



County of Santa Barbara Planning and Development

Lisa Plowman, Director
Jeff Wilson, Assistant Director
Steve Mason, Assistant Director

December 15, 2020

Santa Barbara County Association of Governments (SBCAG)
260 North San Antonio Road, Suite B
Santa Barbara, CA 93110

Sent via email to info@sbcag.org

Subject: SBCAG December 17, 2020, Hearing Agenda Item No. 8 – Regional Housing Needs Allocation (RHNA) Methodology

Dear Honorable SBCAG Board of Directors:

The purpose of this letter is to express the Planning and Development Department (P&D) staff's support for SBCAG staff's recommendation regarding the RHNA methodology that SBCAG should propose to the Housing and Community Development Department (HCD) (SBCAG December 17, 2020, Hearing Agenda Item No. 8).

We appreciate the opportunity that SBCAG staff afforded us in developing the recommended RHNA methodology and the collaboration among the local jurisdictions throughout the process. The County occupies a unique position with regard to the development of the RHNA given that we are the only participating jurisdiction that occupies both the North County and the South County subregions as defined in the recommended RHNA methodology [SBCAG December, 17, 2020, Hearing Agenda Item No. 8 Staff Report (SBCAG Staff Report), p. 1)]. As such, the County is the only local jurisdiction that must address the unique jobs/housing balance challenges experienced in both subregions.

P&D staff used the following two objectives to identify our preferred methodology when considering the multiple technical options that SBCAG staff presented to the working group and Transportation Planning Advisory Committee (TPAC):

- (1) the degree to which each option would further the five RHNA objectives set forth in § 65584(d) of the State Government Code (SBCAG Staff Report, p. 3); and
- (2) the option that goes the furthest in addressing the jobs-housing imbalance which is the most severe land use challenge currently facing this region (SBCAG Staff Report, p. 2).

There is no single methodology that furthers all of the objectives set forth in § 65584(d) of the State Government Code; consequently, any methodology that SBCAG recommends to HCD will require trade-offs between these at-times competing objectives. However, P&D staff found the recommended RHNA methodology to be the best option for the following reasons:

- The recommended RHNA methodology would most directly address the regional jobs-housing imbalance (SBCAG Staff Report, pg. 2 and 4).
- With regard to correcting income disparities throughout the region, the recommended RHNA methodology most expeditiously works towards parity (SBCAG Staff Report, pg. 2-4).
- The recommended RHNA methodology would provide the largest shares of housing to the jurisdictions with the highest housing costs (SBCAG Staff Report, p. 3).
- The recommended RHNA methodology directly complements the Sustainable Communities Strategy (SCS), promotes infill development, and is consistent with the resource protection policies and regulations of the County's Comprehensive Plan (e.g., Agricultural Preserve/Williamson Act Program) (SBCAG Staff Report, pg. 3-4).

P&D believes that the recommended RHNA methodology results in the most equitable and fair approach, and goes the furthest in optimizing the balance in trade-offs between the objectives described above. Therefore, P&D encourages the SBCAG Board of Directors to take SBCAG staff's recommended actions set forth in the SBCAG Staff Report (p. 1).

If you have any questions about this recommendation, please contact me at 805-568-2086 or lplowman@countyofsb.org, or Dan Klemann, Deputy Director, Long Range Planning Division, at (805) 453-4803 or dklemann@countyofsb.org.

Sincerely,



Lisa M. Plowman, Director, P&D

c: Mona Miyasato, CEO, County of Santa Barbara
Barney Melekian, Assistant CEO, County of Santa Barbara
Darcel Elliot, Chief of Staff, First Supervisorial District
Chris Henson, Chief of Staff, Second Supervisorial District
Jefferson Litten, Chief of Staff, Third Supervisorial District
Bob Nelson, Chief of Staff, Fourth Supervisorial District
Cory Bantilan, Chief of Staff, Fifth District
Mike Becker, SBCAG
Dan Klemann, Allen, Bell, and Jessi Steele, Long Range Planning Division