



December 1, 2023

Santa Barbara County Board of Supervisors
105 Anacapa Street
Santa Barbara, CA 93101

RE: Adoption of the 2023-2031 Housing Element; Agenda of December 5, 2023

Chair Williams and Members of the Board of Supervisors:

The League of Women Voters of Santa Barbara appreciates the opportunity to provide input on and support for the adoption of the County's Housing Element Update. The League is actively involved in housing issues in the region.

Comments on the Housing Element Final Draft

The League has previously provided comments to the staff (letter dated February 28, 2023) and the Board of Supervisors on the Housing Element and is pleased to see that many of our comments have been included in the proposed final Housing Element. The two most significant changes that the LWVSB supports are 1) identification of additional county owned properties for potential rezoning, and 2) studying options for long-term funding of affordable housing. Given that the total number of unincorporated County affordable units required in this next cycle is 2,817 very low- to moderate-income units, or 68% of the County's total unincorporated required units, both actions are critical to ensure production of affordable units. **We urge that the funding study be conducted immediately and not delayed until January 2026 as currently proposed in Program 5.**

We previously requested that Program 17 relating to tenant protection measures be strengthened. We appreciate that this has been addressed by your Board's adoption of the Just Cause Residential Eviction Ordinance in July.

One of our previous comments has not been incorporated into the Housing Element before you today, and we request that your Board direct staff to address it:

Clarify Workforce Housing Definition. In several programs, the term "workforce housing" is used to identify housing for those making 120-200% of AMI. While we recognize the need to support housing for the upper levels of our local workforce,

labeling this as “workforce housing” implies that lower income households are not a part of the critical local workforce. We request you find another way to reference this housing category.

With those important but simple changes, the League supports adoption of the County’s Housing Element.

Suggested Criteria for Selecting Rezone Sites

Following adoption of the Housing Element, your Board will ultimately determine which sites will be rezoned to meet the State Housing and Community Development Department’s requirement that you have sufficient sites to meet your Regional Housing Needs allocation. The League offers the following principles or criteria to guide the Board’s site selection for immediate development:

1. **Begin with County-owned and other publicly owned parcels.** The Board should select all of the County-owned sites and other publicly-owned sites to be developed as soon as possible. These sites should be used exclusively to meet the County’s significant very-low- to moderate-income unit requirements. We cannot afford to miss the opportunity these public sites provide to meet these requirements. We know that most privately-owned parcels will not generate significant amounts of affordable housing production. Only publicly-owned parcels can reliably produce projects with 100% deed-restricted affordable housing. Further, since they are owned by the public, they should be used for this type of significant public good.
2. For a similar reason, all **parcels owned by the faith community should be included** in the inventory. They provide the next best opportunity for very-low- to moderate-income housing production.
3. **Employer owned sites should also be included** in the inventory. These provide good opportunities for employers to provide housing for their workforce.
4. **Ensure Significant Affordable Housing if Agricultural Parcels are Rezoned.** Rezoning of agricultural land should only occur when significant amounts of affordable housing would result, and after first rezoning other lands in the urban area, especially publicly-owned sites. When that is done, factors to consider in the conversion of agricultural sites to affordable housing should include:
 - Location, with priority given to property in or near an urban area where services and amenities are available.
 - Quality of Agricultural land, with priority given to non-prime agricultural lands.
 - Use of the Parcel, with priority given to properties not in active agricultural use.
 - Use of Surrounding Parcels, with priority given to properties that do not abut agriculture to avoid further agriculture-urban conflicts.

5. Final site selection should consider spreading the new units for different income levels and different housing sizes and types across the unincorporated south coast to the extent feasible.

Finally, newly developed units should be available to people who live and work here. We request the Board include a requirement for preference to residents and workers on the south coast for all units created by the Housing Element rezones.

Thank you again for the opportunity to provide comments on this important plan.

Sincerely,

A handwritten signature in black ink that reads "Vicki Allen". The signature is fluid and cursive, with a horizontal line at the end.

Vicki Allen, Vice President, Communications
Leadership Team, LWVSB

A handwritten signature in blue ink that reads "Dianne M. Black". The signature is fluid and cursive, with a horizontal line at the end.

Dianne Black, Vice President
Leadership Team, LWVSB