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July 27, 2021

Mr. Noah Alvey, AICP
Community Development Manager
City of Lemon Grove
3232 Main Street
Lemon Grove, CA 91945
Submitted via email: nalvey@lemongrove.ca.gov

Re: Draft 6th Cycle Housing Element

Dear Mr. Alvey:

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 Lemon Grove.

The draft Housing Element contains several actionable items that will help Lemon Grove 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 can help the city make progress toward the need for 461 extremely-low, low and very-low income units for the Regional Housing Needs Allocation for the 2021-2029 cycle (p. 63). 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 a policy to Objective 7 regarding affordable housing development (page 79) to update city policies to comply with the Surplus Land Act.

We are pleased to see Program 5 to update and utilize density bonus provisions. Implementation of AB 1763, a bill we supported which provides a density bonus for developments that are 100 percent affordable, serves 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.

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 5). 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 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.

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 Program 3 to facilitate development of higher density housing with a specific focus near transit (page 81). However, the program does not mention the need for deed-restricted affordable housing near transit. We recommend that the City build upon its record of success in developing affordable housing near transit by encouraging mixed income and 100 percent affordable developments in these locations. Building affordable housing near transit can help the City meet both its RHNA obligations as well as goals to reduce greenhouse gas emissions.

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 Lemon Grove in adopting a robust plan that will help to meet the City's housing goals.

Sincerely,



Laura Nunn
Chief of Policy & Education