



January 7, 2024

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

RE: Criteria for Rezoning for 2023-2031 Housing Element; Agenda Item D-4 January 9, 2024

Chair Williams, Members of the Board of Supervisors:

The League of Women Voters of Santa Barbara appreciates the opportunity to provide input on the criteria for rezoning sites to meet the inventory required by the State’s Housing and Community Development Department.

In our letter dated December 1, 2023, we offered criteria for your consideration. However, we did not emphasize that rezone **planning should focus exclusively on sites that are most likely to yield affordable units – which are units that are in the very low to moderate income range**. Even before any rezones are considered, the County has already exceeded the south county above moderate income target for the year 2031 by 322% with its pending projects, including Builders Remedy projects and ADUs. Given the potential for additional Builder’s Remedy projects until the State certifies the County’s Housing Element, this number is likely to grow. **Therefore, no rezoning is necessary to meet the above moderate (or market rate) housing required by the State.** The table below illustrates this:

**2023 Pending\* South Coast Housing Units  
 Compared to 6th Cycle (2023-31) RHNA and Buffer Planning Targets  
 1/7/2023**

Income Level	6th Cycle RHNA Target	Units Required To Meet 15% Buffer	Units Pending Approval (including ADUs & Builders Remedy)	Remaining Units (Deficit) Needed to Meet 15% Buffer	% of 6th Cycle Target Already Met with Pending Projects
Very Low/Low	1766	2030	957	1,073	54%
Moderate	1051	1208	354	854	34%
Above Moderate	1325	NA	4271	NA	322%

\* Units that have been submitted as part of a project, including ADU’s and Builder’s Remedy, but are not yet permitted.

Source: County of Santa Barbara, Rezoning [Balancing Act Tool](#) and 2023-31 Housing Element

Given this reality, it is vital that the County identifies sites that can be assured to produce a *significant* number of low- and moderate-income housing units. Otherwise, the County will simply be facilitating the development of market rate housing that will not be affordable for the majority of local workers and families.

The best way to ensure the production of affordable housing is to have existing control over the property it is built on. **We, therefore, urge the County to:**

- **Rezone every County-owned property** identified for rezoning and **ensure that every site is developed with 100% low to moderate-income housing.** The existing County-owned sites at the proposed densities only result in 235 units of affordable housing, and sites 17 and 18 include 37 and 12 above moderate units respectively. **Because land costs often prohibit non-profits and Housing Authority projects from penciling out, we strongly recommend that the County identify additional free, County, publicly-owned and faith community parcels that can accommodate 100% deed-restricted, below market-rate housing.** Similarly, we recommend that all of the employer-owned sites be included in the rezones IF that housing is provided to local residents and workers.
- **When agricultural parcels are rezoned, ensure that significant affordable housing would result.** Consider what programs will result in the assumptions in the balancing tool model (which the League believes overestimate the likely ratio of market rate to affordable units). Look for ways to encourage 100% deed-restricted moderate-income units for sale or rent on some sites.
- **All rezones should be in “the interest of general community welfare.”** In addition to affordability, in making the findings for rezones, we believe it is important that a variety of unit types that respond to the needs of the community be provided. To accommodate families, we recommend some larger three-bedroom units be provided. We also recommend both rental units and for sale units be provided through the rezones.

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, or will be provided.
- Quality of agricultural land, with priority given to non-prime lands.
- Use of the parcel, with priority given to properties not in agricultural use.
- Use of surrounding parcels, with priority given to properties that do not abut agricultural uses.

To assist in selecting among the potential agricultural sites, **your Board should encourage a hearing where each of the property owners can present their concept of development, including affordability targets.** This will give your Board and the public more information to assist in evaluating the rezone options.

We strongly request that the Board of Supervisors direct staff to study alternatives for a **permanent source of funding such as a bond or tax measure for affordable housing immediately**. We do not have several years to waste in providing the funding that is critical to development of deed-restricted affordable housing that is urgently needed now.

Lastly, as you work towards these rezones, please keep top of mind the **immediate need to establish a requirement for local preference** (those who live or work on the south coast), so that any housing resulting from the Housing Element will contribute to solving our local housing crisis, instead of counteracting it.

Thank you for the opportunity to comment on this important process.

Sincerely,



Vicki Allen, Vice President Communications  
Leadership Team, LWVSB



Dianne Black, Vice President  
Leadership Team, LWVSB