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May 3, 2021

To: Planning Commission

Re: Update on Multi-Unit Housing Standards (May 6, 2021, Agenda Item III)

Chair Schwartz and Planning Commissioners,

Allied Neighborhoods Association appreciates the opportunity to provide comment on the staff report and related topics.

1) The Average Unit-Size Density Program (AUD) was in response to very large condos being built under Variable Density zoning. As we move away from AUD (average unit-size density) to FAR (building size regulations), not being discussed is how FAR will be designed to not become a program of large luxury apartments. Large luxury apartments are not workforce housing, and not what we need. FAR discussions have included allowing and encouraging smaller units, but the money may be in large luxury apartments.

2) We are disappointed recent AUD rent survey information is not provided in the staff report. As background - after adoption of the AUD Program, the Planning Commission formed a subcommittee to craft survey questions. The questions were reviewed by the full Commission and recommended to City Council, and Council adopted the survey. Surveys are due annually, by December 31st.

The survey provides important data. It informs decision makers and the public of actual rental rates. In addition, some questions were designed to find out whether the Program is providing housing for our residents and workforce – or, or how many, are rented as secondary housing for folks from out of the area. The last AUD rental information provided to the Commission may be in the October 10, 2019 AUD staff report.

3) Local Preference. We need housing for locals. We need to promote local preference, and for the City to do everything legally possible. (and not just local preference for inclusionary units, as was suggested recently).

4) No-Net-Loss of Affordable Units. We appreciate the information about recent State law and protected units. No-net-loss of affordable units is very important. Success will depend on the details.

In-lieu fees. We have a question for housing staff. Does staff have any idea how long it might take to see units built using in-lieu fees? We remember staff saying it takes years to save up enough money to start a project. We have concern it may be many years to see housing on the ground.

5) 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.

6) FARs. At the 3/30 Council meeting, staff mentioned the proposed 4-story AUD project at 711 N. Milpas has an FAR of 1.6. Many members of the community were quite surprised, as the building in plan renderings appears much larger.

Using this as an example, in talking about FAR numbers – numbers can be deceptive. For discussion sake only, if this FAR was increased by 50% it would be an FAR of 2.4, but probably a 6-story building!

The online workshop had two building examples for each FAR category. These buildings were often shown as isolated examples, not in a context of large buildings one next to another, next to another. When considering FAR numbers it is important to visualize building after building, after building, and the resulting streetscape. It's not about one or two larger building among many smaller buildings – as the FAR map areas are large sweeping areas where every property owner can potentially max out their property.

7) We look forward to the consultant's report, to inform the process.

8) We appreciated the RHNA Update at Council last month; SBCAG staff reviewed the methodology and math.

Very informative presentation by City staff. Regarding zoning capacity we'll be planning for, we learned conservative estimates were used in our current Housing Element (HE) due to uncertainty of AUD (it's expiration during this Cycle 5 HE); example used was 63 units an acre areas estimated at 30. And, since this 2015 HE was adopted, the City has provided significant new zoning capacity (changes to AUD, and changes resulting from ADU state laws). It was stated, we expect we have sufficient capacity now (for Cycle 6, 2023 – 2031). At today's CPA meeting on RHNA (county staff, city staff presentations), city staff said we have zoning capacity to meet the upcoming capacity requirements

(Cycle 6). We wanted to present this information as context for the discussion on new housing.

9) We appreciate that FAR will account for all square footage – including commercial space, project amenities, and other enclosed areas such as parking. We look forward to hearing specifics about how FARs can be sensitive to historic districts and resources. FAR was brought forward by staff in response to the public workshops in 2019; the takeaway from the workshops was increased density could be supported with proviso to find a way to protect historic resources.

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."*

10) Five meeting limit (pg.5). We ask that staff please provide clarification for the public. Many AUD projects have one or more Concept Reviews (at ABR or HLC) prior to submitting a formal application to the City; do these prior-to-application-submittal meetings count towards the meeting limit? Or, does meeting limit counting begin after submittal of their application?

To assist ABR and HLC members, we suggest for each new project subject to the meeting limit, that staff, prior to the applicant presentation, let everyone know whether the meeting is one of the five.

11) Rental rates. The 10/10/19 PC AUD staff report included 604 East Cota, the marc, 316 W. Micheltorena, Arlington Village, and City-Wide Median information (2019).

Examples of more recent advertised apartment rental rates in AUD projects include:

- April 30, 2021 @Zillow. 920 Lowena, #21 (in AUD project processed under the address of 915 E. Anapamu)
  2-bedroom/2 bath (1,092 sf), $4,350/month

- April 29, 2021 @Apartments.com. Maylee Plaza (226 E. De La Guerra)
  2-bedroom/1 bath (770 sf), $3,995/month
  1-bedroom/1 bath (600 sf), $2745 - $2945/month
  In early April 2021 – 2-bedroom/1 bath (775 sf.), $4,275/month

- April 7, 2021 @Craigslist. Casa Anatega (112 E. Ortega)
  Loft 1 bedroom, 1.5 baths (#214) $4,140/month

- In early April 2021, Plaza Riveria (835 East Canon Perdido)
  Studio (#110), $2,345/month

- September 3, 2020 @Apartments.com. Arlington Village
  2-bedroom, typical price $3,887. Premium 2-bedroom $6,250.
  Premium 1-bedroom $6,250.

We appreciate your consideration of our comments and information.

Sincerely,
Allied Neighborhoods Association

Cc: Daniel Gullett, Jessica Metzger, Renee Brooke, Mayor Murillo and City Council, Ariel Calonne, Paul Casey