

**Summary of Legal Aid's Proposed Revisions to the Draft Housing Element**

The City Council should make the following revisions to the Draft Housing Element:

1. Revise the Housing Element to reflect that extremely low income residents comprise 19% of the City's households and the extremely low income RHNA number is 1,342 units.
2. Revise the Housing Element to analyze the housing needs of extremely low income households.
3. Revise the Housing Element to include 2006 and 2007 American Community Survey census data to update 2000 census data.
4. Revise the Housing Element to identify extremely low income households as a special needs group based upon the high number of extremely low income households in the City (33,013 households) and the incredibly difficult time they have finding housing.
5. Revise the Housing Element to include an analysis of the following constraints to the development of affordable housing: (a) conditional use permits and their impact on the siting of housing for persons with disabilities; (b) the adequacy of the City's coastal zone replacement housing policy; (c) the City's reverse inclusionary housing policy; and (d) the impacts of condominium conversions on the City's rental housing stock.
6. Revise the Housing Element to include information regarding rent levels, sales prices and funding streams for affordable units built since 2006 if they are counted towards meeting the City's RHNA numbers.
7. Revise the Housing Element to remove credits taken towards the City's RHNA numbers for units that are part of development applications that have been submitted to the City but have not received entitlements.
8. Revise the identification of available sites to include an analysis regarding how existing uses may constitute an impediment to residential development, as all but two of the sites identified in the Housing Element currently have existing non-residential uses.
9. Revise the Housing Element to reflect that the Housing Trust Fund is essentially unfunded and it has not produced one unit of affordable housing since it was created.
10. Revise the Housing Element to reflect that two separate consultants hired by the City concluded that a commercial linkage fee was economically feasible. The Housing Element should further be revised to state that such a fee has not yet been voted on by the City Council.
11. Revise the Housing Element discussion regarding the City's progress towards meeting its 2000-2005 RHNA numbers to clarify whether or not the City has permissibly taken credits for units that were substantially rehabilitated.

12. Revise the Goals and Objectives Section of the Housing Element so that there is a corresponding goal and objective for each housing need, resource inadequacy and constraint identified in the Housing Element.
13. Revise the Housing Element to include the creation of an SRO ordinance that permits SRO's in any high density multi-family residential zone or commercial/light/industrial zone. (SRO housing should not require a conditional use permit and it should not be grouped with Special Group Residences as it currently is the Housing Element.)
14. Revise the Housing Element's Programs Section to include specific attainable programs and actions and remove vague and non-specific commitments.
15. Revise the Housing Element to include the following programs to encourage the production of affordable housing:
  - A. A comprehensive funding plan for the housing trust fund
  - B. A mixed income housing ordinance
  - C. A commercial linkage fee (to create a jobs/housing balance)
  - D. A condominium conversion fee
  - E. An increase of the redevelopment housing set aside from the minimum 20% to 30; and
  - F. Community land trusts (to create permanent affordable housing)