



July 26, 2023

Garrett Wong, Climate Program Manager
Sustainability Division
Community Services Department
County of Santa Barbara

RE: League of Women Voters of Santa Barbara Comments on the Draft Climate Action

Dear Mr. Wong,

On behalf of the League of Women Voters of Santa Barbara (LWVSB), we thank you for this opportunity to provide input on the draft 2023 Climate Action Plan (CAP). Established in 1938, the LWVSB is a non-partisan, non-profit organization that strives to educate the electorate and participates in the deliberation of important policy issues on the South Coast.

Towards that end, the LWVSB has a Housing Committee that is focused on encouraging policies that increase the supply of affordable housing, especially for very low to moderate income households, and to protect tenants. As you are aware, we have a Sustainable Communities Committee that monitors environmental issues, including land use decisions and their climate impact. We also have a Social Policy Committee that looks at issues related to poverty for the least advantaged in our community. Our comments below reflect the consensus of these committees, as well as our organization's overarching mandate to view all our work through a diversity, equity, and inclusion lens.

Main Issues

Equity: We applaud the plan's stated goal of ensuring equity and access. The plan mentions but should be more explicit about the critical need for County funding, especially subsidies and discounts for lower income residents, whose participation in CAP initiatives is critical to achieving the 2030 and 2045 climate targets. Low-income communities cannot afford to implement many of the climate-saving initiatives outlined, including purchasing electric vehicles and electrifying their homes, without significant government subsidies and discounts. In the end, encouraging equity is about allocating appropriate resources and making CAP accessibility a budget priority.

Affordable Housing: Since about half (49%) of the County's greenhouse gas (GHG) emissions emanate from on road transportation and vehicle miles traveled (VMTs), the plan should prioritize funding and building more deed-restricted affordable housing at the appropriate

income levels on the South Coast where the County's largest jobs-to-housing imbalance exists. Developing affordable housing on County-owned sites where free land can help facilitate the quick financing of housing projects with 100% deed-restricted affordable units should be prioritized. Simply relying on the County's implementation of the draft 2023-31 Housing Element (HE) is not enough. That plan is likely to yield significant amounts of market rate or above moderate-income housing but not enough affordable housing at low to moderate income levels. If climate targets are to be met, a dedicated funding source for affordable housing and a requirement to include a certain percentage of affordable housing in multi-family rental housing should be enacted as quickly as possible by the County. Where possible, preference for local workers should be required for new housing to reduce VMT.

Alternative Transportation: Achieving the CAP's targets is also dependent upon the effective implementation of the County's Connect 2050 and the Active Transportation Plan. Since building sufficient affordable housing on the South Coast will take time, increasing and improving transportation options from North County and Ventura County and beyond to the South Coast is a key, immediate strategy to reduce VMT. Not only should the County encourage a more robust, expansive, and frequent public transit system, but lower-income riders should be subsidized to increase their usage. Perhaps this can occur partially through alternative transportation plans for major employers on the South Coast. Again, this will require the County prioritizing the allocation of funding for an expanded transit system and discounted rides. We do not believe that an emphasis on increasing private EV ownership alone is a viable or equitable strategy for reducing VMTs, given the significant cost barriers for lower-income populations.

Specific Comments

Below are just a few page-by-page comments in chronological order of the CAP that illustrate more specifically the nature of our main concerns.

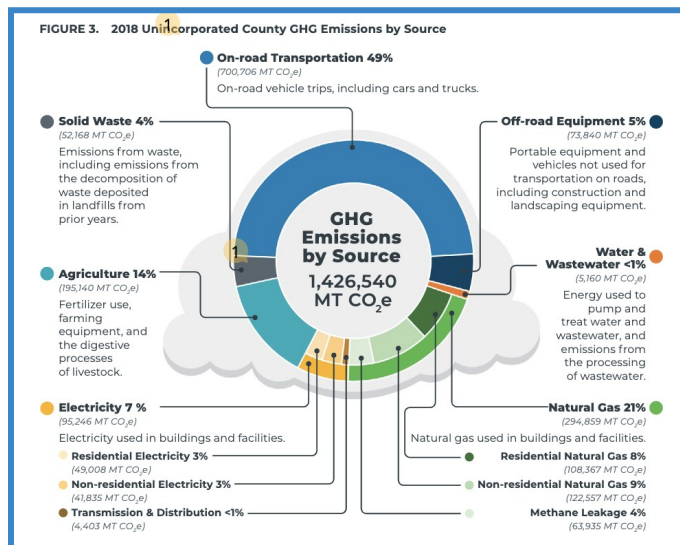
Page 10. We agree with the sentiment of the vision statements but suggest the following changes—

- Add the following underlined section to the first sentence after “Address Equity” to: “Address Equity through increasing resources to low-income communities and communities of color, including more County funding for deed-restricted affordable housing and significant subsidies for zero-emissions vehicles, public transportation and the electric retrofitting of homes.”
- Replace the first sentence after “Increase Accessibility” with: “Increase Accessibility to safe and affordable housing that is in close proximity to jobs, schools, services, recreation and healthy foods through collaborative ventures and increased County funding.”

Page 12. The pie chart on that page clearly shows that the largest contributor to GHGs are road vehicles (see Figure 1 below). Forty-nine percent (49%) of the unincorporated County's GHGs are a result of cars and trucks. More details and data would illustrate how best to tackle this problem, such as when and where the most VMTs are generated. Demographics, such as the income levels and place of origin of commuters, would be important to know too. Specifically, how much of this situation is a result of lower-income workers versus

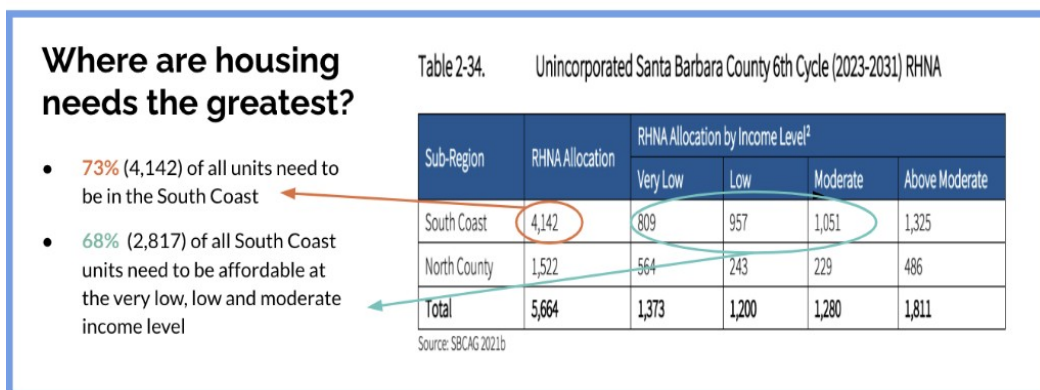
above moderate-income workers who are forced to live outside of the South Coast and commute in from the North Country and from counties south of Santa Barbara, such as Ventura County and even further?

Figure 1: Vehicles Trips are the County's Biggest GHG Source



As is well-documented, the jobs-to-housing imbalance is significant on the South Coast. This imbalance is a contributing factor to the South Coast being assigned 73% of all unincorporated County housing units by the Regional Housing Needs Allocation (RHNA) for the 6th Cycle (see Figure 2 below). The CAP should show data on specific South Coast government agencies (e.g., school districts) and industries (e.g., hospitality) that generate a demand for affordable housing given the income levels of their employees. This data should form the basis of partnerships with businesses and public agencies around actions and cost-sharing for the building of affordable housing and improving transportation options. The Santa Barbara Council of Governments (SBCAG) has new methods for conducting analyses of demographic commuter data through mobile phone data that could be included or cited in this section.

Figure 2: Unincorporated County Housing Needs by Income Level for 2023-31



Source: County of SB Housing Element Draft, 2023.

Pages 15-16. In light of vehicular travel being the largest contributor to GHGs, we agree with the CAP's identification of "Housing and Transportation" as a top focus area. We have general comments on the two main strategies outlined below:

- TR-1 "Increase passenger EV car ownership to 25% by 2030 and 90% by 2045."
Consistent with the plan's equity focus, we believe it is important to determine and track across different socio-economic levels who currently owns and who switches to electric vehicles and where EV owners/non-owners live. Specifically, how will the CAP monitor current EV ownership numbers by demographic profile and how will progress toward attaining these goals be measured by people's income levels and where they live? Presumably a significant percentage of the GHGs are a result of low-income workers who commute from the North County or Ventura County into the South Coast due to a lack of affordable housing. Since low-income communities are also less likely to afford EVs, time and attention must also focus on improving and subsidizing transit for those underserved communities.
- TR-2 "Increase affordable housing and mobility options." The County claims it will "decrease vehicle miles traveled by 14% by 2030 and 28% by 2045." Most of the detail on how this reduction will be accomplished focuses on increasing transportation strategies, such as carpools, bike use, and other modes of transportation. Very little is mentioned about affordable housing, except that the County is relying on the implementation of its HE. This section should identify specific programs in the HE that have the greatest likelihood of increasing deed-restricted affordable housing in the South Coast for moderate to very low-income households. One such strategy, for example, is enacting a requirement that a certain percentage of units in multi-family rental projects be deed-restricted affordable, which is currently required in for sale projects. This is also referred to as an inclusionary housing overlay (IHO) ordinance under Program 4 of the HE. The IHO requires 10% of units for moderate to very-low-income households and 5% for workforce households (up to 200% of AMI). The HE's underlying assumption is that 75% of the units built in rezoned sites will be affordable (i.e., 25% will be affordable for moderate income and 50% will be for low and very low-income earners). We don't think those are realistic affordability percentages for privately-owned and developed projects, where the IHO requirements are only 10% for affordable ownership units, and State Bonus Density requirements are only 20% affordable. Therefore, we believe another action the CAP should mention is funding and fast-tracking the building of 100% deed-restricted affordable housing projects on County-owned sites.

Page 20. We are pleased to see a discussion of RHNA in the second paragraph of the Housing and Transportation section, titled "What is the Big Shift?" However, simply citing the total housing units assigned by RHNA for the County or the South Coast masks and does not accurately reflect housing needs by socio-economic status. To be truly transparent about housing equity and needs, we recommend that the CAP disaggregate and report regional housing unit needs and percentages by regions and income levels.

For example, the CAP should clarify that 4,142 (73%) of the total 5,664 RHNA units assigned to the unincorporated County need to be built in the South Coast by the year 2031. Of those, 809 (20%) units should be targeted for very low-income households, 957(23%) for low income

households, and 1,051 (25%) should be at the moderate-income level (see Figure 2). Said another way, most of the housing - nearly 70% - that should be built in unincorporated areas of the South Coast should be deed-restricted affordable housing at moderate to very low-income levels. Only 30% needs to be new market rate or above moderate-income housing. SBCAG has all this countywide RHNA data readily available by income level and region that the CAP should include.

Pages 22-23. Under the CAP sections titled, “Measure TR-2: Increase Affordable Housing and Mobility Options,” are specific “Actions” to meet ambitious lowered GHG targets in 2030 and 2045. Only one out of the 12 strategies outlined, addresses affordable housing, TR-2.1. We recognize that the CAP’s primary affordable housing approach is to implement the County’s Housing Element. However, as we’ve explained above, the HE is unlikely to produce affordable housing at the lower income levels in the South Coast unless these three actions happen quickly: 1) a dedicated County funding source, such as a bond or tax initiative (Program 5 of the HE) is enacted, 2) an inclusionary housing provision for multi-family rental housing projects (Program 4 of the HE) is enacted, and 3) the development of 100% deed-restricted affordable housing projects on the 11 County-owned sites identified by the HE is accelerated. We recommend that these strategies be specifically cited as part of TR-2.1 or as separate CAP actions to be undertaken as part of TR-2.

Among the other 11 mobility strategies outlined, TR-2.7 on Transit Accessibility and Reliability appears to be among the most important from an equity perspective. That action states: “Partner with transit partners to increase transit service and provide subsidized or discounted transit passes for low-income commuters.” We could not agree more. Until more affordable housing is built, GHG goals will not be met without expanding and increasing the frequency of discounted transit in underserved North County, Ventura and Los Angeles County communities where many of our South Coast workers live. Most important is providing such transportation at low enough discounted rates to encourage participation. Again, that will require County funding.

Page 51. The timeline for implementing TR-2.1, on affordable housing strategies, should be shortened. The CAP currently states the timeframe for affordable housing infill and upzoning as 2025-2028. As explained above, enacting a dedicated County funding source for affordable housing, implementing an inclusionary affordable housing ordinance for rental projects, and developing County-owned sites, should be worked on right away, between 2023-2026. We recommend that such language and a timeline change be included in this section.

Thank you for the opportunity to comment on the Draft CAP. We look forward to participating in public hearings on this important project.

Respectfully yours,



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VP Communications, Leadership Team



Dianne Black, LWVSB
Board Member, Leadership Team