



December 14, 2020

Mr. Scott Donnell
Senior Planner, Community Development
City of Carlsbad
1635 Faraday Avenue
Carlsbad, CA 92008
Submitted via email: planning@carlsbadca.gov

Re: Draft 6th Cycle Housing Element

Dear Mr. Donnell:

On behalf of the San Diego Housing Federation, we are writing to provide comments and feedback on the draft 6th Cycle Housing Element for the City of Carlsbad.

The draft Housing Element contains several actionable items that will help Carlsbad make progress toward meeting its housing goals. We applaud these components of the draft Housing Element and would like to make some additional recommendations to strengthen the plan's impact on achieving housing goals.

Implementing State Legislation

The San Diego Housing Federation is a proud co-sponsor of AB 1486, a bill that strengthened and clarified the state's Surplus Land Act. We strongly support the proposal to include surplus land from the city or other public entity into the city's land banking program as described in Program 2.5 (p. 10-197). Identifying unused City-owned sites for housing can help to ensure the City is compliant with the State Surplus Land Act and helps support the development of affordable housing.

We are pleased to see Housing Program 2.3 regarding Density Bonus (p. 10-194) recognizing recent changes to state density bonus law included in this plan. We recommend that the City move quickly to implement AB 1763, a bill we supported which provides a density bonus for developments that are 100 percent affordable, to serve as a tool for building affordable housing. The City should also work to implement AB 2345, a bill we supported that built on the success of the City of San Diego's Affordable Homes Bonus Program (AHBP) by taking the program statewide. A report by Circulate San Diego, "[Equity and Climate for Homes](#)," found that 63 percent of AHBP projects were located in high and highest resource census tracts, demonstrating the program's role in affirmatively furthering fair housing. Just passed and signed into law this year, AB 2345 is a valuable tool to achieve the City's housing goals.

Local funding for affordable housing

The draft Housing Element recognizes the need for funding to build housing that is affordable to low-income individuals and families. As is recognized throughout the draft Housing Element, federal and state funding is a critical piece to the resources puzzle. We are pleased to see the Housing Element specifically include the Permanent Local Housing Allocation (PLHA), also known as the Building Homes and Jobs Act ([SB 2, 2017](#)). We recommend that the city include a goal to prioritize these funds for the development of deed-restricted affordable housing. Maximizing the use of these funds to build housing for extremely low-, very low-, and moderate income households will help the City meet its RHNA obligations. Additionally, as local gap financing is critical, we encourage the City to consider dedicating former redevelopment funds, sometimes called “boomerang funds,” as a local source of funding for affordable housing.

Affirmatively furthering fair housing and equity

As noted in the housing element, nearly all census tracts in the City are identified as ‘high opportunity’ according to the UC Davis Center for Regional Change (p. 10-62) and the city is predominantly White with the White population comprising over three-quarters of the City’s population (p. 10-58). It also notes that the Village-Barrio area (Census Tract 179) consistently shows more segregation than the rest of the city (p. 10-65). As we know, housing development policies – how much and where new housing can be built – play a role in patterns of segregation within a community.

While the housing production goals and policies outlined in section 10.7 of the plan (Policies 10-P.1-13) are laudable, the constraints created by the City’s Growth Management Plan can hinder the ambitious goals of those policies and can play a role in creating exclusion. We recommend that the city fully examine the Growth Management Plan for its compliance with SB 330 as acknowledged on page 10-119. If the Growth Management Plan fails to comply, the City should take action to eliminate or modify the policy to ensure that it meets the state’s standards and intent of SB 330.

We further recommend that the City review the California Department of Housing and Community Development (HCD) 2020 Analysis of Impediments to Fair Housing Choice and include the recommendations and actions outlined in the report. We additionally recommend that the City work with HCD on AFFH recommendations as they relate specifically to Housing Elements and incorporate those recommendations in the plan.

Housing and Climate Change

Our September 2016 report, “[Location Matters: Affordable Housing and VMT Reduction in San Diego County](#),” found that lower-income households are more likely to live in transit-rich areas, own fewer cars, are likely to live in larger building and smaller units, all factors that make affordable housing near transit a key greenhouse gas reduction strategy. We are very pleased to see the plan recognize the Affordable Housing and Sustainable Communities (AHSC) program as a resource to support infill development that reduces greenhouse gas (GHG) emissions and

Program 3.1 calls for the City to actively pursue funds from programs like AHSC (p. 10-211). To achieve that goal, the City must ensure that sites near transit are appropriately zoned to be competitive for the types of projects that pursue that funding as well as for project feasibility.

In addition, the City's Climate Action Plan includes a Transportation Demand Management strategy that describes the greenhouse gas reduction measure as reducing vehicle miles traveled (VMT) by shifting single occupancy vehicle use to alternative modes and reducing the average commute length (Carlsbad Climate Action Plan, p. 4-11). However, the few mentions of the Climate Action Plan in the Housing Element are in relation to energy conservation measures and makes no mention of dense, deed-restricted affordable housing as a greenhouse gas reduction tool by increasing transit ridership. We urge the City to examine the role of affordable housing in helping the City to meet both its RHNA obligations and its Climate Action Plan goals.

We thank you for consideration of our feedback and comments. We appreciate the time and effort that Planning Department staff have dedicated to the draft Housing Element document and look forward to supporting the City of Carlsbad in adopting a robust plan that will help to meet the City's housing goals.

Sincerely,



Laura Nunn
Chief of Policy & Education