



March 17, 2024

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

RE: Board of Supervisors Workshop on Housing Element Rezone Sites March 19, 2024

Chair Lavagnino and Members of the Board,

The League of Women Voters of Santa Barbara thanks the Board for hearing our request and scheduling the workshop to hear from developers of potential rezone sites. We look forward to hearing about the plans for the sites that are being considered for rezoning.

The League continues to be concerned about the assumptions for affordability included in the Balancing Act Tool model. Most of the sites assume units will be provided in the following income levels: 50% lower, 25% moderate, and 25% above moderate. Neither the County nor the State have programs or a permanent source of funding in place to ensure this high level of affordability will result from rezones. The result of the rezones is much more likely to significantly overproduce at the above moderate, or market rate, level. Even without one rezone, the County is already 801 units over the target for market rate units. We encourage developers to seriously consider working with a Housing Authority or another non-profit housing provider to achieve a higher rate of affordability with their projects.

Beyond the problem that most Builder's Remedy projects have 80% market rate or above moderate units and only 20% are deed-restricted to be affordable at the low- and moderate-income level, the preliminary unit sizes of these projects also appear to be too small to align with the South County's diverse housing needs. For example, many families will need more than two bedrooms and one parking space and there may not be enough ADA compliant units for seniors and people with disabilities.

The League strongly recommends that the Board of Supervisors use County owned sites exclusively for affordable units at the lower to moderate income level. These properties are held by the County in trust to the public and should serve the public good. Two of the County-owned sites exacerbate this overproduction of market rate housing. Sites 15 and 16 include an assumption of 30 above moderate units and 12 above moderate units respectively. The for-profit housing market will ensure more than enough market rate housing.

The League also strongly recommends that the County investigate additional sites owned by the County and other public agencies to be used for affordable housing and is encouraged by the Workforce Housing Study underway. Given the likely low production of affordable housing from this initial rezoning effort, we fully expect that additional rezones will be necessary to maintain no net loss of sites to meet your RHNA allocations in the affordable categories. The County should accelerate the development timeline for affordable units and be positioned to address the need for additional sites without rezoning more land for market rate housing.

Thank you again for holding this workshop. We look forward to continuing our participation in the process as it moves forward.

Sincerely,

Vicki Allen, VP Communications

Handwritten signature of Vicki Allen in black ink.

Dianne Black, VP

Handwritten signature of Dianne M. Black in blue ink.