

STAFF REPORT

SUBJECT: Regional Housing Needs

MEETING DATE: June 19, 2008

AGENDA ITEM: 9

STAFF CONTACT: Brian Bresolin, Michael G. Powers

RECOMMENDATION:

- A. Conduct public hearing to receive comments on draft Regional Housing Needs Allocation Plan and draft allocation methodology.
- B. Consider request for plan revision and either:
 1. Reject requests for modification, adopt Final Plan (including editorial corrections), and direct staff to prepare responses to local agencies requesting revisions, or,
 2. Direct Staff to modify the plan, in consultation with TPAC, and present final plan for adoption in July

SUMMARY:

At the SBCAG board hearing on March 20, the board approved a hybrid regional housing needs allocation scenario that emphasized existing jobs as the primary allocation criteria. The Board directed staff to prepare a draft plan for consideration. At your meeting on April 17 meeting the Board approved the draft plan which initiated a 60 day local agency and public review process. A public hearing is scheduled for the June 19 board meeting. Staff has received no formal public comments on the draft plan during the review period to date. However, the cities of Lompoc and Santa Maria have provided letters recommending approval of the draft plan and the City of Buellton indicated they reviewed the Plan. The County provided a detailed comment letter requesting the addition of a considerable amount of background information on the development of the Plan. As this report was being finalized the City of Santa Barbara submitted a letter requesting that the draft plan be revised to incorporate an allocation methodology that applies the formula based on 50% existing jobs, 25% new jobs and 25% new housing.

Member Agencies

Buellton ■ Carpinteria ■ Goleta ■ Guadalupe ■ Lompoc ■ Santa Barbara ■ Santa Maria ■ Solvang ■ Santa Barbara County

The Board will need to consider this request and provide direction to staff. Should the board deny the city's request and adopt the final plan, staff will need to prepare a response to the city's request. By statute, the final plan may be appealed by a local agency. Should an appeal be submitted, the board will have to consider it; therefore, adoption of the final plan is anticipated in the late fall of 2008 followed by submittal to the Department of Housing and Community Development (HCD). The plan will then be used by the local jurisdictions in their Housing Element update process. Local Housing Elements must be adopted August 31, 2009.

DISCUSSION:

At the SBCAG Board hearing on March 20 the board approved a hybrid regional housing needs allocation scenario that emphasized existing jobs as the primary allocation criteria. The scenario combined the TPAC recommendation (which allocated units using the formula 50% existing jobs, 25% each new jobs and new housing), the County staff "Housing the Workforce" Scenario (that was designed to reconcile disparities in jobs and housing), and additional reallocations between some jurisdictions. The following table shows the approved allocation.

SBCAG Approved Draft Regional Housing Needs Allocation

Housing Market Area/ Jurisdiction	Draft Allocation
South County Market Area	6,624
Carpinteria City	305
Santa Barbara City	4,388
Unincorp South County	291
Goleta City	1,641
Santa Ynez Market Area	570
Solvang City	170
Buellton City	279
Unincorp Santa Ynez Valley	122
Lompoc Market Area	800
Lompoc City	516
Unincorp Lompoc/VAFB	284
Santa Maria Market Area	3,607
Santa Maria City	3,199
Guadalupe City	88
Unincorp Santa Maria Valley	321
Unincorporated Total	1,017
County Total	11,600

The draft plan was distributed to local agency planning directors and members of the Technical Planning Advisory Committee and noticed to other interested individuals and agencies. A copy of the transmittal letter to local planning directors is contained in Attachment 1. The California

Department of Housing and Community Development were also provided a copy of the draft Plan. The draft Plan has also been available on the SBCAG website.

The City of Lompoc and the City of Santa Maria have provided letters endorsing the Draft RHNA Plan and the City of Buellton acknowledge their review of the Plan. These letters are all provided as an attachment.

Also attached is a comment letter submitted by the County of Santa Barbara, Planning and Development Department. The County comment letter suggests the draft plan narrative improve the description of the process that led to the final draft methodology by including a detailed accounting of the many deliberations in which the public, elected officials, staff from member jurisdictions, and SBCAG engaged in over the last year leading up to the Board's selection of the RHNA methodology. The letter also suggests the inclusion of additional detail documenting the role of the Regional Growth Forecast, and the context of the TPAC and Board meetings debating how future housing should be located in the region would greatly strengthen the narrative. While editorial changes recommended by the County can easily be incorporated into the final Plan, the comments on the plan that request additional materials on plan deliberations and the addition of background information to the plan run counter to the prior general direction from TPAC for a streamlined report. Therefore, staff does not concur with these wholesale changes. Staff can work with the County and TPAC in responding to the recommended changes.

As staff was finalizing this report, the City of Santa Barbara submitted a letter of comment that includes a request for a modification to the draft plan which would revise the housing allocation approved by the board. Their request is that SBCAG base its allocation solely on the formula 50% existing jobs and 25% each new jobs and new housing. Their request for RHNA revision is attached to this staff report.

The Board must consider the requests by the City of Santa Barbara and County of Santa Barbara and either: (1) Reject requests for modification, adopt the Final Plan, and direct staff to prepare responses to local agencies requesting revisions, or, (2) Direct Staff to modify the plan, in consultation with TPAC, and present final plan for adoption in July. If the board approves Option 1 and adopts the final plan, staff should be authorized to make editorial changes in consultation with TPAC prior to submitting the plan to the state. If the board elects to modify the plan based on requested revisions (Option 2), the board will need to provide direction to staff on the desired changes. The revised plan would be reviewed by TPAC and presented to the board for approval at its July meeting.

There have been no formal public comments on the draft plan during the 60-day comment period. Staff contacted the other cities and local agency representatives have indicated that their cities have no plans to submit formal letters of comment.

Schedule and Next Steps

Initially, SBCAG holds a hearing on the draft Plan to receive public and agency input. The formal action by a local agency challenging their allocation contained in the draft Plan is to submit a "request for revision" which, according to statute, must be based on "comparable data available for all affected jurisdictions and accepted planning methodology and supported by adequate documentation." SBCAG as applicable "may accept the proposed revision, modify its earlier determination, or indicate...why the proposed revision is inconsistent with the regional

housing need.” Staff would solicit board input on the requests for revision submitted by the County and the City of Santa Barbara.

If SBCAG does not accept the proposed revision, and adopts the final plan, SBCAG must provide a response to the local agency. By statute, local agencies may appeal the final plan. Local jurisdictions will have a 60 day period to appeal their allocation based on the criteria outlined in Government Code Section 65584.05. Generally, an appeal must show that the Council of Governments failed to adequately consider the information or methodology used in the allocation, or, that a significant unforeseen change in circumstances has occurred in the local jurisdiction that merits a revision of the information submitted. However, if an individual jurisdiction’s allocation is reduced; other jurisdictions would be subject to an increase since the total countywide allocation of 11,600 remains the same. To enable staff to respond to any appeal the operative deadline for submitting an appeal is August 4 to allow TPAC involvement in the preparation of the staff response. A public hearing to consider appeals would be scheduled for the August 21 SBCAG board meeting. SBCAG must respond with specific reasons for its action on the appeal. SBCAG then issues a Final allocation plan.

COMMITTEE REVIEW: None

ATTACHMENTS:

1. SBCAG RHNA transmittal letter to local agencies
2. RHNA endorsement letter from the City of Santa Maria
3. RHNA comment letter from the City of Buellton
4. RHNA endorsement letter from the City of Lompoc
5. RHNA comment letter from the County of Santa Barbara, Planning and Development Department
6. Request for RHNA revision by the City of Santa Barbara

Attachment 1
SBCAG RHNA transmittal letter to local agencies



· 260 North San Antonio Road, Suite B · Santa Barbara, CA · 93110
Phone: 805/961-8900 · Fax: 805/961-8901 · www.sbcag.org

April 21, 2008

COPY

Marc Bierdzinski
Planning Director
City of Buellton
PO Box 1819
Buellton, CA 93427

RE: Draft Regional Housing Needs Allocation Plan, Santa Barbara County, Public Review of Draft Plan

The attached Draft Regional Housing Needs Allocation (RHNA) Plan has been approved and authorized for release by the Santa Barbara County Association of Governments Board. While your agency has been an integral part of our Technical Planning Advisory Committee that assisted SBCAG in drafting the Plan, this is a formal opportunity for your jurisdiction to review the draft Plan. As you know, the primary objective of the Regional Housing Needs Allocation Plan is to set the housing needs targets that each city and county uses in its local Housing Element of the Comprehensive Plan. The legislation requires COG's to distribute total housing need as well as housing need by income categories.

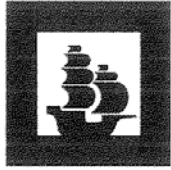
As the RHNA statute provides, local jurisdictions and the public have a period of 60-days to review the draft RHNA allocation methodology and Plan and submit comments. SBCAG will have a public hearing on the draft allocation methodology and draft Plan at its regularly scheduled meeting on June 19, 2008 and consider adoption of the final Plan. Comments received by June 6 will be incorporated in the staff report and distributed to our board in advance of the meeting.

Should you have any questions regarding the Draft Regional Housing Needs Allocation Plan, please don't hesitate to contact me or Michael Powers, SBCAG Deputy Director, at (805) 961-8900.

Sincerely,

Jim Kemp
Executive Director

Attachment 2
RHNA endorsement letter from the City of Santa Maria



JUN 04 2008

CITY OF SANTA MARIA
COMMUNITY DEVELOPMENT
DEPARTMENT

Santa Barbara County
Association of Governments

110 S. PINE STREET #101 (ON HERITAGE WALK) • SANTA MARIA, CALIFORNIA 93458-5082 • 805-925-0951 • TDD 925-4354

May 30, 2008

Michael G. Powers
Deputy Director
Santa Barbara County Association of Governments
260 N. San Antonio Road, Suite B
Santa Barbara, CA 93110

Subject: **Draft Regional Housing Needs Allocation (RHNA) Plan 2007-2014**

Dear Mr. Powers:


The City of Santa Maria has reviewed the Draft Regional Housing Needs Allocation (RHNA) Plan 2007-2014, dated April 17, 2008, and we recommend that the SBCAG Board adopt this Plan.

The SBCAG Board has deliberated this Plan at several public meetings, and has carefully considered the recommendations of SBCAG's Technical Advisory Committee. The City of Santa Maria is confident that adequate public input has been provided throughout the RHNA process, and we understand the importance of this Plan as the foundation of our respective Housing Elements.

The City of Santa Maria urges adoption of the Regional Housing Needs Allocation (RHNA) Plan 2007-2014, including the RHNA allocation numbers presented in Table 4 and Table 6 of that Plan.

Thank you for the opportunity to comment on this Plan. If you have any questions, feel free to contact me or Brian Smith at (805) 925-0951, ext. 244.

Sincerely,


LARRY LAVAGMINO
Mayor, City of Santa Maria

Attachment 3
RHNA comment letter from the City of Buellton



City of Buellton

RECEIVED

MAY 14 2008

May 13, 2008

Santa Barbara County
Association of Governments

Jim Kemp, Executive Director
Santa Barbara County Association of Governments
260 North San Antonio Road, Suite B
Santa Barbara, CA 93110

RE: Draft Regional Housing Needs Allocation (RHNA) Plan
City of Buellton Comments

Dear Mr. Kemp,

At its May 8, 2008, meeting, the Buellton City Council reviewed the April 17, 2008, Draft RHNA document. The City of Buellton has no comments on the plan at this time. However, we reserve the right to comment on the document at a later date if changes occur to the document that affect the City of Buellton.

The City Council would like to thank the SBCAG Board, SBCAG staff, and the members of TPAC for the many meetings and hours that went into preparing the document.

If you have any questions, please feel free to contact me at 686-0137.

Sincerely,


Steven L. Thompson
City Manager

Cc: Marc Bierdzinski

Attachment 4
RHNA endorsement letter from the City of Lompoc



June 4, 2008

Jim Kemp, Executive Director
Santa Barbara County Association of Governments (SBCAG)
260 North San Antonio Road, Suite B
Santa Barbara CA 93110

Re: Draft Regional Housing Needs Allocation Plan for Santa Barbara County

Dear Mr. Kemp:

On June 3, 2008, the City of Lompoc City Council reviewed the Draft Regional Housing Needs Allocation Plan for Santa Barbara County. The City Council found the draft Plan to be acceptable and endorsed its use for Santa Barbara County.

The City is aware that appeals of the draft Plan may be forthcoming. City staff will continue to work with SBCAG staff to monitor any appeals. Should revisions to the Plan be proposed which are unacceptable to the City, the City may withdraw its endorsement of the Plan.

Thank you for the opportunity to review the draft Plan. If you have any questions, please contact Lucille Breese, Planning Manager, at 875-8273.

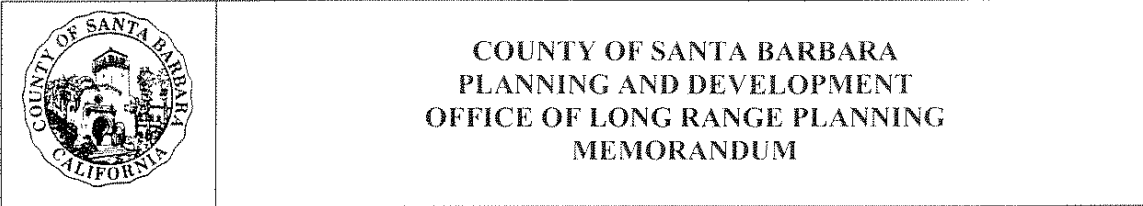
Sincerely,

Gary P. Keefe
City Administrator

C: Planning Division

Attachment 5

RHNA comment letter County of Santa Barbara, Planning and Development Department



Date: June 5, 2008

To: Michael Powers, Deputy Director of Planning, SBCAG
Brian Bresolin, Senior Regional Analyst, SBCAG

From: David Matson, Deputy Director

Subject: Revised Draft RHNA Plan 2007-2014 (April 17, 2008 draft)

Per your April 21, 2008 email request, County staff has reviewed and provided comments for inclusion in the Draft Regional Housing Needs Allocation (RHNA) Plan 2007-2014, dated April 17, 2008. It is our hope that you will find the following comments, in addition to our April 4, 2008 memo helpful as you prepare the final draft of the Plan. The RHNA methodology adopted by the Board was crafted during an open and public process consistent with the intent of state housing law. These revisions will serve to strengthen and accurately convey the comprehensive and integral role SBCAG has played in the State's RHNA process.

The Draft Plan narrative describing the process of developing the methodology can be improved by including a detailed accounting of the many deliberations in which the public, elected officials, staff from member jurisdictions, and SBCAG engaged in over the last year leading up to the Board's selection of the RHNA methodology. In particular, revising the narrative to describe the SBCAG Board's direction to the Technical Planning Advisory Committee (TPAC) to find a compromise methodology ensuring that future housing would be allocated to areas with the most job growth will clarify and reinforce the basis for the allocation. The inclusion of additional detail documenting the role of the Regional Growth Forecast, the role of the TPAC in developing a draft RHNA methodology, and the context of the TPAC and Board meetings debating how future housing should be located in the region would greatly strengthen the narrative.

Throughout this process, the County maintained the principled argument that jurisdictions should plan sufficient housing for their workforce so other jurisdictions would not have to shoulder the burden. The Draft Plan should also reflect the spirit behind the methodology to consider the factors as outlined in Government Code (GC) §65584.04(d). The importance of these factors as the foundation of the deliberations, and ultimately, the final RHNA methodology selected by the Board should be documented and discussed in detail.

RHNA Presentation to County Planning Commission

County staff provided a presentation on the outcome of the 2008 RHNA planning process to the Santa Barbara County Planning Commission at its April 23, 2008 meeting. The presentation provided an opportunity to inform the Commission about SBCAG and TPACs public process and describe the state RHNA requirements to address existing jobs-housing imbalances and promote infill by allocating housing where there is a need. The discussion at the Commission also focused on the role RHNA has in addressing existing regional imbalances by placing housing near job centers and preserving the regional quality of life by minimizing regional commuting, traffic, and air quality impacts related to future housing.

General and Specific Comments

All staff comments and requested edits are organized according to the sections outlined in the Table of Contents of the Draft Plan. The revisions recommended in the following sections are submitted in an effort to enhance the Draft Plan narratives detailing the State's RHNA requirements and the historic activities that ultimately led to adoption of the RHNA methodology by the Board.

2008 Membership Roster Santa Barbara County Association of Governments

"Supervisors" should read, *Santa Barbara County Board of Supervisors*

Section 1 – Introduction

General Comments:

1. Page 1, recommended first paragraph:

- As stated in our April 4, 2008 "Comments and Suggested Edits for Draft RHNA Plan" memo we recommend that you include an introductory paragraph that summarizes the purpose of the Plan. The introductory paragraph should include discussion of the following:
 - Initiation of the RHNA process which involved the adoption of the Regional Growth Forecast (RGF) 2007 by the SBCAG Board pursuant to Government Code;
 - The assignment of the Technical Planning Advisory Committee (TPAC) by the SBCAG Board to develop recommendations regarding the "fair share" methodology used to distribute the RHNA among the SBCAG member jurisdictions at least one year prior to the scheduled housing element revision pursuant to the requirements of GC §§65584, 65584.04, and 65584.01;
 - Final consideration of the methodology and release of the RHNA plan by the SBCAG Board for the statutory 60-day public review and comment period; and
 - The ultimate use of the RHNA Plan by member jurisdictions as they prepare their General Plan Housing Elements and identify zoning capacity and adequate sites for housing in each community for households with incomes at all economic levels.

While the citation of GC §65580 is helpful, however, since the requirements are highly specific, the current text may be confusing to a reader. Instead of paraphrasing, we recommend replacing the text with exact quotations. For example, the third and fourth bullets summarize requirements that occur in State law, but are not a part of the legislature's declaration of the State housing goal in GC §65580. We have included the full citation of GC §65580 for your use.

- Government Code §65580 reads:
 - (a) The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farm workers, is a priority of the highest order.
 - (b) The early attainment of this goal requires the cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians of all economic levels.
 - (c) The provision of housing affordable to low and moderate-income households requires the cooperation of all levels of government.
 - (d) Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for the housing needs of all economic segments of the community.
 - (e) The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the state in addressing regional housing needs.

2. Page 2, second paragraph:

- The correct citation for this paragraph is GC §65585.04(d)2(B) which discusses removing governmental barriers not "breaking down" development barriers.

Section 2 - Countywide Estimate of Regional Housing Needs

General Comments:

4. Page 5, Table 3, RHNA Development Schedule, 2007-2008:

- Please include adoption and submission of RGF by SBCAG Board for use by Department of Finance and State HCD in determining RHNA.
- Consider revision to the deadline for submission of RHNA Plan to HCD. The statutory deadline for the RHNA plan is August 31, 2008. Any submission past this date puts local jurisdiction's Housing Elements in statutory jeopardy.
- Staff recommends revising the Local Agencies column to include the dates associated with statutory deadlines for filing a request for revision by local agencies to the SBCAG Board and ultimately the deadline to file an appeal.
- To clarify the activity, the October 17, 2007 SBCAG Board item could be revised to read, "*Board holds hearing to consider final RHNA Plan for submission to State Housing and Community Development Department for review.*"

Section 3 – Geography

Specific Suggested Edits:

5. Page 6, South Coast Housing Market Area description, revise to include:

- *Unincorporated Carpinteria, Montecito, Summerland, Toro Canyon, Mission Canyon, the Eastern Goleta Valley, Isla Vista, Hope Ranch, and Gaviota.*

General Comments:

6. Page 7, Santa Barbara County Housing Market Areas Map:

- Please revise map to be consistent with the page 6 community names.

Section 4 – State Allocation Criteria

General Comments:

County staff suggests that a specific discussion or matrix be inserted that illustrates where in the document and how each component of State law, including GC §65584(d) and GC §65584.04(d), is adequately addressed.

Specific Suggested Edits:

7. Page 8, first paragraph, third sentence:

- The sentence appears to contradict the sentence below it. Revise the sentence to clarify that State law defines the factors in GC §65584.04 (d) that must be considered by the Council of Governments, not how these factors are to be weighted or applied when developing the RHNA Plan.
- Third paragraph: **Existing and projected jobs-housing relationship:** Please provide the title and date of the prior SBCAG study referenced in this paragraph and include a bibliography of all references in the back of the Plan.
- Fourth paragraph: **Local Agency opportunities and constraints:**
 - Please provide the date of the referenced RGF and include it and the Attorney General Opinion in the bibliography discussed in the second bullet above.
 - The reference to GC §65584.06 should be revised, and may be necessary because GC §65584.06 (a) only applies to “cities and counties without a council of governments.” A more accurate citation would be GC §65584.04(d)(2)(B) which states, “A council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for residential development under alternative zoning ordinances and land use restrictions.”
 - Please cite the section of state housing law referencing the prohibition against the distribution of RHNA based on growth control measures and resource and infrastructure constraints.

8. Page 9, Special Housing Needs:

- The discussion of Special Housing Needs appears to take the place of the Housing Needs for Farmworkers factor referenced on page 8.
- The discussion correctly describes that special housing needs are addressed in the General Plan Housing Element. This section should be made stronger by revising it to include a discussion of the data in the RGF about farm sector employment.

9. Page 9, Housing Needs Generated by UC Campus within a Jurisdiction:

- Please revise to read “*The current adopted UCSB Long Range Development Plan,*” rather than characterizing the document as “somewhat dated.” Since a draft of the revised plan has been made available to the public, a summary of how the statutory deadlines to release the RHNA Plan preempt consideration of the LRDP in the RHNA Plan for this cycle. A summary of the housing program being proposed in the draft

LRDP should be briefly discussed, but it could be noted the plan is in draft form and revisions are likely.

Section 5 – Method of Allocating Regional Housing Needs to Local Jurisdictions

General Comments:

- Please add subsection titles to organize the discussion and call out involvement of the public and the TPAC and the Board proceedings separately. This very important narrative is the core of this document and describes the deliberations and time the public, staff, and elected officials spent engaged in an open and public process to derive the methodology used to distribute the RHNA in accordance with State housing law.

10. Page 10, first paragraph:

- Please revise the paragraph to remove the reference “the legislation” and cite GC §65584.04(c) which requires public participation in the development of the RHNA methodology.

Specific Edits:

11. Page 10, fourth paragraph:

- Third sentence cites “representatives from most areas.” However, we believe you intended to refer to members of the public and representatives from interest groups. Please clarify, since the sentence as worded implies these “representatives” could be staff, or appointed, or elected representatives being cited.

12. Page 11, second paragraph, first sentence:

- This paragraph should have a subsection title: *TPAC Meetings*
- Please clarify who the participants are: The members of the TPAC, or the public, or both.
- As described in the introduction to our comments, expand this discussion to include the deliberations regarding locating housing in areas with the most projected job growth and the use of the jobs-housing ratio to inform these discussions. During both the TPAC and SBCAG Board meetings, the emphasis was on the importance of sound planning principles. The TPAC deliberations centered on how best to plan responsibly for future growth and how best to accommodate the housing demand associated with that growth.

13. Page 11, third paragraph,

- This paragraph should have a subsection title: *SBCAG Board Deliberations*.
- Revise this discussion to include the Board’s direction to the TPAC to find a compromise methodology based on these widely accepted and state mandated planning principles. Revise the text to detail the discussion at the TPAC regarding redevelopment within existing aging and dilapidated communities, infill, mixed-use, adaptive re-use, and transit-oriented development. We also recommend including a discussion of responsible planning for future development, a concept that formed the foundation of the Board’s deliberations as reflected in the final RHNA methodology selected.

General Comments:

- After Table 4, summarizing the methodology distributing the RHNA, additional context for the distribution would be of help in understanding the effect of the RHNA on each HMA and jurisdiction.

Specific Suggested Edits:

- We recommend inserting a table combining the RHNA from the previous housing policy cycle with the allocation approved by the SBCAG Board on March 20, 2008. The addition of this information will help demonstrate the parity between the allocations among jurisdictions over time. We have prepared a summary table for your use and included it as Attachment A to this memo. An electronic copy of the table can also be provided upon request.

Section 6 – Allocation by Income Level

14. Page 17, Paragraph 1, and Figures 4 and 5

General Comments:

- County staff is not clear why buildout is being used as a comparative measure in this section. Buildout is derived using existing zoning from each jurisdiction. As pointed out on page 8 of the Draft Plan, and in our recommended edit number 6 above, GC §65584.04(d)(2)(B) states, "A council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for residential development under alternative zoning ordinances and land use restrictions."

Specific Suggested Edits:

- The paragraph that describes Figures 4 and 5 should clarify that buildout includes total theoretical residential development based strictly on existing zoning. Including this as a factor is confusing, since GC §65585.04(d)(2)(B) prohibits zoning to be considered a limiting factor in determining the allocation. Additionally, buildout is not a factor discussed in the allocation criteria discussion on pages 8-9 of the Draft Plan.
- The purpose of housing law is to remove government barriers to the provision of housing. The buildout of land zoned for residential use is not a factor in the RHNA. Therefore, it is not clear why it is included in the Draft Plan, as it does not comport with State law and may not be appropriate. We recommend removing figures 4 and 5, or revising them to show theoretical buildout of all urban land in each jurisdiction including commercial and residential, since zoning can be changed to accommodate RHNA.

Regional Housing Policy Challenges

General Comments:

15. Page 20, section "Where Should We Grow and How Can We Afford it?"

- This section mentions Williamson Act contracts but does not describe their relationship to the 1964 California Land Conservation Act and the state goal of protecting prime farmland.

Specific Edits

16. Fourth sentence:

- This discussion offers only two choices for future development: “grow up with higher densities or spread out with a lower-density development pattern.” Please consider revising this discussion to include other viable development options consistent with State law and available to jurisdictions; including “*infill, mixed-use, adaptive re-use, transit oriented development, and redevelopment within existing aging and dilapidated communities.*”

All Revised Draft Sections

- All dates referenced should include the year.

Section 10 – Attachments

General Comments:

17. Attachment E, Transfer of Units Between Jurisdictions:

- Attachment E is not referenced anywhere in the revised Plan. Consider including Attachment E as revised text after annexation discussion on page 18.
- The Attachment E discussion should also include GC §65584.07(a), which also describes transfer of RHNA units between City and County outside of incorporation.
- Attachment I is identical to paragraphs one through four on page 10. Consider consolidation or removal of redundant information.

Concluding Remarks

Going forward, County staff remains willing to peer-review future revisions of the Draft Plan prior to release in order to ensure that the upcoming Final Regional Housing Needs Plan accurately reflects both the requirements of State housing law and the rationale behind the SBCAG Board's allocation methodology.

Please do not hesitate to contact me with questions at 568-2068.

Attachment A

Table 1: Comparison of Aggregate Allocations Over Last Two Planning Periods			
	2002 RHNA	2008 RHNA	Combined RHNA Distribution 2002-2008
South Coast	5,978	6,624	12,602
Carpinteria	75	305	380
Santa Barbara	2,333	4,387	6,720
Goleta	2,388	1,641	4,029
Uninc. Area	1,182	291	1,473
Santa Maria Area	7,934	3,607	11,541
Santa Maria	4,837	3,199	8,036
Guadalupe	83	87	170
Uninc. Area	3,014	321	3,335
Lompoc Area	2,012	800	2,812
Lompoc	890	516	1,406
Uninc. Area	1,122	284	1,406
Santa Ynez Area	1,585	569	2,154
Solvang	325	170	495
Buellton	536	278	814
Uninc. Area	724	121	845
Cuyama Uninc.	22	0 ¹	22
Uninc. Total	6,064	1,017	7,081
Total	17,531	11,600	29,131

Notes: 1: Cuyama unincorporated area counted as part of Santa Maria Unincorporated Area in 2006 RHNA.

Attachment 6
Request for RHNA revision by the City of Santa Barbara



City of Santa Barbara
Office of the Mayor

mblum@santabarbaraca.gov

www.SantaBarbaraCA.gov

June 11, 2008

SBCAG Board of Directors
Supervisor Brooks Firestone, SBCAG Chair
260 North San Antonio Road, Suite B
Santa Barbara, CA 93110

Marty Blum
Mayor

City Hall
735 Anacapa Street
Santa Barbara, CA
93101-1990

Mailing Address:
P. O. Box 1990
Santa Barbara, CA
93102-1990

Tel: 805-564-5321
Fax: 805-564-5475

RE: **REGIONAL HOUSING NEEDS** – June 19, 2008

Dear Supervisor Firestone:

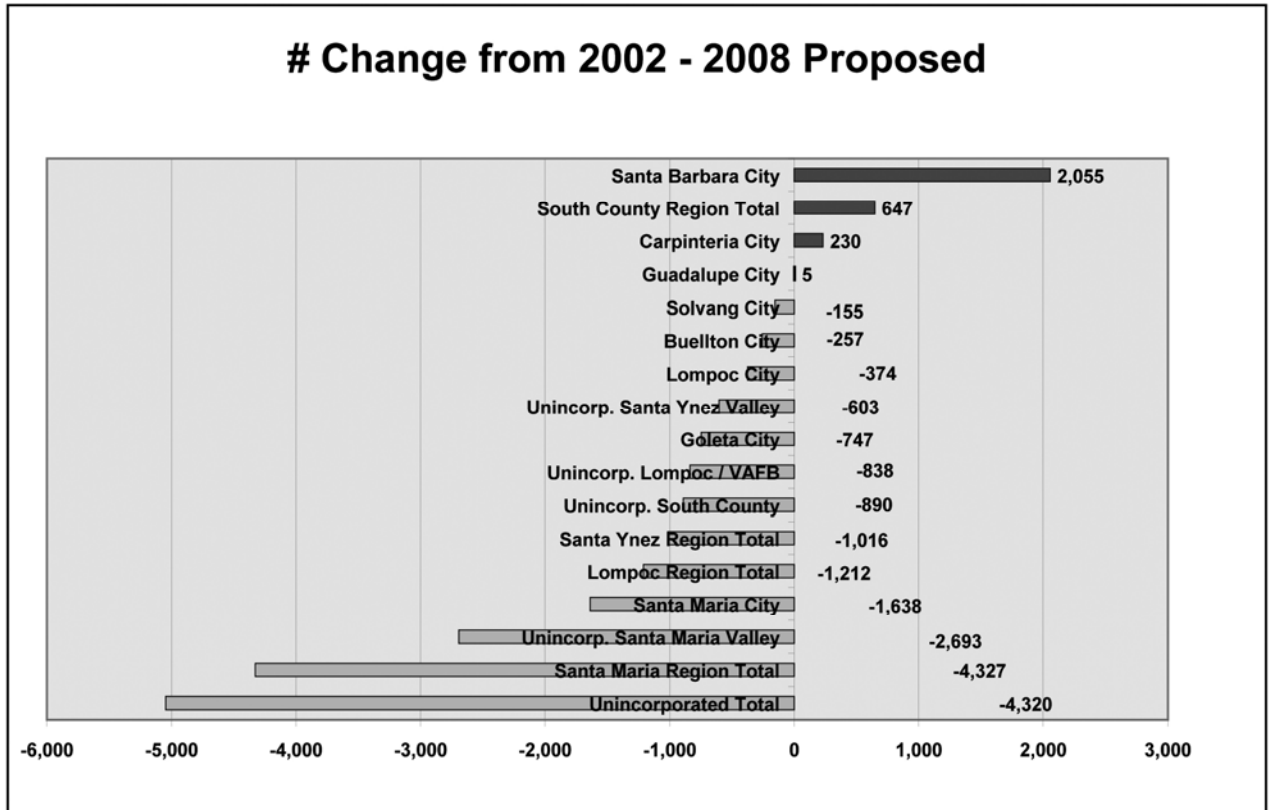
Background: On November 13, 2007 the final Santa Barbara County Regional Housing Need Allocation (RHNA) was received from the State Department of Housing and Community Development (HCD). That allocation was 34% lower than the allocation received for the prior (2001 – 2007) planning period. SBCAG Board directed SBCAG Staff to work with the Technical Planning Advisory Committee (TPAC) to prepare a Draft RHNA methodology and plan.

On June 19, 2008, the Santa Barbara County Association of Governments (SBCAG) will be considering public comments and final adoption of the Regional Housing Need Allocation Plan for the 2007- 2014 planning period. The City of Santa Barbara respectfully requests that the RHNA Plan be revised to:

Adopt a RHNA plan that uses the TPAC recommendation allocating units based on 50% existing jobs, 25% future jobs and 25% future housing scenario (Table 4, column 1, page 13 of the Draft Plan).

As proposed, the Draft Plan is unfair as it places an undue burden on the City of Santa Barbara. The City has a 30-year track record of Affordable Housing production resulting in 11% of the City's housing stock being subject to long-term rent or price restrictions for low and moderate income households. The City supports a fair distribution and regional solutions as recommended by TPAC. The Draft Plan does neither. The Draft Plan significantly reduces the RHNA from the previous cycle for all jurisdictions except for the cities of Santa Barbara, Carpinteria and Guadalupe. The changes in the allocation from the previous planning cycle by jurisdiction are illustrated in Figure 1.

Figure 1



The Draft Plan Proposes Inequitable Distribution: Our strongest objection involves the inequitable distribution of the proposed allocation within the South County Market Area: 96% to the three cities and only 4% to the County unincorporated areas. This distribution does not reflect the reality that the South Coast functions as one region and it flies in the face of regional cooperation to solve regional issues. The proposed distribution reflects a flawed “Housing the Workforce” analysis as illustrated as Step 2 on page 12 of the RHNA Plan. Pages 38 – 42 of the Plan detail the assumptions of “Housing the Workforce.” This flawed analysis finds that the unincorporated areas have a surplus of housing and need no additional units to accommodate the unincorporated area workforce housing needs. The unincorporated South Coast includes employers such as UCSB, Westmont, the Biltmore and San Ysidro hotels, Raytheon, Citrix Online, the County Office of Education and the County Government facilities along Calle Real. Moreover, the County of Santa Barbara, also a large employer with regional impacts, has offices both in the unincorporated South Coast and in Santa Barbara City. Based on the assumptions in the Draft Plan, Santa Barbara City is being asked to absorb this demand as well.

The Draft Plan Results From Flawed Analysis: On the South Coast, it is unreasonable to assume that all the service and construction workers flowing into Montecito and Hope Ranch daily must also live in Montecito and Hope Ranch. It is also unreasonable to expect that all the physicians and health care professionals who work in and around Cottage Hospital only live in the City of Santa Barbara. And it is quite unreasonable to expect that every employee who works for the County of Santa Barbara in Downtown Santa Barbara be required to live in the City of Santa Barbara. Yet the “Housing the Workforce” analysis makes exactly these assumptions by assuming housing needs only by individual political jurisdiction rather than by housing market area or region. Page 13, Table 4 column 2 shows this scenario with zero housing units needed to house workers in the urbanized County unincorporated areas of the South Coast.

To analyze and draw conclusions regarding a jobs/housing balance by governmental jurisdiction rather than by region flies in the face of sound reasoning and logic. The South Coast of Santa Barbara County is a single region with respect to housing, transportation and employment. The region’s housing, transportation and land use policies should reflect that regional reality and not try to artificially follow political boundaries that reflect politics and not function.

The City of Santa Barbara will support any analysis that looks at the South Coast as one region, addresses housing needs as a region and makes regional plans that reflect this. But the Draft Plan does none of those.

The Draft Plan is Growth Inducing for the City: As proposed, the Draft RHNA Plan is more growth-inducing to Santa Barbara than the State mandate. It would require an increase in Zoning and General Plan capacities for new housing over what is currently in place. What is proposed in the Draft Plan is well beyond the City’s current General Plan buildout estimate and it is not certain whether the City has the resource capacity as required to accommodate these additional units. Currently, the City’s Land Use Element and key resource studies, such as the Long Term Water Supply Program, plan for a buildout significantly less than what the Draft Plan proposes. Figure 4 on Page 17 of the Draft Plan dramatically shows that every jurisdiction in the County has the Zoning capacity to accommodate more units than proposed except for the City of Santa Barbara. Yet the Draft Plan targets the City with the greatest share of the countywide allocation!

By ignoring the existing capacities for new housing in existing Housing Elements, the Draft Plan would result in expanding the capacity for new housing in the City and thus resulting in a countywide expansion beyond what has been assigned to the County. Given that the SBCAG Board appealed the original higher State allocation, a Draft Plan that mandates an increase in countywide capacity is inconsistent with the earlier Board action. It is certainly inconsistent with the widely held expectation that the considerably reduced countywide State allocation would result in lower allocations for all jurisdictions within the County.

Request: The City of Santa Barbara respectfully requests that the SBCAG Board revise the Draft Plan to reflect past, present and future housing needs as recommended by TPAC. We strongly urge the Board to reflect a regional solution to our common obligation and to determine an allocation scenario based on the premise of each jurisdiction accepting a fair share.

To make the Draft Plan more technically sound, legally defensible and regionally fair, the City recommends that the SBCAG Board:

Adopt a RHNA plan that uses SBCAG's TPAC recommendation allocating units based on 50% existing jobs, 25% future jobs and 25% future housing scenario (Table 4, column 1, page 13 of Draft Plan).

Although we feel that this continues to place too much emphasis on jobs over housing needs, we could accept this shift in RHNA methodology. We would look forward to updating our regional land use and transportation policies to be consistent with this new policy emphasis.

City representatives will be available to discuss this issue further on June 19, 2008 and to answer any questions you may have.

Sincerely,

A handwritten signature in cursive script that reads "Marty Blum".

Marty Blum
Mayor