



SENT TO City of Santa Barbara Planning Commission via
Community Development PC Secretary pcsecretary@santabarbaraca.gov
Cc: Renee Brooke, Dan Gullet, Jessica Metzger, BAE Consultants

August 3, 2021

SUBJECT: August 5 Meeting on BAE Economic Feasibility Study Scope of Work and Housing Needs

Dear Chair Schwartz and Members of the Planning Commission,

The League of Women Voters Santa Barbara (LWVSB) looks forward to working with you, staff and the City Council to seize this moment to 'build back better'. Our new Housing Committee has voted to prioritize the planning of much needed low- and moderate-income housing and to examine how to ensure that affordable housing will go to LOCAL residents and workers. We are heartened by progress on both fronts as community leaders and elected officials at the County and State level are sharing ideas that don't depend on inclusionary policies to get affordability.

The feasibility study's scope of work is focused on economics - construction costs, current rents, developer profits - and how different building sizes determined by Floor Area Ratios (FARs) will affect the viability of producing more rental units. They have also been asked to look at how the City's Inclusionary and Density Bonus Ordinances and various incentives can help to increase the production of housing affordable to moderate and middle-income households. Those are the tasks you were given which should be helpful for producing the 3,032 above moderate units and a portion of the 1,441 moderate income units included in the RHNA (Regional Housing Needs Allocation) numbers for the 2023-2031 cycle.

What is not being addressed are the housing needs for the half of the City's population that does not have housing security. As we shared with the Council on Tuesday, we don't know where the other 5,000 more affordable units will go. The City of Santa Barbara has unique challenges and one is that even rents for smaller ADUs are very high. Our Housing Authority has a stellar record of providing excellent facilities for the very low- and low-income residents who are unable to work and/or require supportive services but finding appropriate locations is becoming more difficult.

The League strongly recommends accommodating a significant number of the very low-, low- and moderate-income residents (with RHNA targets of 2,147; 1,381 and 1,441 units respectively) in the downtown housing plans, prioritizing those who currently reside or work in that area. This action will help reverse the trends of younger workers and families being priced out of the market and fulfill goals to revitalize downtown and reduce greenhouse gasses with less reliance on cars and fewer commutes. Even if the inclusionary requirement is increased to 15% moderate income, it will not make a dent in what would be needed for our workforce.

Now that the updated RHNA numbers are final we look forward to the Housing Element update that will include, among other things, an inventory of suitable parcels for affordable housing. The community can

help identify which public land could be used for significant numbers of low and moderate housing with small units. One economic feasibility answer may be to combine different income categories with the higher income levels on the top floors.

Before those plans are clearer, we hope the Planning Commission and the BAE consultants will 'do no harm' which would make it more difficult to produce an adequate number of affordable units in the future. Examples of unhelpful policies would be offering significant developer incentives such as larger FARs or height increases for only a modest number of moderate units.

We believe that Santa Barbara can be a leader in finding affordable housing models that serve all incomes with innovative funding avenues. The best solutions probably involve more private and public partnerships and there may be different solutions for each income category and family type.

Thank you for your work on this important issue.

For further information contact Linda Honikman, Chair, LWVSB Housing Committee
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Sincerely,



Vijaya Jammalamadaka
President, LWVSB