

PATTERSON AREA NEIGHBORHOODS ASSOCIATION
534 San Blas Place, Santa Barbara, CA 93111

October 13, 2003

County of Santa Barbara Planning & Development Department

RE: Comments on the draft Housing Element

The Patterson Avenue Neighborhoods Association appreciates the opportunity to respond to the County of Santa Barbara's August 2003 Housing Element Update. PANA provided comments following the June draft and we are gratified to see that those regarding neighborhood compatibility have been incorporated into this current draft.

However, after careful review of the current version of the housing element we are still left with the strong sense that this document comes up short. Obviously a lot of effort has been made in preparing the housing element but it is our opinion that its collection of analysis, goals, policies, standards and actions will, when viewed in aggregate, fall far short of meeting the needs of the community.

General Concerns

The attempt to rezone ag land/open space for housing

The evidence is compelling. Preserve Ellwood Shores, save San Marcos Foothills, rally support for protecting More Mesa. Regardless of location on the South Coast, there appears to be no support whatsoever for converting large chunks of open space or ag land to residential use. Yet the housing element has selected some very significant open spaces on the South Coast for consideration as housing opportunity sites. At the same time the housing element makes it clear that there already exists more than enough land zoned for residential use to satisfy the State's mandate. We are aware of the argument that the existing parcels are not currently zoned at density levels sufficient to enable houses to be built for the price levels the county is hoping to encourage. However, wouldn't it be much more sensible and ultimately more productive to study the possibility of increasing the density allowed on parcels already zoned for residential use rather than attempting to push through rezoning of open space/ag land against overwhelming opposition?

Numbers are constantly thrown about as to how much housing we must zone for. The allocation for the unincorporated area of Santa Barbara County for this planning period is 6,064. The quantified objective is considerably lower, as few as 4,618 units. Neither of these figures includes housing already built that can count toward the allocation. According to the county, 8,547 additional units could be built under current zoning in the unincorporated area right now. There is no justification to rezone open space or

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agricultural land at this time and continued attempts to do so under the guise of the housing element will likely meet extraordinarily fierce opposition by the community. The reasonable approach is to consider increasing the density of those parcels already zoned for residential uses.

The myth of addressing the jobs/housing imbalance

Prominent throughout the discussion of affordable housing in our community is the recurring theme that those people who work in the South Coast and who commute from outlying areas deserve the chance to live closer to their jobs. The rhetoric, however, is not supported by county policies. As we understand it, the attempt to build “affordable by design” units by increasing density and easing design standards will lead to the production of units that can be created across a relatively broad spectrum of price levels. What we don’t understand is how we can be assured that any significant numbers of these units will actually be sold to those who currently commute. These will not be part of our affordable housing program but will instead be sold on the open market. We would like to see much more thought given as to how homes built to address the jobs/housing imbalance would do just that. At this point to claim that it may occur is mere speculation and it is just as likely to have the opposite result.

Traffic congestion as a result of new construction

According to the housing element, two of the three worst performing intersections on the South Coast are Patterson/101 and Patterson/Hollister. At the same time the overwhelming focus of the county for locating additional housing in the unincorporated area of Goleta is in these areas. The community is justifiably concerned about the impact of traffic on not only these intersections but also those at Turnpike/Hollister and Turnpike/Calle Real. Yet, the housing element allows the approval of projects that will degrade the operation of intersections. If this occurs the only obligation the county will have is the preparation of a deficiency plan. This is not enough. The county should make a commitment to providing timely, effective improvements to our roadways prior to approving any projects that will increase traffic congestion at these already impaired intersections.

Conflict of Interest

The housing element indicates that the county desires to work closely with both non-profit and for-profit organizations to seek ways to build more housing. At the same time, there are programs where the county will be transferring land ownership to for-profit developers and allocating funds in the housing trust fund to potentially subsidize these same developers. PANA has long been concerned about conflicts of interest that these types of situations create and we indicated as much in our comments in response to the earlier draft of the housing element. We strongly encourage the county to establish meaningful procedures for oversight by requiring participants to file financial disclosures in order to avoid the appearance of misuse of public funds and resources for private gain.

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Public participation

The county refers to the public participation that has occurred during the update of the housing element. PANA would once again like to point out that, despite the county's assertions to the contrary, public participation in this process has been negligible at best.

PANA has attended the public "road shows" and community meetings. Our concerns are such that we have written to both Supervisor Rose and Valentin Alexeeff addressing the need for more meaningful neighborhood involvement. Copies of each letter are included as attachment A and attachment B.

Concerns about specific policies proposed in the housing element

Reduced Parking Standards

In an effort to make homes affordable, the county has proposed to ease the requirements for the amount of parking provided for affordable housing. While this may have debatable merits from a short-term economic stand point, it is a huge mistake from a quality of life standpoint. If adopted for in-fill projects it will always result in the unmet parking needs of the new development overflowing into the existing, nearby neighborhoods. Previously county-approved developments in the city of Goleta provide ample evidence of this phenomenon. PANA is against the easing of any parking requirements. Design standards must reflect actual conditions, not unrealistic projections. Recent studies have shown that car ownership continues to increase while the use of mass transit does not. If the county adopts reduced parking requirements it should also implement a program to restrict and enforce overflow parking in surrounding neighborhoods that inevitably result.

The Variable Density Program

The variable density program should be removed from the housing element since it will likely accomplish more harm than good. By assigning arbitrary unit values to different sized homes, it is a clever way of increasing density. However, if the county were to reflect on the likely outcomes this program will have it would understand our concern.

County data from a local affordable housing project, the Positano Apartments, shows no measurable difference between occupancy levels of two and three bedroom units. The same number of occupants live in two bedroom units as live in three bedroom units yet the county would like to view them as being different when determining how many units can be built. This will result in overcrowding, a condition the State's housing element law specifically requires community's to avoid.

PANA would also like to know what the effect on a development built under the variable density program will have when the studio units are remodeled into two bedroom homes, or the two bedroom homes become five bedroom homes. To one degree or another this

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will occur. It will create serious problems since the original concept of the variable density program makes no provision for this.

Building heights

As mentioned above, PANA is appreciative that the county has included significant language addressing neighborhood compatibility. In light of this it is very surprising to see the housing element continue to allow four story buildings. These are in no way compatible with the existing neighborhoods in the unincorporated areas of Goleta. This provision should be removed. Three story buildings should be the very rare exception.

In-lieu fees, Service Worker Housing Policy

We understand that the county will conduct studies to determine the fees assessed for both of these policies. Just what does the county intend to study and who will be consulted? It seems very unusual to ask the community to support policies that have no specifics. More information about these policies should be provided to the public.

Density Bonus Program

According to the county's own analysis, this program has never effectively produced housing in the county. Why does the county feel that including it in this update of the housing element is of value? If it hasn't worked, let's drop it and find programs that have more promise.

The Housing Element concludes by stating that its intent is to facilitate "cooperative relationships between the government, developers, and the public." This statement is useful in that it symbolizes the entire housing element update process in Santa Barbara County – the public comes last.

The housing element is full of contradictions. It seeks to preserve open space by rezoning it for residential uses. It seeks to support compatible design by allowing four story buildings on in-fill projects in Goleta. It attempts to address the jobs/housing imbalance but has no substantive means of doing so. It endeavors to build mass transit based housing when no such infrastructure exists. It recommends continuing programs that have proved ineffective. It endeavors to build more affordable housing yet recognizes that the county will be hard pressed to enforce the terms of affordability. It asks us to support the easing of design standards to allow greater density but at the same time acknowledges that previously approved but poorly designed higher density projects have contributed to public opposition. It claims to recognize the importance of public participation in the process but any fair assessment of the presentations the county has conducted would conclude that the public has been poorly served in this regard.

It has long been our opinion that the housing element will gain the support of the community when it becomes representative of the community's wishes. We once again

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encourage the Planning Department to allow what it describes as a “citizenry well educated in the land development process and concerned about quality development” to not only voice their opinions but, more importantly, have those views taken into account.

Included as attachment C is PANA’s June 2003 editorial in the Valley Voice and attachment D, PANA’s September newsletter that describes these views in greater detail.

Sincerely,

Tim Schmidt
President, Patterson Area Neighborhoods Association

Cc: Joseph Centeno, Board of Supervisors
Joni Gray, Board of Supervisors
Gail Marshall, Board of Supervisors
Susan Rose, Board of Supervisors
Naomi Schwartz, Board of Supervisors
Valentin Alexeeff, Planning Department
Susan Jordan, Planning Commission
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