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Mr. Scott Donaghe  
Principal Planner  
City of Chula Vista  
276 Fourth Avenue  
Chula Vista, CA 91910  
Submitted via email: [sdonaghe@chulavistaca.gov](mailto:sdonaghe@chulavistaca.gov)

**Re: Draft 6<sup>th</sup> Cycle Housing Element**

Dear Mr. Donaghe:

On behalf of the San Diego Housing Federation, we are writing to provide comments and feedback on the draft 6<sup>th</sup> Cycle Housing Element for the City of Chula Vista.

The draft Housing Element contains several actionable items that will help Chula Vista make progress toward meeting its housing goals. In particular, the city's emphasis on by-right approval for affordable housing, enforcement of density minimums, and many efforts to address homelessness and the needs of unsheltered individuals are noteworthy. 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 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 advance Goal #2 to facilitate the construction and provision of quality housing to meet the city's diverse needs (HE-29). 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 3.6 included in this plan to update the City's Density Bonus Ordinance (HE-51). 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 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.

**San Diego's Voice for Affordable 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. 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 demographics report (Appendix A-6), the City of Chula Vista is a diverse community that is predominately Hispanic. Especially in comparison to some other cities in the region, Chula Vista represents a good model for creating inclusive and racially diverse communities. However, the demographics report does not provide data on areas of concentrated poverty that would help Chula Vista identify where certain patterns of community segregation may exist. This information would be helpful for implementation of Housing Program 3.9 to track lower income housing units by District (HE-53) and advance affirmatively furthering fair housing goals.

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**

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. In addition, the City’s Climate Action Plan calls for housing density near transit (Climate Action Plan Strategy Focus #7, page 8). However, the mentions of the Climate Action Plan in the Housing Element are in relation to energy efficiency measures and make no mention of dense, deed-restricted affordable housing as a greenhouse gas reduction tool. 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 Chula Vista in adopting a robust plan that will help to meet the City's housing goals.

Sincerely,



Laura Nunn  
Chief of Policy & Education