

In June 2007, CPA was asked to endorse a document titled "Common Ground: A Statement of Shared Principles on Housing, Open Space and Transportation." According to the document, it emerged from a series of meetings of individuals, "drawn from the development community, environmental organizations, and social justice groups," who 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."

After careful consideration by our Comprehensive Planning Committee and Board of Directors, CPA declined to endorse the document, as did other invited organizations including the Environmental Defense Center and the League of Women Voters. Our main reasons for doing so are spelled out in a response intended to be COOL -- "Conscious Of Our Legacy" of 47 years of protective planning to benefit Santa Barbara County's diverse population and fragile natural environment. When we receive permission from the "Common Ground" authors to reproduce the entire correspondence, we will post the HOT document along with our COOL response:



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TO: HOT Committee
c/o Pat Saley <psaley@co.santa-barbara.ca.us>
FROM: Citizens Planning Association's Board of Directors
Date: 15 August 2007

Re: Response to the HOT Principles document

Dear Committee Members,

The Citizens Planning Association appreciates the effort that went into the production of the document entitled "Common Ground: A Statement of Shared Principles on Housing, Open Space and Transportation ("HOT")." We wish to assure the drafters of the document that we share some of their stated goals -- green building design, public support for affordable rental units, and employer-provided workforce housing foremost among them. We also agree that the issues of Housing, Open Space, and Transportation are intricately interwoven. But we cannot endorse the document because CPA continues to approach the HOT topics of "Housing, Open Space, and Transportation" in a COOL way - "Conscious Of Our Legacy" of 47 years of protective planning to benefit Santa Barbara County's diverse population and fragile natural environment.

In general, we don't believe that the HOT document reflects sufficient environmental concern for preserving our natural and infrastructural resources including such visual resources as historic buildings and unobstructed ocean and mountain views. It stipulates, for example, that "the production

of affordable and workforce housing is a community benefit, eligible for inclusion in statements of overriding considerations when certifying environmental impact reports and approving projects." But the document doesn't say or implies that the protection of the environment, too, is a community benefit, eligible to trigger overriding considerations in the review of proposals for the production of affordable and workforce housing.

In particular, we wish to register our disagreements with the HOT document on two counts: its anti-city bias and its insufficiently analytic approach to the South Coast's jobs/housing imbalance.

1. Anti-city bias

We recognize that the prevention of sprawl beyond urban limits is a worthy goal. Especially the splendid Gaviota Coast has many fervent admirers and active defenders among us. But we dispute the assumption that accommodating "increased housing supply within our urban boundaries" can ensure long-term protection against sprawl outside those boundaries.

We note that extra-urban sprawl continues to be favored by many wealthy land owners and developers with significant clout to help elect and influence land use decision makers. Under such circumstances, any proposed sacrifice of the quality of city life and environment would fail to "reduce development pressure on agricultural land and environmentally sensitive habitats" outside urban boundaries. And the sacrifice would have to be made by urban dwellers who already face greater traffic congestion and air pollution, and in some cases greater economic hardships, than most residents of the outlying areas.

In the City of Santa Barbara, for example, more than half of the population is made up of tenants rather than home owners and about 15 percent of the housing stock is affordably resale-restricted or rent-controlled. We don't believe, therefore, that it is socially fair and just to diminish further the air quality and other natural resources of Santa Barbara and its urbanized unincorporated surrounds. Yet the implementation of some of the HOT principles would result in "expedited" urban infill development and probably cause Santa Barbara and other cities of the county to lose most of their remaining open space including "selected and appropriate urban agricultural sites."

2. Insufficient analysis of the South Coast's Jobs/Housing imbalance

In addition to avoiding sprawl, the HOT document announces another worthy goal: "Each geographic region of the county should strive to create and maintain a jobs-housing balance to minimize traffic congestion [and] reduce the need for long-distance commuting." We believe that the vague notion of "striving" for jobs/housing balance is no substitute for a realistic assessment of what, precisely, can be done, and what shouldn't even be attempted, as we try to reduce the present imbalance. Far from exhausting this complex subject, the following remarks are offered as pointers in the direction of a more detailed analysis.

Considerable Jobs/Housing imbalance prevails in most metropolitan areas of both the United States and many other countries. But a blissful "balance" between employment and housing opportunities is particularly elusive for Santa Barbara County's South Coast region where unemployment is low while the competition for local housing is severe at all economic levels.

Close to the top of the income ladder, wealthy retirees are attracted to the South Coast as one of the most desirable living areas of the world. Close to the bottom of the ladder, the large and growing

number of students attending UCSB and other institutions far outnumber the dormitory rooms available to them. Moreover, most retiring members of the present workforce who have the good fortune to live here don't relinquish their residences to make room for their replacements at the work place.

What does this mean for the foreseeable future? It means that many members of our work force will continue to commute either because they cannot afford to live on the South Coast or because they can more easily realize the American Dream -- the purchase of a sizable home with a sizable back yard -- at some distance from their place of employment. And some people will continue to commute because they belong to households in which one or more additional bread winners do not work on the South Coast.

We believe that long-distance commuters, whether they commute by choice or necessity, should be assisted by significantly increased public support for convenient bus and rail service, coupled with employer-sponsored incentives to take advantage of those environment-friendly services. At the same time, it is important to realize that long-distance commuting on the South Coast is a matter of necessity for many people while it is a matter of choice for many others. We believe that a socially just housing policy must seek to *diminish the necessity* to commute rather than impose public sacrifices in order to *influence the choice* to do or not to do so.

We therefore favor affordable rental and ownership programs devoted entirely to assisting very low, low, and moderate income workers, especially the disabled. By contrast, we don't embrace inclusionary housing programs, apparently favored by the drafters of the HOT principles, which make between 15 and 25 percent of an ownership project's market-rate units available to middle and upper middle income households at reduced prices deemed affordable to them.

We have four main reasons for opposing the latter kind of program. First, we believe that such inclusionary housing programs worsen rather than improve the area's jobs/housing balance: the residents of new market rate units, and even the residents of the new middle and upper-middle income inclusionary units, add to the South Coast's need for service workers. Second, these programs seem incapable of giving privileged treatment to the so-called "critical work force" (fire fighters, nurses, and law enforcement officers) whose constant presence near their work place would be a distinct community benefit, especially at the time of major emergencies. Third, the lottery system employed to assign below-market-rate units with their unrealistically low property tax rates to a few lucky winners turns a much larger number of people, most of whom do not even participate in the lottery, into unlucky losers who must indirectly carry the full tax burden, or its equivalent in rent, that the owners of inclusionary units are not required to shoulder. Fourth, the affected jurisdiction's cost for administering the program and for providing infrastructural support for the resulting residential developments must be subsidized, in part, by people who occupy similar or lower rungs of the economic ladder than the winners of the inclusionary lottery.

To conclude:

Our disagreements notwithstanding, we are pleased to have been approached for an endorsement of the HOT principles and stand ready to engage in further conversations that may eventually help a greater number of individuals and organizations, including CPA, to reach consensus and build on "common ground."