

# ALLIED

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July 31, 2017

RE: 812 Jennings  
Appeal of ABR Denial of Short Term Rental Conversion

Mayor and Council Members:

To be approved, this Applicant needs you to find that the project “*is consistent with the principles of sound community planning.*” The ABR was unable to make such a finding. Among the factors presented at the ABR Hearing that went into their finding were:

- The loss of a housing unit while the City faces critical housing shortage,
- The inadequacy of parking in the area, and
- The fact that once converted the home could never be converted back to residential use

Staff suggested a number of considerations that could be used as criteria for a “*sound community planning.*” This included: that the site’s zone allowed hotels as a permitted use, the mix of commercial, industrial and non-conforming residential uses in the neighborhood and that the fact that the loss of just a single home would be balanced over time with the production of additional residential units.

Our response is that:

- **The loss of even a single housing unit is counterproductive to our Housing Element’s goals and our communities housing needs.** The 800 block of Jennings Avenue has many non-conforming homes, as does the neighborhood. The Jennings home contributes to the diversity of housing types for different housing needs, which is also very important to our community.
- Any zoning objection to bring parcels into conformity will be mooted by the New Zoning Ordinance, as this light manufacturing zone will no longer permit hotel uses. – This leaves the subject parcel once again as a non-conforming use.
- **The conversion of this residential unit to commercial use as a hotel/STR serves no benefit for the community as a whole.**

All of this discussion fails to take into account the hundreds of illegal STRs that have eroded our housing inventory and that the General Plan never accounted for the popularity of STRs. – Did the General Plan account for the motivation that tempts speculators and some homeowners to replace residents with tourists?

Santa Barbara has a documented housing crisis (residential vacancy rate <1%), and an abundance of hotel rooms (average vacancy rate of >24%). Plus, an estimated 800 entire unit illegal STRs operating in the City which already exacerbate our housing crisis; we don't need to further exacerbate it by converting this home into a hotel/STR. - We support the ABR's decision, and urge you to deny this appeal.

Respectfully,  
Allied Neighborhoods Association

PS

**This Applicant recently received approval for another hotel/STR.**

Jennings Ave. only allows parking on one side of the street. The parking demand for this home as a illegal STR far exceeded the two required spaces, when most visitors have brought 4 or more vehicles.

The appeal letter (page 2) incorrectly seems to imply that ABR should not be tasked with land use approvals (i.e., Development Plan approval). **We remind you that ABR (and HLC) were given a big land use responsibility in 2013, as the approval body for AUD projects** (granting both preliminary and final approval). Additionally, the adopted NZO expands approval authority by design review bodies, including certain improvements that currently require Zoning Modifications.