is available through the State Bonus Density Law and seems to be incompatible with the City's zoning laws.</p>	
<p>Santa Barbara Adult & Aging Network 08/03/22</p>	<p>Prioritize older adults as a specific goal in Housing Elements and in Housing Element planning.</p> <ul style="list-style-type: none"> ● Define "senior housing" more clearly to include requirements for accessibility and access to services. ● Zone for more senior housing options to meet senior needs as they progress through the senior housing care continuum, especially the urgent need for affordable assisted living, memory care, and housing options to meet complex needs. ● In Santa Barbara County, expand "By Right" zones in which senior housing with services is a permitted use. ● In commercial zones, expand permitted uses for licensed residential care, with conditional use permits for independent living as a by right use. 	<p>Goal 2 speaks to prioritizing affordable housing for special needs households, which includes seniors.</p>
	<p>Expand the use of the density bonus to increase the supply of affordable housing units for seniors that meet accessibility requirements and are near public transportation, medical facilities, shopping, and caregiving resources.</p>	<p>Comment noted.</p>
	<p>Provide regulatory incentives for builders</p> <ul style="list-style-type: none"> ● Add a regulatory "Fast-track" incentive for builders on senior housing projects (similar to SB 330). 	<p>Housing Element program HE-3 will explore methods to reduce governmental constraints.</p>
	<p>Increase physical accessibility of Accessory Dwelling Units (ADU's) so that ADU's are accessible to older adults and people with disabilities.</p> <ul style="list-style-type: none"> ● Require that any ADUs above 450 sq ft meet or exceed ADA Accessibility Standards. 	<p>Housing Element program HE-4 will look at ways to further facilitate production of ADUs.</p>

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	<ul style="list-style-type: none"> ● Provide a building subsidy for ADUs of any size that meet or exceed ADA Accessibility Standards (an accessible unit requires: wider door, no stairs, grab bars, etc.). ● Add a regulatory “Fast-track” permitting incentive for new ADUs that meet ADA Accessibility requirements. ● Model Example: La Más Backyard Homes Project in Los Angeles 	
	<p>Permit parking reductions to incentivize more senior friendly housing.</p> <ul style="list-style-type: none"> ● The State density bonus law (Government Code Section 65915 et seq) allows permitting parking reductions which can result in a better environment, lower costs, or both. Recommendations include owner/operator van transport and charging stations for mobility devices (e.g. electric bicycles and 3-4 wheeled outdoor devices). 	Housing Element program HE-3 will explore methods to reduce governmental constraints.
	<p>Explore innovative housing models such as micro units in urban areas, shared/inter-generational housing (San Luis Obispo County example, - HomeShareSLO (smartsharehousingsolutions.org), and satellite Federally Qualified Health Centers (FQHCs) providing intensive mental health services with licenses for co-located clinics or mobile operations (Alameda County example).</p>	Housing Element program HE-6 seeks to facilitate innovative housing types.
S. Pachter 08/03/22	<p><u>Concerns about potential use of La Cumbre Plaza:</u></p> <p>The possibility of redeveloping the mall by adding 1,900 housing units constitutes a major change in the community with many complex issues to be further addressed at a later date. However, it appears that talks are already underway as stated on Page 86 "...the property owners are interested in redeveloping the site."</p> <p>Adding 1,900 housing units would increase the number of people in the area by at least one person and perhaps more (including family members</p>	See GR-6.

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	<p>or roommates). It is unknown if all individuals living in the units would be existing city residents or new to the city. Nonetheless, the impact of adding at least 1,900 people to the La Cumbre Plaza site will result in intentional overcrowding by design.</p> <p>Please consider downsizing the potential La Cumbre Plaza housing project.</p> <p>Would you please share if there have been recent projects in the city of Santa Barbara that have provided 1,900 or more housing units on one property and the impact.</p> <p>Please take extra steps to communicate about any discussions that have already occurred and any future discussions or plans about a possible La Cumbre Plaza housing project. Sending information by U.S mail will reach more people.</p>	
	<p><u>Communication importance:</u> Changing the use of the Rose Garden Inn last summer had a dramatic negative impact on the adjacent neighborhoods and businesses. Many were unaware of how the Rose Garden Inn was to be used and once discovered, there was a lack of time to compose and voice concerns or suggestions before the City Council voted to approve the action item. Therefore, please take extra time and steps to provide a generous amount of communication and opportunity for feedback regarding a potential La Cumbre Plaza housing project.</p>	<p>Comment noted. Details of the La Cumbre Plaza planning effort will include public outreach and discussed at several public hearings once it is initiated.</p>
	<p><u>Parking:</u> For the potential La Cumbre Plaza housing project and other possible projects, please consider requiring at least two parking spaces per unit that are located on the property.</p>	<p>Comment noted.</p>

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	<p>It seems reasonable to assume that for a lot of people it takes at least two incomes to pay for a mortgage or rent. Two income earners that may need two vehicles to drive to work, drop off and pick up kids from daycare and schools, go to medical appointments, the grocery store and more. Cars are not going away.</p> <p>It is not realistic to assume that for the La Cumbre Plaza or other potential housing projects that all residents will have employment or other destinations that are a very short distance away and can be easily reached by walking, using the bus or riding a bicycle. Also, expecting residents or their guests to find parking on the street or in a public lot may result in the overcrowding of these locations.</p>	
	<p><u>Mandatory electric car charging:</u> Please consider an item for mandatory electric car charging stations for all housing projects.</p>	<p>Electric car charging is included in California’s State building codes. According to Section 4.106.4.1 of the California Green Building Standards Code, all newly constructed single-family and two-family dwellings are required to be “EV ready” with the installation of a “listed raceway to accommodate a dedicated 208/240-volt branch circuit.” Furthermore, newly constructed multi-family developments are subject to stricter EV charging codes. On the basis of Section 4.106.4.2 of the Code, “Where 17 or more multifamily dwelling units are constructed on a building site, 3 percent of the total number of parking spaces provided for all types of parking facilities, but in no case less than one, shall be electric vehicle charging spaces (EV spaces) capable of supporting future EVSE.” The state and the City is thus committed to increasing accessibility to EV charging stations.</p>
	<p><u>Security:</u></p>	<p>Comment noted.</p>

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	<p>Please consider adding a requirement for 24 hour on-site security personnel and electronic security to increase safety.</p> <p><u>Public Schools:</u> Perhaps consider adding a section for public school districts, both Hope and Santa Barbara Unified, to provide general information regarding the possible impact of changes to the student population with the addition of new housing. Specifically, the possible La Cumbre Plaza housing project.</p> <p>This may be difficult to define as it is hard to know if the potential La Cumbre Plaza 1,900 housing units would be lived in by existing Santa Barbara city residents or if the individuals would be new to the city of Santa Barbara and if there would be children and how many.</p> <p>It might also be difficult to know if potential students would be currently enrolled in a public school and by moving into the potential La Cumbre Plaza housing, if that would result in staying in the same school district and school campus or if there would be a shift to a new school district and school campus.</p> <p>Other possible school district information might include additional details regarding developer fees, the need for additional classrooms or increased class sizes, possible need to hire additional certificated and classified staff, the impact of increased traffic congestion to drop off and pick up students, and more.</p>	<p>Development fees collected for schools are generally considered adequate mitigation for school impacts, assuming there is enough capacity on the school site for increased enrollment.</p> <p>See GR-6 for more information.</p>
<p>Law Office of Marc Chytilo 08/03/2022</p>	<p>The Law Office of Marc Chytilo is representing Keep the Funk, Inc (“KTF”). As proposed, the Draft Housing Element’s (DHE) Suitable Sites Inventory includes the residential component of the proposed 155 unit (“SoMo Funk”) mixed-use project which would level an entire City block and completely transform the Funk Zone’s unique character for a bare-minimum of</p>	<p>See GR-13</p>

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	<p>affordable housing units. The proposed 155-unit project is unrealistic, conflicts with existing coastal policies, and is incongruous with the goals and policies of the proposed Draft Housing Element. In order to ensure the City has a more accurate count of units that are reasonably likely to actually be constructed, the Suitable Sites Inventory should be revised to reduce the overall unit capacity, and increase the proportional share of affordable capacity. The 155 unit proposal is unrealistic, inconsistent with state and local law, and should not be included in the Suitable Sites Inventory as proposed.</p>	
	<p>To achieve the goal of engaging the community (Goal 6), the language of the goal and associated policies and programs should include soliciting feedback <i>from</i> the community early in the planning process for new housing projects. Goal 2 (Prioritize Affordable Housing) and its associated policies and programs could be strengthened to better address the affordability crisis and clearly link the increased flexibility (Policy 1.8) and reduced constraints (Policy 1.4) to only those projects that meaningfully exceed the minimum required for compliance with State mandates including the State Bonus Density Law. Adaptive reuse has allowed the Funk Zone to transition from a manufacturing hub and industrial area to a thriving visitor destination, and we appreciate that the DHE seeks to promote adaptive reuse (e.g. Policy 1.3 and Program HE-1). This policy and program should be strengthened by requiring adaptive reuse to the maximum extent feasible. This would substantially reduce impacts from construction, and maintain community character and cohesion. The DHE requires revision to ensure that new citywide objective design standards (Policy 1.5, Program HE-5) do not compromise the unique character of neighborhoods like the Funk Zone. Developing a new Funk Zone Overlay is one possible</p>	<p>Comment noted. A separate work effort to develop and submit a Local Coastal Program Amendment to the California Coastal Commission is necessary to establish a Funk Zone Overlay or Neighborhood Plan.</p>

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	<p>approach, and we welcome further discussions with the City about such a possibility.</p>	
	<p>We're concerned that the proposed Suitable Sites Inventory identifies an unrealistically high total capacity of 155 new residential units at 121 E. Mason St. (by contrast the 2015 Housing Element identified 22 units as the "Realistic Net New Units" for the same site¹), and an untenably low capacity of 28 units for lower and moderate income units (14 respectively). The Suitable Sites Inventory identifies the base density for this parcel at 57 units; 155 units represents a 171% increase over base density, with only 18% affordable units (9% low income). As explained the second Incomplete Letter for SoMo Funk (dated June 9, 2021), the proposed residential density substantially exceeds what State Density Bonus Law would allow and is inconsistent with the City's Density Bonus Program. To be consistent with the City's Affordable Housing Practices and Procedures, all excess units above the SDBL allowance (65) would need to be provided at rents affordable to low income households. (Id., SoMo Funk Second Incomplete Letter, p. 2.)</p>	<p>See GR-13.</p>
	<p>The applicant has proposed a Development Agreement to allow the increased density without complying with the City's Density Bonus Program. This approach is inconsistent with the existing and proposed Housing Element affordability goal and policies, and appears to be contrary to City law. Specifically, Coastal Land Use Plan ("CLUP") Policy 2.1-1 only allows the City to increase density beyond that established by underlying land use designations and zoning for three specific types of affordable housing developments: Density Bonus, Inclusionary Housing, and Lot Area Modification for affordable housing only. SoMo Funk's 155 unit proposal includes the maximum number allowed under the State Bonus Density program (20) and the City's AUD program does not apply in the Coastal</p>	<p>Comment noted.</p>

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	Zone. Two units of Inclusionary Housing are proposed. The additional 65 units requested are not authorized by any Bonus Density or Inclusionary Housing program, and are not for affordable housing only. The SoMO Funk Project is inconsistent with numerous CLUP policies.	
	KTF supports applying a housing density of 20 units per acre as a reasonable realistic building potential for this site, or at a maximum, 57 units, the allowable base density for the site. KTF supports the requirement that all SoMo Funk housing be affordable, but in any case, the total development should not exceed what is allowable under State Density Bonus law and currently applicable City ordinance.	See GR-13.
	Goal 6 and Policies 6.1 and 6.2 are entirely one-sided, providing for to outreach to the community to educate the community. However, “engagement” goes both ways, and should expressly include soliciting and responding to community feedback. The City should avail itself of the historic high level of community engagement in land use planning matters, and support the expansion of affordable housing throughout the community while maintaining and enhancing community character.	Comment noted, revised draft includes several edits to these policies.
	While the Draft Housing Element seeks to prioritize affordable housing, Goal 2 (Prioritize Affordable Housing) and its associated policies and programs could be strengthened to better address the affordability crisis. Enhanced measures, such as more aggressively compensating landowners to extend expiring and even mid-life covenants can be an efficient means to avoid loss of affordable housing stock. Policy 4.4 could be expanded to develop compensation packages for homeowners that agree to enroll existing, market rate rentals into long term affordable status through voluntary, albeit compensated, covenants. The increased flexibility (Policy 1.8) and reduced constraints (Policy 1.4) referenced in the DHE should apply only to projects that go above and beyond the minimum number of	Comment noted, details will be further defined when programs as initiated.

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	<p>affordable units required for compliance with State mandates including the State Bonus Density Law. Recent market-rate rent escalation should be harnessed to increased inclusionary percentages, and not enable windfalls to developments whose <i>pro formas</i> have recently changed considerably and thus could carry increased percentages of affordable units, or carry the initial number of affordable units with a lesser number of market-rate units. These policies should further clarify that any increased flexibility and reduced constraints must remain in compliance with General Plan and CLUP goals and policies.</p>	
	<p>Policy 1.2 and Program HE-1 can be strengthened by requiring adaptive reuse to the maximum extent feasible either City-wide, or in the Funk Zone specifically.</p>	<p>Details of Housing Element program HE-1 will be further defined when it is initiated.</p>
	<p>Policy 1.5, Program HE-5 have the potential to compromise the unique character of the Funk Zone. There are currently twelve Overlay Zones in the City, listed on Table 30 of the Draft Housing Element, to (among other things) ensure compatibility with the existing historic character of these areas. Developing a new Funk Zone Overlay should be pursued to help ensure that neighborhood-specific standards (which can be objective in nature) apply within this important area.</p>	<p>A separate work effort to develop and submit a Local Coastal Program Amendment to the California Coastal Commission is necessary to establish a Funk Zone Overlay or Neighborhood Plan.</p>
<p>Troy A. White 08/03/2022</p>	<p>Will the Housing Element Update consider removing the housing restrictions for properties in the Funk Zone, located south of UPRR tracks?</p>	<p>These properties have a land use and zoning designation that does not allow residential use. Changing the use would require a Local Coastal Plan amendment. This change would not likely be supported by the California Coastal Commission because the Coastal Act prioritizes visitor serving commercial recreational facilities over private residential development.</p>
<p>Keith Diggs 08/03/2022</p>	<p>Barcelona, a destination city with a similar climate and geography as Santa Barbara, has an <i>average</i> housing density of 93 homes per acre. Santa Barbara's <i>maximum</i> is 36, and is set lower still throughout most of the City</p>	<p>The dwelling units per acre listed in Table 29 reflects base density but areas with the Average Unit Size Density Incentive Program</p>

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	(Draft, pp.48–49). Your author recently visited Barcelona, and could not find any of the tent cities that Californians have grown accustomed to, nor any “congested warren of gerbil units stacked to the sky” as local anti-growth activists fear. It simply seemed like a nice place to live, and Santa Barbara can and should aspire to grow like Barcelona—not Los Angeles.	can achieve densities up to 63 units per acre, depending on average unit size.
	Santa Barbara can do much more to “remove governmental ...constraints to the maintenance, improvement, and development of housing” as State law requires. (Gov. Code § 65583(c)(3).) To start, very few of the City’s proposed programs commit to specific actions or timelines (see Draft, pp.85–102), and we call on the City to make such commitments in its forthcoming draft to HCD. For example, the City recognizes that its 45-foot height limit will “constrain[] ... housing” in its forthcoming La Cumbre Specific Plan, but the City only makes a vague offer to “address[]” this (how?) when the Plan is developed. (Draft, p.51.)	Comment noted.
	More generally, it is well established that midcentury American design restrictions such as parking minimums, lot-size minimums, minimum setbacks, and maximum heights are a major driver of the housing shortage, and yet the City appears set to largely maintain them. (See Draft, pp.F-1 to -4.) It should abolish them instead. The City need not invite skyscrapers on State Street, either: traditional multistory buildings are adequate to house a dense city, and we ask the City to announce and implement its adaptive reuse program (Draft, pp.85–86) immediately.	Comment noted.
	The City must also do more to “affirmatively further fair housing.” (<i>E.g.</i> , Gov. Code § 65583(c)(5).) The Draft ignores that the City enacted an explicit population cap in 1975, which would certainly explain the City’s plummeting home production since the 1970s (Draft, p.13). And the City’s site inventory (Draft, App. G) would literally segregate all but twelve opportunity sites on one side of the train tracks. Setting aside the relatively	The parcels selected in the sites inventory met the criteria listed in the draft (pg. 73), in particular, they had to exhibit a development potential of at least 10 units. The neighborhoods mentioned in this comment are primarily zoned for single unit residential. These neighborhoods will develop ADUs and Junior ADUs, and they are eligible to apply for lot splits and two-unit residential development

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	less accessible hillside locations in the north, the City is planning to site no new housing in the accessible, but relatively whiter and richer, neighborhoods of Bel Air, Alta Mesa, East Mesa, or West Mesa. This will fail to “overcome patterns of segregation” as State law requires. (Gov. Code § 65584(e).)	under Senate Bill 9. The inventory assumes ADU development but does not select individual parcels for ADUs.
David Dart and Erika Carter 8/3/22	We support additional housing opportunities to be created in the Funk Zone, but would like to see the following elements incorporated into the housing element and city planning documents to achieve these goals: 1. Overlay Zone Section and Goal 1: Create New Housing The Housing Elements mentions that there are 12 Overlay Zones. We would strongly advocate for a Funk Zone Overlay Zone or Neighborhood Plan that would provide a road map for how to incorporate more affordable housing in the Funk Zone while preserving the character of the neighborhood and supporting long standing uses that serve visitors, facilitate public recreation, and support the art and commercial fishing industries. Elements such as affordable live/work art spaces, requirements for adaptive re-use of existing buildings using Funk Zone area specific objective design standards, fully parked new residential and commercial development, incentives for preserving exiting ocean-oriented uses, and preservation of green spaces would help maintain the character and vitality of the Funk Zone.	A separate work effort to develop and submit a Local Coastal Program Amendment to the California Coastal Commission is necessary to establish a Funk Zone Overlay or Neighborhood Plan.
	2. Prioritize additional housing for the low and low-moderate workforce, with preferences given to people who work in the immediate area We suggest that the City explore the ability to have all additional density be price restricted in perpetuity to low and low-moderate families to the greatest extent legally possible.	Comment noted.
	3. Prioritize live/work art spaces and outdoor green space	HUD allows Public Housing Authorities (PHA) to set local preferences for those who live or work in the jurisdiction which the

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	<p>In order for new housing to maintain neighborhood capability, priority should be for residents who work in the area, with mandated accountability to oversee this from the City. There should also be preservation of current open/green space in which makes the Funk Zone the thriving resident and tourist alike destination it is today.</p>	<p>PHA serves so that the resources intended to serve that residents of that community are properly allocated. The City's Housing Authority sets their local live/work preference jurisdiction as the entire South Coast of Santa Barbara County (Gaviota through Carpinteria) so as not to create a disparate impact on a protected group. With legal input, the City could consider a similar preference system for deed restricted affordable housing not provided by the Housing Authority as long as the boundary is sufficiently broad, like the South Coast, to ensure that it follows Fair Housing Laws.</p>
	<p>4. Promote housing stability We suggest that the city consider prohibiting the conversion of any new housing in the Coastal Zone to short-term rentals. There is a plethora of hotels in the area to meet the needs of visitors, and any housing being proposed should be dedicated to residents.</p>	<p>Comment noted.</p>
	<p>5. Suitable Sites Inventory Listing On page 80, in the Suitable Sites Inventory Summary section it states that the Suitable Sites Inventory (Appendix G) identifies the buildout potential of vacant and underdeveloped parcels. It continues to say that the following criteria were used to identify suitable sites and development potential. One of the criteria is: Realistic buildout densities were determined based on average densities of projects approved during the 5th RHNA Cycle. ▪ For Medium-High density (max 27 units/acre), 22 units/acre was used. ▪ For Priority Housing Overlay (max 63 units/acre), 59 units/acre was used. ▪ For multi-unit residential in the Coastal Zone, 20 units/acre was used. If 20 units/acre was used to determine realistic buildout densities in the Coastal Zone and 27 units/acre were used for medium-density, how is the</p>	<p>See GR-13.</p>

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	<p>121 E. Mason Street 2.1 acre pending project in the Funk Zone listed as having a total capacity of 155? Its base density is only 57. This greatly exceeds what is available through the State Bonus Density Law and is incompatible with the City's zoning laws.</p> <p>As residents of the Funk Zone, we can attest that the neighborhood would not be able to handle that size of a development and that it would forever change the character of the Funk Zone, negatively impacting its vitality. Businesses, residents, customers, and tourist all struggle to find parking. Congestion makes it hard to enter and leave the neighborhood easily. Many of the buildings in the Funk Zone are not more than two or three stories tall and have had their uses adapted, creating an interesting and vibrant community. Additionally, the Funk Zone is not near a local transportation hub or rapid transit station, virtually requiring a car to get to work, school, medical facilities, the grocery store, or other essential amenities.</p> <p>It is also important to state that the 121 E. Mason Street project, 'SOMOfunk development' is at the very beginning of its review process. The ABR received over 160 written comments, with more than 98% opposed to the development, and over 20 speakers voiced their objections and concerns at last month's ABR meeting. It is not appropriate to include this development at 155 units – a level that far exceeds the City's own standards – before the existing community has had a full opportunity to weigh in before the Planning Commission and City Council.</p> <p>We respectfully request that the City reduce the densities proposed in the Suitable Sites inventory for 121 E. Mason to correlate to the base density of the site.</p>	