



Housing Authority of the County of Santa Barbara

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April 10, 2019

Planning Commission  
City of Lompoc  
100 Civic Center Dr.  
Lompoc, CA 93436

**RE: Proposed Comprehensive General Plan Amendments, Zone Changes, and Amendments to Title 17 of the Lompoc Municipal Code**

Dear Planning Commission:

The Housing Authority of the County of Santa Barbara (“Housing Authority”) owns and manages the Cypress Court Affordable Senior Housing property (APN 085-150-090) and the Cypress & 7th property (APN 085-150-089). The proposed General Plan and Zoning Map amendments for these properties, Draft Resolution Nos. 905(19) and 906(19), would cause undue hardship in the Housing Authority’s ongoing management of Cypress Court, and in the creation of new affordable housing on the Cypress & 7th property. As a long-time stakeholder in the Lompoc community, and the developer and manager of over 474 units of affordable housing within the City, we respectfully request that Planning Commission make the following changes to the proposed General Plan and Zoning Map amendments for these properties (GP-17-01 and ZC 15-02):

1. The Cypress Court property is currently proposed to be amended from the Office Commercial (OC) General Plan designation and Commercial Office (CO) Zoning Map designation, to partly General Commercial with a Planned Commercial Development zone, and partly High Density Residential (HDR) with an R-3 zone.

A rezone of the residential portion of the Cypress Court property to R-3 would render the structure non-conforming, and will cause undue hardships for future refinancing of the project because affordable housing lenders are often unable or unwilling to provide loans for non-conforming structures, or charge higher fees and interest rates than for comparable conforming structures.

For these reasons we respectfully request that the Planning Commission not rezone the Cypress Court property, or only rezone the residential portion of the property to Mixed-Use in order to allow the existing building to remain in conformance with development standards. Alternatively, we request that the zoning ordinance standards for the R-3 zone be amended to allow a maximum front setback of 5 ft., a maximum height limit of 40 feet, and maximum density of 27 du/ac.

2. The Cypress & 7th property is currently pending approval of a CUP under the existing CO zone for the development of a 15-unit affordable housing development. The application was deemed complete on December 21, 2018, and was considered by the Planning Commission on February 19, 2019. At that hearing, the Planning Commission moved to continue the project to the June

Planning Commission hearing in an attempt to allow the subject General Plan and zoning ordinance amendments to be approved by the City Council.

However, the proposed down zoning of the site from CO to Medium Density Residential (R-2) would render the proposed project infeasible, as it would result in a substantial reduction in the allowed number of affordable units. For these reasons, we respectfully request that the City not rezone the property, or only change the zoning to Mixed-Use or HDR (R-3).

We further request that the Planning Commission take into consideration all State laws applicable to the proposed down-zoning of these properties, including but not limited to the Least Cost Zoning Law (Government Code § 65913.1), the Housing Accountability Act (Government Code §65589.8), and Government Code section 65008 (prohibiting, *inter alia*, a city's discrimination against a residential development because it is intended for occupancy by persons and families of low and moderate income).

We appreciate the Planning Commission's consideration of our requests herein, and hope to continue to engage with the City in order to come to a more reasonable resolution of the proposed General Plan and Zoning Map amendments that will encourage the ongoing management and proposed development of affordable housing opportunities on these two properties.

Sincerely,



Robert P. Havlicek, Jr., Executive Director  
Housing Authority of the County of Santa Barbara