



April 21, 2026

Supervisor Bob Nelson, Chair
Supervisor Joan Hartmann, Vice-Chair
Supervisor Roy Lee
Supervisor Laura Capps
Supervisor Steve Lavagnino
105 East Anapamu Street
Santa Barbara, CA 93101

RE: Item D2) Inclusionary Housing Ordinance Amendment

Dear Chair Nelson and Supervisors,

The Santa Barbara Association of REALTORS® (SBAOR) represents more than 1,200 REALTORS® across the South Coast who live and work in the communities they serve. Our members help families and businesses navigate housing and real estate decisions, and we work closely with local governments and community partners to advance practical, community-focused housing solutions. We share the City's goal of ensuring Santa Barbara remains a place where people can live, work, and thrive.

On behalf of the Santa Barbara Association of REALTORS® (SBAOR), we appreciate the opportunity to provide comments on the proposed updates to the County's Inclusionary Housing Ordinance. SBAOR supports these changes. The updates reflect a thoughtful and measured approach to maintaining compliance with State law while preserving flexibility needed to support housing production. In particular, allowing market-rate multifamily projects to satisfy inclusionary requirements through off-site construction within close geographic proximity provides a practical tool to improve project feasibility and encourage continued development of both market-rate and affordable housing.

We also acknowledge the County's efforts to refine local preference criteria within the South Coast Housing Market Area. Prioritizing individuals who live and work locally can support workforce housing needs and community stability. As these provisions are implemented, we encourage the County to ensure that any preference program is carefully structured to remain consistent with fair housing laws and applicable federal guidance, including maintaining the program as a preference rather than a requirement and periodically evaluating outcomes to avoid unintended disparate impacts.

Additionally, we appreciate the ordinance's requirement that deed-restricted units be comparable in exterior appearance, amenities, and overall construction quality to market-rate units within the same project. This standard reinforces the County's commitment to high-quality housing outcomes across all income levels. As these updates are implemented, SBAOR offers one consideration for the County's continued evaluation. For projects utilizing off-site compliance, it may be helpful to consider how affordable units are located in relation to access to public amenities, transportation, employment centers, and community resources, to the extent feasible. This approach would complement the existing quality standards and further support equitable access to opportunity.



Overall, SBAOR believes these updates strike an appropriate balance between advancing housing goals and maintaining the flexibility necessary for projects to move forward. We appreciate the County's continued efforts to address housing needs and look forward to working collaboratively as these policies are implemented.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Berger". The signature is written in a cursive, flowing style.

Jennifer Berger, 2026 President