

**Revised Adopted Housing Element 2023-2031 revisions posted October 2, 2023**

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October 9, 2023**

City Council, Planning Commission, and city staff  
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Dear City Council, Planning Commissioners and staff,

I greatly appreciate the many hours spent during the three workshops in July discussing the various zoning possibilities for the Kenwood Village project. In the end, I understand that the intention is to rezone the property for RH with a maximum of 190 units.

Council and Planning Commission were struggling with creating split zoning (RS vs. RM vs. RH) using the current split between the upper and lower portions of the property. I can't tell you how grateful I am that this was NOT done. Commissioner Chapman stated (at the July 20 workshop) that he supports using the design review process to address the architecture concerns rather than split zoning, Mr. Imhof stated (at the July 20 workshop) that Staff does not recommend split zoning and a Commissioner (at the July 31 workshop) stated that the property owner needs flexibility; all were on-point. The flexibility that will be necessary to create a project with higher density toward Calle Real and lower density toward the existing single family residences to the north and east cannot be achieved using the arbitrary split that now exists between the upper and lower portions of the property. Rezoning the entire property under a single zone will allow an architect to produce a much better project that is more cohesive to the neighborhood to make the project flow better against the existing densities to the north and east which do not match up in any way with the current zoning split.

I hope everyone is aware of the Friendship Manor (FM) project in Isla Vista. FM has been in operation as a senior congregate living facility since 1973. They operate from a dorm that was built in 1967 designed for young and able-bodied college students. You must be at least 62 years old to reside at FM. Due to seniors living longer and more frail lives, FM has a need to build a new purposely-built building with enhanced features to cater to senior needs. For instance, they need ADA bathrooms and ADA living spaces which both require slightly more space than they have in the existing dorms. They want to employ the latest green technology to save on operational costs and keep rents affordable. FM also hope to add space to accommodate areas for an adult senior day care and/or outside caregivers.

I go to church with residents of Friendship Manor and I have visited FM on multiple occasions. I am in touch with their manager and two of their board members. They have approached me multiple times over the years hoping that I could help them create the new Friendship Manor at Kenwood Village. In the past I had to say "no" because I had already created the 60-unit single family housing project with

which everyone is very familiar. After I was told in July that the City was considering rezoning the property for RH at approximately 284 units, I reengaged with FM to discuss how I could help them move their residents to a new project on the Kenwood site.

Friendship Manor's current project is 214 units on just under 2.5 acres. They feel that a refreshed version of their site would require 3-4 acres in order to expand the units to add the ADA features that they need for their residents. Such that no resident is left behind, the new project must accommodate at least 214 units. My thought was to put a new Friendship Manor along Calle Real and then surround it to the north and to the east with lower density homes that would accomplish my original goal of creating housing for my employees. Additionally, it would create housing for Friendship Manor staff. In this way, the highest density is along Calle Real and the lower density portion flows toward the existing single family houses to the north and east.

Because Friendship Manor is a senior project, the mobility of the residents is much lower than those who would reside upon the remainder of the Kenwood site. While 190 units can certainly be accomplished, FM consists of much smaller clustered units that needs much less land and can fit well onto the Kenwood Village site leaving space for much needed worker housing. While the FM concept with surrounding housing is a higher density project, this concept of a 284 unit project including 214 units for FM I believe will have a LOWER impact and fit better with the surrounding neighborhood than would a 190 unit project without Friendship Manor being involved. Creating an arbitrary cap of 190 units on a site that could accommodate 284 ends up with a larger impact than one that could be achieved with Friendship Manor.

I don't think a cap is a good thing, as proven here. Kenwood Village is the only property with a proposed maximum number of units that is less than the zoning will allow. The design element needs to be left up to the architect to produce what is good for the project and what is good for the neighbors. The currently proposed 60-unit project for Kenwood Village was designed with the surrounding neighborhood under consideration in that I put all of the higher density housing along Calle Real and created lower density housing to the north and east. I was respectful of the community (with none of their input) and I feel I can do this again under a design that allows for the 284 units. After a lot of consideration, I think a 190 unit project has its merits, and I will produce it if that is the only option, but I feel that the 284 unit option is better and carries less impact.

I was hoping to introduce this concept to everyone at the final July 31 meeting as multiple times Council and Planning Commissioners suggested that they "ask the property owner" how the different zoning options would affect the project, but, alas, I was never invited to speak even after it was suggested. What a great thing it will be for our community to get our seniors a new ADA compliant and energy efficient space that is out of Isla Vista and in Goleta. Plus, I can still build the homes I've been wanting to build for our local workers!

Please recall that at the first (July 20) meeting, a straw vote resulted in unanimous support from Council and the Commission for the staff recommendation to rezone Kenwood to RH with a maximum of approximately 284 units without split zoning and without a cap, all after nearly an hour of discussion. Council and Planning Commission - I respectfully request that you think over my idea and let staff know if you agree with removing the cap (as was voted for originally). Staff - I respectfully request that you seek opinions from Council and Planning Commission again. I am just as committed now to producing a

project that is good for the community and for the neighbors, but I need the leeway to produce something good without artificial limitations. Every time the project gets limited, the ability to be creative and flexible gets diminished.

Will HCD support a cap at the very lowest end of the RH spectrum being placed on a single parcel amongst all the rezoned parcels? Will this seem disingenuous? My understanding is that HCD treats an identical minimum and maximum threshold on a property as being a constraint because, "it provides a narrow/precise range that does not allow flexibility for proposals."

If a cap must exist, I suggest going back and reviewing the video from the third (July 31) meeting. After input from several neighbors and concerns of both density and additional traffic, Commissioner Kasdin introduced the concept of a 22-24 units/acre cap which, over the 90+ minutes of deliberation, ended with an arbitrary 190 unit cap on the project. If you consider that RH zoning dictates a minimum of 20 units per acre, and the site is about 9.86 acres, that dictates a minimum of 197 units, yet the straw vote came in at a maximum of 190. The maximum that can be built is LOWER than the minimum that can be built. This makes no sense. Does that mean the project can't be built? Even if you bump the cap to 197 this then means the project has to be 197 units, no less, no more; shoehorned with no flexibility. I spoke to a few builders about this and it makes the project difficult. Having no range where the lower and upper limits are identical is impractical which is why zoning has a broad range of units; a lower and upper end. By capping Kenwood there is no longer ANY wiggle room. This forces us to create a project with 197 units no matter what; there is no creativity left in the architectural and planning process and nowhere to go if we need a few more units for the project to pencil, or a few less for it to make more sense for the neighbors or the bank funding the project.


Additionally, I assume the acreage is being taken from an assessor's map, which the assessor tells us is not deemed to be accurate. If you have a cap that is so close to the minimum number of units and the acreage ends up larger, we are right back to a maximum that is less than the minimum. Instead of having a limit of 190 units (or 197 units), any cap that is applied needs to be based upon UNITS/ACRE as Councilmember Kasdin originally suggested. I would suggest using what he articulated at 22-24/acre, but at the very least, please change to units/acre and not a hard cap (assuming you can't just get rid of the cap altogether, as I've asked for above).

Also, please take note that on page 10-11 parcel 077-130-006 is shown as 9.85 acres rather than the 9.86 shown in table 10A-28 and on the assessor's map. This is probably a typo.

Finally, I'd like to point out that the latest Housing Element revision only calls out the 077-130-006 parcel for rezoning, but the project site also includes parcels 077-130-19 and 077-141-49 which accounts for another 0.61 acres. Please include these in the rezone so that the entire project has the same zoning.

I am available to discuss further at your convenience. Thank you for your time and consideration.

Sincerely,



Ken Alker