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February 13, 2022

To: City Council

Re: City Council Direction On A Multi-Unit Housing Program and Regulations (February 15, 2022 Council Agenda, Item #11)

Mayor Rowse and Council Members,

Allied Neighborhoods Association appreciates the opportunity to comment on the above Council agenda item.

One firm deadline coming up is our new Housing Element in February 2023. As staff stated in early 2021, we already have adequate zoning for our upcoming RHNA numbers (Cycle 6, 2023 – 2031), and that was before passage of SB 9. More recently, staff told Council we have up to 3 years after the new Housing Element to adopt new multi-unit housing standards (not that anyone is planning on taking that long).

It is important to remember a major purpose of updating the General Plan Programmatic Environmental Impact Report (PEIR), is **to inform whatever multi-unit housing standards move forward in the future** (as we decide on our multi-unit housing standards prior to expiration of AUD early 2024).

Our current PEIR contemplated 2,795 new housing units in our General Plan planning period (to 2030), and that was prior to amended State Accessory Dwelling Unit laws, SB 9, and upzoning of the “doughnut hole” downtown AUD area. Updating the PEIR will consider impacts in a range of topic areas.

In our opinion, there has been an extremely limited amount of time, just a few days, for everyone, including Council to consider Recommendations A, B and C in the Council Agenda Report (CAR). For example, regarding the numbers in the Proposed Densities Based on Development Prototypes column (Table on pg. 7) - nobody has seen these numbers before! <u>These are very large numbers.</u>

Regarding Recommendation B, due to the limited amount of time since release of the 8-page CAR and the dense amount of material in this Report, we question whether Council at Tuesday’s meeting is

prepared to give direction on a preferred multi-unit housing scenario that would be the primary project to study in the PEIR.

The Draft FAR Map (Attachment 2) was used for the BAE Economic Feasibility Study; the Study shows what this means in three dimensions. The high density prototype diagrams show 4- and 5-story buildings, almost lot line to lot line, as seen from the street (with an alley in the back, which is not what is on the ground in SB). Is this tall lot line to lot line development really what we want for Santa Barbara?

Regarding FAR, the CAR states (pg.1): *"Regulating by FAR will be unique to different parts of the community and create a more predictable outcome for both developers and the community*." Important to remember, AUD is also unique to different parts of the community (different AUD density zones for different areas) with a corresponding density table range (as to number and size of units) for each density zone area.

Historic Resources. With the number of units contemplated in our current PEIR (2,795 new housing units) over almost 20 years, it concluded there will be significant environmental impact to historic resources. This impact could be reduced to Class 2, with mitigation measures, to be implemented. There were two in-person workshops in 2019. *"The majority of the attendees were in favor of the density changes proposed,* ***with the main provisos being to find a way to protect historic resources*** *and that more density could be supported outside the CBD as well." (*10/10/19 PC Staff Report reported on the workshops, pg. 7). (emphasis added)

In November 2019 staff presented **EIR Mitigation Vis 2 Community Character – Floor Area Ratios.** From EIR Mitigation Vis 2*: "**Develop FARs with attention to protect historic resources**, maintaining Santa Barbara's small town character, and encourage small, affordable units."* (emphasis added)

There was optimism after presentation of EIR Mitigation VIS 2 Community Character – Floor Area Ratios. But recently, that optimism has been fading as, to date, the FAR program (as it's been moving along) doesn't appear to be anywhere near fulfilling "*Develop FARs with attention to protect historic resources…"* In fact, most of the historic resources in the AUD/FAR multi-unit housing project area have **not** been addressed, acknowledged or even spoken of.

More than once, Allied asked about designated historic resources in the AUD/FAR project area (subsequently, we researched and provided to you that, as of October 2021, there were **125 designated Landmarks and 460 designated Structures of Merit** throughout the City). Since then, there have been at least another dozen properties designated as Structures of Merit - so there are approximately 600 individual designated historic resources. Most recently, a Historic Resources Map (link) was requested twice - with the AUD/FAR map area boundary delineated, so everyone could see the actual designated historic resources in the project area. To date, our requests have not been acknowledged

As additional information, looking at the potential historic district area on lower De La Vina (on the Historic Resources Map) there is one designated historic resource, a Structure of Merit. In the potential historic district area on lower Castillo Street there are ten designated historic resources, all Structures of Merit. Trying to visualize the AUD/FAR project area, without the boundary on the Historic Resources Map, it appears there are hundreds of designated historic resources – Landmarks and Structures of Merit. Without the boundary line, as we have requested, it's very difficult to approximate the number of historic resources – is it 200, or 300, or more, in the AUD/FAR project area?

The basic premise of Attachment 1 is to only show "General Plan Policies, Implementation strategies and text supporting housing in the City". The General Plan (GP) consists of several General Plan Elements which often have overlapping goals, policies and/or implementation actions, as things don't happen in a vacuum. The importance of historic resources is demonstrated by the fact they have their own GP Historic Resources Element (HRE).

From the HRE, *"HR2. **Ensure respectful and compatible development.** Seek to ensure that all development within the City respects rather than detracts from individual historic and archaeological resources as well as the neighborhood and the overall historic character of the City."*

From our May 3, 2021 letter: *"A huge economic driver of our City economy is tourism. The charm of our downtown is a big attraction for tourists.*

The visual charm of downtown includes variation of building heights, our historic resources and the El Pueblo Viejo district, our history and architecture, and sense of place between the mountains and the ocean. The challenge seems to be to find an appropriate balance of priorities – that includes housing downtown, building heights that will enhance the area but not overwhelm, while retaining the charm that attracts both tourists and locals.

In closing, it's important to keep at the forefront as this multi-unit housing standards work progresses, we have a housing **affordability** crisis here in Santa Barbara. We need to take the time to structure the multi-unit housing program to incentivize significantly more Affordable housing.

Thank you for consideration of our comments.

Sincerely,
Allied Neighborhoods Association

PS - Although few designated historic resources are in the lower De La Vina potential historic district and lower Castillo potential historic district, the importance and

significance of each area is as a whole - a dense grouping of historic, contributing, properties.

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