

**RESPONSE OF
ALLIED NEIGHBORHOODS ASSOCIATION
TO:**



This "Statement of Shared Principles" currently being promoted appears to be one faction's version of what the City's housing and development policy should be.

Our criticism of it has little to do with goals and objectives, all to do with the strategies and reality.

Their "statement" represents, in essence, a restatement of the current "conventional wisdom" regarding housing, transportation and development. In our view it is a vision that, in its specifics and on close inspection, has limited application to Santa Barbara's unique circumstances.

Many of us, who represent a broad spectrum of Santa Barbara residents seeking to preserve the rare and fragile qualities of this City, have been seeking to persuade policy makers of an easily obscured truth: much of this "conventional wisdom" simply is inapplicable to this unique city! As any medical specialist will tell you, the "standard treatment" may be contraindicated for a patient of unique circumstance. It may be counterproductive and extremely harmful. The same is true with unique communities, and few can deny Santa Barbara's uniqueness.

We question the titling of this tract as "shared principles". We certainly take issue with many of them, and we are anything but a fringe faction out of tune with this City's mainstream. Contrary to its implications, most of us were never given an opportunity to question or express contrary views before this document was circulated for endorsements. Its reasoning, we feel, is subtly seductive and appealing, as it purports to develop a "compromise" position between groups that have potentially incompatible objectives (community preservationists vs. developers and housing

advocates). In this, we feel, it fails. This failure is demonstrated by the fact that at least three major environment-friendly groups, initially invited to endorse the HOT principles, declined to do so (Citizens Planning Association, Environmental Defense Center, and League of Women Voters).

The “HOT Statement” purports to represent a shared, compromise view – a reaction to conflicting opinion regarding development pressures in the community. An earlier circulated version of this document claimed that this “caused us to come together and seek a common ground”. That “common ground” touted concessions to our “building and development community”.

We question whether this community’s policy makers have an obligation to make concessions to the “building and development community” any more than we owe concessions to, say, our petroleum, automotive, or any other particular industry.

The premise of the “HOT Principles” is that development of new dense, in-town housing (“H”) will facilitate the preservation of open space (“O”) as well as transportation solutions (“T”). This glib assumption, seductive in its apparent symmetry, is one that deserves scrutiny.

Below, following excerpts from their document we offer our caveats to the propositions and proposals put forth in this “Statement of Shared Principles”.

A group drawn from environmental and social justice organizations and the development community has held a series of meetings and has agreed that Housing, Open space and Transportation (HOT) issues are intimately related and require planning, program development and implementation to account for that linkage holistically.

(REPLY): “Holistically” is what community planning is all about. But what it requires are not proposals for urban ills that qualify as viable solutions simply because they have a ring of plausibility. We, the residents who will be subject to the effects of these proposals, demand a higher standard. We require of our local government a measure of clear and convincing evidence that the proffered “cures” will work as prescribed, and not result in so many unintended consequences as to render them useless or counterproductive.

With this viewpoint, we apply a discerning eye to what is proposed in this document.

We believe...

Housing – its creation and its lack– is both an environmental and social issue. Residential development inside urban areas, within urban limit lines, reduces development pressure on agricultural land and environmentally sensitive habitats;

(REPLY): This “conventional thinking” consists of a “smart growth” tenet that says that concentration of development within the urban confines will result in a reduction of development pressure on the outlying areas. This tenet may be valid in most places, where development pressure is limited and finite, so that the shuffling of development to one place will displace it from the other. But the South Coast is subject to *infinite* development pressure. (“Infinite” is no hyperbole; evidence from similarly desirable locales easily documents the point.) The whole world seems to want a piece of this special place. No matter how much development we allow in town, the appetite for “developing” our outlying, open spaces will not be sated. The only thing that can preserve them is political will and resolve; faulty application of “conventional thinking” should not be used as rationale for over-development of our special and fragile in-town urban environment.

Open space availability is affected by land use decisions made in relation to planning for housing and transportation; and

Transportation planning must be done in relation to where people live and work. Creating workforce housing near or within job centers reduces congestion along existing traffic corridors and helps protect the environment.

(REPLY): This piece of “conventional wisdom” is predicated and dependent upon some huge, very shaky assumptions.

It assumes that the people living in the “housing near or within job centers” will in fact work at those jobs that happen to exist in the “job center”, and either walk to them or take alternative transit. That is a huge leap! Is downtown Santa Barbara the kind of “job center” that will support the many who are expected to be drawn to live within these in-city housing developments? Will those residents necessarily work there? Who says?

Might many others just as likely be lured to downtown Santa Barbara living, with little relation to where they “work”? Are we willing to support a bureaucratic apparatus to insure that the units are perpetually inhabited by local workers? Is it feasible? And who says that enough people living in proximity to “traffic corridors” or transit nodes will use that transit - as opposed to the car - to actually “reduce congestion”? Can anyone point to a single example in the developed world where this transformation has successfully taken place *where car use hasn’t first become nearly impossible*? And if the congestion did clear up, what would keep people from going back to their cars? (Let’s be realistic and at least consider the possibility that – in spite of our “traffic” complaints – our congestion is far from reaching the level where public transit has broad appeal and economic viability, much less the potential for *reducing* that congestion.) Changing behavior patterns and personal choices (especially those perceived as personal “freedoms”) has never been a strong suit of local government.

We believe housing, open space and transportation are basic necessities in a healthy community. To achieve them, we support the following set of principles, policies, and legislation drawn primarily from the Ahwanee, Home Builders Association, SB CAN, and South Coast Livable Communities principles.

In developing these principles, our ability to reach consensus was enhanced by the participation of the following individuals: Ada Babine, Vera Benson, Jeff Bermant, Jerry Bunin, Jackie Campbell, Tom Coalson, Dave Davis, Dick Flacks, Mickey Flacks, Connie Hannah, Chris Henson, Jay Higgins, Linda Krop, David Landecker, Jon Martin, Mary O’Gorman, Pat Saley, Naomi Schwartz, Courtney Seeple, Scott Smith, Jeremy Tittle, Michael Towbes, Brian Trautwein and Craig Zimmerman

(REPLY): The phrase “Our ability to reach consensus was enhanced” strikes us as an arcane and obscure piece of quasi-endorsement language – right up there with the statement (in the endorsement statement, *infra*): “Organizational endorsement of this Document indicates a joining of consensus around this statement.”

An earlier circulated version of this document listed organizations with which the above-listed individuals are affiliated, implying endorsement by those organizations. The omission of those organization names here we hope will serve to negate any such implications.

Policies & Planning

a. **A top priority** - South Coast governments should make the creation of economically viable and environmentally respectful affordable and workforce housing a top priority.

(REPLY): “Top priority”? This “HOT Statement” opened with recognition of a “holistic linkage”. Missing here is an enumeration of other “top priorities” with which housing development of the type and magnitude being promoted here would, to some degree, compete.

b. **Regional cooperation** - South Coast governments, including special districts, should cooperate on a regional basis to meet community housing, open space and transportation needs and seek to coordinate housing development, economic development, open space preservation, transit planning and siting of community facilities near transit routes, jobs and schools.

c. **Transfer development rights** - The region’s governments should develop programs that transfer development from rural lands and significant urban open spaces – across community borders, if need be – to urban infill sites in order to provide housing in appropriate locations, reduce commutes and preserve open space.

(REPLY): Transfer of development rights from significant open spaces may very well provide a realistic assurance of preservation of those spaces (which simply allowing increased urban development will not). Limiting inner-city development, of the type being proposed by this “HOT Statement”, to cases of transfers of development rights may be something for the city to consider.

d. **Local jobs-housing balance** - Each geographic region of the county should strive to create and maintain a jobs-housing balance to minimize traffic congestion, reduce the need for long-distance commuting, avoid sprawl and preserve open space.

(REPLY): This is all very nice sounding and idealistic, but what uniquely attractive place (or any place, for that matter) can anyone identify that has been able to even approach attainment of this state of bliss? Proposals and policies advanced in the quest of such elusive goals must be evaluated with a very skeptical and pragmatic eye. (Example: complicating the quest for a jobs-housing balance, Santa Barbara is a magnet for enterprising new residents who arrive here independent of the local job market or availability of commercial space – a phenomenon that is almost impossible to “plan” for within conventional “jobs-housing balance” models.)

e. **Approval of housing projects** - To move toward a jobs-housing balance, South Coast governments should approve projects that propose meaningful amounts of new affordable and workforce housing, provided that they comply with environmental and community standards. We cannot build our way out of a high-cost housing market, but we can improve the availability of housing that is affordable and near jobs and commercial centers.

(REPLY): We wholeheartedly agree that we can’t build our way out of high-cost housing. But, by any definition, the attempt to provide “meaningful amounts” of new affordable workforce housing would mean a whole lot of

new housing. And just how is that much new housing going to be compatible with environmental constraints or traditional Santa Barbara “community standards”? (Be reminded that our current General Plan establishes a maximum density of 12 units per acre as our basic “community standard”).

f. **Long-term affordability** - Price restrictions on affordable housing should be maintained to the legal maximum. Governments should provide sufficient resources to manage, monitor, and enforce such housing agreements.

(REPLY): Those “resources to manage, monitor, and enforce such housing agreements” translate into taxpayer funded bureaucratic apparatus. Enforcement of agreements that are intrinsically rife with incentive to cheat comes at a price (the County’s recent problems in this area serve as a reminder). If we are to expand local government, it should be to do something positive, not monitor new problems of our own creation.

g. **General and Community Plans** - Local governments should designate and zone adequate land to meet a community’s or region’s housing, open space and transportation needs and incorporate them into their General and Community Plans at least every 10 years so the public, home builders and government know where new growth, infill and redevelopment will occur. Under State law, Housing Elements must be updated every five years to assure that proper planning is utilized to meet regional housing needs.

h. **Community input** - Community input into the General and Community Plan process should be maximized.

(REPLY): Lets make sure to really and effectively “maximize community input” – as by making sure that the General Plan Update process is a genuine collaborative undertaking between citizens and city officialdom.

i. **Adequate infrastructure** - Infrastructure and development are linked. New housing should become a basis for neighborhood and community improvement. It must include adequate infrastructure – police, fire, water, sewer and schools -- and be part of a comprehensive approach to community development.

(REPLY): Lest we forget: all the proposed new housing is going to require us to pony up for the required “adequate infrastructure”. Remember the dictates of “Living Within Our Resources”? Housing requires hefty supporting resources; that housing development does not “pay it’s own way” toward the infrastructure needs it generates has been a widely appreciated truth for decades.

j. **Transportation** - Recognizing that some commuting will likely always be with us, we support the development of energy-efficient methods of mass transportation, like commuter buses, trains, ferries, etc. The existing MTD system should be developed and expanded to provide the service that will reduce private automobile use on the South Coast.

(REPLY): It bears repeating: We have absolutely no credible evidence that people will be induced to use public transit before the point is reached where

traffic makes car use simply intolerable – much less evidence that public transit will *reduce* sub-crisis level traffic! Santa Barbara is far from crisis level traffic. Plus, whence the assumption that all forms of public transit are *entirely benign* as far as undesirable side effects? For example, would you want a bus stop in front of your house (remember, many of our transit corridors are residential streets), or a BART style station and parking lot on your block?

k. **Process efficiency** - While not impairing the public's right to participate in that process, the development review process should be made more efficient and less time consuming, particularly for infill, affordable and workforce housing, public transit and open space projects that meet General Plan and Community Plan goals.

(REPLY): “More efficient” (read: quicker and easier)? And “particularly for the infill projects being promoted? Aren’t these the kind of projects – that bump up against other community priorities (like urban community preservation) – that require *more* vigilant and thorough evaluation and review, not less?

An earlier promoted publication of this “HOT Statement” (omitted from this version) urged “providing a greater degree of certainty in planning” and an “efficient public review process”. The clear implication was that the inconveniences our current planning and review processes impose upon the “building and development industry” are excessive and onerous. The widespread knowledge among that “industry” that development here is a difficult proposition has accounted in no small measure for the fact that over-development has not occurred here, as it has in just about every other desirable locale. We are not particularly anxious to begin greasing the development skids - for which terms like “providing a degree of certainty in planning” and “efficient review process” often serve as code words.

l. **Community benefit** - The production of affordable and workforce housing is a community benefit, eligible for inclusion in statements of over-riding considerations when certifying environmental impact reports and approving projects.

m. **Neighborhood compatibility** - Compact, well-designed, higher density developments encourage more moderately priced housing by producing smaller units, while preserving green space and respecting the integrity of existing neighborhoods. Neighborhood compatibility does not mean neighborhood uniformity. Opposition to higher density should not be the sole basis for rejecting developments.

(REPLY): The concept that smaller units necessarily translates to moderate prices is questionable enough. But “respecting the integrity of neighborhoods”?!? Have the drafters of this Statement ever approached any neighborhood organizations – or even Allied Neighborhoods Association, which represents many of those organizations – to solicit their views as to what constitutes “integrity of neighborhoods” or “compatibility”? To include

a paragraph such as this without consulting any of these neighborhood organizations is curious, to say the least.

n. **Green building design** - We support the use of green building design principles and techniques, such as maximum energy efficiency, use of recycled materials, and solar energy. Green building can be combined with good architectural design and should be incorporated into new construction when economically feasible. The encouragement of green building techniques should continue and it is the responsibility of government and the private sector to educate the community to the environmental and economic benefits of green building.

(REPLY): We are all for “green” building design.

Laws & Zoning Changes

1. **Rezoning** – Commercial and industrial land should be rezoned and redeveloped to provide for the production of a range of affordable housing, open space and transit projects. In certain cases, selected and appropriate urban agricultural sites may be used for affordable and workforce housing in order to discourage urban sprawl and protect other areas suited for parks, agriculture or open space.
2. **Coastal Zone designation** – We recognize the special qualities and needs of the lands within the Coastal Zone and urge maximum cooperation among the region’s governments and the Coastal Commission and its staff to explore how the HOT Principles comport with Coastal Act policies.
3. **Land use priorities** – Priority should be given to changing land use regulations in order to support mixed use, redevelopment, residential development of commercially zoned land, second units, rental units, and other alternative concepts of housing development. Land use and development decisions should balance and integrate housing production, the preservation of open space and transportation access.
4. **Redevelopment** – Sites currently developed with non-residential uses should be considered for conversion to residential development or mixed use. Redevelopment should result in no net loss of very low, low or moderate income housing.
5. **Moderate and workforce housing** – Governments should consider using inclusionary housing programs with bonus density and other incentives to provide moderate income and workforce housing.

(REPLY): The wisdom of the above five recommended changes must be closely examined in light of their impacts upon other competing community priorities, and the ranking of these various priorities. The General Plan Update is the appropriate place for this examination, and policy decisions of this magnitude must await the completion of that process. To act otherwise is to denigrate the significance of the City’s General Plan, and the citizen-driven (one hopes) process behind that Plan.

6. **Housing for low- and very-low income households** - Housing production for low- and very-low income households requires subsidization. The subsidy should come from broadly-based community funding mechanisms, such as in-lieu fees, private and government contributions to housing trust funds, general revenue bonds, redevelopment income, a profit-based property transfer fee and other alternatives.
7. **Employer housing responsibilities** - The region's employers should play a significant role in meeting the housing needs of their workforce. Public-private partnerships should be encouraged and new forms of home ownership and development economics should be explored. Employee housing should be built on or near the job site where feasible, and employers should be involved in transportation options where housing is more distant, including coordinating with train, bus, marine or other mass transit methods.
8. **Efficient land use** - To promote efficient and predictable land use, projects should be encouraged to build at General Plan densities while addressing environmental impacts. The practice of approving and building at lower densities results in larger, more expensive housing.

(REPLY): We have no argument with 6, 7, and 8, above.

9. **Well-designed, high-density rental projects** - Local governments should encourage the production of well-designed high-density rental projects by providing incentives such as preferential processing, fee waivers or deferrals, and adoption of land use and housing policies which support such development. For example, up-zoning selected sites to create multi-family rental housing units conserves land, reduces infrastructure costs, encourages the use of public transportation and helps provide real housing solutions for our community.

(REPLY): In determining how much new rental housing to encourage, some realities must be considered. This City now has more than half its housing units in rentals. One would be hard pressed to find a residential area in the downtown vicinity that doesn't have at least one apartment building in each of its blocks. How much rental housing is enough? This question is another one that is appropriate for examination in the General Plan update process. Keep in mind that in so desirable a locale as Santa Barbara, one cannot make the assumption that all – or even most - new rental units will be taken up by existing residents, local workers, or even present commuters.

Organizational endorsement of this document indicates a joining of consensus around this statement.

(REPLY): “Organizational endorsement of this Document *indicates a joining of consensus* around this statement”? Either one endorses a statement and all that is in it, or one doesn't. To endorse “most” of a statement, and then allow that endorsement to be used as an indication of some kind of “consensus” around its specifics, seems to us a measured endorsement indeed, if not disingenuous and misleading.

We welcome this community effort. While the groups signed below support the fundamental principles, goals and most of the strategies outlined in this document, we also reserve the right to pursue policies and actions that reflect our organization's agenda.

(REPLY): These groups support “*Most of the strategies*”? What kind of an endorsement is that? Endorsements generally imply agreement with all that is in the document being endorsed, and the proponents of this one should know this. The devil is in the detail: *which* strategies are supported, by *whom*? Which strategies *aren't* supported? Are we being urged to pursue specific governmental action on the basis of “general” endorsements of unspecified “strategies”?

(“HOT” signers:)

American Planning Association, <i>Central Coast Chapter</i>	Jon Martin
Coastal Housing Coalition	Housing Authority of the City of SB
Community Environmental Council	Housing Authority of the County of SB
Economic Community Project	Santa Barbara County Action Network
Dick and Mickey Flacks	Sierra Club, <i>Los Padres Chapter</i>
Home Builders' Association	Naomi Schwartz

(RESPONSE):

IN CONCLUSION

As stated initially, our issue is not with goals, but with the strategies being promoted herein. A fundamental challenge is that the building of housing within our urban boundaries, alone, is absolutely no guarantee of – or even a decent offer of hope for – the prevention of the ravaging of outlying areas, because of the infinite development pressures to which this area will always be subject.

The “consensus” outlined in this document is predicated upon the assumption that the endorsed proposals and policies *can in fact* accomplish what they promise (such as: substantive gains in housing that is affordable to “non-commuters” from “all economic sectors”). We cannot so easily accept these assumptions. For example, who can deny that, in one of the world's most desirable locales, a shortage of housing affordable to all might simply be inevitable? Or assume that in such a place we can substantially reduce the number of commuters? Even cities that have *no* housing affordability problems have huge commuter problems! We have to temper these lofty ambitions with a dose of realism.

We are not naysayers or obstructionists (nor are we “anti-social justice meanies”); simply realists. The City now has approximately 13% of its housing stock “affordable”, in one form or other (in addition to a large number of illegally occupied units). For a point of reference, we looked to a similarly sized, attractive city known for its “progressive” attitudes and policies: Boulder, CO. Their housing Plan sets a *goal* of 10%!

How a progressive and compassionate community – one that is so attractive that a shortage of affordable housing is a practical and perpetual inevitability – determines the appropriate extent of its housing efforts is a key question we must address.

We support a number of practical and positive measures to assure that adequate, safe and sanitary housing is available to residents most in need of it, and for assuring the retention of a healthy middle/working class within this City. These “HOT” proposals for construction of dense housing developments that potentially subvert existing community density standards are simply not on our list– and we oppose them for good reasons!

We accept the challenge to participate in the public debate on these matters. But let’s *really* make sure the available choices are made as part of a “democratic participatory decision making” process: the City General Plan Update process. What better opportunity? (And maybe even have these choices endorsed democratically, namely by votes of the people.)

Sincerely,

**Allied Neighborhoods Association
January 1, 2008**