

DRAFT 3
City of Goleta, California
March 3, 2004
BACKGROUND REPORT NO. 15

**CITY'S CURRENT STATUS ON MEETING HCD REQUIREMENTS,
INCLUDING RHNA GOALS**

INTRODUCTION

The State of California requires that all cities and counties include a Housing Element, as one of the seven required elements to be included in the jurisdiction's General Plan. Unlike the other elements, the State requires that the Housing Element be updated approximately every five years and recertified by the State Department of Housing and Community Development (HCD). All general plan elements are required to be internally consistent with each other, both when originally written and when updated.¹

Periodically the Governor's Office of Planning and Research publishes "General Plan Guidelines" to assist jurisdictions in the preparation of a new or updated version of their entire general plan or individual elements of it. Information for this report is taken from the most recent version of these "Guidelines" published in 2003. Additional information obtained from the HCD website is used and draft copies of updated housing elements for other cities and counties.

HCD'S STATUTORY REQUIREMENTS FOR A HOUSING ELEMENT

The "Guidelines" contain nine "bullet points" delineating the type of information that is required to be included in a housing element. The guidelines are prefaced by the statement that "local governments may address these requirements in any format they deem most meaningful to meet the community's needs."² A review of housing elements from jurisdictions both within and outside Santa Barbara County shows a wide variety of formats. The nine areas to be covered are as follows:

1. "Quantifying projected housing needs. This is accomplished through the RHNA (Regional Housing Needs Allocation) process... To accommodate the RHNA, the element must demonstrate site development capacity equivalent to, or exceeding, the projected

¹ The other six required elements are Land Use, Circulation, Conservation, Open Space, Noise and Safety.

² "General Plan Guidelines", page 59.

housing need, to facilitate development of a variety of types of housing for all income levels.”

2. “Review and revise the housing element” which must include information that a) reviews the results of the previous element’s goals, objectives, policies and programs and their effectiveness, b) compares what was projected or planned in the previous element to what was actually achieved to measure the jurisdiction’s progress in implementation and c) an analysis of the “appropriateness” of the goals, objectives and policies and incorporate any needed changes to make them more effective.
3. “Describe how the jurisdiction made a diligent effort to achieve public participation from all economic segments of the community in the development of the housing element.”
4. “Assess housing needs and analyze an inventory of resources and constraints...including an analysis of population and household characteristics and needs, an inventory of land, analysis of governmental and non-governmental constraints, analysis of special housing needs, analysis of energy conservation opportunities and an analysis of assisted housing development at-risk of converting to market rate uses.”
5. “Estimate the amount of funds expected to accrue to the Redevelopment Agency Low- and Moderate- Income Housing Fund (LMIHF) over the planning period of the element and describe the planned uses for those funds.”
6. “Establish a housing program that sets forth a five year schedule of actions to achieve the goals and objectives of the element.” Information that should be contained in this program includes: a) the identification of adequate sites with appropriate zoning, development standards and public facilities that encourage and facilitate a variety of housing types to accommodate all income levels of the local share of regional housing needs, including multifamily rental, factory built housing, mobile homes, farmworker housing, emergency shelters and transitional housing, b) assist in development of housing to meet the needs of low-and moderate- income households, c) address and, where possible, remove governmental constraints on the development, maintenance and improvement of housing including housing for persons with disabilities, d) conserve and improve the condition of the existing affordable housing stock, e) promote equal housing opportunities for all persons, and, f) preserve for lower income households the assisted housing developments at-risk of conversion to market rate uses.
7. “Quantify objectives by income level for the construction, rehabilitation and conservation of housing.”

8. “Demonstrate the means by which consistency will be achieved with the other general plan elements and community goals” including an analysis of housing in the Coastal Zone.
9. “Distribute a copy of the adopted housing element to area water and sewer providers...to ensure that public and/or private water and wastewater providers provide a priority to proposed housing development projects for lower income households in their current and future resource or service allocations.”³

This report will describe each of these requirements, and the City’s progress in meeting them.

HCD REQUIREMENT NUMBER 1– QUANTIFYING HOUSING NEEDS

RHNA Allocation from SBCAG

The Santa Barbara County Association of Governments (SBCAG) is made up of the five county supervisors and one representative from each of the incorporated cities in the county.⁴ The board is responsible for a variety of tasks, including the preparation of the regional transportation plan and the allocation of federal and state transportation funds, as well as the distribution of the housing allocation required by the State Department of Housing and Community Development approximately every five years.

The housing allocation for Santa Barbara County from HCD is part of a statewide mandate to address housing issues that are related to future growth in the state. By having the same County agency do both transportation and housing planning, the State objective is consistency in planning between the two subjects. However, HCD’s statewide growth forecasts have been higher than those used for transportation planning purposes, so there is still little consistency between the two processes.⁵

HCD’s housing allocations are determined by four criteria:

1. a forecast of household growth for the period,
2. the numbers of additional units estimated to be needed to improve housing vacancy rates,

³ “General Plan Guidelines”, pages 60 and 61. It is interesting to note that the required components do not include an analysis of “jobs-housing balance”. This concept is only mentioned as an area of study in a different chapter entitled “Sustainable Development and Environmental Justice”.

⁴ Cities represented now include Buellton, Carpinteria, Goleta, Guadalupe, Lompoc, Santa Barbara, Santa Maria and Solvang.

⁵ SBCAG, “Regional Housing Needs for Santa Barbara County”, pages 1 and 2.

3. an estimate of additional units needed to avert loss through demolition of housing and
4. an estimate for the number of tribal units needed.

SBCAG describes their “RHNA” requirements as follows:

“...to determine the housing needs for households of all major income groups and...to determine each local jurisdictions share of the region’s future need....The Regional Housing Needs Assessment (RHNA) produces regional, sub-regional and local targets for the amount and type of housing needed over the seven and a half year period, January 2001 to July 2008. It takes into account unmet housing needs and anticipated housing demand generated by employment growth and population increase....The regional housing allocations are intended for use by jurisdictions when updating their housing elements. They are the basis for assuring that adequate sites and zoning are available to accommodate at least the number of units allocated. **They are not housing unit quotas that jurisdictions must achieve within the time frame of their next housing element update.** (emphasis added)...Under state housing law, existing zoning ordinances, policies, building standards and other land use regulations cannot be used by local jurisdictions as a justification for a request to reduce their RHNA housing targets except for the preservation and protection of public health and safety.”⁶

In addition, State HCD does not recognize the lack of water, sewer or other infrastructure and resource limitations as valid constraints to additional housing, even though other state law requires local general planning to address these issues. HCD apparently believes these limitations can, and should, be overcome.⁷

SBCAG has divided the County into five different Housing Market Areas (HMAs) – the Cuyama area, the Lompoc area (which includes both Lompoc and the unincorporated areas of Vandenberg Village, Mission Hills and Mesa Oaks), the Santa Maria area (which includes Guadalupe and unincorporated Orcutt), the Santa Ynez area (which includes Buellton, Solvang and the unincorporated areas of Santa Ynez, Los Olivos and Ballard), and the South County area (which includes the cities of Goleta, Santa Barbara and Carpinteria, as well as unincorporated Goleta, Isla Vista, Montecito, Summerland and Toro Canyon.)

As part of the RHNA process, SBCAG assigns each jurisdiction a housing allocation which is then subdivided between four income levels based on the area’s median income. “Very low” income is considered up to 50% of the

⁶ Ibid.

⁷ Ibid., page 74.

median, “Low” income is between 50% and 80% of median, “Moderate” is income between 80% and 120% of median and “Above Moderate” is all income levels above 120%.⁸ The 2000 census indicated that the median income for Santa Barbara County was \$46,677.⁹

The most recent RHNA allocation process began in November of 2001 with discussions between HCD and SBCAG staff. HCD’s initial allocation estimate for Santa Barbara County ranged between 19,780 and 21,761 units for this planning period. SBCAG, citing a number of reasons and statistics, requested a lesser amount – a range between 13,258 and 16,042 units. HCD’s final assignment was a range between 17,531 and 19,641 units. Included in this allocation was also a determination of how the minimum number of units would need to be divided up by income level – 4,207 units (24%) needed to be for the “very low” income category, 2,980 units (17%) for the “low” income level, 3,331 units (19%) for the “moderate” level and 7,012 units (40%) for the “above moderate” category.

SBCAG accepted the most conservative number from HCD – 17,531 units – in March 2002 and initiated a series of Technical Advisory Committee (TAC) meetings to determine the methodology for how the allotment would be distributed between the various housing market areas and the jurisdictions within them.¹⁰ Although “SBCAG is required to take into account planning factors when housing needs are allocated among jurisdictions....State law does not specifically define each planning factor, but allows the COG to address each issue....”¹¹

The factors that SBCAG used were: market demand, type and tenure, suitable sites and public facilities, employment patterns, commuting patterns, loss of assisted units, avoidance of further impaction and special housing needs. The process took three primary steps to decide each jurisdictions allocation. Step 1 was an allocation of 12,300 units based on SBCAG’s growth forecast for the seven and a half year period. Step 2 then allocated the balance of 5,230 units using an “adjustment factor” to improve jobs/housing balance. Step 3 decided the amount of units by income level each jurisdiction should have so that there would not be a concentration of very low and low income units in any particular area. In Step 1, the City of Goleta was allocated 1,133 units. In Step 2 the City was allocated an additional 1,255 units for a total allocation of 2,388.

⁸ There is no official category that HCD recognizes for “workforce” housing, usually defined locally as housing which would be affordable to persons earning between 120% and 200% of median. The building of such housing, even if price restricted, would still be considered “above moderate” by HCD.

⁹ Santa Barbara County, “Draft Housing Element”, August 2003, page 15.

¹⁰ The Technical Advisory Committee was made up of representatives from the planning staffs of the various jurisdictions. Although Fred Stouder, as City Manager, was listed as the representative for the City of Goleta in the final report, the majority of the TAC’s work was completed by the time Mr. Stouder was hired in August of 2002.

¹¹ SBCAG, “Regional Housing Needs for Santa Barbara County”, December 2002, page 8.

Adopted RHNA Allocation Model										
Refer to column notes on the last table for data sources and methodology.										
Housing Unit Growth		Housing Unit Adjustment					Income Distribution Adjustment			
Market Area/ Jurisdiction	RGF 2000 2001-2008 Housing Unit Growth	2000 Numerical and % Jobs	2000 Numerical and % Vacancy Rate	Adjustment Proportion	Adjust- ment Factor	Additional Units	Census 2000 Income Group Distributions	(%)	Regional Share By Income Group	(%)
South County Housing Market Area							Very Low	22	1,434	24
							Low	16	1,016	17
							Moderate	17	874	15
							Above Moderate	46	2,652	44
Total	2,852	109,091	2,048	290	100.0%	3,125	Total	100	5,977	100
Carpinteria City							Very Low	19	18	24
							Low	18	13	17
		7,000	315				Moderate	20	14	18
							Above Moderate	43	31	41
	75	3.9	5.7	14	4.7%	0	Total	100	75	100
Santa Barbara City							Very Low	23	560	24
							Low	16	397	17
		63,091	946				Moderate	18	397	17
							Above Moderate	43	980	42
	463	35.0	2.6	173	59.5%	1,870	Total	100	2,333	100
Unincorporated South County (Includes Montecito, Mission/Toro Canyon, Summerland and UCSB)							Very Low	23	284	24
							Low	12	201	17
		16,000	538				Moderate	14	130	11
							Above Moderate	51	587	48
	1,181	8.9	2.3	42	14.5%	0	Total	100	1,181	100
Goleta City							Very Low	16	573	24
							Low	15	406	17
		23,000	249				Moderate	19	334	14
							Above Moderate	50	1,074	45
	1,133	12.8	2.2	62	21.3%	1,256	Total	100	2,388	100

Source: SBCAG

In May 2002, SBCAG released a draft housing allocation plan for a ninety day public comment period and held one public workshop each in the north and the south county areas in mid-July. The public comment period expired in August and a noticed public hearing was held in mid-September. At the September meeting, the City of Goleta representative, Councilmember Jack Hawxhurst, requested that the methodology be reviewed and refined so that the City of Goleta did not receive an allocation which was out of proportion to what other jurisdictions were receiving. However, at the SBCAG meeting in October, the board voted 7-5 to approve the methodology and the allocations.¹²

¹² There is a process provided in the law (Section 65584.5) which allows transfers of units between jurisdictions, including between cities, if a number of requirements are met. During this RHNA process, the SBCAG board did not discuss this concept specifically, except as it might relate to annexations of county property by a City. SBCAG, "Regional Housing Needs Assessment", December 2002, Minutes of October, November and December 2002 SBCAG Board Meetings.

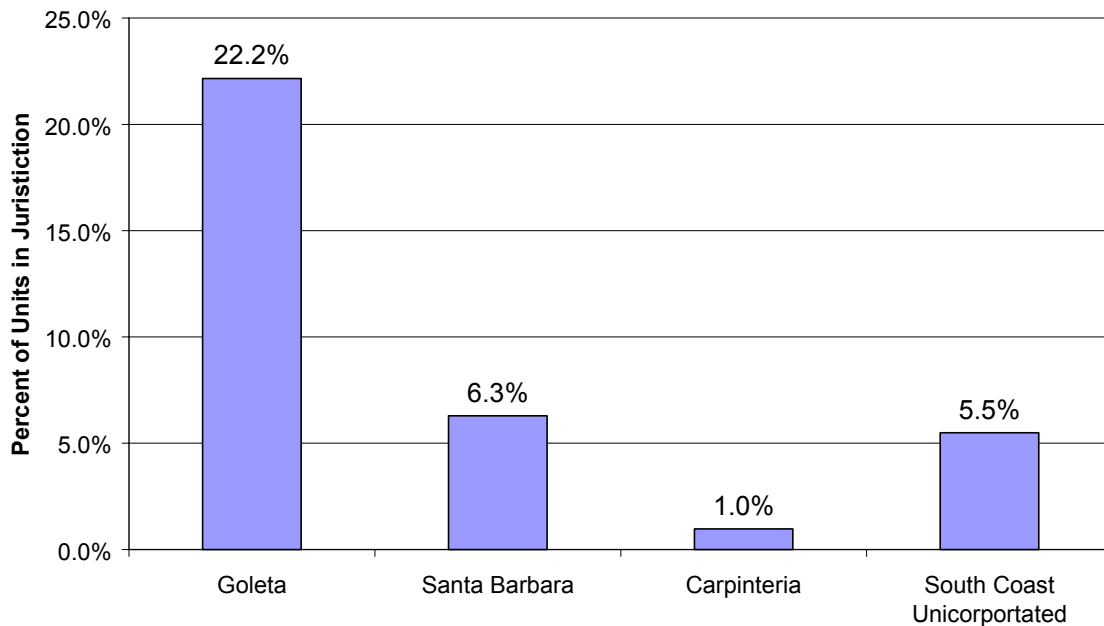
Regional Housing Need Income Allocation Summary Table

Jurisdiction	Total Units	Very Low Income	Low Income	Moderate Income	Above Moderate Income
Guadalupe	83	20	14	19	30
Santa Maria	4,837	1,161	822	1,209	1,645
Lompoc	890	214	151	209	316
Buellton	536	129	91	88	228
Solvang	325	78	55	49	143
Goleta	2,388	573	406	334	1,074
Santa Barbara	2,333	560	397	397	980
Carpinteria	75	18	13	14	31
Unincorp.Total	6,064	1,455	1,031	1,013	2,566
South Coast Unincorp.	1,181	284	201	130	567
S. Ynez Unincorp.	725	174	123	65	362
Lompoc Unincorp.	1,122	269	191	236	426
Santa Maria Unincorp.	3,014	723	512	576	1,203
Cuyama Unincorp.	22	5	4	6	7
Total County	17,531	4,207	2,980	3,331	7,012

Source: SBCAG

City of Goleta, California

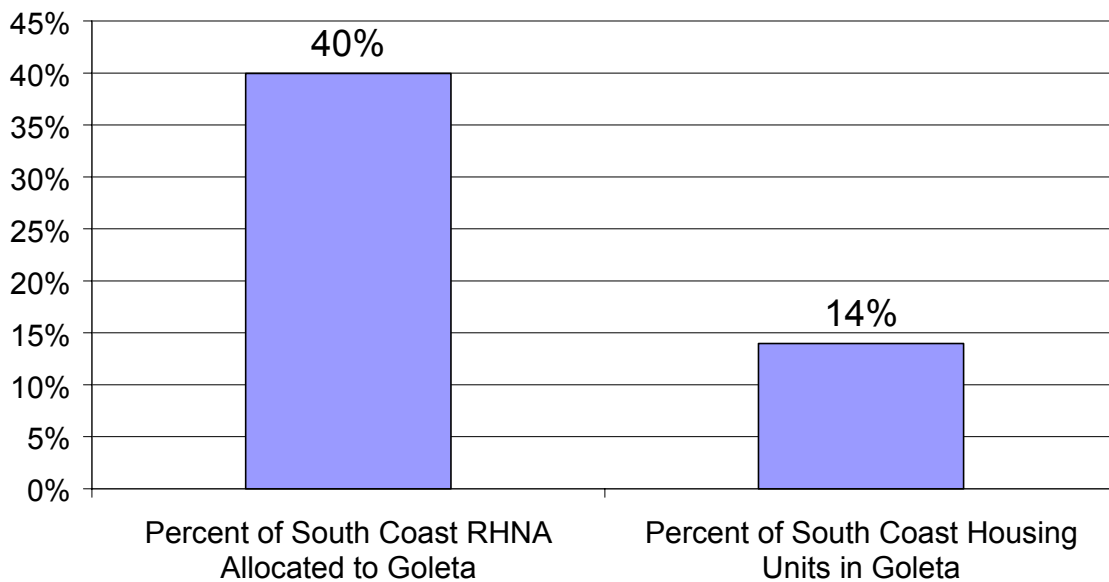
RHNA as Percent of of Total Units Existing Units



The cities of Goleta, Lompoc and Carpinteria subsequently filed appeals to have their allocations amended. At SBCAG's meeting in December of 2002, newly

hired Goleta City Planning Director, Ken Curtis, stated a number of reasons why Goleta’s appeal should be granted. Mr. Curtis mentioned that the Regional Growth Forecast, which the allocations were based upon, was completed the first month after Goleta’s incorporation and without input from the new City. He also stated that the City had not adopted the County’s general plan, nor had it completed a general plan of its own, and that the City of Goleta was the only jurisdiction to receive an allocation which exceeded its estimated “buildout”.

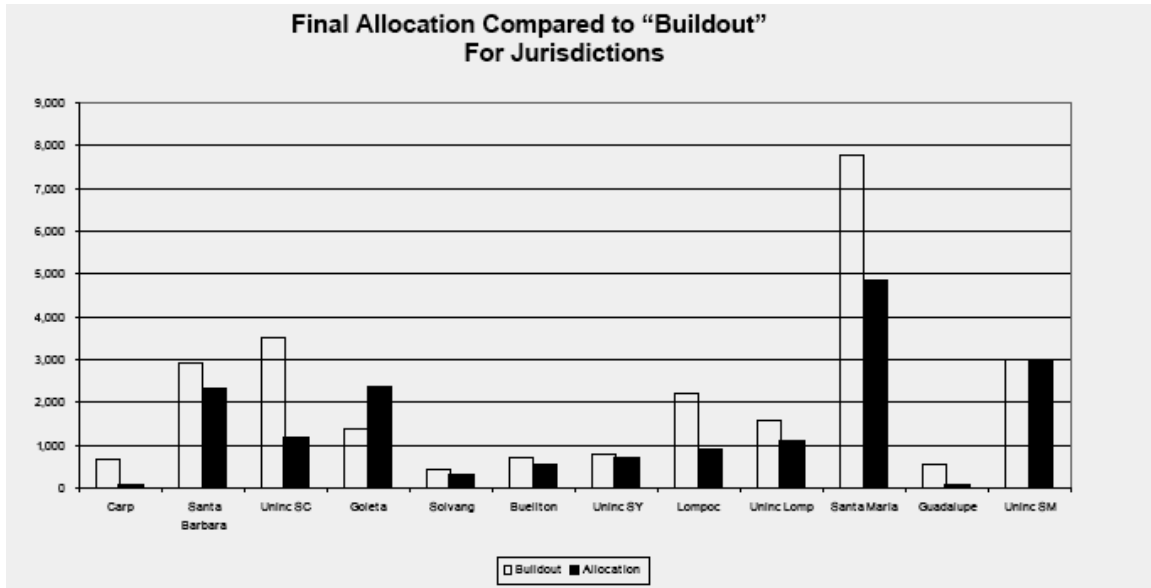
City of Goleta, California
Share of RHNA Compared to Share of Existing Housing on
South Coast



After some discussion, all but two members of the SBCAG board voted to slightly amend Lompoc and Carpinteria’s allocations, but not Goleta’s.¹³ The City’s RHNA remained at 2,388 total housing units for the period January 1, 2001 to July 1, 2008, with 573 in the very low, 406 in the low, 334 in the moderate and 1,074 in the upper moderate categories. These are the target housing goals which HCD expects the City of Goleta to plan for in the City’s first housing element.¹⁴

¹³ Dissenting members were Supervisor Urbanske, representing Fifth District and Councilmember Hawxhurst, representing the City of Goleta.

¹⁴ It should be noted that three cities in Santa Barbara County are currently considered to be “out of compliance” with HCD’s requirement for a certified housing element – Buellton, Carpinteria and Solvang.



Source: SBCAG

HCD REQUIREMENT NUMBER 2 – REVIEW AND REVISE PAST HOUSING ELEMENT

As a newly incorporated City, Goleta should not need to perform this type of review as there is no prior City housing element to evaluate. Information regarding new housing units and housing policies for the Goleta area between 1995 and 2001, including the area now incorporated, is available in the County of Santa Barbara’s current draft Housing Element.

HCD REQUIREMENT NUMBER 3 – DESCRIBE EFFORTS TO ACHIEVE PARTICIPATION FROM ALL ECONOMIC SEGMENTS OF THE COMMUNITY

City of Goleta planning personnel and consultants utilize every opportunity to involve all economic segments of the City’s population in all aspects of the planning process, both for current planning and for the preparation of the General Plan. Stringent and widespread noticing requirements are followed for all Design Review Board, Planning Agency, Redevelopment Agency and City Council workshops, meetings and hearings. Most of these meetings are held in a location readily accessible to minorities. All community meetings for the General Plan have done, and will continue to do, widespread outreach through both print and radio media. General plan community meetings include having sessions with Spanish translation and holding these sessions in areas with high concentrations of people of Hispanic descent. General Plan information is available in Spanish and specific outreach measures are undertaken to reach the Hispanic community

as well as various other special needs segments of the community.¹⁵ All of these efforts will be continued, and amplified where possible, and then documented when preparing the General Plan, including the Housing Element.

HCD REQUIREMENT NUMBER 4 – ASSESS HOUSING NEEDS AND ANALYZE AN INVENTORY OF RESOURCES AND CONSTRAINTS

Under this category is a subset of requirements which must be included in the analysis. Each requirement will be discussed separately.

Analysis of Population, Household Characteristics and Needs

Most of the information needed for this analysis has already been prepared and is included in several background reports now available for council and community review. Information may be found in the reports on “General Characteristics of Population”, “Economic Conditions”, “Housing Physical Characteristics” and “Jobs-Housing Balance.” Several other background reports including “Housing Affordability” and “Housing Conditions” are still undergoing internal review before being released. All of the information in these reports will be included, as well as any other data required by HCD, in the City’s Housing Element.

An Inventory of Land

The background report entitled “Existing Land Use” contains much of the information needed for this requirement. Any additional information required, including maps, will be obtained and included for the Housing Element.

Analysis of Governmental and Non-Governmental Constraints

This analysis has not yet been done, but will be completed. In reviewing the draft housing elements for the City and county of Santa Barbara, as well as other cities within the county and state, there seem to be a number of constraints which are common to all of the jurisdictions. These include in the “non-governmental constraints” category: land costs, construction costs, financing, site constraints and lack of community support. Under “governmental constraints”, a number of issues are generally listed including: the jurisdictions’ general or comprehensive plan which includes zoning and land use controls (including coastal zone issues), development standards, building codes and

¹⁵ For example, the General Plan Manager has already made a special presentation, with Spanish translation available, to the lower income parents of students in the “Headstart” program at the Goleta Community Center.

enforcement, development review, including design review and CEQA review and timing, fees and other exactions and public resources and infrastructure.

Analysis of Special Housing Needs

The law specifically requires an analysis of the housing needs of the elderly, persons with disabilities, large families, farmworkers, families with female heads of households and families and persons in need of emergency shelters. The analysis should include quantifying the total number of persons or households, quantifying and describing the need and identifying potential programs, policy options and resources to address these needs in the City.

Most of the information which quantifies these special needs households has already been obtained from the census data and included in various background reports. The exception is information on people considered “homeless” and in need of emergency shelters. This is a difficult number to quantify and will require further work to determine accurate numbers for the City of Goleta. Additional research will also be performed to identify and describe potential programs, resources and policy options for these special needs populations.

Analysis of Energy Conservation Opportunities

The “General Plan Guidelines” states that the purpose of this analysis is “to ensure the locality consider how energy conservation can be achieved in residential development and how energy conservation requirements may contribute to reducing overall development costs and therefore, the supply and affordability of units.”¹⁶ Other jurisdictions often discuss this issue as part of a larger analysis of all types of energy and resource conservation programs, sometimes listed under the previous “constraints” section. Some programs cited include energy conservation requirements in architectural review and water conservation programs. City of Goleta will do more research on this subject for the City’s Housing Element.

Analysis of Assisted Housing Developments at Risk of Conversion to Market Rates

Some of the information necessary to complete this analysis can already be obtained from the SBCAG “Regional Housing Needs” report and the County’s current draft housing element. The “RHNA” report notes 75 low income “Section 8” housing units at risk of conversion in the Old Town area when the existing contract expired on 9/30/01. However, the risk assessment was given as “Low” and City administration believes that the units were not converted to market rate.

¹⁶ State of California, Governor’s Office of Planning and Research, “General Plan Guidelines” 2003, p. 67.
City of Goleta, California

The County cites fourteen “very low” income affordable units in the “Winchester Commons” development at risk for conversion to market rate. These units were part of an ownership “shared equity” program only initially required to extend for ten years. Five units are due to expire in 2007, within the time frame for this housing element planning period. Another nine units are due to expire between 2009 and 2010. City administration will be investigating these projects and this issue further in order to provide complete information for the City’s housing element.

HCD REQUIREMENT NUMBER 5 – ESTIMATE THE AMOUNT OF FUNDS EXPECTED TO ACCRUE TO THE REDEVELOPMENT AGENCY LOW AND MODERATE INCOME HOUSING FUND

This estimate requires accounting for the current funds available in the RDA “LMIHF” account, as well as an analysis of how much the fund might total during the course of the housing element planning period – in this case, between now and July 1, 2008. The analysis must also include a description of the planned uses for the fund.

As of June 30, 2003, the City of Goleta’s Redevelopment Agency Housing Fund contained \$494,871. This amount only includes the required 20% “set aside” funds, and does not include any monies from other sources such as HOME and CDBG funds. The City of Goleta does participate in both the HOME and CDBG programs and will be receiving funds from both of those sources as well. Current and anticipated future amounts from these, and other, funding sources will be estimated as part of the General Plan process and included in the Housing Element section as required.

While the planned use of these funds is yet to be determined, the community will have the opportunity to review and comment on any recommendations as part of the General Plan process prior to final amendment or approval by the City Council. It is important to remember that the use of all of these housing funds is not restricted to providing low and moderate housing opportunities just in the RDA area, but could be used for any project in any part of the City which meets the criteria set by HCD and the funding source.¹⁷

¹⁷ RDA assisted units not located in the project area boundary count only 50% towards meeting the RDA’s “inclusionary” housing requirement.

HCD REQUIREMENT NUMBER 6 – ESTABLISH A HOUSING PROGRAM THAT SETS FORTH A FIVE YEAR SCHEDULE OF ACTIONS TO ACHIEVE THE GOALS AND OBJECTIVES OF THE ELEMENT.

This category provides the opportunity to utilize all of the information which has already been gathered by complying with the previous HCD requirements and compile a list of goals and policies to meet the City's housing objectives and RHNA goal over the planning period. The housing program is required to:

- identify adequate sites with appropriate zoning, development standards and public facilities for a variety of housing types and income levels
- assist in the development of low and moderate income housing
- address and, where possible, remove governmental constraints
- conserve and improve existing affordable housing
- promote equal housing opportunities for all
- preserve low income housing from conversion to market rate

The housing program is the “heart” of the housing element. City administration is still in the process of gathering information to complete this requirement and have not yet begun to draft this section.

HCD REQUIREMENT NUMBER 7 – QUANTIFY OBJECTIVES BY INCOME LEVEL FOR THE CONSTRUCTION, REHABILITATION AND CONSERVATION OF HOUSING.

Although the RHNA number is the target goal which HCD requires the City to plan for, it does not mandate how many units must be constructed during the housing element planning period. Given the anticipated governmental and non-governmental constraints which might exist, the City is required to estimate the numbers of housing units, and at what income level, that might actually be constructed during the housing element time frame.

In addition, the City must estimate how many housing units might be rehabilitated and how many affordable units might be conserved. The total of the three numbers is the City's “quantified objective”, which may, or may not, equal the RHNA number. When the City of Goleta updates its Housing Element in the future, it will be required to analyze how much housing was actually built, rehabilitated and conserved-and at what affordability levels- compared to the City's previous quantified objectives. In assessing this requirement it might be

useful to examine how the nearby jurisdictions of the City of Santa Barbara and the County area addressed this requirement for their past and present targets.

City of Santa Barbara and the County of Santa Barbara

The County’s current draft housing element update shows that, during their last housing planning period between 1993 and 2000, their quantified objectives for the initial five year period totaled 3,999 units. Extensions from the state legislature lengthened the period to seven years during which time a total of 3,499 housing units were actually produced in unincorporated Santa Barbara County.¹⁸

Affordable Housing Objectives and Production, 1993 HE Planning Period Unincorporated Santa Barbara County					
Quantified Objectives, 1993-1997					
Income Category Housing Type	Very Low	Low	Moderate	Above Moderate	Totals
New Construction	290	407	464	2,359	3,520
Conservation	373	31	25	0	429
Rehabilitation	25	25	0	0	50
Totals	688	463	489	2,359	3,999
Actual Housing Production 1993-2000					
Income Category Housing Type	Very Low	Low	Moderate	Above Moderate	Totals
New Construction	321	102	173	2,739	3,335
Conservation	8	100	0	0	108
Rehabilitation	28	28	0	0	56
Totals	357	230	173	2,739	3,499
Shortfall/Overage	(331)	(233)	(316)	500	(500)

Sources: 1993 Housing Element and Planning and Development Affordable Housing Database Table 37

The County’s latest RHNA allocation totals 6,064 units for all of the unincorporated areas of the County – 1,455 units at the very low income level, 1,031 at the low income level, 1,013 at the moderate level and 2,566 at the above moderate level. However, as can be seen from the chart below, the County’s quantified objectives for the period January 2001 to July 2008 are for a total of 4,960 units, 82% of the total RHNA number. 786 are in the very low category, (54% of the RHNA goal for that income level), 969 in the low category, (94% of RHNA), 714 in the moderate category, (70% of RHNA) and 2,491 at above moderate, (97% of RHNA). These numbers were estimated by the County

¹⁸ The County’s initial housing planning period was 1990-1997 for which the RHNA allocation for all the unincorporated areas totaled 8,969 units out of a total County requirement from HCD of 18,969. (The South Coast unincorporated area’s share was 3,748 units.) Between 1990 and 1992, the County constructed 1,312 units, leaving a 7,657 unit balance county-wide to be achieved by the end of 1997. An additional 3,499 were built by 2000. When added all together, the County built 4,811 units in the decade of 1990 to 2000, about 54% of their RHNA allocation. Santa Barbara County, “Housing Element”, November 1993, pages 34 and 35.

based on the past performance of the County’s housing program and the various possible constraints to housing production foreseen over the next seven years.¹⁹

Quantified Objectives, January 2001 – July 2008 Unincorporated Santa Barbara County						
Housing Type	Income Categories				Totals without Service Constraints	Totals with Service Constraints
	Very Low	Low	Moderate	Above Moderate		
Unincorporated Santa Barbara County						
New Construction	548	626	614	2,491	4,279	3,937
Conserved Housing	210	315	100	0	625	625
Rehabilitated Housing	28	28	0	0	56	56
Totals	786	969	714	2,491	4,960	4,618

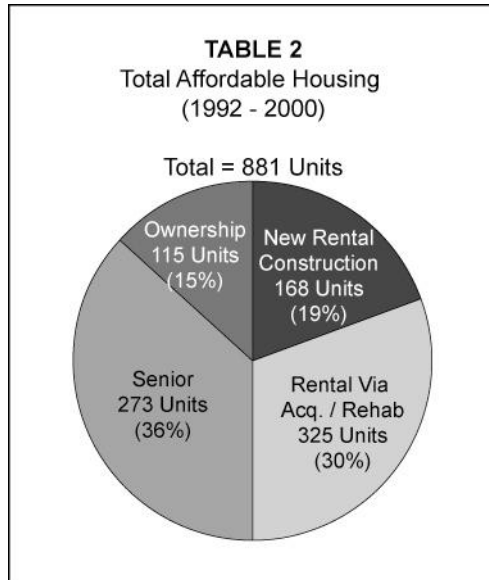
Source: Planning and Development *Table 51*

The City of Santa Barbara’s 1995 Housing Element stated that their RHNA allocation for the planning period 1990-1997 was 2,418 housing units. Similar to the County, their planning period also ended up being extended to the year 2000. For 1990 and 1991, the City of Santa Barbara added 96 units through new construction and conversion.²⁰ Between 1992 and 2000, the City added 881 units, which were a combination of both new construction, conversion and rehabilitation, for a total of 977 units for the decade and about 40% of their RHNA for that planning period.²¹

¹⁹ The “service constraints” column refers to water and sewer providers in the County who have referenced infrastructure and/or service constraints for their service areas. All water and sewer providers throughout the unincorporated areas of the County who had potential new housing units and commercial growth in their service areas cited either infrastructure or service constraints, or both, to providing new service when asked by County P&D staff. The exception was the Goleta Water and Sanitary Districts, which both cited no constraints to serving an estimated 1,800 + new units. Santa Barbara County, “Draft Housing Element”, page 58.

²⁰ City of Santa Barbara, “1992 Housing Element”, page 75.

²¹ City of Santa Barbara, “Draft Housing Element Update”, September 2003, page 34.



Source: City of Santa Barbara

The City of Santa Barbara’s RHNA for the current planning period of 2001 to mid 2008 is 2,333 units, divided between 560 very low, 397 low, 397 moderate and 980 above moderate income housing units. Their quantified objectives are estimating they will actually provide 1,127 total units, 48% of their RHNA total.

Table 62 – Quantified Objectives 2001 – 2007

Income Group	New Units Constructed	# Units Conserved	# Units Rehabilitated	Total
Very Low Income:	197	100	60	357
Low Income:	143	83	62	288
Moderate Income:	10	84	10	104
Above Moderate:	378	N/A	N/A	378
Total Units	728	267	132	1,127

Source: City of Santa Barbara

City of Santa Clara

A different example from outside Santa Barbara County of how quantified objectives can be achieved is provided by the City of Santa Clara, California. Santa Clara is in northern California in the San Francisco Bay region, located between the cities of San Jose and Sunnyvale in the heart of “Silicon Valley.” Santa Clara shares a number of similarities with the city of Goleta. Both cities

have very little vacant land left within their boundaries, as well as citizens who have expressed opposition to large high density housing projects. And both cities were given large RHNA allocations to accommodate within a seven year period. Santa Clara was given a housing allocation of 6,339 units by ABAG, the Association of Bay Area Governments, for the period 1999-2006.²²

Despite these, and other, constraints, the city was able to not only accommodate the full RHNA number, but exceed it with a planned quantified objective of 7,544 units. This was accomplished primarily through proposed changes in the application of “mixed-use” zoning. The city planned to not only rezone some acreage to “Mixed-Use”, but also to establish two new “overlay” districts, one entitled “Gateway Thoroughfare Mixed Use” and one entitled “Transit Oriented Mixed Use”. These changes were estimated to provide 91% of their quantified objectives. Santa Clara’s housing element was approved by HCD and won a planning award.²³

City of Goleta

Based on current and potential development activity in the City of Goleta, it is possible to anticipate how the City might approach addressing the HCD requirement. Although the City of Goleta has not yet completed an estimate for the “quantified objectives” portion of the City’s first housing element, it is possible to list a number of housing projects that are either built, or approved, or have an application in process which could count towards the City’s RHNA responsibility for this planning period. The table on the following page illustrates an estimate of where the City is currently in providing housing opportunities. The RHNA allocation for Goleta is 2,388 housing units

In addition to the units identified in the table, there are approximately 50 acres of City property already zoned for residential uses which are currently vacant. If built out at base densities, the acreage could support an additional 515 units of various types. This yields a grand total of 1,941 units, 1,426 housing units from the table on the next page, plus 515 units possible on vacant residential land. This represents 81% of RHNA.

While various decisions are still pending in both the City’s permit process and the general plan, this tabulation indicates the City of Goleta has the capability to meet all of its current RHNA goal by including some moderate estimates for other types of conservation and rehabilitation projects and/or some additional rezoning of parcels for housing as part of the General Plan process. Some examples of this could be projects to rehabilitate housing structures in Old Town and conserving opportunities to rent or own mobile homes. The combination of any of

²² Santa Clara’s 2000 census population was 102,361.

²³ City of Santa Clara, “Housing Element”, July 2002.

these efforts could offset any loss of potential units not already approved. It would also be the City's responsibility to make sure that the housing units developed would be at the various affordability levels needed as determined by HCD and that are contained within the overall RHNA number.

Project Name	SFD's and 2 nd Units	APT.	CONDO	SPECIAL NEEDS	CONSERVED	REHABBED
Maravilla				363		
Willow Springs		235				
Cerebal Palsy				13		
Quixote		2				
Yardi		6				
Sumida Gardens		200				
El Encanto		16				
Ellwood Beach		8				
Individual LUP's	10					
Fairview Gardens				5		
Comstock Homes*	76					
Old Town Village			38			
Fairview Mixed Use			2			
Gordon Mixed Use			2			
Villages at Los Carneros*			264			
PreApps*		99				
Winchester Commons					5	
Old Town			41			18
Total	86	566	347	404	5	18
Grand Total						1,426

*Needs a Rezone

HCD REQUIREMENT NUMBER 8 – DEMONSTRATE THE MEANS BY WHICH CONSISTENCY WILL BE ACHIEVED WITH THE OTHER GENERAL PLAN ELEMENTS AND COMMUNITY GOALS, INCLUDING THE COASTAL ZONE

As the City of Goleta is writing its first General Plan, all elements are being written at the same time and under the supervision of the same City personnel. This makes it easier to ensure that all of the parts of the plan will be consistent with each other.

HCD REQUIREMENT NUMBER 9 – DISTRIBUTE A COPY OF THE ADOPTED HOUSING ELEMENT TO AREA WATER AND SEWER PROVIDERS

The City will ensure that a copy of the final adopted housing element is provided to both the Goleta Water and Sanitary Districts. Although the stated purpose of this requirement is to guarantee that such providers make serving new affordable housing projects a priority, a review of the policies of both the Goleta Water and Sanitary Districts for the background reports on “Water” and “Wastewater” did not demonstrate such a written priority.

PLANNING IMPLICATIONS

Although the California State Department of Housing and Community Development has a number of stringent requirements which must be met for a jurisdiction to have a certified housing element, the requirements are quite clear and manageable. The City has already started gathering the information needed to satisfy all of the requirements and are quite confident that the City’s first housing element will be approved by HCD when it is submitted to them. In addition, even a cursory analysis of the City’s ability to plan for the current RHNA number indicates that the City should not have any problem accommodating the full number of units assigned no matter what type of alternative the community and council ultimately choose.

While this analysis indicates the potential to meet the current RHNA, doing so may substantially reduce the limited capacity available to the City for meeting future allocations after year 2008. As noted from the SBCAG analysis, the current RHNA exceeded the zoned capacity of the City for residential development. The current RHNA can be met only with rezones and counting the conservation of low income units. Once this rezoned land is developed and the conserved units counted, this capacity will not be available to meet future

allocations. By meeting the current RHNA the city would be built out under current zoning.