

July 25, 2022

Re: Comments on the Draft Housing Element, July 26, 2022

Dear Mayor Rowse and City Council Members,

The League of Women Voters of Santa Barbara is pleased to have an opportunity to comment on the draft of the City’s Cycle 6 Housing Element Update (HEU). The new goals contained in the HEU and our comments below closely align with our LWVSB Housing Positions which we adopted in 2021 after a year of study. Our current priorities are to 1) Support efforts to preserve and significantly increase low and moderate income housing supply for all ages, family size and disabilities, 2) Support prioritizing local residents and workers for new housing units and 3) Support policies that increase housing security for all, especially renters. We have also been asked by our national LWV office to view everything we do through a Diversity, Equity and Inclusion lens.

Based on the level of agreement we observed at the Planning Commission’s HEU review we are optimistic that the update can address the City’s dire affordable housing crisis with meaningful actions. The bullet comments below were informed and expanded by communicating with leaders of other organizations who care about housing. All of us are committed to helping the City of Santa Barbara provide a foundation for a more sustainable and equitable community. Specifically, we support the following changes and comments on the City’s HEU Draft:

* **We need to hear more from the less housing secure residents and workers.** In a city with few vacancies and 59% renters there are thousands of residents without housing security. The efforts to reach them during the HEU process have fallen short. We encourage the City to step up its efforts to reach out to this large segment of the community to hear their concerns and attempt to meet their needs.
* **We request that the ‘Quantified Objectives’ be revised upward to show a commitment to Capital A Deed Restricted Affordable Housing and confidence in the proposed programs in the HEU plan.**

The City’s Cycle 6 RHNA (Regional Housing Needs Allocation) target from the state is 4969 units for the very low, low and moderate income households. The Quantifiable Objectives (QO) “target goal” for the same affordability levels is just 859. We understand that goals may not be achieved because of environmental, financial and other constraints but we should make a meaningful effort to increase very low to moderate income housing units and the RHNA numbers are based on appropriate data which define actual needs. The status quo is unacceptable.

* **The reliance on ADUs (Accessory Dwelling Units, aka ‘Granny Flats’) to meet the majority of very low and low income units in the City of Santa Barbara is overly optimistic.** In order to count towards the lower income RHNA targets, ADUs should have a restricted deed or enforcement mechanism that can be monitored.
* **Policies 1.7 and 2.1: Clarify the meaning of ‘Community Benefit’ and consider replacing it with ‘Affordable Housing Benefit’.** Whatever the term, it needs to be clear that the ONLY way to be eligible for the maximum local incentives such as taller buildings or use of publicly owned land is with a high percent of affordable units of the total built.
* **HE-2 (Goal 1): La Cumbre Plaza Specific Plan** needs a creative vision and a chance to leverage that site for a significant amount of affordable housing. This should occur with a robust community input visioning process that includes workers and renters who are the most impacted by escalating rents. Stakeholders could explore feasibility of low and moderate workforce housing projects and new innovative models of housing developments (HE-6, Goal 1) such as co-housing for purchase developments or limited equity cooperatives for all incomes and family types.
* **HE-7 (Goal 1 and 2): “Affordable Housing Overlay” and HE-8 “Inclusionary Housing Evaluation” programs** are place holders. We would like to see a timeline and commitment to actions that examine different solutions to incentivize production for the low and moderate income levels.
* **HE-25 (Goal 8) We recommend a completion target of the end of 2023 for the program study** “to secure permanent source(s) of funding for affordable housing and renter protections.”
* Finally, we request that a **Glossary of Terms** be included at the end and throughout the HEU document to aid in the understanding and intention of the policies and programs that use them. In particular, the public should know the meaning of the following when used for City purposes: ”Middle Income,” “Above Moderate Income,” “Upper Middle Income,” “Workforce,” ”Downtown Workforce,” and “Community Benefit.”

We also support the following short-term actions where an urgent response is required to help our population that does not have housing security.

* **We need an emergency ordinance for Rent Stabilization**. We need rent stabilization to strengthen the necessary tenant protections to support renters from displacement that can come from increased housing development in our City. As part of that ordinance we hope the City can get started on the Rental Registry for new buildings as suggested by the Planning Commission.
* **We need the City to commit to a short-term funding source** that can be used to leverage other monies to fund the Housing Authority’s production and tenant protections such as a right to counsel as recommended in program HE-25 while we wait for progress on Goal 8 Funding Options.
* **A few City-owned parking lots should be identified as “Suitable Sites” for affordable housing** so HACSB and non-profit developers can start planning and evaluating project possibilities.

Thank you for your attention. We look forward to working with you and others to have a future Santa Barbara that can accommodate a diverse population with increased housing stability.

Sincerely,



Vicki Allen, League of Women Voters of Santa Barbara VP Communications