

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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March 29, 2021

Melanie Kush, Director
Development Services Department
City of Santee
10601 Magnolia Ave.
Santee, CA 92071

Dear Melanie Kush:

RE: Review of Santee's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Santee's (City) draft housing element received for review on January 28, 2021, along with revisions received on March 17 and 26, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by communications in March with the City's housing element team. In addition, HCD considered comments from the San Diego Housing Federation pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revision will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code).

Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction (Gov. Code, § 65583, subd. (c)(10)(A)).

Affirmatively Furthering Fair Housing: Additional analysis is needed to comply with State Housing Element Law regarding affirmatively furthering fair housing. The housing element must include a complete assessment of fair housing issues, including evaluating trends and patterns at a local level for persons with disabilities, persons by familial status and households by income. The assessment must also discuss the level of persons with disabilities relative to the region and address patterns and trends of overpayment, overcrowding and displacement risk within the locality. The assessment must include analysis around other relevant factors that contribute, or have contributed, to fair housing issues in the jurisdiction. This analysis should consider information beyond data that identifies and compares concentrations of groups with protected

characteristics. Examples of this analysis include: a historical recollection of changes and barriers in zoning, land use rules, and place-based investments, discussion of demographic trends, and policies and practices that led to patterns which reduce fair housing choice. Additionally, the element must complement the summary of fair housing issues within the jurisdiction with local data and knowledge. The element must also identify and prioritize key contributing jurisdiction-specific contributing factors to fair housing issues. In addition to examining identified sites relative to access to opportunity, the element must identify and analyze whether sites are located throughout the community to affirmatively further fair housing, including factors such as concentrated areas of race and poverty, overpayment, overcrowding, housing conditions and displacement risk. Lastly, the element must include programs that (1) enhance housing mobility strategies, (2) encourage development of new affordable housing in areas of opportunity, (3) improve place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and (4) protect existing residents from displacement. HCD will send data and examples under separate cover.

The element will meet the statutory requirements of State Housing Element Law once it has been revised to comply with the above requirement.

For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

To remain on an eight-year planning cycle, the City must adopt its housing element within 120 calendar days from the statutory due date of April 15, 2021 for SANDAG localities. If adopted after this date, Government Code section 65588, subd. (e)(4) requires the housing element be revised every four years until adopting at least two consecutive revisions by the statutory deadline. For more information on housing element adoption requirements, please visit HCD's website at: http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb375_final100413.pdf

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

For your information, some General Plan element updates are triggered by housing element adoption. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at:

http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and
http://opr.ca.gov/docs/Final_6.26.15.pdf.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City meets housing element requirements for these and other funding sources.

HCD appreciates the dedication and thoroughness the City's housing element team provided during the course of our review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Jose Ayala, of our staff, at Jose.Ayala@hcd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannan West". The signature is fluid and cursive, with the first name "Shannan" written in a larger, more prominent script than the last name "West".

Shannan West
Land Use & Planning Unit Chief