

# *Santa Barbara* GENERAL PLAN

## Implementation Update 5 Year Update Program Report



October 2018



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# Introduction

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## PURPOSE

The purpose of this annual General Plan Implementation and Adaptive Management Program (AMP) Report is to ensure that the City’s General Plan is being implemented effectively and towards achievement of its Vision, and to provide an opportunity through adaptive management for timely policy and implementation action adjustments, rather than infrequent, major reactive updates. This report provides an information feedback loop to City Council and the Planning Commission with the status of General Plan policies and implementation actions aimed toward meeting the Vision of a Sustainable Santa Barbara. This report also proposes policy adjustments and possible implementation measures, as needed.

## THE 2011 GENERAL PLAN VISION

The City’s 2011 General Plan was shaped through extensive community dialogue, which identified key community issues/concerns, or “Policy Drivers.” The Policy Drivers include: Growth Management; Energy and Climate Change; Historic and Community Character; Public and Community Health; and Economic and Fiscal Health. The General Plan responds to the Policy Drivers by providing direction through the General Plan Element goals, policies, and possible implementation actions to achieve the “Vision of a Sustainable Santa Barbara,” which is a statement of Santa Barbara’s desired future conditions, values, and characteristics.

Vision of a Sustainable Santa Barbara
<p>Santa Barbara strives to become a more sustainable community. All members of the Santa Barbara community are stewards, and we accept that responsibility with the understanding that change is inevitable, that perfection can only be pursued, that there will always be a dynamic tension between our many goals, and achieving a momentary balance between them is a never-ending challenge.</p> <p>The City, residents, businesses, developers and community organizations envision working together to achieve the following:</p> <p><b>Sustainability:</b> Becoming more sustainable by managing wise use of resources.</p> <p><b>Community Health:</b> Providing a physical environment that is healthy, and encourages healthy, active living.</p> <p><b>Environment:</b> Protecting and enhancing the scenic beauty of Santa Barbara’s natural setting and built environment which is intrinsic to our appreciation and enjoyment of the City. At the same time, improving on conservation of resources such as, energy, water, open space, and native habitat, through innovation and determination.</p> <p><b>Growth:</b> Managing growth within our limited resources, and in so doing, retaining the desirable aspects of the physical city without sacrificing its economic vibrancy and demographic diversity.</p> <p><b>Community Design:</b> Carrying on the tradition of preserving open space for public enjoyment, preserving historic buildings, and the continuity of emblematic architecture in new development and redevelopment.</p> <p><b>Historic Resources:</b> Preserving and enhancing historic resources now and in the future.</p> <p><b>Housing:</b> Allowing as much housing as possible within resource limits to provide an array of lifestyle options for a demographically and economically diverse resident population.</p> <p><b>Transportation:</b> Creating a diverse transportation network that serves our community’s economic vitality, small-town feel, a variety of housing options, economic stewardship, and healthy lifestyles.</p>

### Vision of a Sustainable Santa Barbara

**Public Services and Facilities:** Understanding that public services and facilities are limited resources, in particular with respect to financial considerations, explore technological solutions to safeguard, improve and expand the natural resources of Santa Barbara, while applying innovation to maintain or improve the quality of life and protect the natural environment.

**Economy:** Seeking stability through diversity, and balance between serving residents and visitors or non-resident investors, consistent with our environmental values and the need to be sustainable and retain unique character.

**Civic Participation:** Believing the best decisions are made with the greatest community participation. We know that full consensus is rare, but greater participation, where people have an opportunity to be heard and all opinions are respected, will achieve greater understanding, acceptance and appreciation which are so essential to our sense of community.

Over the next 20 years, these are the values for Santa Barbara to increasingly reflect in all its manifestations: physical, cultural and social, and through its General Plan.

## REPORT PREPARATION

This annual Report has undergone continuous development and revision with the content and format varying to highlight pressing topics and issues facing the City Council and the Planning Commission.

In 2014, the annual Report began including as an attachment the annual implementation status of 2011 General Plan Certified Final Program Environmental Impact Report (FPEIR) Mitigation Monitoring and Reporting Program (MMRP) Implementation Status Report (Appendix A) and the City's 2012 Climate Action Plan (CAP) Implementation Status Report (Appendix B). Taken together, the MMRP and CAP Implementation Reports provide an annual check on the City's progress towards implementing much of the 2011 General Plan's Vision.

In 2015, the annual report began including a Summary of Climate Change Legislation, Forecasted Future Effects, and Sea Level Rise Studies (Appendix C) as an update to Figure ES-2 from the CAP to track the continually progressing data and legislation.

In 2016, the Report mainly focused on the status of the Average Unit-Size Density (AUD) Incentive Program and recommended considerations for General Plan format, text, and/or policies identified as needing review and possible adjustment, as well as recommending updates to the 2011 General Plan Certified FPEIR. The 2016 Report also briefly summarized the implementation status of community design and historic resources, economic and fiscal health, and civic participation policies.

The 2017 Report was streamlined to primarily focus on particular indicators of sustainability and the relationship between transportation, the jobs/housing balance, non-residential growth and housing. It also included a detailed report on the update to the community-wide Greenhouse Gas (GHG) inventory. Starting in 2017, the Report did not include the brief summary of implementation status of community design and historic resources, economic and fiscal health, and civic participation policies due to the effort to streamline and focus the report on the major topics, and status updates on these policies are available through other formats. The 2017 Report did however identify and suggest possible adjustments and new work efforts for consideration for programming and funding.



In April 2018, staff met with the Planning Commission to discuss the focus of the 2018 Report and recommended a review of the 2011 General Plan against the Governor's Office of Planning and Research's (OPR) newly released 2017 General Plan Guidelines, with a focus on resiliency. This topic is timely given new state statutory requirements for general plans and the Thomas Fire and Montecito Debris Flow disasters experienced in the community over the winter of 2017 and 2018. As discussed with the Planning Commission, the other focus of the 2018 report is growth management, with the detailed housing statistics provided in the annual Housing Development Activity Report & Housing Element Implementation Report.

## SUMMARY OF REPORT FINDINGS

### General Plan Evaluation

The 2018 Report focuses on the newly released OPR General Plan Guidelines and also reviews how our current policies include resiliency efforts. The City's General Plan complies with most of the items on OPR's Completeness Checklist and Required Contents and Statutory Requirements for general plan elements. Although some of the City's General Plan elements could be strengthened, additional data gathered, and mapping completed or updated. Throughout the Report there are a possible work items identified that would further the community toward the General Plan's Vision, improve the usability of the document, and more completely implement the 2011 General Plan Certified FPEIR's mitigation measures and the CAP.

### Growth Management

The 2018 Report focuses on three growth management topics: The Jobs/Housing Imbalance, Nonresidential Development, and Residential Development. The results of this analysis is summarized below:

#### **The Jobs/Housing Imbalance**

- The Jobs/Housing Imbalance remains a critical issue in Santa Barbara.
- The ratio of total jobs to total housing units has improved from the 2011 General Plan Certified FPEIR baseline. However, this improvement may be due to limitations in the methodology used to develop the ratio, rather than changes in the on the ground conditions.
- The number of workers who live in the South Coast and work in Santa Barbara is nearly unchanged from the 2011 General Plan Certified FPEIR baseline. However, fewer workers employed in Santa Barbara live in the South Coast than have historically.

#### **Nonresidential Development**

- Nonresidential development is occurring in the locations prioritized by the 2011 General Plan and Growth Management Program (GMP). It is anticipated that this trend will continue into the future.
- The nonresidential growth limits established by the GMP may have a minimal impact on nonresidential development because the rate of nonresidential growth has been less than anticipated when the development limits are annualized (with the exception of the

Community Benefit Category, which has matched the annualized limit, due to one large project).

### Residential Development

- There is an increase in total residential development activity. However, this development is within the rate of growth assumed in the 2011 General Plan Certified FPEIR and in the 2015 Housing Element.
- Due to changes in the State Accessory Dwelling Unit (ADU) law and the City's subsequent Title 30 Zoning Ordinance amendments to permit ADUs, there has been a significant increase in the volume of ADU projects.
- Residential development is generally occurring in the locations prioritized by the 2011 General Plan. However, there was a recent increase in the number of units built and occupied in single unit zones due to the increase in ADU projects.
- Since the Redevelopment Agency was dissolved, there has been a decrease in the amount of Affordable housing units built and occupied each year, with minimal production over the last five years. However, the Affordable projects in the pipeline may help reverse this trend.
- There has been a stagnation in the Average-Unit Size Density (AUD) Incentive Program since the first quarter of 2017. Since then, some projects have advanced through the development process, while others have expired or been withdrawn.

### Format and Content Consideration

The 2018 Report carries forward this analysis from the 2017 Report, which determined that the "Possible Implementation Actions to be Considered" heading creates confusion about the status of implementation items and recommends modifying this heading.

## IDENTIFIED PRIORITY WORK ITEMS

### Status of Prior Work Items

Since 2015, the annual Report has included staff's recommended priority work items based on a review of the General Plan's implementation actions and other workload priorities. Table 1 provides a summary of the recommendations and current status.

**Table 1: Status of Prior Work Items**

Report Year	Work Item	Status
2015	Consider amending the Average Unit-size Density (AUD) Incentive Program to increase off-street parking requirements for projects not in the Downtown Zone of Benefit	Scheduled for FY 2018
	Update the GHG Inventory	Completed in 2017
	Develop Sustainable Neighborhood Plans (Land Use Element LG15 and 15.1)	No work effort to date
2016	Study the existing Transfer of Existing Development Rights Ordinance and the disposition of future demolished nonresidential square footage that is not rebuilt	No work effort to date

	Update the GHG Inventory	Completed in 2017
<b>2016 &amp; 2017</b>	Modify the “Possible Implementation Actions to be Considered” heading in future General Plan updates	Consider for next General Plan update
	Update the 2011 General Plan Certified FPEIR to address new State and federal regulations and updated information on conditions and resource impacts	Scheduled for FY 2020
<b>2017</b>	Update the Climate Action Plan (CAP) to meet new GHG emission reduction targets	On the work program list but not scheduled or budgeted
	Implement sustainable transportation programs identified in General Plan policies, the MMRP, and 2012 CAP as proposed by the Public Works Transportation Division as a part of the Capital Improvement Program Fund	Projects are completed as funding is made available
	Update the traffic model at periodic intervals	Traffic model was last updated in 2016. Funding is collected to conduct periodic updates.

The identified following list of priority work items have the greatest potential to assist the City achieve the goals and objectives laid out in the 2011 General Plan. Each of these may require substantial capital investment and other resources.

## New Priority Work Items

### **Update the CAP and prepare a comprehensive Adaptation Plan**

Update the 2012 CAP and prepare a comprehensive Adaptation Plan to establish new GHG emission targets consistent with State legislation, collaborate regionally on climate change mitigation and adaptation, include updated GHG emission projections, incorporate more aggressive GHG emission reduction strategies, examine the CAP’s existing GHG emission reduction strategies for relevance, determine how the City will transition to 100% renewable energy use by 2030, and remain compliant with the Global Covenant of Mayors requirements.

### **Update the Environmental Resources/Conservation Element**

Update the Conservation Element that was first adopted in 1979 and has outdated policies. Updating this element is particularly important in the light of the recent comprehensive update of the Coastal Land Use Plan (LUP), which includes detailed policies and development standards for environmentally sensitive habitat areas of the Coastal Zone including creek setback buffers. In the inland areas of the City, the majority of the creek setbacks, except for Mission Creek, are determined on a case-by-case basis, leading to a high degree of uncertainty and delays in the permitting process. It is imperative to continue protecting creeks, wetlands, and other habitats that are especially rare or valuable, and continue the momentum for

the level of protection that began with the Coastal Zone to the inland areas of the City, parts of which contain relatively pristine creeks and other habitats in the upper, less developed reaches of the City limits.

**Update the Safety Element**

Review and update the Safety Element to include consolidation of the multiple sources of flood mapping and policies, update and expand the discussion about climate change adaptation and resiliency to include other climate change indicators such as wildfires, stream flooding, extreme heat, prolonged drought, and public health, include appropriate cross references and summaries of other City documents, and to comply with statutory requirements to review and potentially update the Safety Element when other documents are updated.

**Land Use Element Reporting**

In the next General Plan Implementation Report (2019), conduct and document the annual review of the Land Use Element for those areas covered by the plan that are subject to flooding identified by FEMA or the Department of Water Resources.

# General Plan Evaluation

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## BACKGROUND

Cities and counties in California are required to have an operating general plan to address physical development. While charter cities such as Santa Barbara are exempt from some state land use law, all cities and counties, including charter cities, must have a general plan containing, at a minimum, the required components of the mandated elements, discussed in more detail below. To assist local governments in preparing general plans, the Governor's Office of Planning and Research (OPR) provides and periodically revises guidelines for the preparation and content of local general plans.

In 2011, the City of Santa Barbara adopted a general plan update, followed by individual element updates, culminating in eight reorganized elements as follows:

1. Land Use (2011 update);
2. Housing (2015 update);
3. Open Space, Parks, and Recreation (2011 new goals, policies, and implementation actions plus 1972 existing Open Space Element, and 1982 existing Parks and Recreation Element);
4. Economy and Fiscal Health (new 2011 element);
5. Historic Resources (new 2012 element);
6. Environmental Resources (2011 new goals, policies, and implementation actions plus 1979 existing Conservation Element and 1979 existing Noise Element);
7. Circulation (2011 new goals, policies, and implementation actions plus 1997 existing Circulation Element); and
8. Safety (2013 update).

In 2016, the state adopted an amendment to Government Code §65302 that added to the required elements of the general plan either an environmental justice element, or related goals, policies, and objectives integrated into other elements, if the jurisdiction has a disadvantaged community (the definition of disadvantaged communities and other related funding provisions for disadvantaged communities and low-income communities are described on pages 26 - 28). In 2017, OPR released an updated version of the General Plan Guidelines, including detailed information on statutory requirements of the mandated general plan elements and complying with the new environmental justice mandate. Accordingly, this section of the 2018 General Plan Implementation and AMP Report provides an opportunity to evaluate the City's updated and reorganized general plan elements and policies to the OPRs "Completeness Checklist" of statutory requirements in the 2017 General Plan Guidelines. This evaluation will determine if the 2011 General Plan's data collection and "evolving set of policies that can adjust to new issues" should be modified to meet state mandates, to respond to new state and local planning priorities, or to react to emerging climate change indicators or other physical changes in the City.

# STATE OF CALIFORNIA 2017 GENERAL PLAN GUIDELINES

The OPR is required by Government Code §65040.2 to adopt and periodically revise the State General Plan Guidelines (GPG) for the preparation and content of general plans for all cities and counties in California. The GPG serves as the “how to” document for cities and counties that are drafting or updating their general plans.

In 2017, OPR released the 2017 edition of the General Plan Guidelines, which is the first comprehensive update to the guidelines since 2003. Legislative changes, new technical advisories, guidance documents, and additional resources were incorporated into the new GPG. Major changes include:

- Statutory checklists for all mandatory elements;
- Updated and expanded sections on visioning and community engagement;
- New sections on healthy communities, equitable and resilient communities, economic development, and climate change; and
- Incorporation of existing legislative changes and guidance.

For mandatory and common optional elements of the general plan, the GPG sets out each statutory requirement in detail, provides OPR recommended policy language, and includes online links to City and county general plans that have adopted similar policies.

Updated General Plan Guidelines were not available when the City was undergoing its multi-year *Plan Santa Barbara* General Plan Update process. The release of the 2017 GPG update provides an opportunity to compare the 2017 GPG statutory requirements and recommended policies to the City’s General Plan and develop recommendations as part of the City’s Adaptive Management Program.

## California’s Planning Priorities

California’s planning priorities, intended to inform planning and investment at all levels in government, were first articulated in 1987 and adopted in law in 2002. The state’s priorities, summarized below, are generally consistent with the City’s Vision of a Sustainable Santa Barbara:

- Promote infill development and rehabilitation and utilization of existing infrastructure, including water, sewer, and transportation;
- Protect the state’s natural and working lands, including agricultural land, lands of cultural and historic significance, wetlands, and wildlands; and
- Develop in an efficient manner that limits sprawl and minimizes costs to taxpayers.

Similar to the planning priorities, OPR is directed to maintain an Environmental Goals and Policy Report (EGPR). The most recent EGPR of 2015 provides a strategy for California at a population of 50 million by the year 2050. The effective growth and management strategies in the EGPR include:

- Prioritize and support infill development to build healthy, equitable, and sustainable communities;
- Build a resilient and sustainable water system;

- Steward and protect natural and working landscapes;
- Incorporate climate change adaptation into all planning and investment; and
- Lead by example to make the state a model for long-term sustainability.

# REQUIRED GENERAL PLAN ELEMENTS

## Introduction

### Background

California law requires each general plan to address mandated elements listed in Government Code §65302. The mandatory elements for all jurisdictions are:

- Land Use
- Circulation
- Housing
- Conservation
- Open Space
- Noise
- Safety

Cities and counties in the San Joaquin Air Pollution Control District are also required to address air quality in their general plan and cities and counties that have identified disadvantaged communities must also address environmental justice in their general plans, including air quality. See the Environmental Justice Element heading below for more discussion.

## Land Use Element

### Background

The most fundamental decisions in planning begin with land use. The City's Land Use Element contains goals, policies, and implementation actions related to the four topics of Land Use, Growth Management, Community Design, and Neighborhoods. Per Government Code §65302 (a), a land use element designates the proposed general distribution and general location and extent of the uses of land for housing, business, industry, open space, natural resources, recreation, and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities, greenways (as defined in Section 816.52 of the Civil Code), and other categories of public and private uses of land. As mentioned above, the 2017 General Plan Guidelines includes a Completeness Checklist to help ensure that the land use element addresses all required issues. Table 2 shows the result of comparing the City's 2011 Land Use Element to the 2017 Completeness Checklist.

**Table 2: Land Use Element Completeness Checklist**

Brief Description of Requirement	Compliance
<b>General distribution, location, and extent of:</b>	
<b>Housing, business, industry, and public facilities</b>	

Density and intensity	√
Potential for flooding impacts	Partial (see discussion below)
<b>Open Space (natural resources, recreation, scenic resources)</b>	
Location	√
Potential for flooding impacts	Not included
<b>Education</b>	
Density and intensity	Partial (See discussion below)
Potential for flooding impacts	Not included
<b>Solid and liquid waste disposal</b>	
Density and intensity	Partial (See discussion below)
<b>Timberland production</b>	N/A
<b>Other categories of public and private uses of land</b>	N/A, no other categories identified
<b>Greenways, as defined in Civil Code Section 816.52</b>	Not included
<b>Identify areas subject to flood plain mapping and annually review</b>	Partial (See discussion below)
<b>Impact on military land use compatibility and readiness</b>	N/A
<b>Correlation with the Circulation Element</b>	√
<b>Includes a diagram or diagrams</b>	√

### Discussion

Based on a review of OPR's Completeness Checklist as well as Required Contents and Statutory Requirements of the Land Use Element, the 2011 Land Use Element generally complies with most of the items in the checklist, with some issues identified as needing more data or elaboration, particularly on the issue of flooding.

#### *Potential for flooding impacts*

In 2007, Assembly Bill 162 amended sections of the Government Code related to local planning, which created overlapping requirements for flooding issues in the land use, conservation, and safety elements as follows:

- Require the Land Use Element to identify and annually review those areas covered by the general plan that are subject to flooding as identified by flood plain mapping prepared by the Federal Emergency Management Agency (FEMA) or the Department of Water Resources;
- Require, upon the next revision of the Housing Element, on or after January 1, 2009, the Conservation Element to identify rivers, creeks, streams, flood corridors, riparian habitat, and land that may accommodate floodwater for purposes of groundwater recharge and stormwater management; and



- Require, upon the next revision of the Housing Element, on or after January 1, 2009, the Safety Element to identify, among other things, information regarding flood hazards and to establish a set of comprehensive goals, policies, and objectives, based on specified information for the protection of the community from, among other things, the unreasonable risks of flooding.

In the City's General Plan, flooding issues are mainly discussed in the Environmental Resources Element, Conservation Element, and Safety Element. For example, the General Plan Flood Map is included in the 2011 Environmental Resources Element, the 1979 Conservation Element includes a general discussion of flooding potential per creek and includes the number of structures that are within the limits of the 100-flood (for Mission Creek only), and the 2013 Safety Element includes a general discussion of creek flooding potential in neighborhoods.

The following OPR-Recommended Data regarding flooding are missing from the Land Use Element:

- Identification of waterways used in flood management; and
- Identification of potential for flooding impacts per land use designation.

While the City's various general plan elements include text, maps, goals, policies, and implementation actions regarding flooding, the relationship between this information and land use is not clear and it is difficult to determine in a cursory review if the information provided meets the intent of the statutory requirements. There is no documentation of an annual review of the Land Use Element for those areas covered by the plan that are subject to flooding identified by FEMA or the Department of Water Resources. For further discussion on this topic, see the Safety Element section.

#### *Education*

The recommended information regarding education that is currently provided in the City's Land Use Element includes public schools, which are designated an institutional land use, described by name and site size in text, and located on the General Plan Map. In addition, the 2011/1997 Circulation Element includes multiple policies for school locations and transportation safety.

The following OPR-Recommended Data are missing from the Land Use Element:

- Identification of private schools, preschools, career colleges, adult education centers, and the like, on the General Plan map;
- School population data;
- Future educational facility needs; and
- Details regarding joint use arrangements.

#### *Solid and Liquid Waste Disposal*

The El Estero Wastewater Treatment Plant is identified on the General Plan Map and generally described. However, there is very little additional information regarding solid and liquid waste disposal in this or any other element of the General Plan.

The following OPR-Recommended Data are missing from the Land Use Element:

- Inventory of existing solid waste disposal, recycling, anaerobic digestion, remanufacturing, and composting facilities to aid compliance with the Countywide Integrated Waste Management Plan and other associated laws;
- Consideration of infrastructure needed to recover edible food waste; and
- Need for additional recycling, anaerobic digestion, composting, and remanufacturing facilities.

### **Recommendation**

In 2007, the state legislature has passed a bill to ensure that local planning agencies consider and plan for the risk of floods as they prepare their general plans. As stated in the bill analysis, there were several events that led to the emphasis on flood management, including levee failure, heavy storms and flooding in the 2005-2006 rainy season, and the devastation wrought by Hurricane Katrina. The City's existing and proposed policies and programs likely address flood management to the extent envisioned by the legislature, but within the City's General Plan the topic is addressed in several elements without cross references and it's difficult to determine if they are internally consistent or fully compliant with state requirements. See the Safety Element recommendation section for further discussion on this topic.

*To be completed in the near term:*

- As part of the General Plan Implementation Report, conduct and document the annual review of the Land Use Element for those areas covered by the plan that are subject to flooding identified by FEMA or the Department of Water Resources.

*For the next update to the Land Use Element, which is not programmed at this time, it is recommended to:*

- Amend the General Plan Map to identify private schools, preschools, career colleges, and adult education centers;
- Research and include more data on educational facilities including consideration of the items listed above as missing from the Land Use Element, and develop new policies for educational facilities as needed;
- Add a section and consider policies for liquid and solid waste disposal facilities, including consideration of the items listed above as missing from the Land Use Element; and
- Consider amending the General Plan open space land use designation to match the Government Code definition of open space (see the Open Space Element section for more information).

## **Circulation Element**

### **Background**

The comprehensive goal and vision of the City's Circulation Element is to ensure Santa Barbara is a city in which alternative forms of transportation and mobility are so available and attractive, that use of an automobile is a choice rather than a necessity. The City's Circulation Element was adopted in 1997, with a number of new goals, policies, and implementation actions added in 2011 as part of the General Plan update process, including several 2011 General Plan Certified FPEIR mitigation measures. Per Government Code §65302(b), the Circulation Element consists of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, military airports and ports, and other local public utilities and facilities, all correlated with the Land Use Element. The 2011 goals, policies, and

implementation actions are not considered a substantial update to the Circulation Element, but, together with the 1997 goals, policies, and implementation actions, they do comply with the California Complete Streets Act of 2008<sup>1</sup>. Table 3 shows the result of comparing the City's 2011/1997 Circulation Element to the 2017 Completeness Checklist.

**Table 3: Circulation Element Completeness Checklist**

Brief Description of Requirement	Compliance
<i>General location and extent of existing and proposed:</i>	
<b>Major thoroughfares</b>	√
<b>Transportation routes</b>	
Public transportation	√
Bicycle	√
Pedestrian	√
Automobile	√
Commercial goods	√
<b>Existing and proposed terminals (i.e., airport, train station, bus station)</b>	√
<b>Military airports and ports</b>	N/A
<b>Other local public utilities and facilities (i.e., water, sewers, storm-water systems, telecommunications and broadband, electric vehicle charging stations, electricity, and natural gas lines)</b>	Partial (See discussion below)
<b>Needs of children, persons with disabilities, and seniors</b>	√
<b>Identified funding for infrastructure</b>	Partial (See discussion below)
<b>Correlated with Land Use Element</b>	√

### Discussion

Based on a review of OPR's Completeness Checklist as well as Required Contents and Statutory Requirements of the Circulation Element, the 2011/1997 Circulation Element satisfies Government Code §65302(b) as well as the statutory requirement to meet the California Complete Streets Act of 2008. Furthermore, the 2011 Circulation Element goals, policies, and implementation actions were developed in part to mitigate the environmental impacts of growth as reflected in the 2011 Land Use Element. Because the Circulation Element is a little dated, there are a few topics that are only partially addressed including:

- The public utilities chapter, which does not address new technologies; and

<sup>1</sup> Beginning January 2011, any substantive revision of the circulation element requires complete streets provisions, meaning plans for a balanced multimodal network that meets the needs of all users of streets, roads, and highways for safe and convenient travel. The City's 2011/1997 Circulation Element meets the intent of the act.

- Electric vehicle charging stations and other alternative fuel infrastructure, not discussed in the Circulation Element, but addressed elsewhere in the 2011 Environmental Resources Element and 2012 Climate Action Plan.

Where the Circulation Element does however lack detail is how the large number of unfunded implementation actions will be executed. On this topic, a recent appellate court case explained “the circulation element of a general plan must provide meaningful proposals to reflect changes in the land use element, and the land use element must provide meaningful proposals to reflect changes reflected in the circulation element”. A proposal is “meaningful” if the element identifies reasonably reliable funding sources. An element that identifies proposals with no reasonable expectations of implementation (i.e., funding) is not meaningful, and therefore would not satisfy the statutory correlation requirement (*Federation of Hillside & Canyon Assns. V. City of Los Angeles* (2004) 126 Cal. App. 4<sup>th</sup> 1180, 1196).

### **Recommendation**

Implementation of the Circulation Element over time has resulted in other, more specific transportation planning documents, such as the Pedestrian Master Plan and Bicycle Master Plan, and key projects from these and other plans are programmed for implementation in the City’s Capital Improvement Program (CIP). Typically, these projects require grant funding to accomplish.

*For the next update to the Circulation Element, which is not programmed at this time, it is recommended to:*

- Prioritize implementation actions, correlated with land use element policies;
- Identify reasonably reliable funding sources for implementation projects;
- Identify specific gaps in transportation network connectivity;
- Include and update maps to show transit, bicycle and pedestrian infrastructure, and major destinations (existing Circulation Element only has two maps: existing street system and existing bikeway network);
- Identify target areas for policies incentivizing transit use by identifying major employment centers, existing and planned transit routes, residential areas with demographic information, schools, and recreation areas;
- Update public utilities information and policies, cross reference to the relevant energy conservation policies in the Environmental Resources Element; and
- Update policies to include resiliency plans in relationship to working with other regional and local government to repair transportation systems after the event of a disaster.

## **Housing Element**

### **Background**

Providing adequate housing for all residents is a priority for cities and counties throughout California, including Santa Barbara. Provisions in the Housing Element are more specific and directive than other elements and the Department of Housing and Community Development (HCD) has unique authority over the Housing Element. Senate Bill 375, adopted in 2008, established an eight-year update cycle for housing elements concurrent with every other update to the Regional Transportation Plan. The City’s Housing Element addresses the 2015 to 2023 planning period. Table 4 shows the result of comparing the 2015 Housing Element to OPR’s 2017 Completeness Checklist.

**Table 4: Housing Element Completeness Checklist**

<b>Brief Description of Requirement</b>	<b>Compliance</b>
<b>Public participation – description of effort to include all economic segments of the community</b>	√ (See discussion below)
<b>Review and revise progress, effectiveness, and appropriateness of goals</b>	√
<b>Housing needs assessment</b>	√
<b>Identification and analysis of any special housing needs</b>	√
<b>Inventory of at-risk units (10 years from housing element due date)</b>	√
<b>Potential governmental constraints</b>	√
<b>Potential non-governmental constraints</b>	√
<b>Sites inventory and analysis</b>	√
<b>Quantified objectives and housing programs</b>	√
<b>Schedule of specific actions and timeline for implementation</b>	√
<b>Program(s) providing adequate sites to accommodate RHNA</b>	√
<b>Program(s) to assist in the development of housing for extremely low, very low, low, and moderate income households</b>	√
<b>Program(s) to address governmental constraints</b>	√
<b>Program to remove constraints on housing for persons with disabilities and provide reasonable accommodation</b>	√
<b>Program(s) to conserve and improve the condition of the existing affordable housing stock</b>	√
<b>Program(s) to promote housing opportunities for all persons</b>	√
<b>Program(s) to preserve at-risk units</b>	√
<b>Other Requirements</b>	
Description of general plan consistency	√
Review by HCD and legislative body	√
Analysis of construction, demolition and conversion of housing for lower income households in the Coastal Zone	√
Description of opportunities for energy conservation in residential development	√
Water and sewer priority	√ (See discussion below)
Housing accountability act; analysis for rejection	N/A (See discussion below)

## Discussion

Based on a review of OPR's Completeness Checklist as well as Required Contents and Statutory Requirements of housing elements, the 2015 Housing Element generally complies with the items in the checklist, with some issues identified as needing more data or elaboration.

The City's outreach and participation efforts entailed a variety of methods including informational emailing and mailing, community workshops, and grass roots meetings. Improvements could be made in efforts to better target all economic segments of the community, with bilingual notices and Spanish-translated workshops.

### *Water and Sewer Priority*

Senate Bill 1087 requires local governments to provide a copy of the adopted Housing Element to water and sewer providers and requires water and sewer providers to grant priority for service allocations to proposed developments that include housing units affordable to lower-income households. Because the FPEIR for the *Plan Santa Barbara General Plan Update* concluded that there is adequate water and sewer capacity to accommodate growth anticipated under the General Plan, including for housing units affordable to lower-income households, there is no need at this time to prioritize allocations. Additionally, the City's Urban Water Management Plan includes projected water use for lower income households in compliance with this requirement.

### *Housing Accountability Act*

This "Other Requirement" from the Completeness Checklist is a reference to Senate Bill 167 and a local agency's compliance with the Housing Accountability Act, which was amended in 2017 and prohibits denial of housing development projects for very low, low-, or moderate-income households or emergency shelters unless specific written findings are documented. This item will be an important aspect of annual reporting to HCD on the Housing Element, but it's not directly related to this review of the City's 2015 Housing Element to the Completeness Checklist.

## Recommendation

*At the next update to the Housing Element, scheduled for 2023*

- Expand the outreach process to better engage all economic segments of the community.

## Conservation Element

### Background

The comprehensive goal of the City's policies on conservation are to protect and maintain a healthful natural environment which reflects a balance between human activities and the natural environment. Conservation of environmental and agricultural resources is one of the State's three planning priorities and Government Code §65302(d) requires that the conservation element consider the effect of development on natural resources. Based on a review of OPR's Completeness Checklist, the General Plan contains largely complying items in the Open Space Element, Conservation Element, Circulation Element, Environmental Resources Element, Open Space, Parks and Recreation Element, and Safety Element, with some issues that do not apply to the built environment of the City. Table 5 shows the result of comparing

the City's 1979/2011 Conservation Element/Environmental Resources Element (CE), 1997/2011 Circulation Element (CIRE), 1972/2011 Open Space/Open Space, Parks and Recreation Element (OSE), and the 2013 Safety Element (SE) to the 2017 Completeness Checklist.

**Table 5: Conservation Element Completeness Checklist**

Brief Description of Requirement	Compliance
<b>Water and its hydraulic force (water conservation, water supply and demand)</b>	√ (CE)
<b>Floodwater accommodation</b>	√ (CE and SE)
<b>Forest (conservation, risk of wildfire)</b>	√ (CE, OSE, and SE)
<b>Soils (management and conservation, agricultural production)</b>	√ (CE)
<b>Rivers and other waters (water quality)</b>	√ (CE)
<b>Harbors</b>	√ (CE and CIRE)
<b>Fisheries (management)</b>	√ (CE)
<b>Wildlife (conservation, habitat)</b>	√ (CE)
<b>Minerals (inventory, protection)</b>	N/A (See discussion below)
<b>Other natural resources</b>	√ (CE and OSE)
<b>Reclamation of lands and waters (optional)</b>	N/A (See discussion below)
<b>Pollution of stream channels and other areas (optional)</b>	√ (CE and OSE)
<b>Land use in streams and other waters (optional)</b>	√ (CE, OSE, and SE)
<b>Erosion of soils, beaches, and shores (optional)</b>	√ (SE)
<b>Protection of watersheds (optional)</b>	√ (CE and OSE)
<b>Rock, sand, and gravel resources (optional)</b>	√ (CE)

#### Discussion

Based on a review of OPR's Completeness Checklist as well as Required Contents and Statutory Requirements of the Conservation Element, the items in the checklist are mostly addressed in the multiple elements listed above. The minerals resources requirement, which calls for policies that plan for the protection, use, and development of mineral resources, is not applicable to the City. The optional topic of reclamation of land and waters also is not applicable to the City.

The City's Conservation Element also addresses additional topics not included in the statutory requirements for conservation elements. There is a section on Visual Resources, which focuses on resources (creeks, hillsides, trees, open space) as visual amenities, and an Air Quality section.

#### Recommendation

While the statutory requirements seem to be met, it is confusing for these topics to be addressed in multiple elements without any cross referencing or internal consistency analysis. Also, as the majority of the topics listed above and resultant policies are based on a Conservation Element that dates back to

1979, the entire element needs updating to remain relevant. Although largely built out and urban in character, the City contains substantial areas of relatively undisturbed native habitats and maintaining its natural resources is integral to the City's sustainability principles. Updating this element is particularly important in the light of the recent comprehensive update of the Coastal Land Use Plan (LUP), adopted by City Council in August 2018. The Coastal LUP includes detailed policies and development standards for biological resources in the City's Coastal Zone, including numeric creek buffers (setbacks). Inland of the Coastal Zone, creek setbacks (except for Mission Creek) are determined on a case-by-case basis, leading to a high degree of uncertainty and delays in the permitting process. It is imperative to continue protecting creeks, wetlands, and other habitats that are especially rare or valuable, and continue the momentum for the level of protection that began with the Coastal Zone to the inland areas of the City, parts of which contain relatively pristine creeks in the upper, less developed reaches of the City limits.

An update to the Environmental Resources Element is one of the Planning Division's future work items and has been on the list for some time, but it has not been programmed or funded. While there is not a high level of new development proposed in the lower density residential areas of the City, an update to this element should be considered a priority work item for the following reasons:

- State legislation, such as the 2017 amendments to the Government Code relating to accessory dwelling units (ADUs), removed some of the City's discretion for permitting ADUs. Without established creek buffers and/or other development standards to protect biological resources, ADUs (or other similar state efforts to increase housing) could potentially impact sensitive resources;
- As recommended in OPR's guidance, the Conservation Element should balance community needs with environmental preservation and the effects of climate change. The existing policies do not address adaptation to climate change; and
- While the FPEIR for the Plan Santa Barbara General Plan Update contains updated data and mapping for biological resources, this information has not yet been integrated into the General Plan.

## Open Space Element

### Background

Santa Barbara residents and visitors have always cherished the open space and recreational opportunities found within the City and nearby areas. Due to the fact that the City is essentially built-out, it is critical to preserve and enhance open space. California legislative policy also strongly favors the preservation of open spaces and Government Code §65560 sets forth guidelines for open space preservation. Based on a review of OPR's Completeness Checklist, the 2011 Open Space, Parks and Recreation Element complies with most items. Table 6 shows the result of comparing the City's 1979/2011 Conservation Element/Environmental Resources Element (CE), 1997/2011 Circulation Element (CIRE), 1972/2011 Open Space/Open Space, Parks and Recreation Element (OSE), 2011 Land Use Element (LUE), and 2013 Safety Element (SE) to the 2017 Completeness Checklist.



**Table 6: Open Space Element Completeness Checklist**

Brief Description of Requirement	Compliance
<b>Plan for preservation and conservation of open space lands and inventory for:</b>	
Natural resources (preservation of plant and animal life, habitat for fish and wildlife species)	✓ (CE and OSE)
Managed production of resources (forest lands, groundwater recharge, areas important for management of commercial fisheries, areas containing major mineral deposits)	✓ (CE) (See discussion below)
Outdoor recreation	✓ (OSE, CIRE, and LUE)
Public health and safety (earthquake fault zones, unstable soil areas, floodplains, watersheds, high fire hazard, protection of water quality and reservoirs)	✓ (SE) (See discussion below)
Military support	N/A
Tribal resources (public land containing Native American cultural sites, ruins, rock art etc.)	N/A (See discussion below)
<b>Policies provide that open space “must be conserved wherever possible”</b>	✓ (CE and OSE)
<b>Co-ordinated with state and regional plans</b>	✓ (OSE) (See discussion below)
<b>Includes an Action Plan</b>	✓ (CE and OSE)

## Discussion

### *Inventory*

As shown above, the Government Code requirements for the Open Space Element are mostly fulfilled via a multitude of overlapping policies in several City elements. What seems to be missing is an inventory and map of the City’s open space lands that complies with the definition of open space in Government Code §65560(b) as “any parcel or area of land or water that is essentially unimproved and devoted to open space use.” Conversely, the City’s General Plan includes different and expanded designations/categories of open space as follows:

- 2011 Land Use Element designates and maps open space to include the shoreline, parks, creeks, and Goleta Slough Natural Reserve;
- The 1972 Open Space Element includes the ocean, mountains, major hillsides, creeks, shoreline, major parks, and the freeway (Highway 101) as categories of open space; and
- The 1979 Conservation Element discusses significant areas of open space and/or visual features to include the Wilcox property (Douglas Family Preserve), major creeks, the shoreline, Montecito Golf Course, Andrée Clark Bird Refuge, Clark Estate (Bellosguardo), and Child’s Estate (Santa Barbara Zoo). The Conservation Element tends to emphasize open space for important scenic/visual resource values, rather than for conservation of natural resources.

OPR’s guidance further elaborates that the inventory should include any parcel in one of the listed categories that is (1) “essentially unimproved” and (2) designated on any local, regional, or state open-space plan. A particular parcel need not be completely vacant to be included in the inventory.

Once this inventory has been completed it would be beneficial to review which properties provide valuable fire breaks between steep slopes and existing neighborhoods. These parcels could be targeted for acquisition or further maintenance by the Fire Department as a valuable resource in the ability to fight wildfires near the City.

#### *Managed Production of Resources*

The City of Santa Barbara is mostly built-out and does not produce natural resources. OPR's guidance does however recommend an inventory of areas required for recharge of groundwater basins. The Conservation Element has policies related to monitoring groundwater resources but areas required for recharge are not inventoried or mapped.

#### *Open Space for Public Health and Safety*

The open space inventory should include areas that require special management or regulation because of hazardous or special conditions. Policies exist to address most of the hazardous conditions specifically identified in the statute including: the Environmental Resources Element/Conservation Element for floodplains and areas required for protection of water quality and water reservoirs; and the Safety Element for earthquake fault zones, unstable soil areas, and areas presenting high fire risks. These areas however are not inventoried or mapped in the Open Space Element as directed by the OPR's checklist.

#### *Open Space for Tribal Resources*

When the General Plan was updated in 2011, consultation with the appropriate tribes was conducted in accordance with Government Code §65352. As a result of that process, there appears to be no identification of tribal resources to be protected.

#### *Coordinated with state and regional plans*

The Open Space Element includes policies speaking to regional cooperation and coordination with the County of Santa Barbara, Goleta, and Carpinteria, yet no policies currently exist in regards to coordinating with state agencies.

### **Recommendation**

*.For the next update to the Open Space Element, which is not programmed at this time, it is recommended to:*

- Prepare an inventory and map:
  - Open space as defined in the Government Code;
  - Open space areas necessary for recharge of groundwater basins;
  - Open space areas that require special management or regulation because of hazardous conditions;
  - Open spaces areas prioritized for fire-breaks; and
  - Areas that should be considered for future acquisition as publicly owned open space.

An update to Open Space Element should trigger another consultation with the appropriate tribes and coordination with relevant state agencies.

## Noise Element

### Background

The City's Noise Element was adopted in 1979 in two sections: the first section, the Policy Report, is concerned with the implications of the technical findings for noise control. The second section, the Technical Report and Appendices, contain the quantitative estimates of existing and forecasted noise levels in the City. Together, these two sections constitute the Noise Element, housed within the umbrella of the Environmental Resources Element. Further policies related to noise were incorporated in the 2011 Environmental Resources Element based on a mitigation measure from the FPEIR for the *Plan Santa Barbara General Plan Update*. The FPEIR identified potential Class II noise impacts associated with siting new residential development in proximity to the U.S. Highway 101 corridor. Per Government Code §65302(f) and the suggested mitigation measure of the FPEIR, the City incorporated new noise policies into the 2011 Environmental Resources Element update. Table 7 shows the result of comparing the City's 1979 Noise Element/2011 Environmental Resources Element to the 2017 Completeness Checklist.

**Table 7: Noise Element Completeness Checklist**

Brief Description of Requirement	Compliance
<b>Identify and appraise noise problems in the community and quantify current and projected noise levels for all of the following sources:</b>	
Highways and freeways	√
Primary arterials and major local streets	√
Passenger and freight online railroad operations and ground rapid transit systems	√
Commercial, general aviation, and heliport ground facilities and maintenance functions related to airport operations	√
Local industrial plants (railroad stations)	√
Noise contour maps	√ (See discussion below)
Implementation measures and possible solutions	√ (See discussion below)

### Discussion

Based on a review of OPR's Completeness Checklist as well as Required Contents and Statutory Requirements of the Noise Element, the City's analysis of noise environment, stationary sources of noise, predicted levels of noise, and the impacts of noise on local residents is adequate.

OPR's Guidance states that the Noise Element must show contours for noise sources, to the extent practicable, in either Community Noise Equivalent Levels (CNEL) or Day-Night Average Level (Ldn). The 1979 Noise Element references noise contour mapping but the map was not included in the element or appendices, rather it was included in the Master Environmental Assessment (MEA) report. In 2003, updated noise contour mapping was conducted for the Santa Barbara Airport and is available on the Airport's webpage.

In 2008, the noise contour maps were updated to reflect 2008 transportation conditions in Ldn increments and included in the MEA Update (MEA Geospatial Data Update Noise Report, 2008). Stationary noise sources were not shown because noise from such sources is localized and cannot be described in detail on a citywide map. The FPEIR for the *Plan Santa Barbara General Plan Update* included a map of the updated City and Airport noise contours, also available in GIS format on the City's publicly-accessible Mapping Analysis & Printing System (MAPS), but it does not include the Airport.

Implementation measures and possible solutions are identified in the Noise Element. However, the provision for periodic review and revisions (review at least every two years and comprehensively revise every 5 years) has not occurred.

### Recommendation

The Noise Element is part of the City's Environmental Resources Element, which is identified for updating as a future work program item that is not yet funded or programmed. When the Environmental Resources Element is updated, the City should consider the following:

- Update the Noise Element as a standalone element for consistency with OPR's Guidelines; and
- Conduct updated noise contour mapping and include the map in the document to inform policy decisions.

## Safety Element

### Background

The City's original Seismic Safety/Safety Element was adopted in 1979 and addressed physical hazards related to geology, earthquakes, fire, and flooding. The 2013 Safety Element update addresses those issues plus hazards associated with the effects of climate change, hazardous material use, and public safety risks. It also provides information about public services provided by the City related to hazard and risk reduction programs, and describes emergency response planning programs should disaster occur. The Safety Element is a requirement of California Government Code §65302(g) to protect the community from any unreasonable risks associated with natural or human-caused disasters. Table 8 shows the result of comparing the City's 2013 Safety Element to the 2017 Completeness Checklist.

**Table 8: Safety Element Completeness Checklist**

Brief Description of Requirement	Compliance
Identification of unreasonable risks and policies for the protection of the community from such risks	√
Identification of slope instability	√
Identification of seismic risks and mapping of known seismic and geologic hazards	√

<b>Identification of flooding (including multiple requirements for mapping and data related to flood hazards<sup>2</sup>)</b>	√ (See discussion below)
<b>Identification of wildland and urban fires (including multiple requirements for mapping and data related to fire hazards<sup>3</sup>)</b>	√ (See discussion below)
<b>Additional requirements, for geologic and fire hazards address:</b> Evacuation routes Military installations Peakload water supply requirements Minimum road widths and clearances around structures	Partial (See discussion below)
<b>Climate Change Adaptation and Resilience (including a vulnerability assessment and requirements for how climate change may affect the risks of flooding and fire<sup>4</sup>)</b>	√ (See discussion below)
<b>Other considerations pertaining to floodplain management ordinances, consultation, and Safety Element review with Housing Element and Local Hazard Mitigation Plan updates</b>	Partial (See discussion below)

## Discussion

### *Flood Hazards*

The Safety Element statutory requirements regarding flooding hazards entails collecting a substantial amount of information concerning floodplains and watersheds. The Safety Element identifies three types of flooding hazards that have the potential to affect Santa Barbara: stream flooding when stormwater runoff overtops a creek's banks; coastal flooding caused by ocean tides, sea level conditions, and/or storm-generated waves; and the inundation of areas due to dam failures.

Regarding maps, the mapping requirement is generally met with multiple sources of maps located in the General Plan or elsewhere; however, the older maps do not use consistent terminology or state the data sources as shown below. The City's GIS MAPS application is the only source with the most up-to-date flood mapping information.

The Safety Element Technical Background Report (2013 General Plan Appendix J):

- City's Watersheds.
- 100-year Floodplains (2011).
- Coastal Storm Surge (from the General Plan FPEIR 2010).

<sup>2</sup> When the Housing Element is revised on or after January 1, 2009, the Safety Element is required to include extensive information on flood hazards, along with goals, policies, objectives, and feasible implementation measures based on the information provided as further elaborated in §65302(2).

<sup>3</sup> When the Housing Element is revised on or after January 1, 2014, the Safety Element must be reviewed and updated as necessary to address the risk of fire along with goals, policies, objectives, and feasible implementation measures based on the information provided as further elaborated in 65302(3).

<sup>4</sup> When the local hazard mitigation plan is revised on or after January 1, 2017, the Safety Element must be reviewed and updated as necessary to address climate adaptation and resiliency strategies, and feasible implementation measures as further elaborated in 65302(4).

## Environmental Resources Element

- General Plan Flood Map (2011).

## Conservation Element

- Flood/Fire Hazard & Tsunami Run-up (1979?).

Santa Barbara Annex to the Multi-Jurisdictional Hazard Mitigation Plan (referenced in Appendix J, no date provided; last two major updates occurred in 2011 and 2017).

- City Critical Facilities and Dam Failure Inundation Areas (in the 2011 and 2017 plans).
- City Critical Facilities and Special Flood Hazard Areas (in the 2011 plan).
- City Critical Facilities and Floodplain (in the 2011 plan).
- City Critical Facilities and Sea Level Rise to Years 2030 and 2060 (in the 2011 plan).

## City GIS Map Analysis & Printing System

- FEMA Flood 2012 and 2015.
- Floodway.
- Watersheds.
- Creeks.

### *Mandatory Goals, Policies, and Objectives for Flooding (required after next revisions of the Housing Element after January 1, 2009)*

The Safety Element, as well as 2011 Environmental Resources Element and 1979 Conservation Element includes the policy framework to avoid the risks of flooding to new development, and the specifics of how development is protected is detailed in the Municipal Code's Flood Plain Management Ordinance (Chapter 22.24). The data about facilities vulnerable to flooding is contained mainly in the City's Hazard Mitigation Plan (HMP)<sup>5</sup> but the mitigation actions listed in the plan are not specifically related to the critical facilities listed as vulnerable to flooding. What seems to be missing are cross references to these various sources and analysis to determine if the policies are internally consistent. Also, not included in the Safety Element, is specific policy direction to:

- Maintain the structural and operational integrity of essential public facilities during flooding; and
- Locate, when feasible, new essential public facilities outside of flood hazard zones, including hospitals and health care facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities or identifying construction methods or other methods to minimize damage if these facilities are located in flood hazard zones.

### *Wildland and Urban Fires Hazards*

Similar to flooding, the Safety Element statutory requirements regarding wildland and urban fire hazards entails collecting a substantial amount of information, particularly upon the next revision of the Housing

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<sup>5</sup> The City's HMP is an annex to the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan, which is valid for five year intervals.

Element on or after January 1, 2014. The Safety Element Technical Appendix includes maps of the City's High Fire Hazard Zones (2012) and Recent Wildfires (as of 2010). The HMP includes a list and map of critical facilities in Fire Hazard Severity Zones. The policy framework for fire hazards seems to meet the statutory requirements but more detail should be provided regarding existing and planned development within high fire hazard zones, as well as a list feasible implementation measures rather than "Possible Implementation Actions to be Considered."

*Additional Requirements (evacuation routes, military installations, peakload water supply and minimum road widths and clearances around structures)*

There is a discussion about evacuation routes and procedures related to wildland fires in the Safety Element and references to the City Fire Department's defensible space (clearances around structures) and road width requirements. Water supply is briefly discussed but there is no discussion about peakload requirements. The focus of these discussions is on fire and not geologic hazards.

*Climate Change Adaptation and Resilience*

There are several completed and in progress documents that meet the requirements of addressing climate adaptation and resiliency strategies, including the HMP, Safety Element, Climate Action Plan (2012), and sea level rise vulnerability assessments. There is, however, no consistent cross referencing and procedures to determine if these documents are internally consistent. Additionally, the more detailed vulnerability assessments and adaption policies completed or in progress have focused on sea level rise and coastal bluff erosion while other safety issues exacerbated by climate change such as wildfires, stream flooding, extreme heat, prolonged drought, and public health are not being addressed with the same focus, even though some of these impacts are happening now. Finally, OPR recommends that if other standalone documents are used to satisfy the requirements of addressing climate adaptation and resiliency strategies, they must be incorporated by reference into the Safety Element and summarized to specifically show how each requirement of §65302(g)(4) is met.

*Other Considerations*

This section addresses incorporation of flood plain management ordinances or other general plan element and periodic review of the Safety Element. The City's flood plain management ordinance and other general plan elements are noted in the Safety Element but not summarized in the sense of specifically showing how each requirement of §65302(g)(5) – (g)(8) is met.

Although not specifically discussed in the OPR Guidelines for Safety Elements, post-disaster rebuilding should be considered in the context of destructive wildfires, which are increasing in size and intensity throughout the state<sup>6</sup>. As of September 2018, a total of 6,390 fires had burned an area of over 1,494,008 acres of California<sup>7</sup>. The Land Use and Safety Elements each have a "possible implementation action" to limit new residential development in the High Fire Hazard Areas by offering incentives and/or an option for property owners to transfer development rights to the high density residential land use designation but the City has not yet analyzed under this or other general plan elements or in the 2004 Wildland Fire Plan (prepared by the Fire Department), if there are certain areas of the City where rebuilding destroyed

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<sup>6</sup> L.A. Times" A new normal for California: Destructive wildfires throughout the state"

<sup>7</sup> The California Department of Forestry and Fire Protection and the National Interagency Fire Center

residential units to existing densities after a wildfire (or other disaster) should be discouraged by facilitating a transfer of development rights to other, less hazardous areas of the City.

### **Recommendation**

The Safety Element is one of the City's most recently updated elements. While it contains all of the statutory requirements, a focused review and update is recommended to resolve issues with the General Plan's multiple sources of information detailed above, as well as to comply with statutory requirements to review and potentially update the Safety Element when other documents are updated.

According to Government Code §65302.6, a city may adopt with its Safety Element the local Hazard Mitigation Plan<sup>8</sup> (HMP) specified in the federal Disaster Mitigation Act of 2000. The City did not include a reference to the HMP (adopted as an annex to the County's Multi-Jurisdictional HMP) in the resolution adopting the Safety Element in December 2013 although the most recent resolution to adopt the City of Santa Barbara Annex of the Santa Barbara County's Multi-Jurisdictional HMP did reference the Safety Element. While concurrent adoption is not required, including a cross reference in the adopting resolutions for each document would strengthen the relationship between them.

A review and update of the Safety Element should be a high priority work program to include the following actions:

- Review, consolidate, and update the multiple sources of flood mapping and policies and cross reference or incorporate by reference other elements and documents as necessary;
- Review and update the discussion about wildland fires given the impacts of climate change and statewide increase in large wildland fires. Encourage the Fire Department to update the Wildland Fire Plan (2004);
- Incorporate other related documents by reference and document how each requirement of the government code is met by these other documents, in particular the HMP should be better incorporated and adopted with the Safety Element;
- Include a discussion about peakload water supply in relation to fire and geological hazards;
- Expand the discussion about climate change adaptation and resiliency to include other climate change indicators such as wildfires, stream flooding, extreme heat, prolonged drought, and public health and include appropriate cross references and summaries of other City documents; and
- Consider an analysis of post-disaster rebuilding in certain areas of the City.

## **Environmental Justice Element**

### **Background**

Legislation adopted in 2016 (Senate Bill 1000) requires cities that have disadvantaged communities to incorporate environmental justice policies into their general plans, either in a separate environmental justice element or by integrating related goals, policies, and objectives throughout the other elements. This update, or revision if the local jurisdiction already has environmental justice goals, policies, and

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<sup>8</sup> At the time the Safety Element was adopted, the City's most recent HMP was adopted on January 25, 2012. The City's HMP and Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan were most recently updated in 2017, but adopted separate from the Safety Element.



objectives, must happen “upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018.”

#### *Definitions of Disadvantaged and Low-Income Communities*

SB 1000 requires specific general plan content if a city has a disadvantaged community:

*“Disadvantaged communities means an area identified by the California Environmental Protection Agency Pursuant to Section 39711 of the Health and Safety Code OR an area that is low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.”*

The statute further defines “low-income area” to mean “an area with household incomes at or below 80 percent of the statewide median income OR with household incomes at or below the threshold designated as low income by the Department of Housing and Community Development’s list of state income limits adopted pursuant to Section 50093”.

The Communities Environmental Health Screening Tool (CalEnviroScreen), ranks census tracts in California based on potential exposure to pollutants, adverse environmental conditions, socioeconomic factors, and prevalence of certain health conditions. According to the SB 535 Disadvantaged Communities map (using CalEnviroScreen 3.0 results, updated June 2018), the County and City of Santa Barbara have no designated disadvantaged communities (most are found in the San Joaquin Valley).

Accordingly, the City, at this time, is not required to address environmental justice in the general plan<sup>9</sup>.

#### *State Funding for Low-Income Communities*

The State Air Resources Board monitors and regulates sources of GHG emissions, including the use of market-based compliance mechanisms (i.e., Cap-and-Trade). All moneys, except for fines and penalties, collected as part of the Cap-and-Trade auction proceeds are deposited into a Greenhouse Gas Reduction Fund. State agencies receiving appropriations offer grants and other funding within three priority areas:

- Sustainable Communities and Clean Transportation;
- Clean Energy and Energy Efficiency; and
- Natural Resources and Waste Diversion.

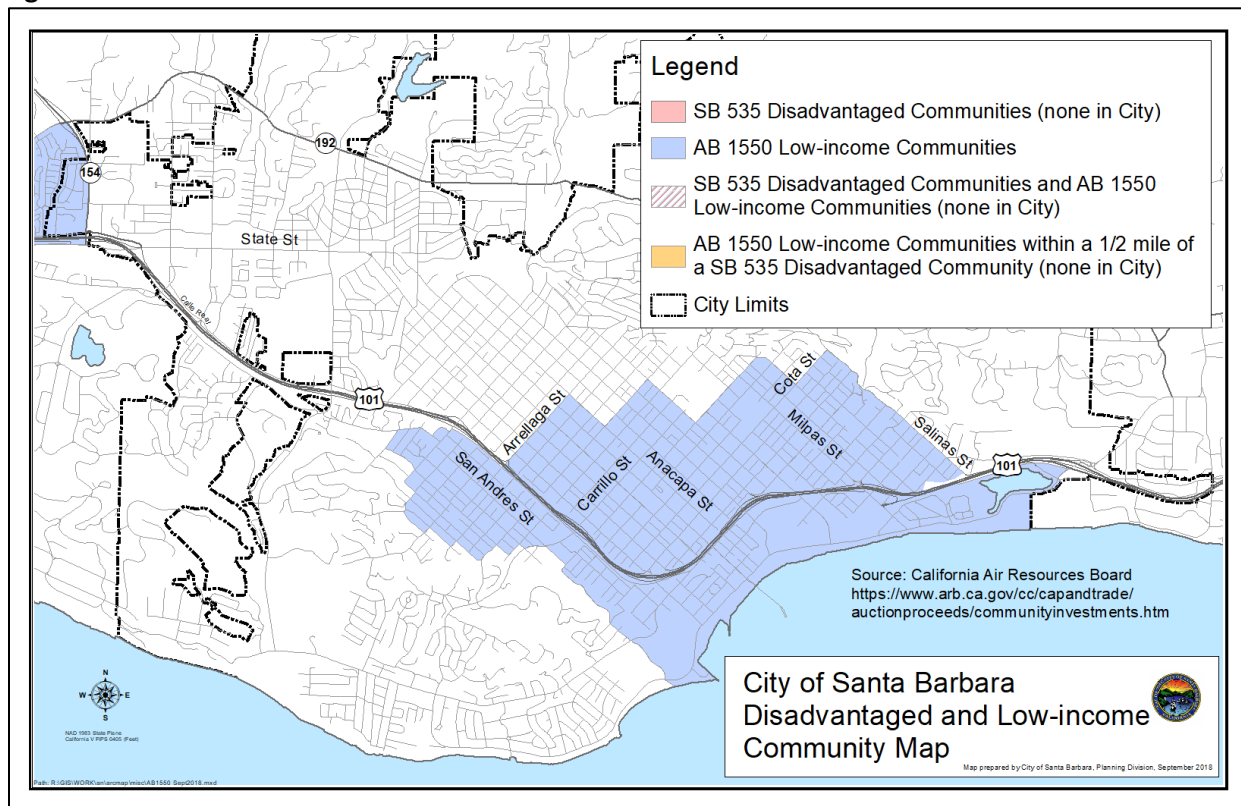
The investment plan for those funds allocates a minimum of 25 percent of available money to projects that provide benefits to disadvantaged communities. Assembly Bill (AB) 1550 of 2016 added a focus on investments in low-income communities and households, defined as census tracts that are either at or below 80 percent of the statewide median income, or at or below the threshold designated as low-income by the California Department of Housing and Community Development’s 2016 State Income Limits. The City of Santa Barbara does have census tracts that qualify as low income, as shown on Figure 1. Based on

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<sup>9</sup> Per Senate Bill 244 of 2011, there are other Land Use and Housing Element update requirements for cities with disadvantaged communities that are located in or near unincorporated island, fringe, or legacy communities; but this requirement does not currently apply to the City of Santa Barbara.

this definition, certain projects in the City may be eligible for various grant and other types of funds through agencies that administer California Climate Investments programs.

**Figure 1: Low-income Communities in Santa Barbara<sup>10</sup>**



**Table 9: Environmental Justice Element Completeness Checklist**

Brief Description of Requirement	Compliance
Identify disadvantaged areas within the area covered by the general plan	N/A
<b>Identify objectives and policies:</b>	
To reduce the unique or compounded health risks in disadvantaged communities	√ (See discussion below)
To promote food access in disadvantaged communities	√ (See discussion below)
To promote public facilities in disadvantaged communities	√ (See discussion below)
To promote safe and sanitary homes in disadvantaged communities	√ (See discussion below)
To promote physical activity in disadvantaged communities	√ (See discussion below)

<sup>10</sup> California Air Resources Board. <https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/communityinvestments.htm>

To promote civil engagement in the public decision-making process	√ (See discussion below)
That prioritize improvements and programs that address the needs of disadvantaged communities	√ (See discussion below)

### **Discussion**

As stated above, the City of Santa Barbara does not have any designated disadvantaged communities in its jurisdiction, yet based on a review of OPR’s Completeness Checklist, the General Plan does contain many policies to reduce pollution; promote public facilities; promote food access; promote safe and sanitary homes; promote physical activity; promote civic engagement; and prioritize improvements and programs that address the needs of low-income communities.

#### *Reduction of Pollution*

The 2011 Environmental Resources Element contains climate change policies that also minimize air and water pollution in the City of Santa Barbara. The policies include the reduction of GHGs via development of a comprehensive climate action plan and requiring new development to demonstrate how a project will support attaining regional GHG vehicular emission reduction targets (not yet implemented). This element also has energy conservation policies that reduce the City’s dependency on energy derived from fossil fuels and encourages all new construction to be designed with the goal of achieving “carbon neutrality” by 2030, further reducing air pollution. The air quality policies of the Environmental Resources Element also speak to establishing incentives like parking priorities and plug-ins for electric vehicles. It also has policies to support regional and State efforts to reduce marine shipping emissions and air quality mitigation measures for new development and construction projects.

Additionally, the 1979 Conservation Element, the 2011 Land Use Element and the 2011/1997 Circulation Element all contain policies and strategies to reduce single-occupant automobile trips by increasing transit use, bicycle ridership, walking, and carpooling.

Updates to the Land Use Element in 2011 further strengthen the above policies by encouraging a mix of uses to promote mobile and active living and discourage single-occupant automobile trips.

#### *Promotion of Public Facilities*

The 2015 Housing Element contains a policy to increase City public facilities by acquiring underutilized National Guard and Army Reserve sites in the City. The 2011 Open Space, Parks and Recreation Element contains policies to provide ample public facilities and open space through a variety of types, including nature reserves, parks, beaches, sports fields, trails, urban walkways, plazas, paseos, pocket parks, play areas, gardens, and viewpoints. The creation and maintenance of these various facilities will encourage the use of these public facilities in the community. The 2011 Land Use Element also provides policies for the encouragement of multigenerational facilities and services, including community facilities to support seniors and children.

#### *Promotion of Food Access*

The 2011 Environmental Resources Element contains policies that promote food access across the community through farmers markets, community gardens and education, school gardens and education,

food scrap recovery and composting programs, and incentives supporting regional local sustainable food sources available to local schools, cafeterias, grocery, convenience stores, and restaurants. The 2011 Land Use Element also calls out specific policies to conduct an audit to determine if the City owns land that could be used for community gardens and encourage the voluntary private development of gardens.

#### *Promotion of Safe and Sanitary Homes*

The 2011 Environmental Resources Element contain policies related to setback from Highway 101 for all new residential development and sensitive receptors to encourage quiet, high quality neighborhoods and an implementation action to establish a financial incentive program to provide low-interest loans to allow environmental justice populations<sup>11</sup> located in high noise areas to construct noise control improvements. The Housing Element also includes policies for the formation of rehabilitation programs for existing housing stock and the identification of substandard housing that may need to be demolished.

#### *Promotion of Physical Activity*

The 2011 Open Space, Parks and Recreation Element contains policies to provide ample open space through a variety of types, including nature reserves, parks, beaches, sports fields, trails, urban walkways, plazas, paseos, pocket parks, play areas, gardens, and view-points. These various facilities will encourage physical activities in the community. It also has policies regarding the acquisition and maintenance of these facilities. In addition, the 2011 Circulation Element calls out many specific policies related to pedestrian and bicycle infrastructure enhancements, which would further promote physical activity.

#### *Promote Civic Engagement*

The 2015 Housing Element includes provisions to provide a bilingual ombudsperson for tenants in substandard units who wish to report complaints. The 1997 Circulation Element also contains policies to reach out to schools to expand education programs about the benefits and advantages of using transit. It also speaks to working with neighborhoods, interest groups, employers, the County, UCSB, and SBCAG on developing the Bicycle Master Plan, which was completed in 2016.

#### *Prioritize improvements and programs that address the needs of disadvantaged communities*

The 2015 Housing Element provides policies that promote equal housing opportunities for all segments of the community, with special emphasis given to extremely low, very low, low, moderate, middle income, and special needs households. The production of affordable housing units is of the highest priorities and the City encourages all opportunities to construct new housing units that are affordable to owners and renters and it also speaks to encouraging public knowledge and support for affordable housing through reports to City Council, advertisements, and other City programs. It also calls out supporting programs and efforts designed to prevent homelessness and support of other agencies in their efforts to shelter the homeless population. The Housing Element also identifies policies to increase housing for transitional individuals, seniors, and persons with disabilities. In addition, it speaks to the preservation of affordable housing in the City for extremely low, very low, low, moderate, and middle income populations. It also

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<sup>11</sup> The Environmental Resources Element does not define “environmental justice populations” so it is assumed these policies were meant to address low-income areas rather than disadvantaged communities (not applicable in Santa Barbara).

calls out policies to cooperate regionally on legislative issues that would expand housing for disabled populations.

The 2013 Safety Element contains policies regarding community resiliency that include addressing the safety of people with special needs or disabilities. The 2011 Land Use Element also provides policies for the encouragement of multigenerational facilities and services, these include community facilities to support seniors and children.

### **Recommendation**

The City's existing General Plan Elements cover many parts of Environmental Justice with a few major exceptions that could be expanded on in the future including the promotion of public facilities, promotion of physical activity, and promotion of civic engagement. For the next update to the Open Space, Parks and Recreation Element, which is not programmed at this time, it is recommended to include these policies to further promote public facilities:

- Consider environmental justice issues as they are related to the equitable provision of desirable public amenities such as parks, recreational facilities, community gardens, and other beneficial uses that improve the quality of life; and
- Encourage the development and maintenance of recreational facilities by the private and non-profit sectors that complement and supplement the public recreational system.

For the next update to the Land Use Element, which is not programmed at this time, it is recommended to include a policy section on Environmental Justice and Public Involvement and include these policies to further promote of civic engagement:

- Hold meetings and workshops at times and locations that are convenient for community members to attend, especially those that may be directly affected by a particular decision;
- Utilize diverse media, technology, and communication methods to convey information to the public;
- Expand efforts to reach out to and provide meaningful involvement opportunities for low-income, minority, disabled, children and youth, and other traditionally underrepresented citizens in the public participation process and encourage non-traditional communication methods to convey complex ideas in an easily understandable manner;
- Provide adequate translation or interpretation services for documents and public meetings, as resources allow; and
- Educate decision makers and the public on the principles of environmental justice.

## **OTHER GENERAL PLAN POLICY CONSIDERATIONS FROM OPR'S GUIDANCE DOCUMENT**

There is no mandatory structure or maximum number of elements that a general plan must include. As discussed above, there are mandatory elements, but the City has the discretion to organize its general

plan as suitable for the community. The sections under this heading are policy concepts that OPR recommends be incorporated into other required stand-alone elements or as their own elements.

## Air Quality

While air pollution is a regional issue, local governments can support local air district's efforts to achieve and maintain compliance with state and federal air quality standards by addressing air quality issues through general plans, ordinances, transportation services, and other plans and programs. The City originally addressed air quality within the 1979 Conservation Element with a goal of maintaining air quality above federal and state ambient air quality standards and reducing dependence upon the automobile. Additional air quality policies were adopted with the 2011 Environmental Resources Element in response to Class II potential air quality impacts from an increased number of residents near the freeway and commercial/industrial areas.

Cities and counties within the San Joaquin Valley Air Pollution Control District are the only entities required by state law to include air quality measures in their general plans. OPR's Guidance recommends that if a separate air quality element is adopted, or air quality beneficial policies are incorporated into the general plan, then consistency among elements and policies within the general plan is essential for successful implementation. The City's air quality policies in the Conservation Element and Environmental Resources Element appear to be generally consistent with the General Plan, but there may be some inconsistencies with the Coastal LUP.

### Recommendation

- When the Environmental Resources Element is updated, or if the General Plan is amended for consistency with the Coastal LUP, the "Possible Implementation Actions to be Considered" action ER7.2 Barriers and Sound Walls, which promotes their use to reduce particulate emissions, should be reviewed for consistency with the Coastal LUP, which has a policy to minimize sound barriers to protect visual resources.

## Equitable & Resilient Communities

### Background

This section of OPR's Guidance is concerned with social equity as vital for the economy, the health of the population, community well-being, and climate policies that support all residents. This section of OPR's guidance is closely tied to the Environmental Justice Element, as environmental justice is considered an equity issue. According to OPR, there is not one way to incorporate equity into a general plan, but there are unifying approaches to integration, including using an equity framework as the basis for starting its planning process.

The 2011 General Plan's Sustainability Principles elaborate on the basic components of sustainability, described as Economy, Environment, and Equity. The Equity portion of the General Plan is elaborated further as follows:

*Socio-economic diversity is important for maintaining a healthy culture and stable economy, and should be supported through: housing affordable to all income levels and mobility options for a*

*range of income levels; economic policy to encourage livable wages and good jobs; and opportunities for all to participate in education, cultural events, and the arts.*

The Housing Element's policies strongly support affordable housing and the Circulation Element promotes the full array of mobility options. In 2011, the City adopted a new Economy and Fiscal Health Element in the General Plan, which includes policies that promote economic resiliency and equity and support green businesses, local small businesses, and employment for local residents.

*A healthy community requires investment in public infrastructure, facilities and services that provide equal access to open space and recreation, clean air, healthy food, housing and neighborhood-serving commercial uses. The plan for the entire community should provide for all life phases, the design of the built environment needs to be responsive to the needs of all, including youth, seniors, and people with disabilities.*

The Environmental Justice section describes how the General Plan responds to these issues.

*All members of the community should be provided with information about and strongly encouraged to participate in community decisions that affect them.*

The 2011 General Plan's public participation goal is to provide a public participation process that is inclusive, responsive, and balanced with regard to the broad needs of the community.

*"Living with our Resources" includes supporting, maintaining, and enhancing our human resource, such as our workforce, in particular workers need to keep the city functioning for normal day to day living, or in the event of disaster.*

As detailed in the Safety Element, City functioning has been tested in the past by earthquake, wildfire, and landslide disasters. Most recently the City was greatly impacted by the 2017 Thomas Fire and 2018 Montecito Debris Flow disasters, which cloaked the City with smoke and ash and caused closures of local and regional roads, stopped train service for a time, and more importantly, a 12-day closure of Highway 101 to the south.

The Thomas Fire started on December 4, 2017, and at its largest, encompassed 281,893 acres, destroyed more than 1,063 structure, and burned from Santa Paula to Santa Barbara<sup>12</sup>. In the counties of Ventura and Santa Barbara over 88,000 residents were evacuated, with an additional 30,000 in Santa Barbara County told to be ready to leave, including many City residents<sup>13</sup>. The size and uncertainty of the fire caused the workforce of the City who live outside the City in Summerland, Carpinteria, and Ventura to stay home due to the uncertainty of a pending evacuation order.

On January 9, 2018, an estimated 0.5 inches of rain fell within a five-minute period during the debris flow, causing mud and boulders from the Santa Ynez Mountains to flow down creeks and valleys into

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<sup>12</sup> Cal Fire. [http://cdfdata.fire.ca.gov/incidents/incidents\\_details\\_info?incident\\_id=1922](http://cdfdata.fire.ca.gov/incidents/incidents_details_info?incident_id=1922)

<sup>13</sup> Los Angeles Times. <http://www.latimes.com/local/lanow/la-me-thomas-fire-santa-barbara-fire-20171210-story.html>

Montecito. The debris flows were up to 15 feet in height of mud, boulders and tree branches, moving at estimated speeds of up to 20 miles per hour into the lower areas of Montecito.

According to a news source, not since the 6.8 earthquake that hit Santa Barbara in 1925, has the community faced such a sudden, abrupt disruptive event. The Santa Barbara Region Chamber of Commerce estimated that, depending on the business, 20% of the workforce could not get to work for that period. Businesses in the affected area are estimated to have lost \$10 million in sales in December, and another \$5 million in January, reducing sales tax collections throughout the County. As a result, the City of Santa Barbara estimates that it lost \$1.5 million in sales and occupancy taxes due to the disasters<sup>14</sup>.

As detailed in previous General Plan Implementation and AMP Reports, in 2015, only 34% of workers employed in the City also live in the City. The City has recognized the Jobs/Housing Imbalance for many years and a large portion of the 2011 General Plan Update was focused on continuing to limit non-residential growth and better incentivizing new residential development. Even with existing policies, the high cost of rental and ownership housing and overall desirability of living in Santa Barbara will continue to drive a Jobs/Housing Imbalance in the community. Therefore, as part of emergency preparedness and resiliency planning, taking into account more extreme disasters resulting from climate change, it should be assumed that a segment of the workers needed to keep the City functioning during a disaster will not be living in the City or on the South Coast.

After the Montecito Debris Flow, several commuter options were made available, particularly once the train tracks were clear of debris. Amtrak added extra service but the trains were extremely crowded and often delayed; ferry service providers started operating shuttles between Santa Barbara Harbor and Ventura Harbor, also very popular and often sold out; more than 400 “critical workers” (i.e., firefighters, police officers, medical workers, law enforcement, K-12 educators, and others) were placed on a fleet of 17 buses that were allowed to be escorted through Montecito<sup>15</sup>; or people drove around the closure using Highway 5 and 166, detours that takes up to two hours longer one way than the normal commute.

### **Recommendation**

The City of Santa Barbara is uniquely situated between the mountains and the ocean with only three major ingress and egress points east, west, and north of the City proper. When the community is faced with a major disaster that closes these transportation corridors, coordinated efforts and community resourcefulness make it possible for most of the critical workforce to continue maintaining City and community functions. Nonetheless, in the recent prolonged closure of Highway 101, commuters living in Summerland were effectively stranded because there was no access to the train stations, harbors, or even a way to drive around the closure. As part of climate adaptation and/or emergency evacuation planning, additional plans should be developed to support stranded workforce commuters if major travel corridors are inoperable for a significant period of time or if other options are not available.

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<sup>14</sup>Noozhawk,  
[https://www.noozhawk.com/article/business\\_leaders\\_outline\\_scope\\_of\\_impact\\_from\\_fire\\_smoke\\_ash\\_and\\_mudslides](https://www.noozhawk.com/article/business_leaders_outline_scope_of_impact_from_fire_smoke_ash_and_mudslides)

<sup>15</sup>Noozhawk,  
[https://www.noozhawk.com/article/critical\\_personnel\\_take\\_bus\\_shuttles\\_around\\_montecito\\_highway\\_101\\_closure](https://www.noozhawk.com/article/critical_personnel_take_bus_shuttles_around_montecito_highway_101_closure)



OPR's Guidance on this topic makes a point that, as policy priorities for equitable and resilient communities are established, formulating strong policy language is a key first step. For example, rather than "consider implementing", use the word "implement". It is recommended to continue to amend the General Plan to eliminate the confusing terminology "Possible Implementation Actions to be Considered."

## Healthy Communities

### Background

OPR's healthy communities chapter provides concepts that communities may voluntarily incorporate into their general plans and focuses on data analysis and policy development to further healthy planning. OPR acknowledges that many opportunities are already aligned with existing planning practices and state legislation, such as requirements for incorporated complete streets, addressing climate change, and considering environmental justice. This chapter of OPR's Guidance provides ideas for data analysis, policy development, and implementation.

While local jurisdictions can prepare a separate health element, the City's General Plan has health considerations woven throughout all elements. The previous discussion on Environmental Justice indicates how the General Plan addresses environmental health, food access, access to safe and sanitary homes, and access to physical activity. Therefore, this section will review OPR's recommendations on a changing climate and resiliency and recommended data for consideration in analysis of this element.

### Recommendation

When updating the other elements of the General Plan that have health implications, edit the language to further tie the policy to the health of the community and the positive effect the policy will have on community health. For example, in the Circulation Element when the Goal is to "Increase Walking and Other Paths of Travel" add text that increased pedestrian activity has been proven to lower health risks associated with obesity and chronic disease.

## Climate Change and Resiliency

### Background

Climate change can have devastating consequences on health due to physical or mental harm or displacement from property losses and increased frequency or severity of disasters like flooding, drought, fire, and landslides. While climate change will be one of the biggest threats to public health for decades to come, land use planning can help communities prepare, adapt, and reduce GHGs that cause climate change.

Some health effects of climate change are already occurring due to increasing temperatures. Temperatures in urban areas can exacerbate already warm conditions due to materials, such as asphalt, absorbing heat and then releasing it, causing urban heat islands. According to OPR, land use planning to reduce urban heat island effects is essential to creating more resilient communities. While the 2011 Environmental Resources Element and CAP both have an Urban Heat Island Effect action, it has not yet been implemented. Other strategies to reduce urban heat islands include increasing tree and vegetative cover but public tree planting has been greatly curtailed due to the prolonged drought.

OPR further recommends land use policies to promote efficient circulation, conservation, and recapture of water as necessary for water conservation and drought mitigation; prevent large-scale stagnant pools to combat the health risks of vector borne disease; avoid development on prime agricultural lands; incorporate energy efficiency measures to reduce energy bills and allow families to use savings towards other expenses; and policies to improve air quality for public health. The City's General Plan and other sources such as the building code include policies or provisions for most of these issues.

### **Recommendation**

Prioritize implementation of CAP Strategy 42 and conduct research on other methods to reduce the urban heat island effect. The Parks, Open Space, and Recreation Element should include additional policies to maintain existing City trees in parks and parkways throughout periods of drought.

Of the data sets OPR recommends for an analysis of healthy communities, the following could be useful to analyze in future general plan element updates:

- Walk trips per capita (baseline to inform active transportation and climate change and resiliency policies);
- Percent of commuters who use active transportation (inform priorities around active transportation, mixed use developments, job locations, and housing locations);
- Location of retail food outlets, community gardens, and farmers markets (baseline to identify areas that might not have adequate access);
- Uninsured population data (identify vulnerable populations);
- Extreme heat days (monitoring can inform policies around transit, greening, materials, and programs to mitigate its effects);
- Urban tree canopy (establishing a baseline can inform policy for transit, roadway, recreation, and bike and pedestrian planning);
- Location of health facilities (establishing a baseline can help improve transit decisions, siting, and emergency preparedness planning);
- Location of schools and child care facilities (inform policies to leverage joint use agreements, ensure they are accessible, and free from environmental health hazards); and
- Vehicle miles traveled per capita (how much people drive is a proxy to understand how active community members are).

## **Economic Development and the General Plan**

### **Background**

Cities may include a distinct economic development element or highlight economic development as a primary theme or goal throughout their general plan. Most communities, including Santa Barbara, set forth goals of economic health and sustainable funding for public services for current and future residents, as part of support for a thriving business environment, job growth and retention, and, as appropriate, community revitalization. The 2011 General Plan includes a new Economy and Fiscal Health Element that covers both local and regional economic considerations and offers policies that promote economic resiliency and equity as well as support for green businesses, local small businesses, and employment for local residents.

As highlighted in OPR's Guidance, the impacts of climate change present an increasing threat to local economies throughout California. The Thomas Fire, the scale of which was identified by Governor Brown as an indicator of climate change, and subsequent Montecito Debris Flow, had a devastating impact on the local economy. While sea level rise has not yet impacted the City, it is anticipated to cause temporary disruptions to visitor-serving businesses and other local economic drivers by 2060, and potentially permanent disruptions by 2100. By implementing policies to promote adaptation and resiliency, the City can help reduce the likelihood of economic disruption from natural disasters and extreme weather events.

Finally, it is important to engage business community members in any economic development plan, as their input and support is vital to its success. Direct outreach and working with business organizations, and partnering with Santa Barbara City College and University of California Santa Barbara can help create a robust pool of information from community members invested in economic development.

The goals, policies, and implementation actions of the Economy and Fiscal Health Element generally foster economic health of the community and the City's recent ACCELERATE program is one example of implementation.

### **Recommendation**

Either through an update of this element or when other related elements are updated:

- Incorporate the impacts of climate change into economy and fiscal health policies;
- Link this section to the Circulation Element and ensure multimodal circulation infrastructure is promoted around retail centers, such as bikeshare stations, pedestrian rest areas, shaded transit stops;
- Coordinate economic policies with the Housing Element as an efficient economy relies on housing options that are affordable to a range of workers and accessible to jobs; and
- Ensure equity is considered in all economic development decisions, to ensure all community members benefit from policies and investments.

## **Climate Change**

### **Background**

The impacts of climate change pose an immediate and growing threat to California's economy, environment, and to public health. While climate change is global, the effects and responses occur locally and cities and counties that have the obligation to reduce GHG emissions and to incorporate resilience and adaptation strategies into planning. OPR's Guidance on this topic includes detailed recommendations for addressing climate change at the local level. The City's Climate Action Plan and GHG emissions inventory were discussed at length in the 2017 GP/AMP. Updating the CAP remains a high priority.

### **Recommendation**

- Initiate a comprehensive update to the CAP, coordinated with local and regional entities such as Community Environmental Council, Santa Barbara County, and Central Coast Climate Collaborative; and
- Prepare a related Climate Adaptation and Resilience Plan, incorporate the outcomes of the Sea Level Rise Adaptation Plan (in progress) and include other climate change indicators such as wildfire, drought, flooding, and temperature extremes.

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# Growth Management

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## GENERAL PLAN VISION

The General Plan includes the following direction in its “Vision of a Sustainable Santa Barbara:”

- Manage growth within our limited resources to retain the desirable aspects of the physical city without sacrificing its economic vibrancy and demographic diversity; and
- Allow as much housing as possible within resource limits to provide an array of lifestyle options for a demographically and economically diverse resident population.

## BACKGROUND

### The Jobs/Housing Imbalance

For decades, the demand for housing in Santa Barbara has exceeded the housing supply, causing home prices to continually rise and become unaffordable to a progressively larger portion of the local workforce. This phenomena is known as the “Jobs/Housing Imbalance,” and refers to the imbalance between the number and type of jobs available, and the volume and type of housing affordable to the local workforce.

According to the 2011 General Plan Certified FPEIR, maintaining a rough balance between jobs and housing in a region can address key sustainability, environmental, and resiliency issues, including limiting long-distance commuting and regional traffic congestion, energy consumption, air pollution, and the associated generation of greenhouse gases which contribute to global climate change. Additionally, when workers live in the same community that they work in, they are more likely to be involved in the community, to be available to provide critical services and respond to emergencies, and to spend money in the local economy.

The Jobs/Housing Imbalance is a regional issue, and the South Coast portion of Santa Barbara County<sup>16</sup>, is considered one housing market. On the South Coast, the scales are tipped such that there is an oversupply of jobs and undersupply of housing, resulting in long distance commuting.

The 2011 General Plan Certified FPEIR projected that non-residential development would be a major contributor to future job creation, and without an increase in the supply of workforce housing, the Jobs/Housing Imbalance would increase. As a result, the 2011 General Plan aims to improve the Jobs/Housing Imbalance by increasing the supply of affordable housing near jobs and limiting non-residential growth. This section provides a status update of the location, quantity, and type of recent development in the City to determine how successful the plan has been in improving the Jobs/Housing Imbalance and achieving the 2011 General Plan Vision.

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<sup>16</sup> The area of the County that extends west from the City of Carpinteria, past the City of Goleta, to the unincorporated Gaviota Coast.

## Status of the Jobs/Housing Balance

### *Total Number of Jobs Per Housing Unit<sup>17</sup>*

The Jobs/Housing balance is typically evaluated using the ratio of total jobs to total housing units. While this approach does not indicate whether the local workforce is living in the local housing, it does provide a simple, repeatable indicator that can be tracked over time. The 2011 General Plan Certified FPEIR estimated that the Jobs/Housing balance for the South Coast was 1.42 jobs per housing unit, with the City's jobs/housing balance at a similar rate of 1.43 jobs per housing unit (based on 2008 population and June 2009 jobs). The 2011 General Plan Certified FPEIR estimated that the buildout of the General Plan would result in a slight improvement to the jobs/housing balance in the City. In 2017, it was estimated that the jobs/housing balance in the City was 1.28 jobs per housing unit. This change is largely due to a 8% decrease in the number of jobs since 2009.

On face value, it appears that the jobs/housing balance has improved. However, it is important to note that there are inherent limitations in the methodology used to produce these jobs/housing ratios. Specifically, it is assumed that estimated local employment is equal to the local number of jobs, which is an under-representation of the amount of local jobs. This is because employment is a measurement of the local jobs held by local workers, so unfilled jobs and jobs held by commuters are not included in employment figures. As a result, a decrease in local employment may not be reflective of a decrease in the number of local jobs and instead may reflect an increase in jobs held by commuters. In addition, the employment values reported are periodically adjusted to new baselines and with updated census information, making annual values not directly comparable to one another, as is the case between the 2017 and all previous values. Therefore, the changes reported may be due to changes in the methodology of the underlying job estimates rather than changes in the actual number of local jobs over time. That being said, this information is provided to maintain consistency with the assumptions made and analysis done in the 2011 General Plan Certified FPEIR.

### *Where Workers Live<sup>18</sup>*

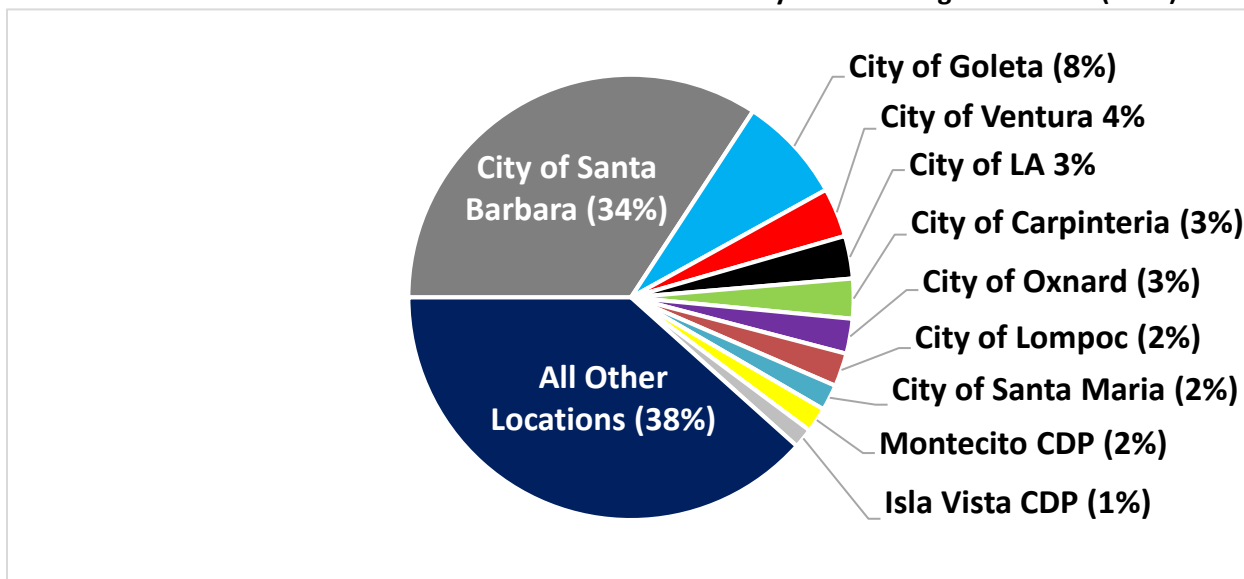
Another way to measure the Jobs/Housing balance is by tracking where workers live, as a high percentage of workers who both live and work in a specific location indicates a balance between the jobs and housing stock in that area. In 2015, only 34% of workers employed in the City also lived in the City, which is reflective of the roughly 35,500 workers who commute into the City each day. While this value is nearly unchanged from the 2011 General Plan Certified FPEIR 2008 baseline, it is 14% lower than in 2002 (the oldest and highest value in this dataset). This low percentage indicates that the majority of the City's housing stock is not operating as workforce housing and that the jobs/housing imbalance has become worse over time, with no improvement from the 2008 baseline. A breakdown of where workers in Santa Barbara lived in 2015 is found in Chart 1.

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<sup>17</sup> Sources: California Department of Finance Housing and Population Estimates and State of California Employment Development Department (EDD) Labor Market Information (LMI).

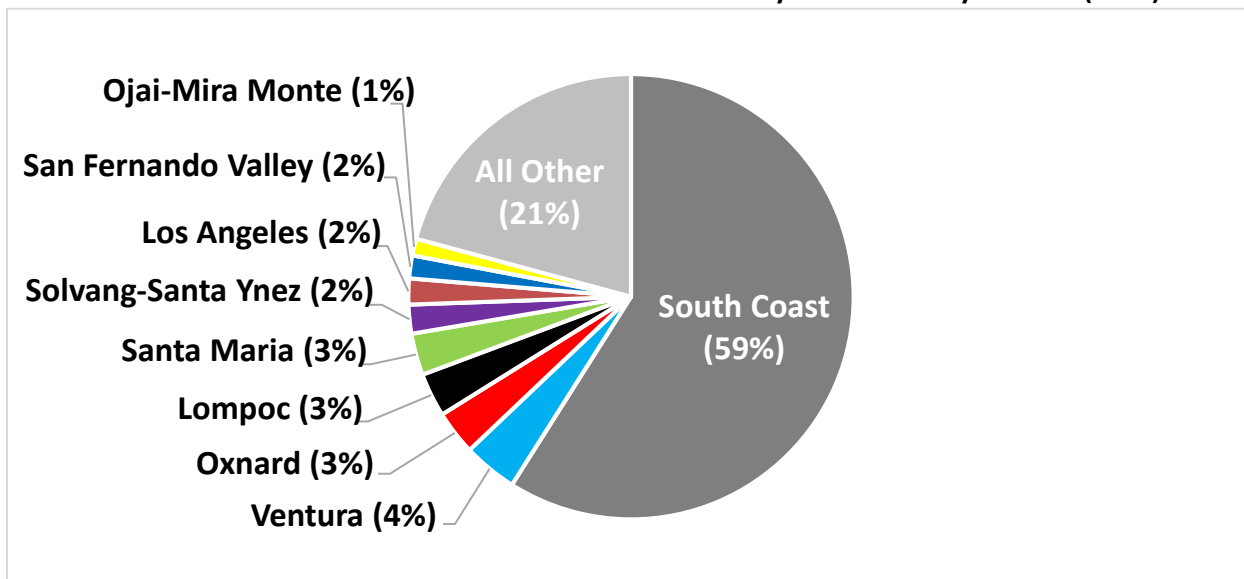
<sup>18</sup> Source: United States Census Longitudinal Employer-Household Dynamics (LEHD) OnTheMap.

**Chart 1: Where Workers Live Who Work in Santa Barbara by Census Designated Place (2015)**



However, as previously mentioned, the jobs/housing balance is a regional issue, and the South Coast is considered one housing market. With this in mind, as shown in Chart 2, a significantly higher percentage (59%) of workers employed in the City live in the local housing market (the South Coast) than specifically live in the City (34%) portion of the local housing market. Consistent with the City-specific trends provided above, the 2015 value is unchanged from the 2008 baseline and 15% lower than in 2002 (the oldest and highest value in this dataset).

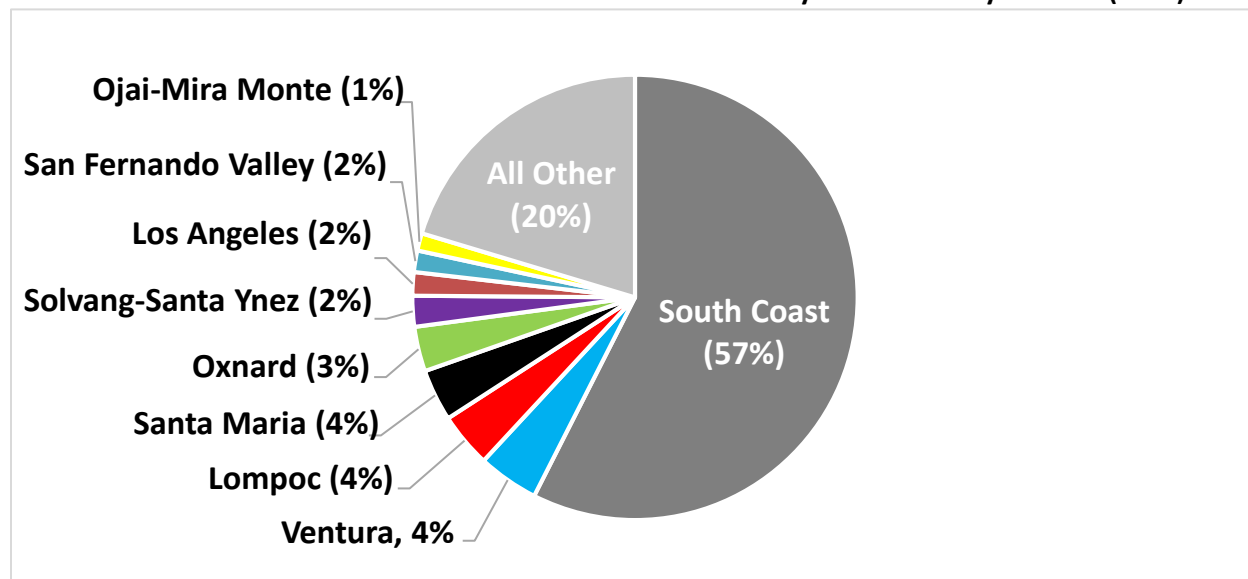
**Chart 2: Where Workers Live Who Work in Santa Barbara by Census County Division (2015)**



When compared to the entire South Coast, the distribution of where workers live who work in Santa Barbara is consistent to trends across the South Coast. Furthermore, in 2015, 57% of workers employed in the South Coast also lived in the South Coast, which is 2% lower than in 2008, and 15% lower than in 2002 (the oldest and highest record in this dataset). This indicates that the worsening of the Jobs/Housing

imbalance in the City has generally matched trends on the South Coast. A breakdown of where workers in the South Coast lived in 2015 is found in Chart 3.

**Chart 3: Where Workers Live Who Work in the South Coast by Census County Division (2015)**



## NONRESIDENTIAL DEVELOPMENT

### General Plan Policy Direction

#### The Nonresidential Growth Management Program

The 2011 General Plan (Policy LG2 Limit Non-Residential Growth) directed that new nonresidential square footage limitations be established for the following nonresidential development categories through 2033: Community Benefit (600,000 sq. ft. limit); Small Addition (400,000 square feet limit); and, Vacant Property (350,000 square feet limit). Consistent with the 2011 General Plan Vision, a Nonresidential Growth Management Program (GMP)<sup>19</sup> was adopted that aims to balance residential and nonresidential growth, while providing for economic and community needs, by including those nonresidential development limits and encouraging nonresidential development in areas that most efficiently use resources.

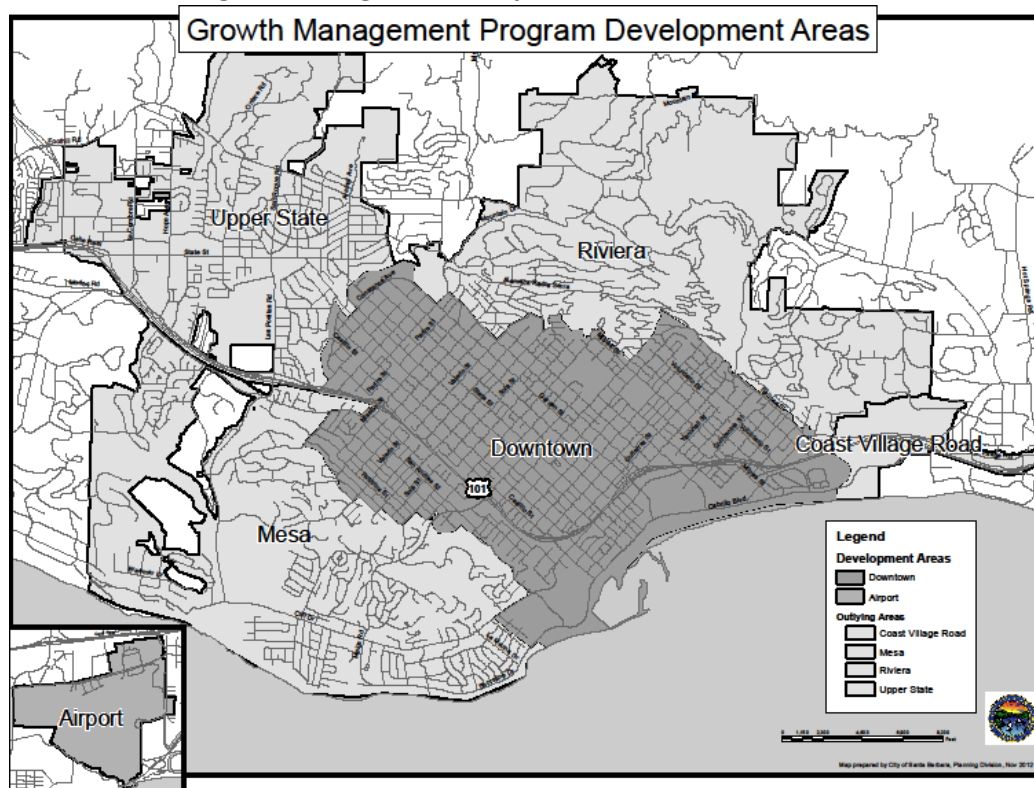
Furthermore, the GMP aims to efficiently use existing transportation capacity and reserve constrained transportation capacity for high priority development. It does so by dividing the City into six Development Areas (shown on the map below) and encouraging development in the Downtown Development Area because the 2011 General Plan Certified FPEIR determined that land developed within this area will generate the least amount of traffic per square footage of development given the mix of land uses, the grid street system, and the availability of a variety of transportation modes including biking, walking, and

<sup>19</sup> The GMP Ordinance became effective on April 11, 2013.



transit. Additionally, the Downtown Development Area was determined to best respond to efforts to offset traffic impacts generated from additional nonresidential development.

**Figure 2: Growth Management Program Development Areas**



One of the ways the GMP encourages development in the Downtown Development Area is by limiting where development rights can be transferred; Development rights can only be transferred within a Development Area or to the Downtown Development Area. This allows flexibility for minor improvements and additions in the outlying areas, encourages infill and redevelopment, and incentivizes development in the Downtown Development Area. The GMP also incentivizes development in the Downtown Development Area by requiring all nonresidential development outside of the Downtown Development Area proposing over 1,000 square feet of additional floor area to fully mitigate all traffic impacts or to reduce the addition below 1,000 square feet. To date, no development projects have been denied because of a project-specific traffic impact. However, many have been reduced or redesigned to avoid traffic impacts after consultation with staff.

Because the GMP is a key implementation of the 2011 General Plan, and is the primary tool used to manage the location, quantity, and type of development in the City, the following nonresidential development information is described in the context of the GMP framework, using the GMP effective date as the baseline, rather than the 2011 General Plan effective date.

## Development Terminology

There are two primary terms that describe the status of a development project: 1) Completed construction, and 2) In the pipeline. Taken together, these categories comprise overall development

activity and are included throughout this section to provide information on development in the City. A description of these categories is found below:

### **Completed Construction**

A development project is considered “built and occupied” when it has completed construction and City staff has issued a Certificate of Occupancy.

### **The Development Pipeline**

Development projects that are in the planning or building permit process are considered “in the pipeline.” For applications submitted to the planning process, projects are considered “pending” until the necessary land use and/or design review approvals are issued, at which point a project is deemed “approved.” Once a building permit is issued, the project is considered “building permit issued.” For a variety of reasons, not all projects in the pipeline complete the planning or building permit process and are built and occupied. However, these projects provide an indication of what future completed construction will likely be.

### **Completed Nonresidential Development**

Since the GMP became effective in 2013 through August 2018, there has been 303,425 square feet of additional completed nonresidential development in the City, which if averaged annually, represents an additional 56,275 square feet of nonresidential development per year. As shown in Table 10, the vast majority (81%) of this development has occurred in the Downtown (46%) and Airport (36%) GMP development areas. Notable projects include:

#### *Downtown Development Area*

- Granada Theatre (13,360 square feet constructed, 2013).
- The Wayfarer Hostel (11,091 square feet constructed, 2014).
- Santa Barbara Zoo Expansion (9,190 square feet constructed, 2014).
- MOXI – Museum of Exploration + Innovation (16,691 square feet constructed, 2017).
- 203 Chapala residential project (11,211 square feet demolished, 2017).
- Sansum Clinic Outpatient Cancer Treatment Facility (35,845 square feet constructed, 2018).
- Hotel California (16,508 square feet constructed, 2018).

#### *Upper State Development Area*

- Sansum Clinic Foothill Triangle project (58,372 square feet constructed, 2015).
- The Marc AUD residential project (27,240 square feet demolished, 2017).

#### *Mesa Development Area*

- 1919 Cliff Drive restaurant expansion (864 square feet constructed, 2014).

#### *Riviera Development Area*

- The El Encanto Hotel (13,021 square feet constructed, 2014).

#### *Coast Village Development Area*

- 1255 Coast Village Road Mixed Use (5,673 square feet constructed, 2015).

#### *Airport Development Area*

- Former Dodge auto dealership (18,221 square feet demolished, 2013).
- 150 David Love Place Airport Building (22,448 square feet demolished, 2013).
- Direct Relief Building (148,920 square feet constructed, 2018).

**Table 10: Constructed Nonresidential Development (square feet) from GMP Effective Date (April 11, 2013) to August 31, 2018\* by GMP Development Area**

Year	Downtown	Upper State	Mesa	Riviera	Coast Village	Airport	All Areas
<b>2013**</b>	19,313	112	0	0	0	-40,669	-21,244
<b>2014</b>	35,926	58,372	864	13,021	0	0	108,183
<b>2015</b>	-3,169	917	0	438	5,686	0	3,872
<b>2016</b>	4,948	0	0	0	260	0	5,208
<b>2017</b>	17,677	-24,251	0	0	962	0	-5,612
<b>2018***</b>	64,098	0	0	0	0	148,920	213,018
<b>Total</b>	138,793	35,150	864	13,459	6,908	108,251	303,425

\*This table reflects the square footage of completed projects per year. Some of the included projects were approved prior to the GMP effective date.

\*\*Includes only projects that were completed after the April 11, 2013 GMP effective date.

\*\*\*Includes only projects that were completed on or before August 31, 2018.

As previously described, the GMP limits the square footage of specific nonresidential development categories. However, as shown in Table 11, if current trends continue, these limits may have a minimal impact on nonresidential development, given the relatively small amount of development that has occurred since the GMP became effective. For instance, with 26% of the GMP 20 year timeline completed, only 14% of allotted Small Addition square footage and 11% of Vacant Property square footage has been used. And, the allotted Small Addition square footage in 2018 is comprised of only three new projects<sup>20</sup>, while the allotted Vacant Property square footage is due to changes in the size of existing projects that were allocated Vacant Property square footage in previous years.

There has, however, been a larger allotment of Community Benefit square footage, which has mirrored the program timeline, with 26% of allotted Community Benefit square footage used and 26% of the GMP 20 year timeline completed. This is primarily due to one large development – the Direct Relief project at 6100 Wallace Becknell Drive, allocated in 2015, which represents 85% of all allocated Community Benefit square footage and 57% of all total allocated square footage to date.

Important to note is that the Small Addition category has an annual development limit of 20,000 square feet of floor area. As shown in Table 11, this annual limit has not been reached. Instead, the average annual allotment has been 7,897 square feet, which is only 39% of the annual allotment. The Planning Commission determines if any unused, expired, or withdrawn annual Small Addition square footage is

<sup>20</sup> 226 E. Anapamu St. (1,999 square feet), 302 W. Montecito St. (4,000 square feet), and 32 W. Carrillo St. (785 square feet)

rolled over to either the following year's Small Addition category allotment or to the Community Benefit category allotment. In 2018, two projects<sup>21</sup>, comprising 2,100 square feet of allocated Small Addition, were expired or withdrawn from previous annual allocations and are anticipated to be reallocated by the Planning Commission in early 2019. To date, all unused allotments have been rolled over to the Community Benefit category.

**Table 11: Growth Management Program Allocations (square feet) as of August 31, 2018**

GMP Category	Community Benefit	Small Addition	Vacant Property	Total
<b>2013</b>	8,990	3,987	0	12,977
<b>2014</b>	9,700	2,587	6,500	18,787
<b>2015</b>	149,000	9,358	738	159,096
<b>2016</b>	7,264	15,867	32,302	55,433
<b>2017</b>	0	7,684	0	7,684
<b>2018*</b>	0	6,784	113	6,897
<b>Total Used</b>	174,954 (26%)	46,267 (14%)	39,653 (11%)	260,874 (19%)
<b>Total Remaining</b>	485,563 (74%)	293,216 (86%)	310,347 (89%)	1,089,126 (81%)

\* Includes only projects that were allocated square footage on or before August 31, 2018

## Nonresidential Development in the Pipeline

As of August 31, 2018 there were 201 nonresidential development projects in the pipeline, comprising 260,425 square feet. Of these 201 projects, 45 (22%) were pending, 75 (36%) were approved, and 84 (42%) has received a building permit. As shown in Table 12, of the 260,425 square feet of nonresidential development in the pipeline, 38% (99,080 square feet) was pending, 22% (57,454 sq. ft.) was approved, and 40% (103,891 square feet) has received a building permit. Consistent with trends to date, the vast majority (88%) of these projects are located in the Downtown (55%) and Airport (33%) development areas, which suggests that future development will continue to be located in the areas prioritized by the GMP.

**Table 12: Nonresidential Development (square feet) in the Pipeline by GMP Development Area as of August 31, 2018**

Status	Down-town	Upper State	Mesa	Riviera	Coast Village	Airport	All Areas
<b>Pending</b>	83,406	11,800	1,055	0	8,74	1,945	99,080
<b>Approved</b>	12,560	-1,833	0	0	4,846	41,881	57,454
<b>Building Permit Issued</b>	47,013	13,391	0	-1,617	3,966	41,138	10,3891
<b>Total</b>	142,979	23,358	1,055	-1,617	9,686	84,964	260,425

<sup>21</sup> 21 W Arrellaga expired (495 square feet) and 401 & 409 E Haley St was withdrawn by the applicant (1,605 square feet)

## Potential Nonresidential Development

When nonresidential floor area is demolished, it results in a “credit” that can be used on-site or potentially transferred to another site through a Transfer of Existing Development Rights. Because Demolition Credit represents nonresidential development rights, it serves as an indicator of potential future development. Currently, the vast majority (80%) of Demolition Credit is in the Downtown Development Area (51%) and Airport Development Area (29%), largely due to the amount of Demolition Credit that occurred in these areas prior to the GMP effective date. However, as shown in Table 13, the majority (54%) of additional Demolition Credit (and thus, development potential) since the GMP became effective is in the Downtown Development Area, which is consistent with the goals of the GMP.

**Table 13: Demolition Credit (square feet) by GMP Development Area as of August 31, 2018\***

Year	Down-town	Upper State	Mesa	Riviera	Coast Village	Airport	All Areas
<b>Pre GMP</b>	146,896	27,725	5,487	17,132	56	97,758	295,054
<b>2013**</b>	+2,879	0	0	0	0	+40,669	+43,548
<b>2014</b>	+8,976	0	0	0	0	0	+8,976
<b>2015</b>	+15,527	0	0	0	0	0	+15,527
<b>2016</b>	+2,410	0	0	0	0	0	+2,410
<b>2017</b>	+11,211	+24,402	0	0	0	0	+35,613
<b>2018***</b>	+397	0	0	0	0	-30,420	-30,023
<b>Total Δ under GMP</b>	+41,400	+24,402	0	0	0	+10,249	+76,051
<b>Total Demo Credit</b>	188,296	52,127	5,487	17,132	56	108,007	371,105

\*This table reflects the square footage of completed projects per year. Some of the included projects were approved prior to the GMP effective date. Some of the reported square footage includes demolished hotel rooms, which may be credited per demolished room rather than per demolished square footage.

\*\*Includes only projects that were completed after the April 11, 2013, GMP effective date.

\*\*\*Includes only projects that were completed on or before August 31, 2018.

## Recommendation

No apparent course corrections are needed to manage nonresidential growth. The Nonresidential Growth Management Program (GMP) is in its relative infancy and nonresidential development is occurring as the program envisioned. The Planning Commission will continue to annually evaluate which category any unused Small Addition allotments should be rolled into, based on the previous year’s development activity. It is recommended that nonresidential growth continue to be tracked and reported in the General Plan Implementation / Adaptive Management Program report.

# RESIDENTIAL DEVELOPMENT

## General Plan Policy Direction

For decades, the General Plan Housing Element has emphasized the development of a range of housing types, with an emphasis on producing subsidized, Affordable housing and multi-unit developments, as opposed to single unit development. The Growth Management Program and General Plan prioritize locating housing in multi-unit and commercially zoned areas that are served by transit and are close to jobs and services. As shown below, these efforts have been largely successful.

## Residential Development Activity

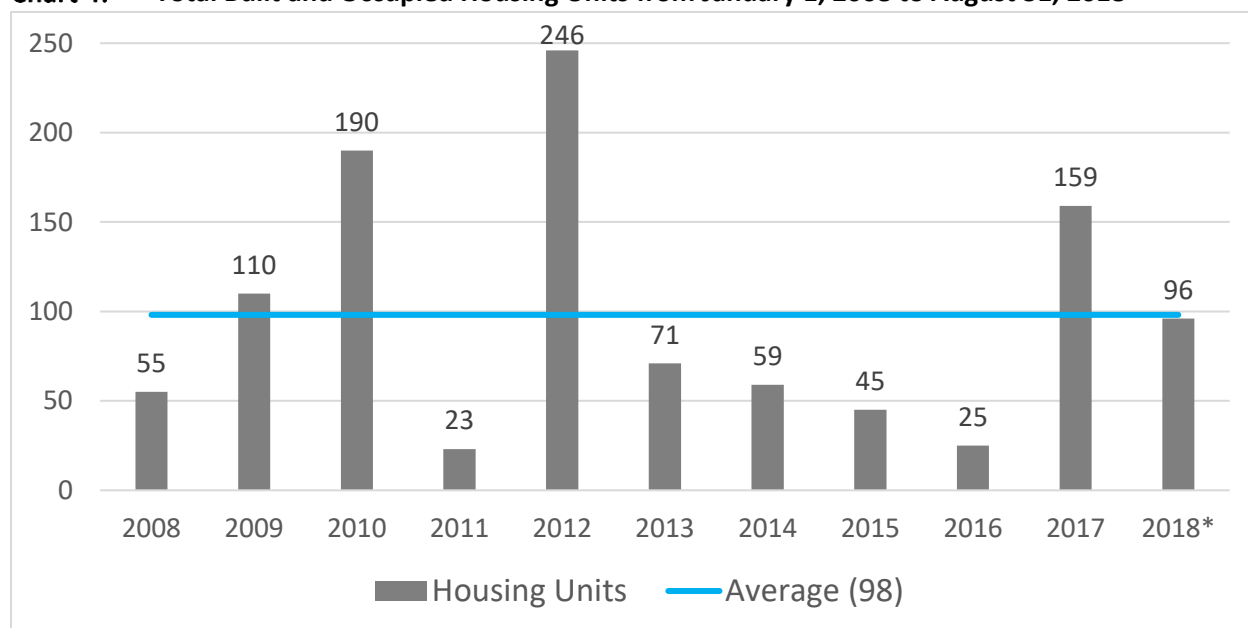
### General Plan Direction

The City's 2011 General Plan prioritizes the development of as much housing as possible within resource limits.

### Completed Residential Development

Since 2008, a total of 284 projects, comprising 1,079 net new housing units (3.8 units per project on average) have been built and occupied in the City. As shown in Chart 4 below, the average annual number of built and occupied housing units was 98, with periods of higher and lower activity. As had been anticipated in previous reports, due to the large number of units “in the pipeline,” there was a reversal of the downward trend in built and occupied units that occurred from 2012 to 2016, with 62% more built and occupied housing units in 2017 than the annual average over this period. And, with four months left in the year, the number of built and occupied units in 2018 (96) has nearly met the average annual rate of production since 2008.

**Chart 4: Total Built and Occupied Housing Units from January 1, 2008 to August 31, 2018**



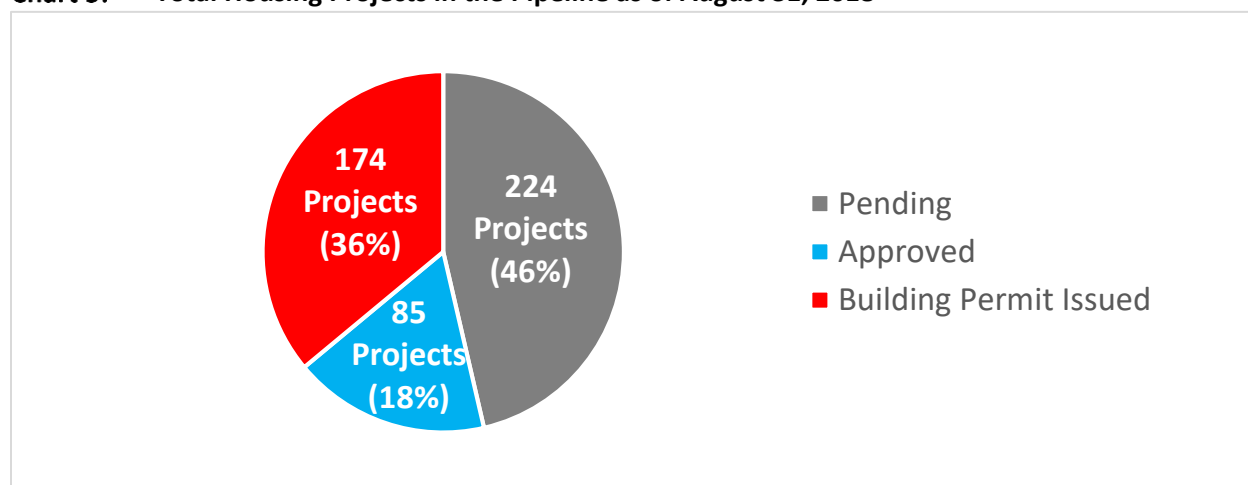
\*Includes only through August 31, 2018

### Residential Development in the Pipeline

As of August 31, 2018, there are 483 housing projects in the pipeline, which, as described in the “Housing Development Trends” section, represents an uptick in development activity. Of note is that average number of housing units per project (3.4) is 11% lower in the pipeline than the average annual value for completed construction since 2008 (3.8), which suggests that future completed construction may be comprised of projects with less units than were historically produced.

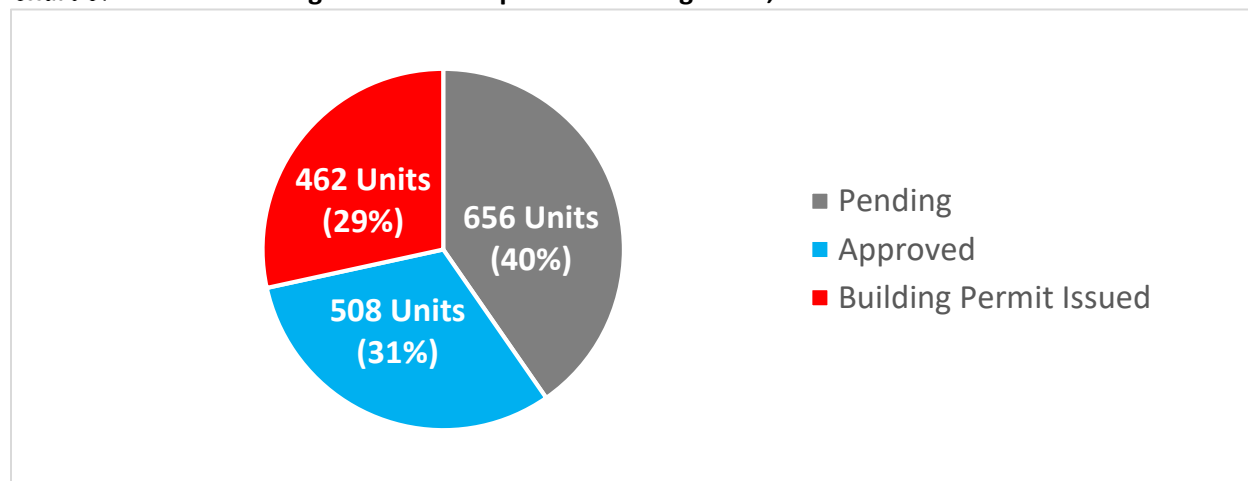
As shown in Chart 5, of the housing projects in the pipeline, 224 (46%) are pending, 85 (18%) are approved, and 174 (36%) have received a building permit. Currently, 25 of the housing projects (comprising 87 housing units) “in the pipeline” were submitted before the Great Recession began (December 2007) and are the result of Tentative Subdivision Map approvals being extended during the Great Recession by state legislation. Some of those projects may not be constructed; others are on sites that are the subject of revised proposals seeking approval under the AUD Program.

**Chart 5: Total Housing Projects in the Pipeline as of August 31, 2018**



The 483 projects in the pipeline comprise 1,626 housing units. As shown in Chart 6, of these, 656 units (40%) are pending, 508 units (31%) are approved, and 462 units (28%) have received a building permit.

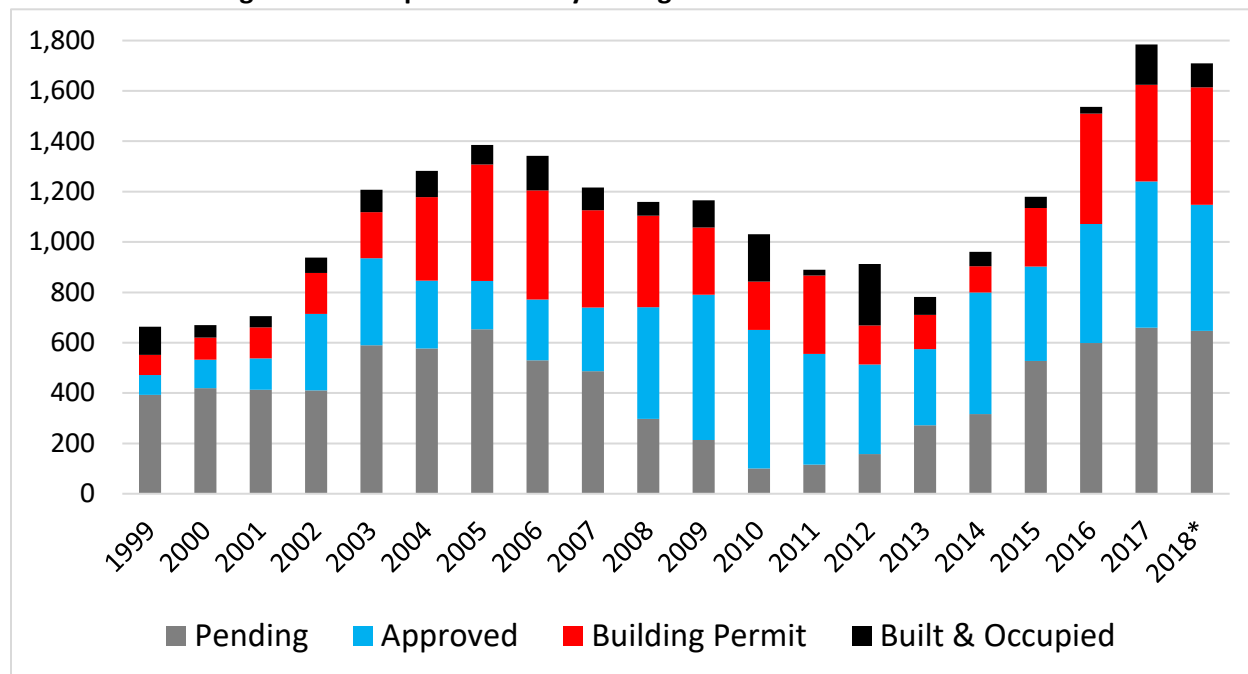
**Chart 6: Total Housing Units in the Pipeline as of August 31, 2018**



### Housing Development Trends

As shown in Chart 7, housing activity has varied over the last 20 years, including a downward trend in housing development from 2005 to 2013. Since then, activity has continually increased, with 2017 having the highest annual amount of activity over this time period. With four months still left in the year, the activity in 2018 is on pace to exceed the 2017 value. Furthermore, since 1999, on average, each year there were 1,034 units in the pipeline and 92 units built and occupied. Thus far in 2018, 92 units have been built and occupied and 1,626 units are in the pipeline (57% higher than the 20 year annual average).

**Chart 7: Housing Unit Development Activity During the Last 20 Years**



\*Includes only through August 31, 2018

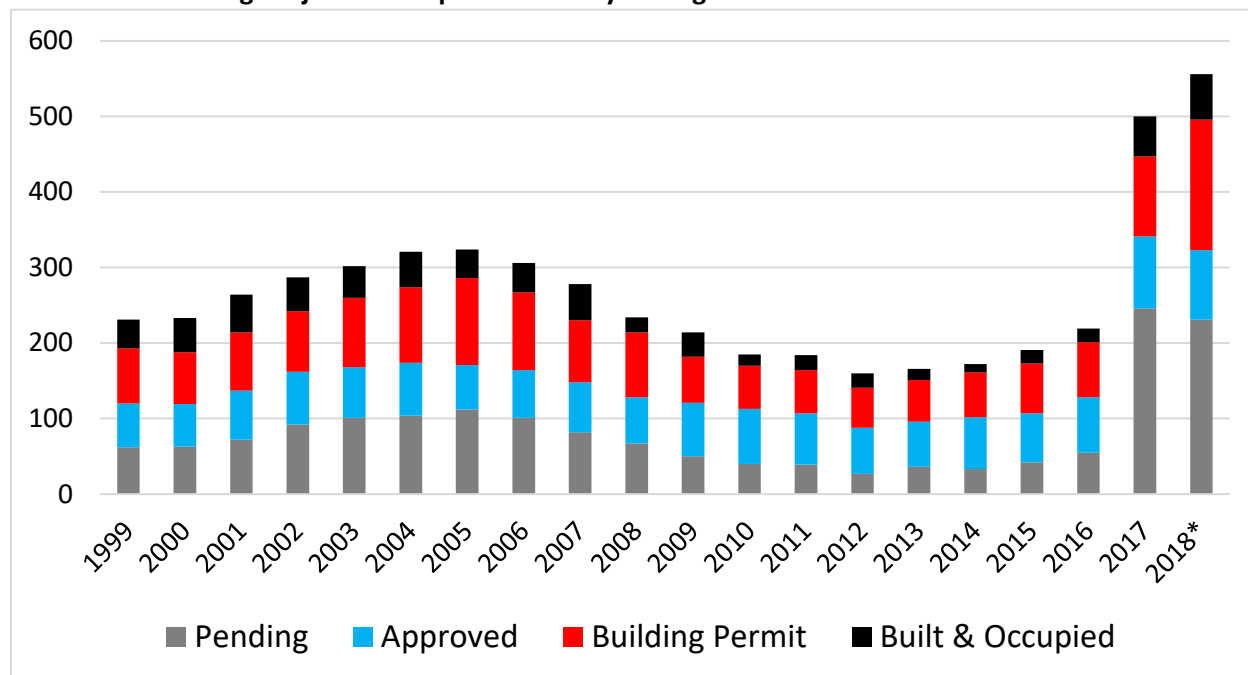
This recent increase in development activity suggests that the annual number of housing units built and occupied will likely continue to increase in the coming years as these projects are constructed. However, it's important to note that development activity is cyclical and it can often require several years (2.8 years on average) to move a project from the application phase to construction and occupancy. Not all projects are constructed. Some projects are withdrawn, some are revised, and some expire without being built. Because of this, each year there are significantly more projects in the pipeline than are built and occupied. Whether this increase in development activity will continue remains to be seen.

A new driver of increased housing development in the City is the State's recently amended Accessory Dwelling Unit (ADU) law, which became effective January 1, 2017. As shown in Chart 8, the number of residential projects that are in the pipeline or built and occupied has gradually varied over the last 20 years. However, there was an abrupt increase in 2017, when the number of housing projects in the pipeline or built and occupied was double that of the previous year. This increase continued into 2018, and with four months left in the year, there are more housing projects (and twice the average) in the pipeline or built and occupied than any other year during this time period. This is largely due to the 375



ADU projects that, as of August 31, 2018, represent 69% of all pipeline and built and occupied housing projects in 2018. Because each ADU project only creates one new housing unit, ADU projects represent a much smaller (23%) portion of all pipeline or built and occupied housing units in 2018. This is, however, a stark contrast from the volume of units generated through the City's former Secondary Dwelling Unit and Accessory Dwelling Unit Ordinances (portions of which were superseded by the State's law and recently amended outside of the Coastal Zone to comply with State law), which on average generated less than two units (and one per project) per year, over the last twenty years. As of August 31, 2018, 402 ADU applications have been submitted to the City since the effective date of the amended ADU law. Of these, 65 are built and occupied and 14 have expired, been withdrawn by the applicant, or been denied.

**Chart 8: Housing Project Development Activity During the Last 20 Years**

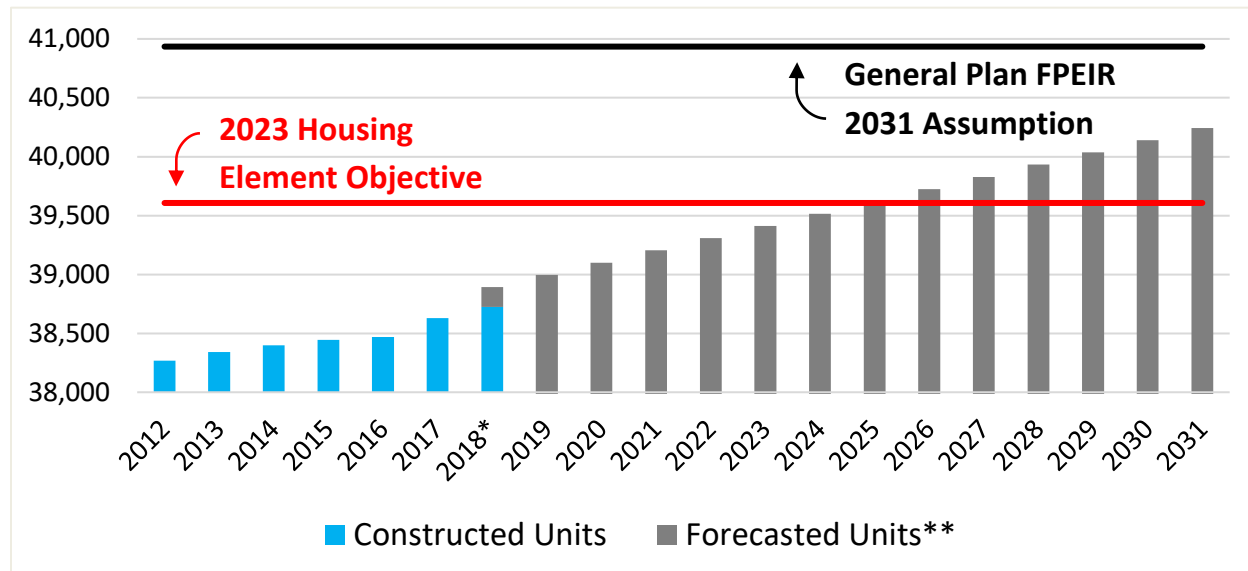


\*Includes only through August 31, 2018

### Recommendation

No apparent course corrections are needed to manage total residential development. The 2011 General Plan Certified FPEIR analyzed the City's resources and assumed a citywide residential buildout of 2,795 net new dwelling units over the plan's 20 year timeline. With 34% of the planning period completed, only 25% of this assumed total has been built. While the 2011 General Plan Certified FPEIR does not include an assumption for the number of units built each year, the rate of completed construction since the 2011 General Plan was adopted is 26% less than what was assumed, if the 2,795 assumed units were evenly distributed over the planning period. Furthermore, if the current development rate were to continue through the planning period, 716 fewer units will be built than assumed in the 2011 General Plan Certified FPEIR. However, housing development has historically been cyclical, with periods of high and low development activity. Given the high number of units in the pipeline, it appears that development activity is continuing to increase, which suggests that the number of constructed units will likely increase as these projects progress through the permitting process.

**Chart 9: Cumulative Constructed and Forecasted Housing Units During the 20 Year General Plan Timeline**



\*Includes housing units constructed through August 31, 2018 and forecasted through the rest of the year.

\*\*This forecast assumes that the average annual rate of completed construction since the 2011 General Plan was adopted will continue into the future. Given the large number of units in the pipeline, it is likely that the rate of completed construction will increase in the near term. However, given the cyclical nature of housing development, it is likely that that rate will also decrease prior to the completion of the 2011 General Plan's 20 year timeline.

Similarly, the 2015 Housing Element includes “Quantified Objectives,” of 1,208 new units (151 per year) constructed from 2015 to 2023. With 46% of this period completed, 325 units have been constructed, which is 41% fewer units built than targeted by the Quantified Objectives (554 units) over this period. However, the current number of housing units in the pipeline (1,626 units) is nearly double the number of additional housing units needed (883 units) to meet the Quantified Objectives by 2023. While it is near certain that not all of these projects will be built, there is a high likelihood that the Quantified Objectives will be met, or exceeded, by 2023 or sooner.

As a result, close monitoring of housing production will be necessary and it is recommended that housing continue to be tracked and reported in the General Plan Implementation and AMP report.

## Location of Residential Development

### General Plan Direction

One of the top priorities of the General Plan is to encourage workforce and affordable housing in the City's multi-unit and commercially-zoned areas that are served by transit and are close to jobs and services. As shown below, efforts to meet that objective have largely been successful. Relevant General Plan policies include:

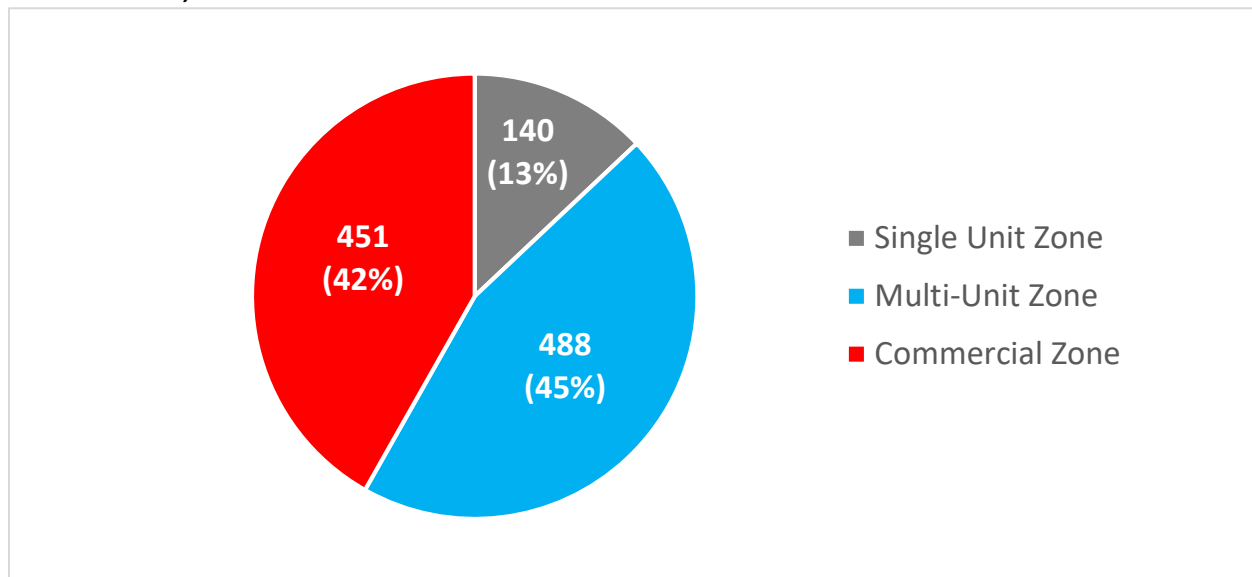
- **LG4. Principles for Development.** Establish the following Principles for Development to focus growth, encourage a mix of land uses, strengthen mobility options and promote healthy active living.

- **LG6. Location of Residential Growth.** Encourage new residential units in Multi-Family and Commercial areas of the City with the highest densities to be located in the Downtown, La Cumbre Plaza / Five Points area and along Milpas Street.
- **H10. New Housing.** Given limited remaining land resources, the City shall encourage the development of housing on vacant infill sites and the redevelopment of opportunity sites both in residential zones, and as part of mixed-use development in commercial zones.

#### Location of Completed Residential Development

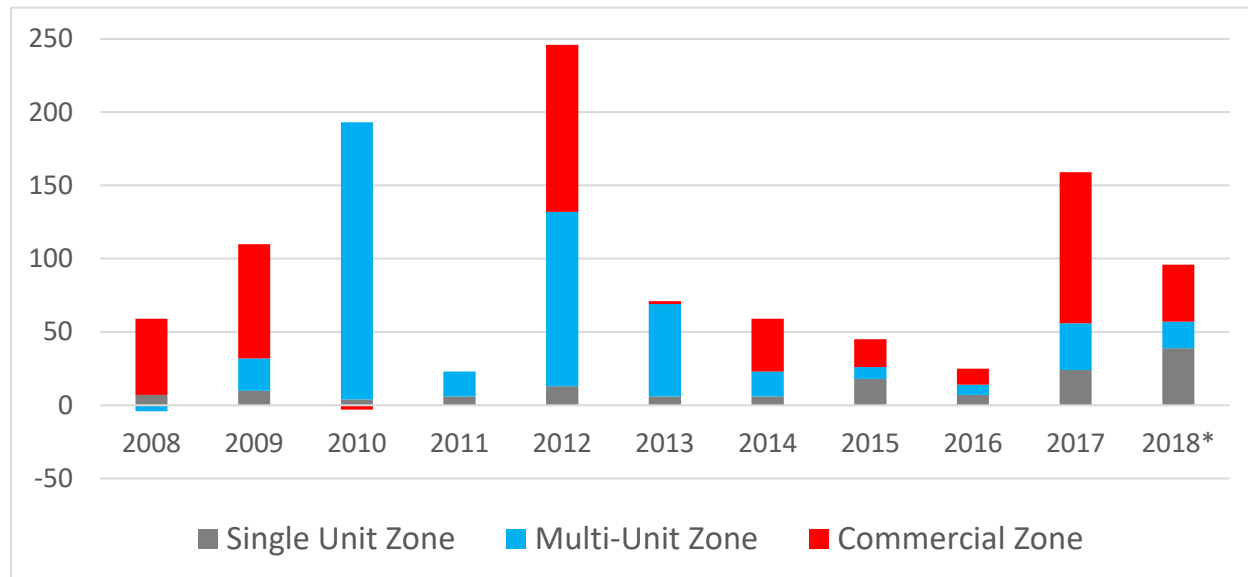
Since 2008, there have been annual fluctuations in the location and type of new housing units built and occupied. However, the vast majority of these units have been built in the City's multi-unit and commercial zone districts, which are better served by transit and close to jobs and services. Furthermore, of the 1,079 housing units built and occupied since 2008, 939 units, or 87%, were located in the multi-unit (488 units) or commercial (451 units) zones as shown in Chart 10.

**Chart 10: Cumulative Location of Built and Occupied Housing Units from January 1, 2008 to August 31, 2018**



While these cumulative figures suggest that the General Plan direction to locate development in commercial and multi-unit zones is being achieved, there was a recent significant jump in the amount of units built and occupied in single unit zones. As described above, this change is largely due to the increase in the number of Accessory Dwelling Unit projects. Since 2008, on average 13 units were built and occupied each year in single unit zones. However, as shown in Chart 11, with four months left in the year, 2018 has three times more units (39) in single unit zones than the annual average during this period. Similarly, 41% of built and occupied housing units in 2018 were located in single unit zones, which is double the average (18%).

**Chart 11: Annual Location of Built and Occupied Housing Units from January 1, 2008 to August 31, 2018**

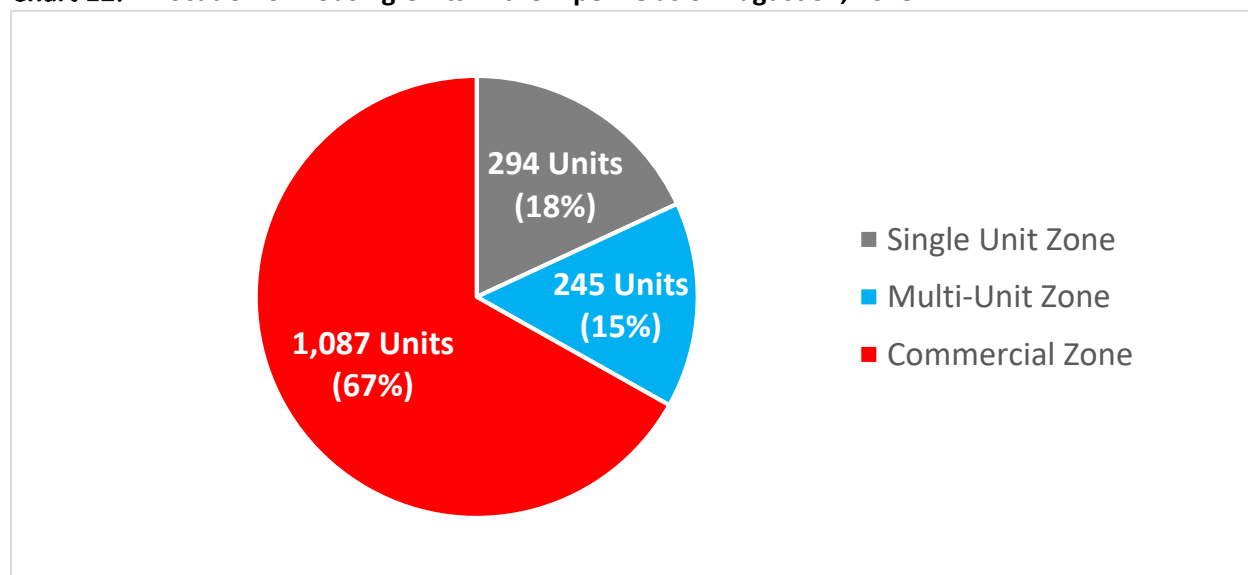


\*Includes only through August 31, 2018

#### Location of Residential Development in the Pipeline

As previously described, not all housing projects in the pipeline will be constructed. However, these projects provide an indication of where future built and occupied units may be located. As shown in Chart 12, currently 82% of housing units in the pipeline are located in multi-unit (15%) or commercial (67%) zones, which is below the ten year average (87%) for built and occupied units. This suggests that the trend of increased production of housing units in the single unit zones will likely continue into the future. Consistent with the trend in built and occupied units, this increase is primarily due to the increase in number of Accessory Dwelling Unit projects.

**Chart 12: Location of Housing Units in the Pipeline as of August 31, 2018**



## Recommendation

No apparent course corrections are needed to manage the location of residential growth. While there was a recent increase in the number of units built and occupied in single unit zones due to changes in State Accessory Dwelling Unit law, the vast majority of housing is still being developed in multi-unit or commercial zones. It is recommended that the location of residential development continue to be tracked and reported in the General Plan Implementation and AMP report.

## Affordable Housing Development

### General Plan Direction

Housing that is affordable to extremely low, very low, low, moderate or middle-income levels, or otherwise considered below-market rate due to price restrictions, is considered Affordable housing. Producing new, and maintaining existing, Affordable housing is a key priority of the City's General Plan. Of note is that the City's Redevelopment Agency was dissolved in January 2012 and had previously invested millions of dollars in Affordable<sup>22</sup> housing projects. Relevant General Plan policies include:

- **LG1. Resource Allocation Priority.** Prioritize the use of available resource capacities for additional affordable housing for extremely low, very low, low, moderate and middle income households over all other new development.
- **LG5. Community Benefit Housing.** While acknowledging the need to balance the provision of affordable housing with market-rate housing, new residential development in Multi-Family and Commercial zones, including mixed-use projects, should include affordable housing and open space benefits.
- **H11. Promote Affordable Units.** The production of affordable housing units shall be the highest priority and the City will encourage all opportunities to construct new housing units that are affordable to extremely low, very low, low, moderate and middle income owners and renters.

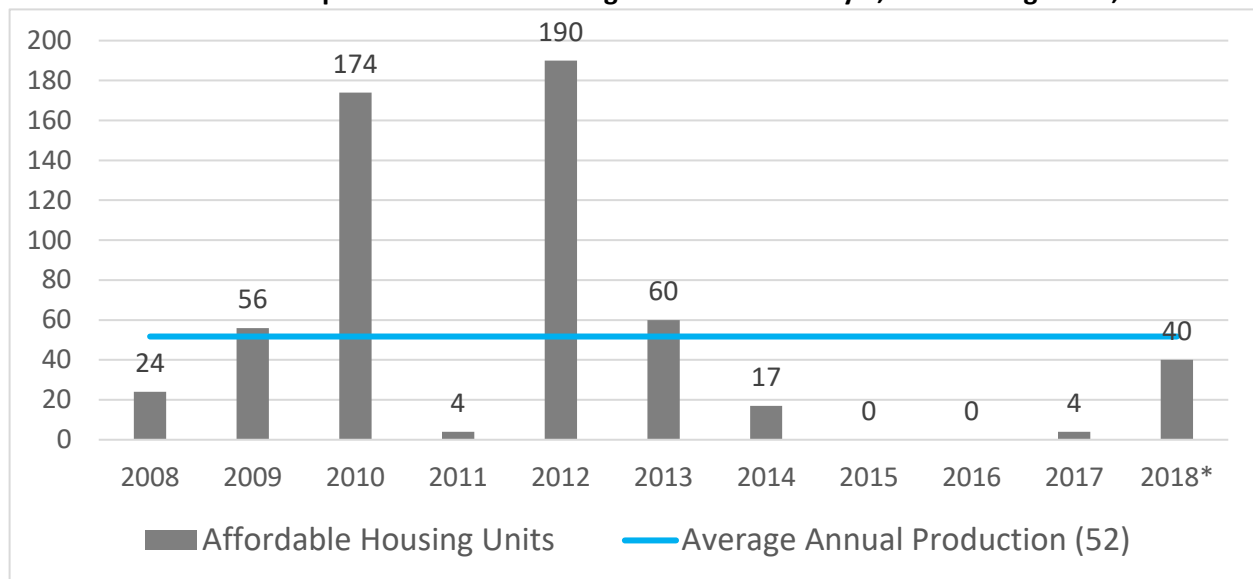
### Completed Affordable Housing Development

Since 2008, as shown on Chart 13, 569 Affordable housing units have been built and occupied in the City. Over this period, there were, on average, two projects built and occupied each year. And, on average, 52 units (27 units per project) were built and occupied each year. Because Affordable housing projects often feature a high number of units per project, a small number of large projects may skew annual comparison, as in 2010, when one project (Saint Vincent's) encompassed 97% (170 units) of the total annual built and occupied Affordable units for that year. That being said, there has been an apparent slowing in the number of Affordable Housing units built and occupied over the last five years, with no units constructed in 2015 or 2016, and only four units from one project (240 West Alamar Avenue) constructed in 2017. With four months left in the year, there was an increase in 2018, due to the completion of one 40 unit project (510 North Salsipuedes Street). However, this still remains below the average annual rate of built and occupied Affordable units over this time period.

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<sup>22</sup> Use of a capitalization of the word Affordable denotes a unit or project that meets income criteria established by the City for extremely low, very low, low, moderate or middle-income levels.

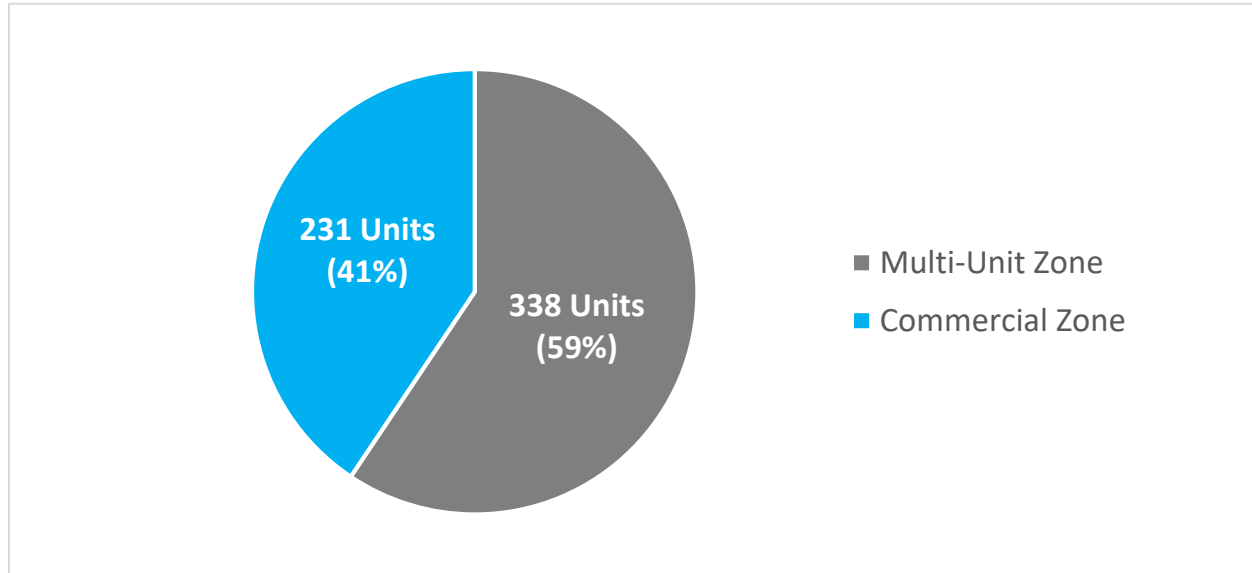
**Chart 13: Built and Occupied Affordable Housing Units from January 1, 2008 to August 31, 2018**



\*Includes only through August 31, 2018

As shown in Chart 14, all Affordable housing that has been built and occupied since 2008 was located in multi-unit (59%) or commercial (41%) zones.

**Chart 14: Location of Built and Occupied Affordable Housing Units from January 1, 2008 to August 31, 2018**

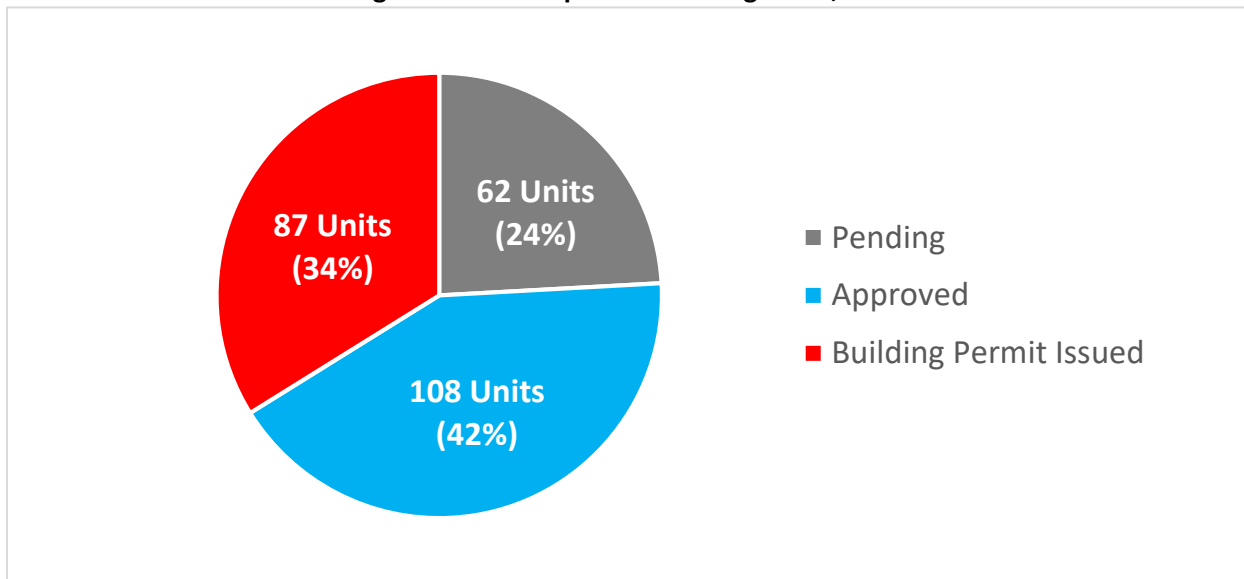


#### Affordable Housing Development in the Pipeline

As noted above, in January 2012, the City's Redevelopment Agency was dissolved and as shown in Chart 13, subsequent years' production of Affordable housing dramatically decreased. However, as of August 31, 2018, 12% of all housing units in the pipeline are Affordable units. As shown on Chart 15, of the 257 Affordable units in the pipeline, 62 (24%) are pending, 108 (42%) are approved, and 87 (34%) have received a building permit. These units are due to 12 projects, with an average size of 21 Affordable units

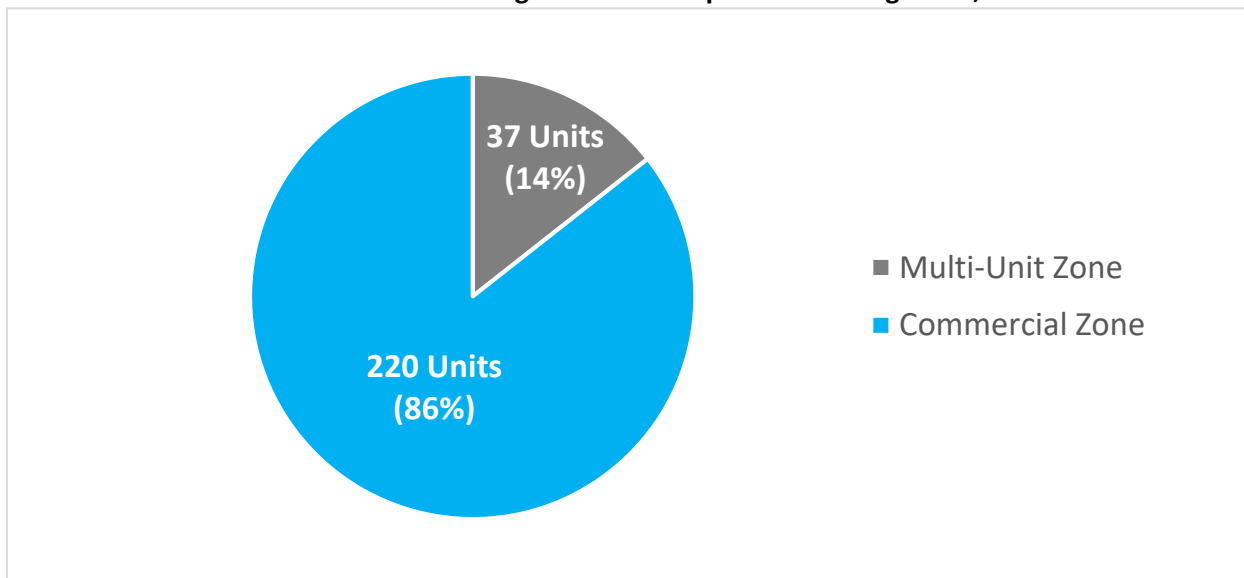
per project, which is less than the average annual value (27 units per project) for built and occupied Affordable housing projects, as described above.

**Chart 15: Affordable Housing Units in the Pipeline as of August 31, 2018**



As shown on Chart 16, all Affordable housing in the pipeline is located in multi-unit (14%) or commercial (86%) zones, as envisioned by the 2011 General Plan. Of note is that the Affordable units in the pipeline reflect a shift towards more units in commercial zones and less in multi-unit zones. However, as noted above, Affordable housing projects may be large in size, and one project may reverse this shift.

**Chart 16: Location of Affordable Housing Units in the Pipeline as of August 31, 2018**



#### **Recommendation**

No apparent course corrections are needed to manage the location of Affordable housing development, as it has been occurring where the 2011 General Plan has envisioned. However, the production of

Affordable housing units has been significantly less than targeted by the State mandated Regional Housing Needs Allocation (RHNA)<sup>23</sup>, which quantifies the housing need for the City, and there has been a decrease in the number of built and occupied Affordable housing units over the last five years. With the passage of the State's 2017 Legislative Housing Package, including SB35, which allows for a "by-right" approval process for housing development in jurisdictions that are not achieving their RHNA targets, comes an increased need to produce Affordable housing units to maintain local control of the development review process. Therefore, is recommended that programs that facilitate the production of Affordable housing continue to be funded, and where feasible, be expanded. It is recommended that housing continue to be tracked and reported in the General Plan Implementation and AMP report.

## Average Unit-Size Density Incentive Program

### General Plan Direction

The 2011 General Plan introduced the Average Unit-Size Density (AUD) Incentive Program, which facilitates smaller housing units through the allowance of increased densities and development incentives in select areas of the City with the intent that smaller unit sizes may result in housing that is affordable to the City's workforce. Relevant General Plan policies include:

- **LG 6.1. Average Unit-Size Density Incentive Program.** Amend the Zoning Ordinance to incorporate an Average Unit-Size Density Incentive Program in multi-family and commercial zones based on smaller unit sizes and higher densities adjacent to transit and commercial uses and to implement Housing Element policies for higher densities for affordable and/or Community Benefit projects.
- **LG6.2. Average Unit Density Components.** The program developed under LG6.1 shall be in effect for 8 years from implementing ordinance adoption or once 250 units have been developed in the High Density areas, whichever occurs sooner. The program will include the following components:
  - a. The 250 unit limitation shall apply to projects developed in the High Density and/or Priority Housing Overlay;
  - b. All units within a project developed at either the High Density or Priority Housing Overlay will be included in the 250 unit maximum;
  - c. The minimum parking requirement for projects using the Average Unit-Size Density Incentive Program is 1 space per unit; and
  - d. A report to Council will be made to analyze the effectiveness of the program as part of the Adaptive Management Program for the General Plan, and as the trial period is approaching its end, the Council will consider whether to extend or modify the program. In absence of Council review before the trial period expires, the allowed residential density will default to the Variable Density standards allowed under SBMC 28.21.080. F as it existed in 2011.
- **LG6.3 Priority Housing Overlay.** Encourage the construction of rental and employer housing and limited equity co-operatives in select multi-family and commercial zones where residential use is allowed by providing increased density (over AUD Program).

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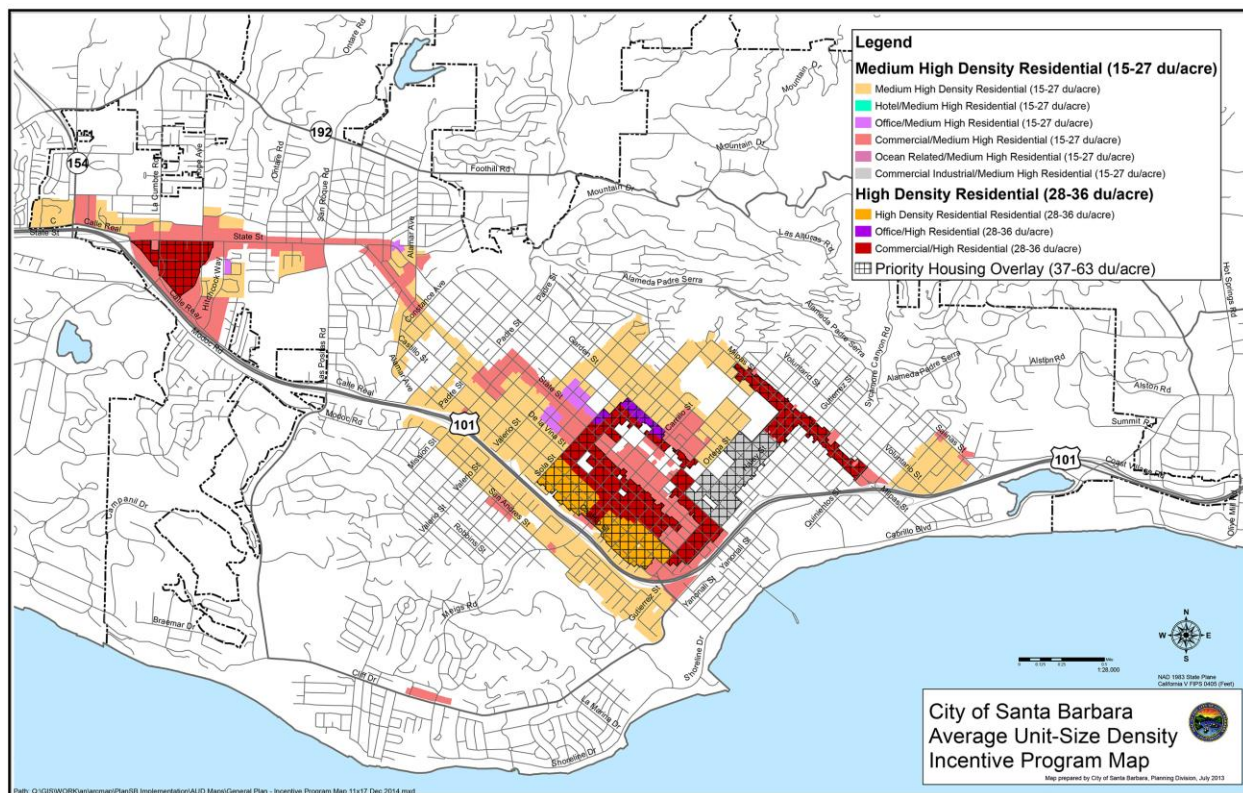
<sup>23</sup> City of Santa Barbara 2017 Housing Element Implementation Report.  
<https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=210542>



## Background

The City Council adopted the AUD Program ordinance on July 30, 2013, as SBMC Chapter 28.20, with three density tiers, as described below: Priority Housing, High Density, and Medium-High Density.

**Figure 3: Average Unit-Size Density Incentive Program Map**



The Priority Housing Tier includes the following three categories: Employer-Sponsored Housing; Limited-Equity Housing Cooperatives; and Rental Housing. To date, all Priority Housing applications have fallen into the Rental Housing category. Since the program was adopted, no applications for Employer-Sponsored or Limited-Equity Cooperatives have been received.

The High Density Tier allows density levels that were previously only allowed with: (1) Modifications; and (2) long-term deed restrictions for very low, low or moderate-income households.

The Medium-High Density Tier allows the same density range of 15-27 units/acre that was possible through the previous Variable Density standards without modifications or income-based deed restrictions. Except in the Coastal Zone where the AUD Program has not been certified by the Coastal Commission, the Variable Density standards have been replaced for the duration of the AUD Program.

The AUD program was adopted for a trial period of either eight years or until 250 units have been constructed (as evidenced by the issuance of a Certificate of Occupancy) in the areas designated for the High Density tier (range of 28-36 units/acre) or the Priority Housing Overlay (range of 37-63 units/acre), excluding Affordable units, whichever occurs earlier. Based on current activity, the trial period is projected to end by 2020.

### **AUD Program Ordinance Amendments**

At the request of the Planning Commission, the 2016 General Plan Implementation and AMP Report included a significant focus on the AUD Program. Following discussion at the 2016 Fall City Council and Planning Commission Work Session, a Housing Task Force (HTF) was created by City Council in December 2016 to evaluate certain aspects of the AUD Program based on concerns about the Program meeting its intended objectives. As directed by City Council, the HTF was authorized to review and consider the following objectives:

- Analyze effectiveness of AUD Program to provide housing for existing Santa Barbara residents/employees; explore options to assess impact fees or otherwise mandate the construction of rental housing affordable to households earning 80 to 120% of the Area Median Income;
- Investigate adjustments to parking requirements based on location, bulk, size, and scale and desired outcomes, such as smaller units, units with fewer bedrooms, parking in-lieu fees, or other benefits, in exchange for parking requirement reductions;
- Consider the potential sources of information that will inform the Task Force, Developers, and Stakeholders as to the effect, if any, when evaluating certain aspects of the AUD Program;
- Explore ways to encourage employer-sponsored and limited-equity cooperative housing development; and
- Consider AUD map amendment to exclude mobile home parks (added by Council at its June 13, 2017 meeting).

In August 2017, City Council directed staff to develop a program to limit the number of building permits issued for projects under the AUD Program in order to meter out development. In July 2017, City Council authorized the preparation of a Nexus Study and Economic Feasibility Study on the affordable housing aspects of the AUD Program to inform future HTF recommendations with the objectives of analyzing effectiveness of AUD Program to provide housing for existing Santa Barbara residents/employees, exploring options to assess impact fees or otherwise mandate the construction of rental housing affordable to households earning 80 to 120% of the Area Median Income and investigating adjustments to parking requirements based on location, bulk, size, and scale and desired outcomes, such as smaller units, units with fewer bedrooms, parking in-lieu fees, or other benefits, in exchange for parking requirement reductions. HTF also recommended that Council authorize the expansion of the scope to analyze and discuss the following new objectives further:

- Explore ways to encourage employer-sponsored and limited-equity cooperative housing development;
- Consider the potential sources of information that will inform the Task Force, Developers, and Stakeholders could use when evaluating certain aspects of the AUD Program;
- Encourage more residential development in the Downtown, including associated fees and incentives;
- Study the geographic boundaries of the AUD Program city-wide; and
- Explore a point system or cap on permits per year to meter AUD development and focus the program on target income ranges.

In August 2017, and February 2018, based on HTF's recommendation, City Council initiated ordinance amendments to the AUD Program that will be completed in separate work efforts, described below. The

City Council did not direct staff to further study an annual limitation on the number of building permits issued for AUD Program projects.

*AUD Program Amendments In-Progress:*

- Requiring two parking spaces for AUD units with three or more bedrooms, in projects located outside of the Central Business District (CBD).
- Prohibiting all units approved under the AUD Program from future conversion to a hotel use.
- Amend the AUD Program to remove development incentives for properties currently developed as mobilehome parks.

*Potential Future AUD Program Amendments*

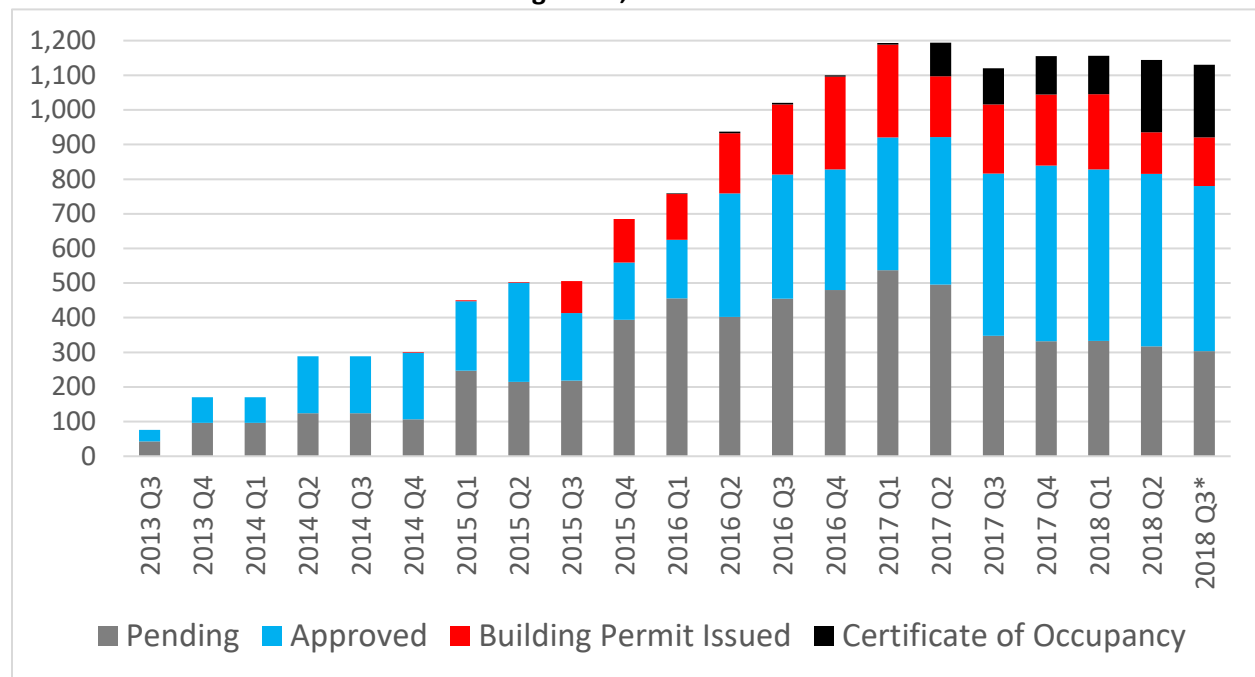
- Require AUD Program projects with 10 units or more to provide at least 10% of the units onsite at rental rates affordable to households at the Moderate Income level (80% to 120% of Area Median Income).
- Require AUD Program projects with less than 10 units to pay an affordable housing in-lieu fee of up to \$20.00 per square foot.
- Consider allowing increased residential density and other development incentives in the Central Business District.
- Consider revising the geographic boundaries of the AUD Program and location of the Priority Housing Overlay.
- Consider additional changes to AUD Program parking requirements.
- Address the AUD Program initial trial period of eight years or until 250 units are constructed in the High Density or Priority Housing Overlay Areas.
- Other procedural actions as directed by the City Council.

**AUD Program Development**

*Total AUD Program Development*

As of August 31, 2018, there are 70 active or completed multi-unit or mixed-use projects that have been submitted to the City utilizing the AUD Program (14 additional projects were submitted that have expired or were withdrawn or revised by the applicant). Of these, 16 projects are pending approval, 31 have been approved, 12 have received a building permit, and 11 are built and occupied. These 70 projects include 1,130 new units, of which, 303 (27%) are pending approval, 477 (42%) have been approved, 141 (12%) have received a building permit, and 209 units (18%) are built and occupied. The average unit size is 717 square feet and the average density is 36 units/acre. As shown in Chart 17, there was a leveling off in the amount of overall AUD Program unit development activity in the first quarter of 2017. Since then, some projects have advanced through the development process, while others have expired or been withdrawn.

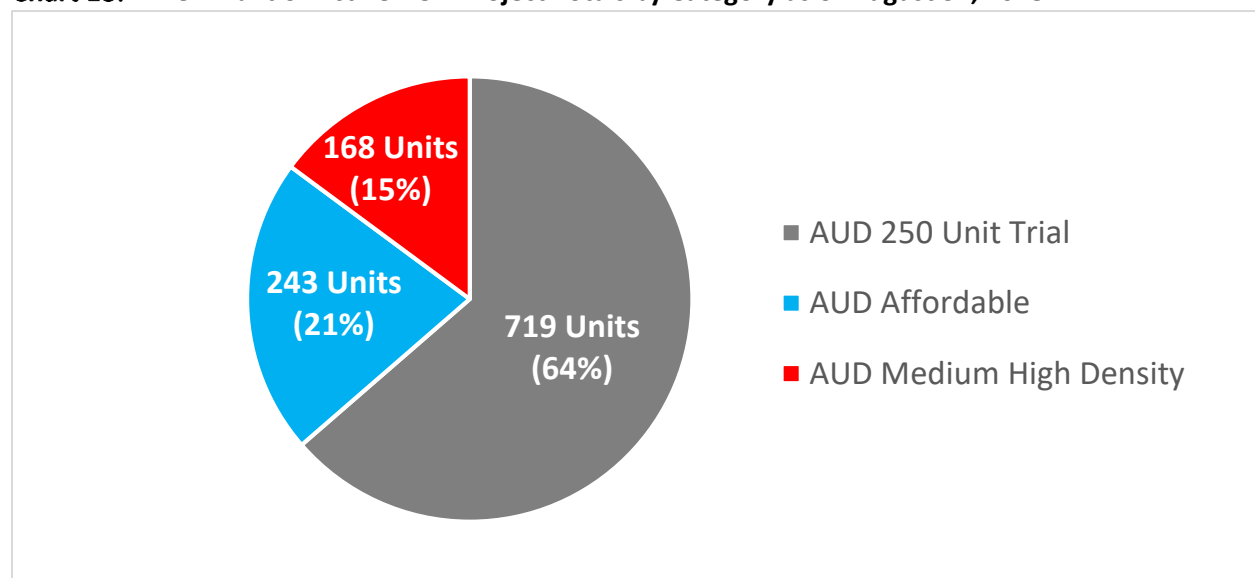
**Chart 17: Cumulative AUD Units as of August 31, 2018**



\*Includes only through August 31, 2018

As described above, the AUD Program includes a range of density tiers and development incentives to facilitate different types of units. As shown on Chart 18, of the 1,130 active or built and occupied units in the AUD Program, 719 (64%) are in the High Density Tier or Priority Housing Overlay (250 Unit Trial Period Category), 243 units (21%) are in the AUD Program Affordable Category, and 168 units (15%) are in the AUD Program Medium High Density Tier Category.

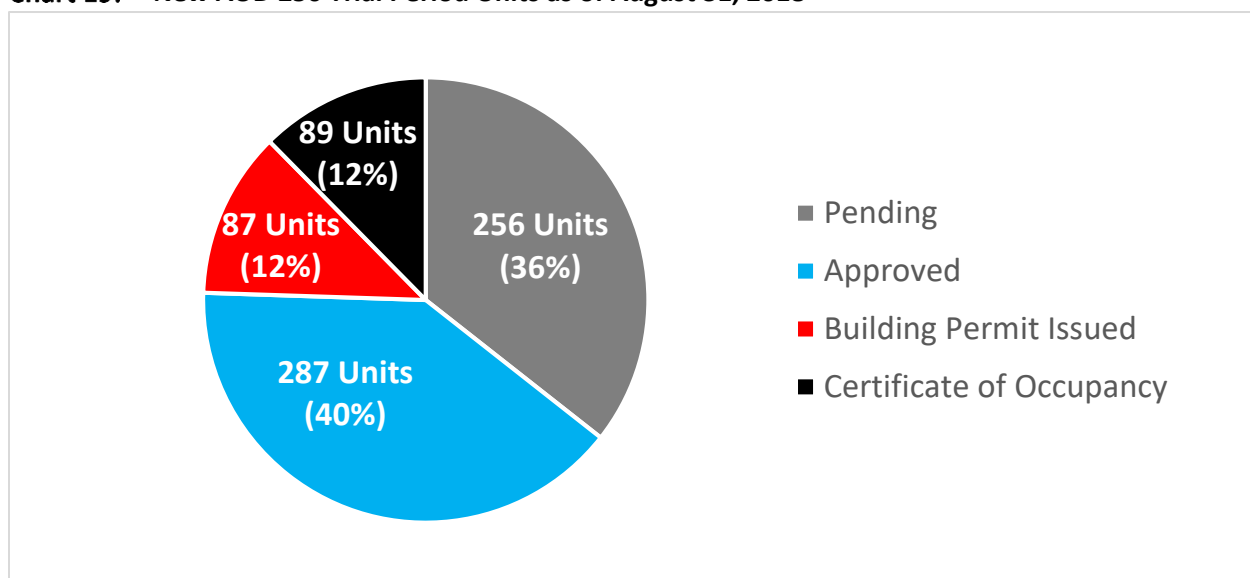
**Chart 18: New Built or Active AUD Project Totals by Category as of August 31, 2018**



### *High Density Tier and Priority Housing Overlay (250 Trial) Development*

As previously mentioned, only High Density Tier and Priority Housing Overlay units with Certificate of Occupancy status contribute towards the 250 unit trial period for the AUD Program. As of August 31, 2018, only one project (3885 State Street / The Marc), comprising 89 units, has reached that status. Another project at 604 E. Cota Street, with 29 units, has received a Temporary Certificate of Occupancy. There are also 28 other projects in the pipeline (comprising 601 units) that may contribute to the 250 unit trial period should Certificate of Occupancy status be reached for those proposed units before the trial period ends. It is estimated that the 250 unit trial period will be reached by 2020, although this is highly dependent on certain unpredictable factors. Of the units in this category, 256 (36%) are pending, 287 (40%) are approved, 87 (12%) have received a building permit, and 89 (12%) have received a certificate of occupancy. The average unit size is 695 square feet and the average density is 47 units/acre.

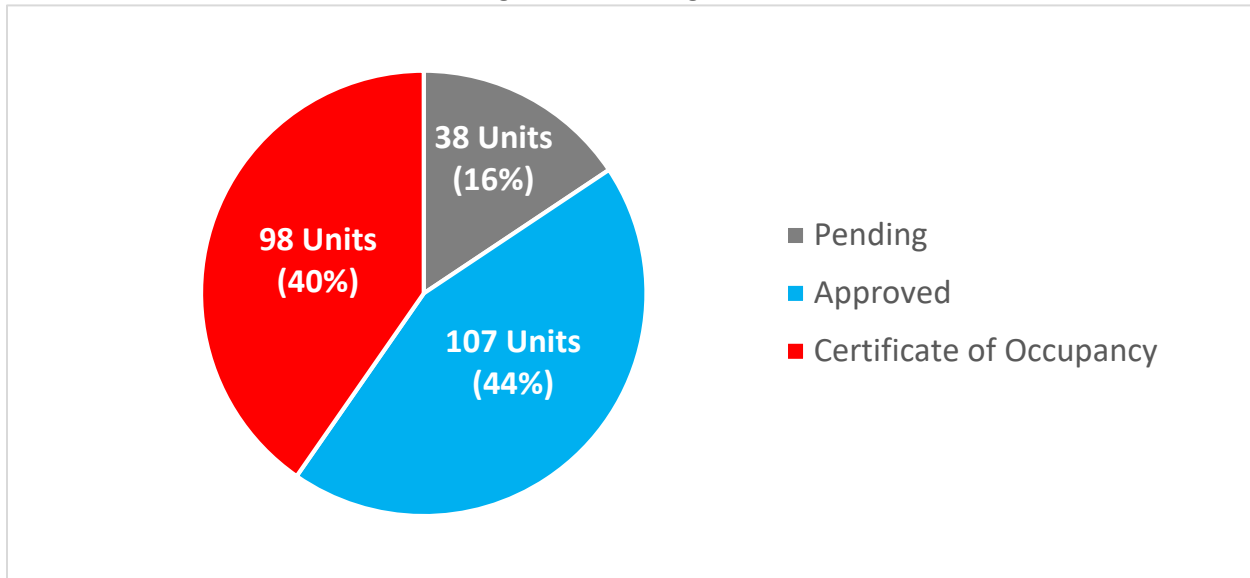
**Chart 19: New AUD 250 Trial Period Units as of August 31, 2018**



### *AUD Program Affordable Development*

AUD Program Affordable projects and units are tracked because they are identified in the AUD Program ordinance. However, these Affordable housing projects could be proposed and approved without the AUD Program, by using other processes for relief from development standards. As of August 31, 2018, five Affordable housing projects, with a combined total of 243 units, have been proposed. Currently, two of these projects (510 N Salsipuedes Street and 3869 State Street) have been built and occupied. In total, as shown in Chart 20, 38 (16%) are pending, 107 (44%) are approved, and 98 (40%) have received a certificate of occupancy. The average unit size is 497 square feet and the average density is 64 units/acre.

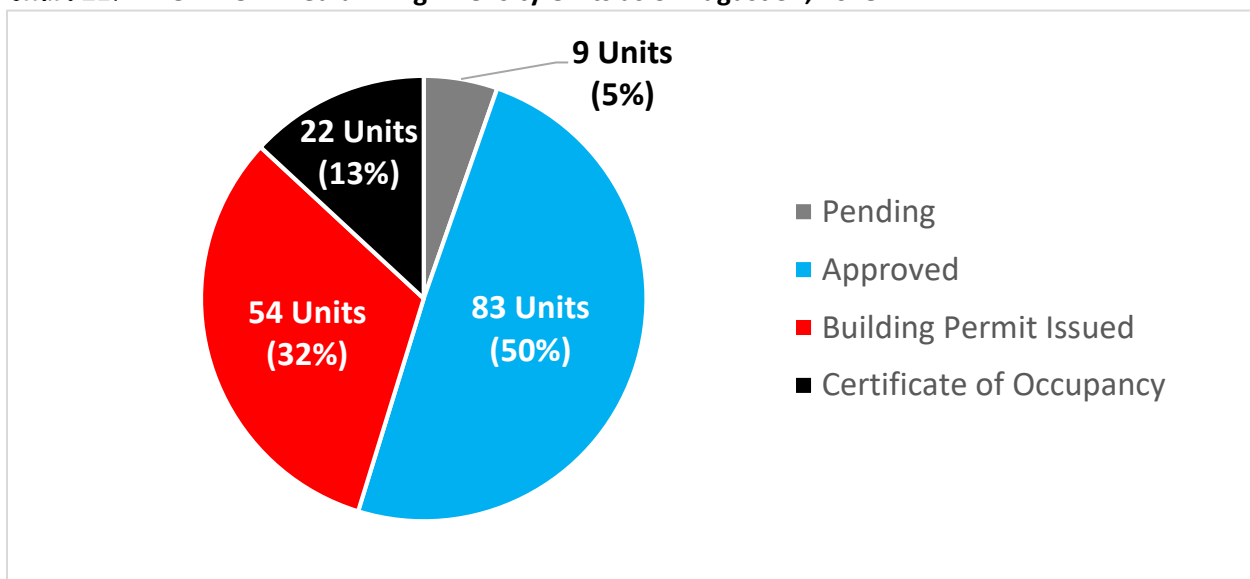
**Chart 20: New AUD Affordable Housing Units as of August 31, 2018**



*Medium-High Density Tier Development*

As of August 31, 2018, as shown on Chart 21, there are 35 active or completed projects in the Medium-High Density Tier areas, with a combined total of 168 units. Of these units, 9 (5%) are pending, 83 (50%) are approved, 54 (32%) have received a building permit, and 22 (13%) have been built and occupied. As previously mentioned, units proposed within the Medium-High Density Tier areas are subject to the same density limitations that existed prior to the adoption of the AUD Program (15-27 units/acre) and do not contribute towards the 250 unit trial period. The average unit size is 768 square feet and the average density is 22 units/acre.

**Chart 21: New AUD Medium-High Density Units as of August 31, 2018**



**Recommendation**

It is recommended that Staff continue to proceed with the AUD Program Ordinance amendments as directed by the City Council and described above. It is recommended that the AUD Program continue to be tracked and reported in the General Plan Implementation AMP report.

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# Format & Content Considerations

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## “POSSIBLE IMPLEMENTATION ACTIONS TO BE CONSIDERED”

The 2011 General Plan implementation strategies are specific methods to achieve the vision of a more sustainable community and provide examples of programs and actions that the City may take to achieve goals and policies. When the 2011 General Plan was adopted, there was concern that the implementation strategies would commit the City to numerous, unfunded work programs. Therefore, a compromise was adopted to globally apply a subheading, “Possible Implementation Actions to be Considered” to all the implementation items throughout the document.

This has created ambiguity and confusion because some of these actions are on-going practices or standards that are already being implemented, others are examples of future work program items that may be undertaken as stated in the 2011 General Plan, and some are applied as policies. This in turn makes it unclear whether the actions are required. And, the heading is misleading for the public who would not be able to determine which actions are already implemented versus future work programs. Furthermore, some of the actions under this heading are required mitigation measures per the City’s 2011 General Plan Certified Final Program EIR.

## RECOMMENDATION

In 2016, the General Plan/AMP report recommended to modify the “Possible Implementation Actions to be Considered” heading because of the ambiguity and confusion it creates. This recommendation still stands that the “Possible Implementation Actions to be Considered” heading be modified as appropriate to one of the following headings:

- Ongoing Actions.
- Required Mitigation Measure Actions.
- Future Work Programs to be Considered.

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# Report Preparers

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# Reference Material

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The primary reference documents used in the preparation of this report include the following and are available at the Community Development Department, 630 Garden Street, Santa Barbara CA, or on the City of Santa Barbara's website.

Santa Barbara General Plan, December 2011

Historic Resources Element, October 2012

Housing Element, February 2015

2011 General Plan Certified Final Program Environmental Impact Report, March 2010

Santa Barbara Municipal Code

Internally generated data obtained from the Community Development Department's parcel and project data base, project application plans and documents, and other sources

California Department of Finance Population and Housing Estimates

Other sources of information utilized in the preparation of this report are informally cited throughout the text.

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