

APPENDIX H
PUBLIC COMMENT ON THE DRAFT HOUSING ELEMENT 2009-2014

Public Participation

The 2009-2014 Housing Element update is regulatory and reductive in nature. The goal of the update is to comply with recent changes in State housing law, and to streamline prior housing goals, policies, and programs that were redundant, lacked clarity, or were in need of refinement.

The underlying policy framework and approach to this Housing Element update utilizes the basic framework of the prior Housing Element (adopted March 2004, amended February 2009) but with streamlined goals, policies, and programs. Demographic, land inventory, permit, and fiscal data has been updated, and a special study to review the Inclusionary Housing Policy (IHP) was conducted by an independent third party.

The County of Santa Barbara recognizes the importance of public participation in preparing a Housing Element that reflects the needs of the community and all of its constituencies. These groups include all County residents and neighborhood groups, as well as developer-builders, housing providers, non-profit groups, and other housing advocates. Housing stakeholders and the public will continue to be engaged in considering the best strategies to address existing and future needs.

The Office of Long Range Planning will conduct public hearings prior to submission of a Final Draft Housing Element to State HCD. Throughout the update process, the County has involved stakeholders and interested parties and will provide public notice of all hearings, both on the Office of Long Range Planning website¹ and in local newspapers. Interested parties also receive hearing notices via a mailing list, and are able to submit comments on Housing Element hearings or documents in person at relevant hearings during the public comment period, online, or by mail throughout the update process. As of summer 2009, there were 183 individuals on the email notification list for housing, and 1,363 individuals on the interested party mailing list.

In an effort to provide interested parties with a platform to provide valuable input on housing policies, the County retained a private third party consultant to conduct independent stakeholder interviews. The responses were kept anonymous in order to solicit the most comprehensive input on existing housing policies, and where feasible, have been reflected in the updated Housing Element through refined policies.

¹ Office of Long Range Planning Housing Element website location:
<http://longrange.sbcountyplanning.org/programs/housing/housing2009.php>

Targeted Outreach

In spring 2009, prior to submitting the Draft Housing Element to State HCD, the County conducted targeted outreach with housing stakeholders including non-profit housing organizations; building and construction groups; as well as private and public planning agencies. Once the County receives comments from the State Housing and Community Development Department (SHCD) on the Draft Housing Element, housing stakeholders and the public will have continued opportunity to make additional comments during the environmental review period and public hearing process before the Final Housing Element is certified. A summary of public stakeholder comments and the County response can be found in the table below.

Table H-1 – Public Outreach and County Response

Topic	Housing Stakeholder Comments	County Response and Plan for 2009-2014 Housing Element Update
State Density Bonus Law	Stakeholders requested more information about the use of State Density Bonus law, specifically; there is a need to provide education about the function and application of this program. Stakeholders also commented that density was the biggest factor in creating affordability by design.	The County will help builders provide density in their projects by promoting the State Bonus Density Program through education and direction on the program (see proposed Program 1.11 in Chapter 5 - <i>Housing Goals, Policies and Programs</i>).
	It was noted State Density Bonus is often not used because the need for affordability can negate a project's viability.	
Homelessness and Senate Bill 2	Those focusing on homeless services and needs highlighted the challenge to temporary shelters versus more permanent housing. It was noted Single Resident Occupancy (SRO) units generate minimal rent. This, combined with tax credits, makes this type of affordable housing more feasible for long term, low-cost operation.	The County is committed to participating in regional public housing programs such as the 10-year Plan to End Chronic Homelessness. The County shall also continue to work with the Housing Authority to promote projects, such as the Creekside Apartments, which provide low income special needs housing pursuant to Senate Bill 2 (see Program 5.2 in Chapter 5 - <i>Housing Goals, Policies and Programs</i>). The County noted this comports with efforts to direct housing opportunities near jobs, services and transit will also continue to work with other private and non-profit agencies who address an array of "wrap around" homeless services associated with Single Resident Occupancy units.
	Homeless advocates also reference the need for shelters in cities, not the County.	
	Comments received from those handling homeless issues also noted the need to address additional services along with housing (i.e.	

	<p>Wrap around services) such as substance abuse counseling.</p>	
	<p>It was suggested dilapidated hotels be converted to SROs, as some homeless advocates encourage SROs and other more permanent housing over shelters, which tend to be expensive to build and operate.</p>	
	<p>Community Development Block Grant (CDBG) funding can continue to be used for fair housing programs, and it is possible to earmark those funds to bolster public outreach currently being conducted by the Legal Aid Foundation on behalf of County Housing and Community Development (CHCD).</p>	
Energy Efficiency	<p>General excitement about energy efficiency and solar initiatives were noted.</p>	<p>The County is pursuing energy efficiency opportunities through several work efforts pursuant to Assembly Bill 811. In addition to energy efficiency financing districts and a proposed Climate Action Strategy, this Housing Element has proposed Programs 1.8 and 1.9 related to energy efficiency described in Chapter 5 – <i>Housing Goals, Policies and Programs</i>.</p>
	<p>Non-profit housing providers such as Habitat for Humanity are interested in energy efficiency, and noted there is interest in partnering with other non-profits such as Grid Alternatives to provide services and for permanent housing development in partnership with non-profits such as Habitat for Humanity.</p>	
Inclusionary Housing Program	<p>General comments were in favor of retaining the Inclusionary Housing Program (IHP), but that the IHP should provide for more flexibility. For example, some stakeholders requested there be no Housing Market Area (HMA) limitations on where in-lieu fees are spent.</p>	<p>The County has incorporated a specific program into this Housing Element update to address the need for IHP improvement and implementation. Through the retention of a third party consultant, the IHP was reviewed and recommendations for improvements were made. Specifically, the proposed relocation of the IHP into an ordinance will provide for the flexibility to update the provisions in the program (see Program 1.2 in Chapter 5 - <i>Housing Goals, Policies and Programs</i>).</p>
	<p>Some commented the IHP should be changed to address rental only housing product on very-low and low-income categories, with focus on providing for-sale units in the moderate-and workforce categories.</p>	

	<p>It was noted that administration and monitoring of the IHP is problematic.</p>	
	<p>Stakeholders commented that in-lieu fees associated with the IHP should be followed by additional development incentives.</p>	
Housing Product	<p>Stakeholders commented that the difficulty in gauging the demand for certain types of housing product is because there is little development occurring, and in some cases, it is difficult to find lenders willing to support certain types of development.</p>	<p>The County’s outlook on the type of development expected to occur is in line with changes in State housing law, and the State’s long term planning directive emphasizing the need to make the best use of limited land and resources through encouraging mixed use, infill and adaptive reuse. This corresponds to smaller units versus detached single family residential development (see Programs 1.3 and 1.4).</p>
Customer Service	<p>It was noted the Housing Element and associated policies and programs are too complex, confusing and redundant, and that a more “user friendly” document would be useful.</p>	<p>The County has responded to the need for housing policies that have greater clarity. Efforts to streamline the Housing Element have been central the 2009-2014 update. Policies found to be too vague or redundant have been consolidated, replaced, or modified as appropriate (see Chapters 4 and 5).</p>
	<p>Stakeholders advocated that the County continue to make affordable housing development a priority through the existing permit streamlining process and other efforts to expedite permit processing.</p>	