



TO: Planning Commission Chair and Members

SUBMITTED BY: Peter Imhof, Planning and Environmental Review Director

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SUBJECT: Affordable Housing Design (Implementation of Housing Element Subprogram HE 2.4(g))

RECOMMENDATION:

Receive a presentation on affordable housing design and provide recommendations on whether to pursue actions to support affordable housing design.

BACKGROUND:

The City adopted the Housing Element 2023-2031 (Housing Element) on December 5, 2023, which was subsequently certified by the California Department of Housing & Community Development (HCD) on February 5, 2024. The City's adopted Housing Element includes goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The Housing Element contains an "Eight-Year Action Plan" that lays out the timeline for program implementation.

One of the Element subprograms identified for implementation early in the Eight-Year Action Plan is HE 2.4(g) Affordable Housing Design. Subprogram HE 2.4(g) states "[t]he City will research affordable design principles, including in collaboration with other agencies and stakeholders, to determine potential viability in the City and pursue regulatory amendments."

The City contracted with BAE Urban Economics (BAE) to assist with Housing Element implementation. As part of that contract, a subconsultant to BAE, Environmental Science Associates (ESA) was tasked with conducting the research identified in subprogram HE 2.4(g). This effort included producing a report that summarized the analysis and findings from (1) research on the concept of affordability-by-design, (2) input from stakeholder involved in housing in the region, and (3) an assessment of the City's housing policies and regulations to determine potential opportunities for improvements.

DISCUSSION:

ESA researched concepts of affordable-by-design and existing City regulations and policies and conducted stakeholder outreach to provide a comprehensive understanding of the key factors influencing affordable housing development in the City. ESA compiled findings from their research and stakeholder outreach into a Development Economics and Affordable-by-Design Report (Report), that is provided as Attachment 1. A table of Report findings and corresponding staff recommendations is provided in Attachment 2 and is to be used with this staff report as a tool to track recommendations. The Report is structured as follows:

- **Introduction.** This section includes a table of contents and provides the purpose of the Report, which is to identify critical issues and opportunities within the local housing framework and to present actionable recommendations.
- **What is Affordable-by-Design?** This section defines affordable-by-design, explains the systems-based approach to understanding affordability, and presents related research findings. More details on this section are below:
 - **Definition of Affordable-by-Design.** This subsection describes affordable housing design as the intentional approach of creating housing solutions that prioritize affordability throughout the development process, from planning and construction to long-term maintenance. It also addresses the benefits that come from addressing affordability at every stage of the development process.
 - **A Systems-Based Approach.** This subsection explains that affordable design requires an approach that includes the three “S’s”: supply, stability, and subsidy. The Report notes that increasing the housing supply is essential to meeting demand and alleviating market pressures and that affordable-by-design strategies, such as streamlined approval processes, fee waivers, and removing regulatory barriers (like certain development standards) directly contribute to expanding supply while keeping costs manageable. The Report notes that without stability measures, increased supply alone cannot guarantee sustained affordability or prevent displacement. Finally, regarding subsidy, the Report notes that affordable-by-design strategies reduce the reliance on subsidies by lowering development costs but subsidies remain essential to bridge the gap between development costs and the for-sale or rental price of affordable housing at all income levels.
 - **Affordable-by-Design Research Findings.** This subsection explains ESA research methods, research results, and findings highlighting strategies for achieving affordability by design in Goleta. Case studies, findings from economic studies on housing supply and affordability, policy evaluation, and

stakeholder input supported this effort and are summarized in the Report. Topics explored include:

- Regulatory and procedural topics like residential density standards to spread fixed costs across more units for example, reducing parking requirements to reduce the development cost per unit, addressing additional costs associated with inclusionary housing requirements, and streamlining of processes to reduce processing time and costs.
 - Efficiency in design concepts like volume-to-surface ratios to support lower constructions costs and contribute to energy efficiency, modular and prefabricated design to lower costs through mass production and faster construction timelines, and collaborative housing to reduce costs while increasing resident satisfaction.
 - Utility performance topics like passive house standards, all-electric buildings, net-zero energy buildings, advanced materials and construction techniques, smart building technology, and efficient water systems to enhance affordability and sustainability.
 - Equity and accessibility strategies like community land trusts and shared ownership models to ensure long-term affordability and prevent displacement by removing land from speculative markets and tailoring solutions for different segments of the population (such as seniors or individuals with disabilities) to optimize resources while meeting unique needs.
- **Stakeholder Outreach Feedback.** The section summarizes stakeholder outreach conducted to inform the Report. Three virtual, one-hour outreach sessions with stakeholders were held on December 10, 2024. Invited stakeholders included for-profit and non-profit developers, who have built or are considering developing housing in Goleta, as well as housing advocates who have been engaged in housing issues in the region. The purpose of the stakeholder outreach sessions was to hear what stakeholders' experiences have been with building and supporting housing in the City and to gather input on constraints and opportunities for affordable housing design. This section of the Report includes a summary of the feedback received from those sessions. The feedback summary is broken down into the following categories:
 - **Process.** Process feedback is summarized, focusing on permit streamlining and partnerships. Both affordable housing and market-rate developers in Goleta highlighted the importance of permit streamlining and the positive impacts a smooth and efficient process can have on a project. This section summarizes specific feedback from stakeholders on each part of the permit process and the ways they suggest the processes could be improved. Topics include the pre-application Planner Consultation process, discretionary review and the California Environmental Quality Act, and challenges related to comments received during the plan check process.

The value of collaboration between for-profit and non-profit housing developers was also noted.

- **Policies.** Policy feedback is summarized, focusing on fee deferrals, reductions, and waivers; Housing Element policies and special needs housing; and housing accessibility. Stakeholders mentioned how important financial incentives, specifically impact fee waivers or deferrals, are for projects and how the affordable housing developers value the City's willingness to provide waivers. Issues related to special needs housing (such as for individuals with developmental disabilities) were raised, both related to access to available housing units and to the physical site design and design of individual units in terms accessibility and adaptability. Stakeholders also encouraged the City to advocate for innovative housing solutions, such as modular or 3-D printed designs, to address the needs of diverse populations better.
- **Regulations.** Regulatory feedback is summarized focusing on inclusionary housing regulations and development standards. Feedback on inclusionary housing related to the financial feasibility of meeting the requirement, bank financing challenges, and a perceived disproportionate burden to address affordable housing. This section includes an analysis of the costs (or loss of profit) associated with meeting the City's inclusionary housing requirements on site based on cost estimates provided by one property owner. Regarding development standards, parking, height limits, and open space requirements were noted.
- **Requirements and Recommendations.** This section provides analysis of City processes, policies, and regulations (similar to and building off the stakeholder outreach feedback above). For each of these topic areas, subtopics are analyzed and recommendations are provided. The analysis typically includes a review of City requirements (like those in Housing Element policies and zoning regulations as in Title 17 of the Goleta Municipal Code (GMC)), as well as State and federal requirements and case law, when relevant. The recommendations in this section are found at the end of the analysis for each subtopic. The longest portion of this section is the analysis of City regulations. Focus is given to the City's inclusionary requirements and various development standards that can impact housing supply, including residential densities, height maximums, lot coverage maximums, open space requirements, and required parking.

For ease of understanding the scope of all the recommendations in this section, all Report recommendations are consolidated at the end of the Report in Table 4 (Summary of Recommendations). Further discussion of the Report recommendations and City staff approach to addressing those recommendations is provided below.

- **Conclusion.** The last section of the Report concludes that addressing regulatory constraints, streamlining permitting processes, and strengthening partnerships are

essential steps to facilitate affordable housing development and reduce costs. Expanding incentives for adaptable, accessible, and multigenerational housing models can ensure that housing meets the needs of all residents, including individuals with disabilities and lower-income households.

Staff Responses to Recommendations

A comprehensive list of the Report's recommendations, summarized by staff, can be found in Attachment 2 to the Staff Report. This table also includes City staff's response to each recommendation. Staff responses identify how staff intends to approach implementation of the various recommendations. These approaches fall into five broad categories. These categories are summarized below and examples from each category are highlighted.

Category 1: Implement with General Plan

Eight recommendations fall within this category. No separate action is needed on these recommendations as staff believe they already fit within or augment existing Housing Element subprograms, or some other policy or implementation action in the General Plan, that staff is working to implement.

Several of these recommendations reflect suggestions for impact fee waivers and deferrals (such as Recommendation 4.2.a to explore extended fee deferrals for affordable housing projects). The City can consider these recommendations when the City implements Housing Element subprogram HE 2.4(f), Reduced Impact Fees. Implementation of that subprogram is expected later in 2025.

Implementation of Housing Element subprogram HE 2.4(f) is expected to begin in 2025 after the City updates various development impact fees. While led by Advance Planning, any consideration of impact fee reductions, waivers, or deferrals would need to be coordinated with Public Works and Neighborhood Services Departments.

Recommendation 4.2.g includes the establishment of design guidelines that promote accessibility features. This recommendation can be considered with the broader General Plan Implementation Action VH-IA-2 (Preparation and Adoption of Design Guidelines). Preparation of design guidelines would be led by Advance Planning and was listed as a future project contingent upon staff capacity in PER's Fiscal Year 2024-2025 Annual Work Program.

Category 2: Procedural Improvements in 2025/2026

Twelve recommendations fall within this category. Many of these recommendations can typically be done at the staff level. Additionally, these recommendations often can be folded into other initiatives the City is undertaking, often as part of existing Housing Element implementation.

Recommendations in this category that can be done at the staff level include efforts to provide additional information regarding City planning processes and affordable housing to the public. For example, Recommendation 4.1.a calls for a Planner Consultation (a pre-application review to assist potential applicants better understand the City's process and issues that will need to be addressed in a future application) informational handout and Recommendation 4.2.k suggests the development of an interactive housing dashboard to map affordable and accessible housing units in the City.

Other recommendations in this category can be addressed with the next Title 17 clean-up ordinance. Title 17 clean-up amendments typically happen annually and City staff expects another round of these amendments to be presented to Planning Commission and City Council later in 2025. Recommendations that can be included in the clean-up amendments include clarifications for how the City implements the inclusionary housing policy found in Housing Element subprogram HE 2.5.

Recommendation 4.3.b identifies an update to the nexus study for the City's inclusionary in-lieu housing fee every five years. The original nexus study, "Residential Affordable Housing In-Lieu Fee Analysis and Recommendations," was incorporated into City Council Resolution No. 21-45, on October 5, 2021. Included in that nexus study is the following recommendation: "[s]ince the overall costs associated with providing affordable units changes over time and are sensitive to market conditions, a more comprehensive update of in-lieu fees to update key inputs and assumptions (e.g., affordable rents, affordable unit development costs, etc.) is recommended every three to five years." Recommendation 4.3.b, including the timing of the update, aligns with the recommendation in the original nexus study.

The recommendations in Category 2 related to additional information for the public will be addressed by PER staff from Advance Planning, Current Planning, and the Building Division as time permits in the normal course of business. Advance Planning staff will manage the Title 17 amendments noted above. An update to the housing in-lieu study referenced above would represent a new work effort. Internal staffing for that project would need to be determined and funding for a consultant would likely be needed.

Category 3: General Plan and Zoning Amendments to Consider in 2027

Six recommendations fall within this category. These recommendations typically include changes to development standards beyond those the City committed to make (and have made) as part of programs in the Housing Element. Such recommendations include changes like increased heights in certain areas of the City that allow mixed-use (Recommendation 4.3.i), increased lot coverage allowance in zones that allow residential development (Recommendation 4.3.i), and removal parking requirements for affordable units, studio units, and units near transit (Recommendation 4.3.l.1). As noted in Attachment 2, some of the Report recommendations in this category would need General Plan amendments in addition to amendments to Title 17 (Zoning) of the GMC.

The date of 2027 is identified because Housing Element subprogram HE 3.1(d)(10) directs staff to conduct a mid-term evaluation in 2027 to assess the effectiveness of the

Housing Element strategies to improve access to housing in high opportunity areas, facilitate mobility for lower-income households and other protected classes, and address housing affordability and make adjustments within one year to achieve the overall goal of producing 250 units. The recommendations in this category could be used, as necessary, to implement subprogram HE 3.1(d)(10). Allowing additional time before considering these recommendations would also allow the City additional time to understand how the existing standards impact development on housing sites identified in the Housing Element.

Should the City move forward with the recommendations in this category, in 2027 or at some other time, that effort would be led by the Advance Planning Division of PER and would constitute a significant work effort.

Category 4: Changes to consider for the next Housing Element

Four recommendations fall within this category. The first, Recommendation 4.2.e, specifically identifies data collection for people with developmental disabilities in future Housing Element updates.

The other three, Recommendations 4.3.a, 4.3.c, and 4.3.e, would require the City to change the City's inclusionary housing policy in Housing Element subprogram HE 2.5 (to allow more flexibility for developers to pay the City an in-lieu fee instead of building below market-rate units on site without having to show that building on site is infeasible and to reduce the inclusionary unit percentage requirement). City staff does not support revising the Housing Element at this time, given the complexities of receiving HCD certification and the uncertainty associated with revisiting that certification. Additionally, the Housing Element analyzed the City's inclusionary policy as a potential constraint to housing and determined the policy to not be a constraint to housing.

With that said, Staff does support considering these recommendations in the build-up to the next Housing Element update, which will be due on February 15, 2031. Staff believes the issues raised in the Report regarding the City's inclusionary housing policy are worthy of further consideration. Revisiting these recommendations in the 2029-2031 time frame would allow the City to better understand how housing projects are processed, given the other changes to City zoning regulations made to implement the Housing Element and how applicants, particularly on sites rezoned during the Housing Element process, seek to and ultimately comply with Housing Element subprogram HE 2.5.

The next Housing Element update project will be managed by the Advance Planning Division within PER. This project will be a considerable work effort, but the recommendations within this category are not expected to significantly alter that work effort. However, should the City Council direct staff to update the City's inclusionary housing policy in Housing Element subprogram HE 2.5 prior to the next Housing Element update project, the effort would constitute a significant new work effort for Advance Planning and would require consultant support and budgeting consideration.

Category 5: Not recommended

In two instances, City staff is not supportive of Report recommendations.

The first instance is Recommendation 4.3.d, to transition from setting the “affordable” sales and rent prices for below market-rate units from a formula based on the number of bedrooms in the unit to a system based on the square footage of the unit. The rationale of this recommendation is that utilization of square footage better aligns with costs associated with development. The current approach focuses on the resident of the unit, not the cost attributable to the developer. Staff are concerned that the recommendation runs the risk of incentivizing the creation of larger units (by square footage) at a higher cost (sales prices or rent) for households without providing a commensurate increase in housing occupancy/capacity. This recommendation would also require a significant revision to the City’s Affordable Housing Policies and Procedures Manual, which was adopted by City Council through an extensive review process in 2023.

The second instance is Sub-Recommendation 4.3.g.3, which calls for greater clarity on how to deal with fractional units as part of the City’s inclusionary housing requirements. Fractional units occur when a development needs to develop a number of below market-rate units that is not a whole number (e.g., how would you build 1.2 units affordable to a household falling within the lower-income category?). Staff believe the current fractional unit regulations in the GMC provide sufficient clarity.

If the City were to move forward with Recommendation 4.3.d, that effort would be led by the Affordable Housing Implementation Program within PER. Implementation of Sub-Recommendation 4.3.g.3, if done in the future, could be done with the City’s next Title 17 clean-up amendments, which would be prepared by the Advance Planning Division of the PER.

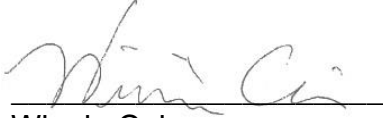
Planning Commission Feedback and Next Steps

City staff are seeking concurrence from the Planning Commission regarding staff’s responses summarized above and detailed in Attachment 2 of this staff report. Workload and budget considerations will be addressed at a later date and should not factor into the discussion as a constraint at this time. The important feedback is the Commission’s input on the recommendations and their ability to measurably improve affordable-by-design principles and outcomes in Goleta. Staff also welcome any feedback on any specific recommendations that the Planning Commission is particularly supportive of or concerned with.

FISCAL IMPACTS:

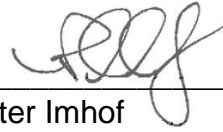
The fiscal impacts related to this Memo are included under the budget allocated for the BAE agreement, with a not-to-exceed amount of \$66,100 for the agreement. Funds for the agreement are available in the Fiscal Year 2024/25 budget in General Ledger Account #101-40-4300-51200 (Professional Services) and #101-40-4300-51207 (Professional Services – Zoning Code).

Legal Review By:



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Approved By:



Peter Imhof
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ATTACHMENTS:

1. Development Economics & Affordable-by-Design Report (ESA, February 2025)
2. Summary of Development Economics and Affordable-by-Design Report Recommendations and Staff Responses
3. Staff Presentation

Attachment 1

Development Economics & Affordable-by-Design (HE Program 2.4g) Report (ESA, February 2025)

Development Economics & Affordable-by-Design Report

Prepared by



Environmental Science Associates

for



February 2025

Development Economics & Affordable-by-Design Report

1. Introduction

The Development Economics & Affordable-by-Design Report aims to consolidate the analysis and findings from ESA's research and education on affordable-by-design and existing city regulations and policies, as well as input received during stakeholder outreach, to provide a comprehensive understanding of the key factors influencing affordable housing development in the City of Goleta. This report serves as a resource to identify critical issues and opportunities within the local housing framework and to present actionable recommendations. By examining affordable-by-design principles, stakeholder feedback, and existing regulatory landscapes, the report provides a framework for targeted regulatory changes and strategic actions to maximize cost efficiency, feasibility, and accessibility in future affordable housing projects.

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2. What is Affordable-by-Design?

2.1 Definition of Affordable-by-Design

Affordable housing design refers to the intentional approach of creating housing solutions that prioritize affordability throughout the development process, from planning and construction to long-term maintenance. The concept extends beyond the physical structure; it involves strategic decisions about location, density, unit size, design, materials, construction methods, and amenities. It not only incorporates elements that reduce costs for developers, but also for residents and the community. The goal is to strike a balance between economic feasibility for developers, affordability and quality of life for residents, and broader community sustainability, ensuring that housing can remain financially accessible without sacrificing quality, durability, or community integration.

By addressing affordability at every stage, from zoning regulations to the permitting process to construction methods and long-term maintenance, affordable housing design fosters equitable and resilient housing solutions.

2.2 A Systems-Based Approach

While affordable housing design addresses the direct costs associated with permitting, constructing and maintaining housing, achieving affordability for developers and residents requires a systems-based approach. This includes increasing housing supply, stabilizing tenancies, and providing financial assistance or subsidies where needed. It is important to acknowledge these three components to

understand that addressing affordable housing design alone will not be enough to create and maintain affordable housing. These are briefly explained below.

Supply

Increasing the housing supply is essential to meeting demand and alleviating market pressures. A greater volume of housing, particularly multifamily units and affordable housing types, helps moderate prices and create opportunities for diverse housing options. Affordable-by-design strategies, such as streamlined approval processes, fee waivers, and removing regulatory barriers, directly contribute to expanding supply while keeping costs manageable (Smith 2023).

Stability

Stability focuses on protecting tenants and ensuring housing security over the long term. Policies like rent stabilization, anti-displacement ordinances, and long-term affordability covenants prevent low-income residents from losing access to affordable units. Without stability measures, increased supply alone cannot guarantee sustained affordability or prevent displacement.

Subsidy

Subsidies provide financial assistance to offset the affordability gap for households that earn less than the market can accommodate. Subsidy programs may include direct funding for low-income housing development, tax credits like the Low-Income Housing Tax Credit (LIHTC), or rental assistance programs. Affordable-by-Design strategies reduce the reliance on subsidies by lowering development costs, but subsidies remain essential to bridge the gap between development costs and the for-sale or rental price of affordable housing at all income levels.

Together, these three components—supply, stability, and subsidy—form an interdependent framework for addressing housing affordability. Affordable housing design serves as a key contributor to housing supply by helping to make it more feasible to create more units that meet affordability standards. However, as suggested above, the solution to affordable housing comes down to three co-equal priorities: supply, stability, and subsidy (Phillips 2020).

2.3 Affordable-by-Design Research Findings

To develop a comprehensive understanding of affordable-by-design principles, our research relied on a multi-pronged approach. We reviewed academic literature, policy reports, and case studies from cities across the United States to identify effective strategies for promoting affordability through design. This included analyzing peer-reviewed studies on housing economics, zoning and regulatory reforms, energy efficiency programs, and social equity initiatives. We also examined real-world examples from cities with innovative policies, such as San Diego, Minneapolis, and Berkeley, to evaluate the outcomes of their affordable-by-design initiatives. Our research methods included:

- **Case Study Analysis:** Investigated successful implementation of affordable-by-design strategies, such as density bonuses, modular construction, and parking reform.

- **Data Review:** Analyzed findings from economic studies, including those highlighting the impact of inclusionary zoning and regulatory changes on housing supply and affordability.
- **Policy Evaluation:** Examined ordinances, standards, and incentive programs aimed at reducing housing costs while promoting energy efficiency and sustainability.
- **Stakeholder Input:** Incorporated insights from developers, policymakers, and affordable housing advocates to identify barriers and opportunities for creating equitable housing solutions (see Section 3 below for Stakeholder Outreach Feedback).

This research revealed that affordability by design is not a one-size-fits-all solution. It requires tailored, context-specific interventions that address regulatory, procedural, design, and equity factors. The findings presented below highlight key strategies for achieving affordability by design within Goleta.

Regulatory and Procedural Factors

The zoning and regulatory landscape can create conditions that support affordability by design. Research highlights the following strategies:

- **Increasing Density:** Allowing higher-density developments or mixed-use zoning can significantly reduce the cost per unit by spreading fixed costs (land and infrastructure) across more units. SPUR's 2007 "Affordable-by-Design" article for how to create middle income housing in San Francisco recommends replacing unit limits with height and bulk regulations, allowing for a combination of smaller, more affordable units with larger units to be built within the same building envelope (SPUR 2007).
- **Parking Requirements:** Mandated parking spaces significantly increase construction costs in urban areas, with studies suggesting that structured parking and underground parking contribute tens of thousands of dollars to the cost per unit (SPUR 2007, Phillips 2020, Buffalo Common Council 2017). Research advocates for reducing or eliminating parking minimums for affordable housing, particularly in areas near transit. Several successful examples are provided below:
 - In 2017, Buffalo, New York became one of the first major U.S. cities to abolish parking minimums citywide. This reform encouraged the development of affordable housing by lowering construction costs associated with parking facilities. Subsequent observations have shown no significant increase in parking issues, as developers tailored parking provisions to actual demand (Buffalo Common Council 2017).
 - Minneapolis eliminated parking minimums for new residential developments in 2018, particularly in areas well-served by public transit. This policy change has been associated with an increase in affordable housing projects. Studies have found that parking utilization rates remained consistent, indicating that the reduction did not lead to parking shortages (Minneapolis City Council 2018).
 - In 2019, San Diego eliminated parking requirements for multifamily residential developments in transit priority areas. This policy change reduced construction costs and facilitated the development of more affordable housing units (City of San Diego 2019). In 2022, a CalMatters article highlighted that the removal of parking requirements in transit-priority areas allowed for significantly lower parking ratios in new projects, enabling more affordable housing units without causing parking shortages, as many residents utilized public transportation (CalMatters 2022).

- **Inclusionary Housing Requirements:** Inclusionary housing ordinances, which require developers to include below-market-rate (BMR) units in new projects or pay in-lieu fees, aim to increase affordable housing supply and integrate low-income households into market-rate developments. However, research highlights mixed outcomes. While these ordinances promote equity and affordability, studies suggest that rigid requirements may inadvertently reduce housing supply or increase costs. For example, the Lincoln Institute of Land Policy (2015) found that overly strict inclusionary zoning policies can deter development or drive up market-rate housing prices if not paired with flexible options like in-lieu fees, density bonuses, or subsidies. Similarly, the Turner Center for Housing Innovation (2024) analyzed Los Angeles' Transit-Oriented Communities program and found that higher inclusionary requirements, when applied without complementary incentives, led to diminishing returns in affordable housing production. To maximize effectiveness, inclusionary housing policies should be tailored to local market conditions, incorporating tools to balance affordability goals with sustained housing production (Lincoln Institute of Land Policy 2015; Turner Center for Housing Innovation 2024; Phillips 2020).
- **Streamlining Processes:** Complex permitting and approval processes add to development costs. Simplifying these can reduce project timelines and financing costs, as demonstrated in several cities that have implemented expedited review for affordable housing projects. Specific examples include:
 - **San Diego's Expedited Permitting Programs:** San Diego has implemented several initiatives to streamline the permitting process for affordable housing, including the Affordable Housing Permit Now, which allows a ministerial permit process for 100% affordable housing projects and emergency shelters; Express Plan Check, which offers faster plan reviews for eligible projects through an additional fee; and Professional Certification for Discretionary Projects, which enables qualified professionals to certify compliance with submittal guidelines, bypassing the initial completeness check and reducing intake times. These programs aim to reduce review times and facilitate quicker project approvals (City of San Diego 2024).
 - **Austin's S.M.A.R.T. Housing Policy:** The City of Austin, Texas, provides an expedited permitting process and building permit fee waivers for transit-oriented, affordable housing. This policy promotes the production of housing affordable to households with incomes up to 80% of the area median income ([LSA Planning 2018](#)).

Efficiency in Design

Design choices have a direct impact on construction costs, energy efficiency and long-term affordability:

- **Volume-to-Surface Ratio:** Designing buildings with efficient shapes, such as squares or rectangles, reduces the amount of exterior wall material needed, which is one of the more expensive components of construction. These shapes not only lower construction costs but also contribute to energy efficiency by minimizing heat loss or gain through the building envelope (Pages Ruiz 2024). This principle is central to affordable-by-design strategies as it achieves both cost savings and sustainability.
- **Modular and Prefabricated Design:** Modular construction offers opportunities to lower costs through mass production and faster construction timelines. This method is particularly viable in areas with high labor costs, such as Goleta, as it reduces the need for on-site labor. However, modular construction works best for projects with repetitive unit designs such as affordable housing

developments. Projects with unique or highly customized designs may find modular less cost-effective due to the need for specialized factory adjustments (Phillips 2020).

- **Collaborative Housing:** Collaborative design processes, where residents and stakeholders co-design housing, have been shown to reduce costs while increasing satisfaction. This process often happens in public-private partnerships where the government or non-profits engage with residents to ensure the project meets community needs. For example, in Seattle's Othello Square, a public-private partnership brought together local residents to co-design a mixed-use affordable housing project with spaces for cultural gatherings and small businesses tailored to the area's immigrant communities (Phillips 2020).

Utility Performance

California is a leader in energy and water efficiency standards through its progressive building codes, including Title 24 and CALGreen, which sets rigorous benchmarks for energy-efficient construction. These codes require measures such as high-performance building envelopes, efficient HVAC systems, and mandatory solar installations for new residential buildings. However, research and case studies suggest that there are opportunities to go above and beyond these standards to enhance affordability and sustainability.

- **Passive House Standards:** Passive House standards focus on ultra-low energy use by minimizing heating and cooling demands through airtight construction and super-insulated walls. For example, the Habitat for Humanity project at 822 E. Canon Perdido in Santa Barbara, completed in 2014, became the first multifamily Passive House-certified project in Southern California. This development provides 12 homes for 44 people, including 22 children. Certified Passive House buildings achieve low environmental impact and significantly reduce utility costs through advanced construction techniques (Habitat for Humanity of Southern Santa Barbara County 2014).
- **All-Electric Buildings:** Transitioning to fully electric buildings eliminates natural gas connections and reduces greenhouse gas emissions, while simplifying energy systems. Although Berkeley's natural gas ban in new buildings was overturned in court, cities can still allow developers the option to forgo natural gas hookups in favor of fully electric systems. This flexibility can reduce construction costs while enabling developers to align with sustainable building trends (CalMatters 2022).
- **Net-Zero Energy and Carbon Buildings:** Net-zero energy buildings generate as much energy as they consume, typically through renewable energy sources like solar panels combined with energy-efficient designs. Lancaster, CA, adopted a net-zero energy requirement for all new homes built after 2020, setting a statewide precedent for energy-efficient housing (California Energy Commission 2024). Programs supporting energy-efficient New Construction:
 - **California Electric Homes Program (CalEHP):** Offers up to \$1.5 million per project for all-electric new construction, with a focus on multifamily housing (California Energy Commission 2024).
 - **Building Initiative for Low-Emissions Development (BUILD):** Provides financial incentives for low-income, all-electric residential buildings, offering \$3,300 per multifamily unit or \$5,500 per single-family home (California Energy Commission 2024).

- **California Energy-Smart Homes Program:** Supports developers in adopting advanced energy measures for residential new construction, including single-family homes and accessory dwelling units (California Energy Commission 2024).
- **Advanced Materials and Construction Techniques:** Innovative materials and methods, such as phase-change materials, cool roof coatings, and cross-laminated timber (CLT), enhance energy efficiency while reducing environmental impact. Los Angeles promotes the use of cool roofs to combat urban heat island effects, improving energy performance for residents and communities (Phillips 2020).
- **Smart Building Technology:** Smart building systems optimize energy use with real-time monitoring, demand-response technologies, and automated controls for lighting and HVAC. Sacramento's SMUD program supports affordable housing developments that integrate smart thermostats and demand-response technologies to lower peak energy usage (California Energy Commission 2024).
- **Water-Energy Nexus:** Efficient water systems reduce the energy needed to deliver and heat water, achieving both water and energy savings. In San Francisco, the Non-potable Water Ordinance mandates that new developments of 100,000 square feet or more install onsite water reuse systems to collect, treat, and reuse alternate water sources, such as graywater, for non-potable applications like toilet flushing and irrigation (San Francisco Public Utilities Commission 2024). This requirement not only conserves potable water but also reduces the energy associated with water treatment and transportation, thereby lowering overall utility costs for residents and contributing to environmental sustainability.

Equity and Accessibility

Affordable-by-Design must also address social equity by ensuring housing serves diverse populations:

- **Community Land Trusts and Shared Ownership Models:** These models ensure long-term affordability and prevent displacement by removing land from speculative markets. Examples include:
 - **The Dudley Street Neighborhood Initiative (Boston, MA):** This community land trust manages affordable housing while ensuring long-term affordability and preventing displacement.
 - **Champlain Housing Trust (Burlington, VT):** This is the largest community land trust in the U.S., which has preserved over 2,000 affordable homes.
 - **Oakland Community Land Trust (Oakland, CA):** This trust focuses on converting foreclosed properties into affordable housing and maintaining long-term affordability for low-income families.
- **Tailored Solutions for Populations:** Policies can adjust requirements (e.g., parking or unit size) for specific populations such as seniors or individuals with disabilities, optimizing resources while meeting unique needs. In Chicago, the City's Accessible Housing Program funds developments with larger units to accommodate wheelchairs, mobility aids, and in-home care providers. The Beacon Hill Village in Boston offers co-living spaces and services like grocery delivery tailored to seniors aging in place. Veterans Village in Las Vegas combines small units with larger shared spaces and wraparound services to address the unique needs of its residents.

3. Stakeholder Outreach Feedback

As part of Housing Element (HE) Program 2.4(g), the City of Goleta and ESA held three virtual, one-hour outreach meetings with key stakeholders in the development community on December 10, 2024. The purpose of these sessions was to hear what stakeholders' experiences have been with building and supporting housing in the City of Goleta and to gather input on constraints and opportunities for affordable housing design.

The first session of the day was focused on hearing from affordable housing advocates and the second and third sessions were focused on hearing from developers (both affordable housing and market rate). Eight stakeholders were invited to the first session focused on affordable housing advocates, only one stakeholder from Coalition for Housing Accessibility, Needs, Choices & Equality, Inc. (CHANCE Housing) attended. Twenty developers were invited to the two developer focused sessions¹—six attended the first session, and three attended the second developer session.

For each session, the City/ESA Team gave the same brief, 15-minute PowerPoint presentation to kick-off the discussion. The presentation consisted of a high-level overview of the project and HE Program 2.4(g), as well as what the City/ESA Team means by 'Affordable-by-Design.' Following this brief presentation, the City/ESA Team facilitated a 45-minute open discussion with the stakeholders. Our team prepared a list of questions to help guide the conversation and to learn more about what's working well, what's not working well, and how the City can help make things more affordable and cost efficient to develop.

During the open discussion we heard from a variety of stakeholders, including one affordable housing advocate, as well as affordable housing and market rate developers with a variety of experience in Goleta. Some of the stakeholders have constructed projects in Goleta in the last 10 years, a few that have proposed housing projects but are still working through the review process, a couple that have received approval but not yet constructed, as well as developers that work in adjacent jurisdictions but have not yet developed in the City of Goleta. A summary of the key findings/lessons learned are presented below and organized into three key themes we heard: process, policies, and regulations.

3.1 Process

1. **Permit Streamlining:** Both affordable housing and market rate developers in Goleta highlighted the importance of permit streamlining and the positive impacts a smooth and efficient process can have on a project. They emphasized that while the City does some things well when it comes to permit review, such as offering a pre-application review to developers for entitlement applications, there are opportunities to improve and streamline the City's review at all stages of the permitting process. Common feedback shared during the stakeholder meetings include the following:
 - **Pre-Application Planner Consultation:** A few different developers noted that the City's Pre-Application review process is working well for them and noted that the more the City can publicize and encourage developers to utilize this process the better.

¹ One of the developers invited was unavailable to join either session. They reached out to the ESA/City Team and shared their feedback over phone and email with ESA.

- **Discretionary Review (Entitlements and Environmental/CEQA):** The level of CEQA review was described as a significant factor in the overall approval timeline for discretionary projects. While developers called this out as a constraint to development they also acknowledged that many factors relating to these requirements are outside of the City’s control, such as existing site conditions, CEQA requirements, state law, as well as responsiveness of the applicant to provide required information to keep the process moving forward.
 - **Ministerial Review (Plan Check and Inspections):** Developers noted that they experience the most significant delays during the plan check review process, particularly as a result of often delayed, complex comments from Santa Barbara County Fire Department and the City’s Public Works Department. Multiple developers mentioned these two departments, more often than not, provide feedback late in the review process and that their feedback can result in significant permitting delays. Several developers noted that the comments they receive are often not objective, both during plan check review and during the inspection phase, resulting in a lot of back and forth between the developer and the City to understand the nature of the outstanding comments.
2. **Partnerships:** Affordable Housing Developers emphasized that for-profit and non-profit collaborations in the City of Goleta have been extremely successful. It was suggested that to the extent the City can be vocal and speak up publicly in favor of these for-profit and non-profit collaborations and help facilitate partnerships to enable affordable housing, the better.

3.2 Policies

1. **Fee Deferrals, Reductions and Waivers.** Stakeholders noted that the City of Goleta is recognized as a leader in offering fee reductions and waivers, setting an example for other jurisdictions. Developers highly value these financial incentives, which can significantly lower the cost to develop affordable housing projects. As part of the City’s Development Impact Fee (DIF) Reduction Program², the City waives DIFs that are under its control for beneficial projects – external agencies like the School District, that operate independently control their own fees. Impact fee deferrals, in particular, were highlighted by affordable housing developers as a critical tool for enabling them to manage upfront costs better and improve project feasibility.
2. **Housing Element Policies on Special Needs Housing.** Stakeholders emphasized the need for the City of Goleta to revisit its HE policies on Special Needs Housing, suggesting further analysis in the current or upcoming cycles. The City currently lacks data collection and analysis focused on people with developmental disabilities, leaving a gap in understanding their unique housing needs. Housing for this population requires thoughtful design considerations, both in terms of external building and site design (e.g., adequate parking for live-in staff and visitors, space for accessible transportation services), as well as internal unit size and layout (e.g., space within a unit for live-in caretakers, accessible showers without a tub, storage of equipment such as wheelchairs, etc.). See ‘Housing

² City Council Resolution No. 22-68 adopted on December 20, 2022, amended the City’s DIF Reduction Program for Beneficial Projects, which include the following project categories: “ADU”, “Child Care Facility”, “Family Day Care” and “Day Care”, “Mobile Home”, “Non-Profits”, “Special Care Home”, “Residential Care Facilities”, “Assisted Living”, “Supportive Housing”, “Transitional Housing” and “Special Needs Housing” as presently defined, or may hereafter be amended, in the City of Goleta’s Zoning Ordinances.

Accessibility and Adaptability’ below for more details. Stakeholders also noted that while developers and state decision-makers prioritize housing for other vulnerable groups, such as individuals experiencing homelessness, substance use, or mental health challenges, people with developmental disabilities are often overlooked. State application processes also pose barriers for these populations, particularly when seeking affordable rental housing.

3. **Housing Accessibility and Adaptability.** Stakeholders stressed that Affordable-by-Design principles must prioritize accessibility, adaptability, and affordability. While smaller, “efficient” units are often promoted as cost-effective, these designs can be impractical for individuals with developmental disabilities. Specific challenges include insufficient space for live-in caregivers, storage for medical equipment or wheelchairs, and safe bathroom designs. Multi-generational housing was also highlighted as a crucial consideration, allowing individuals to transition through different life stages while maintaining their independence and quality of life. Stakeholders encouraged the City to advocate for innovative housing solutions, such as modular or 3-D printed designs, to address the needs of diverse populations better. Incorporating accessibility and adaptability into housing design ensures all residents can live comfortably and safely.

3.3 Regulations

1. **Inclusionary Housing Regulations.** Developers in Goleta and the region have raised significant concerns about inclusionary housing requirements as summarized in Section 4.3 Regulations. They emphasize that the current policies create financial burdens that make housing development infeasible. The concerns raised suggest that inclusionary housing requirements, as currently structured, are acting as a barrier to housing development by imposing strict mandates without accounting for the realities of development costs and market dynamics. Common developer concerns include the following:
 - **Financial Infeasibility:** Developers argue that the inclusionary housing requirements result in substantial financial losses, as they are required to sell or rent below-market-rate (BMR) units at prices far below the cost of construction (Molina 2024). Developers note that construction costs in Goleta are among the highest in California. One developer shared that the estimated cost for his condominium development project in Goleta, which would consist of 84 units, each 1,500 square-feet with 3 bedrooms and 3 bathrooms, totals \$833/sq. ft. This amount includes construction costs, soft costs (i.e., fees related to design, engineering, permitting and infrastructure), and land valuation.

Based on the breakdown, the total cost to build a three-bedroom 1,500-square-foot unit at \$833/sq. ft. is \$1,249,500. The market rate sales price as of January 2025 in the greater Goleta area for a brand new condominium is an estimated \$1,000 per square foot (Zillow 2025), which equates to \$1.5 million for each 1,500 square-foot unit. With this project as an example, the following represents the estimated profit/loss per unit at each income level based on the City’s BMR Maximum Sales Prices Effective 5/13/2024:

Table 1 Estimated Profit/Loss per Unit at Each Income Level

Income Level	3-Bedroom Unit Maximum Sales Price per Unit	Per Unit Development Cost (January 2025)	Market Rate For-Sale Comparables (January 2025)	Estimated Profit/Loss per Unit
Extremely Low	\$71,300	\$1,249,500	—	-1,178,200
Very Low	\$160,500	\$1,249,500	—	-1,089,000
Low	\$213,100	\$1,249,500	—	-1,036,400
Moderate	\$398,500	\$1,249,500	—	-851,000
Workforce (up to 200% Area Median Income)	\$675,600	\$1,249,500	—	-573,900
Market Rate	N/A	\$1,249,500	1,500,000	+250,000

For an 84-unit project, 20% or 17 units are required to be sold at BMR prices, as indicated in the table below. The table also provides the estimated profit/loss for the project at each income level and for the project as a whole, which is estimated at a total profit of \$1,367,500.

Given the total estimated development cost of \$104,958,000 (84 units X 1500 SF X \$833 per SF), the total return on cost (ROC) with inclusionary requirements is calculated at 1.3% (Total Profit/Total Cost). By comparison, the ROC without inclusionary requirements would be 20% (84 units x 250,000 Profit ÷ 104,958,000 development cost).

While the standard profit margin requirement for developers varies based on project type, market conditions, and risk factors, developers of market rate housing typically aim for a profit margin of 10-20% of total project costs or an ROC of 15%–20%, which measures profit as a percentage of total development costs.

Without inclusionary requirements, the developer's project would be considered feasible and incentivized. However, with inclusionary requirements, a 1.3% ROC not only falls significantly below industry standards but also fails to account for project risks such as rising material costs, interest rate fluctuations, and market uncertainties. The low return does not provide sufficient financial incentive to attract investment or obtain financing, as lenders often require a cushion to ensure feasibility and repayment capability. For these reasons, a project with such a low return would be considered financially unviable by most developers and demonstrate that the inclusionary requirements as structured serve as a financial burden and disincentive to housing development in Goleta.

Table 2 Total Estimated Profit/Loss at Each Income Level and Project As a Whole

Income Level	Profit/Loss per Unit (from the table above)	# of Units at Each Income Level ^a	Market Rate For-Sale Price per Unit (January 2025) (\$1,000 per sq. ft.)	Total Profit/Loss
Extremely Low (2.5%)	-1,178,200	2	—	-\$2,356,400
Very Low (2.5%)	-1,089,000	2	—	-\$2,178,000
Low (5%)	-1,036,400	5	—	-\$5,182,000
Moderate (5%)	-851,000	4	—	-\$3,404,000
Workforce (up to 200% Area Median Income) (5%)	-573,900	4	—	-2,295,600
Market Rate	+250,000	67	1,500,000	\$16,783,500
Total		84		\$1,367,500

NOTE:

a. The number of units at each income level is calculated by taking 84 units and multiplying that by the percentage required at each income level. The combined fractional units at each income level equated to a full unit applied to the low-income level pursuant to Goleta Municipal Code Section 17.28.050(B)(2)

- **Bank Reluctance to Finance Projects:** Financing challenges are a recurring theme, as banks are hesitant to fund developments requiring developers to absorb significant losses. One developer remarked that lenders typically require 30 percent equity for construction loans, which is difficult to meet given the financial losses associated with inclusionary requirements.
 - **Disproportionate Burden:** One developer shared that it is unfair to task developers alone with the burden of supplying affordable housing. The cost to build BMR units should be distributed equitably and be a shared responsibility among those that create an impact on both the demand and supply of affordable housing.
2. **Development Standards.** The City/ESA Team asked developers about the City's residential development standards, specifically interested in why developers aren't building to maximum allowable densities. All noted that as soon as they try to go up to four stories, the lumber size kicks up and the price per unit goes way up. This, coupled with the capacity to park on site and ability to meet Open Space requirements, are the primary factors driving developers to build three-story buildings below maximum densities (typically building between 25 and 28 units/acre). At this density, developers noted that they can still park at grade without having to go to a podium structure. Other key findings/takeaways from the stakeholder outreach meetings regarding development standards are listed below:
- Developers are using SB 330 and Density Bonus on almost every project and primarily using Density Bonus to alleviate development standards (reduce setbacks or increase building height)—rarely are they using it to increase density.
 - Parking is always a challenge—while it takes up a lot of land and can make it more difficult to get more density, there is a demand for it, and developments need parking.

- Developers do not want to under park their properties.
- Affordable projects have a different financial metric that is subsidized, which enable them to go above three stories and still make it pencil.

4. Requirements and Recommendations

Below is a summary of existing City and state requirements and existing City procedures, followed by recommendations (what the City can consider to address each issue) organized by key themes we heard from stakeholders during outreach.

4.1 Process

Permit Streamlining

City Requirements and Procedures

The City has a dedicated web page for Planning and Environmental Review permit applications: <https://www.cityofgoleta.org/your-city/planning-and-environmental-review/building-planning/permits-and-regulations>. This web page is robust with information, including City contact information, as well as hyperlinks to application and submittal requirements and the City's current zoning regulations and administrative procedures, information about ADUs and SB330, as well as other application types and helpful handouts. The City has a separate page for Advance Planning that includes information about the City's General Plan/Coastal Land Use Plan. This is hyperlinked and accessible via the dedicated web page for Planning and Environmental Review permit applications.

Similar to the City's web page for Planning and Environmental Review permit applications, there is a separate webpage dedicated to ministerial building permit applications:

<https://www.cityofgoleta.org/your-city/planning-and-environmental-review/building-planning/building-and-safety-division>. This webpage includes some information, including contact information, building permit handouts and information about scheduled inspections.

- Discretionary Review (Entitlements and Environmental/CEQA)
 - Permit Review Times
 - As described in the City's 2023-2031 HE, the estimated time between receiving an entitlement and submitting a building permit application is around 6 months. Once the applicant has received an entitlement, it takes time for the applicant's team to prepare the final plans and reports such as the full set of architectural drawings, stormwater plans, a hydrological report, grading plans, and improvement plans (road, sewer, water). This process may be quicker or slower depending on the complexity of the project and how much risk the applicant wants to take to authorize plan development prior to entitlement (City of Goleta, 2023).
 - Environmental review is required for all discretionary development projects under CEQA. The level of CEQA review has a significant impact on project processing times, particularly if an EIR is required. Goleta follows the procedures set forth in CEQA and its guidelines with

respect to environmental review and analysis and public noticing requirements. While CEQA often acts as a constraint to the cost and supply of housing and creates uncertainty in the development process, it is a State mandate that the City has no ability to change.

- Streamlined Procedures
 - Permit Streamlining Act: The City adheres to the processing requirements of the Permit Streamlining Act (Government Code Section 65920 et. seq.). Consistent with these requirements, the City makes a completeness determination within 30 days of application submittal (Government Code §65943). The City includes this 30-day completeness review timeline for all projects, not just those that qualify under the Permit Streamlining Act, in Goleta Municipal Code (GMC) subsection 17.52.030(B). In addition, the City complies with streamlining determinations pursuant to CEQA.
 - Limitations on the Number of Public Hearings: The City's zoning regulations (GMC Section 17.71.010) include limitations on public hearings for projects qualifying under California Government Code §65589.5(h)(2) (limiting qualifying projects to five hearings).
- SB 35/Objective Design Standards (ODS): The City also developed ODS consistent with SB 35 (2017) requirements for streamlined, objective review of certain residential and mixed-use developments. On November 15, 2022, the City Council adopted Ordinance No. 22-14 establishing ODS and associated ministerial permit procedures for projects that qualify under SB 35 or other State law. These new regulations are codified as Chapter 17.44 of the GMC.

In addition to these existing Streamlined Procedures, the City's HE identified the following amendments to Title 17 related to Streamlined Processing as part of Program HE 2.1 'Encourage a Diverse Range of New Housing'. All of these amendments related to permit streamlining, and outlined below, have been completed as of December 2024.

- On December 3, 2024, the City adopted Ordinance No. 24-05. Ordinance No. 24-05 included amendments to address findings for Design Review (ensure Findings 1 and 3 cannot be used to reduce residential density of a proposed project) and Development Plan (remove reference to density in Finding 2) approvals to ensure the findings do not limit residential densities below what is allowed in the relevant land use designation and zoning district
- Also as part of Ordinance No. 24-05, the City exempted mixed-use development that includes no more than 5,000 square feet of nonresidential square footage and no more than 4 dwelling units in the CC, OT, and OI zone districts from the requirement for a Development Plan.
- On December 3, 2024, the City Council adopted Ordinance No. 24-05 which amended various sections of the City's Zoning Ordinance (Title 17), including allowing for 100 percent affordable housing projects ministerial review pursuant to the procedures and standards in Chapter 17.44 of the GMC.
- On November 19, 2024, the City adopted a General Plan amendment, via Resolution 24-65, to Conservation Element subpolicy CE 1.5 to ensure that changes to mapped environmentally sensitive habitat areas are not treated as a General Plan amendment for a project. On December 3, 2024, the City adopted Ordinance No. 24-05. Ordinance No. 24-05 included companion

amendments to GMC Chapter 17.30 (Environmentally Sensitive Habitat Areas) to reflect the amendment to Conservation Element subpolicy CE 1.5.

Recommendations

In addition to the City Initiatives identified in the HE to address issues with the review process, the following outline some recommendations to consider for improvement:

- 4.1.a Pre-Application Planner Consultation:** The City could consider developing a simple handout outlining the City's Pre-Application Review process that they offer. They could add a hyperlink to this handout on their dedicated webpage for Planning and Environmental Review. This could serve to help publicize this information and encourage developers to utilize this process early on.
- 4.1.b Ministerial Plan Check Review and Inspections:** As described in Section 3.1, developers experience the most significant delays during the plan check review process. There are opportunities to improve the information that is publicly available on the City's website as it relates to the building permit plan check review process and inspections. The information on this webpage is less detailed than the information about Planning and Environmental Review permit applications. Some suggestions for improvement include:
 - 4.1.b.1 Common Plan Check Comments Handouts:** The City could develop a handout outlining the most common plan check comments that each department issues by permit/project type. This could help applicants, especially developers that haven't already done work in Goleta, understand what the most common plan check issues tend to be by project type and help them prepare a more complete and comprehensive initial building permit application.
 - 4.1.b.2 Prioritize Plan Check Review.** The City could consider looking at streamlining plan check review for housing development projects and also take into consideration how much affordability is proposed.
- 4.1.c Permit Streamlining:** During the stakeholder outreach meetings, the cities of Paso Robles and Santa Paula were cited by developers as examples of jurisdictions that are doing a good job of coming up with ways to streamline housing, specifically with their new ODS. As of writing of this report, the City of Goleta has received one application that proposed to utilize the ODS adopted by the City in 2022. The City of Goleta should continue to monitor and evaluate applications they receive that propose to utilize the ODS to understand if there are standards that are more favorable to affordable housing design to facilitate permit streamlining.

Partnerships

City Requirements and Procedures

One of the City's HE Goals states that: "Goleta encourages active engagement and collaboration between governmental agencies, private organizations, and community stakeholders to create partnerships and share resources to achieve our housing goals." As described in Section 3 above, several developers noted that for-profit and non-profit collaborations in the City have been extremely successful. The City has worked with developers and housing advocates to ensure that the maximum number of affordable units

is generated at each project site. The City also has continued to work with non-profit housing providers/financers, such as People's Self-Help Housing, to facilitate the development of more affordable housing. Since the dissolution of Redevelopment Agencies and Regional Development Agencies (RDAs) throughout the State, the City has been using other financial sources and mechanisms to facilitate funding for affordable housing via partnerships with the Santa Barbara Housing Trust Fund and other supporting entities.

As part of the City's HE, several programs were identified to continue to promote collaboration and encourage partnerships. The following provides details of each relevant program:

- **Program HE 2.1 Encourage a Diverse Range of New Housing.** Seek funding sources and potential partnerships to expand financial resources to support community rehabilitation.
- **Program HE 2.4 Facilitate Affordable Housing Development.** The City will use its regulatory, financial, and administrative resources to assist in developing affordable housing units.
- **Program HE 2.7 Funding for Affordable Housing.** The City will develop ongoing City and external sources of funding to support affordable housing as follows:
 - b. Participate in external grant programs such as the HOME Investment Partnerships Program (HOME) and Community Development Block Grant (CDBG) and others when appropriate to leverage the City's affordable housing funds for local projects and programs.

Recommendations

As evidenced by the City's HE goals and programs, the City already acknowledges that there are opportunities to enhance relationships and partnerships with nonprofit providers of housing services. In addition to these HE programs, to the extent the City can continue to be more vocal and speak up publicly and often in favor of these for-profit and non-profit collaborations and the benefits of them, the better.

- 4.1.d Partnerships Info Webpage:** To further encourage and promote for-profit and non-profit partnerships, the City could consider adding information to their dedicated webpage for Planning and Environmental Review about for-profit and non-profit partners, including organization names, contact information and links to past projects that have been successful in the City of Goleta. This would enable the information to be more readily available to those interested in learning more about these opportunities in Goleta and exploring these types of partnerships as well as the broader public.

4.2 Policies

Fee Deferrals, Reductions and Waivers

City Requirements and Procedures

The City of Goleta has established policies to reduce financial barriers for affordable housing developers by offering fee deferrals, reductions, and waivers. While Development Impact Fees (DIFs) are not currently automatically reduced or waived for affordable housing projects, the City evaluated opportunities to implement such reductions for 100 percent affordable and special needs housing developments (HE 2.4(f)) and made several amendments, described below. The City also maintains an

Affordable Housing Trust Fund, partially funded through in-lieu fees, and supports various affordable housing initiatives (HE 2.7).

The City of Goleta allows for the development of accessory dwelling units (ADUs) in compliance with state law, including streamlined permitting requirements and state-mandated fee reductions. For permitting, the City has waived zoning permit requirements for many ADUs, as codified in GMC Section 17.41.030. Additionally, the City provides fee adjustments for ADUs in compliance with state law: ADUs under 750 square feet are exempt from Development Impact Fees (DIFs), while those over 750 square feet are subject to proportional fees capped at \$5,000 (GMC subsection 17.41.030(G)).

The City's Beneficial Project Resolution (Resolution No. 22-68) further outlines specific categories of projects eligible for fee reductions or waivers. These include Special Care Homes, Residential Care Facilities, Assisted Living, Supportive Housing, Transitional Housing, and Special Needs Housing. Non-profit projects within these categories qualify for a 100 percent DIF reduction, while for-profit projects receive an 85 percent reduction. Affordable housing projects do not automatically qualify for fee waivers or reductions unless they meet one of these specified categories.

To further support housing affordability, the City will consider additional fee waivers or reductions for affordable housing as part of Housing Element Program HE 2.4(f). However, decisions on expanding these incentives await updates to the City's traffic model and transportation DIF values to understand the financial implications better.

Applicants must submit requests for DIF reductions or waivers before planning approval or, if no planning permit is required, before building permit issuance. Late requests are denied.

State Requirements

California's Density Bonus Law (Government Code §65915 et seq.) allows for fee waivers, deferrals, and other concessions for qualifying affordable housing projects, incentivizing the development of affordable units by reducing financial barriers.

Recommendations

The following outline some recommendations the City could consider implementing to address these challenges.

- 4.2.a Explore Additional Fee Deferrals:** Explore extended fee deferrals for affordable housing projects beyond the issuance of the Certificate of Occupancy, such as long-term deferrals over a set period (e.g., 20 years) to further alleviate financial barriers for developers.
- 4.2.b Public Resources:** Create an easily accessible resource that outlines criteria, processes, and eligibility for fee reductions, waivers, and deferrals.
- 4.2.c Agency Collaboration:** Collaborate with independent agencies, such as the School District, to explore opportunities for reducing or deferring their fees on affordable housing projects.
- 4.2.d Leverage Impact Fee Adjustments:** Consider refining development impact fee structures to provide additional concessions for innovative housing solutions, such as modular construction or energy-efficient designs.

Housing Element Policies on Special Needs Housing

City Requirements

The City of Goleta promotes housing opportunities for individuals with special needs through targeted policies and programs. HE Program 3.1 Affirmatively Further Fair Housing Opportunities expands affordable housing by utilizing federal, state, and local funding, focusing on lower-income and special needs populations (HE 3.1(a)). This program works to reduce barriers to affordable housing (HE 3.1(a)(2)), support family-oriented housing (HE 3.1(a)(3)), and prioritize vulnerable groups, including individuals with disabilities, seniors, veterans, and foster youth transitioning from care (HE 3.1(a)(4)).

The City facilitates transitional and supportive housing for residential uses, applying the same standards and procedures as other residential developments to streamline approvals (HE 3.2(d)). Small residential care facilities (six or fewer persons) are permitted as family residential uses while zoning amendments will allow larger facilities in designated zones without requiring major conditional use permits (HE 3.2(e)). Housing for farmworkers is permitted in compliance with state law, ensuring access to appropriate accommodations (HE 3.2(f)).

To further promote special needs housing, the City collaborates annually with housing organizations and developers to identify opportunities and provide assistance for grant applications, focusing on housing for individuals with developmental disabilities (HE 3.2(g)). The City also encourages family-friendly amenities in new housing developments, such as recreation areas, play yards, and childcare facilities, to support families with children (HE 3.2(h)).

State Requirements

California has enacted multiple laws to streamline the development and regulation of supportive and special needs housing. AB 2162 requires local jurisdictions to process supportive housing developments by right in zones where multifamily and mixed-use developments are allowed, removing discretionary review under certain conditions. The California Health and Safety Code (§17021.5 and §17021.6) ensures farmworker housing and other special needs housing are treated as residential uses under local zoning laws, protecting their ability to operate without unnecessary restrictions.

Other state laws regulate specific types of special needs housing. AB 2339 (2022) requires jurisdictions to designate adequate zoning for emergency shelters, preventing zoning laws from constraining these facilities. AB 101 (2019) requires cities to allow Low-Barrier Navigation Centers (LBNCs) by right in areas zoned for mixed-use and non-residential uses. California Health and Safety Code §§1500-1567.87 governs Residential Care Facilities (RCFs), setting operational and licensing standards for group homes, adult residential facilities, and skilled nursing facilities. SB 745 (2013) ensures that transitional and supportive housing must be treated as residential use in local zoning codes, preventing discriminatory regulations that could limit their development.

Recommendations

The following recommendations could address challenges related to Special Needs Housing.

- 4.2.e Expand Data Collection:** Include data collection on housing needs for people with developmental disabilities in future Housing Element updates to inform targeted programs and funding opportunities.
- 4.2.f Incentives for Accessible Multigenerational Design:** Offer density bonuses or fee reductions for developers who incorporate accessible multigenerational design features, such as larger units designed for accessibility needs, shared spaces, and flexible layouts. These units should provide adequate space for wheelchair maneuverability, medical equipment storage, and live-in caregivers, ensuring they meet the needs of individuals with disabilities and multigenerational households.
- 4.2.g Inclusive Design Standards:** Establish design guidelines that promote accessibility and adaptability features such as private entrances, adaptive bathrooms, wider doorways, shared common areas for multigenerational families, and adequate space for live-in caregivers.
- 4.2.h Developer Education on Special Needs Housing:** Support training sessions for developers on the diverse housing needs of special needs populations, including individuals with developmental disabilities, the aging population, and other vulnerable groups. Given the significant underrepresentation of housing designed for individuals with developmental disabilities, sessions should include targeted guidance from disability advocates to address their unique accessibility and design needs.
- 4.2.i Integrated Housing Models:** Encourage integrated housing models that combine housing with on-site supportive services, such as vocational training, therapy, and day programs. Given the lack of housing options for individuals with developmental disabilities, efforts should prioritize models that address their specific service and accessibility needs.

Housing Accessibility and Adaptability

City Requirements

The City of Goleta addresses the needs of persons with disabilities and multigenerational households by emphasizing accessibility and adaptability in its housing policies. HE Program 3.1 Affirmatively Further Fair Housing Opportunities program promotes universal design standards in new developments, ensuring housing accessibility for vulnerable populations (HE 3.1). The City also supports researching innovative construction methods to improve cost-efficiency and adaptability in housing design (HE 2.4(g)).

A recent example of this commitment is the City's approval of its first 3D-printed affordable home at 550 Cambridge Drive. Sponsored by the Housing Trust Fund (HTF), this prototype home is a 1,400-square-foot, single-story residence designed using state-of-the-art robotic printing technology. The project aims to serve as a local and regional model for new housing technology that can reduce construction costs, improve sustainability, and accelerate affordable housing production. The home will include energy-efficient systems, drought-tolerant landscaping, and reinforced concrete walls for climate resilience. The

project is a collaboration between HTF, Cambridge Drive Community Church, Apis Cor, and People’s Self-Help Housing.

To further remove barriers, the City has implemented reasonable accommodation procedures that allow individuals with disabilities to request modifications to zoning and building regulations, ensuring inclusive housing opportunities (HE 3.2(i); GMC Chapter 17.63).

State and Federal Requirements

The Fair Housing Act (federal) and California’s Reasonable Accommodation Law require jurisdictions to remove barriers for individuals with disabilities by implementing inclusive zoning regulations and accommodating reasonable requests for housing modifications.

Recommendations

The City could consider the following recommendations to address challenges related to Housing Accessibility and Adaptability for vulnerable communities, developers and housing advocates in Goleta.

- 4.2.j Incentives for Developers to Prioritize Disability-Accessible Housing:** Offer incentives (such as fee waivers, density bonuses, or expedited permitting) for developers who agree to hold accessible units for tenants with disabilities while subsidy processing is completed.
- 4.2.k Develop an Interactive Affordable and Accessible Housing Portal:** Develop an interactive housing dashboard to map affordable and accessible units and guide users through the application process, building off The San Diego Housing Commission’s “Affordable Housing Overview” tool, which provides real-time mapping of affordable housing properties, inclusionary units, and project-based voucher properties. The Goleta tool could expand on this framework by:
 - 4.2.k.1** Mapping available accessible units and filtering by key features (e.g., wheelchair accessibility, roll-in showers, proximity to transit).
- 4.2.l Data Collection and Analysis:** Collaborate with advocacy organizations to understand challenges faced by individuals with special needs—particularly those with developmental disabilities—and explore partnerships for case management, workshops, and other strategies to improve application accessibility.

4.3 Regulations

Inclusionary Housing

City Requirements

The City of Goleta’s Inclusionary Housing chapter of the (GMC Chapter 17.28) establishes specific requirements for developers to include below-market-rate (BMR) housing units in new residential developments. These requirements are intended to promote affordability; however, the strict requirements have posed challenges for developers that have an impact on overall housing production.

Purpose and Intent

The following summarizes the City's purpose and intent for inclusionary housing:

- **Promoting Housing Affordability:** Ensure an adequate supply of affordable housing for persons and households of low and moderate incomes who work or live in the City, addressing the housing affordability crisis and fostering an economically diverse community.
- **Equitable and Sustainable Development:** Support General Plan policies to maintain a balanced mix of workplaces and residential uses that reduce commuting-related air quality impacts and energy consumption, while providing housing options for an economically diverse workforce.
- **Efficient Use of Land:** Avoid depletion of limited land resources by requiring the development of affordable housing when market-rate units are constructed, making the most efficient use of available land.
- **Integration of Affordable Housing:** Prioritize constructing affordable units on the same site as market-rate construction. If infeasible, ensure that off-site affordable units or rehabilitated units are located in neighborhoods of similar character.
- **Streamlined Implementation:** Establish clear standards and procedures to efficiently implement inclusionary housing requirements in compliance with Federal and State law.
- **Additional Incentives:** Encourage the development of affordable housing by offering incentives for projects that exceed minimum affordability requirements under State law.
- **Implementation Hierarchy:** Emphasize the construction of new affordable units on-site as the primary objective, with secondary options such as off-site construction, land dedication, or in-lieu fees to meet housing goals.

Summary of Goleta's Inclusionary Requirements

- **Percentage of Inclusionary Units:**
 - The City mandates that for new housing development projects of five or more units, 20 percent of units must be designated as affordable at various income levels outlined in the City's Housing Element and zoning regulations. The percentage is applied to the total number of dwelling units proposed for a project.
 - The Review Authority may reduce the 20 percent affordability level to 15 percent upon making the required finding that a developer will provide a public benefit exceeding the requirements of Title 17.

The following breakdown reflects the City's requirements for developers, based on whether the affordability level remains at 20 percent or is reduced to 15 percent through review authority adjustments:

- **Base Requirement:** For projects qualifying for a 20% affordability level, the breakdown of units is as follows:
 - **Extremely Low-Income Households:** 2.5% of the total number of units at prices affordable to extremely low-income households.

- **Very Low-Income Households:** 2.5% of the total number of units at prices affordable to very low-income households.
- **Low-Income Households:** 5% of the total number of units at prices affordable to low-income households.
- **Moderate-Income Households:** 5% of the total number of units at prices affordable to moderate-income households.
- **Above Moderate-Income Households (120%–200% of median income):** 5% of the total number of units at prices affordable to above moderate-income households.
- **Reduced Requirement:** For projects that meet the criteria for a reduced affordability level of 15%, the breakdown of units is as follows:
 - **Extremely Low-Income Households:** 1% of the total number of units at prices affordable to extremely low-income households.
 - **Very Low-Income Households:** 1% of the total number of units at prices affordable to very low-income households.
 - **Low-Income Households:** 5% of the total number of units at prices affordable to low-income households.
 - **Moderate-Income Households:** 4% of the total number of units at prices affordable to moderate-income households.
 - **Above Moderate-Income Households (120%–200% of median income):** 4% of the total number of units at prices affordable to above moderate-income households.
- **Rental and Sale Price Limits:** The City imposes strict caps on the sale and rental prices of BMR units as provided in Appendix A. For example:
 - A **three-bedroom unit** designated for extremely low-income households has a **maximum sale price of \$71,300** (2024 limits).
 - For rental units, maximum rents are capped based on income thresholds, such as **\$1,236 per month** for a three-bedroom low-income unit.
- **Off-Site, Land Dedication, or In-Lieu Fees:** If the development of on-site affordable units is infeasible, developers may propose to provide affordable units on another site or dedicate land for the construction of affordable housing as long as it is sufficient to make the development of the affordable units feasible and the off-site location is comparable in character and location to the market-rate development location. The inclusionary housing requirements do not provide clarity as to whether this means that the land valuation of the off-site location must be similar or what exactly is meant by “character and location.”

If unable to provide the required affordable housing on-site, off-site, or through a land dedication, the developer may propose paying an inclusionary housing in-lieu fee payment, acquisition or rehabilitation of existing units, or other alternatives of equal value to the development of affordable units on site. The requirements do not provide clarity as to what “equal value” means, whether it refers to the cost of construction (hard costs, soft costs and land valuation), or the market value of

the unit after construction, or some other definition of “equal value”. Additionally, while the City has conducted a nexus study to justify its in-lieu fee levels, some stakeholders suggest that allowing developers more flexibility, such as paying in-lieu fees without proving infeasibility, could enhance participation and efficiency in meeting affordable housing goals.

State Requirements

The State of California plays a significant role in housing policy through mandates and legislation aimed at increasing housing production and addressing affordability. However, it does not impose direct requirements for inclusionary housing ordinances. Instead, the state provides a framework that cities like Goleta must navigate to ensure their policies align with broader legal and regulatory standards. Provided below are legislative and legal considerations and precedents to consider as it relates to the City’s inclusionary housing chapter as well as potential legal risks to the City based on current requirements.

- **Regional Housing Needs Allocation (RHNA):** California requires cities and counties to plan for their share of regional housing needs through the RHNA process. This includes setting targets for housing production across income levels, including very low, low, moderate, and above-moderate income categories. While RHNA establishes housing goals, it does not mandate exactly how jurisdictions should achieve them, leaving room for local policies like inclusionary housing.
- **Housing Accountability Act (HAA):** The HAA, codified in Government Code Section 65589.5, restricts the ability of local governments to deny or reduce the density of housing projects that comply with applicable zoning and planning requirements. The HAA prohibits local governments from disapproving housing projects or imposing conditions that make projects infeasible unless specific findings are made based on substantial evidence in the record (e.g., adverse public health or safety impacts that cannot be mitigated).

Legal Constraints on Inclusionary Housing Policies

- **Proportionality of Fees and Requirements:** The **Nollan-Dolan standard** established by the U.S. Supreme Court requires that development exactions, such as affordable housing requirements, must be “roughly proportional” to the impact of the development. In *California Building Industry Association v. City of San Jose (2015)*, the California Supreme Court upheld inclusionary housing requirements but noted that they must align with legal standards of proportionality, meaning that any fees or conditions imposed must be proportional to the public impacts of the development and cannot arbitrarily burden developers.
- **Takings Clause (Fifth Amendment):** The U.S. Constitution prohibits the government from taking private property for public use without just compensation. Inclusionary housing ordinances typically do not constitute a “taking” because they impose conditions on development approvals rather than physically appropriating property or denying all economic use of the land. Courts have generally upheld inclusionary housing requirements as serving a legitimate public purpose—addressing housing needs and promoting social equity—which satisfies the “public use” requirement of the Takings Clause.

However, some cases can and have risen to regulatory takings claims when a developer demonstrates that inclusionary requirements make a project economically infeasible or result in a confiscation of economic value. Section 17.28.100 of the GMC addresses this issue by allowing

modifications or waivers if the developer proves that compliance would violate the Takings Clause under the U.S. or California Constitutions. This provision helps safeguard the ordinance from potential legal challenges.

- **California Mitigation Fee Act:** This law requires that development fees be reasonably related to the impact of the project. If inclusionary housing requirements are perceived as excessive or arbitrary, they could be challenged under this act.

Relevant Legislation and Precedents

- **AB 1505 (Palmer Fix):** AB 1505 (2017) clarified that inclusionary housing ordinances are legal in California, even for rental housing, reversing the *Palmer v. City of Los Angeles* (2009) decision. However, it also reinforced the need for ordinances to be reasonable and not overly burdensome.
- **Koontz v. St. Johns River Water Management District (2013):** This U.S. Supreme Court case extended takings clause protections, stating that exactions must have a clear nexus and be proportional to the development's impact. While not specific to housing, it provides a legal framework that can be applied to inclusionary housing policies.
- **Pilling v. City of Healdsburg (2024):** This case involved a challenge to Healdsburg's inclusionary housing ordinance, which imposed a \$20,000 fee on a small-scale housing project. The city ultimately settled, refunding the fee and compensating the developer. The case highlights how inclusionary fees may be contested if they are perceived as excessive, lacking proportionality, or creating undue financial burdens.

Recommendations

To address the issues raised by stakeholders concerning the City's Inclusionary Housing requirements, following are some recommendations to consider for modifications to GMC Chapter 17.28:

- 4.3.a Only Mandate the Construction of Affordable Units Where Subsidies Exist:** Require the construction of affordable units only when the applicant has access to subsidy programs to offset the financial gap; otherwise allow for the payment of an in-lieu fee. The City can help form partnerships between market rate and affordable housing developers to help finance the construction of affordable units. Examples of subsidy programs include the Low-Income Housing Tax Credits (LIHTC) and California Housing Accelerator funds.
- 4.3.b Perform Updates to the Nexus Study Every 5 Years:** The City has already conducted a nexus study to support the justification of its in-lieu fees. The study should be updated every 5 years to ensure that fees remain proportional to construction costs and market trends. Many jurisdictions, such as Oxnard, update their studies every 5–10 years to ensure fees align with housing market realities.
- 4.3.c Allow Developers to Opt for In-Lieu Fees:** The City already permits in-lieu fees in cases where the applicant can demonstrate that constructing affordable housing units is infeasible. A comparative analysis of Goleta's current in-lieu fee levels (first adopted via Resolution No. 21-45 and updated annually) suggests they are more affordable than constructing BMR units, further supporting this recommendation.

- 4.3.d Align Requirements with Market Realities:** Base inclusionary housing requirements on current market conditions, including construction and land costs, rather than using static assumptions. This approach ensures policies remain equitable and effective over time. While the City relies on state affordability numbers, shifting Goleta’s inclusionary housing requirements to calculate maximum sale and rent prices based on square footage rather than bedrooms would align with actual development expenses. Developers incur costs based on square footage, not the number of bedrooms. For example, a large three-bedroom unit (e.g., 1,800 square feet) costs significantly more to build than a smaller one (e.g., 1,200 square feet). A modified pricing structure could limit rent or sale prices to a certain dollar amount per square foot, allowing flexibility based on unit size. While tying sale and rent prices to square footage is uncommon, it has been proposed in jurisdictions such as Los Angeles to better align costs with unit sizes. Goleta could explore pilot programs to determine the feasibility of this model.
- 4.3.e Reassess and Adjust Inclusionary Percentages:** Lower the inclusionary requirement to a more feasible percentage (e.g., 5 to 10 percent) based on financial feasibility studies and consultation with developers. Alternatively, allow the percentage to vary by project type or location, with higher requirements in areas with lower development costs. The following table provides examples from other cities in the region. Importantly, the requirements should align with market realities and cannot require the developer to take a financial loss or render the project financially infeasible.

Table 3: Comparison of Inclusionary Housing Ordinances

City/County	Inclusionary Housing Ordinance	Inclusionary Requirement	In-Lieu Fee	Fee Flexibility
Camarillo	No	—	—	—
City of Ventura	Yes	15% for rental projects; 10% for ownership	\$46.35/sq. ft. for rental; \$29.24/sq. ft. ownership	Deferrals available through agreements
County of Ventura	No	—	—	—
Fillmore	No	—	—	—
Moorpark	Yes		TBD	Fee waivers and deferral requests possible through Development Agreement.
Oxnard	Yes (currently being updated)	10% affordability for 10+ units	\$31,453–\$40,439 per unit	Developers can choose to pay in-lieu fees instead of building on-site.
Thousand Oaks	Yes	5%–10% depending on housing type	\$14.60–\$25.70/sq. ft.	Fee deferrals allowed
Ojai	No	—	—	—

City/County	Inclusionary Housing Ordinance	Inclusionary Requirement	In-Lieu Fee	Fee Flexibility
Port Hueneme	Yes	25% for 10+ units in coastal zone	\$26,500 per unit	—
Santa Paula	Yes	15% based on agreements with City Council	Determined by City Council	Fee deferral program potential for affordable housing assistance through an affordable housing Trust Fund (developed from in-lieu fee payments)

4.3.f Adopt an Above-Base Density Program: Permit inclusionary units to be counted as part of an above-base density bonus. For instance, if base zoning allows 20 units per acre, developers could build an additional 4 units (20 percent of base density) designated as affordable units. This approach ensures market-rate profitability while providing affordable housing.

4.3.g Add Clarity to Key Definitions and Standards: The requirements lacks clarity in several areas, which could lead to inconsistent interpretations and application. Specific recommendations include:

4.3.g.1 Define “Equal Value” Explicitly: Clarify whether “equal value” refers to the cost of constructing affordable units (hard costs, soft costs, and land valuation), the market value of completed units, or another benchmark. This will provide developers with clear expectations and reduce disputes over compliance.

4.3.g.2 Specify “Character and Location” for Off-Site Units: Clearly define what “comparable character and location” means when developers propose off-site affordable units. For example, it could include metrics such as access to transit, schools, and services; neighborhood income levels; and proximity to the market-rate development. Cities like Ventura have defined these terms to include transit access and alignment with neighborhood income demographics.

4.3.g.3 Simplify Fractional Unit Calculations: Provide clear guidance for how developers should address fractional units, such as rounding requirements or combining fractional units across projects to simplify compliance. Include an example of how this would be calculated.

Development Standards

City Requirements and Procedures

The City’s General Plan and Title 17 establish policies and standards that guide development in the City of Goleta, including Residential Density, Height, Lot Coverage, Open Space and Off-Street Parking Requirements. As part of the City’s HE process, the City conducted an analysis of each development standard, it’s potential constraint on development and opportunities/City Initiatives to address the HE constraint.

As part of the City's HE, an evaluation of recent residential projects was also conducted. The evaluation, summarized in Section V of the City's HE – Residential Land Inventory, found that the density for recent multifamily projects varied from 78 to 105 percent the maximum density allowed under the City's land use regulations. This analysis demonstrates that development standards do not prevent housing development projects from achieving maximum allowable densities. However, to improve the feasibility of residential development subprograms HE 2.1 and HE 2.3 were included in the City's Housing Plan to further support residential development. All zoning amendments proposed as part of HE 2.1 and HE 2.3 have been adopted by the City to address constraints to housing development projects. The following sections outline the potential constraints identified in the HE and amendments to address the HE constraint, organized by development standard.

Residential Density

As described in the City's HE, based on input from potential developers, residential density maximums may be an impediment to mixed-use redevelopment of current developed sites in these districts. In order to address this potential impediment, subprogram HE 2.1(a) included a General Plan and Title 17 amendment to increase this maximum residential density in the CC district to 20 du/ac. The City adopted these amendments on December 5, 2023, and December 19, 2023.

Height

Based on previous development, three-story development is viable with a base 35-foot height standard. Several recent developments have included three-story structures, including Heritage Ridge, Old Town Village, Village at Los Carneros, and Hollister Village. The City's HE found that the Coastal Zone height limit of 25 feet in the residential districts may pose an impediment to development at the maximum density. The majority of residential development in residential districts has occurred within the Inland Area, with higher height standards. Additionally, the City's site inventory includes many sites within the OT zone district, with a maximum height of 30 feet. The HE analysis found that this may cause challenges in developing three-story mixed-use redevelopment in this zone. Housing Plan subprogram HE 2.1(h) was included to implement revisions to Title 17 and the General Plan to increase height maximums in these four zones/land use designations to 35 feet in all locations.) On April 16, 2024, the City adopted Ordinance 24-01, that, among other things, amended these height requirements consistent with subprogram HE 2.1(h). Just prior to that, on April 2, 2024, the City adopted accompanying General Plan Amendments (Reso. 24-19, Section 3, Exhibit A).

Lot Coverage

Title 17 used to limit lot coverage to 30 percent in the RP and RM zoning districts and 40 percent in the RH district. Based on recent housing development, the City's lot coverage standards have not been an impediment to housing development in the residential zones. With the existing lot coverage standards, recent development has achieved an average of 92 percent of the maximum density allowed on the site. Nevertheless, on April 16, 2024, as part of various zoning amendments, the City amended Title 17 to increase the lot coverage of RH from 40 to 50 percent in order to facilitate better design and encourage higher density (GMC Table 17.07.030) and amend how lot coverage is defined. Prior to a zoning amendment on June 6, 2023 (Ordinance No. 23-05), lot coverage was measured by a percent of the "net" lot area. This method of defining lot coverage was found in the HE to potentially substantially reduce the development potential on a site. Housing Plan subprogram HE 2.1(i) was included to implement a Title 17 amendment to change the lot coverage methodology to total lot area.

The City's zoning regulations do not include maximum lot coverage regulations for the CC, OT, and CG zoning districts; therefore, there is no possibility for lot coverage restrictions to constrain mixed-use residential development in these districts. That said, lot size requirements could play a larger role in constraining development projects than they previously have in Goleta as higher densities are allowed. This is something the City should keep in mind as allowable densities increase.

Open Space

The City's HE noted that open space standards may be challenging for mixed-use projects, particularly on infill sites and when converting existing development to mixed-use. As such, subprogram HE 2.1(g) included a zoning amendment to reduce open space requirements for mixed-use projects. As part of Ordinance No. 24-05, adopted on December 3, 2024, the City amended the open space requirements for mixed-use residential units included in GMC subsection 17.24.120(A).

Off-Street Parking Requirements

The City's HE noted that excessive parking standards can be a constraint to housing development, particularly affordable units. Developers also mentioned this during stakeholder outreach meetings, conducted in December 2024, as part of this program effort.

As part of the City's HE, existing parking requirements for smaller residential units (studio and one-bedroom units) was identified as a potential constraint on multifamily housing development.

Subprogram HE 2.3(d) was included in the Housing Plan to:

- Reduce parking standards for studio and one-bedroom units to address this potential constraint to the cost and supply of housing,
- Clarify the City's zoning regulations around how the reduction of up to 25 percent from the City's parking requirements for senior housing and income-restricted units is applied, and
- Remove the City's requirement for a Major Conditional Use Permit for a shared parking reduction for mixed-use development.

The City's updated residential off-street parking requirements are summarized below (as detailed in GMC Table 17.38.040(A)).

TABLE 17.38.040(A): REQUIRED ON-SITE PARKING SPACES

Use Classification	Required Parking Spaces and Additional Regulations	
RESIDENTIAL USES		
Single-Unit Dwelling	2 covered spaces per dwelling unit. See Section 17.07.040(B) for exceptions in RS.	
Multiple-Unit Development:		
<i>Studio</i>	1 space per unit.	One covered space must be designated for each unit. One additional guest parking space must be provided for every 3 units. Up to 25% reduction allowed for senior housing and income-restricted units.
<i>One-bedroom units</i>	1.5 spaces per unit.	
<i>Two or more bedrooms</i>	2 spaces per unit.	
Group Residential	1 space per 4 beds, plus 1 for every 10 units.	
Mobile Home Parks	2 spaces per site which may be in tandem, 1 space for every 5 sites for guest parking.	
Residential Care:		
<i>Small</i>	None in addition to what is required for the residential use.	
<i>Large</i>	1 space for every 4 beds.	
Single-Room Occupancy (SRO) Housing	1 space per 2 units.	

Recommendations

In addition to the City initiatives and completed zoning amendments identified in the HE to address constraints to development, the following outline some additional recommendations the City could consider for modification to development standards:

- 4.3.h Increase Height Limits in Targeted Areas:** Permit building heights of 45 to 50 feet in the CC, OT, OI, and CG districts, particularly near High Quality Transit Areas (HQTAs), or major transit stops, to facilitate higher-density mixed-use projects.
- 4.3.i Streamline and Increase Lot Coverage Requirements to Support Feasible Density:** Standardize and increase lot coverage requirements across districts to reduce complexity and help enable developments to be built to maximum density. For example, adopt a uniform coverage standard of 50 to 60 percent for all zones that allow residential uses.
- 4.3.j Tailor Open Space Standards for Mixed-Use and Infill:** Reduce or eliminate open space requirements for units in high-density, HQTAs, near high-quality parks or recreational uses.
- 4.3.k Provide Flexibility in Meeting Open Space Standards:** Permit developers to meet open space requirements through alternative methods, such as rooftop gardens or nearby park improvements off-site.

4.3.1 Manage Off-Street Parking:

- 4.3.1.1 **Eliminate Parking Minimums for Certain Units:** Remove parking minimums for affordable housing projects, studio units, and developments within half a mile of a major transit stop or HQTa.
- 4.3.1.2 **Encourage Car-Free Development:** Evaluate the City's existing considerations for Other Parking Reductions under GMC subsection 17.38.050(C) and consider making these standards objective and by-right, by removing the Conditional Use Permit, Development Plan, or Modification Permit requirements.

5. Conclusion

This report presents a comprehensive analysis of affordable-by-design strategies, regulatory barriers, and opportunities to improve housing affordability, accessibility, and feasibility in the City of Goleta. Several key areas for improvement have been identified through an evaluation of existing policies, stakeholder input, and research on best practices.

Addressing regulatory constraints, streamlining permitting processes, and strengthening partnerships are essential steps to facilitate affordable housing development and reduce costs. Expanding incentives for adaptable, accessible, and multigenerational housing models can ensure that housing meets the needs of all residents, including individuals with disabilities and lower-income households.

Table 4 below summarizes recommended actions proposed throughout the report to support the City's housing goals and help the City advance affordability, accessibility, and housing equity. These recommendations are organized across key focus areas, including process improvements, policy initiatives, and regulatory adjustments, to ensure that housing solutions in Goleta remain sustainable, inclusive, and responsive to community needs.

Table 4: Summary of Recommendations

Recommendation	Description
4.1 PROCESS	
<i>PERMIT STREAMLINING</i>	
4.1.a: Pre-Application Planner Consultation	The City could consider developing a simple handout outlining the City's Pre-Application Review process that they offer. They could add a hyperlink to this handout on their dedicated webpage for Planning and Environmental Review. This could serve to help publicize this information and encourage developers to utilize this process early on.
4.1.b: Ministerial Plan Check Review and Inspection	<p>As described in Section 3.1, developers experience the most significant delays during the plan check review process. There are opportunities to improve the information that is publicly available on the City's website as it relates to the building permit plan check review process and inspections. The information on this webpage is less detailed than the information about Planning and Environmental Review permit applications. Some suggestions for improvement include:</p> <p>4.1.b.1 Common Plan Check Comments Handouts: The City could develop a handout outlining the most common plan check comments that each department issues by permit/project type. This could help applicants, especially developers that haven't already done work in Goleta, understand what the most common plan check issues tend to be by project type and help them prepare a more complete and comprehensive initial building permit application.</p> <p>4.1.b.2 Prioritize Plan Check Review. The City could consider looking at streamlining plan check review for housing development projects and also take into consideration how much affordability is proposed.</p>
4.1.c: Permit Streamlining	During the stakeholder outreach meetings, the cities of Paso Robles and Santa Paula were cited by developers as examples of jurisdictions that are doing a good job of coming up with ways to streamline housing, specifically with their new ODS. As of writing of this report, the City of Goleta has received one application that proposed to utilize the ODS adopted by the City in 2022. The City of Goleta should continue to monitor and evaluate applications they receive that propose to utilize the ODS to understand if there are standards that are more favorable to affordable housing design to facilitate permit streamlining.
<i>PARTNERSHIPS</i>	
4.1.d: Partnerships Info Webpage	To further encourage and promote for-profit and non-profit partnerships, the City could consider adding information to their dedicated webpage for Planning and Environmental Review about for-profit and non-profit partners, including organization names, contact information and links to past projects that have been successful in the City of Goleta. This would enable the information to be more readily available to those interested in learning more about these opportunities in Goleta and exploring these types of partnerships as well as the broader public.
4.2 POLICIES	
<i>FEE DEFERRALS, REDUCTIONS, AND WAIVERS</i>	
4.2.a: Explore Additional Fee Deferrals	Explore extended fee deferrals for affordable housing projects beyond the issuance of the Certificate of Occupancy, such as long-term deferrals over a set period (e.g., 20 years) to further alleviate financial barriers for developers.
4.2.b: Public Resources	Create an easily accessible resource that outlines criteria, processes, and eligibility for fee reductions, waivers, and deferrals.

Recommendation	Description
4.2.c: Agency Collaboration	Collaborate with independent agencies, such as the School District, to explore opportunities for reducing or deferring their fees on affordable housing projects.
4.2.d: Leverage Impact Fee Adjustments	Consider refining development impact fee structures to provide additional concessions for innovative housing solutions, such as modular construction or energy-efficient designs.
<i>HOUSING ELEMENT POLICIES ON SPECIAL NEEDS HOUSING</i>	
4.2.e: Expand Data Collection	Include data collection on housing needs for people with developmental disabilities in future Housing Element updates to inform targeted programs and funding opportunities.
4.2.f: Incentives for Accessible Multigenerational Design	Offer density bonuses or fee reductions for developers who incorporate accessible multigenerational design features, such as larger units designed for accessibility needs, shared spaces, and flexible layouts. These units should provide adequate space for wheelchair maneuverability, medical equipment storage, and live-in caregivers, ensuring they meet the needs of individuals with disabilities and multigenerational households.
4.2.g: Inclusive Design Standards	Establish design guidelines that promote accessibility features such as private entrances, adaptive bathrooms, wider doorways, shared common areas for multigenerational families, and adequate space for live-in caregivers.
4.2.h: Developer Education on Special Needs Housing	Support training sessions for developers on the diverse housing needs of special needs populations, including individuals with developmental disabilities, aging population, and other vulnerable groups. Given the significant underrepresentation of housing designed for individuals with developmental disabilities, sessions should include targeted guidance from disability advocates to address their unique accessibility and design needs.
4.2.i: Integrated Housing Models	Encourage integrated housing models that combine housing with on-site supportive services, such as vocational training, therapy, and day programs. Given the lack of housing options for individuals with developmental disabilities, efforts should prioritize models that address their specific service and accessibility needs.
<i>HOUSING ACCESSIBILITY AND ADAPTABILITY</i>	
4.2.j: Incentives for Developers to Prioritize Disability	Offer incentives (such as fee waivers, density bonuses, or expedited permitting) for developers who agree to hold accessible units for tenants with disabilities while subsidy processing is completed.
4.2.k: Develop an Interactive Affordable and Accessible Housing Portal	<p>Develop an interactive housing dashboard to map affordable and accessible units and guide users through the application process, building off The San Diego Housing Commission’s “Affordable Housing Overview” tool, which provides real-time mapping of affordable housing properties, inclusionary units, and project-based voucher properties. The Goleta tool could expand on this framework by:</p> <p>4.2.k.1 Mapping available accessible units and filtering by key features (e.g., wheelchair accessibility, roll-in showers, proximity to transit).</p>
4.2.l: Data Collection and Analysis	Collaborate with advocacy organizations to understand challenges faced by individuals with special needs—particularly those with developmental disabilities—and explore partnerships for case management, workshops, and other strategies to improve application accessibility.

Recommendation	Description										
4.3 REGULATIONS											
INCLUSIONARY HOUSING											
4.3.a: Only Mandate the Construction of Affordable Units Where Subsidies Exist	Require the construction of affordable units only when the applicant has access to subsidy programs to offset the financial gap; otherwise allow for the payment of an in-lieu fee. The City can help form partnerships between market rate and affordable housing developers to help finance the construction of affordable units. Examples of subsidy programs include the Low-Income Housing Tax Credits (LIHTC) and California Housing Accelerator funds.										
4.3.b: Perform Updates to the Nexus Study Every 5 Years	The City has already conducted a nexus study to support the justification of its in-lieu fees. The study should be updated every 5 years to ensure that fees remain proportional to construction costs and market trends. Many jurisdictions, such as Oxnard, update their studies every 5–10 years to ensure fees align with housing market realities.										
4.3.c: Allow Developers to Opt for In-Lieu Fees	The City already permits in-lieu fees in cases where the applicant can demonstrate that constructing affordable housing units is infeasible. A comparative analysis of Goleta’s current in-lieu fee levels (first adopted via Resolution No. 21-45 and updated annually) suggests they are more affordable than constructing BMR units, further supporting this recommendation.										
4.3.d: Align Requirements with Market Realities	Base inclusionary housing requirements on current market conditions, including construction and land costs, rather than using static assumptions. This approach ensures policies remain equitable and effective over time. While the City relies on state affordability numbers, shifting Goleta’s inclusionary housing requirements to calculate maximum sale and rent prices based on square footage rather than bedrooms would align with actual development expenses. Developers incur costs based on square footage, not the number of bedrooms. For example, a large three-bedroom unit (e.g., 1,800 square feet) costs significantly more to build than a smaller one (e.g., 1,200 square feet). A modified pricing structure could limit rent or sale prices to a certain dollar amount per square foot, allowing flexibility based on unit size. While tying sale and rent prices to square footage is uncommon, it has been proposed in jurisdictions such as Los Angeles to better align costs with unit sizes. Goleta could explore pilot programs to determine the feasibility of this model.										
4.3.e: Reassess and Adjust Inclusionary Percentages	<p>Lower the inclusionary requirement to a more feasible percentage (e.g., 5 to 10 percent) based on financial feasibility studies and consultation with developers. Alternatively, allow the percentage to vary by project type or location, with higher requirements in areas with lower development costs. The following table provides examples from other cities in the region. Importantly, the requirements should align with market realities and cannot require the developer to take a financial loss or render the project financially infeasible.</p> <p>Table 3: Comparison of Inclusionary Housing Ordinances</p> <table><tr><th>City/County</th><th>Inclusionary Housing Ordinance</th><th>Inclusionary Requirement</th><th>In-Lieu Fee</th><th>Fee Flexibility</th></tr><tr><td>Camarillo</td><td>No</td><td>—</td><td>—</td><td>—</td></tr></table>	City/County	Inclusionary Housing Ordinance	Inclusionary Requirement	In-Lieu Fee	Fee Flexibility	Camarillo	No	—	—	—
City/County	Inclusionary Housing Ordinance	Inclusionary Requirement	In-Lieu Fee	Fee Flexibility							
Camarillo	No	—	—	—							

Recommendation	Description				
	City of Ventura	Yes	15% for rental projects; 10% for ownership	\$46.35/sq. ft. for rental; \$29.24/sq. ft. ownership	Deferrals available through agreements
	County of Ventura	No	—	—	—
	Fillmore	No	—	—	—
	Moorpark	Yes		TBD	Fee waivers and deferral requests possible through Development Agreement.
	Oxnard	Yes (currently being updated)	10% affordability for 10+ units	\$31,453–\$40,439 per unit	Developers can choose to pay in-lieu fees instead of building on-site.
	Thousand Oaks	Yes	5%–10% depending on housing type	\$14.60–\$25.70/sq. ft.	Fee deferrals allowed
	Ojai	No	—	—	—
	Port Hueneme	Yes	25% for 10+ units in coastal zone	\$26,500 per unit	—
	Santa Paula	Yes	15% based on agreements with City Council	Determined by City Council	Fee deferral program potential for affordable housing assistance through an affordable housing Trust Fund (developed from in-lieu fee payments)
4.3.f: Adopt an Above-Base Density Program	Permit inclusionary units to be counted as part of an above-base density bonus. For instance, if base zoning allows 20 units per acre, developers could build an additional 4 units (20 percent of base density) designated as affordable units. This approach ensures market-rate profitability while providing affordable housing.				

Recommendation	Description
4.3.g: Add Clarity to Key Definitions and Standards	<p>The requirements lacks clarity in several areas, which could lead to inconsistent interpretations and application. Specific recommendations include:</p> <p>4.3.g.1 Define “Equal Value” Explicitly: Clarify whether “equal value” refers to the cost of constructing affordable units (hard costs, soft costs, and land valuation), the market value of completed units, or another benchmark. This will provide developers with clear expectations and reduce disputes over compliance.</p> <p>4.3.g.2 Specify “Character and Location” for Off-Site Units: Clearly define what “comparable character and location” means when developers propose off-site affordable units. For example, it could include metrics such as access to transit, schools, and services; neighborhood income levels; and proximity to the market-rate development. Cities like Ventura have defined these terms to include transit access and alignment with neighborhood income demographics.</p> <p>4.3.g.3 Simplify Fractional Unit Calculations: Provide clear guidance for how developers should address fractional units, such as rounding requirements or combining fractional units across projects to simplify compliance. Include an example of how this would be calculated.</p>
<i>DEVELOPMENT STANDARDS</i>	
4.3.h: Increase Height Limits in Targeted Areas	Permit building heights of 45 to 50 feet in the CC, OT, OI, and CG districts, particularly near High Quality Transit Areas (HQTAs), or major transit stops, to facilitate higher-density mixed-use projects.
4.3.i: Streamline and Increase Lot Coverage Requirements to Support Feasible Density	Standardize and increase lot coverage requirements across districts to reduce complexity and help enable developments to be built to maximum density. For example, adopt a uniform coverage standard of 50 to 60 percent for all zones that allow residential uses.
4.3.j: Tailor Open Space Standards for Mixed-Use and Infill	Reduce or eliminate open space requirements for units in high-density, HQTAs, near high-quality parks or recreational uses.
4.3.k: Provide Flexibility in Meeting Open Space Standards	Permit developers to meet open space requirements through alternative methods, such as rooftop gardens or nearby park improvements off-site.
4.3.l: Manage Off-Street Parking	<p>4.3.l.1 Eliminate Parking Minimums for Certain Units: Remove parking minimums for affordable housing projects, studio units, and developments within half a mile of a major transit stop or HQTA.</p> <p>4.3.l.2 Encourage Car-Free Development: Evaluate the City’s existing considerations for Other Parking Reductions under GMC subsection 17.38.050(C) and consider making these standards objective and by-right, by removing the Conditional Use Permit, Development Plan, or Modification Permit requirements.</p>

6. References

- Berkeley City Council. 2019.** “Natural Gas Ban Ordinance.” Accessed December 20, 2024. <https://www.cityofberkeley.info/gas-ban-ordinance>.
- Buffalo Common Council. 2017.** “City of Buffalo Unified Development Ordinance: Green Code.” Accessed December 20, 2024. <https://www.buffalony.gov/GreenCode>.
- California Energy Commission. 2024.** *California Electric Homes Program and BUILD Initiatives*. Accessed December 20, 2024. <https://www.energy.ca.gov>.
- California Energy Commission. 2024.** “Energy Upgrade California Program.” Accessed December 20, 2024. <https://www.energyupgradeca.org>.
- CalMatters. 2022, April 18.** *California Must Prioritize People Over Parking*. April 18, 2022. Accessed December 20, 2024. <https://calmatters.org/commentary/2022/04/california-must-prioritize-people-over-parking/>.
- Champlain Housing Trust. 2024.** “Advancing Affordable Housing Through Community Land Trusts.” Accessed December 20, 2024. <https://www.champlainhousingtrust.org>.
- City of Chicago. 2024.** “Accessible Housing Program.” Accessed December 20, 2024. <https://www.chicago.gov/accessible-housing>.
- City of Goleta, Planning and Environmental Review Department. 2023.** *Goleta General Plan/Coastal Land Use Plan Housing Element 2023 to 2031*. Accessed December 20, 2024. <https://www.cityofgoleta.org/your-city/planning-and-environmental-review/advance-planning-division/housing-element-update-2023-2031>.
- City of Goleta. 2023.** *Goleta Gets Its First 3-D House*. February 2023. The Monarch Press. Accessed January 28, 2025. <https://www.goletamonarchpress.com/2023/02/goleta-gets-its-first-3-d-house/>.
- City of San Diego. 2019.** “Parking Reforms for Transit Priority Areas.” Accessed December 20, 2024. <https://www.sandiego.gov/parking-reforms>.
- City of San Diego. 2024.** *Quicker Processing Opportunities*. Accessed December 20, 2024. <https://www.sandiego.gov/development-services/quicker-processing-opportunities>.
- Habitat for Humanity of Southern Santa Barbara County. 2014.** *Canon Perdido Passive House Project*. Accessed January 21, 2024.
- Lincoln Institute of Land Policy. 2015.** *Inclusionary Housing: Creating and Maintaining Equitable Communities*. Accessed December 20, 2024. <https://www.lincolninst.edu/publications/policy-focus-reports/inclusionary-housing-creating-maintaining-equitable-communities>.
- LSA Planning. 2018.** *Local Solutions in Action: Expedited Development Review and Approval Process*. Accessed December 20, 2024. <https://lsaplanning.com/local-solutions-in-action-expedited-development-review-and-approval-process/>.
- Minneapolis City Council. 2018.** “Zoning Code Update: Parking Minimums.” Accessed December 20, 2024. <https://www.ci.minneapolis.mn.us/zoning>.

- Molina, Joshua. 2024.** “Santa Barbara Wrestles with Housing Incentives Outside of Downtown Business District.” *Noozhawk*. December 15, 2024. Accessed December 20, 2024. <https://www.noozhawk.com/>.
- Oakland Community Land Trust. 2024.** “Affordable Housing Programs and Land Trust Initiatives.” Accessed December 20, 2024. <https://www.oakclt.org>.
- Pages Ruiz, Fernando. 2024.** “Building Affordable Houses—20 Years Later.” *Green Building Advisor*. Accessed December 20, 2024. <https://www.greenbuildingadvisor.com/articles/building-affordable-houses-20-years-later>.
- Phillips, Shane, 2020.** *The Affordable City: Strategies for Putting Housing Within Reach (and Keeping it There)*. Island Press.
- San Francisco Public Utilities Commission. 2024.** *Onsite Water Reuse Systems: Non-Potable Water Ordinance*. Accessed December 20, 2024. <https://www.sfpuc.gov/construction-contracts/design-guidelines-standards/onsite-water-reuse>.
- SPUR. 2007.** “Affordable by Design: Creating Middle-Income Housing in San Francisco.” Accessed December 20, 2024. <https://www.spur.org/publications/article/2007-08-01/affordable-design>.
- Terner Center for Housing Innovation. 2024.** *Modeling the Impact of Inclusionary Zoning on Housing Production: Insights from Los Angeles' Transit-Oriented Communities Program*. Accessed December 20, 2024. <https://ternercenter.berkeley.edu/research-and-policy/inclusionary-zoning-housing-production-modeling/>.
- Veterans Village Las Vegas. 2024.** “Affordable Housing for Veterans.” Accessed December 20, 2024. <https://www.veteransvillagelasvegas.org>.
- Zillow. 2024.** Accessed January 29, 2024. https://www.zillow.com/santa-barbara-county-ca/?utm_medium=cpc&utm_source=google&utm_content=12753027270|120177677199|aud-2174784975355:kwd-485533074464|617197971084|&semQue=null&gad_source=1&gclid=CjwKCAiA74G9BhAEEiwA8kNfpZ4AJuQEBZJyMQTkG-8XrsvWpekubnVvM11V5DReG3kc2WbvZhy3jRoCXFwQAvD_BwE.

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Attachment A Maximum Sale and Rental Prices in Goleta



**City of Goleta
Below Market Rate Units
Maximum Sale Prices**

Effective Date: 5/13/2024

	STUDIO	1-BEDROOM	2-BEDROOM	3-BEDROOM	4-BEDROOM
Extremely Low	\$31,100	\$44,500	\$57,900	\$71,300	\$82,000
Very Low	\$93,600	\$115,900	\$138,200	\$160,500	\$178,300
Low	\$129,700	\$157,500	\$185,300	\$213,100	\$235,400
Moderate	\$259,500	\$305,800	\$352,200	\$398,500	\$435,600
Workforce (up to 200% AMI)	\$454,100	\$528,300	\$602,400	\$675,600	\$735,900



City of Goleta
Below Market Rate Units
Maximum Rent Amounts
(per month)

Effective Date: 5/13/2024

	STUDIO	1-BEDROOM	2-BEDROOM	3-BEDROOM	4-BEDROOM
Extremely Low	\$625	\$715	\$804	\$893	\$965
Very Low	\$1,042	\$1,191	\$1,340	\$1,489	\$1,608
Low	\$1,251	\$1,429	\$1,608	\$1,787	\$1,929
Moderate	\$2,084	\$2,382	\$2,680	\$2,978	\$3,216
Workforce (up to 200% AMI)	\$3,335	\$3,811	\$4,288	\$4,764	\$5,145

Attachment 2

Summary of Development Economics and Affordable-by-Design Report Recommendations and Staff Responses

Attachment 2: Summary of Development Economics and Affordable-by-Design Report Recommendations and Staff Responses

Report Recommendation	Description (Summarized from Report)	Staff Response
4.1 PROCESS		
<i>PERMIT STREAMLINING</i>		
4.1.a: Pre-Application Planner Consultation	Develop a handout outlining the City's Pre-Application Review (Planner Consultation) process City offers and add a link to the handout on the City website.	Recommended. Category 2: Procedural Improvements in 2025/2026.
4.1.b: Ministerial Plan Check Review and Inspection	4.1.b.1 Common Plan Check Comments Handouts: Develop a handout outlining the most common plan check comments that each department issues by permit/project type.	Recommended. Category 2: Procedural Improvements in 2025/2026.
	4.1.b.2 Prioritize Plan Check Review. Consider streamlining plan check review for housing development projects, take into consideration how much affordability is proposed.	Recommended. Category 2: Procedural Improvements in 2025/2026. Note: Housing Element Subprogram HE 2.4(h) includes priority processing of applications for 100% affordable housing projects.
4.1.c: Permit Streamlining	Continue to monitor and evaluate applications that utilize objective design standards to understand if there are standards that are more favorable to affordable housing design.	Recommended. Category 2: Procedural Improvements in 2025/2026.
<i>PARTNERSHIPS</i>		
4.1.d: Partnerships Info Webpage	Consider adding information to the City's website about for-profit and non-profit partners, including organization names, contact information and links to past projects that have been successful in the City of Goleta.	Recommended. Category 2: Procedural Improvements in 2025/2026. Note: Recommendation aligns with Housing Element Subprogram HE 2.4(b).

Attachment 2: Summary of Development Economics and Affordable-by-Design Report Recommendations and Staff Responses

Report Recommendation	Description (Summarized from Report)	Staff Response
4.2 POLICIES		
<i>FEE DEFERRALS, REDUCTIONS, AND WAIVERS</i>		
4.2.a: Explore Additional Fee Deferrals	Explore extended fee deferrals for affordable housing projects beyond the issuance of the Certificate of Occupancy, such as long-term deferrals over a set period (e.g., 20 years).	Recommended. Category 1: Implement with General Plan. Note: See Housing Element Subprogram HE 2.4(f), Reduced Impact Fees.
4.2.b: Public Resources	Create an easily accessible resource that outlines criteria, processes, and eligibility for fee reductions, waivers, and deferrals.	Recommended. Category 2: Procedural Improvements in 2025/2026. Note: Update to occur after implementation of Recommendation of 4.2.a and Housing Element Subprogram HE 2.4(f), Reduced Impact Fees.
4.2.c: Agency Collaboration	Collaborate with independent agencies, such as the School District, to explore opportunities for reducing or deferring their fees on affordable housing projects.	Recommended. Category 2: Procedural Improvements in 2025/2026. Note: Such action is consistent with Housing Element Subprogram HE 5.2(a).
4.2.d: Leverage Impact Fee Adjustments	Refine development impact fee structures to provide additional concessions for innovative housing solutions, such as modular construction or energy-efficient designs.	Recommended. Category 1: Implement with General Plan. Note: See Housing Element Subprogram HE 2.4(f), Reduced Impact Fees.
<i>HOUSING ELEMENT POLICIES ON SPECIAL NEEDS HOUSING</i>		
4.2.e: Expand Data Collection	Include data collection on housing needs for people with developmental disabilities in future Housing Element updates.	Recommended. Category 4: Changes to consider for the next Housing Element.
4.2.f: Incentives for Accessible Multigenerational Design	Offer density bonuses or fee reductions for developers who incorporate accessible multigenerational design features, such as larger units designed for accessibility needs, shared spaces, and flexible layouts.	Recommended. Category 1: Implement with General Plan. Note: See Housing Element Subprogram HE 2.4(f), Reduced Impact Fees.

Attachment 2: Summary of Development Economics and Affordable-by-Design Report Recommendations and Staff Responses

Report Recommendation	Description (Summarized from Report)	Staff Response
4.2.g: Inclusive Design Standards	Establish design guidelines that promote accessibility features such as private entrances, adaptive bathrooms, wider doorways, shared common areas for multigenerational families, and adequate space for live-in caregivers.	Recommended. Category 1: Implement with General Plan. Note: Include in General Plan Implementation Action VA-IA-2 (Preparation and Adoption of Design Guidelines). Timing dependent upon City Council work program prioritization.
4.2.h: Developer Education on Special Needs Housing	Support training sessions for developers on the diverse housing needs of special needs populations, including individuals with developmental disabilities, aging population, and other vulnerable groups. Include targeted guidance from disability advocates to address their unique accessibility and design needs.	Not applicable. See Housing Element Subprogram HE 3.1(c) (Fair Housing Education and Training). Category 1: Implement with General Plan.
4.2.i: Integrated Housing Models	Encourage integrated housing models that combine housing with on-site supportive services, such as vocational training, therapy, and day programs. Prioritize models that address their specific service and accessibility needs.	Not applicable. No direct action required. City supports integrated housing models through zoning allowances supportive and transitional housing, low-barrier navigation centers, group residential, single-room occupancy housing, and residential care facilities; City also supported the Buena Tierra supportive housing project and recently approved the Heritage Ridge housing project. Category 1: Implement with General Plan.
<i>HOUSING ACCESSIBILITY AND ADAPTABILITY</i>		
4.2.j: Incentives for Developers to Prioritize Disability-Accessible Housing	Offer incentives (such as fee waivers, density bonuses, or expedited permitting) for developers who agree to hold accessible units for tenants with disabilities while subsidy processing is completed.	Recommended. Category 1: Implement with General Plan. Note: See Housing Element Subprogram HE 2.4(f), Reduced Impact Fees.

Attachment 2: Summary of Development Economics and Affordable-by-Design Report Recommendations and Staff Responses

Report Recommendation	Description (Summarized from Report)	Staff Response
4.2.k: Develop an Interactive Affordable and Accessible Housing Portal	Develop an interactive housing dashboard to map affordable and accessible units and guide users through the application process. 4.2.k.1 Map available accessible units and filtering by key features (e.g., wheelchair accessibility, roll-in showers, proximity to transit).	Recommended. Category 2: Procedural Improvements in 2025/2026. Note: The City maintains a list of below market-rate units and includes a map of these units in the General Plan Annual Progress Report. Implementation of 4.2.k.1 may take longer as the City continues to gather such information.
4.2.l: Data Collection and Analysis	Collaborate with advocacy organizations to understand challenges faced by individuals with special needs—particularly those with developmental disabilities—and explore partnerships for case management, workshops, and other strategies to improve application accessibility.	Not applicable. Category 1: Implement with General Plan. Note: See Housing Element Subprograms HE 3.1(c) and HE 5.2(a).
4.3 REGULATIONS		
<i>INCLUSIONARY HOUSING</i>		
4.3.a: Only Mandate the Construction of Affordable Units Where Subsidies Exist	Require the construction of affordable units only when the applicant has access to subsidy programs to offset the financial gap; otherwise allow for the payment of an in-lieu fee. The City can help form partnerships between market rate and affordable housing developers to help finance the construction of affordable units.	Not recommended at this time. Category 4: Changes to consider for the next Housing Element. Note: Such a change would require amendment Housing Element subprogram HE 2.5(f).
4.3.b: Perform Updates to the Nexus Study Every 5 Years	Update in-lieu fee nexus study every 5 years to ensure that fees remain proportional to construction costs and market trends.	Recommended. Category 2: Procedural Improvements in 2025/2026. Note: In-lieu fees originally adopted in 2021.
4.3.c: Allow Developers to Opt for In-Lieu Fees	Allow developers to opt for in-lieu fees without showing infeasibility of developing on-site.	Not recommended at this time. Category 4: Changes to consider for the next Housing Element. Note: Such a change would require amendment Housing Element subprogram HE 2.5(f).

Attachment 2: Summary of Development Economics and Affordable-by-Design Report Recommendations and Staff Responses

Report Recommendation	Description (Summarized from Report)	Staff Response
4.3.d: Align Requirements with Market Realities	Base inclusionary housing requirements on current market conditions, including construction and land costs, rather than using static assumptions. A modified pricing structure could limit rent or sale prices to a certain dollar amount per square foot, allowing flexibility based on unit size.	Not recommended. Category 5: Not recommended.
4.3.e: Reassess and Adjust Inclusionary Percentages	Lower the inclusionary requirement to a more feasible percentage (e.g., 5 to 10 percent) based on financial feasibility studies and consultation with developers. Alternatively, allow the percentage to vary by project type or location, with higher requirements in areas with lower development costs.	Not recommended at this time. Category 4: Changes to consider for the next Housing Element.
4.3.f: Adopt an Above-Base Density Program	Permit inclusionary units to be counted as part of an above-base density bonus. For instance, if base zoning allows 20 units per acre, developers could build an additional 4 units (20 percent of base density) designated as affordable units.	Not recommended at this time. Category 3: General Plan and Zoning Amendments to Consider in 2027. Note: Action may require a General Plan amendment.
4.3.g: Add Clarity to Key Definitions and Standards	4.3.g.1 Define “Equal Value” Explicitly: Clarify whether “equal value” refers to the cost of constructing affordable units (hard costs, soft costs, and land valuation), the market value of completed units, or another benchmark.	Recommended. Category 2: Procedural Improvements in 2025/2026. Note: Can be considered with next round of Title 17 amendments.
	4.3.g.2 Specify “Character and Location” for Off-Site Units: Clearly define what “comparable character and location” means when developers propose off-site affordable units.	Recommended. Category 2: Procedural Improvements in 2025/2026. Note: Can be considered with next round of Title 17 amendments.
	4.3.g.3 Simplify Fractional Unit Calculations: Provide clear guidance for how developers should address fractional units, such as rounding requirements or combining fractional units across projects to simplify compliance. Include an example of how this would be calculated.	Not recommended. Category 5: Not recommended. Note: Staff does not support change to fractional unit calculations in GMC subsection 17.28.050(B). Instruction on how to combine fractional units is included in that subsection.

Attachment 2: Summary of Development Economics and Affordable-by-Design Report Recommendations and Staff Responses

Report Recommendation	Description (Summarized from Report)	Staff Response
<i>DEVELOPMENT STANDARDS</i>		
4.3.h: Increase Height Limits in Targeted Areas	Permit building heights of 45 to 50 feet in the CC, OT, OI, and CG districts, particularly near High Quality Transit Areas (HQTAs), or major transit stops, to facilitate higher-density mixed-use projects.	Not recommended at this time. Category 3: General Plan and Zoning Amendments to Consider in 2027. Note: Action would require a General Plan amendment.
4.3.i: Streamline and Increase Lot Coverage Requirements to Support Feasible Density	Standardize and increase lot coverage requirements across districts to reduce complexity and help enable developments to be built to maximum density. For example, adopt a uniform coverage standard of 50 to 60 percent for all zones that allow residential uses.	Not recommended at this time. Category 3: General Plan and Zoning Amendments to Consider in 2027. Note: Action would require a General Plan amendment.
4.3.j: Tailor Open Space Standards for Mixed-Use and Infill	Reduce or eliminate open space requirements for units in high-density, HQTAs, near high-quality parks or recreational uses.	Not recommended at this time. Category 3: General Plan and Zoning Amendments to Consider in 2027.
4.3.k: Provide Flexibility in Meeting Open Space Standards	Permit developers to meet open space requirements through alternative methods, such as rooftop gardens or nearby park improvements off-site.	Not recommended at this time. Category 3: General Plan and Zoning Amendments to Consider in 2027.
4.3.l: Manage Off-Street Parking	4.3.l.1 Eliminate Parking Minimums for Certain Units: Remove parking minimums for affordable housing projects, studio units, and developments within half a mile of a major transit stop or HQTA.	Not recommended at this time. Category 3: General Plan and Zoning Amendments to Consider in 2027.
	4.3.l.2 Encourage Car-Free Development: Evaluate the City's existing considerations for Other Parking Reductions under Goleta Municipal Code subsection 17.38.050(C) and consider making these standards objective and by-right, by removing the Conditional Use Permit, Development Plan, or Modification Permit requirements.	Recommended. Category 2: Procedural Improvements in 2025/2026. Note: Staff expect the next round of Title 17 amendments to include clean-ups to subsection 17.38.050. Consideration can be given to provide more reduction options without the need for a discretionary approval.

Attachment 3
Staff Presentation

Affordable Housing Design

March 10, 2025

PC Meeting

Presentation by:

Anne Wells, Advance Planning Manager

Andy Newkirk, Supervising Planner

Molly Cunningham, Assistant Planner

Alison Lenci, Principal Planner ESA

Shannon Wages, Senior Planner ESA



Outline of Report

- Introduction
- What is Affordable-by-Design?
- Stakeholder Outreach Feedback
- Requirements and Recommendations
- Conclusion

HE 2.4(g) Affordable Housing Design: “The City will research affordable design principles, including in collaboration with other agencies and stakeholders, to determine potential viability in the City and pursue regulatory amendments”



Introduction - Purpose

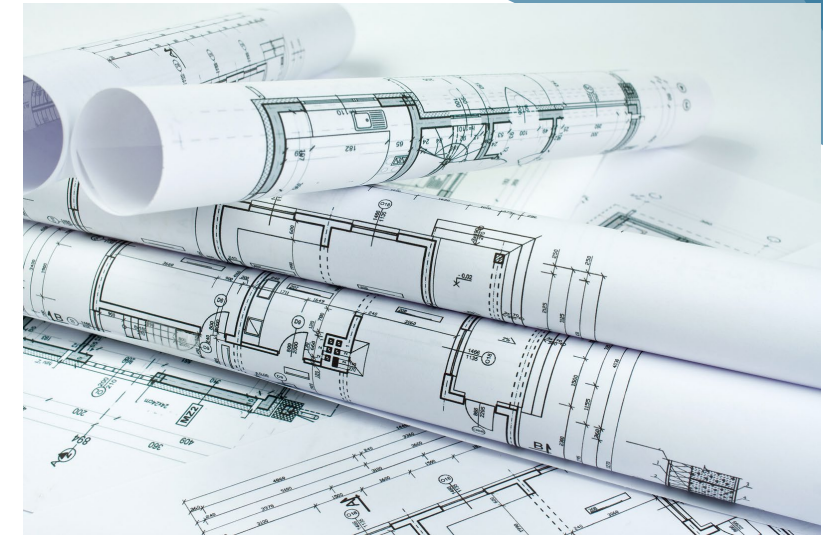
- Research the concept of affordability-by-design, provide input from stakeholders involved in housing in the region, and review the City's policies and regulations related to housing
- Identify critical issues and opportunities within the local housing framework and to present actionable recommendations



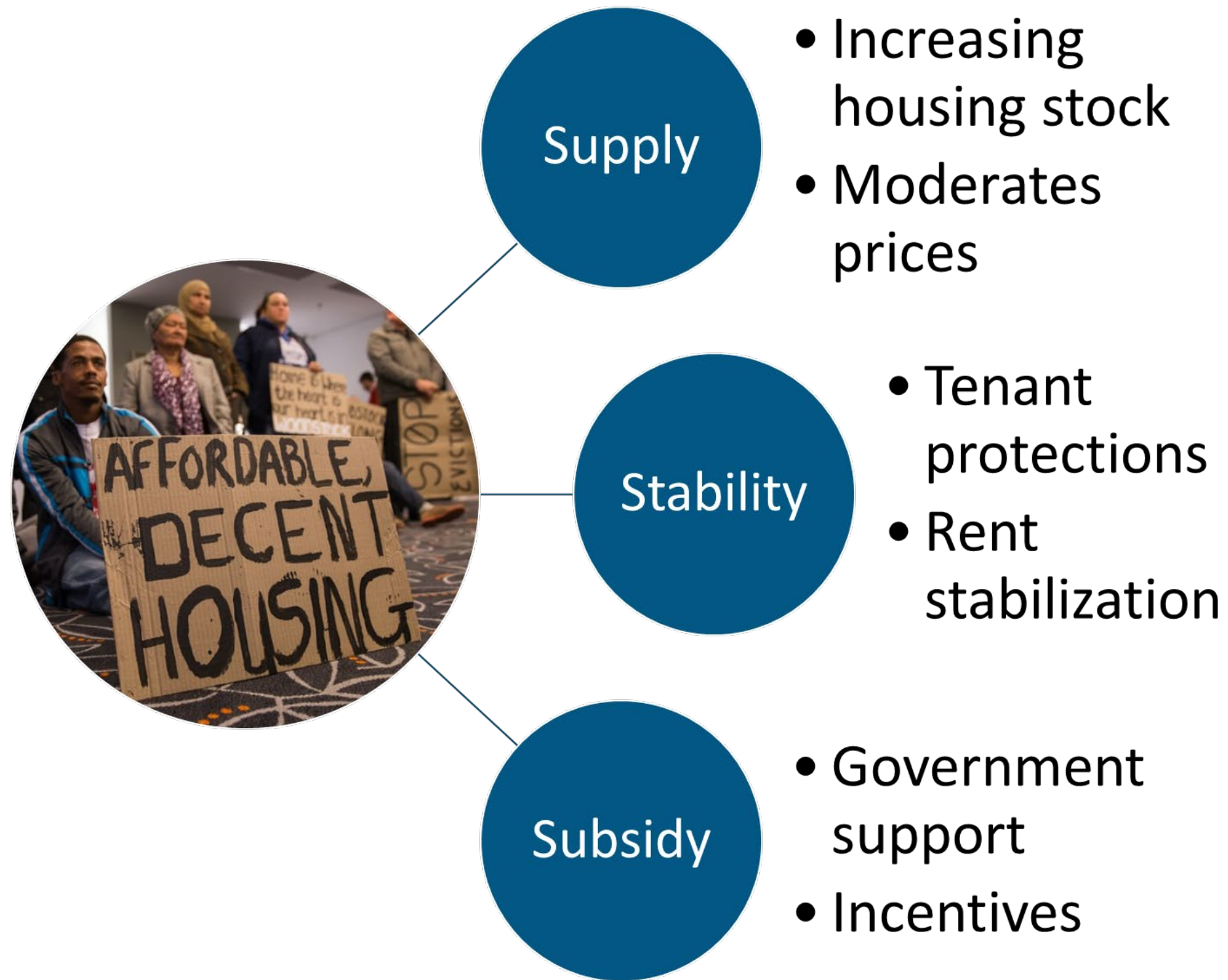
Affordable Housing Design

Affordable housing design refers to housing solutions that:

- Prioritize affordability throughout the development process
- Incorporate elements that reduce costs for both developers and residents
- Ensure that housing is financially accessible without sacrificing quality, durability, or community integration



Systems-Based Approach to Affordable Housing



Topics Analyzed

- Regulatory and procedural practices
- Efficient design concepts
- Utility performance in housing
- Equity and accessibility strategies



Stakeholder Feedback

- Process
 - Permit Streamlining
 - Partnerships
- Policies
 - Fee Deferrals, Reductions and Waivers
 - Housing Element Policies on Special Needs Housing
 - Housing Accessibility and Adaptability
- Regulations
 - Inclusionary Housing Regulations
 - Development Standards



Report Recommendations and Staff Responses to Recommendations

- Report includes an extensive list of recommendations
- City staff provided suggested recommendations for Planning Commission consideration



1. Implement with General Plan

No Planning Commission recommendation needed

Recommendations already fit within existing Housing Element subprograms, or some other policy or implementation action in the General Plan, that staff is working to implement.

4.2.a: Explore Additional Fee Deferrals

4.2.d: Leverage Impact Fee Adjustments

4.2.f: Incentives for Accessible Multigenerational Design

4.2.g: Inclusive Design Standards

4.2.h: Developer Education on Special Needs Housing

4.2.i: Integrated Housing Models

4.2.j: Incentives for Developers to Prioritize Disability-Accessible Housing

4.2.l: Data Collection and Analysis



2. Procedural Improvements in 2025/2026

No Planning Commission recommendation needed

Recommendations can typically be done at the staff level and often can be folded into other initiatives the City is undertaking, often as part of existing Housing Element implementation.

4.1.a: Pre-Application Planner Consultation

4.1.b.1: Ministerial Plan Check Review and Inspection, Common Plan Check Comments Handouts

4.1.b.2: Ministerial Plan Check Review and Inspection, and Prioritize Plan Check Review

4.1.c: Permit Streamlining

4.1.d: Partnerships Info Webpage

4.2.b: Public Resources

4.2.c: Agency Collaboration

4.2.k: Develop an Interactive Affordable and Accessible Housing Portal

4.3.b: Perform Updates to the Nexus Study Every 5 Years

4.3.g.1: Define “Equal Value” Explicitly

4.3.g.2: Specify “Character and Location” for Off-Site Units

4.3.l.2: Manage Off-Street Parking, Encourage Car-Free Development



3. General Plan and Zoning Amendments to Consider in 2027

Planning Commission: Recommendation to consider in 2027

4.3.f: Adopt an Above-Base Density Program

4.3.h: Increase Height Limits in Targeted Areas

4.3.i: Streamline and Increase Lot Coverage Requirements to Support Feasible Density

4.3.j: Tailor Open Space Standards for Mixed-Use and Infill

4.3.k: Provide Flexibility in Meeting Open Space Standards

4.3.l.1: Eliminate Parking Minimums for Certain Units



4. Changes to consider for the next Housing Element

4.2.e: Expand Data Collection **(No Recommendation Needed)**

Planning Commission: Recommendation to consider for next Housing Element (2031)

4.3.a: Only Mandate the Construction of Affordable Units Where Subsidies Exist

4.3.c: Allow Developers to Opt for In-Lieu Fees

4.3.e: Reassess and Adjust Inclusionary Percentages



5. Not Recommended

Planning Commission: Recommendation to not proceed

- 4.3.d: Align Requirements with Market Realities
Not recommended due to concerns that the recommendation runs the risk of incentivizing the creation of larger units (by square footage) at a higher cost (sales prices or rent) for households without providing a commensurate increase in housing occupancy/capacity.
- 4.3.g.3: Simplify Fractional Unit Calculations
Not recommended due to the current fractional unit regulations in the Goleta Municipal Code already providing sufficient clarity



Summary Slide of Staff Recommendation

- Implement Existing General Plan to Support Affordable Design (Category 1): 4.2.a, 4.2.d, 4.2.f, 4.2.g, 4.2.h, 4.2.i, 4.2.j, 4.2.l
- Process Procedural Improvements in 2025/2026 (Category 2): 4.1.a, 4.1.b.1, 4.1.b.2, 4.1.c, 4.1.d, 4.2.b, 4.2.c, 4.2.k, 4.3.b, 4.3.g.1, 4.3.g.2, 4.3.l.2
- Consider General Plan and Zoning Amendments in 2027 (Category 3): 4.3.f, 4.3.h, 4.3.i, 4.3.j, 4.3.k, 4.3.l.1
- Expand Data Collection and Consider Changes to Inclusionary Policy in Preparation of Next Housing Element (Category 4): 4.2.e, 4.3.a, 4.3.c, 4.3.e
- Not recommended (Category 5): 4.3.d, 4.3.g.3



Commission Questions and Recommendations

Reference Slides

Report Recommendation	Description (Summarized)	Staff Response
4.1 Process		
PERMIT STREAMLINING		
4.1.a: Pre-Application Planner Consultation	Develop a handout outlining the City’s Planner Consultation process, add a link to the handout on the City website.	Recommended (2025/2026).
4.1.b: Ministerial Plan Check Review and Inspection	4.1.b.1. Common Plan Check Comments Handouts: Develop a handout outlining the most common plan check comments that each department issues by permit/project type.	Recommended (2025/2026).
	4.1.b.2. Prioritize Plan Check Review. Consider streamlining plan check review for housing development projects, take into consideration how much affordability is proposed.	Recommended (2025/2026). Note: HE 2.4(h) includes priority processing of applications for 100% affordable housing projects.
4.1.c: Permit Streamlining	Continue to monitor and evaluate applications that utilize objective design standards to understand if there are standards that are more favorable to affordable housing design.	Recommended (2025/2026).
PARTNERSHIPS		
4.1.d: Partnerships Info Webpage	Consider adding information to the City’s website about for-profit and non-profit partners, including organization names, contact information and links to past projects that have been successful in the City of Goleta.	Recommended (2025/2026). Note: Aligns with HE 2.4(b).

Report Recommendation	Description (Summarized)	Staff Response
4.2 Policies		
FEE DEFERRALS, REDUCTIONS, AND WAIVERS		
4.2.a: Explore Additional Fee Deferrals	Explore extended fee deferrals for affordable housing projects beyond the issuance of the Certificate of Occupancy, such as long-term deferrals over a set period (e.g., 20 years).	Recommended (Implement with General Plan). Note: See HE 2.4(f), Reduced Impact Fees.
4.2.b: Public Resources	Create an easily accessible resource that outlines criteria, processes, and eligibility for fee reductions, waivers, and deferrals.	Recommended (2025/2026). Note: After implementation of HE 2.4(f), Reduced Impact Fees.
4.2.c: Agency Collaboration	Collaborate with independent agencies, such as the School District, to explore opportunities for reducing or deferring their fees on affordable housing projects.	Recommended (2025/2026). Note: Consistent with Housing Element Subprogram HE 5.2(a).
4.2.d: Leverage Impact Fee Adjustments	Refine development impact fee structures to provide additional concessions for innovative housing solutions, such as modular construction or energy-efficient designs.	Recommended (Implement with General Plan). Note: See HE 2.4(f), Reduced Impact Fees.



Report Recommendation	Description (Summarized)	Staff Response
4.2 Policies		
HOUSING ELEMENT POLICIES ON SPECIAL NEEDS HOUSING		
4.2.e: Expand Data Collection	Include data collection on housing needs for people with developmental disabilities in future Housing Element updates.	Recommended (consider for next Housing Element).
4.2.f: Incentives for Accessible Multigenerational Design	Offer density bonuses or fee reductions for developers who incorporate accessible multigenerational design features, such as larger units designed for accessibility needs, shared spaces, and flexible layouts.	Recommended (Implement with General Plan). Note: See HE 2.4(f), Reduced Impact Fees.
4.2.g: Inclusive Design Standards	Establish design guidelines that promote accessibility features such as private entrances, adaptive bathrooms, wider doorways, shared common areas for multigenerational families, and adequate space for live-in caregivers.	Recommended (Implement with General Plan). Note: General Plan Implementation Action VA-IA-2 (Preparation and Adoption of Design Guidelines).



Report Recommendation	Description (Summarized)	Staff Response
4.2 Policies		
HOUSING ELEMENT POLICIES ON SPECIAL NEEDS HOUSING		
4.2.h: Developer Education on Specials Needs Housing	Support training sessions for developers on the diverse housing needs of special needs populations, including individuals with developmental disabilities, aging population, and other vulnerable groups. Include targeted guidance from disability advocates to address their unique accessibility and design needs.	Recommended (Implement with General Plan). Note: HE 3.1(c) (Fair Housing Education and Training).
4.2.i: Integrated Housing Models	Encourage integrated housing models that combine housing with on-site supportive services, such as vocational training, therapy, and day programs. Prioritize models that address their specific service and accessibility needs.	Not applicable. No direct action required.



Report Recommendation	Description (Summarized)	Staff Response
4.2 Policies		
HOUSING ACCESSIBILITY AND ADAPTABILITY		
4.2.j: Incentives for Developers to Prioritize Disability	Offer incentives (such as fee waivers, density bonuses, or expedited permitting) for developers who agree to hold accessible units for tenants with disabilities while subsidy processing is completed.	Recommended (Implement with General Plan). Note: See HE 2.4(f), Reduced Impact Fees.
4.2.k: Develop an Interactive Affordable and Accessible Housing Portal	Develop an interactive housing dashboard to map affordable and accessible units and guide users through the application process. 4.2.k.1 Map available accessible units and filtering by key features (e.g., wheelchair accessibility, roll-in showers, proximity to transit).	Recommended (2025/2026). Note: Implementation of 4.2.k.1 may take longer as the City continues to gather such information.
4.2.l: Data Collection and Analysis	Collaborate with advocacy organizations to understand challenges faced by individuals with special needs—particularly those with developmental disabilities—and explore partnerships for case management, workshops, and other strategies to improve application accessibility.	Not applicable. Note: See Housing Element Subprograms HE 3.1(c) and HE 5.2(a).

Report Recommendation	Description (Summarized)	Staff Response
4.3 Regulations		
INCLUSIONARY HOUSING		
4.3.a: Only Mandate the Construction of Affordable Units Where Subsidies Exist	Require the construction of affordable units only when the applicant has access to subsidy programs to offset the financial gap; otherwise allow for the payment of an in-lieu fee.	Not recommended at this time (consider for next Housing Element). Note: Would require amendment Housing Element subprogram HE 2.5(f).
4.3.b: Perform Updates to the Nexus Study Every 5 Years	Update in-lieu fee nexus study every 5 years to ensure that fees remain proportional to construction costs and market trends.	Recommended (2025/2026). Note: In-lieu fees originally adopted in 2021.
4.3.c: Allow Developers to Opt for In-Lieu Fees	Allow developers to opt for in-lieu fees without showing infeasibility of developing on-site.	Not recommended at this time (consider for next Housing Element). Note: Would require amendment Housing Element subprogram HE 2.5(f).
4.3.d: Align Requirements with Market Realities	Base inclusionary housing requirements on current market conditions, including construction and land costs, rather than using static assumptions. A modified pricing structure could limit rent or sale prices to a certain dollar amount per square foot, allowing flexibility based on unit size.	Not recommended.
4.3.e: Reassess and Adjust Inclusionary Percentages	Lower the inclusionary requirement to a more feasible percentage (e.g., 5 to 10 percent) based on financial feasibility studies and consultation with developers. Alternatively, allow percentage to vary by project type or location, with higher requirements in areas with lower development costs.	Not recommended at this time (consider for next Housing Element). Note: Would require amendment Housing Element subprogram HE 2.5(f).

Report Recommendation	Description (Summarized)	Staff Response
4.3 Regulations		
INCLUSIONARY HOUSING		
4.3.f: Adopt an Above-Base Density Program	Permit inclusionary units to be counted as part of an above-base density bonus. For instance, if base zoning allows 20 units per acre, developers could build an additional 4 units (20 percent of base density) designated as affordable units.	Not recommended at this time (consider in 2027).
4.3.g: Add Clarity to Key Definitions and Standards	4.3.g.1. Define “Equal Value” Explicitly: Clarify whether “equal value” refers to the cost of constructing affordable units (hard costs, soft costs, and land valuation), the market value of completed units, or another benchmark.	Recommended (2025/2026). Note: Can be considered with next round of Title 17 amendments.
	4.3.g.2. Specify “Character and Location” for Off-Site Units: Clearly define what “comparable character and location” means when developers propose off-site affordable units.	Recommended (2025/2026). Note: Can be considered with next round of Title 17 amendments.
	4.3.g.3. Simplify Fractional Unit Calculations: Provide clear guidance for how developers should address fractional units, such as rounding requirements or combining fractional units across projects to simplify compliance. Include an example of how this would be calculated.	Not recommended.

Report Recommendation	Description (Summarized)	Staff Response
4.3 Regulations		
DEVELOPMENT STANDARDS		
4.3.h: Increase Hight Limits in Targeted Areas	Permit building heights of 45 to 50 feet in the CC, OT, OI, and CG districts, particularly near High Quality Transit Areas (HQTAs), or major transit stops, to facilitate higher-density mixed-use projects.	Not recommended at this time (consider in 2027).
4.3.i: Streamline and Increase Lot Coverage Requirements to Support Feasible Density	Standardize and increase lot coverage requirements across districts to reduce complexity and help enable developments to be built to maximum density. For example, adopt a uniform coverage standard of 50 to 60 percent for all zones that allow residential uses.	Not recommended at this time (consider in 2027).
4.3.j: Tailor Open Space Standards for Mixed-Use and Infill	Reduce or eliminate open space requirements for units in high-density, HQTAs, near high-quality parks or recreational uses.	Not recommended at this time (consider in 2027).



Report Recommendation	Description (Summarized)	Staff Response
4.3 Regulations		
DEVELOPMENT STANDARDS		
4.3.k: Provide Flexibility in Meeting Open Space Standards	Permit developers to meet open space requirements through alternative methods, such as rooftop gardens or nearby park improvements off-site.	Not recommended at this time (consider in 2027).
4.3.l: Manage Off-Street Parking	4.3.l.1. Eliminate Parking Minimums for Certain Units: Remove parking minimums for affordable housing projects, studio units, and developments within half a mile of a major transit stop or HQTA.	Not recommended at this time (consider in 2027).
	4.3.l.2. Encourage Car-Free Development: Evaluate the City’s existing considerations for Other Parking Reductions under Goleta Municipal Code subsection 17.38.050(C) and consider making these standards objective and by-right, by removing the Conditional Use Permit, Development Plan, or Modification Permit requirements.	Recommended (2025/2026). Note: Can be considered with next round of Title 17 amendments.

