

February 7, 2022

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Sacramento County Board of Supervisors
700 H Street, Suite 2450
Sacramento, CA 95814

RE: Housing Element Revisions

Dear Honorable Chair Nottoli and Board of Supervisors,

The Sacramento Housing Alliance has provided comments about the County's draft and adopted housing element for the 2021-2029 planning period. We have attended all of the public meetings regarding the housing element and have appreciated the opportunity to meet with and work with County Planning Staff. While we appreciate the changes that were made to respond to some of our comments, additional changes remain necessary to comply with State housing element law. The following comments describe the revisions necessary for the County of Sacramento's 2021-2029 Adopted Housing Element.

Sites Inventory

Large Sites

Program A8 (Facilitate Affordable Housing on Large Sites), was revised to include a goal of producing 1000 units by 2029. However, the program was not revised to include "an implementation component beyond exploring mechanisms to develop affordable housing on large sites" as required by HCD's October 28, 2021 letter. It is unclear how "striving" to streamline... is sufficient to facilitate the development of affordable housing on large sites. Difficulty in developing affordable housing on sites of 10 acres or more include other constraints such as cost of sites, etc. The program now commits to "develop" vs "explore" requiring developers of large sites to include development of affordable units or dedicate land for affordable housing, however, the program does not identify a date by which this requirement will be adopted or how it will be implemented. The program should be revised to include additional specific incentives and regulatory concessions to support the development of housing affordable to lower income households and include a deadline for implementation early enough in the planning period to facilitate the timely development of affordable housing.

The program should also address how the sites identified in Table C-27 will comply with or address the SHRA Multifamily Lending Guideline standards referenced in the program given the Guidelines indicate new construction projects may not exceed 200 units.

Affirmatively Furthering Fair Housing

The County is continuing to rely on its Affordable Housing Ordinance to remedy the lack of different housing types and affordability in high resource areas (Program E3). However, the element does not describe how the Ordinance's current fee only option will address affirmatively furthering fair housing locational concerns. Will fee resources be targeted to supporting development of affordable homes in highest, high or moderate resource areas? Program E3 should commit the County to taking actions that support its priority and goal of creating housing opportunities for lower income households in all areas of the County.

Programs

Further revisions are necessary to ensure the programs meet the requirements of Government Code Section 65583(c) which requires specific actions and deadlines to demonstrate a beneficial impact within the planning period.

Examples include:

- **A2:** By-Right Development on Land Inventory (identified in prior planning period): The program will not be implemented until May 2024, however those sites must be approved by right. How will the County ensure any development proposals on identified sites prior to May 2024 are approved by-right?
- **A8:** As noted above, the element must include more specific strategies and commitments to facilitate the development of affordable housing on large sites. Without a clear commitment to specific actions, these large sites should not be included in the land inventory.
- **D15:** As noted in prior reviews, this program must explain/evaluate the positive and potential negative impacts of deducting points for projects proposed in areas of high concentrations of poverty. For example, would point deductions for projects in areas of high concentrations of poverty, eliminate any prospect of funding for the project? Would a program that incentivizes new affordable housing in areas of opportunity AND a strategy to promote new investments including for safe, accessible and affordable homes in areas of high poverty provide a more effective and balanced approach? The element and programs should demonstrate how strategies and policies will incentivize affordable housing in areas of opportunity while also reinvesting in areas of concentrations of poverty and disinvestment.
- **E3 & E7:** The County should also continue to explore additional local financing mechanisms to build affordable homes for households who make an extremely low income. This should be done before December 2023, the current target date for evaluation of the Affordable Housing Ordinance.
- **G1:** The program should more specifically describe which goals, strategies and actions specific to Sacramento County will be

implemented. In addition, the objective of the program is listed as "Improve the level of reporting to measure success in reducing housing discrimination." However, it should also describe how strategies will address patterns of segregation and concentrations of poverty.

SHA remains ready to continue working together to ensure the housing element complies with the law and serves as an effective tool to address the County's critical affordable housing needs.

Sincerely,

A handwritten signature in black ink, appearing to be "Kendra Lewis". The signature is stylized with a large loop at the top and a horizontal line extending to the right.

Kendra Lewis, Executive Director
Sacramento Housing Alliance

A handwritten signature in black ink, appearing to be "Cathy Creswell". The signature is written in a cursive style.

Cathy Creswell, Board President
Sacramento Housing Alliance

CC: Hillary Prasad- Specialist, Housing Policy Division