

Appendix C

Public Participation Summary

Public participation is an important component of the planning process in Carpinteria, and this update to the Housing Element has provided residents and other interested parties numerous opportunities for involvement. The following section describes the City's efforts to ensure broad public engagement, particularly by persons and organizations representing the interests of lower-income households and persons with special needs, and describes how public comments were incorporated into this Housing Element. All materials published by the City were made available in both English and Spanish.

Stakeholder notification list. At the outset a stakeholder list was compiled including persons and organizations representing the interests of lower-income households and persons with disabilities and other special needs (see Table C-1).

Housing Element website and FAQ. A Housing Element web page was created on the City website¹ and a *Housing Element Frequently Asked Questions* was prepared (Figure C-1) and posted on the website.

Public meetings. Over the course of the project a total of six public meetings were held to discuss the Housing Element update. Meetings were held both in-person and online to enable those with mobility difficulties to conveniently participate. With the exception of one multi-jurisdictional housing workshop held at the City of Santa Barbara Central Library, the in-person location for public meetings was Carpinteria City Hall, which is located on a bus line and, given the City's small size, is readily accessible to residents throughout the City. Public notices, agendas and materials for all City Housing Element meetings were posted on the website and at City Hall in advance of each meeting and also sent directly by mail or email to the list of stakeholders, which included housing advocates and non-profit organizations representing the interests of lower-income persons and special needs groups. Notices of public hearings were also published in the local newspaper as required by law.

For each public meeting the City offered reasonable accommodation for persons with disabilities to assist them in participating in the meeting, including the availability of transcription of meeting minutes for non-English speakers. Transcribed minutes were made available by the City and may also be easily translated into many other languages via free web applications such as Translate.Google.com. Real-time transcription of the meetings



SAVE THE DATE

South Coast Housing Workshop

Wednesday • June 22, 2022 • 4-6pm
 Santa Barbara Central Library • Faulkner Gallery
 40 East Anapamu Street

Come learn about the Housing Element process, regional needs, and local challenges. You will have the opportunity to discuss solutions to South Coast housing challenges with local representatives. This event will include a panel discussion and breakout groups for each jurisdiction.

Register now to be entered to win Amazon gift cards.

Register at bit.ly/southcoasthousing
 Livestream bit.ly/housing-livestream

Logos: City of Carpinteria, City of Goleta, County of Santa Barbara, County of San Luis Obispo, County of Santa Barbara, Santa Barbara Foundation



RESERVE LA FECHA

Taller Sobre Vivienda en la Costa del Condado

Miércoles • 22 de Junio, 2022 • 4-6pm
 Biblioteca Central de Santa Bárbara • Galería Faulkner
 40 East Anapamu Street

Venga a aprender sobre el Proceso de Elemento de Vivienda, las necesidades regionales, y los desafíos locales. Tendrá la oportunidad de discutir soluciones a los retos de vivienda de la Costa Sur del Condado con representantes locales. Este evento incluirá un panel de discusión y grupos de trabajo para cada jurisdicción.

Regístrese ahora para participar en el sorteo de tarjetas de regalo de Amazon.

Regístrese en bit.ly/southcoasthousing
 Transmisión en vivo bit.ly/housing-livestream

Logos: City of Carpinteria, City of Goleta, County of Santa Barbara, County of San Luis Obispo, County of Santa Barbara, Santa Barbara Foundation

¹ <https://carpinteriaca.gov/city-hall/community-development/planning/housing-element-update/>

was available using web applications such as Live Transcribe or Live Caption. Video of each public meeting is also posted on the City website at <https://carpinteriaca.gov/city-hall/agendas-meetings/>.

The initial public meeting for the Housing Element update was a Planning Commission study session conducted on June 6, 2022. Interested parties had the option of attending in persons or remotely, which allowed those with mobility issues a convenient way to participate. The purpose of the meeting was to introduce the Housing Element update process to the community and City Planning Commission. The presentation included State requirements, an overview of the Housing Element update process, key housing issues to be addressed, current housing needs, the Regional Housing Needs Assessment, potential constraints to housing, and opportunities for public participation. Comments during the study session included the following:

- ADUs are an important source of housing and should be encouraged but they are expensive to build – does the City have any leverage to encourage affordable ADUs?
- The City should confirm the current capacity for housing before amending zoning
- Concern about housing development in the unincorporated area adjacent to the city
- Density higher than 25 units/acre may be appropriate to encourage more housing development
- How would sea level rise affect housing capacity?
- It is important to maintain land for industrial use to preserve jobs and avoid becoming a bedroom community
- Taller buildings may be appropriate in some locations
- Working from home has become much more common – how does that affect housing demand?

On June 22, 2022 a South Coast Housing Workshop was conducted at the Santa Barbara Central Library. The workshop was jointly sponsored by the County of Santa Barbara, the City of Santa Barbara, the City of Carpinteria, the City of Goleta and the Santa Barbara Foundation. The workshop included a presentation, a panel discussion and breakout group discussions for each jurisdiction.

A second Planning Commission public meeting was conducted on August 1, 2022. Interested parties had the option of attending in persons or remotely. The focus of this meeting was identifying potential options and locations for expanding housing development opportunities. Potential strategies included adding a housing overlay zone in areas where zoning does not currently allow housing and increasing allowable densities. A representative from People's Self Help Housing attended the meeting and provided information regarding affordable housing development and options for increasing development opportunities in Carpinteria.

The initial public review draft Housing Element was then prepared and posted for public review on October 10, 2022. Notice of the availability of the draft Housing Element was sent to all parties on the stakeholder list (Table C-1). The draft element was reviewed at a joint public meeting conducted by the City Council and Planning Commission on October 17, 2022. Comments at that meeting are summarized in Table C-2 and included concerns about how future sea level rise will impact housing supply and the importance of ADUs and the Residential Overlay in creating additional housing opportunities to accommodate regional housing needs.

After the required public review period pursuant to Government Code Section 65585 the draft Housing Element was submitted to the Department of Housing and Community Development (HCD) for review on November 23, 2022 pursuant to Government Code Section 65585(b). HCD's comment letter was provided on February 21, 2023.

After receiving HCD's review letter, a revised draft Housing Element was prepared and posted for public review on March 16, 2023. Notice of the availability of the revised Housing Element was sent to all parties on the stakeholder list (Table C-1).

On March 20, 2023 the Planning Commission conducted a public hearing to review the revised Housing Element and receive public comments. At the conclusion of the hearing, the Planning Commission recommended that the City Council approve the revised Housing Element and find the adoption of the Housing Element exempt from the

California Environmental Quality Act (CEQA) Guideline Section 15061(b)(3), and directed staff to supplement, amend and revise the Housing Element further to clarify provisions of the revised Housing Element.

On April 10, 2023 the City Council conducted a public hearing to review the revised Housing Element, Planning Commission recommendations, and receive public comments. At the conclusion of the hearing the City Council voted unanimously to adopt the Housing Element.

HCD provided a review letter on June 12, 2023 stating that while the adopted housing element addresses many statutory requirements, additional revisions were necessary to fully comply with State Housing Element Law. City staff worked with HCD staff to address HCD's comments and prepared revisions to the adopted Housing Element. The City posted the revised draft Housing Element for seven days of public review on [REDACTED]. Following this public review, the City submitted the revised draft Housing Element to HCD for review on [REDACTED]. After receipt of additional comments from HCD, the City Council reviewed the revised draft Housing Element at a public hearing on [REDACTED]. At the conclusion of the hearing the City Council [REDACTED].

In addition to public comments offered at public meetings, the City received written comments from California YIMBY, the Grey Panthers Santa Barbara Network, the Carpinteria Valley Association, People's Self Help Housing, the California Coastal Commission, and several individuals. Copies of those letters are provided below.

Table C-2 provides a summary of public comments received on the draft Housing Element and how those comments have been addressed.

**Table C-1
Housing Element Stakeholder List**

Carpinteria 6th Housing Element
Stakeholder List
Master Mailing List

Coastal View News
Attn: Debra Herrick
4856 Carpinteria Avenue
Carpinteria, CA 93013

Home Builders Association of the
Central Coast
P.O. Box 748
San Luis Obispo, CA 93406

California Rural Legal Assistance
2050 S Broadway, Suite G
Santa Maria, CA 93454

Housing Authority of Santa Barbara
County
815 West Ocean Ave.
Lompoc, CA 93436

Santa Barbara County Housing
Trust Fund
P.O. Box 60909
Santa Barbara, CA 93160

Santa Barbara Contractors Association
914 A Santa Barbara St.
PO Box 23409
Santa Barbara, CA 93121

Coastal Housing Coalition
P.O. Box 50807
Santa Barbara, CA 93150

Legal Aid Foundation of Santa Barbara
County
301 E. Canon Perdido St.
Santa Barbara, CA 93101

League of Women Voters
328 E. Carrillo St., Ste. A
Santa Barbara, CA 93101

SB Association of Realtors
1415 Chapala St.
Santa Barbara, CA 93101

New Beginnings Counseling Center
324 E. Carrillo St., Ste. C
Santa Barbara, CA 93101

Transition House
425 E. Cota St.
Santa Barbara, CA 93101

Peoples' Self Help Housing
26 E. Victoria St.
Santa Barbara, CA 93101

Chance Housing
13 E. Haley St.
Santa Barbara, CA 93101

Santa Barbara Community Housing Corp
11 E. Haley St.
Santa Barbara, CA 93101

AIA Santa Barbara Chapter
229 E. Victoria St.
Santa Barbara, CA 93101

The Towbes Group, Inc.
21 E. Victoria St., Ste. 200
Santa Barbara, CA 93101

City of Santa Barbara
Com Development Dept.
P.O. Box 1990
Santa Barbara, CA 93102

Habitat for Humanity of Southern
Santa Barbara County
P.O. Box 176
Goleta, CA 93116

S.B. County, Planning and Development
123 East Anapamu St.
Santa Barbara, CA 93101

Tri-Counties Regional Center
520 East Montecito St.
Santa Barbara, CA 93103

Central Coast Collaborative on
Homelessness
P.O. Box 1990
Santa Barbara, CA 93102

Environmental Defense Center 906 Garden St. Santa Barbara, CA 93101	Diana F. Rigby, Superintendent Carpinteria Unified School District 1400 Linden Avenue Carpinteria, CA 93013	Rental Housing Mediation Task Force City of S.B., Community Dev. Dept. 630 Garden St. Santa Barbara, CA 93101
Housing Authority of the City of Santa Barbara 808 Laguna St. Santa Barbara, CA 93101	Cottage Health System 400 W. Pueblo St. Santa Barbara, CA 93105	Price Robert G/Lorraine M Trustees (for) Price Robert G/Lorraine M Fam Tr 2310 Nw Highland Dr Corvallis OR 97330
Santa Barbara County Fire Dept. 4410 Cathedral Oaks Blvd. Santa Barbara, CA 93110	MTD 550 Olive St. Santa Barbara, CA 93101	First 5 Santa Barbara County 1306 Santa Barbara St. Santa Barbara, CA 93101
Independent Living Resource Center 423 West Victoria Street Santa Barbara, CA 93101-3619	Sarah House P.O. Box 20031 Santa Barbara, CA 93120	Center for Successful Aging 228 E. Anapamu Street, Ste. 203 Santa Barbara, CA 93101
Santa Barbara Alliance for Community Transformation PO Box 217 Santa Barbara, CA 93102	Victor and Susan Schaff 2000 Cravens Lane Carpinteria, CA 93013	CA Coastal Commission Attn: San Fearer 89 S. California Street #200 Ventura, CA 93001-2801
Carpinteria Sanitary District Attn: Craig Murray 5300 Sixth Street Carpinteria, CA 93013	Carpinteria-Summerland Fire Protection District Attn: Todd Jenkins 1140 Eugenia Place, #A Carpinteria, CA 93013	Carpinteria Valley Water District Attn: Brian King 1301 Santa Ynez Avenue Carpinteria, CA 93013
Santa Barbara County Air Pollution Control District Attn: Land Use & Environmental Review Program 260 N. San Antonio Road, Suite A Santa Barbara, CA 93110-1315	Southern California Edison Attn: Rondi Guthrie, Government Relations Mgr. 10060 Telegraph Rd Ventura, CA 93004	Southern CA Gas Company Attn: Tim Mahoney 134 E. Victoria Street Santa Barbara, CA 93101-2047
E.J. Harrison & Sons Attn: Nan Drake PO Box 4144 Ventura, CA 93007	Santa Barbara County Planning and Development Attn: Daniel Klemann 123 E. Anapamu Street Santa Barbara, CA 93101	Congressman Salud Carbajal 24th Congressional District 360 S. Hope Ave, Suite C-301 Santa Barbara, CA 93101

Santa Barbara County
Environmental Health Services
Hazardous Mitigation Unit
Attn: James Ray
225 Camino del Remedio
Santa Barbara, CA 93110

Santa Barbara County CEO Office
Attn: Dennis Bozanich
105 E. Anapamu Street, Rm 406
Santa Barbara, CA 93101

Congresswoman Julia Brownley
26th Congressional District
300 E. Esplanade Drive, Suite 470
Oxnard, CA 93036

Santa Barbara County LAFCO
Attn: Paul Hood
105 East Anapamu Street
Santa Barbara, CA 93101

Santa Barbara MTD
Attn: Steve Maas
550 Olive Street
Santa Barbara, CA 93101

Carpinteria Valley Association
PO Box 27
Carpinteria, CA 93014

Santa Barbara Association of
Governments
Attn: Marjie Kirn
260 N. San Antonio Road, Suite B
Santa Barbara, CA 93110-1315

Santa Barbara County
Agricultural Commissioner
Attn: Cathy Fisher
263 Camino del Remedio
Santa Barbara, CA 93110-1335

County of Santa Barbara
Housing and Community Development
Attn: Dinah Lockhart
123 E. Anapamu Street
Santa Barbara, CA 93101

Assemblymember Monique Limón
37th District
101 W. Anapamu Street, Suite A
Santa Barbara, CA 93101

Honorable Hannah-Beth Jackson
State Senator 19th District
222 E. Carrillo Street, Suite 309
Santa Barbara, CA 93101

Santa Barbara County
1st District Supervisor Das Williams
105 E Anapamu Street
Santa Barbara, CA 93101

Linkedin Corporation
C/O Legal Department
1000 W Maude Ave
Sunnyvale Ca 94085

Gonzalez, Jose E Trust 2/17/99
Po Box 1136
Carpinteria Ca 93014

6384 Via Real, LLC
12100 Wilshire Blvd 320
Los Angeles Ca 90025

Linkedin Corporation
1000 W Maude Ave
Sunnyvale Ca 94085

Caldwell Child's Trust
C/O Cochrane Property Mgmt Inc
102 W Arrellaga St
Santa Barbara Ca 93101 2916

Logue Family Trust 6/3/08
11322 Idaho Ave
Los Angeles Ca 90025 3179

South Coast Business Park Owners
Assoc
Po Box 1275
Carpinteria Ca 93014

Medel, William E
1095 Holly Ave
Carpinteria Ca 93013 1852

Zannon, Tristan Boyd
Po Box 21957
Santa Barbara Ca 93121

Rotz Roland N
4675 Rice Pl
Ventura Ca 93003

Freitas Family Trust 7/12/02
4620 Carpinteria Ave
Carpinteria Ca 93013

Reynolds Carpinteria LLC
1933 Cliff Dr 2
Santa Barbara Ca 93109 1585

Rpg Carpinteria LLC
C/O Steven Leonard
315 South Coast Highway 101 U-12
Encinitas Ca 92024 3543

Crooks Patrick
4643 Carpinteria Ave
Carpinteria Ca 93013 1813

Bega/Us , Inc
1000 Bega Way
Carpinteria Ca 93013

Agilent Technologies Inc
12100 Andrews Dr
Plain City Oh 43064 9148

Times 2, LLC
220 W Montecito St
Santa Barbara Ca 93101

H & R Investments, Lp
1187 Coast Village Rd 10j
Santa Barbara Ca 93108

Norman, Charles R Trust
8665 Duarte Rd
San Gabriel Ca 91775

Broudy Cindy Lane, LLC
Po Box 90111
Santa Barbara Ca 93190

Park Lane Properties LLC
1005 Mark Ave
Carpinteria Ca 93013

Hdngr Grp Dac LLC
1750 Nw Nato Pkwy 106
Portland Or 97209 2532

Bve, LLC
190 Serafin Way
Carpinteria Ca 93013

Gigavac Building, LLC
1332 Anacapa St 200
Santa Barbara Ca 93101

Carpinteria Storage Place, Lp
Po Box 5717
Santa Barbara Ca 93150

Carpinteria Storage Place, Lp
Po Box 5717
Santa Barbara Ca 93150

Scheeff, D & C Family Trust 5/29/18
820 Erhart Rd
Arroyo Grande Ca 93420

Mimaki Properties Lp
2329 Terra Bella Ln
Camarillo Ca 93012

Norman, Charles R Family Trust
8665 Duarte Rd
San Gabriel Ca 91775

Ksa Coastal, LLC C/O Alexander C
Deconde
1465 Sycamore Cyn Rd
Santa Barbara Ca 93108

Shepard Place Ltd
Po Box 20130
Santa Barbara Ca 93120

Delwiche Family Trust 6/17/10
7032 Casitas Pass Rd
Carpinteria Ca 93013

Berkenmeier, Robert J & Sugiyama,
Janice M Family Living Trust 3/4/05
1065 Eugenia Pl
Carpinteria Ca 93013

Godfrey, James E Trustee
(For) Godfrey Fam Trust
317 Silverado Ave
Santa Maria Ca 93455 1699

Eugenia Associates Co Robert J Godfrey
1090 Eugenia Pl 101
Carpinteria Ca 93013 2011

Gallant, Philip A
1140 Eugenia Pl 8
Carpinteria Ca 93013

Hanrahan Residual Trust 9/28/89
111 Calle Bello
Santa Barbara Ca 93108

003-870-001
Desandre Living Trust 7/9/15
1101 Eugenia Pl A
Carpinteria Ca 93013

Lizarraga, John Peter & Patricia Trust B
8/17/98
412 S K
Lompoc Ca 93436

Svb Properties
165 Olive Mill Ln
Montecito Ca 93108

Eugenia Spaces, LLC
2886 East Valley Rd
Santa Barbara Ca 93108 1612

Mallard Partners, LLC
Po Box 249
Nipomo Ca 93444

Meister, Craig & Sharon Family Trust
3165 Serena Ave
Carpinteria Ca 93013

Brand Assest Management LLC
Po Box 250
Carpinteria Ca 93014 0250

Paderno Holding Co
1101 Eugenia Pl C
Carpinteria Ca 93013

Brand Assest Management LLC
Po Box 250
Carpinteria Ca 93014 0250

Figure C-1 Housing Element FAQ



Frequently Asked Questions

2023-2031 Housing Element Update

1. What is a Housing Element?

State law¹ requires each city to adopt a comprehensive, long-term General Plan for its physical development. General Plans include several “elements” that address various topics. The Carpinteria General Plan² is organized into the following elements:

- Land Use
- Community Design
- Circulation
- Open Space, Recreation & Conservation
- Safety
- Noise
- Public Facilities & Services
- Housing

Most portions of city General Plans have a “time horizon” of 20-25 years; however, State law requires that Housing Elements be updated every 8 years. Housing Element planning periods are sometimes referred to as *cycles*. The City’s current Housing Element covers the planning period extending from 2015 to 2023, which is referred to as the “5th Housing Element cycle” in reference to the five required updates that have occurred since the comprehensive revision to State Housing Element law in 1980. Every city in the Santa Barbara County Association of Governments (SBCAG) region is required to prepare a Housing Element update for the 6th planning cycle, which spans the 2023-2031 period.

State law³ establishes detailed requirements for Housing Elements, which are summarized in California Government Code Section 65583:

The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

¹ California Government Code Sec. 65300 *et seq.*

² <https://carpinteriaca.gov/city-hall/community-development/planning/>

³ California Government Code Sec. 65580 *et seq.*



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2. What are the most important issues that must be addressed in the Housing Element?

The major issues that must be addressed in the Housing Element are: 1) how City policies, plans and regulations help to meet the region's housing needs for people at all income levels; and 2) how City land use regulations accommodate the special housing needs of persons with disabilities or other difficulties.

- **Accommodating Regional Housing Needs.** Every community is dependent on a variety of low- and moderate-income workers in jobs such as child and elder care, medical support, business and personal services, retail trade, and maintenance. While governmental programs provide funding assistance for affordable housing, city plans and regulations determine the type of housing that can be built. Therefore, a sufficient supply of affordable housing is dependent on both financial assistance and city development regulations.

Under State law⁴ all cities are required to plan for additional housing to accommodate population growth and existing housing problems such as overcrowding and high housing cost. State law recognizes that most housing is built by private developers, not cities. However, cities are required to adopt policies, plans, and development regulations to encourage a variety of housing types that are affordable for persons at all income levels, including multi-family rental housing and accessory dwelling units (ADUs). The Regional Housing Needs Assessment (RHNA) is the process by which each jurisdiction's share of new housing needs is determined (see #4 below).

- **Housing for Persons with Special Needs.** Under State law⁵ cities must also ensure that their plans and regulations encourage the provision of housing for persons with special needs including:
 - ✓ Reasonable accommodation for persons with disabilities
 - ✓ Transitional and supportive housing
 - ✓ Residential care facilities
 - ✓ Emergency shelters and "navigation centers"

3. What is "affordable" housing?

By definition, housing is considered "affordable" when total housing cost, including utilities, is no more than 30% of a household's gross income. State law describes five income categories, which are based on county median income as shown in Table 1.

Table 1. Household Income Categories

Income Category	% of County median income
Extremely low	Up to 30%
Very low	30-50%
Low	50-80%
Moderate	80-120%
Above moderate	Over 120%

Source: California Government Code Sec. 65584(f)

⁴ California Government Code Sec. 65583

⁵ California Government Code Sec. 65583(a)(5)



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Affordable housing costs for all jurisdictions in Santa Barbara County that correspond to these income categories are shown in Table 2. Affordability figures are adjusted each year and are based on family size.

Table 2. Income Categories and Affordable Housing Costs – Santa Barbara County

Income Category	Maximum Income	Affordable Rent	Affordable Price (est.)
Extremely low	\$41,900	\$1,048	\$135,000
Very low	\$69,850	\$1,746	\$255,000
Low	\$111,900	\$2,798	\$415,000
Moderate	\$120,100	\$3,003	\$445,000
Above moderate	>\$120,100	>\$3,003	>\$445,000

Assumptions:

- Based on a family of 4 and 2022 State income limits
- 30% of gross income for rent or principal, interest, taxes & insurance plus utility allowance
- 10% down payment, 5.5% interest, 1.25% taxes & insurance, \$350 HOA dues

Source: Cal. HCD; JHD Planning LLC

4. What is the “RHNA” why is it important?

Each California city is required to plan for new housing to accommodate a share of regional needs. RHNA is the process established in State law⁶ by which each city’s housing needs are determined.

Prior to each Housing Element planning cycle the region’s total housing need is determined by the California Department of Housing and Community Development (HCD) based upon economic and demographic trends, existing housing problems such as overcrowding and overpayment, and additional housing needed to ensure reasonable vacancy rates and replace units lost due to demolition or natural disasters. The total housing need for the region is then distributed to cities and counties by SBCAG based upon criteria established in State law.⁷

In January 2021 HCD determined that the total new housing need for the SBCAG region in the 6th Housing Element cycle is 24,856 units. SBCAG then prepared a RHNA plan that allocates a share of the RHNA to each jurisdiction in the region.⁸ Table 3 shows the RHNA allocations for Carpinteria and the SBCAG region.

Table 3. 6th Cycle RHNA – Carpinteria and SBCAG Region

	Carpinteria	SBCAG Region
RHNA allocation 2023-2031 (housing units)	901	24,856

Source: SBCAG, 7/15/2021

The RHNA Plan distributes each jurisdiction’s total housing need among the income categories shown in Tables 1 and 2 above (the extremely-low and very-low categories are combined for RHNA purposes). The 6th cycle RHNA allocation for Carpinteria by income category is shown in Table 4.

⁶ California Government Code Sec. 65584 et seq.

⁷ California Government Code Sec. 65584(d)

⁸ <http://www.sbcag.org/rhna.html>



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Table 4. 6th RHNA by Income Category - Carpinteria

Very Low	Low	Moderate	Above Moderate	Total
286	132	135	348	901

Source: SBCAG, 7/15/2021

5. Is the RHNA a construction quota or mandate?

The RHNA allocation identifies the amount of additional housing a jurisdiction would require in order to have enough housing at all price levels to fully meet the needs of its existing population plus its expected population growth over the next 8 years while avoiding problems like overcrowding and overpayment. The RHNA is a planning requirement that identifies housing need, *not a construction quota or mandate*. Jurisdictions are not required to build housing or issue permits to achieve their RHNA allocations, but State law establishes specific requirements when housing production falls short of RHNA allocations. One such requirement is streamlined review of housing development applications that meet specific standards.⁹ Other than requirements for streamlined permit processing, there are currently no legal or financial penalties imposed on cities that do not achieve their RHNA allocations.

6. What must the City do to comply with the RHNA?

The Housing Element must analyze the City's potential capacity for additional housing based on an evaluation of land use patterns, development regulations, development constraints (such as infrastructure availability and environmental conditions) and real estate market factors. The analysis must be prepared at a parcel-specific level of detail and identify properties where additional housing could be built consistent with current regulations. This evaluation is referred to as the "sites analysis" and State law requires the analysis to demonstrate that the City has adequate capacity to fully accommodate its RHNA allocation in each income category. If the sites analysis does not demonstrate that adequate capacity exists to fully accommodate the RHNA, the Housing Element must describe what steps will be taken to increase capacity commensurate with the RHNA – typically through amendments to land use and zoning regulations that could facilitate additional housing development.

Under State law, areas that are zoned to allow residential or mixed-use development at a density of at least 20 units/acre in the smaller cities of Santa Barbara County, including Carpinteria, are considered appropriate for affordable housing in the very-low and low income categories. Potential accessory dwelling units (ADUs) can also accommodate future housing need in all income categories.

The sites analysis is one of the most important components of the Housing Element update.

⁹ California Government Code Sec. 65913.4 (SB 35 of 2017)



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7. Housing development is very expensive in Santa Barbara County. What happens if cities don't achieve their assigned housing needs?

Housing development is very expensive, particularly in coastal areas, and housing that is affordable to low- and moderate-income families typically requires large subsidies. While State housing law is based on the premise that every city has an obligation to use its governmental powers to encourage housing development at all income levels, it is recognized that available financial resources are not sufficient to produce all of the affordable housing needed. Therefore, if a city has adopted appropriate plans and regulations to encourage housing development commensurate with its RHNA allocation, it will not be penalized if actual production does not achieve assigned needs. However, under some circumstances State law requires that cities provide streamlined permit processing of housing developments if housing production falls short of RHNA goals.

8. What is “certification” of the Housing Element and why is it important?

The State delegates authority to HCD to review Housing Elements and issue findings regarding the elements' compliance with the law.¹⁰ If HCD issues a finding that the Housing Element is in substantial compliance with State law it is referred to as “certification” of the Housing Element. In 2015, HCD determined that Carpinteria's current Housing Element was in full compliance with State law. The City is now preparing a Housing Element update for the 2023-2031 period.

Housing Element certification is important for two main reasons:

- **Local control.** The General Plan establishes the foundation for the City's land use plans and regulations, and the Housing Element is part of the General Plan. If the City were challenged in court on a land use matter and the Housing Element were found by the court to be out of compliance, the court could order changes to City land use plans and assume control over some City land use decisions. In such circumstances, HCD certification would support the City's legal defense. Recent laws also allow for courts to impose fines if a jurisdiction fails to adopt a compliant Housing Element.¹¹
- **Eligibility for grant funds.** Some State grant funds are contingent upon Housing Element certification.

9. What is the process and timeline for the Housing Element update adoption and certification?

State law requires every city in Santa Barbara County to prepare a Housing Element update for the 6th planning cycle, which spans the 2023-2031 period. The due date for adoption of the revised Housing Element is February 15, 2023. Cities are required to submit a draft Housing Element to HCD for review prior to adoption, and the City must consider HCD's comments in its decision to adopt the Housing Element. After adoption by the City Council, the Housing Element must be submitted for a second review by HCD. If HCD finds

¹⁰ California Government Code Sec. 65585

¹¹ AB 101 of 2019



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that the adopted Housing Element fully complies with the requirements of State law it is referred to as “certification” of the Housing Element (see also #8 above).

10. How can I find out more about the 2023 Housing Element update?

The City has created a Housing Element webpage (<https://carpinteriaca.gov/city-hall/community-development/housing/>) where meeting notices, draft documents, and other materials will be posted throughout the course of the project.

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Table C-2
Housing Element Public Comment Summary

Commenter	Comment	How this comment has been addressed
<i>The comments listed as “General Public Comments” below are a summary of comments received during the city’s initial housing element public outreach meetings including Planning Commission meetings on June 6, 2022 and August 1, 2022, and a joint City Council/Planning Commission meeting on October 17, 2022.</i>		
General Public Comments	We have a housing crisis	Yes, the State Legislature has declared there is a housing crisis in California. The programs contained in this Housing Element are intended to address the housing crisis to the extent the City has the ability to do so.
General Public Comments	The housing market is strongly influenced by investors	Yes, many factors contribute to housing problems that are beyond the City’s control, such as housing speculators and investors, State environmental regulations, State and Federal tax policy, private business decisions, and the cost of labor and materials. The Housing Element describes these constraints in Section III of the Technical Report and proposes program to address constraints to the extent feasible in Section II of the Housing Element.
General Public Comments	If a site is listed in the inventory, is it required to be developed for affordable housing?	No, the sites inventory only describes where additional housing could be built based on zoning regulations. Property owners will decide if and when development occurs, and for what income categories, subject to any City inclusionary requirements. The City or the State cannot force property owners to develop their property for housing.
General Public Comments	Lower-income sites should be located in high opportunity areas to affirmatively further fair housing.	As noted in Appendix D of the Technical Report, most of the City is designated as a moderate resource area per State TCAC/HCD Composite Opportunity Maps. While there are two small areas at the edge of the city designated high resource areas, these areas are developed with Carpinteria High School and the Sandpiper Mobile Home Park. There is no opportunity for additional residential development in the foreseeable future in these areas.
General Public Comments	Development should not permanently displace current residents. Housing replacement programs, temporary housing vouchers, right of return, and	Program 1 in the Housing Plan addresses risk of displacement and includes a commitment to ensure

Commenter	Comment	How this comment has been addressed
	demolition controls will create stability for renters while allowing new homes to be built for new households and to accommodate the growth associated with RHNA. In your sites inventory and rezoning programs, you should prioritize development on sites with owner-occupied housing & commercial uses over those with existing rent-controlled apartments or other rental housing with lower income residents.	compliance with legal protections and replacement housing requirements for existing tenants who may be displaced by new developments in accordance with applicable law. The majority of the sites identified in the sites inventory do not include existing residential units.
General Public Comments	The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.	The Housing Element supports home ownership through first-time homebuyer programs (Program 18), Inclusionary Housing requirements (Program 6), as well as through the expansion of housing development opportunities (Program 1).
General Public Comments	Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity. This density should be emphasized around jobs and transit and should go beyond the Mullin density in those areas.	As described in Appendix B (Sites Inventory) the analysis of realistic capacity considers development standards such as height and floor area ratio (FAR) to facilitate development at the assumed densities. In addition, Program 1 stipulates minimum densities for candidate opportunity sites and the development of land use controls to achieve those standards.
General Public Comments	Allow residential to be built in areas that are zoned for commercial use.	The City zoning code presently allows for residential on all sites zoned for commercial and industrial uses as "mixed use" development which includes parcels with present commercial uses. Some sites zoned for commercial have a Residential Overlay applied to them which allows for residential-only development on commercial properties. As described in Program 1 and Appendix B (Sites Inventory) the proposed candidate opportunity sites include areas that are currently zoned for commercial or industrial use that are being considered for application of the Residential Overlay.
General Public Comments	Support for R-Overlay to allow additional housing in the downtown commercial core and commercial/industrial areas	Program 1 in the Housing Plan includes a zoning amendment on sufficient sites to create additional opportunities for new housing commensurate with the RHNA allocation. The Housing Element also describes that the City's zoning allows residential use on all commercial and

Commenter	Comment	How this comment has been addressed
		industrial zoned parcels through mixed use development and/or residential-only development.
YIMBY Law (Feb. 28, 2022)	The Policies and Programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. We repeatedly see findings that housing prices are high, segregation exists, and there is a lack of housing for special populations, but the Policies and Programs don't respond to these findings or try to change outcomes. The overview of the city's housing environment should set the scene, and the policies and programs should explain what the city is going to do to fix it.	The Technical Report contains an analysis of the issue areas identified in the letter. The Technical Report analysis was used to inform and craft the City's Policies and Programs specified in the Housing Policy Plan (Section II of the Housing Element).
	<p>Affirmatively Furthering Fair Housing</p> <p>1. Prioritize rezoning in high resource, historically exclusionary neighborhoods. Many of the highest resource neighborhoods with the best access to jobs, good schools, and other amenities have histories of exclusion which are still reflected in their zoning. Cities should rezone to allow more housing opportunities in those neighborhoods, particularly those with low Vehicle Miles Traveled, as part of their Housing Elements.</p> <p>2. Establish a strong tenant protection ordinance so that new housing benefits everyone. Development should not permanently displace current residents. Housing replacement programs, temporary housing vouchers, right of return, and demolition controls will create stability for renters while allowing new homes to be built for new households and to accommodate the growth associated with RHNA. In your sites inventory and rezoning programs, you should prioritize development on sites with owner-occupied housing & commercial uses over those with existing rent-controlled apartments or other rental housing with lower income residents.</p> <p>3. Support homeownership opportunities for historically excluded groups. Homeownership continues to be a path to building financial security and inter-generational wealth, which has been systematically denied to many Americans. As a society, we need to make this right by intentionally offering opportunities to communities who have been excluded. The housing element should identify opportunities to create a variety of for-sale housing</p>	<p>1. As noted in Appendix D of the Technical Report, most of the City is designated as a moderate resource area per State TCAC/HCD Composite Opportunity Maps. While there are two small areas at the edge of the city designated high resource areas, these areas are already developed areas and there is no opportunity for additional residential development in the foreseeable future. The Housing Element identifies Candidate Sites throughout the City in moderate resource areas to provide for the option for property owners to develop affordable housing under existing mixed-use provisions or under the proposed residential overlay throughout the City. All identified sites are located near services, jobs, recreation and transit.</p> <p>2. Program 1 in the Housing Plan addresses risk of displacement and includes a commitment to ensure compliance with legal protections and replacement housing requirements for existing tenants who may be displaced by new developments in accordance with applicable law. The Site Inventory and Candidate Site Inventory generally prioritize owner-occupied housing and commercial uses and parcels with additional capacity for residential development.</p>

Commenter	Comment	How this comment has been addressed
	types and create programs to facilitate property ownership among excluded groups.	3. Program 6 (Inclusionary Housing) and 18 (Workforce Homebuyer Down Payment Loans) promote homeownership opportunities for low and moderate income households and families, including but not limited to historically excluded groups. The Housing Element further supports home ownership through the expansion of housing development opportunities (Program 1).
	<p>Site Capacity</p> <p>4. Adequately plan for density. Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity. Housing will not be feasible if you have a high density paired with low height limits. This density should be emphasized around jobs and transit and should go beyond the Mullin density in those areas.</p> <p>5. Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%. Not every site will be developed at maximum density during the eight-year planning period. Identify an ample amount of opportunity sites and zone the sites to accommodate lower-income housing types (usually a statutory minimum of 30 dwelling units per acre) to give the city the best chance at meeting its RHNA.</p> <p>6. Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory. Likelihood of development is a measure of the probability of an inventory site being developed during the planning period. The median likelihood of development across the state is 25%, meaning only one of every four sites will likely be developed during the planning period for the median city. Incorporating the likelihood of development into the zoned capacity will set the city up to successfully achieve their RHNA, making the housing element less of a paper exercise and more of an actionable, functional document.</p>	<p>4. As described in Appendix B (Sites Inventory) the analysis of realistic capacity considers development standards such as height and floor area ratio (FAR) to facilitate development at the assumed densities. In addition, Program 1 stipulates minimum densities for candidate opportunity sites and the development of land use controls to achieve those standards.</p> <p>5. Program 1 in the Housing Plan addresses Not Net Loss requirements of state law. The Site Inventory analysis and Candidate Site Inventory also include conservative assumptions regarding density of development based on development trends in the city during the last housing element cycle. The Candidate Sites list (Table B-6) identifies potential sites for more than 10 times the number of lower-income housing units required to be accommodated per the City's RHNA allocation.</p> <p>6. The Housing Element relies on data from development patterns within the City, including data from the 5th Cycle in the Site Inventory and Candidate Site Inventory. Technical Report, Appendix B describes all of the assumptions used in developing the site inventories.</p>
	Accessory Dwelling Units	7. Program 2 describes the City's efforts to support the development of accessory

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	<p>7. Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element. We highly recommend complying with HCD's standards of using one of its "safe harbor" methodologies to anticipate future ADU production. However, if the city is optimistic about ADU growth, then creating an automatic mid-cycle adjustment will automatically facilitate alternative housing options (i.e., a rezoning program, removing development constraints, ADU incentives, etc.) if the city falls behind the estimated ADU production.</p> <p>8. Incentivize new ADUs, including those that are rent-restricted for moderate or lower-income households or that are prioritized for households with housing choice vouchers. Consider offering low- or no-interest loans, forgivable loans, impact fee waivers for ADUs that are 750 square feet or larger, allowances to facilitate two-story and second-story ADU construction, etc.</p>	<p>dwelling units (ADUs) during the 6th Cycle. The City further commits to annual review of ADU regulations and to take additional actions if production is not meeting the Housing Element objectives by the mid-point in the planning period (2027).</p> <p>8. See response above. Program 2 also includes the development of two standardized pre-approved ADU designs to reduce costs and facilitate the streamlined approval and construction of ADUs anticipated to be affordable to moderate and low income households.</p>
	<p>Zoning</p> <p>9. Allow residential to be built in areas that are zoned for commercial use. There are a myriad of ways to do this, but a housing overlay is one common policy. Additionally, consider eliminating new commercial space in mixed-use developments where there is not a strong demand or there is otherwise a glut of commercial space that is unused or frequently vacant.</p> <p>10. Allow flexibility in inclusionary zoning. Cities should require different percentages for different AMI levels. Additionally, we urge cities to incentivize land dedication to affordable developers in order for market-rate developers to meet their inclusionary requirements. Avoid getting trapped into thinking that the affordable units must be "sprinkled throughout" the market-rate units, or require the market-rate units to look exactly the same as the affordable ones. This should be balanced against not locating all of the affordable units in one place and ghettoizing neighborhoods by creating or perpetuating racially concentrated areas of poverty.</p>	<p>9. The City zoning code presently allows for residential on all sites zoned for commercial and industrial uses through mixed use development and/or residential-only development. As described in Program 1 and Appendix B (Sites Inventory) the proposed candidate opportunity sites include areas that are currently zoned for commercial use and that are considered for additional residential-only opportunities.</p> <p>10. Program 6 promotes the development of inclusionary housing in for-sale developments in the City. Program 1 describes the City's process to develop parameters for its residential overlay to provide sufficient flexibility for developers.</p>
	<p>Better Entitlement Process & Reducing Barriers to Development</p> <p>11. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing. A discretionary process for housing development</p>	<p>11. The Housing Element describes the City's permit process for a variety of types of residential development. The City is located entirely within the California Coastal Zone and processes some development (e.g., ADUs) through</p>

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	<p>creates uncertainty and adds to the cost of construction. For example, multi-family housing should not require a conditional use permit or city council approval unless the builder is asking for unique and extraordinary concessions. Right-sizing governmental constraints, entitlement processes, and impact fees will help the city successfully meet its RHNA.</p> <p>12. Reduce parking standards and eliminate parking minimums. Minimum parking requirements are a major constraint on housing, especially for lower cost housing types. They can cost in excess of \$30,000 per spot and can raise rents by as much as 17%, and eliminating them is particularly important for smaller & other spatially constrained sites. Consider adopting a parking maximum.</p> <p>13. Cap fees on all new housing. Most construction costs are outside the City's control, but reducing impact fees can demonstrate that a city is serious about building new housing. At a minimum, cities should delay the collection of impact fees until the issuance of the certificate of occupancy to reduce financial impacts on new housing and make the units cheaper by not asking the developer to carry impact fee charges or debt throughout the construction phase.</p> <p>14. Provide local funding. One of the largest barriers to building new affordable homes is the lack of city/county funds available to assemble sites, provide gap funding, and to pay for dedicated staff. Without new funding, especially at the local level, we will not be able to build more affordable homes. There are three new revenue streams that should be considered: 1) Transfer tax, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) Vacancy tax may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) Commercial linkage fees should be adopted or revisited for increases on new commercial developments.</p>	<p>administrative coastal development permits consistent with applicable law. Program 11 includes a commitment to eliminate the CUP requirement for SRO housing.</p> <p>12. The Technical Report (Section III.A) evaluates governmental constraints on residential development including parking requirements. Programs 3, 5, 6 and 9 address reducing parking requirements to accommodate residential development consistent with applicable law.</p> <p>13. Programs 1, 2 5, and 10 contemplate reductions of development fees for residential projects consistent with the City's goals to promote affordable housing and maintain its existing facilities.</p> <p>14. Programs 4, 5, 15, 16, 18 include commitments to facilitate local funding and secure state and federal funding to support the development of housing.</p>
Gray Panthers Santa Barbara Network (July 31, 2022)	<p>We ask you to prioritize older adults as a specific goal in your Housing Element planning.</p> <ul style="list-style-type: none"> Define "senior housing" more clearly to include requirements for accessibility and access to services. 	<p>The City evaluates the needs of seniors in Section I.E.2 of the Technical Report and addresses the needs of seniors in a variety of ways, including compliance with building code accessibility requirements (Municipal Code Title 15);</p>

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	<ul style="list-style-type: none"> • Zone for more senior housing options to meet senior needs as they progress through the senior housing care continuum. • Expand “by right” zones in which senior housing with services is permitted. • In commercial zones, expand permitted uses for licensed residential care, with conditional use permits for independent living as a “by right” use. • Provide regulatory incentives for builders by adding a regulatory “fast track” incentive for builders on senior housing projects. • Assure needed senior housing is located appropriately to transportation options. <p>Older Adults need housing that is accessible and built according to ADA and applicable housing legislation/regulations & specifications. Countywide, 31% aged 60 and over identify as having a disability.</p>	<p>zoning regulations to streamline and encourage senior housing, assisted living and residential care facilities; and provide reasonable accommodation for persons with disabilities (Program 11).</p>
Russell Ruiz (Oct. 14, 2022)	<p>I hope you direct Staff to compromise our parking requirement to the minimum possible. Particularly in Carpinteria the argument that Downtown you can reduce or eliminate parking requirements for high density housing is a myth. People living Downtown in Carpinteria are not going to be walking to work in most cases. They will use cars and they need to have somewhere to park them other than on neighborhood streets where parking is already constrained. I am very concerned about what I heard from our Consultant on the Downtown T planning. High density small units in second stories of commercial properties with not required parking for those units. In my opinion, a very bad idea.</p>	<p>Section III of the Technical Report analyzes parking as a zoning constraint on the development of housing within the City. The Housing Element also includes programs to address parking requirements for residential projects.</p>
Eddie Seigel (Oct. 16, 2022)	<p>My family moved to Carpinteria when I was about 4 years old, and I lived there until I left for college. My childhood home, a perfectly normal 3bd house in Seacoast Village, has doubled in value since my parents sold it in 2014, according to Zillow. Not unrelatedly I, like all of my childhood friends, no longer live in Carp.</p> <p>First, I want to applaud the small but mighty city staff for putting together a thoughtful, detailed, time-intensive document. The Housing Element provides over double the zoned capacity above the RHNA target in its site inventory which is much more than Goleta or Santa Barbara provided in theirs.</p>	<p>The Housing Element includes an analysis of housing costs within the City in Section I.D.3 of the Technical Report and acknowledges that housing costs within the City have risen based on a variety of factors.</p> <p>The Site Inventory conservatively estimates the potential residential units that can be constructed under existing zoning. The Candidate Site Inventory also contains a preliminary list of sites that the City will consider rezoning with a</p>

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	<p>However, I believe the current plan can be improved for both current and future city residents as well as making it more likely to meet HCD guidelines.</p>	<p>residential overlay to promote affordable housing developments within the City and conservative estimates of the potential number of units that could be constructed under the residential overlay. The Housing Element commits to refining Candidate Sites, the parameters of the residential overlay and other zoning changes to create sufficient capacity for residential development with a buffer. (See Program 1.)</p>
	<p>Problems with the R-Overlay</p> <p>The City seeks to reach its RHNA goal of 901 units, up from 184 units built in the last cycle, primarily via new a zoning overlay on the east edges of the city on farming and commercial land. Roughly 70% of the ~2200 units in the site inventory are slotted to be built here.</p> <p>The chosen area is far from downtown and is primarily commercial office space. This is problematic:</p> <ul style="list-style-type: none"> • Even though Carpinteria is a small city, these new residents won't be able to walk to do most of their errands, whereas they could if it was closer to downtown. Our beautiful city should be seeking to get as much walkable density as it can . • The city might not be Affirmatively Furthering Fair Housing by sequestering nearly all its planned higher density low income housing away from \$1 m single families homes and next to a mobile/manufactured home park and other lower-cost housing . On Zillow today, all of the housing options near the main R-Overlay area are ~\$550k, compared to \$1 m+ in the rest of the city • Tearing down in-use commercial for an out-of-the way development next to a freeway is a risky proposition. • Even with a 2x buffer on RHNA numbers, the city should provide explicit likelihood of development in its Site Inventory to show it feels confident that some of these units are going to get development. 	<p>The Housing Element proposes to consider rezoning of the Candidate Sites with a residential overlay based on the analysis in the Technical Report. The analysis suggests that the Candidate Sites are the most likely to have a realistic possibility of redevelopment based on, among other factors, the site conditions, existing uses, and property owner interest. The Candidate Sites Inventory further includes sites identified throughout the City, however, Candidate Sites in the areas proposed by the commenter are generally smaller in size to accommodate sufficient density to support affordable housing development. Moreover, the Housing Element explains that existing zoning presently allows for residential uses on all commercial and industrial zoned parcels with mixed use developments and in some cases residential-only development; thus many of the parcels in the downtown area of the City may be redeveloped with housing under existing zoning. The Housing Element further provides a conservative estimate of each parcel's development potential in the Site Inventory and Candidate Site Inventory based on past residential development patterns in the City.</p>
	<p>Unclear zoning guidance for the R-Overlay and Multifamily</p> <p>The city should clearly define objective, by-right standards for multi-family development. In the R-Overlay zone the city is relying on for the majority of</p>	<p>The Housing Element describes the City's permit process for a variety of types of residential development. The City is located entirely within the California Coastal Zone and processes</p>

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	<p>its site inventory, requirements are unclear and appear to be up for negotiation, driving up uncertainty in the development process and reducing the likelihood units get built at all, or at the density the city needs to hit its targets. The city states it "has provided incentives for developers to facilitate inclusionary requirements." It provides no explicit incentives and says it is all up to negotiation.</p> <p>FAR, lot coverage, and minimum lot size standards for the R-Overlay district are undefined. The city notes that in negotiations it "may include" some incentives but provides no guidance on how likely or what the possible maximums might be. This does not give much certainty to prospective developers who may wish to build there.</p> <p>The city could provide minimum guarantees with density bonuses, and allow developers to negotiate above and beyond that for especially high-quality projects.</p>	<p>some development (e.g., ADUs) through administrative coastal development permits consistent with applicable law.</p> <p>The Housing Element commits to evaluating development standards that promote the development of affordable housing. (See Program 1.)</p> <p>Further Program 6 commits the City to updating its local density bonus regulations to provide further certainty to developers.</p>
	<p>Reduce Parking and Height Restrictions</p> <p>The R-Overlay zoning code sets 30ft height limits and requirements of 1-2 parking spots per unit. The city would see more affordable housing developed at a faster pace if it relaxed these requirements .</p> <p>With height limits, the city has chosen to put the majority of units in a formerly commercial area. There are few existing resident's views that are blocked, and the area would be perfect for taller multi-family buildings. Taller buildings also would require smaller building footprints, giving developers flexibility to have more open space.</p> <p>The city notes that "Impacts of the parking standards on housing cost and supply are minimal." The state of California disagrees - it passed AB 2097 this year due to strong evidence that minimum parking requirements drive up building costs and contribute to climate change. If it is true, it is because the city's lot coverage requirements are so burdensome that parking is a drop in the bucket.</p>	<p>Program 1 commits to an evaluation of the appropriate building height limit to facilitate the construction of affordable housing at the densities needed to create the capacity for lower income housing development.</p> <p>The Technical Report (Section III.A) evaluates governmental constraints on residential development including parking requirements. Programs 3, 5, 6 and 9 address reducing parking requirements to accommodate residential development consistent with applicable law.</p>
	<p>Broaden to Downtown and RH-1 zones</p> <p>Lastly, I suggest the City look to where nearly all of the 77 in progress units it seeks to count towards its RHNA progress are - near the downtown commercial core and adjacent RH-1 areas. These are the areas people want to live, walkable to the beach, supermarkets, restaurants and other amenities. If the</p>	<p>The Site Inventory identifies that these sites near Linden and Carpinteria Avenues presently are zoned as commercial or industrial development with mixed use development to allow for residential use. The 77 in-progress units near the downtown commercial core and adjacent RH-1 areas further indicates</p>

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	<p>city believes full commercial parks are likely to be torn down to build dense affordable housing, it can easily apply the same logic to parcels that are going to be more desirable to be lived in. The city should explore zoning incentives for denser housing near Linden Ave and Carp Ave.</p> <p>Hurry Up Your Timing If my math and understanding of the law is correct, the city is cutting it very close to its deadline to have an approved housing element. With a 30-day public comment period starting Oct 10, and a 90-day review window by HCD, that leaves only 10 days to incorporate public feedback and have it be approved by the city before the Feb 15 deadline, and that is assuming HCD approves the first draft. Upon Feb 15 if Carpinteria doesn't have an approved housing element, in addition to losing homeless and affordable housing money, anyone can begin to submit projects under the Builders Remedy, which ignore local zoning. This is already starting to happen in fellow beach towns Santa Maria and Redondo Beach . Goleta, along with dozens of other municipalities, had their first draft rejected . Dozens are currently out of compliance. The city should swiftly review feedback and send a quality housing element to HCD.</p>	<p>that these types of sites presently have the capacity for residential development. The City considers preserving commercial uses as well as the development of residential uses in the downtown area through existing zoning; thus, the Candidate Site Inventory generally prioritizes other parcels for affordable housing.</p> <p>The City prepared the Housing Element through a public process consistent with the procedural requirements in state law. The remainder does not comment on the substantive aspects of the Housing Element.</p>
Carpinteria Valley Association (Oct. 17, 2022)	<p>In the draft update, under Program Category #1, the second goal listed is:</p> <p>“Maintain a jobs-housing balance or ratio within 0.75 to 1.25 range suggested by the Santa Barbara Association of Governments”</p> <p>Table I-9 lists the Employment of city residents and includes the statistic that the civilian employed population 16 years and over is 6,648 city residents. This is the number of people who live where work somewhere, not the number of jobs in the City.</p> <p>However, nowhere in this report can I find data on the number of jobs in the City of Carpinteria. Without that info, it is not possible to determine if the jobs-housing balance is within the 0.75 to 1.25 range. Therefore, it is impossible to make any evaluation about the second goal of Program Category #1. That data needs to be broken down by job sector so we</p>	<p>Table I-9 presents the Employment by Industry in Carpinteria and Santa Barbara County. The Santa Barbara Association of Governments set the allocation of residential units assigned to the City of Carpinteria through the regional housing needs assessment (RHNA) process, which considered, in part, the regional and local jobs-housing balance as a factor in allocating residential units. The “Candidate Opportunity Sites” in Table B-5 are included as potential sites to include in a residential overlay for affordable housing. The residential overlay would provide property owners with the option of constructing residential units on their property or continuing existing commercial and industrial uses. The City plans to further evaluate the</p>

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	<p>have some idea of income and what housing would be within reach for workers in each sector.</p> <p>Further, without information about the jobs-housing balance, critical information is missing for making the most important decision in this process: which of the sites listed in Table B-5 as "Candidate Opportunity Sites" should be selected to make up the shortfall shown in the Land Inventory Summary in Table B-1.</p> <p>If we are short on jobs, we must be very careful what commercial or industrial parcels we add a residential overlay to.</p> <p>We strongly urge you to ensure accurate data on both parts of the jobs-housing balance are available to you and to the public as soon as possible to appropriately inform the Housing Element Update.</p> <p>One last point to consider in selecting what parcels to add a residential overlay to: It is of paramount importance that we protect the urban boundary by maintaining transitional land uses between high density residential and agricultural lands. If we don't do that, we are inviting the County to show up with more inappropriate proposals to expand our urban boundary like they have done at the north end of Bailard Avenue.</p>	<p>Candidate Opportunity Sites through its rezone process and consider potential impacts to the City's jobs-housing balance, among other factors. The Candidate Sites Inventory further considers existing land uses, such as industrial and agricultural parcels, to identify and evaluate the viability of these potential sites for residential development by reviewing the relative age of the structure and considering vacancy rates and owner interest.</p>
<p>Eye of the Day, Inc. (Oct. 28, 2022)</p>	<p>We certainly support your efforts to overlay our property with high density residential use. What is of importance is the densities that will be allowed which I'm sure you understand. We don't want to get stuck or penalized for moving forward with an alternative development if mixed use residential does not work financially. We look forward to moving forward and communicating with your and Planning.</p>	<p>The proposed residential overlay in the Housing Element provides the opportunity for the development of higher density residential units. The criteria for higher residential use projects will be further evaluated as part of the rezone process for the residential overlay. Property owners also will continue to have the option to develop their property under existing or future zoning for their respective zone district.</p>
<p>RPG Pacifica (Nov. 15, 2022)</p>	<p>RPG Pacifica is the property owner of the vacant 8.46-acre lot located at 6380 Via Real, Carpinteria, CA, otherwise known as the Lagunitas property. As you are aware, we recently had been pursuing the construction of an entitled office project on the property. With the demand for office space continuing to evolve in a post-COVID world, it does not appear that there will be sufficient demand from the market to justify the development of the current entitled office project. We were excited, therefore, to learn of the City of Carpinteria' recent efforts to introduce a Housing Overlay for our property as well</p>	<p>The Housing Element was updated to reflect the property owner's interest in residential development for this site.</p>

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	<p>as other commercial/industrial areas within the City as part of its Housing Element Update.</p> <p>We wish to express support for the proposed Housing Overlay at densities of 20-24 units /acre or greater. We appreciate that the Overlay is not a mandate and would not result in any legal nonconforming issues for either existing or proposed commercial developments, but would allow a property owner the op to consider housing as a potential use of his or her property in support of the City's and State's goals to provide additional residential opportunities within the City of Carpinteria</p>	
Bryan Mimaki (Nov. 18, 2022)	<p>I am the owner of your Draft Housing Element Candidate Opportunity Site # 1, APNs 001-080-040, -002, and -030. My three parcels total approximately 15.8 acres, and are currently in avocado production. I appreciate your reaching out to inform me of the October 13th ZOOM webinar and the October 17th Special Joint Meeting of the Planning Commission and City Council. I wholeheartedly support the City's efforts to apply a residential only overlay on my property as it would allow a high density residential use should my agricultural operations cease to make sense financially. I look forward to continued communication as this process moves ahead.</p>	<p>The Housing Element was updated to reflect the property owner's interest in residential development for this site.</p>
Justin Klentner (Nov. 18, 2022)	<p>I am the owner of the Draft Housing Element Candidate Opportunity Site #17, APN 003-251-021, a nearly one acre parcel with a mixed commercial and low density residential split zoning designations. The site is currently used as an equipment rental yard, although I am exploring the potential of a mixed use residential and commercial redevelopment of the entire site. I totally support the City's efforts to apply a residential only overlay on my property as it would allow a much needed high density residential use in Carpinteria's downtown district.</p> <p>Without this overlay I don't see how we can ever get the housing needs that our community so desperately needs.</p>	<p>The Housing Element was updated to reflect the property owner's interest in residential development for this site.</p>
Bill Medel (Nov. 20, 2022)	<p>I have been following and have attended workshops for the proposed residential overlay zones for the City's housing update in the General Plan. My family has owned APN's: 004-039-007, 003-151-017 and 003-151-018 since the 1950's. The property is currently zoned commercial but is surrounded by residential neighborhoods which makes these parcels prime candidates for the proposed residential</p>	<p>The Housing Element was updated to reflect the property owner's interest in residential development for this site.</p>

Commenter	Comment	How this comment has been addressed
	<p>overlay zone. APN 004-039-007 is currently leased to an irrigation and landscape service company and APN's 003-151-017 & 003-151-018 contain our family home since 1955. While APN 004-039-007 allows for a mixed use residential and commercial development, the overlay residential zone would allow several options to create more downtown residential units.</p> <p>I strongly support the City's draft housing element to apply an overlay to those properties in the City's downtown commercial zone.</p>	
<p>Californians for Homeownership, YIMBY Law, California Housing Defense Fund (Jan. 20, 2023)</p>	<p>We are writing to express serious concerns about the City's failure to timely engage in the process of developing its revised housing element. Because the City cannot legally meet the deadline for adopting its sixth cycle housing element update, we may initiate litigation against the City on or shortly after February 16, 2023 to compel the City to comply with housing element law.</p> <p>We want to ensure that the City understands its obligations under state law. The City is required to adopt its sixth cycle housing element update by February 15, 2023. The City must also submit an initial draft to the Department of Housing and Community Development (HCD) "at least 90 days prior to adoption." Thus, in order to timely adopt a sixth cycle housing element, the City was required to submit a draft housing element to HCD by November 17, 2022. It did not do so.</p> <p>Because the City will not be able to lawfully adopt a sixth cycle housing element update by February 15, 2023, it will be immediately subject to litigation under Government Code Section 65750 et seq. Housing element litigation is given near-complete priority in the court system. If we are forced to litigate, in addition to being ordered to adopt a housing element on a short timeline,⁴ the City could also face a number of serious penalties. For example, the court could suspend permitting in the City,⁵ and it could judicially approve housing development projects within the City.⁶ The court could impose these penalties while the litigation is pending, even before reaching a final decision.⁷ And a successful plaintiff can obtain attorneys' fees under Code of Civil Procedure Section 1021.5.</p> <p>[Continued – see complete letter below.]</p>	<p>The City prepared the Housing Element through a public process consistent with the procedural requirements in state law. The remainder does not comment on the substantive aspects of the Housing Element.</p>

Commenter	Comment	How this comment has been addressed
<p>People's Self-Help Housing (Jan. 30, 2023)</p>	<p>I wanted to let you know how much we continue to appreciate you, your planning staff, the City Manager's leadership and the City's elected officials' support for affordable housing developed and operated by People's Self-Help Housing. Of all the 30+ jurisdictions we work with along the Central Coast region, the City of Carpinteria is a standout, when it comes to championing projects and supporting our residents' success. I was reflecting how the City has provided our multiple properties developed in the Carpinteria so many keys to their success. Most helpful have been development impact fees relief, processing our entitlement approvals in an expedited manner, supporting projects with permanent soft loans, passing through the City's CDBG and HOME allocations, and even donated surplus City land to develop additional units. We so appreciate your and the City's sincere and meaningful contributions to affordable housing!</p> <p>When you recently invited me to speak to your City Council on identifying the most critical aspects for promoting more affordable housing, including on which sites within the City could best accompany potential projects, it was clearly very impactful on the decision makers, as evidenced by their engagement and even recommendations for further sites they felt could be potentially added to your inventory. I was so impressed and grateful to be a part of that process. Thanks again for reaching out to us for that purpose.</p>	<p>The City appreciates PSHH support and looks forward to continuing our mutual successful efforts to produce affordable housing in Carpinteria.</p>
<p>Victor and Susan Schaff (Mar. 6, 2023)</p>	<p>I am Victor Schaff, resident of the City of Carpinteria and owner of the above referenced properties. The 6155 site is currently leased to S & S Seed Company which I founded and recently sold, and the 6175 site is vacant land Per the attached more detailed presentation, I hereby request that these properties be added to those included in the Residential Overlay of the City of Carpinteria (2023-2031) Draft Housing Element.</p> <p>While this specific request is directly related to and intended to enhance the Draft Housing Element, of significance is the fact that the current housing rental vacancy rate in Santa Barbara is a tight 1.7%, compelling evidence of an imbalance between supply and demand. This imbalance caused 2022 rental rates to increase by 9% with pressure for an even greater increase in 2023. Home sale prices</p>	<p>The Housing Element was updated to include this site in the Candidate Site Inventory based on the property owner's interest in residential development for this site and, in part, the property owner's development proposal. The Housing Element Technical Report further analyzes housing vacancy in Section I.B.2 and presents vacancy information in Table I-5.</p>

Commenter	Comment	How this comment has been addressed
	<p>increased by 13.2%, driven by a similar imbalance in supply and demand.</p> <p>As a long standing member of our community, I personally favor mandated construction of "affordable" housing as defined by the state, and will commit to a minimum of 20% "affordable" for any project we develop. Still a primary driving force to achieve general housing affordability is far supply to be in balance with demand.</p> <p>In contrast, as discussed in greater detail in the accompanying presentation, there is no demand in the market area for additional business park space. This will cause the 6175 site to remain vacant land, and when the S & S lease expires in two years on the 6155 site for it to potentially be empty buildings. I respectfully request your positive consideration of the above.</p> <p>[Continued – see complete letter below.]</p>	
TK Consulting (Mar. 20, 2023)	<p>City Housing Element</p> <p>Separate and apart from the County's housing need, the City must identify over 800 units of housing inside the city boundary. In a City that is mostly built-out, this is a challenge. However, opportunities do exist and should be encouraged.</p> <p>The City has proposed placing a residential overlay (R Overlay) across numerous parcels identified as underutilized. Unfortunately, the density range and realistic density range do not provide enough monetary value to encourage redevelopment of these properties. A calculation should be made on each identified parcel to demonstrate that the proposed density is economically feasible. This is especially true when considering affordable housing, which typically needs some sort of subsidy to exist.</p> <p>The City should also consider a wider range of densities and reduction in standards to allow those densities to be achievable.</p> <p>An example of a standard that effectively reduces density is the proposed 30' building height limitation. It is very difficult to achieve three story housing at a 30' height limitation. With 1' between floors and a ceiling height of 9', the roof could only be 1' high, which is impractical. We suggest a minimum of 36' building height.</p> <p>Lastly and possibly most important, placing an R overlay is a good important first step, but it does not</p>	<p>The Housing Element proposes to further refine the residential overlay as part of the rezone process to evaluate the potential range of densities and affordability requirements that would make use of the residential overlay feasible to construct affordable housing on the selected Candidate Sites (Program 1).</p> <p>Program 1 further contains a commitment to study the appropriate building height limit for the residential overlay to ensure that the selected Candidate Sites can construct housing development projects at sufficient densities to achieve the City's RHNA unit allocation.</p> <p>The proposed residential overlay is not anticipated to require a rezone or General Plan Amendment for housing development projects. The City's current residential overlay does not require a rezone or General Plan Amendment for projects within the overlay to develop residential units. The City will ensure that the proposed residential overlay does not require a General Plan Amendment and</p>

Commenter	Comment	How this comment has been addressed
	<p>remove the discretionary requirements of the City. These mostly notably include a Development Plan and General Plan Amendment. By not amending the General Plan's Land Use Element for the identified properties, a substantially higher bar is placed on the development of these properties. Furthermore, it would negate the opportunity to process an SB330 application.</p> <p>[See complete letter below.]</p>	<p>will amend other elements of its General Plan to ensure consistency, if required.</p> <p>The remaining letter does not comment on the substance of the City's Housing Element.</p>
Coastal Commission Letter (April 10, 2023)	<p>Amendments to the Zoning Code related to the R Overlay and application of the R Overlay to specific sites cannot become effective without amendments to the City's certified Local Coastal Program (LCP), following review and approval by the California Coastal Commission.</p> <p>The proposed zoning changes raise concern in regard to existing protections for priority land uses identified in the Coastal Act and in the City's existing certified LCP, specifically in regard to agricultural and visitor-serving commercial uses. Further, sites located in proximity to the Carpinteria Salt Marsh raise issues with flooding and other coastal hazards, particularly with anticipated sea level rise. Finally, potential sites that contain or are adjacent to creeks or other environmentally sensitive areas raise issue with regard to ESHA protection, water quality, and flooding hazards in consideration of sea level rise.</p> <p>As written, the revised Draft 2023-2031 Housing Element Update includes sites that the City identifies as candidates for zone change to apply the R overlay (allowing stand-alone residential development). Some of those candidate sites are zoned for and contain existing coastal agriculture. Conversion of agriculture to residential use in those cases would need to meet all of the LCP criteria for such conversion. Similarly, there are candidate sites that are currently developed with visitor serving uses or zoned for such use. Rezoning of those sites and</p>	<p>The City acknowledges that a Local Coastal Program (LCP) amendment is needed to amend the City's Zoning Code to implement Program 1 and other aspects of the City's Housing Element. The City will work expeditiously to submit an LCP amendment to the Coastal Commission.</p> <p>Appendix B of the Housing Element describes the City's existing site inventory and candidate rezone sites and includes an initial evaluation of those sites with respect to Coastal Act and the City's certified LCP's protections for coastal resources. The candidate sites were selected based on substantial evidence that these sites could be rezoned to realistically accommodate additional housing within the City without significant impacts to agricultural land, visitor serving commercial uses, environmentally sensitive areas and hazards associated with flooding and sea level rise. Please review the candidate site specific information in Appendix B for additional details. These candidate sites will be reviewed further, including by the California Coastal Commission, when the City processes its LCP amendment to implement Program 1 and other zoning amendments described in the Housing Element.</p>

Commenter	Comment	How this comment has been addressed
	<p>conversion to residential use will need to address the Coastal Act and LCP limitations on eliminating such high priority uses. Any conversions of agriculture or visitor serving uses will need to be supported by detailed analyses, based on substantial evidence, prior to the City's adoption of the future LCP amendment.</p> <p>We would like to request that, moving forward, the City staff coordinate closely with Commission staff prior to City Council adoption of an LCP amendment(s) to include any necessary changes agreed upon by our respective staffs prior to formal submittal of an LCP to the Coastal Commission.</p> <p>[See complete letter below.]</p>	<p>The City prepared the Housing Element through a public process consistent with the procedural requirements in state law. City staff met numerous times with Coastal Commission staff separately and with Coastal Commission staff and HCD staff together during its preparation of the revised draft Housing Element and anticipates continued coordination with Coastal Commission staff in the processing of the above referenced LCP amendment.</p>
Carpinteria Valley Water District (August 11, 2023)	<p>Carpinteria Valley Water District (CVWD) received a request from Ashley and Vance Engineering, Inc. regarding water and sewer volume analysis for a proposed 400 unit development at 5800 Via Real. CVWD inquired whether there was an active project for 5800 Via Real with the City of Carpinteria.</p> <p>[See complete letter below.]</p>	<p>While an application for development of 5800 Via Real has not been submitted to the city, this property is identified as Candidate Site 2 in the Housing Element to be considered for rezoning with the R Overlay to allow a 100% residential development with a minimum density of 20 units per acre. The site is currently zoned AG-10.</p>

**YIMBY
LAW****CALIFORNIA
YIMBY**

February 28, 2022

Policy Recommendations for 6th Cycle Housing Element

Dear Planning staff:

YIMBY Law submits this letter to share our policy goals and recommendations for the Policies and Programs section of your Housing Element. We appreciate the opportunity to participate in the Housing Element process.

The Policies and Programs section of the city's Housing Element must respond to data, analysis and findings presented in the Housing Needs section. We repeatedly see findings that housing prices are high, segregation exists, and there is a lack of housing for special populations, but the Policies and Programs don't respond to these findings or try to change outcomes. The overview of the city's housing environment should set the scene, and the policies and programs should explain what the city is going to do to fix it.

Our policy goals are as follows:

Affirmatively Furthering Fair Housing

1. Prioritize rezoning in high resource, historically exclusionary neighborhoods.

Many of the highest resource neighborhoods with the best access to jobs, good schools, and other amenities have histories of exclusion which are still reflected in their zoning. Cities should rezone to allow more housing opportunities in those neighborhoods, particularly those with low Vehicle Miles Traveled, as part of their

Housing Elements.

2. **Establish a strong tenant protection ordinance so that new housing benefits everyone.** Development should not permanently displace current residents. Housing replacement programs, temporary housing vouchers, right of return, and demolition controls will create stability for renters while allowing new homes to be built for new households and to accommodate the growth associated with RHNA. In your sites inventory and rezoning programs, you should prioritize development on sites with owner-occupied housing & commercial uses over those with existing rent-controlled apartments or other rental housing with lower income residents.
3. **Support homeownership opportunities for historically excluded groups.** Homeownership continues to be a path to building financial security and inter-generational wealth, which has been systematically denied to many Americans. As a society, we need to make this right by intentionally offering opportunities to communities who have been excluded. The housing element should identify opportunities to create a variety of for-sale housing types and create programs to facilitate property ownership among excluded groups.

Site Capacity

4. **Adequately plan for density.** Ensure that a site's density will accommodate the number of homes that are projected to be built. In addition, make sure height limits, setback requirements, FAR, and other controls allow for adequate density and the ability to achieve a site's realistic capacity. Housing will not be feasible if you have a high density paired with low height limits. This density should be emphasized around jobs and transit and should go beyond the Mullin density in those areas.
5. **Provide sufficient zoned capacity to accommodate all income levels, including a minimum No Net Loss buffer of 30%.** Not every site will be developed at maximum density during the eight-year planning period. Identify an ample amount of opportunity sites and zone the sites to accommodate lower-income housing types (usually a statutory minimum of 30 dwelling units per acre) to give the city the best chance at meeting its RHNA.

6. **Use data from the 5th Cycle to calculate the likelihood of development for your 6th Cycle site inventory.** Likelihood of development is a measure of the probability of an inventory site being developed during the planning period. The median likelihood of development across the state is 25%, meaning only one of every four sites will likely be developed during the planning period for the median city. Incorporating the likelihood of development into the zoned capacity will set the city up to successfully achieve their RHNA, making the housing element less of a paper exercise and more of an actionable, functional document.

Accessory Dwelling Units

7. **Commit to an automatic mid-cycle adjustment if ADU permitting activity is lower than estimated in the housing element.** We highly recommend complying with HCD's standards of using one of its "safe harbor" methodologies to anticipate future ADU production. However, if the city is optimistic about ADU growth, then creating an automatic mid-cycle adjustment will automatically facilitate alternative housing options (i.e., a rezoning program, removing development constraints, ADU incentives, etc.) if the city falls behind the estimated ADU production.
8. **Incentivize new ADUs, including those that are rent-restricted for moderate- or lower-income households or that are prioritized for households with housing choice vouchers.** Consider offering low- or no-interest loans, forgivable loans, impact fee waivers for ADUs that are 750 square feet or larger, allowances to facilitate two-story and second-story ADU construction, etc.

Zoning

9. **Allow residential to be built in areas that are zoned for commercial use.** There are a myriad of ways to do this, but a housing overlay is one common policy. Additionally, consider eliminating new commercial space in mixed-use developments where there is not a strong demand or there is otherwise a glut of commercial space that is unused or frequently vacant.
10. **Allow flexibility in inclusionary zoning.** Cities should require different percentages for different AMI levels. Additionally, we urge cities to incentivize land

dedication to affordable developers in order for market-rate developers to meet their inclusionary requirements. Avoid getting trapped into thinking that the affordable units must be “sprinkled throughout” the market-rate units, or require the market-rate units to look exactly the same as the affordable ones. This should be balanced against not locating all of the affordable units in one place and ghettoizing neighborhoods by creating or perpetuating racially concentrated areas of poverty.

Better Entitlement Process & Reducing Barriers to Development

- 11. Ensure that the city has a ministerial process for housing permitting, especially multi-family housing, and remove impact fees for deed-restricted housing.** A discretionary process for housing development creates uncertainty and adds to the cost of construction. For example, multi-family housing should not require a conditional use permit or city council approval unless the builder is asking for unique and extraordinary concessions. Right-sizing governmental constraints, entitlement processes, and impact fees will help the city successfully meet its RHNA.
- 12. Reduce parking standards and eliminate parking minimums.** Minimum parking requirements are a major constraint on housing, especially for lower cost housing types. They can cost in excess of \$30,000 per spot and can raise rents by as much as 17%, and eliminating them is particularly important for smaller & other spatially constrained sites. Consider adopting a parking maximum.
- 13. Cap fees on all new housing.** Most construction costs are outside the City's control, but reducing impact fees can demonstrate that a city is serious about building new housing. At a minimum, cities should delay the collection of impact fees until the issuance of the certificate of occupancy to reduce financial impacts on new housing and make the units cheaper by not asking the developer to carry impact fee charges or debt throughout the construction phase.
- 14. Provide local funding.** One of the largest barriers to building new affordable homes is the lack of city/county funds available to assemble sites, provide gap funding, and to pay for dedicated staff. Without new funding, especially at the local level, we will not be able to build more affordable homes. There are three

new revenue streams that should be considered: 1) **Transfer tax**, a one-time payment levied by a jurisdiction on the sale of a home, may be utilized to raise much needed revenue to fund affordable homes; 2) **Vacancy tax** may be collected on vacant land to convince landowners to sell their underutilized properties and be used to fund the construction of affordable homes; 3) **Commercial linkage** fees should be adopted or revisited for increases on new commercial developments.

We urge you to include these policies in your 6th cycle Housing Element.

Best regards,

Sonja Trauss

Executive Director

YIMBY Law

sonja@yimbylaw.org

Gray Panthers Santa Barbara Network



July 31, 2022

To Whom It May Concern:

OfficersPresident
Richard SolomonMembership V.P.
Janice KellerSecretary
Gail MarshallTreasurer
David Landecker**Directors**Richard
Appelbaum
Josephine Black
Marty Blum
Carol Keator
David Lebell,
MD
Susan Rose
Janet Wolf

As a policy, the Gray Panthers Santa Barbara Network supports housing options that are accessible, affordable and safe for all regardless of gender, health status, access needs, race or ethnicity or economic circumstance.

We ask you to prioritize older adults as a specific goal in your Housing Element planning.

- Define “senior housing” more clearly to include requirements for accessibility and access to services.
- Zone for more senior housing options to meet senior needs as they progress through the senior housing care continuum.
- Expand “by right” zones in which senior housing with services is permitted.
- In commercial zones, expand permitted uses for licensed residential care, with conditional use permits for independent living as a “by right” use.
- Provide regulatory incentives for builders by adding a regulatory “fast track” incentive for builders on senior housing projects.
- Assure needed senior housing is located appropriately to transportation options.

Housing Element Submittal
July 31, 2022
Page 2

Older Adults need housing that is accessible and built according to ADA and applicable housing legislation/regulations & specifications. Countywide, 31% aged 60 and over identify as having a disability.

The Gray Panthers Santa Barbara Network was incorporated as a nonprofit Public Benefit Corporation in 2020. Our membership has grown steadily since then and includes residents from all parts of Santa Barbara County. Our mission is to promote social and economic justice and oppose discrimination of all types.

Sincerely,

Richard Solomon
Chair

P.O. Box 1177 Carpinteria, CA 93014 | info@sbgraypanthers.org | EIN: 85-4402577

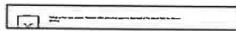
Brian Barrett

From: noreply@granicusideas.com
Sent: Friday, October 14, 2022 12:55 PM
To: Brian Barrett
Subject: New eComment for Special Joint City Council and Planning Commission Meeting

10/17/22 cc/PC

****EXTERNAL EMAIL****

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New eComment for Special Joint City Council and Planning Commission Meeting

Russell Ruiz submitted a new eComment.

Meeting: Special Joint City Council and Planning Commission Meeting

Item: 1. Public Release of the DRAFT 2023-2031 Housing Element Update

eComment: A lot to digest there. I look forward to seeing the Staff presentation at the meeting. As most of you know I am a lifetime Local and controlled growth advocate. I have literally been involved in local development all my Life. My father and grandfather were successful South Coast building contractors. I called myself a water and land use attorney. I have been involved in local planning matters since 1985. I have great confidence in our City Planning Staff but your Council has to give them direction on what the detail of our policies will be. I will keep this short for today but my current concern with these housing policies is the reduction or even elimination of parking requirements. In LA or Sacramento that may be appropriate planning but not in the City of Carpinteria. I hope you direct Staff to compromise our parking requirements to the minimum possible. Particularly in Carpinteria the argument that Downtown you can reduce or eliminate parking requirements for high density housing is a myth. People living Downtown in Carpinteria are not going to be walking to work in most cases. They will use cars and they need to have somewhere to park them other than on neighborhood streets where parking is already constrained. I am very concerned about what I heard from our Consultant on the Downtown T planning. High density small units in second stories of commercial properties with no required parking for those units. In my opinion, a very bad idea. That's it for today.

[View and Analyze eComments](#)

From: Edward Siegel <edwardjsiegel@gmail.com>
Sent: Sunday, October 16, 2022 5:44 PM
To: Steve Goggia <steveg@carpinteriaca.gov>; Public Comment <PublicComment@carpinteriaca.gov>
Cc: HousingElements@hcd.ca.gov; HousingElements@yimbylaw.org
Subject: Carpinteria Housing Element Feedback

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Dear Carpinteria City Council and Staff,

My name is Eddie Siegel. My family moved to Carpinteria when I was about 4 years old, and I lived there until I left for college. My childhood home, a perfectly normal 3bd house in Seacoast Village, has doubled in value since my parents sold it in 2014, according to Zillow. Not unrelatedly I, like all of my childhood friends, no longer live in Carp.

First, I want to applaud the small but mighty city staff for putting together a thoughtful, detailed, time-intensive document. The Housing Element provides over double the zoned capacity above the RHNA target in its site inventory which is much more than Goleta or Santa Barbara provided in theirs.

However, I believe the current plan can be improved for both current and future city residents as well as making it more likely to meet HCD guidelines.

Problems with the R-Overlay

The City seeks to reach its RHNA goal of 901 units, up from 184 units built in the last cycle, primarily via new a zoning overlay on the east edges of the city on farming and commercial land. Roughly 70% of the ~2200 units in the site inventory are slotted to be built here.

The chosen area is far from downtown and is primarily commercial office space. This is problematic:

-
-
- Even though Carpinteria is a small city, these new residents won't be able to walk to do most of their errands, whereas they could if it was closer to downtown. Our beautiful city should be seeking to get as much walkable density as it can.
-
-
-
- The city might not be Affirmatively Furthering Fair Housing by sequestering nearly all its planned higher density low income housing away from \$1m single families homes and next to a mobile/manufactured home park and other lower-cost housing. On Zillow today, all of the housing options near the main R-Overlay area are ~\$550k, compared to \$1m+ in the rest of the city.
-
-
-
- Tearing down in-use commercial for an out-of-the way development next to a freeway is a risky proposition.
- Even with a 2x buffer on RHNA numbers, the city should provide explicit likelihood of development in its Site Inventory to show it feels confident that some of these units are going to get development.
-

Unclear zoning guidance for the R-Overlay and Multifamily

The city should clearly define objective, by-right standards for multi-family development. In the R-Overlay zone the city is relying on for the majority of its site inventory, requirements are unclear and appear to be up for negotiation, driving up uncertainty in the development process and reducing the likelihood units get built at all, or at the density the city needs to hit its targets. The city states it *"has provided incentives for developers to facilitate inclusionary requirements."* It provides no explicit incentives and says it is all up to negotiation.

FAR, lot coverage, and minimum lot size standards for the R-Overlay district are undefined. The city notes that in negotiations it "may include" some incentives but provides no guidance on how likely or what the possible maximums might be. This does not give much certainty to prospective developers who may wish to build there. The city could provide minimum guarantees with density bonuses, and allow developers to negotiate above and beyond that for especially high-quality projects.

Reduce Parking and Height Restrictions

The R-Overlay zoning code sets 30ft height limits and requirements of 1-2 parking spots per unit. The city would see more affordable housing developed at a faster pace if it relaxed these requirements.

With height limits, the city has chosen to put the majority of units in a formerly commercial area. There are few existing resident's views that are blocked, and the area would be perfect for taller multi-family buildings. Taller buildings also would require smaller building footprints, giving developers flexibility to have more open space.

The city notes that "Impacts of the parking standards on housing cost and supply are minimal." The state of California disagrees – it passed AB 2097 this year due to strong evidence that minimum parking requirements

drive up building costs and contribute to climate change. If it is true, it is because the city's lot coverage requirements are so burdensome that parking is a drop in the bucket.

Broaden to Downtown and RH-1 zones

Lastly, I suggest the City look to where nearly all of the 77 in progress units it seeks to count towards its RHNA progress are – near the downtown commercial core and adjacent RH-1 areas. These are the areas people want to live, walkable to the beach, supermarkets, restaurants and other amenities. If the city believes full commercial parks are likely to be torn down to build dense affordable housing, it can easily apply the same logic to parcels that are going to be more desirable to be lived in. The city should explore zoning incentives for denser housing near Linden Ave and Carp Ave.

Hurry Up Your Timing

If my math and understanding of the law is correct, the city is cutting it very close to its deadline to have an approved housing element. With a 30-day public comment period starting Oct 10, and a 90-day review window by HCD, that leaves only 10 days to incorporate public feedback and have it be approved by the city before the Feb 15 deadline, and that is assuming HCD approves the first draft. Upon Feb 15 if Carpinteria doesn't have an approved housing element, in addition to losing homeless and affordable housing money, anyone can begin to submit projects under the Builders Remedy, which ignore local zoning. This is already starting to happen in fellow beach towns [Santa Maria](#) and [Redondo Beach](#). Goleta, along with dozens of other municipalities, had their first draft rejected. Dozens are currently out of compliance. The city should swiftly review feedback and send a quality housing element to HCD.

Thank you for your hard work and consideration,

Eddie Siegel



*Protecting the beauty & natural
resources of our valley since 1964*

City of Carpinteria
5775 Carpinteria Ave.
Carpinteria, CA 93013

Carpinteria Valley Association

PO Box 27, Carpinteria, CA 93014 CarpinteriaValleyAssociation.org

Oct 17, 2022

Re: Agenda Item #1: Public Release of the DRAFT 2023-2031 Housing Element Update

Members of the City Council and Planning Commission:

In the draft update, under Program Category #1, the second goal listed is:

“Maintain a jobs-housing balance or ratio within the 0.75 to 1.25 range suggested by the Santa Barbara County Association of Governments.”

Table I-9 lists the Employment of city residents and includes the statistic that the civilian employed population 16 years and over is 6,648 city residents. This is the number of people who live here who work somewhere, not the number of jobs in the City.

However, nowhere in this report can I find data on the number of jobs in the City of Carpinteria. Without that info, it is not possible to determine if the jobs-housing balance is within the 0.75 to 1.25 range. Therefore, it is impossible to make any evaluation about the second goal of Program Category #1. That data needs to be broken down by job sector so we have some idea of income and what housing would be within reach for workers in each sector.

Further, without information about the jobs-housing balance, critical information is missing for making the most important decision in this process: which of the sites listed in Table B-5 as “Candidate Opportunity Sites” should be selected to make up the shortfall shown in the Land Inventory Summary in Table B-1.

If we are short on jobs, we must be very careful what commercial or industrial parcels we add a residential overlay to.

We strongly urge you to ensure accurate data on both parts of the jobs-housing balance are available to you and to the public as soon as possible to appropriately inform the Housing Element Update.

One last point to consider in selecting what parcels to add a residential overlay to: It is of paramount importance that we protect the urban boundary by maintaining transitional land uses between high density residential and agricultural lands. If we don’t do that, we are inviting the County to show up with more inappropriate proposals to expand our urban boundary like they have done at the north end of Bailard Avenue.

Thank you,

Mike Wondolowski
President
Carpinteria Valley Association
mwondo@cox.net

Steve Goggia

From: Brent Freitas <bbf@eyeofthedaygdc.com>
Sent: Friday, October 28, 2022 11:39 AM
To: Steve Goggia
Cc: Jon Friedman
Subject: 4620 Carpinteria Avenue

****EXTERNAL EMAIL****

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Hi Steve. We certainly support your efforts to overlay our property with high density residential use. What is of importance is the densities that will be allowed which I'm sure you understand. We don't want to get stuck or penalized moving forward with an alternative development if mixed use residential does not work financially. We look forward to moving forward and communicating with you and Planning. Regards, Brent

Brent Freitas
President
Eye of the Day, Inc.

4620 Carpinteria Avenue
Carpinteria, Ca 903013

Phone: 805-566-6500 ext. 100
Cell: 805-895-3007



November 15, 2022

Steve Goggia
Community Development Director
City of Carpinteria
5775 Carpinteria Avenue
Carpinteria, CA, 93013

Via email: SteveG@carpinteriaca.gov

SUBJECT: 2023-2031 Draft Housing Element – Proposed Housing Overlay
Letter of Support (6380 Via Real, Carpinteria, CA)

Dear Mr. Goggia:

RPG Pacifica is the property owner of the vacant 8.46-acre lot located at 6380 Via Real, Carpinteria, CA, otherwise known as the Lagunitas property. As you are aware, we recently had been pursuing the construction of an entitled office project on the property. With the demand for office space continuing to evolve in a post-COVID world, it does not appear that there will be sufficient demand from the market to justify the development of the current entitled office project. We were excited, therefore, to learn of the City of Carpinteria's recent efforts to introduce a Housing Overlay for our property as well as other commercial/ industrial areas within the City as part of its Housing Element Update.

We wish to express our support of the proposed Housing Overlay at densities of 20-24 units/acre or greater. We appreciate that the Overlay is not a mandate and would not result in any legal non-conforming issues for either existing or proposed commercial developments, but would allow a property owner the option to consider housing as a potential use of his or her property in support of the City's and State's goals to provide additional residential opportunities within the City of Carpinteria.

Please let this letter serve as an indication of our support for the City's efforts to have its Housing Element (with the Housing Overlay) be certified by the California Department of Housing and Community Development as well as its implementation of any related Local Coastal Plan/ zoning changes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Leonard', written over a light blue horizontal line.

Steve Leonard
President

Cc: Troy White, *TW Land Planning & Development, LLC*

315 S. Coast Hwy 101, Ste U-12, Encinitas, CA 92024
www.rafpag.com

Steve Goggia

Subject: Carpinteria Candidate Site No. 1

From: bryan <ikamim@hotmail.com>
Sent: Friday, November 18, 2022 8:45 AM
To: Steve Goggia <steveg@carpinteriaca.gov>
Subject: Re: Carpinteria Candidate Site No. 1

Sent from my iPhone

Dear Mr. Goggia,

I am the owner of your Draft Housing Element Candidate Opportunity Site # 1, APNs 001-080-040, -002, and -030. My three parcels total approximately 15.8 acres, and are currently in avocado production. I appreciate your reaching out to inform me of the October 13th ZOOM webinar and the October 17th Special Joint Meeting of the Planning Commission and City Council. I wholeheartedly support the City's efforts to apply a residential only overlay on my property as it would allow a high density residential use should my agricultural operations cease to make sense financially. I look forward to continued communication as this process moves ahead.

Yours,

Bryan Mimaki

Steve Goggia

Subject: FW: Could you please forward this to the appropriate channels

From: Justin Klentner <justin@westernbuiltconstruction.com>
Sent: Friday, November 18, 2022 12:59 PM
To: Steve Goggia <steveg@ci.carpinteria.ca.us>
Subject: Could you please forward this to the appropriate channels

****EXTERNAL EMAIL****

CAUTION: This email originated from outside the City of Carpinteria. DO NOT OPEN attachments or CLICK on links unless you are sure they are safe. Remember, reputable vendors, banks, etc. will not ask you to disclose passwords or other sensitive information.

Dear Mr. Goggia,

I am the owner of the Draft Housing Element Candidate Opportunity Site #17, APN [003-251-021](#), a nearly one acre parcel with a mixed commercial and low density residential split zoning designations. The site is currently used as an equipment rental yard, although I am exploring the potential of a mixed use residential and commercial redevelopment of the entire site. I totally support the City's efforts to apply a residential only overlay on my property as it would allow a much needed high density residential use in Carpinteria's downtown district.

Without this overlay I don't see how we can ever get the housing needs that our community so desperately needs.

Thank you for your time.

Justin Klentner

November 20, 2022

Mr. Steve Goggia
Community Development Director
City of Carpinteria
5775 Carpinteria Avenue
Carpinteria, Ca. 93013

Via email: steveg@carpinteriaca.gov

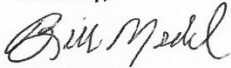
Re: Carpinteria Housing Element Candidate Opportunity Site #18

Dear Mr. Goggia:

I have been following and have attended workshops for the proposed residential overlay zones for the City's housing update in the General Plan. My family has owned APN's: 004-039-007, 003-151-017 and 003-151-018 since the 1950's. The property is currently zoned commercial but is surrounded by residential neighborhoods which makes these parcels prime candidates for the proposed residential overlay zone. APN 004-039-007 is currently leased to an irrigation and landscape service company and APN's 003-151-017 & 003-151-018 contain our family home since 1955. While APN 004-039-007 allows for a mixed use residential and commercial development, the overlay residential zone would allow several options to create more downtown residential units.

I strongly support the City's draft housing element to apply an overlay residential zone to those properties in the City's downtown commercial zone.

Sincerely,



Bill Medel
1095 Holly Avenue
Carpinteria, Ca. 93013
wemedelco@verizon.net



January 20, 2023

Dave Durflinger
City Manager, City of Carpinteria
Email: daved@carpinteriaca.gov

RE: Failure to Timely Engage in the Sixth Cycle Housing Element Process

Dear Mr. Durflinger:

YIMBY Law, Californians for Homeownership, and the California Housing Defense Fund are 501(c)(3) organizations devoted to using impact litigation and other legal tools to address California's housing crisis. We are writing to express serious concerns about the City's failure to timely engage in the process of developing its revised housing element. Because the City cannot legally meet the deadline for adopting its sixth cycle housing element update, we may initiate litigation against the City on or shortly after February 16, 2023 to compel the City to comply with housing element law.

We want to ensure that the City understands its obligations under state law. The City is required to adopt its sixth cycle housing element update by February 15, 2023.¹ The City must also submit an initial draft to the Department of Housing and Community Development (HCD) "at least 90 days prior to adoption."² Thus, in order to timely adopt a sixth cycle housing element, the City was required to submit a draft housing element to HCD by November 17, 2022. It did not do so.

Because the City will not be able to lawfully adopt a sixth cycle housing element update by February 15, 2023, it will be immediately subject to litigation under Government Code Section 65750 *et seq.* Housing element litigation is given near-complete priority in the court system.³ If we are forced to litigate, in addition to being ordered to adopt a housing element on a short timeline,⁴ the City could also face a number of serious penalties. For example, the court could suspend permitting in the City,⁵ and it could judicially approve housing development projects within the City.⁶ The court could impose these penalties while the litigation is pending, even before reaching a final decision.⁷ And a successful plaintiff can obtain attorneys' fees under Code of Civil Procedure Section 1021.5.

¹ Gov. Code § 65588(e)(3)(A).

² Gov. Code § 65585(b)(1).

³ Gov. Code § 65752.

⁴ Gov. Code § 65754.

⁵ Gov. Code § 65755(a)(1).

⁶ Gov. Code § 65755(a)(4).

⁷ Gov. Code § 65757.

Each of our organizations has a long track record of successful litigation against local agencies that violate state housing laws. Californians for Homeownership, in particular, has filed ten lawsuits in Southern California this year over violations of housing element law, including lawsuits against eight cities for failing to timely adopt housing elements. And all three organizations intend to seek strict enforcement of the deadlines for housing element adoption in the Bay Area, including through litigation if necessary. We assure you: this is not an empty threat.

But we are writing to offer the City an alternative to litigation. Our organizations will forego immediate litigation against the City if the City signs the acknowledgement provided below, without modification. If the City would like to take advantage of this compromise offer, please send the signed acknowledgement to housingelements@yimbylaw.org by February 14, 2023. Please do not respond with a summary of the reasons the City's housing element will be tardy; we are familiar with the full range of explanations, having engaged in this process for over a year in Southern California. If the City would like to avoid litigation, it can do so by providing a signed acknowledgement, not a letter explaining why its process has taken so long.

If you have any questions, please do not hesitate to reach out to us by sending an email to keith@yimbylaw.org, matt@caforhomes.org, and dylan@calhdf.org.

Sincerely,



Keith Diggs
YIMBY Law



Matthew Gelfand
*Californians for
Homeownership*



Dylan Casey
*California Housing
Defense Fund*

cc: Steve Goggia, Comm. Dev. Dir. (by email to steveg@carpinteriaca.gov)
Jena Shoaf Acos, Esq., City Attorney (by email to jacos@bhfs.com)
City Council (by email to Brian Barrett, City Clerk, brianb@carpinteriaca.gov)

ACKNOWLEDGMENT

The City of Carpinteria hereby acknowledges that it cannot timely adopt a sixth cycle revised housing element of its general plan within the deadline set forth in Government Code Section 65588, and that its housing element will therefore not be in substantial compliance with Article 10.6 of Chapter 3 of Division 1 of Title 7 of the Government Code, starting on February 16, 2023.

As a result, the City acknowledges that, starting February 16, 2023 and until such time as the City adopts a housing element that is substantially compliant with Article 10.6, it will be prohibited from rejecting any housing development project based on subdivision (d)(1) or (d)(5) of the Housing Accountability Act (HAA), Government Code Section 65589.5. The City acknowledges that this means that, unless another exception within subdivision (d) applies, the City is prohibited from using its general plan and zoning standards to reject an application that meets the affordability requirements described in subdivision (h)(3) of the HAA.

The public, including without limitation any applicant to develop any project involving residential units, may rely on this Acknowledgment as the City's binding commitment to comply with the provisions of state law described above. The City agrees that, should litigation arise regarding the City's decision on any such project that is the subject of an application or preliminary application submitted between February 16, 2023 and the City's adoption of a substantially compliant housing element, the City will be estopped from relying on subdivision (d)(1) or (d)(5) of the HAA.

DATED: _____, 2023

CITY OF CARPINTERIA

By: _____
[Signature]

[Name]

Its: _____
[Title]

From: Kenneth Trigueiro <kennethtrigueiro@pshhc.org>
Sent: Monday, January 30, 2023 4:39 PM
To: Steve Goggia <steveg@carpinteriaca.gov>
Subject: PSHH appreciates City of Carpinteria's ongoing support of affordable housing!

Hi Steve,

It was great to see you in the Joint Cities-County of Santa Barbara Affordable Housing Task Force Group last week. I wanted to let you know how much we continue to appreciate you, your planning staff, the City Manager's leadership and the City's elected officials' support for affordable housing developed and operated by People's Self-Help Housing. Of all the 30+ jurisdictions we work with along the Central Coast region, the City of Carpinteria is a standout, when it comes to championing projects and supporting our residents' success. I was reflecting how the City has provided our multiple properties developed in the Carpinteria so many keys to their success. Most helpful have been development impact fees relief, processing our entitlement approvals in an expedited manner, supporting projects with permanent soft loans, passing through the City's CDBG and HOME allocations, and even donated surplus City land to develop additional units. We so appreciate your and the City's sincere and meaningful contributions to affordable housing!

I wanted to update you too, on recent conversations we have had with the commercial developer who is proposing a new tourist serving project in the City. Though they had not contemplated providing any housing, much less onsite deed restricted affordable housing to serve lower-income earning households, they have now reached out to us for that purpose. We are now negotiating an agreement with them to develop a project on land they intend to carve out for that purpose. It's our understanding that this is a direct response to your encouragement of them to consider including affordable housing in their proposal,

though there is no housing requirement for them to do so! I think that's a testament to the City's intent to do all you can to encourage more affordable housing.

I'm also writing to you at this time since I know you are working on your Housing Element. When you recently invited me to speak to your City Council on identifying the most critical aspects for promoting more affordable housing, including on which sites within the City could best accompany potential projects, it was clearly very impactful on the decision makers, as evidenced by their engagement and even recommendations for further sites they felt could be potentially added to your inventory. I was so impressed and grateful to be a part of that process. Thanks again for reaching out to us for that purpose. As you continue your Housing Element update, perhaps it would be of value to share these comments with HCD reviewers. If so, please feel free to! I know Paul McDougall at HCD is familiar with our work, since we have been very active in the Central Coast region for over 50 years, developing over 3,000 affordable units for lower-income earning households over the years. We try to let HCD know who the model jurisdictions are who support affordable housing, whenever we have the opportunity. And the City of Carpinteria is definitely exemplary.



**People's
Self-Help
Housing**



Kenneth Trigueiro
CEO & President
1060 Kendall Rd
San Luis Obispo, CA 93401
Office (805) 540-2453

We build affordable *homes* with site-based *services* that offer *opportunities* to change lives and strengthen *communities* on the Central Coast of California.

Victor and Susan Schaff
2000 Cravens Lane
Carpinteria, CA 93013
805.331.4808



March 6, 2023

Planning Commission and City Council
City of Carpinteria
5775 Carpinteria Avenue
Carpinteria, CA 93013
Attn: Steve Goggia, Nick Bobroff

Re: 6155 and 6175 Carpinteria Avenue

Ladies and Gentleman:

I am Victor Schaff, resident of the City of Carpinteria and owner of the above referenced properties. The 6155 site is currently leased to S & S Seed Company which I founded and recently sold, and the 6175 site is vacant land. Per the attached more detailed presentation, I hereby request that these properties be added to those included in the Residential Overlay of the City of Carpinteria (2023-2031) Draft Housing Element.

While this specific request is directly related to and intended to enhance the Draft Housing Element, of significance is the fact that the current housing rental vacancy rate in Santa Barbara is a tight 1.7%, compelling evidence of an imbalance between supply and demand. This imbalance caused 2022 rental rates to increase by 9% with pressure for an even greater increase in 2023. Home sale prices increased by 13.2%, driven by a similar imbalance in supply and demand.

As a long standing member of our community, I personally favor mandated construction of "affordable" housing as defined by the state, and will commit to a minimum of 20% "affordable" for any project we develop. Still a primary driving force to achieve general housing affordability is for supply to be in balance with demand.

In contrast, as discussed in greater detail in the accompanying presentation, there is no demand in the market area for additional business park space. This will cause the 6175 site to remain vacant land, and when the S & S lease expires in two years on the 6155 site for it to potentially be empty buildings.

I respectfully request your positive consideration of the above.

Sincerely,

A handwritten signature in blue ink that appears to read "Victor Schaff".

Victor Schaff

RESIDENTIAL OVERLAY PRESENTATION- 6155, 6175 CARPINTERIA AVENUE

On behalf of Victor Schaff, owner of 6155 and 6175 Carpinteria Avenue in the city of Carpinteria, the undersigned proposes that these two properties be included among those designated within the city's HCD proposed Housing Element to be rezoned with a residential overlay zone.

The Properties

The two referenced properties are currently zoned M-RP, and are part of Bluffs Area II within the City of Carpinteria General Plan and Local Coastal Plan. 6175 Carpinteria Avenue is vacant and is 3.62 gross acres. It has never had structures built upon it. 6155 Carpinteria Avenue is 2.94 gross acres and contains approximately 48,000 square feet of structures which house the office and warehouse facilities of S&S Seed Company.

Victor Schaff, the owner of both properties, is a long-time resident of Carpinteria. He is the founder of S&S Seed Company. Within the last year he has sold the company to a third party and no longer has a role in the

company. The company now leases 6155 Carpinteria Avenue from Mr. Schaff, but will likely vacate the property in the near future.

City of Carpinteria Housing Element

The City of Carpinteria is in the process of seeking certification of its 2023-2031 State of California Housing Element. A first draft of the Housing Element has been submitted to State HCD, and the city is awaiting response. The city anticipates that it will not receive certification with this first draft, but rather will be required to make certain additions, modifications, and edits, and then submit a second draft for review.

One of the components of the current draft is a proposal that certain specific parcels within the city become the subject of a multi-family residential overlay zone (Residential Overlay). Several of these parcels are currently zoned M-RP, the same as the two subject properties. The owner of the two subject parcels hereby requests that the two subject parcels be included among those to be rezoned by adding them to the Residential Overlay.

Conceptual Project Diagram and Site Plan

As a tool for the city decision making bodies and for them to visualize the type of residential project which might be realized on these properties we have included herewith a diagrammatic site plan illustrating the possible site usage. We wish to emphasize that this site plan is not intended to be in any way architectural design or a proposed project, but simply to assist in the evaluation of the two sites becoming appropriate for the Residential Overlay.

The site plan illustrates a potential 130 residential units comprised of studio, 1 bedroom, 2 bedroom, and 3-4 bedroom townhome units. The intent is that all city zoning codes would be adhered to. In addition, a minimum 20% of the units will be affordable.

As illustrated on the site plan, one characteristic which is included, and we would welcome as a condition of the residential overlay zone, is significant photovoltaic solar generation. With relatively low two to three story structures considerable roof area as a percentage of building area can be achieved. Coupling this with west/southwest sloping roofs, much power generating

capacity is possible. The project could be a model example.

Please see the site diagram, axonometric, and cross sections for further detail.

Rationale for These Sites Becoming Residential

The City of Carpinteria is in the midst of the process of obtaining certification of its 2023-2031 Housing Element as mandated by the state. Inclusion of these two sites in the list of residential overlay sites could become a significant positive to the Housing Element.

The owner of the sites is a long-time local resident, has the financial capacity to embark on development of the sites, and, in principle, wishes to do so. He has complete individual authority regarding all actions taken regarding them.

The 6175 Carpinteria Avenue site was recently acquired by Victor Schaff. In recent years, and under previous ownership, considerable preliminary entitlement work was performed by various survey, geologic, environmental, traffic, etc. consultants per the direction

of Barton Myers Associates, architect, and The McGregor Company, developer, and in communication and cooperation with city staff. Much of this preliminary work might be applicable to future projects, both on this site and 6155, thus potentially saving future time and effort. Mr. Schaff has access to all this work and may choose to utilize these entities related to a future project.

The sites are ideally located for residential development. They are in Bluffs Area II of the city's Local Coastal Plan. They are immediately adjacent to the 53 acre Carpinteria Bluffs Nature Park offering a variety of recreational uses for residents, thus offering an ideal adjacency for residential use.

The sites benefit from highly desirable accessibility and transportation infrastructure to serve the local community and more regional workforce. Bus service along Carpinteria Avenue, dedicated bike lanes, and the immediately adjacent highway 101/1 corridor exist and are regularly being improved.

Currently, the two sites are the only missing links to the Carpinteria Bluffs Trail, forcing users to detour, having to walk along the edge of Carpinteria Avenue and across the

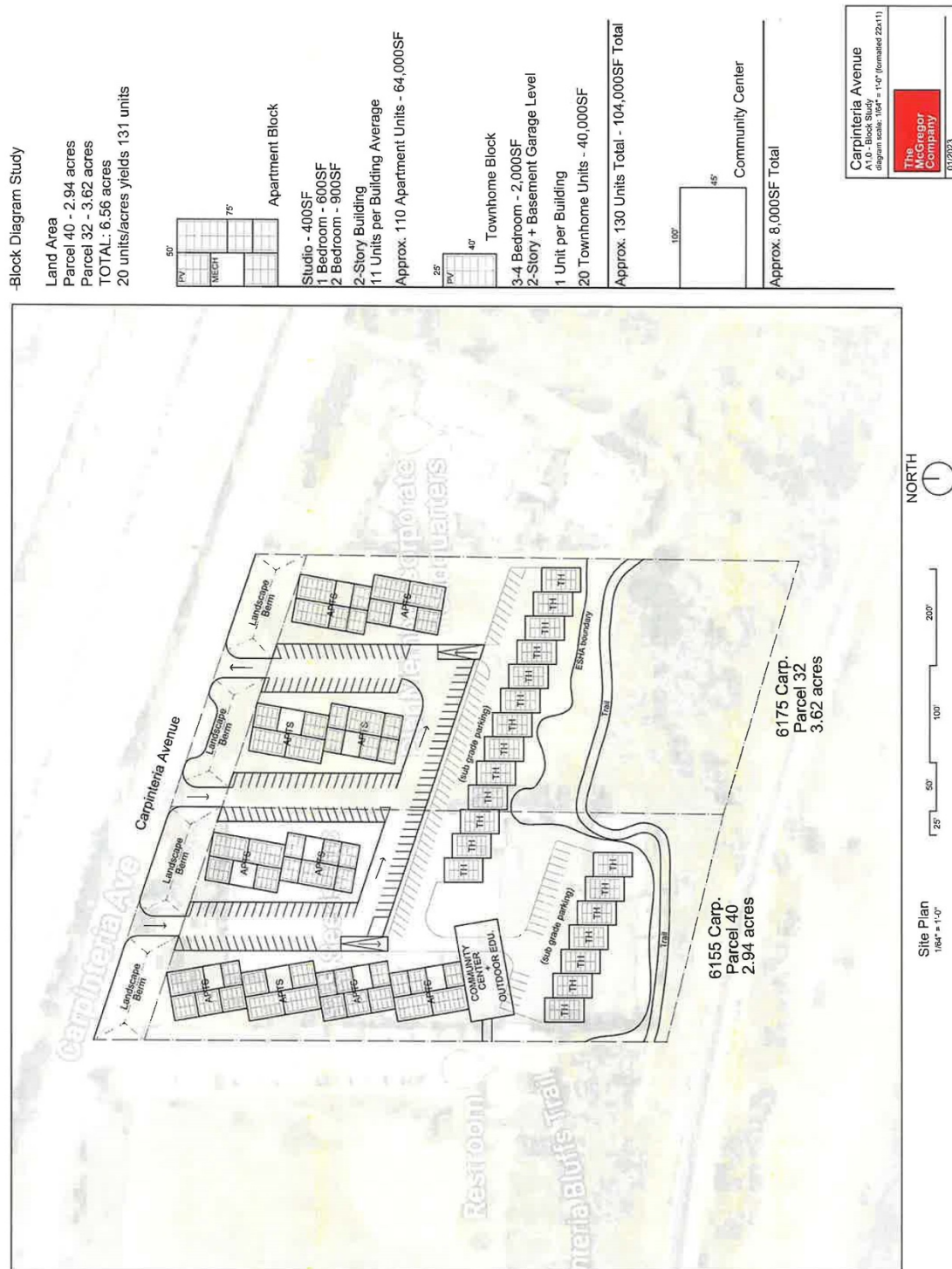
unimproved site. Any development of the sites would assure the inclusion of the trail in these locations, thus making the trail continuous.

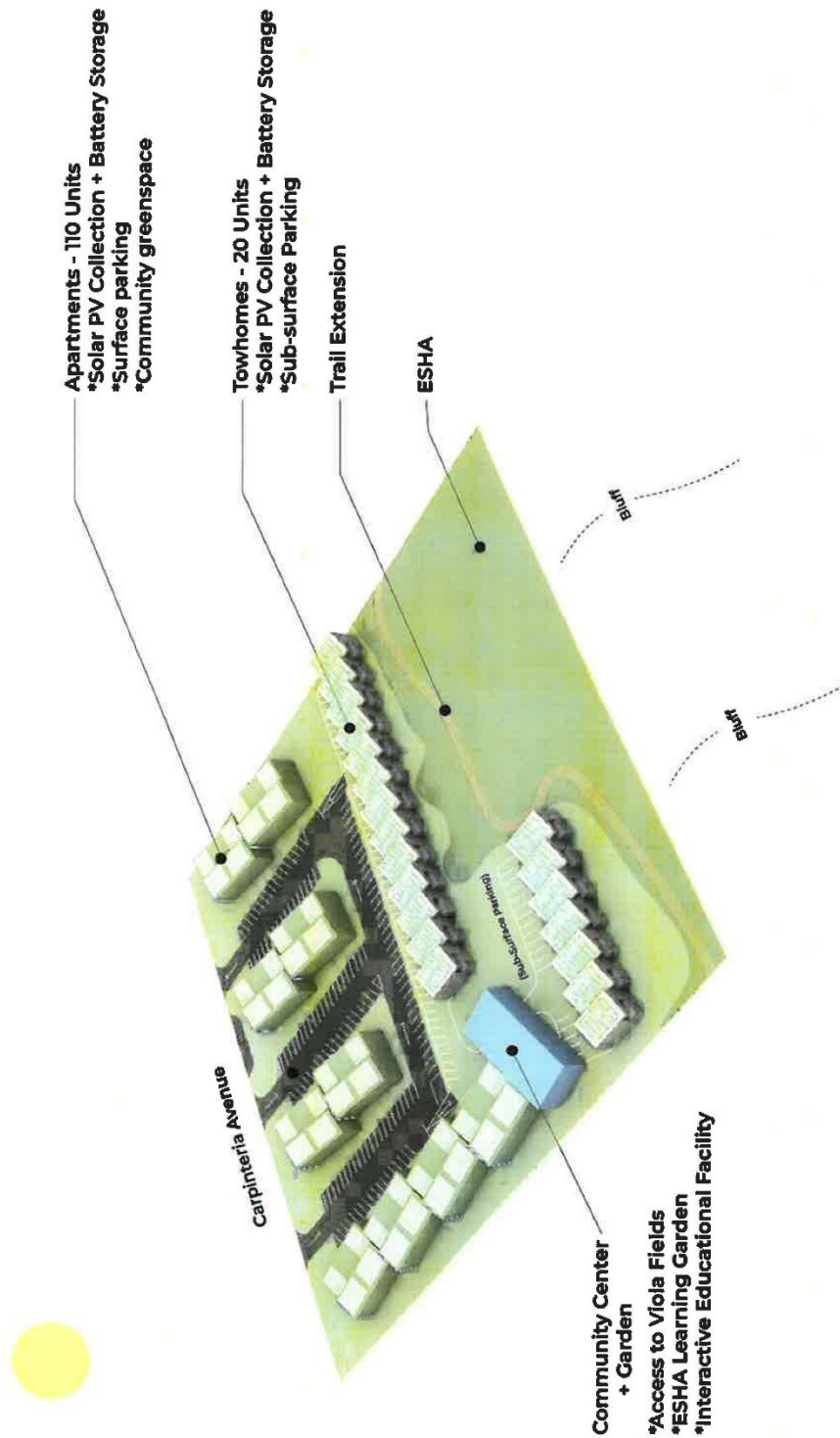
The sites, being located on the bluffs, are well above sea level, and as such will never be subject to the potential impacts of rising sea level.

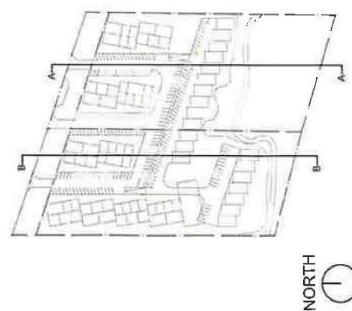
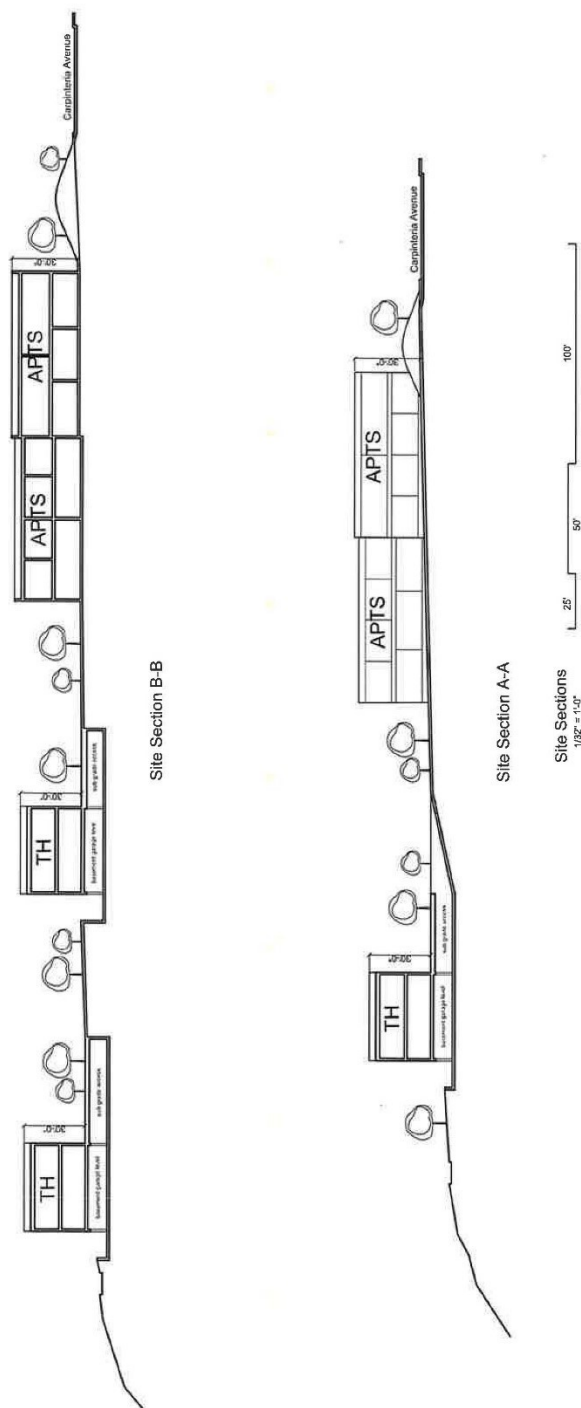
Given the immediate adjacency to the park, we would like to explore including within any development a community building which would be shared by the new residents and the community at large.

The to-date envisioned usage of these sites would have been “business park” similar to the existing buildings to the east. However, with major reduction in demand for such uses, partly driven by the pandemic, and with numerous companies now realizing their need for space has considerably lessened due to a much larger percentage of at-home and other out-of-office work, there is no need for additional business park space. Procore is a typical example, which continues to be a growing company, but rather than needing more space as they thought they would a few years ago, they now actually have had sub-lease space available.

Respectfully submitted,
The McGregor Company
By William T. McGregor









March 20, 2023

VIA EMAIL

Chairwoman Benefield & Planning Commissioners
5775 Carpinteria Ave.
Carpinteria, CA 93013

Re: Carpinteria Housing Element & Bailard Affordable and Workforce Housing

Dear Chairwoman and Planning Commissioners,

I am writing you on behalf of the Housing Authority of the County of Santa Barbara and Red Tail Multifamily Land Development, LLC. Our organizations have formed a public-private partnership to develop the property owned by the Carpinteria Unified School District at the end of Bailard and west of the Monte Vista Park site.

Background

The property was first considered for development over twenty years ago and was studied according to the CEQA requirements at the time. An EIR was prepared and certified for the development of a school site. Due to declining enrollment, it was determined the site was not needed and accordingly, the school site was deemed surplus. The school district is required by law to offer the property for sale via the Surplus Land Act to affordable housing concerns.

The property is currently zoned and land use designated for low density residential development. It is outside the urban rural limit line and within an EDRN area. Although the property is being farmed, the current planting of row crops only dates to the mid-1980s and most of the property is outside the Prime Farmland designation. Furthermore, we have completed a study utilizing the County's Thresholds of Significance and determine there would be a less than significant impact on farmland by developing this site.

We have collaborated with the County on the design and development. The plan has been presented to the Board of Architectural Review and Planning Commission. However, we still anticipate further interaction with County staff and various official bodies.

County Housing Need

The region's housing needs are real and well documented. Employers struggle to find workers and housing costs force employees to spend hours commuting from great distances. The unaffordability and lack of housing also has a dramatic impact on existing households. Without affordable entry level housing, young families are pushed from the area or forced to double up in multigenerational households. Moreover, the most recent Point In Time Count identified 22 individuals experiencing homelessness in Carpinteria.

The County has identify sites for nearly 4,400 units of housing in the South Coast region within this housing cycle. As the entirety of County property surrounding the City of Carpinteria is outside of the urban rural boundary, there are no opportunities for the County to identify residential development land in the Carpinteria area without impacting agricultural land.

Project opponents hold the urban rural boundary as a firm line that must never be crossed. This is unrealistic as there are no alternative developable properties to place the housing requirement.

TK Consulting, Inc. • 714.624.7539 • 31232 Old San Juan Road, San Juan Capistrano, CA 92675

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City Housing Element

Separate and apart from the County's housing need, the City must identify over 800 units of housing inside the city boundary. In a City that is mostly built-out, this is a challenge. However, opportunities do exist and should be encouraged.

The City has proposed placing a residential overlay (R Overlay) across numerous parcels identified as underutilized. Unfortunately, the density range and realistic density range do not provide enough monetary value to encourage redevelopment of these properties. A calculation should be made on each identified parcel to demonstrate that the proposed density is economically feasible. This is especially true when considering affordable housing, which typically needs some sort of subsidy to exist.

The City should also consider a wider range of densities and reduction in standards to allow those densities to be achievable.

An example of a standard that effectively reduces density is the proposed 30' building height limitation. It is very difficult to achieve three story housing at a 30' height limitation. With 1' between floors and a ceiling height of 9', the roof could only be 1' high, which is impractical. We suggest a minimum of 36' building height.

Lastly and possibly most important, placing an R overlay is a good important first step, but it does not remove the discretionary requirements of the City. These mostly notably include a Development Plan and General Plan Amendment. By not amending the General Plan's Land Use Element for the identified properties, a substantially higher bar is placed on the development of these properties. Furthermore, it would negate the opportunity to process an SB330 application.

Conclusion

The Bailard Affordable and Workforce Housing property is important and necessary for the County. This need is in addition to what the City is proposing to provide. Although some might argue better locations exists, a survey of available land, utilities and County planning requirements shows that no better locations are readily available. Attached is an aerial map of the City and its surroundings showing the relatively few units the County has placed adjoining the City of Carpinteria.

We are committed to continued pursuit of our SB330 Builder's Remedy application for the development of this property, but it is our sincere desire to incorporate the City of Carpinteria and local community in this process. We hope the City will engage our team in meaningful dialog on this project.

Should you have any questions, please feel free to call or email me at your convenience.

Sincerely,

Brent Little

Brent Little
Project Manager

CC: John Polanskey – Housing Authority of the County of Santa Barbara
Bob Havilcek - Housing Authority of the County of Santa Barbara
Ron Wu – Red Tail Multifamily Land Development, LLC
Tyler White – Red Tail Multifamily Land Development, LLC



STATE OF CALIFORNIA— CALIFORNIA NATURAL RESOURCES AGENCY

GAVIN NEWSOM, GOVERNOR

CALIFORNIA COASTAL COMMISSION

SOUTH CENTRAL COAST DISTRICT OFFICE
89 SOUTH CALIFORNIA STREET, SUITE 200
VENTURA, CA 93001-2801
VOICE (805) 585-1800
FAX (805) 641-1732
WWW.COASTAL.CA.GOV



April 10, 2023

Steve Goggia
City of Carpinteria Community Development Department
5775 Carpinteria Ave
Carpinteria, CA 93013
Email: steveg@carpinteriaca.gov

RE: Draft City of Carpinteria Housing Element Update

Dear Mr. Goggia:

Coastal Commission staff has reviewed the Revised Draft Housing Element and Technical Report for the Draft 2023-2031 Housing Element Update prepared by the City of Carpinteria (the City) dated April 2023, and we appreciate the opportunity to provide comments for your consideration.

The revised Draft 2023-2031 Housing Element Update is aimed to address State requirements for cities to facilitate increased housing production, particularly higher-density multi-family housing. Appendix B of the Technical Report provides the City's detailed sites inventory analysis, which outlines a deficit of sufficient sites to accommodate the City's RHNA allocation in the very-low- and low-income categories. As a solution, the City is currently proposing a zoning strategy that would allow the adoption of an "R Overlay" designation to facilitate future growth through the allowance of stand-alone residential (i.e., residential only) or a mix of residential and commercial uses at a density of 20 to 25 units/acre on parcels where stand-alone residential is not currently allowed.

As written, the overlay could be applied to certain sites identified in Section 3, Appendix B, of the Technical Report, which provides an inventory of sites that could be used to accommodate the City's present RHNA allocation as well as candidate sites for potential zoning amendments to increase capacity for new housing commensurate with future assignments. The candidate sites currently have zoning designations of Commercial, Visitor-Serving Commercial, Industrial/Research Park, Industrial, and Agricultural.

Amendments to the Zoning Code related to the R Overlay and application of the R Overlay to specific sites cannot become effective without amendments to the City's certified Local Coastal Program (LCP), following review and approval by the California Coastal Commission.

The proposed zoning changes raise concern in regard to existing protections for priority land uses identified in the Coastal Act and in the City's existing certified LCP, specifically in regard to agricultural and visitor-serving commercial uses. Further, sites located in proximity to the Carpinteria Salt Marsh raise issues with flooding and other coastal hazards, particularly with anticipated sea level rise. Finally, potential sites that contain or

are adjacent to creeks or other environmentally sensitive areas raise issue with regard to ESHA protection, water quality, and flooding hazards in consideration of sea level rise.

Several such policies are included for reference on page 4 of this letter.

The certified LCP contains specific objectives and policies (including the Chapter 3 policies of the Coastal Act) which require the protection of agriculture, and the protection of existing and the provision of new visitor-serving commercial uses throughout the City's jurisdiction. Objectives and policies associated with flexible land use allow for certain use changes, including the creation of residential overlays, but only where support for existing protections can be demonstrated.

The Coastal Act and Carpinteria LCP require the protection of coastal agriculture, including that the maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy. A conversion of agricultural land to other uses is only allowable under very limited circumstances, based on the detailed analysis of agricultural viability and other factors.

Further, among the most important goals and requirements of the Coastal Act and the LCP is the mandate to protect, provide, enhance, and maximize public access, with an important component of public access being the availability of lower cost visitor serving facilities, particularly lower cost3 overnight accommodations. This allows members of the public that live further from the coast, including those with lower income, to stay near the coast and gain access to the beach and ocean.

As written, the revised Draft 2023-2031 Housing Element Update includes sites that the City identifies as candidates for zone change to apply the R overlay (allowing stand-alone residential development). Some of those candidate sites are zoned for and contain existing coastal agriculture. Conversion of agriculture to residential use in those cases would need to meet all of the LCP criteria for such conversion. Similarly, there are candidate sites that are currently developed with visitor serving uses or zoned for such use. Rezoning of those sites and conversion to residential use will need to address the Coastal Act and LCP limitations on eliminating such high priority uses. Any conversions of agriculture or visitor serving uses will need to be supported by detailed analyses, based on substantial evidence, prior to the City's adoption of the future LCP amendment.

We would like to request that, moving forward, the City staff coordinate closely with Commission staff prior to City Council adoption of an LCP amendment(s) to include any necessary changes agreed upon by our respective staffs prior to formal submittal of an LCP to the Coastal Commission.

Such a collaborative process would allow our respective staffs to work together to most efficiently address and resolve any potential issues relating to consistency between future LCP amendments associated with the City's draft Housing Element and the coastal resource protections of the Coastal Act and certified LCP while minimizing the number of potential suggested modifications by the Commission that might be necessary during the formal certification process. We think there would be great value

to this process in terms of maximum transparency and local public input on any such amendments and streamlined processing of related LCP Amendment submittal(s).

Thank you very much for considering our comments. We would welcome an opportunity to meet with your department to further discuss LCP development and staff coordination opportunities.

Sincerely,

Sam Fearer

Sam Fearer
Coastal Program Analyst

cc: Nick Bobroff, City of Carpinteria Community Development Department (nickb@carpinteriaca.gov)
Barbara Carey, CCC District Manager (Barbara.Carey@coastal.ca.gov)
Steve Hudson, CCC District Director (Steve.Hudson@coastal.ca.gov)

Relevant Policies

Agricultural Uses

Coastal Act Section 30241 states:

The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:

(a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.

(b) By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.

(c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.

(d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands.

(e) By assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.

(f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b), and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.

Policy LU-1d of the LUP states:

Ensure that the type, location and intensity of land uses planned adjacent to any parcel designated open space/recreation or agriculture (as shown on Figure LU-1) are compatible with these public resources and will not be detrimental to the resource.

Objective LU-5 of the LUP states:

Maintain availability of agriculture, coastal-dependent industry and visitor-serving commercial development including hotels/motels, restaurants and commercial recreation uses.

Policy LU-5a of the LUP states:

The City shall continue to give priority to agriculture, coastal-dependent industry and visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation over residential, general industrial, or general commercial development.

Objective OSC-9 of the LUP states:

Encourage and promote open-field agriculture as an independent, viable industry to meet the needs of present and future populations and to preserve the Carpinteria Valley's rural, open space character.

Policy OSC-9d of the LUP states:

Encourage conservation of agricultural production areas.

Policy OSC-9e of the LUP states:

Avoid the conversion of agricultural land to nonagricultural land uses except where conversion meets the criteria established by Sections 30241, 30241.5, and 30242 of the Coastal Act.

Visitor-Serving Commercial Uses

Coastal Act Section 30222 states:

The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.

Objective LU-5 of the LUP states:

Maintain availability of agriculture, coastal-dependent industry and visitor-serving commercial development including hotels/motels, restaurants and commercial recreation uses.

Policy LU-5c of the LUP states:

The City shall prohibit the removal or conversion of visitor-serving development unless it will be replaced by development offering comparable visitor-serving opportunities.

Implementation Policy 1 of the LUP states:

A visitor serving zone district shall be maintained as a part of the city zoning regulations with the purpose of providing adequate opportunity for commercial development that

will serve visitors to the city. The visitor serving zone district shall apply to all visitor-serving commercial designated parcels.

Flexible Land Use and Zoning

Objective LU-6 of the LUP states:

Create flexible land use and zoning standards for general commercial and industrial parcels that allow opportunities for residential use to expand, as determined appropriate by the City, in response to changing needs relative to the jobs/housing balance locally and in the region, and as incentive toward the development of affordable housing.

Policy LU-6a of the LUP states, in relevant part:

... Mixed-use development shall not be permitted on parcels designated for commercial or industrial use unless it is found by the City to be compatible with existing and anticipated uses in the area surrounding the site.

Policy LU-6b of the LUP states, in relevant part:

The City may consider and permit residential use on a parcel or parcels not designated for such use under certain circumstances... Residential use shall not be permitted on parcels designated for commercial or industrial use unless it is found by the City to be compatible with existing and anticipated uses in the area surrounding the site... Residential Overlay shall be considered only after mixed use development, as allowed through policy LU-6a above, has been determined by the City to not be appropriate.

Policy LU-6c of the LUP states:

Parcels designated coastal-dependent industrial or visitor-serving commercial shall not be considered for mixed use or residential use, with the exception that second-story mixed use or residential use shall be allowed on visitor-serving commercial parcels in the Downtown Core District.

Subject: 5800 Via Real 400 new units
Date: Friday, August 11, 2023 at 12:05:34 PM Pacific Daylight Time
From: Brian King
To: Nick Bobroff
CC: Robert McDonald
Attachments: 2380_001.pdf

****EXTERNAL EMAIL****

CAUTION: This email originated from outside the City of Carpinteria. **DO NOT OPEN** attachments or **CLICK** on links unless you are sure they are safe. Remember, reputable vendors, banks, etc. will not ask you to disclose passwords or other sensitive information.

Hello Nick

I received the attached from Ashley and Vance for a proposed 400 unit development project at 5800 Via Real. This was the first I heard of this purposed project, was curious how active have they been with the City of Carpinteria for this project?

Thanks

Brian King, P.E.
Carpinteria Valley Water District
1301 Santa Ynez Ave.
Carpinteria Ca. 93013
805-684-2816x107



210 East Cota Street
Santa Barbara, CA 93101
(805) 962-9966
www.ashleyvance.com

Job No. 230678

August 9, 2023

Peter Grace
8665 East Duarte Road
San Gabriel, CA 91775

Re: 5800 Via Real – Sewer and Water Volume Analysis

To Whom It May Concern:

The purpose of this letter is to provide a summary of the volume analysis for the new sewer and water laterals servicing a proposed re-development project at 5800 Via Real. Design analysis for the sewer and water system is based on 2022 California Plumbing Code (CPC) requirements. (Only volume analysis for sewer and water)

Proposed Sewer Volume Analysis

The proposed development occupancy is classified as residential. The proposed complex includes 162 1b/1ba units, 132 2b/2ba units, 85 3bed/3ba units and 21 4 bed/3ba units with 2, 3, 4, and 5 occupants in each respective unit type for a total occupancy of 1165. The proposed complex includes lavatories, kitchen faucets, showerheads, and water closets for volume calculations. The total baseline sewer demand is 41,707 gallons per day for an annual demand of 46.72 acre feet. See sewer usage determination calculation for details.

Proposed Water Volume Analysis

The proposed development occupancy is classified as New Construction Residential. The proposed complex includes 162 1b/1ba units, 132 2b/2ba units, 85 3bed/3ba units and 21 4 bed/3ba units with 2, 3, 4, and 5 occupants in each respective unit type for a total occupancy of 1165. The proposed complex includes lavatories, kitchen faucets, showerheads, and water closets for volume calculations. The total baseline water demand is 33,249 gallons per day for an annual demand of 37.25 acre feet. See water usage determination calculation for details.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Sowards'.

Michael Sowards
Project Engineer



Jason J. Gotsis, P.E.
Principal Engineer

Attachments
Sewer Volume Determination
Water Volume Determination



Sewer Usage Determination

Type	Occupants/Unit	# of units	Total Occupants
1 bed/1 bath	2	162	324
2 bed/2 bath	3	132	396
3 bed/3 bath	4	85	340
4 bed/3 bath	5	21	105
TOTAL		1165	

Domestic Demand Fixture Analysis					
Fixture Type	Flow Rate ¹	Duration ¹	Daily Uses ¹	Occupant ^{2,3}	Daily Volume ⁴
Showerheads	2.5	8	1	1165	23300
Lavatory faucets residential	2.2	0.25	4	1165	2563
Kitchen faucets	2.2	4	1	1165	10252
Gravity water closets (F)	1.6	1	3	1165	5592
Total Daily Volume					41707

Domestic Usage Determination	
Total baseline sewer demand (gpd)	41707
Annual sewer demand (gal / year)	15223055
Annual sewer demand (AF / year)	46.72

1. Per 2019 California Plumbing Code Table L 701.2(1)

2. Residential occupancy per 2019 California Plumbing Code Table L 701.2(1) note 3 (2 for first bedroom 1 for each additional)

#N/A

4. Per 2019 California Plumbing Code L 701.2 [water use = flow rate x duration x uses x occupants]



Water Usage Determination

Type	Occupants/Unit	# of units	Total Occupants
1 bed/1 bath	2	162	324
2 bed/2 bath	3	132	396
3 bed/3 bath	4	85	340
4 bed/3 bath	5	21	105
TOTAL		1165	

Domestic Usage Fixture Analysis					
Fixture Type	Flow Rate ¹	Duration ¹	Daily Uses ¹	Occupant ^{2,3}	Daily Volume ⁴
Showerheads	2.0	8	1	1165	18640
Lavatory faucets residential	1.5	0.25	4	1165	1748
Kitchen faucets	1.8	4	1	1165	8388
Gravity water closets (F)	1.3	1	3	1165	4474
Total Daily Volume					33249

Domestic Usage Determination	
Total baseline domestic water use (gpd)	33249
Annual domestic water use (gal / year)	12135922
Annual domestic water use (AF / year)	37.25

1. Per 2019 California Plumbing Code Table L 402.1

2. Residential occupancy per 2019 California Plumbing Code Table L 701.2(1) note 3 [2 for first bedroom 1 for each additional]

#N/A

4. Per 2019 California Plumbing Code L 701.2 [water use = flow rate x duration x uses x occupants]

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