

PLANNING COMMISSION

Agenda Item No.: _____
Date: July 26, 2011

CASE NUMBER: PHG11-0028

PROJECT DESCRIPTION: 2013-2020 Housing Element Update Workshop

Background

The Housing Element is one of seven mandatory “elements” of California General Plans. The document assesses the housing needs of all economic segments of each community and defines the goals and policies that will guide the approach to resolving housing needs through a number of recommended programs. State law describes in detail the necessary contents of housing elements, which are reviewed and certified by the State Department of Housing and Community Development (HCD). The document incorporates the most current data and information readily available at the time of writing, which includes data from the 2000 as well as 2010 Census. The element also includes an evaluation of the current Housing Element* (adopted in 2005 online) by assessing the existing policies, and resources of the public and private sector to accommodate housing needs of the community.

Role of the Housing Element

This Housing Element covers the planning period of January 1, 2013 through December 31, 2020. Proposed housing goals and policies (Exhibit A) will be integrated with the General Plan update currently underway. The element focuses on strategies and programs that conserve and improve existing affordable housing; provide adequate housing sites; assist in the development of affordable housing; remove constraints to housing development; and promote equal housing opportunities. Specific housing programs will be incorporated that that will allow the city to support a wide-range of housing densities and intensities that are well-integrated in the community and convenient to facilities and services.

Public Participation

Public participation is critical to the preparation of the Housing Element. Outreach conducted by the city is intended to reach all segments of the community, including lower and moderate income households and persons with special housing needs. Because the Housing Element has a distinct approval process, separate workshops have been scheduled accordingly. A news release and a public notice were prepared prior to the workshop and advertised on the city’s website. Also over 175 e-mails were sent to individuals who have expressed interest in the General Plan Update process.

General Plan Consistency

According to State planning law, the Housing Element must be consistent with the other General Plan elements. While each element is independent, the elements are also interrelated. Certain goals and policies of each element may also address issues that are primary subjects of other elements. This integration throughout the General Plan creates a strong basis for the implementation of plans and programs and achievement of community goals.

*link: <http://www.escondido.org/Data/Sites/1/pdfs/Housing/HousingElement.pdf>

Although the Housing Element is being prepared in conjunction with the proposed General Plan, which considers a range of 3,350 – 5,825 additional housing units, the land use assumptions for calculating available sites to meet proposed housing are based on the *existing* General Plan land use map. This approach assures that final certification of the Housing Element by HCD will not be delayed if the updated General Plan is rejected by the voters in 2012. Consequently, the results of the public vote will not jeopardize Housing Element compliance with State requirements, which requires completion no later than April 27, 2013.

Housing Element Enforcement

The State Department of housing and Community Development has consecutively certified Escondido's Housing Elements since 1981. Enforcement of Housing Elements for non-compliant jurisdictions has been a long-standing issue for the state legislature. Penalties for noncompliance include invalidating a General Plan in its entirety and restricting an agency's land use decision making abilities. If the Housing Element is challenged in court, the court can curtail the local government's ability to approve subdivisions, make zoning changes or issue permits. As an incentive for awarding certain grants, SANDAG has tied Housing Element compliance to the funding of some programs that have benefitted Escondido and other communities in the region.

Regional Housing Needs Assessment (RHNA)

The Housing Element includes consideration of the Regional Housing Needs Assessment (RHNA), which identifies the share of future housing units based on household income levels that have been allocated to the San Diego region by HCD during an 11-year planning cycle (2010-2020) for all socio-economic groups. SANDAG collaborates with all jurisdictions in the region to establish an allocation of housing units for each city and the county in the region. Escondido has actively participated in the RHNA allocation process since SANDAG received the allocation from HCD in 2009. In allocating the region's future housing needs to jurisdictions, SANDAG is required to take the following factors into consideration pursuant to Section 65584 of the State Government Code:

- Market demand for housing;
- Employment opportunities;
- Availability of suitable sites and public facilities;
- Commuting patterns;
- Type and tenure of housing;
- Loss of units in assisted housing developments;
- Over-concentration of lower income households; and
- Geological and topographical constraints.

The RHNA allocates to each city and county a "fair share" of the region's projected housing needs by household income group. The major goal of the RHNA is to assure a fair distribution of housing among cities and counties within the San Diego region, so that every community provides an opportunity for a mix of housing for all economic segments. The housing allocation targets are not building requirements, but are goals for each community to accommodate through appropriate planning policies and land use regulations.

Allocation targets are intended to assure that adequate sites and zoning are made available to address anticipated housing demand during the planning period. A Draft RHNA was released by the SANDAG Board of Directors on May 27, 2010, for a 60-day public review period that proposes the number of very low, low, moderate and above moderate households (Exhibit B). SANDAG anticipates adopting its Regional Housing Needs Allocation (RHNA) in October 2011.

The City of Escondido's share of regional future housing needs is a total of 4,175 new units for the January 1, 2010 to December 31, 2020 period, including 1,833 units for extremely low to low-income households (see Table 1). As discussed, the city's current General Plan can accommodate this anticipated growth if the Draft RHNA allocation is adopted by SANDAG. The General Plan Update, if approved would further increase housing capacity.

Table 1: Housing Needs for 2013-2020

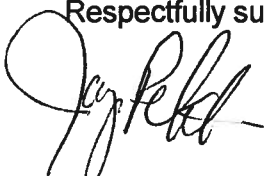
Income Category	Number of Units	Percent
Extremely Low (30% or less)	460	11.0%
Very Low (31 to 50%)	582	13.9%
Low (51 to 80%)	791	19.0%
Moderate (81% to 120%)	733	17.6%
Above Moderate (Over 120%)	1,609	38.5%
Total	4,175	100.0%

The proposed RHNA option would result in Escondido's total lower income share (target households) being 44%, which is significantly higher than the countywide average of 40%. The City Council has directed staff to prepare a letter for the Mayor opposing the proposed SANDAG RHNA allocation and methodology in favor of maintaining a target household allocation that is more closely aligned with the regional average, which would be 1,653 extremely low to low-income housing units (Exhibit C). SANDAG will accept public comments on the Draft RHNA Methodology and Allocation through July 28, 2011.

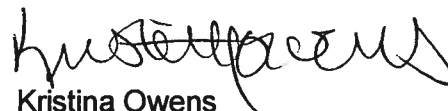
City Council and HCD Consideration

Comments from the workshop, as well as contents of the entire Housing Element containing various programs, will be forwarded to the City Council for consideration on August 10, 2011 at 4:30 p.m. The City Council will provide direction to staff prior to the element's first formal submission to HCD. Any comments from the state would need to be considered by the City Council prior to the City's adoption. Upon adoption by the City the document would be sent back to HCD for certification.

Respectfully submitted,



Jay Petrek
Principal Planner



Kristina Owens
Associate Planner

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Proposed Housing Goals and Policies

GOAL 1: Plan for Quality, Managed, and Sustainable Growth

Housing Policy 1.1

Expand the stock of affordable housing while preserving the health, safety, and welfare of residents, and maintaining the fiscal stability of the City.

Housing Policy 1.2

Pursue a balance of jobs to housing.

Housing Policy 1.3

Channel residential growth to areas where the concurrent provision of services and facilities, including schools, parks, fire and police protection, and street improvements can be assured.

Housing Policy 1.4

Encourage a compact, efficient urban form that conserves land and other natural and environmental resources, and that promotes transit, supports nearby commercial establishments, and takes advantage of infrastructure improvements installed to accommodate their intended intensities.

Housing Policy 1.5

Encourage creative residential developments and partnerships that result in desirable amenities and contribute to infrastructure needs.

Housing Policy 1.6

Incorporate smart growth principles in new residential subdivisions, multi-family projects, and Mixed Use Overlay areas.

GOAL 2: Provide a Range of Housing Opportunities for All Income Groups and Households with Special Needs

Housing Policy 2.1

Accommodate the regional share of housing for all income groups.

Housing Policy 2.2

Ensure a proper balance of rental and ownership housing units.

Housing Policy 2.3

Increase homeownership in the City through education, availability, and affordability.

Housing Policy 2.4

Apply criteria demonstrating appropriateness for converting mobilehome parks to ownership or alternative uses.

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Housing Policy 2.5

Seek ways to eliminate all forms of discrimination based on race, ancestry, national origin or color, religion, sex, familial or marital status, disability, medical condition, age, sexual orientation, or source of income in obtaining housing.

GOAL 3: Enhance the quality of the City's housing stock and preserve the integrity of neighborhood character

Housing Policy 3.1

Maintain and enhance the existing housing stock as a source of low- and moderate-cost housing and as a conservation measure.

Housing Policy 3.2

Seek ways to eliminate substandard housing through continued enforcement of the Health and Safety Code and the provision of programs which facilitate the maintenance and rehabilitation of housing.

Housing Policy 3.3

Utilize code enforcement measures and incentive programs as necessary to ensure that building and safety regulations are met and to promote property maintenance.

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Planning

REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) FACT SHEET



2010 Household Income Limits for a Family of Four

Very Low Income =
0 – 50 percent AMI (\$39,250)

Low Income =
50 – 80 percent AMI (\$62,800)

Moderate Income =
80 – 120 percent AMI
(\$90,600)

Above Moderate Income =
120+ percent AMI

AMI = Area Median Income

AMI for a family of four in 2010
is \$75,500

The San Diego Association of Governments (SANDAG), in consultation with the California Department of Housing and Community Development (HCD), is required by California state law to undertake a Regional Housing Needs Assessment (RHNA) prior to each housing element cycle for the 19 local jurisdictions in the San Diego region -- the 18 cities and County of San Diego. The RHNA process has three main components:

- » RHNA Determination – HCD regionwide housing need determination in four income categories: very low, low, moderate, and above moderate for the housing element cycle;
- » RHNA Plan - SANDAG plan to distribute the RHNA Determination to the local jurisdictions in four income categories; and
- » RHNA Allocation - each jurisdiction's housing need assessment in four income categories for use in updating local housing elements.

The RHNA process for the eight-year, fifth housing element cycle (January 1, 2013 – December 31, 2020) is being conducted in conjunction with the development of the 2050 Regional Transportation Plan (RTP) and its Sustainable Communities Strategy (SCS) in accordance with Senate Bill (SB) 375 (Steinberg).

RHNA/SCS Consistency

SB 375 requires consistency between the RHNA and the development pattern of the SCS. It also requires that the SCS land use pattern, and therefore the RHNA, assist the region in meeting the greenhouse gas (GHG) reduction targets set by the California Air Resources Board (CARB)

RHNA Determination

The overall regionwide housing need for the housing element cycle is based on projections from the California Department of Finance and the SANDAG 2050 Regional Growth Forecast, and on assumptions about the formation rates for new households, vacancy rates, household size, and demolitions, and data from the U.S. Census.

RHNA Methodology and Allocation

The Draft RHNA Methodology and Allocation accepted for distribution and comment by the SANDAG Board of Directors on May 27, 2011, for a 60-day public review, is based on the land use pattern in the 2050 RTP and SCS and the 2050 Regional Growth Forecast, which reflects the region's local general and community plans. These plans indicate that approximately 80 percent of our projected new housing will be multifamily, and 83 percent of our housing in 2050 will be located within a half-mile of high frequency (15 minute headways) transit service. The Draft RHNA Methodology and Allocation distributes housing in accordance with the four RHNA objectives in state law: by reflecting the region's commitment to planning for housing for all income levels in all jurisdictions, balancing jobs and housing, focusing development in our urban areas, and protecting our rural areas, open space, and habitat lands.

RHNA Process and Public Involvement

SANDAG worked with the region's planning directors (Regional Planning Technical Working Group) and Regional Housing Working Group to develop the Draft RHNA Methodology and Allocation to distribute

(Continued on reverse)



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**Regionwide Distribution of RHNA
Determination by Income Category**
January 1, 2010 – December 31, 2020
(RHNA Projection Period)

Income Categories	%	units
Very Low	22.5%	36,450
Low	17.1%	27,700
Moderate	18.9%	30,610
Above-Moderate	41.5%	67,220
Total		161,980

the regionwide housing need to the 18 cities and County of San Diego in the four income categories. The development of the Draft RHNA Methodology and Allocation took place over a 12-month period during numerous public meetings conducted by the working groups, Regional Planning Committee, and SANDAG Board of Directors.

To read more about the RHNA and to comment on the Draft RHNA Methodology and Allocation, visit www.sandag.org/rhna. **Public comments will be accepted through July 28, 2011.**

**Draft RHNA Methodology
and Allocation***

	RHNA Allocation by Income Category						Estim. Existing Plan Capacity
	11-Year RHNA	Very Low	Low	Moderate	Above Moderate	VL + Low**	20+ du/ac
Carlsbad	4,999	912	693	1,062	2,332	1,605	1,605
Chula Vista	12,861	3,209	2,439	2,257	4,956	5,648	21,899
Coronado	50	13	9	9	19	22	270
Del Mar	61	7	5	15	34	12	12
El Cajon	5,805	1,448	1,101	1,019	2,237	2,549	13,225
Encinitas	2,353	587	446	413	907	1,033	1,293
Escondido	4,175	1,042	791	733	1,609	1,833	2,582
Imperial Beach	254	63	48	45	98	111	1,784
La Mesa	1,722	430	326	302	664	756	6,498
Lemon Grove	309	77	59	54	119	136	828
National City	1,863	465	353	327	718	818	18,200
Oceanside	6,210	1,549	1,178	1,090	2,393	2,727	4,751
Poway	1,253	201	152	282	618	353	353
San Diego	88,096	21,977	16,703	15,462	33,954	38,680	158,273
San Marcos	4,183	1,043	793	734	1,613	1,836	2,931
Santee	3,660	914	694	642	1,410	1,608	1,650
Solana Beach	340	85	65	59	131	150	262
Vista	1,374	343	260	241	530	603	1,731
Unincorporated	22,412	2,085	1,585	5,864	12,878	3,670	3,670
11-Year RHNA Totals		36,450	27,700	30,610	67,220	64,150	241,817
		22.5%	17.1%	18.9%	41.5%	39.6%	

*Table 2b. Lower Income Capacity Option. This table excerpted from the May 27, 2011 RHNA Board Report.

**Allocation proposal is based on estimated existing plan capacity, or regional allocation, whichever is lower in jurisdictions where estimated existing plan capacity is exceeded.



Sam Abed
Mayor
201 North Broadway, Escondido, CA 92025
Phone: 760-839-4610 Fax: 760-839-4578

July 20, 2011

Susan Baldwin, Senior Regional Planner
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Re: Draft RHNA Methodology and Allocation

Dear Ms. Baldwin:

Thank you for the opportunity to comment on the Draft Regional Housing Needs Assessment (RHNA) Methodology and Allocation that is currently under consideration by the SANDAG Board of Directors. The City of Escondido has been an active participant in the RHNA process. However, The City of Escondido would like to go on record as firmly *opposing* the proposed Draft RHNA Methodology and Allocation that assigns Escondido 1,833 Very Low and Low Income Households (Target Households) for the upcoming Housing Element cycle (2013 – 2020). We strongly recommend a more equitable distribution of dwelling units for Target Households based on information contained in this letter.

Escondido understands the importance of planning for housing for all income levels in all jurisdictions, balancing jobs and housing, focusing development in urban areas consistent with Smart Growth principles, and protecting rural areas, open space, and habitat lands. Our history of consecutive Housing Element certifications extends 30 years, to 1981. Escondido contains a significant number of affordable units that are not income restricted. There are currently over 1,630 income-restricted units within the City. Additionally, 292 low and very low income households that are on the Federal Section 8 waiting list receive monthly rental subsidies from the City of Escondido totaling \$100 - \$125 each. These are only two of the many programs operated by Escondido that demonstrate the city's commitment for safe, clean and affordable housing.

As you are aware, housing element law contains objectives for preparing the RHNA Plan. Government Code Section 65584(d) provides that the: "regional housing needs allocation plan *shall* be consistent with *all* of the following objectives:

RHNA GOVERNMENT CODE OBJECTIVE:

- 1) Increase the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in all jurisdictions receiving an allocation of units for low- and very low- income households.

RESPONSE:

During the RHNA process each jurisdiction's percentage of existing Target Households was identified, and the Regional Average was determined to be 40% (Table 4 from May 27, 2011 SANDAG agenda;

Susan Baldwin
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attached). The jurisdictions' existing percentage of Target Households ranges from 21% (Poway) to 61% (National City). Eleven (11) of the 19 jurisdictions in the region currently have a percentage of Target Households at or below the Regional Average. Escondido's existing percentage of Target Households is 44%, which exceeds the Regional Average. The Draft RHNA Methodology allocates 1,833 Target Households to Escondido which exceeds the Regional Average by 180 units. Escondido strongly opposes this allocation methodology and firmly believes allocations should equitably distribute Target Households in a manner that more closely aligns each jurisdiction's percentage of Target Households with the regional average. Under this approach Escondido's equitable Target Household allocation would be 1,653 units.

RHNA GOVERNMENT CODE OBJECTIVES:

- 2) Promote infill development and socioeconomic equity, the protection of environmental and agricultural resources and the encouragement of efficient development patterns.
- 3) Allocate a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared with the most recent decennial United States census.

RESPONSE:

Escondido believes there is a socioeconomic equity issue with regard to the proposed allocation of Escondido's Target Household units in light of the City's current conditions. The Draft Methodology proportionately allocates fewer Target Household units to more affluent cities that already contain significantly fewer Target Households than the regional average. SANDAG has reported that Escondido maintains the lowest median income of all San Diego North County cities (\$56,259) based on 2010 Census information. This income level is significantly less than the regional average of \$62,771 and only slightly more than one-half of the top-ranked city's median income. A goal of Escondido's General Plan Update that is currently underway is to improve the city's current jobs / housing balance and raise median income levels. While Escondido recognizes the importance of providing opportunities for Target Households, obligating the city to provide more than the regional average exacerbates efforts of raising the community's median income by further amplifying socioeconomic inequity in the community.

RHNA GOVERNMENT CODE OBJECTIVE:

- 4) Promote an improved intraregional relationship between jobs and housing.

RESPONSE:

Escondido currently maintains only 3.4% of its land area for employment purposes based on SANDAG 2009 Employment and Residential Land Inventory. This is less than the regional average of 3.9% and significantly less than all San Diego North County communities which range from 5.1% (Poway) to 22.9% (Carlsbad). This has resulted in a significant out-migration of commuters from Escondido to employment areas in other jurisdictions. The proposed RHNA methodology degrades the intraregional relationship between jobs and housing by allocating a disproportionate share of Target Households to Escondido rather than to jurisdictions that can provide employment opportunities in closer proximity to housing, thus reducing commuting patterns.

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Overall, the Draft Methodology appears to reward more affluent jurisdictions that have adopted General Plans with more restrictive land use designations (i.e. less residential capacity) by allocating them a lower number of Target Household units. The RHNA Fact sheet (Page 2 attached) states that the "allocation proposal is based on estimated existing plan capacity, or regional allocation, whichever is lower in jurisdictions where estimated existing plan capacity is exceeded." Escondido *strongly* opposes this methodology and feels that jurisdictions should not be allocated fewer units simply because their General Plans do not currently accommodate growth. The State Department of Housing and Community Development does not accept this approach in certifying Housing Elements and will require that agencies amend their General Plan to accommodate additional units. The City is willing to accept up to 1,653 Target Household units, which is consistent with the regional average. However, Escondido should *not* be required to accommodate more Target Household units than the regional average simply because other jurisdictions' General Plans currently do not have capacity, or do not choose to amend their General Plan policies to increase capacity.

Thank you for the opportunity to comment on the RHNA Methodology and Allocation. Based on the reasons cited in this letter the City of Escondido strongly urges the SANDAG Board of Directors' consideration in this matter.

Respectfully Submitted



Sam Abed
Mayor

- Attachments: 1) Table 4 "Household by Income and Very Low and Low Income Allocation Percentages for RHNA Options" from 5/27/2011 SANDAG meeting
2) Regional Housing Needs Assessment Fact Sheet (Page 2)

CC: Escondido City Council
Jeffrey Epp, City Attorney
Clay Phillips, City Manager
Charles Grimm, Assistant City Manager
Barbara Redlitz, Director of Community Development

Table 4. Households by Income and Very Low & Low Income Allocation Percentages for RHNA Options

11-Year RHNA (1/1/2010 - 12/31/2020)

	Households by Income (2000 Census)	Regional Share Option (Table 1c)	Lower Income Capacity Option (Table 2b)	Lower Income Capacity Option with Jobs/Housing Balance Adjustment (Table 2c)	Regional Share Option with Jobs/Housing Balance and Income Adjustment (Table 3a)	Regional Share Option with Jobs/Housing Balance, Income, and Transit Adjustment (Table 3c)	Regional Share Option with Jobs/Housing Balance, Income, Transit and Unincorporated Area Capacity Adjustment (Table 3d)
	VL + Low	VL + Low	VL + Low	VL + Low	VL + Low	VL + Low	VL + Low
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
Carlsbad	27%	40%	32%	36%	47%	43%	46%
Chula Vista	42%	40%	44%	36%	33%	33%	31%
Coronado	25%	40%	44%	32%	34%	44%	40%
Del Mar	25%	40%	20%	23%	51%	54%	56%
El Cajon	53%	40%	44%	40%	36%	42%	42%
Encinitas	27%	40%	44%	39%	40%	38%	41%
Escondido	44%	40%	44%	44%	41%	41%	44%
Imperial Beach	52%	40%	44%	31%	28%	44%	31%
La Mesa	44%	40%	44%	39%	36%	50%	45%
Lemon Grove	47%	40%	44%	34%	31%	32%	29%
National City	61%	40%	44%	44%	37%	54%	50%
Oceanside	40%	40%	44%	30%	29%	26%	18%
Poway	21%	40%	28%	37%	56%	48%	49%
San Diego	41%	40%	44%	47%	44%	46%	48%
San Marcos	40%	40%	44%	45%	42%	40%	43%
Santee	32%	40%	44%	32%	32%	24%	17%
Solana Beach	27%	40%	44%	41%	42%	38%	41%
Vista	42%	40%	44%	46%	43%	47%	48%
Unincorporated Region	34%	40%	16%	16%	29%	21%	16%
	40%	40%	40%	40%	40%	40%	40%

Notes:

- (a) Proportion of households in Very Low and Low Income categories (Where "Very Low" is defined as less than 50% of regional median household income and "Low" is defined as 50-80% of regional median household income defined by California Dept. of Housing and Community Development).
- (b) Percent of Very Low + Low Income Units under the Regional Share Option (Table 1c)
- (c) Percent of Very Low + Low Income Units under the Lower Income Capacity Option (Table 2b)
- (d) Percent of Very Low + Low Income Units under the Lower Income Capacity Option with Jobs/Housing Balance Adjustment (Table 2c)
- (e) Percent of Very Low + Low Income Units under the Regional Share Option with Jobs/Housing Balance and Income Adjustment (Table 3a)
- (f) Percent of Very Low + Low Income Units under the Regional Share Option with Jobs/Housing Balance, Income, and Transit Adjustment (Table 3c)
- (g) Percent of Very Low + Low Income Units under the Revised Regional Share Option with Jobs/Housing Balance, Income, Transit and Unincorporated Area Capacity Adjustment (Table 3d)

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**Regionwide Distribution of RHNA
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**Draft RHNA Methodology
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Vista	1,374	343	260	241	530	603	1,731
Unincorporated	22,412	2,085	1,585	5,864	12,878	3,670	3,670
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