



THE CITY OF SAN DIEGO

MEMORANDUM

DATE: September 27, 2023

TO: Planning Commission

FROM: Martha Blake, Development Project Manager, Development Services Department *MB*

SUBJECT: Item 2- All Peoples Church, Project No. 636444

City staff has amended the Planning Commission report and the permit resolution for the All Peoples Church submitted as Item 2 on the September 28, 2023, Planning Commission agenda.

The Housing Impact Statement on page 2 of the report shall be revised as follows:

Housing Impact Statement: This project does not propose housing, nor does it propose to change the underlying zone, but with this proposed development, no housing would be built on residentially zoned land that may be able to accommodate 52 dwelling units based on the underlying RS-1-7 Zone and the size of the property. The Housing Element Adequate Sites inventory also identified this site as having a net potential of 49 units.

The permit resolution has been updated to include (Section III A and B) an adequate site analysis and its findings pursuant to California Government Code Section 65863(b).

III. California Government Code Section 65863(b) Findings

This project does not propose housing, nor does it propose to change the underlying zone, but with this proposed development, no housing will be built on residentially zoned land that has been identified for the potential for the development for a net potential of 49 housing units based on the underlying RS-1-7 Zone and the size of the property. While there is no reduction in development potential or rezone of the underlying base zone for the property site, the below findings are included as part of the permit approval.

A. California Government Code Section 65863(b)(1) Written Findings:

1. The reduction is consistent with the adopted general plan, including the housing element.

See Finding I.1.a. under "Planned Development Permit" above. As discussed in more detail below in the adequate site analysis, the City will still have an additional

capacity of 48, 599 housing units for moderate and above moderate-income housing units without the housing unit capacity on the site for this project. The potential reduction is consistent with both the General Plan, including the Housing Element.

2. **The remaining sites identified in the housing element are adequate to meet the requirements of California Government Code section 65583.2 and to accommodate the City’s share of the regional housing need pursuant to California Government Code section 65584. This finding includes a quantification of the remaining unmet need for the City’s share of the regional housing need at each income level and the remaining capacity of sites identified in the housing element to accommodate that need by income level.**

The Housing Element Adequate Sites Inventory identified 174,673 potential housing units of which 72,191 are available for lower income housing, meaning housing units that are affordable (rent-restricted) to households of extremely low, very low, or low income. The remaining 102,482 housing units would be available for moderate and above moderate-income households.

The Adequate Sites Inventory by income category is as follows:

| <u>Income Category</u> | <u>Net Potential Housing Units</u> |
|--|---|
| <u>Lower Income</u> | <u>72,191</u> |
| <u>Moderate and Above Moderate-income</u> | <u>102,482</u> |
| <u>TOTAL</u> | <u>174,673</u> |

The City’s regional housing need allocation (RHNA) in the SANDAG RHNA Plan was 108,036 housing units which the City will need to permit during the 6th Housing Element Cycle between 2021-2029 to meet the RHNA allocation.

In 2021 and 2022, the first two years of the 6th Housing Element Cycle, the City has permitted 10,428 housing units (Housing Element Annual Progress Report Table B, Pg 55). This means the City will need to permit 97,608 housing units by 2029.

The RHNA Allocation housing units by each income category as follows:

| | <u>RHNA Allocation</u> | <u>Issued Permits (2021-2022)</u> | <u>RHNA Remaining</u> |
|-------------------------------------|-------------------------------|--|------------------------------|
| <u>Very Low Income</u> | <u>27,549</u> | <u>645</u> | <u>26,904</u> |
| <u>Low Income</u> | <u>17,331</u> | <u>438</u> | <u>16,893</u> |
| <u>Moderate-income</u> | <u>19,319</u> | <u>61</u> | <u>19,258</u> |
| <u>Above Moderate-income</u> | <u>43,837</u> | <u>9,284</u> | <u>34,553</u> |
| <u>TOTAL</u> | <u>108,036</u> | <u>10,428</u> | <u>97,608</u> |

The site of the project was identified as a potential site for housing development in the Housing Element Adequate Sites Inventory with the potential for 49 housing units, none of which were identified as lower income housing units. Therefore, the removal of the site would result in 49 fewer potential housing units in the Adequate

Sites Inventory. None of these housing units would be available for lower income housing.

With the approval of this project, there will be 102,433 housing units (102,482 housing units minus the 49 housing units identified on the project site) available for moderate and above moderate-income units in the Adequate Sites Inventory. To meet the RHNA Allocation, the City will need to permit 53,791 moderate and above moderate housing units (19,258 housing units plus 34,533 housing units). The Adequate Sites Inventory would still have an additional capacity of 48,599 housing units (102,433 housing units minus the 53,834 housing units) for moderate and above moderate-income housing units without the residential capacity at this project site.

In the past two years, the City has adopted two community plan updates that have added additional capacity for homes in the City. The City also expanded the applicability of its housing incentive programs which includes Complete Communities Housing Solutions and the Affordable Dwelling Unit Home Density Bonus through the adoption of the Sustainable Development Area. These plans and program expansions were not included in the Adequate Sites Inventory and demonstrates how the City continues to add capacity beyond the inventory during the Housing Element Cycle.

This finding identifies the remaining sites identified in the Housing Element and demonstrate they are adequate to meet the requirements of California Government Code section 65583.2 and to accommodate the City's share of the regional housing need pursuant to California Government Code section 65584. This finding includes a quantification of the remaining unmet need for the City's share of the regional housing need at each income level and the remaining capacity of sites identified in the housing element to accommodate that need by income level.

B. California Government Code Section 65863(b)(2) Written Findings:

- 1. Remaining sites identified in the housing element are adequate to meet the requirements of California Government code Section 65583.2 and to accommodate the City's share of the regional housing need pursuant to California Government Code section 65584. This finding includes a quantification of the remaining unmet need for the jurisdiction's share of the regional housing need at each income level and the remaining capacity of sites identified in the housing element to accommodate that need by income level.**

See Finding III.A.2 above. There will be 102,433 housing units (102,482 housing units minus the 49 housing units identified on the project site) available for moderate and above moderate-income units in the Adequate Sites Inventory when this permit is approved. To meet the RHNA Allocation, the City will need to permit 53,791 moderate and above moderate housing units (19,258 housing units plus 34,533 housing units) from. The Adequate Sites Analysis would still have an additional capacity of 48,599 housing units (102,433 housing units minus 53,834 housing units)

for moderate and above moderate-income housing units without the residential capacity at this project site.

The City has identified remaining sites identified in the housing element that are adequate to meet the requirements of California Government Code Section 65583.2 and to accommodate the City's share of the regional housing need pursuant to California Government Code section 65584. This finding includes a quantification of the remaining unmet need for the City's share of the regional housing need at each income level and the remaining capacity of sites identified in the Housing Element to accommodate that need by income level.