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September 17, 2019

Peter T. Imhof, Planning Director
 City of Goleta Planning Commission
 130 Cremona Drive, Ste. D
 Goleta, CA 93117

Re: Senior Care Facilities

Dear Mr. Imhof:

At the meeting of the Planning Commission on September 9, 2019, I understood you to be directed to come back to the Commission with a plan to change the pending zoning ordinance to enable residential care facilities in the residential zones along with a specific proposal to make any necessary changes in the General Plan to correspond with the proposed zoning ordinance. Specifically at least two of the commissioners requested that such changes in both documents enable realistic and feasible standards to facilitate senior care facilities without a burdensome permit requirement.

The problem seemed to focus on the distinction between small and large residential care facilities as presently described in the draft zoning ordinance. Most simply it appeared that the easiest way to accomplish this purpose was to define small residential care facilities to be not limited to six (6) persons but rather be defined in such a way as to allow up to fourteen (14) residents in a single family home as was permitted until a change in the zoning ordinance some time ago.

We propose that a small residential care facility be defined as one allowing a senior resident for every 300 square feet in the residence up to a maximum of fourteen (14). That readily be done within the draft zoning ordinance, but the amendment to the General Plan required to make it consistent with the proposed zoning ordinance is also necessary.

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To that end, I have briefly looked through the voluminous General Plan and the Housing Element and am writing to suggest what appears to be necessary with respect to a proposal to amend the General Plan to conform to the desired change in the draft zoning ordinance.

It is clear that the Housing Element of your General Plan has as its overriding purpose provision of adequate housing for all elements of the population of the City of Goleta. It is also clear that all of those elements should have an equal opportunity for housing. It is also clear that putting a limit on the number of persons who can occupy a single family home in the residential zones with respect to seniors does not provide an equal opportunity for housing for seniors commensurate with the opportunities for students and unlimited family members to live in a single family home. It is especially unfair and unequal to put a limit of six (6) seniors to occupy a single family home when all other categories of potential occupants are unlimited.

In examining the Housing Element, it appears that Section HE 3.2d must be revised to enable more than six (6) persons to reside in a single family residential family home consistent with the proposal made above to tie the number of such persons to a square footage limitation rather than an arbitrary number which bears no relation to the size of the residence.

I trust your proposal to the Commission in response to the request made of you will deal with both the change in the pending zoning ordinance and a proposed amendment to the General Plan to facilitate residential care facilities so that seniors may live in residential neighborhoods under opportunities equal to or commensurate with that available to other age groups of individuals.

Very truly yours,

ALLEN & KIMBELL, LLP

By 

Charles D. Kimbell

CDK/dob

Enclosure

cc: City of Goleta Planning Commissioners
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