



# City of Santa Barbara California

## PLANNING COMMISSION STAFF REPORT

**REPORT DATE:** April 4, 2013  
**AGENDA DATE:** April 11, 2013  
**PROJECT TITLE:** Draft Zoning Ordinance Amendments Related to the Implementation of the Average Unit-Size Density Incentive Program  
**TO:** Planning Commission  
**FROM:** Planning Division, (805) 564-5470  
 Bettie Weiss, City Planner *BLW*  
 John Ledbetter, Principal Planner *JL*  
 Irma Unzueta, Project Planner *IU*

### I. RECOMMENDATION

That the Planning Commission review and forward a recommendation to the City Council regarding the draft Zoning Ordinance language for the Average Unit-Size Density (AUD) Incentive Program.

### II. BACKGROUND

The AUD Program is directed by policies in the Land Use and Housing Elements of the General Plan and Council Resolution No. 09-058, and is intended to replace the existing Variable Density Program. The existing Variable Density provisions would be suspended during the AUD Program trial period.

Projects developed or approved under the current variable density provisions prior to the adoption of the AUD Program would remain legal and conforming land uses. Projects developed using variable density standards would be permitted to add floor area if it does not result in additional units or bedrooms, unless such additions conform to base density. Existing variable density projects could convert to AUD units if all applicable standards of the AUD Program are met. However, existing variable density projects could not demolish and rebuild under Variable Density standards.

The AUD Program is proposed to encourage smaller, more affordable units through established unit sizes in selected areas of the City (Exhibit A). It allows increased residential density incentives and flexibility of development standards, such as reduced parking requirements, to facilitate the construction of smaller residential units, particularly priority housing. Priority housing includes rental, employer sponsored housing and limited equity housing cooperatives.

On April 10, 2012, the City Council initiated Zoning Ordinance amendments to implement the AUD Program. As directed by City Council, following adoption the AUD Program will be in effect for eight years, or once 250 units have been developed in the High Density areas, whichever occurs sooner. Prior to the end of the 8-year trial period, the Council will consider whether to extend or modify the Program. If the AUD Program is not extended or modified,

the residential density will revert back to the Variable Density standards in place prior to adoption of the 2011 General Plan Update.

To formulate the mechanics of the AUD Program, Staff collaborated with a technical advisory group of community members. Specific areas of collaboration included average unit size ranges, priority housing parameters, and flexibility in development standards, including setback, open space and parking requirements. The key components of the AUD Program and proposed ordinance amendments were then presented to the Planning Commission, Architectural Board of Review and Historic Landmarks Commission in July and August of 2012.

Interest in the City's proposed Employer Sponsored Housing Program prompted the City to hold a community forum on September, 12, 2012 to begin the necessary dialogue with employers, developers and lenders to identify what is needed to create a viable and successful program. The forum included a panel discussion with community representatives who have experience in the provision of workforce housing. The benefits and challenges of an Employer Sponsored Housing Program were discussed and recommendations on ways to facilitate the viability and success of this program were identified.

Because the success of this program is dependent on employer participation, the forum served as the initial discourse between the City and local businesses regarding the opportunities and benefits that could be derived by participating in the program. Potential challenges of the program were also discussed and ideas to reduce them were identified and recommended by the forum panel. Please refer to Exhibit B for a detailed account of the forum panel discussion and recommendations.

### **III. DISCUSSION**

The key components of the AUD Program have been presented to the Planning Commission, Architectural Board of Review and Historic Landmark Commission for discussion and feedback. A brief summary of this review and the related proposed ordinance text changes are provided below. The Draft Average Unit-Size Density Incentive Program Ordinance (Chapter 28.20) is included as Exhibit C.

#### **AVERAGE UNIT SIZE RANGES AND DENSITIES**

The Variable Density program calculates residential density based on the number of bedrooms. Because the program did not regulate the size of the units, the Variable Density program unintentionally resulted in larger units and buildings. The AUD Program would regulate residential density based on the average unit size, and is designed to produce smaller units and smaller buildings located primarily in and around the Downtown.

The AUD Program is proposed for the Medium-High and High Density designated areas of the City. The Priority Housing Overlay can be applied in the High Density areas and the C-M Zone (Commercial Manufacturing) for additional residential densities when the development qualifies as a Community Benefit housing project, including rentals, employer sponsored housing, and limited equity housing cooperatives.

As part of the General Plan Update adoption in December 2011, the City Council approved density ranges for the Medium-High (15-27 du/ac) and High Density (28-36 du/ac)

designations, as well as the Priority Housing Overlay (37-63 du/ac) with maximum average unit sizes for each density (Exhibit D). Please note that while each density range identifies a maximum average unit size (not to be exceeded), it does not preclude a project from proposing a lower average unit size. For example, a Medium High Density project proposing development at 25 du/ac may not exceed a maximum average unit size of 870 square feet, but could propose a lower maximum average unit size (e.g., 500 square feet).

Note that the base density for multi-family and commercial zones (where residential is allowed) will continue to be a range of 12-18 dwelling units per acre based on zoning standards. Projects that develop at the base density are exempted from the minimum density requirements of the Medium-High and High Density designations and are not subject to unit size limitations. However, such projects cannot apply the minimum one parking space per unit or other development standard incentives allowed by the AUD Program.

## **HOUSING TYPES**

One of the primary goals of the General Plan Update is to encourage the production of affordable workforce housing, specifically rental, employer sponsored housing, and limited equity housing cooperatives. Such housing is considered a community benefit land use and supported by numerous policies and programs in both the Land Use and Housing Elements. These types of multi-unit housing fall into two categories: market rate units and priority housing, which is achieved through the Priority Housing Overlay.

### **Market Rate Units**

Market rate units are permitted under the AUD Program. These units would likely be constructed in the Medium-High and High Density designated areas, and in exchange would be required to provide smaller unit sizes to qualify for the density and development standard incentives allowed under the program. Also, market rate units, excluding employer sponsored housing, would be subject to the inclusionary housing ordinance.

### **Priority Housing**

The primary objective of the Priority Housing Overlay is to encourage the construction of long-term affordable housing, with special emphasis on rental units, employer sponsored housing, limited equity housing cooperatives. This type of housing is considered a community benefit and therefore could be allowed increased densities of up to 63 dwelling units per acre under the AUD Program.

- **Rental Units:** Rental units developed under the AUD Program would not be price or income restricted. However, in order to qualify for the Priority Housing Overlay density incentives allowed under the AUD Program, the owner must agree to maintain the units as rental for the life of the project.
- **Employer Sponsored Housing:** This type of housing is developed by an employer or group of employers and the units dedicated to households that include at least one person who works on the south coast region (from the city of Carpentry, to, and including the City of Goleta) of Santa Barbara County. In order to qualify for the density and development standard incentives allowed under the AUD Program, the owner(s) must limit the

occupancy of the residential units to include at least one person who works on the south coast region of Santa Barbara County for the life of the project.

- **Limited Equity Housing Cooperative:** This type of housing is defined as shared ownership of the entire project where individuals occupy one unit and take part in management decisions. Limited equity housing cooperatives restrict resale price, which helps maintain a specified level of affordability to subsequent shareholders. In order to qualify for the density incentives allowed under the AUD Program, a limited equity housing cooperative must be affordable to households earning from 120% to 250% of the Area Median Income as defined in the City's Affordable Housing Policies and Procedures.

## DEVELOPMENT STANDARDS

### Parking Requirements

The City Council has authorized that projects developed under the AUD Program can provide a minimum of one parking space per residential unit and would not be required to provide guest parking. The intent is to facilitate unit affordability and help decrease building mass. Reduced parking requirements are consistent with policies of the Housing Element (H17 and H17.1) that support flexibility in development standards to facilitate additional housing.

### Variable Setbacks

Currently, the C-2 and C-M zones do not require a front setback. Implementation Action LG12.3 of the General Plan Land Use Element encourages the variation of building setbacks along street frontages as it would support the City's urban forest and help soften buildings. The AUD Program ordinance includes a provision to implement a 5-foot variable front yard setback for AUD mixed use projects developed in commercial zones in which there currently is no front yard setback required (excluding State Street and first blocks of cross streets between Montecito and Sola Streets). Exclusively residential developments would apply the R-3/R-4 setback requirements of the AUD Program ordinance. The ordinance would not have any effect on existing developments.

### Open Space Requirements

There are two methods of applying outdoor living space requirements to multi-family or mixed use projects. Projects have the option of selecting either one of these methods.

**Method A:** The Private Outdoor Living Space Method (SBMC § 28.21.081.A) requires projects to provide all three of the following:

- A private outdoor living space for each dwelling unit (with specific requirements);
- An on-grade open space area of not less than 10% of the net lot area; and
- A common open area with minimum dimensions of 15'x 15'

Staff recommends eliminating the 10% open space requirement for mixed use projects developing under the AUD Program. Offering this incentive will provide flexibility in project design, thus facilitating additional residential units as part of the project. Since the 10% open space requirement was originally intended for residential uses in the multi-family zones, not

mixed use projects in commercial zones, Staff believes that eliminating this requirement would be a reasonable incentive in order to gain additional affordable and workforce units.

In July and August 2012, Staff reviewed the proposed open space changes with the Planning Commission and Design Review Boards. Although concern was expressed that eliminating the 10% requirement might raise neighborhood compatibility issues, Staff views this as an appropriate incentive to encourage the construction of smaller, more affordable units intended for lower income and workforce households. In addition, the implementation of the proposed 5-foot variable setbacks along street frontages in the C-2 and C-M zones would help to offset the elimination of the 10% open space area requirement.

**Method B:** The Common Outdoor Living Space Method (SBMC § 28.21.081.B) requires projects to provide a common outdoor living space of at least 15 percent of the net lot area, adhering to the following requirements:

- The area must be on-grade;
- The area may be provided on multiple locations;
- At least one location must have a dimension of 20' x 20'; and
- The area may include the interior and rear yard setbacks, but not the front yard

Providing the 15% common outdoor living space on grade has been problematic for projects proposing at-grade parking garages. In order to accommodate the 15% common outdoor living space requirement on the ground, projects must decrease building square footage, which could result in a reduced number of residential units. Developments with fewer units do less to address the current jobs/housing balance, which is counter to a fundamental principle of *Plan Santa Barbara*, to encourage additional residential units, especially for lower income and workforce households.

In the past, the common outdoor living space requirement has been effectively met on upper floors through the use of zoning modifications. Therefore, Staff recommends that this requirement be modified to allow flexibility in the location where the common outdoor living space is provided for AUD mixed use projects applying this requirement. In addition, Staff is proposing that the 15% common outdoor living space requirement be reduced to 10% for projects developing under the AUD program, and within ¼ mile from a park. These amendments are supported by Housing Element Implementation Action H17.2 allowing flexibility in how, where and the extent of outdoor living space required for housing development in commercial zones.

#### **Distance Between Buildings**

Exclusively residential or mixed use AUD projects would be allowed to reduce the distance between buildings on the same lot requirement, from 15 feet to 10 feet. Reducing this requirement is intended to facilitate the construction of additional housing units.

#### **Building Height**

The recently adopted General Plan Update includes Implementation Action LG12.4 directing that zoning standards be amended to require special findings and super majority (five

affirmative votes) approval by the Planning Commission for Community Benefit projects that exceed 45 feet in height. Currently only the C-2, C-M, M-1 and OM-1 zones allow building heights over 45 feet. These zones permit a height of four stories, not to exceed 60 feet. Amendments to the building height provisions of these zoning districts are proposed to restrict building heights to 45 feet unless the project is a Community Benefit project. For the purposes of the AUD Program a Community Benefit housing project would include, Affordable units, rental units, employer sponsored housing, limited equity housing cooperatives, and transitional or special needs housing.

In addition, projects developing under the AUD Program, but not a Community Benefit housing project (e.g., market rate condominiums) would be permitted four stories, not to exceed 45 feet in height. These projects would likely be developed in the R-3 and R-4 zone, which currently restricts buildings to three stories and 45 feet in height.

### **Building Height Findings**

In addition to findings required of the project application, possible criteria to be used by the Planning Commission in approving AUD projects that exceed 45 feet in height include:

- ***Demonstrated Need:*** The applicant has demonstrated a need for the project to exceed 45 feet in building height that is related to the project's benefit to the community, site constraints, or desired architectural qualities, as opposed to a purely financial justification.
- ***Architecture and Design:*** The project exhibits exemplary design and incorporates characteristics distinctive to the City of Santa Barbara.
- ***Sensitivity to Context:*** The project recognizes and complements the setting and character of the neighboring properties with superior sensitivity to adjacent federal, state, and City landmarks and other nearby designated historic resources, including City structures of merit, sites, or natural features.

## **IV. PERFORMANCE MEASURES**

Possible criterion to measure how successful the AUD Program has been during the trial period and also to gauge the program's long-term viability could include the following:

- Number of AUD units constructed
- Types of units constructed, especially priority housing units
- Location of constructed units
- Location of Employment (Downtown, South Coast Region, Other)
- Price point of rental and affordable ownership units. Are these units priced lower than those developed at base or Medium-High densities?
- Turnover of units/Vacancy rate

## **V. OTHER ZONING ORDINANCE AMENDMENTS**

As part of the AUD Program Ordinance Amendment package, Staff is proposing to amend applicable zoning districts to ensure consistency with the AUD Program ordinance. In

addition, minor changes to the municipal code are proposed in order to provide additional clarification and/or promote uniformity within the code. These amendments include:

**Building Heights:** Zoning Ordinance sections §28.66.050, §28.69.050, §28.72.050, and §28.73.050 are proposed to be amended to restrict building height to 45 feet unless the building is a Community Benefit project.

**Open Yard Encroachment:** Amend section §28.87.062.C in the General Provisions section of the Zoning Ordinance to clarify open yard encroachment requirements in the Single-Family, Two-Family (R-2), and Multi-Family (R-3/R-4) residential zones.

**Uncovered Balconies:** Amend §28.21.081.A.g to remove item number 1 stating, "*Uncovered balconies may encroach up to two (2) feet into any setback*". This provision is not appropriate for this section of the code and has made its application problematic. A similar provision is currently found in the General Provisions section of the Zoning Ordinance where its application is more appropriate.

**Open Space:** Amend sections §28.21.081.A.2.b (10) and §28.21.081.B.5.c. to include language consistent with §28.21.081.A.1.f. as follows, "...or other cantilevered architectural or building projections not providing additional floor area...".

**Common Open Area:** Amend §28.21.081.A.3 to clarify that the common open area requirement applies to lots developed with four or more dwelling units. Also, amend §28.21.081.A.3 and §28.21.081.B.4 to clarify that front setback (not the front yard) shall be excluded from the common open area.

## VI. ENVIRONMENTAL REVIEW

The Final Program Environmental Impact Report (FEIR) for the *Plan Santa Barbara* General Plan Update was certified by the Planning Commission September 2010 and by the City Council December 2011. The FEIR evaluated citywide effects on the environment from growth to the year 2030 under the proposed General Plan policies (up to 1.35 million feet of net additional non-residential and up to 2,800 additional housing units).

California Environmental Quality Act (CEQA) Statutes Section 21083.3 and CEQA Guidelines Section 15183 provide that projects which are consistent with the development density established by General Plan policies for which an EIR was certified, and rezoning consistent with the plan, shall not require additional environmental review except under specified instances.

The Average Unit-Size Density Incentive Program is within the scope of review for the General Plan Update and FEIR. The City Environmental Analyst has determined that the proposed implementing ordinance amendments for the Average Unit-Size Density Incentive Program policies do not trigger the additional environmental review requirements, for the following reasons: There are no additional site-specific or project-specific significant effects which are peculiar to the proposed zoning amendments; there is no new significant effects not addressed in the prior FEIR; and there is no new information since the FEIR that would involve more significant impacts than identified in the FEIR. Therefore, no further environmental review is required.

**NEXT STEPS**

- a. Planning Commission Review/Recommendation (April 11, 2013)
- b. Council Ordinance Committee Review (May/June 2013)
- c. Council Introduction and Adoption (June/July 2013)

Exhibits:

- A. Average Unit-Size Density Incentive Program Map
- B. Employer Sponsored Housing Forum Discussion Summary and Forum Flyer
- ~~C. Draft AUD Program Ordinance~~—Refer to Ordinance included in CAR, 5/14/13
- D. AUD Program Density Table



**Legend**

**Medium High Density Residential (15-27 du/acre)**

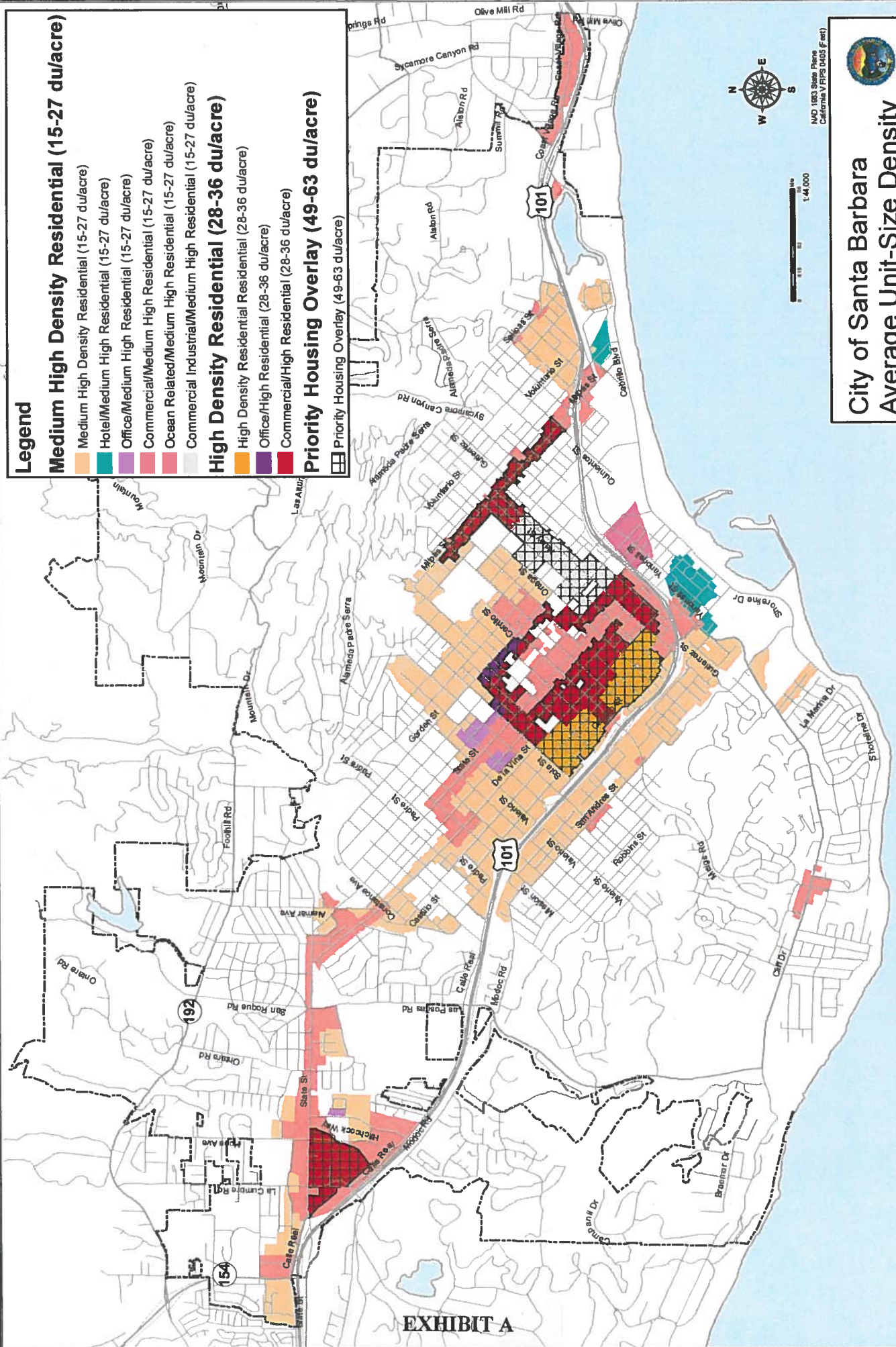
- Medium High Density Residential (15-27 du/acre)
- Hotel/Medium High Residential (15-27 du/acre)
- Office/Medium High Residential (15-27 du/acre)
- Commercial/Medium High Residential (15-27 du/acre)
- Ocean Related/Medium High Residential (15-27 du/acre)
- Commercial Industrial/Medium High Residential (15-27 du/acre)

**High Density Residential (28-36 du/acre)**

- High Density Residential (28-36 du/acre)
- Office/High Residential (28-36 du/acre)
- Commercial/High Residential (28-36 du/acre)

**Priority Housing Overlay (49-63 du/acre)**

- Priority Housing Overlay (49-63 du/acre)



NAD 1983 State Plane  
California V FIPS 0405 Feet



**City of Santa Barbara  
Average Unit-Size Density  
Incentive Program Map**

Map prepared by City of Santa Barbara, Planning Division, Nov 2011

**EXHIBIT A**



## **EMPLOYER SPONSORED HOUSING FORUM**

### **DISCUSSION SUMMARY**

An Employer Sponsored Housing Forum was held on September 12, 2012 and included a panel discussion with community members experienced and actively producing workforce housing. The discussion focused on identifying what is needed to achieve a viable and successful program, as well as challenges that a participating employer might face.

#### *Program Benefits*

The panel was asked to identify what aspects of an Employer Sponsored Housing Program would persuade or motivate local businesses to participate. Recruitment and retention, economic investment, and program simplicity were identified as key reasons to take part in the program. It was also acknowledged that implementing an Employer Sponsored Housing Program would offer simultaneous benefits for employers, employees and the community.

The shortage of affordable housing continues to make it difficult for local businesses to recruit and retain quality employees. High employee turnover and the inability to recruit the most qualified person due to high housing prices can in the long-term be costly to an employer. It is estimated that it costs approximately \$70,000 to train a new employee; therefore an employer should view the program as an economic investment, because creating housing for their workforce will ultimately result in a cost benefit to their business.

Benefits to employees include the ability to purchase affordable housing where they live, reduce commute time and cost, and increase time spent in the community and with their family resulting in greater productivity and loyalty.

#### *Program Challenges*

Land and development cost, financing capital, and lack of experience and expertise were identified as potential barriers that might prevent an employer from participating in this program. Employers, especially smaller businesses are not accustomed to the role of developer and/or lender. For some employers taking on this role may be too complex and prolonged. Thus, the lack of expertise in real estate development and inexperience in the City's permitting process could discourage participation in the program.

Land cost also poses a major factor and barrier to the development of workforce housing. Only a few local employers (e.g., UCSB Westmont College, Cottage Hospital) have been successful in producing employee housing, and all have owned the land. These employers tend to be larger, own the land, and have the financial capital needed to develop employee housing. Additionally, lack of expertise in real estate development and inexperience in permit processing can discourage an employer from providing housing for their workforce.

#### *Recommendations*

Local employers such as Cottage Hospital, Westmont, and UCSB have successfully produced employee housing. However, as pointed out at the community forum, these are large employers with land, financial capital, and the expertise needed to produce housing for their workforce. Consequently, without such resources smaller employers would find it difficult to participate in the program. With this in mind, ideas were offered by the panel to help minimize the obstacles

that might dissuade an employer from participating in the program. The following ideas were recommended:

**Program Model:** Provide a model or clearinghouse approach to help employers navigate through the development process. This would save time and effort and reduce costs. The model could offer:

- Sample covenants, development agreements
- Cost/benefit analysis of recruitment and retention
- Amount of upfront capital needed
- Sample project prototypes, such as those developed by the Design Charrette conducted by the AIA during the General Plan Update process

**Land Inventory:** Conduct an inventory of available public land suitable for workforce housing.

**Private Landowners:** Identify private landowners with excess land (e.g., churches) who would donate their land. These entities are often interested in producing affordable housing, but do not have the expertise or experience.

**Small Property Owners:** Allow small property owners to participate in the program as partners.

**AUD Program:** Implement the AUD Program to allow increased densities and flexibility in development standards, such as parking, which would help reduce development costs.

**City Review:** Expedite review of employer sponsored housing projects to help reduce development cost.

**Partnerships:** Enlist large employers and/or developers (consortium approach) to serve as partners making it easier for smaller employers to participate in the Program.

**Environmental Review:** Use the General Plan Update Environmental Impact Report (EIR) to shorten and simplify the review process for employer sponsored housing projects.



# COMMUNITY FORUM ON EMPLOYER SPONSORED HOUSING

**How can the City help Employers (big and small)  
develop housing for their workers?**

The City's new Employer Sponsored Housing Program offers higher densities and more flexible development standards as incentives for employers, either individually or as a consortium to help build below market rate housing to their employees.

Please join us and learn more about how this program can work for your business!

## **FORUM PANEL INCLUDES:**

- **Steve Amerikaner**, Brownstein Hyatt Farber Schreck (Moderator)
- **Ron Biscaro**, Cottage Health Systems
- **Detlev Peikert**, Peikert Group Architects
- **Rochelle Rose**, Peoples' Self-Help Housing
- **David Rowell**, City of Santa Barbara
- **Ed Soto**, Bank of America
- **Craig Zimmerman**, The Towbes Group, Inc.

**DATE: Wednesday, September 12**

**TIME: 7:30 – 9:30 a.m.**

**LOCATION: 630 Garden Street (David Gebhard Public Meeting Room)**

**Everyone welcome! A light breakfast will be provided.**

Please RSVP your attendance to Irma Unzueta, Project Planner at  
[iunzueta@SantaBarbaraCA.gov](mailto:iunzueta@SantaBarbaraCA.gov).



## Forum Panel Bios

**Steven A. Amerikaner**, partner with Brownstein Hyatt Farber Schreck, LLP, counsels developers, public agencies, businesses and homeowners on land development issues such as securing land use permits (including coastal permits and major general plan and zoning amendments). He is also General Counsel to a regional water agency and a local sanitary district and served as Santa Barbara City Attorney from 1982-1990. He is active in a number of community organizations, including the Board of Directors of the Santa Barbara Region Chamber of Commerce and the Coastal Housing Coalition.

**Brownstein | Hyatt  
Farber | Schreck**

**Ron Biscaro**, Vice President for Housing and Real Estate Development at Cottage Health Systems since 2003. He has overseen the development of Bella Riviera, a workforce housing project for Cottage Hospital employees. Mr. Biscaro has collaborated with architects, planners, City officials, and a Housing Task Force of the Cottage Board in developing the housing project. From 1986 and 2003, Mr. Biscaro served as Administrator at the St. Francis Medical. He received a Bachelor of Science degree in Biology from McGill University and a Master's in Health Administration from the University of Ottawa. He is a diplomat of the American College of Health Care Executives.



**Detlev Peikert**, AIA is principal and founder of Peikert Group Architects, LLP. He has worked in the field of architecture for more than 30 years, and has extensive experience with a wide variety of building types. He is knowledgeable in all aspects of architectural practice including design, project management and real estate development. In 1994, he founded the Sustainability Project, a nonprofit organization dedicated to implementing the principles of sustainability as applied to the built environment, and is actively engaged with a number of community organizations including the board of the Coastal Housing Coalition, an organization dedicated to advocating for workforce housing.



**Rochelle Rose**, CFRE is Development Director for Peoples' Self-Help Housing, a nonprofit community development organization that develops affordable housing for low income families, seniors, and other special needs groups in the tri-counties. Peoples' has developed and manages 1,350 affordable apartments and has helped over 1,100 low income households build and own their first home through their 'sweat equity' model. A UCSB graduate, she has led successful fundraising efforts at many nonprofits and has served on the boards of Girls inc., Association of Fundraising Executives and others. In 2007 she was awarded the AFP Professional Fundraiser of the Year for Santa Barbara and Ventura Counties. She currently serves on the boards of the Center for Successful Aging and the Coastal Housing Coalition.



**David Rowell** is a Housing Programs Specialist at the City of Santa Barbara. Previously he was President of Sage Point Real Estate Valuations and managed the design, customer contact, business transactions and quality control of their national service. Mr. Rowell was employed for over 18 years in the real estate finance industry at Fannie Mae. He has served as Director of the Western Regional Office and managed account teams in transacting billions of dollars of mortgage business. Prior to that, he was Senior Negotiator, Account Executive, Senior Underwriter and REO Manager. Mr. Rowell holds a BS from UCSB, an MS from the University of Oregon, and a Professional Designation in Real Estate from UCLA.



**Ed Soto** is a Sr. Mortgage Loan Officer with Bank of America. He has been in the mortgage lending industry for 22 years. He is a graduate of Westmont College and majored in Economics/Business. He has achieved one of the highest recognitions for his position with Bank of America as a Sr. Mortgage Loan Officer, earning the prestigious "Platinum Club" award several times. Ed is active with the Old Spanish Days Fiesta Parade and other events sponsored by Bank of America that give back to our community.



**Craig Zimmerman** is the President of The Towbes Group, Inc., a full service real estate company based in Santa Barbara that develops and manages both residential and commercial real estate. The Towbes Group manages more than 2,100 apartment units in Santa Barbara and Ventura County including several affordable, senior, Section 8 and workforce housing communities. He also serves as a Director on the Board of Montecito Bank & Trust. Mr. Zimmerman is active in the non-profit community serving on the boards of The Scholarship Foundation of Santa Barbara, Surf Development (County Housing Authority), Santa Barbara Middle School, UCSB Economic Forecast Project and The Towbes Foundation.



Exhibit C: Prior Draft of AUD Program Ordinance from Planning Commission Staff Report dated with Agenda date, April 11, 2013, is omitted.

**AVERAGE UNIT-SIZE DENSITY (AUD) INCENTIVE PROGRAM TABLE**

Medium-High Density (15-27 du/ac)		High Density (28-36 du/ac)		Priority Housing Overlay (37-63 du/ac)	
Maximum Average Unit Size SF	Density du/ac	Maximum Average Unit Size SF	Density du/ac	Maximum Average Unit Size SF	Density du/ac
1,450	15	1,245	28	970	37
1,360	16	1,200	29	970	38
1,280	17	1,160	30	970	39
1,210	18	1,125	31	970	40
1,145	19	1,090	32	970	41
1,090	20	1,055	33	970	42
1,040	21	1,025	34	970	43
990	22	955	35	970	44
950	23	970	36	970	45
910	24			970	46
870	25			970	47
840	26			970	48
805	27			969	49
				960	50
				941	51
				935	52
				917	53
				901	54
				896	55
				880	56
				874	57
				859	58
				845	59
				840	60
				827	61
				825	62
				811	63