

Public Comments on August 19, 2022 HCD Review Draft 2023 – 2031 Housing Element

Name of Sender/Date Received	Comment	Response
<p>Steve Johnson 08/29/22 and 09/07/22</p>	<p>I suggest modifying parking requirements to provide only a minimal number of parking spaces (for use by onsite managers, maintenance personnel, and delivery vehicles) for housing projects within .5 mile of transit.</p> <p>Two bills in the legislature (SB 1067 and AB 2097) nearly passed this year. Each would have eliminated parking requirements for housing projects located within .5 mile of transit. The cities of San Francisco, Sacramento, and Berkeley have already made such changes to their parking requirements.</p> <p>In addition, limit occupancy to residents without cars.</p>	<p>AB 2097 passed and no parking minimums will be required for projects within 0.5 miles of public transit as defined in the bill.</p> <p>For AUD projects in the Central Business District, the City’s standard parking requirement is one space maximum per unit. Developers can opt to include minimal parking and limit occupancy to residents without cars.</p>
<p>Granite Peak Integral DLV, LP – GP Real Estate Advisors, Inc. 08/29/22</p>	<p>We are the owners of the property located at 2840 De La Vina Street, which was included in the List of Suitable Sites for housing development in the proposed Housing Element Update to the General Plan. The List of Suitable Sites shows a Total Capacity on this De La Vina property of 45 units on the 2.08-acre parcel, which equals 21.63 units per acre density. The current zoning on the property is Commercial-Medium High Density Residential (15-27 units per acre), which would allow up to 56 units of residential.</p> <p>On August 10, 2022 we conducted a Planner Consultation with city planning for this property on a proposed redevelopment of the site into 100-120 units of residential above ground floor commercial. The reason for this proposed redevelopment density is it would allow us the economies required to provide housing on this site after demolishing and replacing the active/productive retail/commercial center of 30,000 square feet of buildings on 2 acres. Replacing this grocery-anchored retail center with only 45 residential units is not economically feasible and would require us to take a huge loss on our investment into the leased commercial property. To justify</p>	<p>The density calculation for this site assumes the existing Commercial-Medium High Density Residential designation. All sites in the inventory were assigned a “realistic density” lower than the maximum density allowed due to unknown geographic and environmental constraints.</p> <p>The unit assumptions in the Suitable Sites Inventory should not be considered a limit on what could be achieved on any individual site. There are options to increase density such as Density Bonus. At this time however, this site is subject to a height limit of 45’ because it is in the Upper State Street Overlay Zone. Changing the density or development standards for this individual site was not considered in the Housing Element because the City could accommodate the Regional Housing Needs Allocation without rezones. Implementation of Housing Element Programs, including any changes to the Average Unit Size Density Incentive (AUD) Program would be the opportunity to propose a change to a higher</p>

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	<p>taking this shopping out of service, a 50-60 units per acre residential density is required to encourage housing on this site. As you may know, construction of this density requires a building height of at least 5-stories and a building height limit above the current of 60'. Current planning codes of 45' height does not even accommodate a 4-story building.</p> <p>In summary, it is not an appropriate use of housing allocation on the 2840 De La Vina property to assign 45 units, because it cannot be justified building that few of units in favor of maintaining the existing shopping center. Without increased densities up to at least 50 units/acre and a higher building height limit, residential development will not take place on this or similar improved commercial properties.</p> <p>We feel the zoning for 2840 De La Vina should be changed in the Housing Element Update to High-Density Residential with density of 50-60 units per acre as a realistic way to encourage and produce more housing in the City of Santa Barbara.</p>	<p>density residential designation.</p>
<p>Kelly Almeroth 09/11/22</p>	<p>I am writing to you with a concern regarding the proposed housing project at La Cumbre Plaza. I am a homeowner within the Hope School District boundaries, which this project also shares, as well as a lifelong Santa Barbara resident. I understand the need for housing and support the project. My main concern is the impact a new housing development of this size will have on the school district. With only three schools, Hope Elementary School District is unable to absorb a large number of students quickly. In reading the HSE report I am not seeing anywhere mention of the major stakeholder, Hope School District as part of the discussion nor a plan to include them, only a brief and vague mention of schools. I believe it would be an asset for this project to allow Anne Hubbard, the Superintendent of Hope Elementary School District, to be a consistent and</p>	<p>The City has received multiple comment letters on the impacts to the Hope School District from redevelopment of the La Cumbre Plaza Planning Area to housing. Furthermore, since the publication of the HCD Review Draft Housing Element on 8/19/22, a private developer submitted a preliminary application for housing on a portion of the La Cumbre Plaza Planning Area.</p> <p>The Santa Barbara School District collects Developer Fees on commercial and residential development on behalf of the Hope School District. The fees are meant to fund additions to school facilities to serve growing student populations. According to the December 2022 Developer Fee Justification Study Hope School</p>

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	<p>official part of these discussions. Her input is vital for this project to be a success, as well as accepted and supported by the community.</p>	<p>District, new fee amounts of \$2.40 (50% of \$4.79) per square foot for residential construction are necessary to accommodate impacts from projected development activity, including 733 new homes over the next five years.</p> <p>The Program Environmental Impact Report (EIR) being prepared for the 2023 – 2031 Housing Element will evaluate the impacts of Housing Element policies and programs on public services, including schools. This analysis however is general throughout the City and not targeted towards specific projects, which undergo their own environmental review process.</p> <p>The discretionary review process for proposed projects at La Cumbre Plaza will provide the opportunity for input and discussion from the Superintendent of Hope School District.</p>
<p>Lilly Josenhans 09/11/22</p>	<p>After reviewing the August 29th, 2022 HCD Review Draft, I noticed there is an arguably negligent failure to address the impact on the school system. On Page 2, there is discussion of the elements that comprise an "integrated planning approach." Astonishingly, while it is required to consider how such an enormous development would impact elements such as conservation and noise, somehow it is not required to consider the impact on local schools. Whether intentional or not, this is a glaring oversight. If even half of the units have just one child between the ages of 5 to 12, that would lead to a sudden and unmanageable influx of 950 elementary age students into the Hope School District. My understanding is that even a more moderate surge of 100 students to a single campus would require additional infrastructure and staffing, both of which would take many years to plan for financially and physically. This would include constructing additional</p>	<p>See response to K. Almeroth's letter above.</p>

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	buildings to house the increased student population	
	<p>Later, on Page 91 (HE-2), although the impact of schools is briefly mentioned in the effects to be considered, no method is identified for how this will be done. The school districts need an equal seat at the table to help identify the significant issues at hand, point out plans that will be unworkable, and outline solutions where possible. This input needs to come from those who are directly involved in the daily operations, fiscal management, and strategic planning of the schools, such as the superintendents, principals, board members, and staff. Their input and involvement will be integral to the success of this project.</p>	
<p>Natalie Uruk 09/11/22</p>	<p>I am writing as both a parent at Hope School District as well as a property owner in the school district regarding the absence of Anne Hubbard in discussions about the future housing development at La Cumbre Plaza. I understand our community's need for more housing and I support thoughtful and well planned solutions. My great concern is that a major player in the current project is missing from the discussion. Anne Hubbard has great insight into how a large influx of families and students for the district will effect it both financially and physically. These effects will last more than the initial year, and will have an impact on the students' (both current and future) performances and teachers' resources.</p> <p>I implore you to consider our children and the schools effected by this housing project as much as you do the creeks and traffic flow. Allow Anne Hubbard to be heard and a regular part of the discussion. Five years sounds like a long time to prepare but in the world of bureaucratic construction and funding shortages it is not enough time, and we all know this. Let Anne Hubbard help you make this project a true success.</p>	<p>Agree that input from the Superintendent is important. Please see response to K. Almeroth's letter above.</p>
<p>Keith DeMartini</p>	<p>My name is Keith DeMartini, and I am a father of 2 children at Monte Vista</p>	<p>Agree that input from the Superintendent is important. Please see</p>

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09/15/22	<p>Elementary School in the Hope Elementary School District. I also serve as the Treasurer of the Hope School District Education Foundation. I am writing to respectfully request that Dr. Hubbard, the district superintendent, be engaged and included in any and all planning-related meetings and the decision making process regarding the major residential development project located at La Cumbre Mall.</p> <p>When the project is completed and occupied, it will likely require that the district, and particularly the Vieja Valley school, accommodate many additional students. This capacity does not exist today, and it will require years of planning and funding to be able to do so. I believe the district should have representation so all impacts to the community, particularly the schools and serving the children who will eventually live in the new residential community, are taken seriously.</p>	response to K. Almeroth's letter above.
Donald Vogt 09/18/22	<p>While I admit that my perusal of the Housing Element Draft was cursory, a topic I was looking for did not appear.</p> <p>Single-family homes in both the City and the County are at risk of being converted to timeshare-like properties by firms like Pacaso, who buy a house and sell 1/8 fractional ownership interests through an LLC to out-of-town buyers seeking an inexpensive way to "own" a second home in Santa Barbara (and other destination cities). Pacaso then manages, for a fee, the home like a timeshare, scheduling the short times each owner can occupy the property. This type of operation not only has no place in the middle of a single-family neighborhood but also takes an eligible single-family home out of the stock of single-family homes.</p> <p>The only way to combat these timeshare-like conversions from happening</p>	The HCD Review Draft was revised to include a study of fractional ownership trends within Program HE-18: Hotel Zones Evaluation, and incorporate Zoning Ordinance amendments as necessary to protect long term housing stock.

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	<p>in the City and County is to update the Ordinance that covers timeshares and/or regulate managed fractional ownership with a new Ordinance. I have been promoting this to the City for several months, but no action has been taken.</p>	
<p>Tieira Ryder 10/07/22</p>	<p>I'm a housing advocate based in LA and I'm currently looking into creating a new community under an Indigenous identity/land back program that will work to keep the community affordable. Can you tell me how Santa Barbara is planning to further fair housing and if they would support land programs under a new indigenous municipality? I've been in contact with HCD and I will be asking them to support the motion as well. There are too many homeless peers across LA who are being targeted by police. My goal is to create a trust fund account that will begin actively building a new multi-family community that has both rental housing and homeownership but the land will always belong to the municipality so even if a homeowner sales their home, a portion of the sale would go back into the trust.</p> <p>The new community is going to support residents specifically impacted by racial and class violence. I plan to dedicate a portion of the housing for indigenous, Black, & other groups impacted by systematic housing violence and are looking for new housing options. There will also be a set percentage of PSH.</p>	<p>Appendix B of the Housing Element describes how the City is planning to further fair housing, as reflected in the Housing Element Programs. Staff recommends you discuss your proposal with local nonprofits working on affordable housing production and innovative housing solutions.</p>
<p>Steve Johnson 10/09/22</p>	<p>I suggest that the Housing Element be updated to recognize passage of AB2097. AB2907 favors designs leading to later conversion of non-habitable space to attached ADUs.</p> <p>A possible response: revise the City's ADU code to allow 2 attached ADUs to be proposed simultaneously with otherwise AUD compliant projects. In exchange, property owners would agree to recorded agreements to forego future additions of ADUs.</p>	<p>AB 2097 prohibits the City from imposing any minimum parking requirements on any residential, commercial, or other development projects within ½ miles of public transit as defined in the bill. It's not clear from the comment how this bill favors designs leading to later conversion of non-habitable space to attached ADUs.</p> <p>The City adopted amendments to the ADU Ordinance to allow owners of multi-unit development to allow up to two ADUs or up to 25% of the existing number of residential units on the lot, whichever</p>

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		is greater—instead of one—to be converted from existing floor area. Alternatively, it allows two new detached ADU units to be constructed.
Dusan Miletich 11/17/22	<p>I am an owner representative of 1130 Punta Gorda St, Santa Barbara, CA and we are requesting that the Planning Commission consider this site for a High-Density Residential designation under the 2023-2031 Draft Housing Element.</p> <p>As a mandatory part of the jurisdiction's General Plan assessment, the Housing Element's purpose has always been to identify suitable sites that will help implement the city and state's commitment to housing needs. The continued densification of 1130 Punta Gorda St is an opportunity to help the city of Santa Barbara meet these goals.</p> <p>Presently, this 1.26-acre site accommodates 40 manufactured housing units. At an existing 32 du/acre, the site is currently being utilized in congruence with the High-Density Residential designation of 27-36 du/acre, so the proposed Medium-Density Residential designation of 15-27 du/acre, would result in an effective downzoning of the property as it stands. The notion of using this site as a manufactured home development prompted this density, but with a shorter useful life of 10-15 years for this use, we want to ensure that this site can maintain its current density into the future. Lastly, we would like to highlight the location of our site. Our Punta Gorda site is located on the fringe of the Medium-Density Residential zone that abuts the 101 Freeway. Not only would this site minimize impact on any single-family homes, but also it could help to create a buffer between the neighborhood and the freeway in terms of noise and scale.</p> <p>We kindly ask that your department considers securing the density that already exists on this site, by designating it as High-Density Residential in your 2023-2031 Housing Element Draft. The urgent and foreseeable need</p>	<p>The existing residential designation for this site is Medium High Density (15 – 27 dwelling units/acre). The Housing Element does not propose any zone changes to this property and it is not included in the Suitable Sites Inventory. This site was developed at a higher density because the State of California has the authority to permit and regulate mobilehome parks and City standards don't apply.</p> <p>The City is not proposing any density changes in the Housing Element because the Suitable Sites Inventory can accommodate the Regional Housing Needs Allocation without rezones. Implementation of Housing Element Programs, including any changes to the Average Unit Size Density Incentive (AUD) Program would be the opportunity to propose a change to a higher density residential designation.</p>

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	for housing will be an ongoing issue in the city of Santa Barbara and this site has the capability to meet these needs in a thoughtful and deliberate way.	
Beth Hassenplug 12/14/22	<p>I am the Director at the preschool housed at the First Presbyterian Church up at State and Constance. We serve 80 families but childcare is desperately needed by many more families in Santa Barbara. As a member of the Child Care Planning Council I hope that you will read the letter below about how the city can support childcare by including language in the housing element update. Please let me know if you have any questions or would like to learn more about how we can support local business and families with quality care in Santa Barbara.</p> <p>On behalf of the Santa Barbara County Child Care Planning Council (CCPC), the publicly appointed, state-mandated local child care planning entity for Santa Barbara County, we are writing to encourage your city/county to include policies that support the development of child care facilities in your updated Housing Element. For working families with young children, having accessible child care near their home reduces traffic and commute times, and generally improves the quality of life for these residents. Including policies that are supportive of child care in or near housing is a straightforward way for cities to contribute to creating sustainable communities where families with young children can thrive. Your city/county's Housing Element update provides an opportunity to address the housing and child care needs of all working families, while examining the housing and child care needs of special populations, such as single-parents and female-headed households, in particular.</p> <p>In examining Housing Elements from throughout California, we have noted</p>	<p>Comment noted. Staff is in the process of drafting amendments to the Zoning Ordinance and will be adding language that allows Large Family Day Care facilities "by right" in accordance with state law. Staff is also proposing that Day Care Centers be classified as a Community Benefit Priority Project for the purpose of allocating nonresidential square footage in the City's Growth Management Program.</p> <p>Staff is reviewing the other options suggested to revise the Housing Element to further support child care facilities.</p>

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	that a number of cities and counties have included goals and policies that support the development of child care in or near housing. We have compiled sample policies in the document below in hopes that your city/county will include a number of them in your Housing Element update. Resources are available to help with that integration.	
Loretta Redd 3/9/23	With the right setbacks and design, Hale Park would make a good site for affordable housing project. You and your staff may want to go walk it and assess.	Land designated and zoned for Parks and Recreation, like Hale Park, require a General Plan and Zoning Ordinance amendment to convert it to residential use. Furthermore, per City Charter Section Section 520, land dedicated to public park or recreation purposes cannot be converted to other purposes except by voter approval. Parks are highly valued by City residents and not considered suitable sites for housing.
Nathan Post 3/15/23	The Housing Element has gone too far with a potential 2,000 units for [La Cumbre Plaza] shopping center. I would say that the number of housing units proposed for La Cumbre Plaza is inequitable for those living in the upper State Street area. If it can be changed, it should be. Some of these units should be moved to Paseo Nuevo. If they put a good number of these units in Paseo Nuevo, perhaps we could rebuild a vital State Street. State Street was ruined, I believe, by La Cumbre Plaza and Paseo Nuevo. It sucked the life out of State Street. We used to have department stores on State, including Sears (albeit a small one) and Penny's (fairly large), Montgomery Wards (small one) I. Magnin's, and Silverwood's, Lerner's, Sak's Fifth Avenue etc. Now we have a 99 Cent store. Are we exchanging Macy's for a 99 Cent store?	The potential number of units assumed for La Cumbre Plaza is based on the existing zoning and the realistic buildout density of 59 units/acre for parcels within the City's Priority Housing Overlay. The Paseo Nuevo site did not meet the City's criteria for a suitable site.
Jon Garvey 3/22/23	We spoke yesterday and I have been wanting to reach out to you on a handful of sites that we are digging into for the housing element. We would like to go after them however the density of 27 units/acre makes a lot of the larger sites difficult to make sense on redevelopment especially where	The unit assumptions in the Suitable Sites Inventory should not be considered a limit on what could be achieved on any individual site. There are options to increase density such as Density Bonus. At this time however, this site is subject to a height limit of 45' because

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	<p>pricing is. I was curious how receptive the city would be to the higher density of 67 units/acre for sites that sit on the north side of State St such as 3840 State St. There are larger parcels located there and I think the only way to pencil something is to allow for the higher density at those sites such as what was done at the Marc across the street at 3885 State St.</p>	<p>it is in the Upper State Street Overlay Zone. Changing the density or development standards for this individual site was not considered in the Housing Element because the City could accommodate the Regional Housing Needs Allocation without rezones. Implementation of Housing Element Programs, including any changes to the Average Unit Size Density Incentive (AUD) Program would be the opportunity to propose a change to a higher density residential designation.</p>