



August 19, 2020

Ms. Jennifer Gates, AICP
Principal Planner
City of Encinitas
505 S. Vulcan Avenue
Encinitas, CA 92024
Submitted via email: jgates@encinitasca.gov

Re: Draft 6th Cycle Housing Element

Dear Ms. Gates:

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 Encinitas.

The draft Housing Element contains several actionable items that will help Encinitas 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. City implementation of this bill will advance Housing Element Policy 1.4 (HE 1-6) to provide opportunities for low and moderate income housing throughout the city. We applaud the city's goal in Program 2B to prepare an inventory of City surplus land no longer required for the City's use by December of each year. This will ensure the City is compliant with the State Surplus Land Act and help support the development of affordable housing.

We were also proud to support AB 1763, which provides a density bonus for developments that are 100 percent affordable. We recommend that the City move quickly to implement this legislation to serve as a tool for building affordable housing. The City should also closely monitor AB 2345, a bill we are supporting that would build 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. Should AB 2345 pass and be signed by the Governor this fall, this could serve as 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 recommend that the Housing Element specifically include a goal to prioritize funds made available through the Permanent Local Housing Allocation (PLHA), also known as the Building Homes and Jobs Act ([SB 2, 2017](#)), 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.

We would like to express our strong support for Program 2B (HE 1-19-20), which calls for partnering with agencies like North County Transit. Such partnerships can help with the creation of affordable housing near transit and facilitate competitive applications for the state’s Affordable Housing and Sustainable Communities (AHSC) grant program. We also applaud the City’s effort to subsidize off-site public improvement costs by waiving, deferring, or reducing development fees (HE 1-20). For affordable housing developments, such subsidies can increase the number of units that can be produced by lowering funds that must be spent on public improvements.

Affordable housing preservation

The draft Housing Element states a goal to ensure the continued affordability of deed-restricted affordable units (Goal 4, HE 1-8). We recommend that the City dedicate staff time or hire a coordinator or consultant to perform a thorough analysis of the City’s affordable housing stock. Such an analysis should examine both deed-restricted and naturally-occurring affordable housing in order to understand the stock of availability and affordability of the existing housing stock in the City. With a clear picture from such an analysis, the City can identify actions and resources that will be needed to preserve affordable housing in Encinitas.

Affirmatively furthering fair housing and equity

As noted in the housing element, all census tracts in the City are shown on the 2019 Tax Credit Allocation Committee’s Opportunity Map as areas of highest or high resource and the city is predominantly white with the white population comprising 88.7 percent of the City’s population (HE 1-13). It is also noted that patterns of racial and ethnic concentration exist in the region (HE 1-35). The City of Encinitas should take the opportunity in its Housing Element to recognize the role that the City has played in segregation on a regional level. In particular, the Right to Vote Amendment has contributed to exclusionary zoning and is among the most onerous policies contributing to inadequate housing supply in the state.

We 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

The City's Climate Action Plan calls on the City's Housing Element to implement and enforce existing specific plans to reduce Vehicle Miles Traveled and encourage dense, infill development (Table 3-6 Strategy 4: Clean and Efficient Transportation). However, the Housing Element only makes mention of these plans as they relate to parking standards and ground-floor commercial. We recommend that the City act on the strategy in the Climate Action Plan to facilitate dense, infill housing near transit. 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 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 Encinitas in adopting a robust plan that will help to meet the City's housing goals.

Sincerely,



Laura Nunn
Director of Policy & Programs