



October 4, 2021

San Clemente City Council
City Hall, 100 Avenida Presidio
San Clemente, California

Re: Draft Housing Element Update, 6th Cycle (2021-2029)

Dear Mayor Ward, Mayor Pro Tem James and Councilmembers Duncan, Ferguson and Knoblock,

We write representing the Welcoming Neighbors Home (WNH) Initiative, a ministry of Tapestry Unitarian Universalist Congregation – which has members in South Orange County – including San Clemente. The WNH initiative works to end homelessness and promote the development of more affordable housing – especially for those with extremely low and very low incomes.

We have reviewed the most recently [revised San Clemente housing element draft dated September 2021](#). We have also reviewed the public comments and **we particularly agree with comments submitted by the San Clemente Affordable Housing Coalition** – which are located on [Page 387 of Part 3 of the Housing Element Update](#) on the October 5 City Council Agenda .

We wish to highlight the following recommendations:

1. We recommend that the **review of Program 6, the Inclusionary Housing Policy, be moved up to 2023**. We would like to see the city adopt an inclusionary housing ordinance that will require that at least 15% of any new development of 6 or more units be for very low income people, i.e., those earning less than \$50,000 per year. When this is not possible, we urge the city to require an in-lieu fee of at least \$10,000 to \$15,000 per unit - to build a fund for building affordable housing elsewhere.
2. With regard to the **Site Inventory**:
 - a. We were glad to see the addition of the closed hospital on the list.
 - b. **“Site A” – 190 Ave. La Pata**: 2.17 acres of vacant land – rather than the proposed zoning of Housing Overlay RMH (30 du/a), this site should be rezoned for greater density as Housing Overlay RH (45 du/a) – the same zoning as proposed for the newly added “closed hospital” (“site V”).

- c. **Parcels ## 688-011-01 and 688-011-02** on Avenida Pico, owned by the Emergency Shelter Coalition (ESC), should be zoned High Density Residential, for low/very low affordable housing, and these parcels should also be included within the Emergency Shelter Overlay.
 - d. We request that **all of the vacant sites be rezoned for lower income affordable housing** because vacant sites are more likely to be developed than parcels with existing uses.
3. **Accessory Dwelling Units (ADUs)** - We note the projection of 120 ADUs to help the city meet its RHNA goals.
- a. Given this high reliance on ADUs to meet its RHNA goals, we recommend that **ADU owners be required to report rental rates annually** so that the City can track its progress in meeting its low income RHNA goal.
 - b. We also ask the city to **adopt programs that would incentivize ADU owners to rent their ADU at affordable rates** – such as:
 - i. the ADU Forgivable Loan program in Santa Cruz (see attached),
 - ii. in exchange for committing to offer low rents, significantly reduce permit fees and application fees for construction of ADUs
 - iii. provide a set of pre-approved ADU designs in order to streamline the approval of the ADU’s construction.

The need for more affordable housing for those earning less than \$50,000 per year is acute. We urge the city to take proactive steps, such as those outlined above, to promote the production of more affordable housing in San Clemente.

Now, with funding available from the State of California’s HomeKey funds (https://homekey.hcd.ca.gov/sites/default/files/2021-09/NOFA_Homekey_0.pdf), and the federal government American Rescue Plan Act funds, it is important for the city to take advantage of these funding sources to make important strides in the provision of affordable housing.

Thank you for considering our public comment – and for your public service.

Sincerely,

Rona Henry
 Chair, Welcoming Neighbors Home, Tapestry Unitarian Universalist Congregation

Rev. Kent Doss
 Minister, Tapestry Unitarian Universalist Congregation

cc: Planning Commission Chair Crandell, Chair Pro Tem McKhann, Vice Chair Tyler and Planning Commissioners Cosgrove, Camp, McCaughan and Prescott-Loeffler
 Jennifer Savage, San Clemente Planner
 Cesar Covarrubias, Kennedy Commission
 Richard Walker, Public Law Center
 Paul McDougall, Chelsea Lee, Marisa Prasse, Colin Cross, Mashal Ayobi, California Department of Housing and Community Development