ALLIED
Neighborhoods Association

BOARD OF OFFICERS

Mary Turley
President

Bonnie Donovan
1st Vice President

Jean Holmes
2nd Vice President

Chris Barros
Secretary

Judy Orias
Treasurer

John DeVore
Webmaster

MEMBER ASSOCIATIONS

Braemar Ranch Neighborhood Assoc.

Bungalow Haven Neighborhood Assoc.

Citizens for Livable Neighborhoods

Citizens Planning Association

Flamingo Neighborhood Association

Grove Lane Area Neighborhood Assoc.

Hidden Valley Residents Assoc.

La Mesa Neighborhood Association

Mesa Protection Alliance

Samarkand Neighborhood Assoc.

West Beach Neighborhood.

June 2, 2020

To: Planning Commission

Re: Planning Commission Agenda - June 4, 2020 Item III
Average Unit-Size Density Incentive Program Amendments Focused on the Central Business District

Allied Neighborhoods Association has been following the proposed amendments to the AUD Downtown-Focused Package and have reviewed the May 25th staff report. We provide the following comments on these proposed changes:

1. **Allow for unbundled parking for multi-unit residential development in the CBD.**

Allied is supportive of unbundled parking, it provides flexibility for residents.

2. **Prohibit tenants of new multi-unit residential projects from obtaining on-street parking permits through the Residential Parking Permit Program**.

Allied is very supportive of this. Some older properties in the CBD, such as the apartments above the old Sojourner Café location, have been able to obtain Residential Parking Permits in the past (this allows the residents to park their cars in on-street parking 24/7/365 days.) We do not think this is appropriate for new AUD and/or multi-family housing downtown.

3. **Eliminate the open yard requirement on properties in the CBD between Chapala and Anacapa Streets.**

Within this limited area, we still think an open yard requirement is important; some common open yard should be required.

4. **Remove the Priority Housing Overlay from the potential Historic Districts on lower De La Vina and Castillo Streets.**

Allied is very supportive of the proposed AUD Program Amendment to remove the Priority Overlay and High Density designation for the potential historic districts on De La Vina and Castillo Streets. We are also very supportive of retaining the lower density zoning for the Brinkerhoff Avenue Historic District. Our historic resources are very important, contribute to the character and charm of our city, and are an important economic driver.

It was unfortunate to learn, because of Housing Element requirements and that timing, this will not move forward concurrently with the Downtown-Focused AUD amendment package - but will trail and be included in the subsequent amendment package in early 2021. We have concern with the length of time between the packages, State no-net-loss requirements, and whether this can actually be accomplished with this timing gap. We would appreciate some clarification on this from our attorney's office.

5. Allow developers to pay parking in-lieu fees in the CBD instead of providing required on-site parking.

Allied is not supportive of the focused ordinance amendment which would allow developers to pay a fee instead of providing residential parking on-site, for lots within the CBD. We understand that parking could be part parking and part in-lieu fee, but have a major concern that many projects would provide no parking.

This new ordinance provision would be useful in a very limited situation, for properties on State Street that have no opportunity for driveway access on their State Street frontage.

If in-lieu fees are adopted, we'd like to provide the following comments:

- In-lieu fee amount. Per the KM Study 2017 (Appendix A, page 15), "*building a conventional side-by-side parking space in a higher density residential project costs in the range of $30,000/space depending upon layout, design, and building efficiencies and could be $50,000+/space for subterranean parking."* Although the Study discussed an in-lieu fee of $10,000 to $20,000 per parking space, and recommended $10,000, we think that number is too low. Developers will more often choose to pay the in-lieu fee and provide little parking.

- Use of in-lieu fee. The ordinance language is too vague for the use of the funds and needs to be more specific and defined. Allied recommends maintenance of our parking structures (3 of the structures are older) be a high priority for use of the funds. Also, specify a portion for ADA improvements in the CBD.

6. Add High Density with Priority Housing Overlay in the CBD, except within the Brinkerhoff Avenue Historic District.

Allied is very supportive of retaining the current lower density zoning for the Brinkerhoff Avenue Historic District. Allied is not supportive of the proposed density increases for the CBD area as described.

This housing will be market rate and most likely very expensive due to high land prices in this area of the CBD. Recent AUD market-rate rental projects show that rental rates are not affordable, in spite of the fact that generally the units may be smaller.

Increased densities can be accomplished through State Bonus Density or our local Bonus Density Program, plus also provide true affordable price-restricted housing.

7. Increase the maximum building height limit from 45 feet to 48 feet in the CBD, C-G and M-C Zones.

We oppose an increase in the maximum building height.

Units with the current 45-foot height limit allow for 9-foot ceilings which are adequate. Adding 3 additional feet for a height of 48 feet, allows units to be promoted as high-end luxury, with 10-foot ceilings, and can command higher rental rates. This runs counter to one of the goals of the AUD Program, which is to provide workforce housing.

Additional height can be available under the State Bonus Density program and our local Bonus Density program, and under AB 1763; if provisions and requirements of AB 1763 are met, maximum height could be 3 additional stories or 33 extra feet.

8. Noticing.

Noticing for AUD Projects needs to begin with the first review, which includes any Pre-Application Reviews.

Allied previously expressed the need for community input for the AUD program and processes. We were very disappointed with the decrease in the amount of time for public review of the staff report. Per the chart on page 3 of the April 28th Council Agenda Report, the Planning Commission staff report would be released on May 25th – which would be a 10-day review period. It wasn't released until late in the day on May 28th, allowing barely 7 days for review.

The staff report is a highly technical 80-page document and takes time to read and understand; we acknowledge the staff time and effort that goes into such a document. City Council is depending on Planning Commission, and community feedback, to make these critical decisions. Allied and the rest of the community was left with limited time to read, digest and comment on all these changes which directly affect the character of the CBD and our city.

Our unique architectural impression in the CBD is mostly determined by our low density and lower building heights, and historic resources. These attributes contribute to Santa Barbara's small-town character and are important elements in the attraction of our town and our tourist economy.

Thank you for your careful consideration of these important decisions.

Sincerely,
Allied Neighborhoods Association

Cc: Renee Brooke
Daniel Gullett
Jessica Metzger
Ariel Calonne
George Buell
Paul Casey