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August 8, 2017

RE: 2017 Bath St.
Appeal of ABR Denial of Short Term Rental Conversion

Mayor and Council Members:

The ABR was unable to make a finding that the project before you is “consistent with the principles of sound community planning.” By unanimous vote the Board determined that they could not make the finding because, among other things, the removal of a residential unit exacerbates a severe crisis of housing opportunities in the community. If this is not reason enough to deny the project, it should be denied on the basis of serious traffic and parking issues that Oak Park already has and the tandem parking proposed for the project.

Staff suggested a number of considerations that could be used as criteria for a “sound community” plan Finding. They included: The site’s zone allows hotels as a permitted use; there are numerous institutional uses in the vicinity; that incremental losses in housing would be balanced with housing production over time and we are on target with our housing production projections.

Our response:

Zoning predominantly deals with **uses**, rather than site-specific issues, so even if the home is in the “right” zone it may still require other approvals. This home is located in an area where medical facilities predominate, one that is experiencing strong job growth while at the same time suffering a disproportionate shortage of rental housing; it epitomizes the job-housing imbalance, which will be further exacerbated by approval of this project.

That we have an Adaptive Management Program and that we are on course with our Housing Element quantitative goals is not particularly relevant here; **no matter how you parse it, the sacrificing a housing unit for the sake of a hotel unit is counterproductive to our community needs.**

Every unit counts. Try telling a family that cannot find housing right now that the City is expected to meet its “quantified objectives for new housing construction during the planning period of 2015 to 2023.” - All may come out fine in the long run, but as Lord Keynes reminded us, “in the long run we are all dead.”

The only thing that Adaptive Management can possibly reveal to us that would excuse sacrificing a housing unit for an hotel is that the housing shortage is over, and that isn't likely.

Oak Park and Bath St., which is a major artery to the area, has a well- known parking deficit and substantial non-local traffic. The immediate area surrounding the project includes Cottage Hospital, Sansum Clinic, the Cancer Center, Pueblo Radiology, the Schott Center (1/2 block away), etc., which are regional facilities, dozens of illegal STRs, a popular local church and numerous multi-unit apartment buildings whose residents already don't have enough parking places. Additionally, some of these projects are expected to have increased parking demands as projects are completed and services are expanded. - **For this project, out-of-town guests would not only be backing out onto Bath St. with the traffic described above, but also doing tandem maneuvering. This appears to be a safety issue.**

In addition, STR occupants often host large groups of people when they use STRs for such things as: weddings, bachelor, and bachelorette parties, reunions and family or group vacations that bring individuals from out of town. – This just increases demand in an underparked neighborhood.

It would be foolish to allow this home to be converted to permanent commercial use as a hotel/STR due to the traffic, parking and safety concerns with tandem parking in this congested area of town. Finally, Santa Barbara has a documented housing crisis (residential vacancy rate of <1%) and an abundance of hotel rooms (average vacancy rate of >24%). On top of that an estimated 800 entire-unit illegal STRs are operating in the City which already compounds our housing crisis; **we don't need to further exacerbate it by converting this home into a hotel/STR.**

Respectfully,
Allied Neighborhoods Association