



3939 Iowa Street, Ste. 1
San Diego, CA 92104
Phone: (619) 239-6693
Fax: (619) 239-5523
www.housingsandiego.org

July 22, 2021

Ms. Melissa Devine
Planning Manager
City of El Cajon
200 Civic Center Way, 3rd Floor
El Cajon, CA 92020
Submitted via email: mdevine@cityofelcajon.us

Re: Draft 6th Cycle Housing Element

Dear Ms. Devine:

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 El Cajon.

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

Implementing State Legislation

The San Diego Housing Federation was 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 help the city make progress toward the need for 895 extremely-low, low and very-low income units for the Regional Housing Needs Allocation for the 2021-2029 cycle (p. 72). 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 encourage adding an objective to Program 5 regarding affordable housing development (page 90) to update city policies to comply with the Surplus Land Act. This addition will support progress toward Policy 1-1: facilitate the production of housing for all segments of the population including those with special needs (page 87).

We are pleased to see Program 14 to amend the City's Zoning Code 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 builds 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.

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 and that 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. As local gap financing is critical, we also recommend that the City include recycled RDA funds as a local financing source.

Affordable housing preservation

The draft Housing Element identifies seven affordable housing projects consisting of 481 assisted units at-risk of converting to market-rate housing (p. 37). Program 11 calls for the preservation of assisted housing at risk of converting to market rate and lists several objectives (page 95). We recommend that the City dedicate staff time or hire a coordinator or consultant to perform these duties. Given the importance of the City's affordable housing stock to serving low-income residents, the City should be as proactive as possible in preserving its affordable housing stock. We also recommend that the City include new funds made available in the State's FY21-22 budget for preservation of deed-restricted affordable housing as a resource for these activities.

Affirmatively furthering fair housing and equity

In the document's race and ethnicity overview, it is unclear why there is mention of decades old studies suggesting "that different racial and ethnic groups differ in their attitudes toward and/or tolerance for 'housing problems'...including overcrowding and housing cost burden" (page 7). However, it is important to note the distinction between living in quality, safe, high-density housing and living in overcrowded conditions. It is also important to note the role that housing density plays in reducing housing cost burdens and advancing affirmatively furthering fair housing.

As noted in the housing element, there are two Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) in the City (page D-2). 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. We recommend that the City work with HCD on AFFH recommendations as they relate specifically to Housing Elements and incorporate those recommendations in the plan. In addition to advancing Policy 1-2 to encourage that housing constructed expressly for lower income households not be concentrated in any single portion of the City (page 87), implementing AFFH in accordance with HCD recommendations will also help to encourage development of housing for lower-income households in high-opportunity communities.

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 pleased to see Policy 1-5 to coordinate and collaborate with the San Diego Metro Transit System to facilitate development in the Transit District Specific Plan area (page 87). We recommend that the City include Affordable Housing and Sustainable Communities (AHSC) program funds as a funding resource and work with affordable housing developers to pursue funds from the program.

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

Sincerely,



Laura Nunn
Chief of Policy & Education