

1. CONSERVING AND IMPROVING THE EXISTING HOUSING STOCK

While most of Santee's housing stock is in good condition, a large proportion of the City's housing is nearing or has already exceeded 30 years of age, indicating the need for continued maintenance to prevent widespread housing deterioration. Other housing conservation needs of the City include existing affordable housing stock and rental units at-risk of converting to market-rents or condominiums, and the Housing Choice Voucher Program.

Objective 1.0: Conserve and improve the condition of the existing housing stock.

Policy 1.1: Advocate the rehabilitation of substandard residential properties by homeowners and property owners.

Policy 1.2: Offer a residential rehabilitation program that provides financial and technical assistance to lower income property owners to enable correction of housing deficiencies.

Policy 1.3: Focus rehabilitation assistance to create substantive neighborhood improvement and stimulate additional privately initiated improvement efforts.

Policy 1.4: Continue to utilize the City's code compliance program to bring substandard units into compliance with City codes and to improve overall housing quality and neighborhood conditions in Santee.

Policy 1.5: Promote increased awareness among property owners and residents of the importance of property maintenance to long-term housing quality. Educate property owners regarding existing resources for residential rehabilitation.

Objective 2.0: Preserve existing affordable housing options in Santee.

Policy 2.1: Monitor the status of at-risk multi-family rental housing units, work with potential purchasers/managers as appropriate, and explore funding sources available to preserve the at-risk units.

Policy 2.2: Encourage the retention of existing, viable mobile home parks, which are economically and physically sound.

Policy 2.3: Regulate the conversion of existing multi-family rental properties to condominiums through application of Santee's Condominium Conversion Ordinance.

Policy 2.4: Continue to support rental assistance programs through the County.

Program 1: Mobile Home Assistance Program and Conversion Regulations

Administered through the State HCD, the Mobile Home Park Assistance Program (MPAP) provides financial and technical assistance to mobile home park residents who wish to purchase their mobile home parks and convert the parks to resident ownership. Loans are made to lower income mobile home park residents or to organizations formed by park residents to own and/or operate their mobile home parks, thereby allowing residents to control their housing costs. Loans are limited to 50 percent of the purchase prices plus the conversion costs of the mobile home park and are awarded by the State on a competitive basis. Applications must be made by mobile home park residents who must form a resident organization with the local public entity as a co-applicant.

The City will continue to advertise MPAP’s availability to mobile home park residents and will serve as co-applicant for interested resident organizations. The City’s Zoning Ordinance, through the Mobile Home Park Overlay District, provides for a 50 percent reduction in project application fees as an incentive for the conversion of existing rental parks to resident-owned parks. Also, when considering a Conditional Use Permit for conversion to a different use, the City Council shall ensure that applicants have satisfied the requirements of Sections 65863.7 (“Report of impact on conversion of mobile home park to another use”) and 65863.8 (“Verification of notification by applicant for conversion of mobile home park to another use”) of the California Government Code. These provisions assure that mobile home park occupants are afforded some protection if an existing facility is to be rezoned for another use.

- Responsible Agency:** City of Santee Department of Development Services
- Financing:** Mobile home conversion fees; Department budget
- 2021-2029 Objectives:** Circulate fliers to existing mobile home renter parks periodically. Co-sponsor MPAP applications as opportunity arises. [Post information at mobilehome parks on tenant protection services such as rent stabilization and eviction protection. Consider in 2022 utilizing SB2 Permanent Local Housing Allocation \(PLHA\) funding to provide rent subsidies to low income mobile home park tenants.](#)
- Timeframe:** Annual flier circulation and monitoring and annual monitoring and reporting throughout the planning period.

Program 2: Maintenance and Improvement of Existing Housing

Nearly 88 percent of the City’s existing housing stock will exceed 30 years of age by the end of this Housing Element planning period (built before 2000). Continued maintenance will be essential to prevent widespread housing deterioration. In order to encourage maintenance and improvement of existing housing, the City will advertise available home improvement financing programs to residents on its website and public service counters. The City will also work to engage home improvement program representatives to provide an overview of such programs at least one public meeting before the City Council. Code compliance targeted at substandard and/or dilapidated housing will continue to be implemented, including exercising the use of court-appointed receiverships, as appropriate. The City will also make residents aware of basic home maintenance standards on its website.

- Responsible Agency:** City of Santee Department of Development Services
- Financing:** Department Budget
- 2021-2029 Objectives:** Ensure that Code Compliance addresses and resolves issues with severely substandard and/or dilapidated housing and that residents

are aware of home maintenance standards and programs. In 2022, develop tenant protection policies to mitigate displacement impacts on tenants of substandard housing.

Timeframe: Ongoing implementation and annual monitoring and reporting throughout the planning period.

Program 3: Conservation of Existing and Future Affordable Units

Between 2021 and 2031, 222 units would be considered at risk of converting to market rate rents. Of these units, 47 are within the Cedar Creek Apartments, 43 within the Forester Square Apartments, and 132 in the Laurel Park Senior Apartments. The City will continue to monitor these at-risk units and should a notice of intent to convert to market rate be filed, work with potential purchasers to preserve the units, and ensure that tenants were properly notified of their rights under California law.

Responsible Agency: City of Santee Department of Development Services; U.S. Department of Housing and Urban Development (HUD); and San Diego County Housing Authority.

Financing: Section 8 vouchers, other funding sources as available

2013-2021 Objectives: Monitor the status of the 222 at-risk units at Cedar Creek Apartments, Forester Square Apartments, and Laurel Park Senior Apartments. The City of Santee will work with property owners, interest groups and the State and federal governments to implement the following programs on an ongoing basis to conserve its affordable housing stock:

- Monitor Units at Risk: Monitor the status of Cedar Creek Apartments, Forester Square Apartments, and Laurel Park Senior Apartments, since they may lose their subsidies due to discontinuation of the Section 8 program at the federal level or opting out by the property owner.
- Work with Potential Purchasers: Where feasible, provide technical assistance to public and non-profit agencies interested in purchasing and/or managing units at risk.
- Tenant Education: The California Legislature extended the noticing requirement of at-risk units opting out of low income use restrictions to one year. Should a property owner pursue conversion of the units to market rate, the City will ensure that tenants were properly noticed and informed of their rights and that they are eligible to receive Section 8 vouchers that would enable them to stay in their units.
- Assist Tenants of Existing Rent Restricted Units to Obtain Section 8 Voucher Assistance: Tenants of housing units with expired Section 8 contracts are eligible to receive special Section 8 vouchers that can be used only at the same property. The City will provide information to tenants of "at-risk" units to obtain these Section 8 vouchers through the San Diego County Housing

Authority and refer tenants to the fair housing service provider(s) for resources and assistance.

Timeframe: Ongoing implementation and annual monitoring and reporting throughout the planning period. Within 60 days of notice of intent to convert at-risk units to market rate rents, the City will work with potential purchasers using HCD's current list of Qualified Entities⁶, educate tenants of their rights, and assist tenants to obtain rental assistance in accordance with this program.

Program 4: Housing Choice Voucher Program

The Housing Choice Voucher Program extends rental subsidies to extremely low and very low income (up to 50 percent of AMI) families and seniors that spend more than 30 percent of their income on rent. The subsidy represents the difference between the excess of 30 percent of the monthly income and the actual rent. Rental assistance is provided to the recipients in the form of vouchers, which permit tenants to locate their own housing and rent units beyond the federally determined fair market rent in an area, provided the tenants pay the extra rent increment. Cities may contract with the San Diego County Housing Authority to administer the Housing Choice Voucher (HCV) Program. According to the Housing Authority, approximately 285 households received assistance through the program as of December 2019.

Responsible Agency: San Diego County Housing Authority
Financing: U.S. Department of Housing and Urban Development
2021-2029 Objectives: Continue to contract with the San Diego County Housing Authority to administer the Housing Choice Voucher (HCV) Program:

- Assist approximately 300 extremely low and very low income households annually during the planning period.
- Expand outreach and education on the recent State laws (SB 329 and SB 222) that support source of income protection for housing discrimination against low income households using public assistance (such as HCV) for rent payments.
- Promote the Housing Choice Vouchers program on City website, [focusing direct outreach to disadvantaged neighborhoods in the City through annual neighborhood meetings, beginning in 2022.](#)
- Support the County Housing Authority's applications for additional voucher allocations and efforts to maintain and expand voucher use in the City.

Timeframe: Ongoing implementation and annual monitoring throughout the planning period.

⁶ List of current Qualified Entities is maintained and updated by HCD and is subject to change. - <https://www.hcd.ca.gov/policy-research/preserving-existing-affordable-housing.shtml>.

2. ASSISTING IN THE DEVELOPMENT OF AFFORDABLE HOUSING OPPORTUNITIES AND SUPPORTIVE SERVICES

New construction is a major source of housing for prospective homeowners and renters but generally requires public sector support for the creation of units affordable to lower income households, including extremely low income households. While a wide range of for-sale and rental housing options are available in Santee to above moderate and moderate income households, affordable options for lower income households are more limited (**Section 2, Community Profile**). Where there is a need for affordable housing, often there is also a need for supportive services for lower income households, including extremely low income households. The following Objectives, Policies, and Programs intend to address the overall need for affordable housing and supportive services in Santee.

Objective 3.0: Expand affordable housing options within Santee.

Policy 3.1: Develop and maintain collaborative efforts among nonprofits, for-profit developers, and public agencies to encourage the development, maintenance, and improvement of affordable housing.

Policy 3.2: Implement the City's Climate Action Plan. Promote design concepts that utilize technological advances in the application of alternative energy sources which make the use of the natural climate to increase energy efficiency and reduce housing costs.

Policy 3.3: Encourage the provision of housing affordable to extremely low income households when reviewing proposals for new affordable housing developments.

Objective 4.0: Provide housing support services to address the needs of the City of Santee's lower and moderate income residents, including extremely low income households and those with special needs.

Policy 4.1: Continue to support and coordinate with social service providers and regional agencies to address the housing related needs of Santee residents, particularly those with special needs.

Policy 4.2: Coordinate with local social service providers to address the needs of the City's homeless population. Provide funding to groups providing shelter and other services to the homeless.

Policy 4.3: Continue to participate in the Countywide homeless working group in preparing and implementing recommendations to the Board of Supervisors, the appointed bodies and municipalities regarding plans for providing emergency housing, Low Barrier Navigation Centers (LBNC), and homes with supervised care.

Program 5: Homebuyer Assistance Programs

With limited funding and rising home prices, the ability of the City to provide homebuyer assistance is limited. However, Santee residents are eligible to participate in several City, County, and State programs

First-Time Homebuyer Program: Through this program, the City assists Santee first-time lower and moderate income homebuyers with down payment and closing cost assistance. This assistance functions similar to a “silent second” to the assisted household’s primary home loan application. This program is administered by the County of San Diego.

Down payment and Closing Cost Assistance Program (DCCA): DCCA offers low-interest deferred payment loans of up to 17 percent of the maximum allowable purchase price (adjusted annually) and a closing cost of four percent, not exceeding \$10,000. DCCA loan funds may be used to pay down payment and closing costs of a qualifying single-family home, condominium, townhouse, or manufactured home on a permanent foundation. This program is offered by the County Housing and Community Development Services (County HCDS) but administered by the San Diego Housing Commission (SDHC)

Mortgage Credit Certificate (MCC) Program: Mortgage Credit Certificates (MCCs) are certificates issued to lower and moderate income first-time homebuyers authorizing the household to take a credit against federal income taxes of up to 20 percent of the annual mortgage interest paid. This program is administered by the California Housing Finance Agency (CalHFA).

Homebuyer’s Down payment Assistance Program (CHDAP): CHDAP provides a deferred-payment junior loan, up to three percent of the purchase price, or appraised value, whichever is less, to be used for their down payment and/or closing costs. This program is administered by CalHFA.

Responsible Agency: City of Santee Department of Development Services, County HCDS, SDHC, CalHFA
Financing: HOME and other County and State funds
2021-2029 Objectives: Quantified objectives as follows:

- Assist 16 lower income households with downpayment and closing cost assistance during the planning period (four at <50 percent AMI and 12 at 51-80 percent AMI). Focus direct outreach to residents of disadvantaged neighborhoods to promote homeownership resources and opportunities in the City through annual neighborhood meetings, beginning in 2022.
- County HCDS has a goal of assisting approximately 120 households with DCCA. This goal covers the entire Urban County program.
- Refer residents to the County HCDS and the California Housing Finance Agency for assistance.

Timeframe: Annual flier circulation and monitoring and reporting throughout the planning period.

Program 6: Manufactured Home Fair Practices Program

The City regulates short-term space leases in mobile home parks and provides staff support to the Manufactured Fair Practices Commission, which holds biannual meetings. The program requires significant financial resources in administration and legal defense of the Ordinance. Through the City Attorney’s office, the City has defended or initiated many lawsuits to uphold the requirements of the Manufactured Home Rent Stabilization Program since 1998. To date, all of the City’s efforts to maintain the rent control system have been successful. The City will continue to attend the biannual Manufactured Fair Practices Commission and promote its services to residents.

- Responsible Agency:** City of Santee Department of Development Services
- Financing:** Mobilehome Park Assessment Fees
- 2021-2029 Objectives:** Assist approximately 1,200 mobile homeowners.
- Timeframe:** Ongoing implementation and annual monitoring and reporting throughout the planning period. Promote the services of the Manufactured Home Fair Practices Commission.

Program 7: Facilitate Affordable Housing Development

With limited funding, the City will rely on the following non-funding-related actions to encourage affordable housing production during the planning period:

- Collaborate with Affordable Housing Developers: Affordable housing developers work to develop, conserve and promote rental and ownership affordable housing. Particularly in relation to senior citizen housing, the affordable housing developer is often, but not always, a local organization interested in developing affordable housing. The City will annually contact and continue to collaborate with affordable housing developers to identify potential sites, write letters of support to help secure governmental and private-sector funding, and offer technical assistance related to the application of City incentive programs (e.g., density bonus).
- Regulatory Concessions and Incentives: The City will continue to work with developers on a case-by-case basis to provide regulatory concessions and incentives to assist them with the development of affordable and senior housing. In a relatively small city like Santee, this is the most effective method of assisting developers, as each individual project can be analyzed to determine which concessions and incentives would be the most beneficial to the project’s feasibility. Regulatory concessions and incentives may include, but are not limited to, density bonuses beyond State requirements, required parking reductions, fee reductions or deferral, expedited permit processing, and modified or waived development standards, and optional onsite-amenities when within ¼ mile from public park or trail.

- Responsible Agency:** City of Santee Department of Development Services
- Financing:** Department budget
- 2021-2029 Objectives:** To facilitate affordable housing development:
 - Annually update contact information and reach out to affordable housing developers for the purposes of soliciting their involvement in development projects in Santee.

- Participate with affordable housing developers to review available federal and State financing subsidies and apply as feasible on an annual basis.
- Review and revise the City’s Density Bonus Ordinance in 2021 to ensure consistency with State law.
- Achieve the development of 200 units affordable to lower and moderate income households (estimated based on 25 percent of the RHNA, and representing an improvement over the 150 affordable units achieved during the 2013-2021 Housing Element planning period).
- Pursuant to SB 1087, provide a copy of the adopted Housing Element to the City’s water and sewer service providers, emphasizing priority for services for affordable housing projects.

Timeframe: Update list and contact affordable housing developers annually. Provide ongoing participation and assistance to interested affordable housing developers. Annual monitoring and reporting throughout the planning period.

Program 8: Supportive Services

The City assists homeless and other service providers in meeting the immediate needs of persons with special needs, including the homeless or near-homeless in Santee. Immediate need includes the provision of food, temporary shelter, health care, and other social services.

Responsible Agency: City of Santee Department of Development Services
Financing: CDBG
2021-2029 Objectives: Assist 1,800 persons with temporary shelter and supportive services during the planning period (300 meals for lower income seniors, and temporary shelter, food, and clothing for 1,500 lower income individuals and families affected by domestic violence).
Timeframe: Annually review and allocate funds to service provider through the HUD Annual Plan process. Annual monitoring and reporting throughout the planning process.

3. PROVIDING ADEQUATE SITES TO ACHIEVE A VARIETY OF HOUSING TYPES AND DENSITIES

A key element in satisfying the housing needs of all segments of the community is the provision of adequate sites for housing of all types, sizes, and prices. This is an important function in both zoning and General Plan designations.

Objective 5.0 Encourage the provision of a wide range of housing by location, type of unit, and price to meet the existing and future needs of Santee residents to the maximum extent possible.

Policy 5.1: Provide a variety of residential development opportunities in the City, ranging in density from very low density estate homes to medium-high and high density development.

Policy 5.2: Encourage both the private and public sectors to produce or assist in the production of housing, with particular emphasis on housing affordable to lower income households, including extremely low income households, as well as housing suitable for the disabled, the elderly, large families, and female-headed households.

Policy 5.3: Require that housing constructed expressly for lower and moderate income households not be concentrated in any single area of Santee.

Policy 5.4: Encourage developments of new housing units designated for the elderly and disabled persons to be in close proximity to public transportation and community services.

Policy 5.5: Ensure that all new housing development and redevelopment in Santee is properly phased in amount and geographic location so that City services and facilities can accommodate that growth.

Policy 5.6: Ensure that sites in the Residential Sites Inventory are available during the planning period by overriding the Gillespie Field ALUCP as appropriate.

Program 9: Inventory of Available Sites and Monitoring No Net Loss

Santee has been allocated a RHNA of 1,219 units for the 2021-2029 planning period (406 very low income, 200 low income, 188 moderate income, and 425 above moderate income units). With units entitled and under review, as well as anticipated ADUs, the City has adequate capacity for its moderate and above moderate income RHNA, with a remaining lower income RHNA of 605 units. Vacant and underutilized sites with zoning allowing up to 30 units per acre can accommodate 113 lower income units, with a shortfall of 492 lower income units. To accommodate the City's remaining shortfall RHNA for 492 lower income units, to maintain adequate sites for all income groups throughout the eight-year planning period, and to foster additional residential growth in the City, the City will rezone up to 161 acres (25 parcels) within 18 months of the adoption of the Housing Element. Specifically, a new R-30 zone will be created, allowing a density range of 30 to 36 du/ac). As part of this rezoning, a minimum of 25 acres will be rezoned to permit multi-family by right (without discretionary action) and sufficient to accommodate the shortfall of 492 units for lower income households. The rezoned sites will meet the requirements of Government Code 65583.2, including but not limited to a minimum

density of 20 units per acre, minimum site size to permit at least 16 units on site, and zoned to allow ownership and rental housing by right in which at least 20 percent of the units are affordable to lower income households.

Table 41: Rezoning for RHNA			
Current Zone	Proposed Zone	Acreage	Parcels
POS/IL	POS/R-7	47.45	1
R-1	R-7	6.81	5
R-1A	R-7	13.93	5
R-2	R-7	2.05	2
TC-C	TC-R-14	8.61	1
TC-R-22	TC-R-14	14.06	2
TC-R-30	TC-R-14	22.15	1
IL	R-14	2.93	1
CG	R-22	3.25	1
R-2	R-22	4.80	1
R-7/GC	R-22	1.30	1
TC-O/I	TC-R-22	7.75	1
TC-C	TC-R-22	5.26	1
TC-C	TC-R-30	11.11	1
TC-O/I	TC-R-30	10.00	1
Total		161.46	25

To ensure that the City monitors its compliance with SB 166 (No Net Loss), the City will monitor the consumption of residential acreage to ensure an adequate inventory is available to meet the City’s RHNA obligations. To ensure sufficient residential capacity is maintained to accommodate the RHNA, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower income households, the City will identify and if necessary rezone sufficient sites to accommodate the shortfall and ensure “no net loss” in capacity to accommodate the RHNA.

The City will maintain an inventory of available sites for residential development and provide it to prospective residential developers upon request. The parcel-by-parcel inventory located in **Appendix C, Sites Inventory**, of this Housing Element.

Responsible Agency: City of Santee Department of Development Services
Financing: Department budget
2021-2029 Objectives: Maintain an inventory of the available sites for residential development and provide it to prospective residential developers. Specifically, promote opportunities for new housing to affordable housing developers (including those for special needs housing). Starting in 2023 upon completing of rezoning efforts, conduct annual e-mail blast and follow-up meetings with developers.

Timeframe: Rezone identified parcels within one year of the Housing Element Adoption; Continue to implement a formal evaluation procedure pursuant to Government Code Section 65863 to monitor the development of vacant and nonvacant sites in the sites inventory and ensure that adequate sites are available to meet the remaining RHNA by income category; Ongoing implementation and annual monitoring and reporting throughout the planning period.

Program 10: By-Right Approval of Projects with 20 Percent Affordable Units on “Reuse” Sites

Pursuant to AB 1397 passed in 2017, the City will amend the Zoning Ordinance to provide by-right approval of housing development in which the project proponent voluntarily includes 20 percent of the units as housing affordable to lower income households, on sites being used to meet the Sixth Cycle RHNA that represent “reuse sites” from previous Housing Element cycles, as well as the rezoned sites required for the 492-unit shortfall in lower income RHNA. Explore by-right approval for any project providing more than 20 percent of units affordable to lower income households. The “reuse” sites are specifically identified in the inventory (see **Appendix C**).

Responsible Agency: City of Santee Department of Development Services
Financing: Department budget
2021-2029 Objectives: Comply with AB 1397 to further incentivize development of housing on sites that have been available over one or more planning periods.
Timeframe: Update the Zoning Ordinance within one year of Housing Element adoption

Program 11: Replacement Housing

Development on nonvacant sites with existing residential units is subject to replacement requirement, pursuant to AB 1397. The City will amend the Zoning Code to require the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in State Density Bonus Law.

Responsible Agency: City of Santee Department of Development Services
Financing: Department budget
2021-2029 Objectives: Comply with AB 1397 on replacement requirements.
Timeframe: Update the Zoning Ordinance within one year of Housing Element certification by HCD.

Program 12: Accessory Dwelling Units (ADUs)

ADU is an important alternative option for affordable housing. To facilitate ADU development, the City Council approved to waive development impact fees for ADUs for five years effective September 2019. Before the five-year period ends, the City will explore whether the fee waiver needs to be extended in exchange for affordable housing.

The City will also explore other options to further encourage the construction of ADUs in the community. Options to explore may include increased outreach and education, technical/resources guides online, pre-approved plans, larger unit square footage allowances and reduced setback and lot coverage standards in exchange for deed restrictions, among others.

Responsible Agency: City of Santee Department of Development Services
Financing: Department budget
2021-2029 Objectives: Facilitate the development of 80 ADUs.
Timeframe: Explore other tools to facilitate ADU construction in 2022 and evaluate potential extension of fee waivers in 2024. Explore the potential for fee waivers in exchange for deed restrictions for affordability by the end of 2024.

4. REMOVING GOVERNMENTAL CONSTRAINTS AS APPLICABLE

State law requires that housing elements address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing.

Objective 6.0: Reduce or remove government constraints to housing production and opportunity where feasible and legally permissible.

Policy 6.1: Promote efficient and creative alternatives to help reduce government constraints.

Policy 6.2: Provide incentives and regulatory concessions for affordable and special needs housing through implementation of the density bonus ordinance and other mechanisms.

Policy 6.3: Facilitate timely building permit and development plan processing for residential construction.

Policy 6.4: Balance the need to protect and preserve the natural environment with the need to provide additional housing and employment opportunities.

Policy 6.5: Approve residential uses if they meet use requirements, development criteria and design requirements of the General Plan and Municipal Code.

Program 13: Monitor Changes in Federal and State Housing, Planning, and Zoning Laws

State law requires that Housing Elements address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing. The City will also continue to monitor federal and State legislation that could impact housing and comment on, support, or oppose proposed changes or additions to existing legislation, as well as support new legislation when appropriate. The City will also continue to participate in the SANDAG Technical Working Group and Regional Housing Working Group, which monitor State and Federal planning, zoning, and housing legislation. Special attention will be given by the City in the minimizing of governmental constraints to the development, improvement, and maintenance of housing.

The 2021-2029 Housing Element update identified the following governmental constraints to the development or maintenance of housing in Santee, and the City will continue to monitor its development process and zoning regulations to identify and remove constraints to the development of housing.

Emergency Shelters (AB 139, 2019):

- Establish parking requirements based on staffing level only.

Low Barrier Navigation Center (AB 101, 2019):

- Establish provisions for Low Barrier Navigation Centers (LBNC) as development by right in areas zoned for nonresidential zones (including mixed use zones as required by law) permitting multifamily uses if it meets specified requirements. A “Low Barrier Navigation Center” is defined as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.”

Supportive Housing (AB 2162, 2019/AB 2988, 2020):

- Establish provisions for supportive housing. Projects of up to 120 units be permitted by right in zones where multi-family and mixed-use developments are permitted, when the development meets certain conditions, such as providing a specified amount of floor area for supportive services. The City may choose to allow projects larger than 120 units by right, as well. The bills also prohibit minimum parking requirements for supportive housing within 1/2 mile of a public transit stop.

Affordable Housing Streamlined Approval (SB 35)

- Establish a streamlined, ministerial review process for qualifying multifamily residential projects.

Group Homes for Seven or More Persons

- The City currently does not permit group homes for seven or more persons in all residential zones. Initiate and complete a process in 2022 to review the provision for group homes for seven or more persons and amend the Zoning Ordinance as appropriate to allow group homes for seven or more in all residential zones to mitigate the potential constraints on housing for persons with disabilities.

Responsible Agency: City of Santee Department of Development Services
Financing: Department budget
2013-2021 Objectives: Monitor State and federal legislation as well as City development process and zoning regulations to identify and remove housing constraints.
Timeframe: Within one year of Housing Element adoption; Annual monitoring and reporting throughout the planning period.

5. AFFIRMATIVELY FURTHERING FAIR HOUSING

To make adequate provision for the housing needs of all economic segments of the community, the housing program must include actions that promote housing opportunities for all persons regardless of their special characteristics as protected under State and Federal fair housing laws.

Objective 7.0 Promote equal opportunity for all residents to reside in the housing of their choice.

Policy 7.1: Prohibit discrimination in the sale or rental of housing with regard to characteristics protected under State and Federal fair housing laws.

Policy 7.2: Encourage the development of residential units that are accessible to disabled persons or are adaptable for conversion to residential use by disabled persons.

Policy 7.3: Reasonably accommodate persons with disabilities who seek waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the Zoning Ordinance.

Policy 7.4: Accommodate emergency shelters, low barrier navigation center, transitional housing, supportive housing, residential care facilities, and community care facilities in compliance with State laws and City Zoning Ordinance.

Policy 7.5: Collaborate with jurisdictions to explore the merit of a multi-jurisdictional agreement for the provision of emergency shelters.

Policy 7.6: Continue active support and participation with the fair housing service provider to further spatial de-concentration and fair housing opportunities.

Program 14: Affirmatively Furthering Fair Housing

The City of Santee supports fair housing laws and statutes. The City participated in a regional assessment of impediments to fair housing choice in 2020. The City will also work with the fair housing service provider to address the disproportionate housing needs and impediments to fair housing, including expanded testing efforts. The City will continue to participate in the San Diego Regional Alliance for Fair Housing (SDRAFFH) and take actions to fair housing impediments. The City attends monthly SDRAFFH meetings with the other 17 cities, the County, and fair housing service providers, to address fair housing issues. The City distributes information on fair housing and refers fair housing questions and housing discrimination claims to its fair housing service provider. The City contracts with the Center for Social Advocacy (CSA) to provide fair housing services. The City will continue to contract with CSA to provide fair housing services to 500 residents of Santee over the 2021-2029 planning period. As part of its contract with the City, CSA will:

- Advocate for fair housing issues
- Conduct outreach and education
- Provide technical assistance and training for property owners and managers
- Coordinate fair housing efforts
- Assist to enforce fair housing rights

- Collaborate with other fair housing agencies
- Refer and inform for non-fair housing problems
- Counsel and educate tenants and landlords

Responsible Agency: City of Santee Department of Development Services; fair housing service provider

Financing: CDBG; Departmental Budgets; SB funds

2021-2029 Objectives: To affirmatively further fair housing, the City will undertake a series of actions as outlined in [Table 42](#) below.

Time Frame: See [Table 42](#) below.

Table 42: Fair Housing Issues, Contributing Factors, and Meaningful Actions

Fair Housing Issue	Contributing Factors and Priority	Meaningful Action
<p><u>Fair Housing Outreach and Enforcement</u></p> <p><u>Housing Mobility</u></p> <p>Insufficient fair housing testing and limited outreach capacity</p>	<ul style="list-style-type: none"> • Lack of monitoring • Lack of a variety of media inputs • Lack of marketing community meetings • Lack of monitoring 	<ul style="list-style-type: none"> • Participate in regional efforts to address fair housing issues and monitor emerging trends/issues in the housing market. Attend quarterly SDRAFFH coordinating meetings. • Continue to contract with a fair housing service provider to provide fair housing services to 500 residents of Santee over the 2021-2029 planning period. As part of its scope of work, require annual fair housing workshops to be conducted in Santee. Increase outreach for participation to the southern part of the City identified with disproportionate housing needs and displacement risks. • Include fair housing testing from fair housing provider as part of scope every two years starting in 2022. Specifically, upon release of the 2020 Census data, conduct random testing that reflects the City’s changing demographics, if any. • Develop interest list for updates on fair housing and affordable housing projects lists by 2022. On an ongoing basis, contact interest list with updates. • Semi-annually, the City will update its City website with the affordable housing projects. • By 2022, expand outreach and education of the State’s new Source of Income Protection (SB 329 and

Table 42: Fair Housing Issues, Contributing Factors, and Meaningful Actions

Fair Housing Issue	Contributing Factors and Priority	Meaningful Action
		<p>SB 222), defining public assistance including HCVs as legitimate source of income for housing. Increased outreach and education to the southern census tracts with disproportionate needs.</p> <ul style="list-style-type: none"> Utilize non-traditional media (i.e. social media, City website) in outreach and education efforts, in addition to print media and notices. Increase outreach to the southern census tracts. <u>Annually promote fair housing awareness during the Fair Housing Month (April).</u> <u>Annually,</u> require evidence of effective outreach from Fair Housing Provider. City will require attendance reports to events from fair housing providers. Based on reports, work with fair housing provider on plan to increase attendance to outreach events. In 2021-2022, pursue a HUD Section 108 loan in the amount of \$1.24 million to implement the Active Santee Plan and ADA Transition Plan. By 2023, develop incentives or mechanisms to facilitate the development of a variety of housing types, including live/work housing and large units appropriate for large households.
<p><u>Place-Based Strategy for Community Improvements</u></p> <p><u>Housing Mobility</u></p> <p>Concentration of protected persons (persons with disabilities, LMI households, children in families or single female-headed households) in lower resource (moderate) areas.</p>	<ul style="list-style-type: none"> Location and type of affordable housing- HCV use concentrated Land use - Mobile home park land use, usually occupied by senior residents Proximity to shopping centers and transit 	<ul style="list-style-type: none"> As part of Santee Active Plan (January 2021), identified wheelchair accessible areas and prioritization of them <u>for improvements</u>. Leverage this plan to prioritize improvements in the southern census tracts of City. <p>The City is working on ADA Transition Plan <u>that builds on the adopted Active Santee Plan</u> to identify deficiencies in City and allocate resources in the operating budget. The AFFH analysis of needs will inform the annual budgetary process to prioritize <u>CDBG and General City</u> funds for improvements in southern portions of City.</p>

Table 42: Fair Housing Issues, Contributing Factors, and Meaningful Actions

Fair Housing Issue	Contributing Factors and Priority	Meaningful Action
		<ul style="list-style-type: none"> • <u>As part of the Safety Element Update (targeted for adoption by January 2022), existing conditions for Environmental Justice (EJ) have been drafted. The report identifies the southwestern portion of the City based on disadvantaged communities mapping. Annually, coordinate with Public Works to prioritize these EJ areas for actions and improvements. <u>According to the CIP, planned improvements include:</u></u> - <u>Prospect Ave./Mesa Rd. intersection improvements</u> - <u>Replace induction streetlights along Prospect Ave. with LED lights</u> - <u>Provide stormwater capture devices</u> - <u>Fill gaps in sidewalks</u> - <u>Improve sidewalks with pedestrian ramps where needed.</u> <ul style="list-style-type: none"> • Promote key lower income housing opportunity sites for affordable housing development, particularly site 16A (Town Center), as a means to bring new housing opportunities in high resource areas. Provide technical assistance to <u>housing developers on how to</u> utilize the City's incentives and concessions for affordable housing. • Support funding applications by nonprofit developers for affordable housing in high resource areas.
<p><u>Anti-Displacement</u></p> <p>Displacement risk in areas with disproportionate housing needs with special needs populations</p>	<ul style="list-style-type: none"> • Land use - Mobile home park land use, usually occupied by senior residents • Displacement risk due to economic pressures • Increasing rents • HCV use concentration 	<ul style="list-style-type: none"> • Continue to implement the <u>Mobile Home Assistance Program and Conversion Regulations</u> (Program 1) • Continue to implement the <u>Mobilehome Park Fair Practices Commission Ordinance</u> (Rent Control Ordinance, <u>Chapter 2.44 of Santee Municipal Code</u>) (Program 6) • HCV use outreach (as part of fair housing outreach plan).

Table 42: Fair Housing Issues, Contributing Factors, and Meaningful Actions

Fair Housing Issue	Contributing Factors and Priority	Meaningful Action
		<ul style="list-style-type: none"> As part of the project application review, require applicant to provide advance noticing to existing tenants. <u>By 2023</u> create a registry for “first-right of refusal” for displaced lower income tenants to return if affordable housing is created in the new project. Focus fair housing outreach and education on areas with high displacement risk <u>with further enhancement of the City’s website</u> (southern census tracts, especially the tract identified as a sensitive community in <u>Figure E-25</u> and tracts identified as disadvantaged communities in <u>Figure E-26</u>).

Appendix E: Affirmatively Furthering Fair Housing

A. Introduction and Overview of AB 686

AB 686 passed in 2017 requires the inclusion in the Housing Element an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions to affirmatively further fair housing. The Bill added an assessment of fair housing to the Housing Element which includes the following components: a summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities, an assessment of contributing factors, and an identification of fair housing goals and actions.

1. SUMMARY OF FAIR HOUSING ISSUES

2020 San Diego Regional Analysis of Impediments to Fair Housing

The City of Santee participated in the 2020 San Diego Regional Analysis of Impediments to Fair Housing (2020 Regional AI). The 2020 Regional AI concluded that the following were impediments to Fair Housing Choice in the San Diego Area (regional impediments shown in **bold**). The local relevance of these impediments to Santee is included below:

Regional Impediment #1: Enforcement activities are limited. Fair housing services focus primarily on outreach and education; less emphasis is placed on enforcement. Fair housing testing should be conducted regularly.

Local Relevance: Center for Social Advocacy (CSA) San Diego provides fair housing services to the City of Santee. CSA conducts regular workshops and educational presentations, including informal Fair Housing workshops. Workshops and presentations cover a wide range of issues including tenant and landlord rights and responsibilities, notices to vacate, substandard conditions, and foreclosures. Fair housing testing records for only FY 2020 were provided by CSA in the 2020 Regional AI. CSA tested for discrimination based on national origin and race at two sites in Santee. The site tested for race showed differential treatment. More testing is needed. Like the County, the City needs to place more emphasis on enforcement activities. The City has included an increase in testing efforts in Program 13.

Regional Impediment #2: Fair housing outreach and education should expand to many media forms, not limited to traditional newspaper noticing or other print forms. Increasingly fewer people rely on the newspapers to receive information. Public notices and printed flyers are costly and ineffective means to reach the community at large.

Local Relevance: Like the regional practices, the City also mainly uses traditional print forms as fair housing outreach. The City will share fair housing information and resources online and continue to maintain the links on the City website providing information about fair housing services. In addition, the City will consider this impediment as it expands outreach and education of the State's new Source

of Income Protection (SB 329 and SB 222), defining public assistance including HCVs as legitimate source of income for housing (Program 13).

Regional Impediment #3: Patterns of racial and ethnic concentration are present within particular areas of the San Diego region. In San Diego County, 15.4 percent of residents indicated they spoke English “less than very well” and can be considered linguistically isolated.

Local Relevance: Linguistic isolation is not as extensive in Santee than the County. Only 4.1 percent of the population indicated “speaking English less than very well.” In addition, the 2021 TCAC/HCD Opportunity and HUD’s racially/ethnically-concentrated areas of poverty (RECAPs) maps did not identify any areas of high poverty and segregation in Santee. However, the southern tracts of the City have been identified as disadvantaged communities using the OPR’s screening methodology for the Environmental Justice Element. These areas also have a concentration of persons with disabilities, low and moderate income households, children in family and single-female households.

Regional Impediment #4: Housing choices for special needs groups, especially persons with disabilities, are limited. Housing options for special needs groups, especially for seniors and persons with disabilities, are limited. Affordable programs and public housing projects have long waiting lists.

Local Relevance: Elderly households make up 25 percent of the City’s households and 10 percent of the City’s population has a disability. The 2020 Regional AI found governmental constraints that hinder housing choice for special needs groups, particularly non-compliance with state law related to accessory dwelling units, Low Barrier Navigation Centers (LBNC), emergency shelter capacity, parking standards, transitional and supportive housing, and affordable housing streamlined approval. Details of the constraints are found in Governmental Constraints section of the Housing Element. The City will address these constraints through Programs 10 and 11.

Regional Impediment #5: Due to the geographic disparity in terms of rents, concentrations of Housing Choice Voucher (HCV) use have occurred, with a high rate of voucher use in El Cajon and National City.

Local Relevance: Though the City received 0.8 percent (266 vouchers) of the HCVs administered by the County, HCV use is concentrated in the southern tracts of the City. Assisting in the promotion of HCV use is included in Program 13.

Regional Impediment #6: Hispanics and Blacks continue to be under-represented in the homebuyer market and experienced large disparities in loan approval rates.

Local Relevance: Blacks were not significantly under-represented in the homebuyer market in Santee. Variation between percent of applicant pool (1.4 percent) and percent of the City’s population (1.8 percent) was not significant. Blacks also received the same approval rates as the approval rate for all Citywide applications (64 percent). However, Hispanics were greatly under-represented in Santee’s homebuyer market, making up only 9.9 percent of the City’s applicant pool but 16.3 percent of the City’s population. Hispanics were approved at lower rates of any race/ethnic (59 percent) except for Asian and multi-race applicants (58 percent).

Other Local Fair Housing Issues

The fair housing assessment below spatially describes concentrations of fair housing components (e.g., fair housing enforcement and outreach, integration and segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs including displacement risk). This assessment found that the southernmost census tracts in the downtown, especially south of the intersection of Mission Gorge Rd and Cuyamaca St, have the most fair housing issues. These census tracts had a concentration of: persons with disabilities, low and moderate income households, low economic scores (based on poverty, adult education, job proximity, and median home value), mobile homes, and housing choice voucher use. According to staff, these areas are heavily populated by senior populations, particularly residing in the mobile home parks.

B. Assessment of Fair Housing Issues

1. FAIR HOUSING ENFORCEMENT AND OUTREACH

San Diego County jurisdictions are served by two fair housing service providers, CSA San Diego and Legal Aid Society of San Diego (LASSD), that investigate and resolve discrimination complaints, conduct discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. These service providers also provide landlord/tenant counseling, which is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection regulations, as well as mediating disputes between tenants and landlords.

The City of Santee contracts with CSA San Diego County to provide fair housing services. Between FY 2014 and FY 2019, CSA provided fair housing services to approximately 1,000 San Diego County residents per year—for a total of 6,276 clients over the five-year period. The majority of CSA’s clients during this period came from El Cajon (35 percent), Chula Vista (21 percent), and the unincorporated County. CSA served 276 Santee residents during this period, representing only four percent of the clients served by CSA. Statistics reported by CSA indicate that low income persons, regardless of race, are the most frequently impacted by fair housing issues in its service area ([Table E-1](#)). The vast majority of CSA’s clients (95 percent) between FY 2014 and FY 2019 were either extremely low or very low income. Consistent with the demographic makeup of the region, White residents represented a substantial proportion of clients served (41 percent). However, there is some indication that fair housing issues disproportionately affect certain racial/ethnic groups. For example, Black residents made up less than an average 4.1 percent of the population in the cities that CSA serves but represented 10 percent of fair housing clients served. The characteristics of the clients served by CSA are similar to those in the County, except that the proportion of non-Hispanic and White clients was higher in Santee than the County. This is to be expected as Santee has a higher proportion of non-Hispanic White population (69 percent) than the County (46 percent).

Table E-1: Characteristics of Clients Served by CSA and Santee Population (2013-2019)

Santee	CSA County Clients	CSA Santee Clients	Santee Population
Total Clients Served/ <i>Population</i>	6,276	276	57,999
Race			
Hispanic	38.1%	11.2%	18.1%
Non- Hispanic	61.9%	88.4%	81.9%
Ethnicity			
White	40.5%	70.7%	69.1%
Black/African American	10.0%	4.7%	1.9%
Asian	2.6%	1.8%	5.2%
Hawaiian/Pacific Islander	2.4%	0.7%	0.3%
American Indian/ Alaska Native	2.6%	0.4%	0.5%
Other/Multi-Racial	41.9%	21.7%	5%
Income Level			
Extremely Low Income (<30% AMI)	82.9%	76.1%	9.1%
Very Low Income (<50% AMI)	12.3%	10.9%	10.0%
Low Income (<80% AMI)	2.6%	10.5%	18.8%
>80% AMI or income not reported	2.2%	2.5%	62.1%
Source: 2020 San Diego Regional AI, CSA San Diego 2020.			

For the 2020 Regional AI ,CSA also provided the results of Fair Housing Testing done on at two sites in Santee in 2020. CSA tested for discrimination based on national origin and race at two sites. The site tested for race showed differential treatment. Most of the testing done by CSA focused on the City of San Diego (20 sites) and El Cajon (eight sites). **More testing for discrimination in the City of Santee is needed.**

The U.S. Department of Housing and Urban Development (HUD) maintains a record of all housing discrimination complaints filed in local jurisdictions. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. From October 1, 2014 to September 30, 2019, nine fair housing cases filed with HUD from Santee residents, comprising only two percent of the complaints filed in the entire County. Overall, disability and race discrimination were the most commonly reported—reported in four cases. In the County and Santee, disability-related discrimination was the most commonly reported—comprising 53 percent of all cases in the County and 67 percent of Santee cases.

CSA conducts regular workshops and educational presentations, including informal Fair Housing workshops. Workshops and presentations cover a wide range of issues including tenant and landlord rights and responsibilities, notices to vacate, substandard conditions, and foreclosures. From 2015 to 2019, CSA participated in at least 26 outreach events at Santee City Hall and Santee Public Library, located on the north and south ends of the City, respectively. These two locations are accessible through public transit (Metropolitan Transit System Routes 834 and 832). Events were advertised on the City website and in the City’s paper newsletter available in English and Spanish. Meetings are usually held during the day. CSA is also a member of the City’s Santee Collaborative, a community-based organization of parents, residents, community-based organizations, school personnel and the

faith community that works to “promote a healthier more proactive community that builds resilient children and families.” Fair housing testing was limited.

The 2020 Regional AI found that enforcement and outreach services were inadequate across the San Diego County Region as residents may find it hard to navigate the service system and identify the appropriate agency to contact. The City of Santee advertises fair housing services through placement of a fair housing services brochures and posters at public counters. These materials are available in English, Spanish, and Arabic. **The City will continue to include a link to the CSA website and update outreach materials frequently.**

2. INTEGRATION AND SEGREGATION

Race/Ethnicity

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility.

As described in the Community Profile, Santee’s population is mostly white. Despite increases in the minority population from 2010 to 2018, Santee continues to have a substantially larger proportion of White residents and smaller proportion of Hispanic/Latino residents compared to neighboring jurisdictions and the County as a whole (Figure 1 and [Table E-2](#)). The City’s proportion of Black/African American residents is also significantly lower than surrounding cities and within the County.

Figure E-1: Race/Ethnic Composition Changes

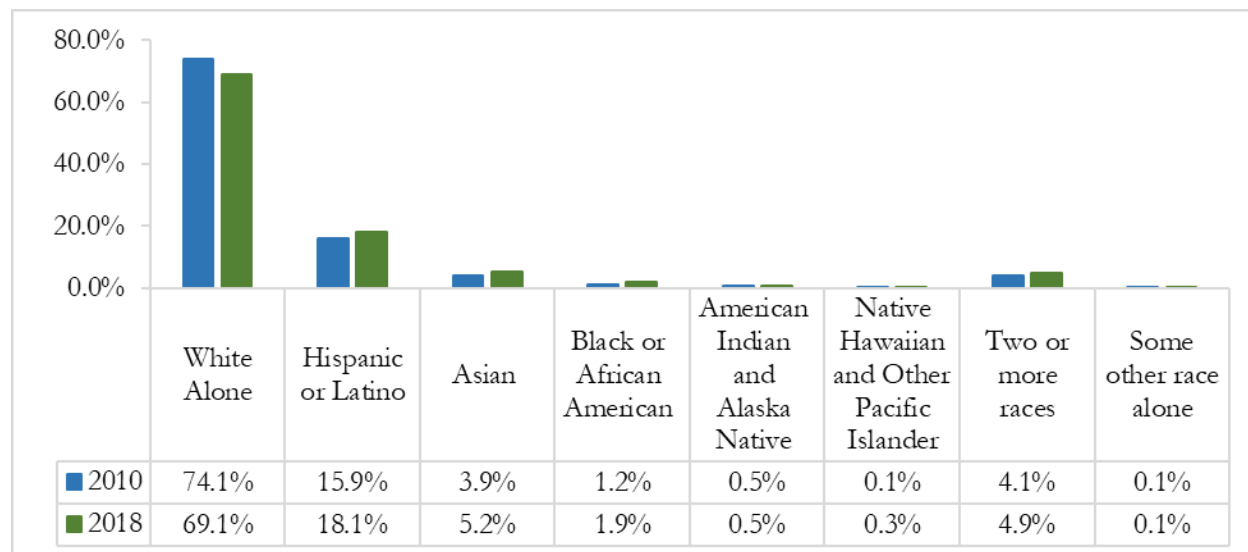


Table E-2: Racial Composition in Neighboring Cities and Region (2018)

Jurisdiction	White Alone	Black	American Indian/Alaskan	Asian	Hawaiian/Pac Islands	Other	Two or More	Hispanic/Latino
El Cajon	57.1%	5.5%	0.2%	3.7%	0.4%	0.3%	4.3%	28.5%
La Mesa	55.5%	7.1%	0.1%	6.5%	0.3%	0.1%	4.6%	25.9%
Lemon Grove	28.9%	13.5%	0.1%	6.0%	0.4%	0.1%	4.2%	46.7%
San Diego	42.9%	6.2%	0.2%	16.4%	0.4%	0.2%	3.6%	30.1%
Santee	69.1%	1.9%	0.5%	5.2%	0.3%	0.1%	4.9%	18.1%
County	45.9%	4.7%	0.4%	11.6%	0.4%	0.2%	3.4%	33.5%

Source: American Community Survey (2014-2018 Estimates).

Dissimilarity indices can be used to measure the extent to which a distribution of any two groups differs across block groups. Racial and ethnic dissimilarity trends for Santee and San Diego-Carlsbad Region are shown in [Table E-3](#). The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

From 1990 to 2020, block groups in Santee have become increasingly segregated. While the segregation between non-white and white residents remained low, the segregation between white and Black population and white population and Asian/Pacific Islanders has increased in the past 30 years. Specifically, in the past 10 years, the segregation between white population and black population and white population and Asian/Pacific Islander populations increased by 10 index points. Overall, Santee shows a lower degree of segregation where scores are less than 40 and considered “low segregation” in comparison to the San Diego-Carlsbad Region as a whole. County dissimilarity indices for Non-White/White, Black/White, Hispanic/White, and Asian or Pacific Islander/White were all categorized as moderately segregation.

Table E-3: Dissimilarity Indices

	1990 Trend	2000 Trend	2010 Trend	Current
Santee				
Non-White/White	10.53	7.99	6.85	9.68
Black/White	15.73	28.26	20.67	31.94
Hispanic/White	13.21	6.39	6.37	9.02
Asian or Pacific Islander/White	5.98	11.01	6.89	15.16
San Diego County				
Non-White/White	43.4	45.2	42.9	46.4
Black/White	58.0	53.8	48.4	54.1
Hispanic/White	45.2	50.6	49.6	51.7
Asian or Pacific Islander/White	48.1	46.8	44.4	49.8

Source: HUD Dissimilarity Index, 2020.

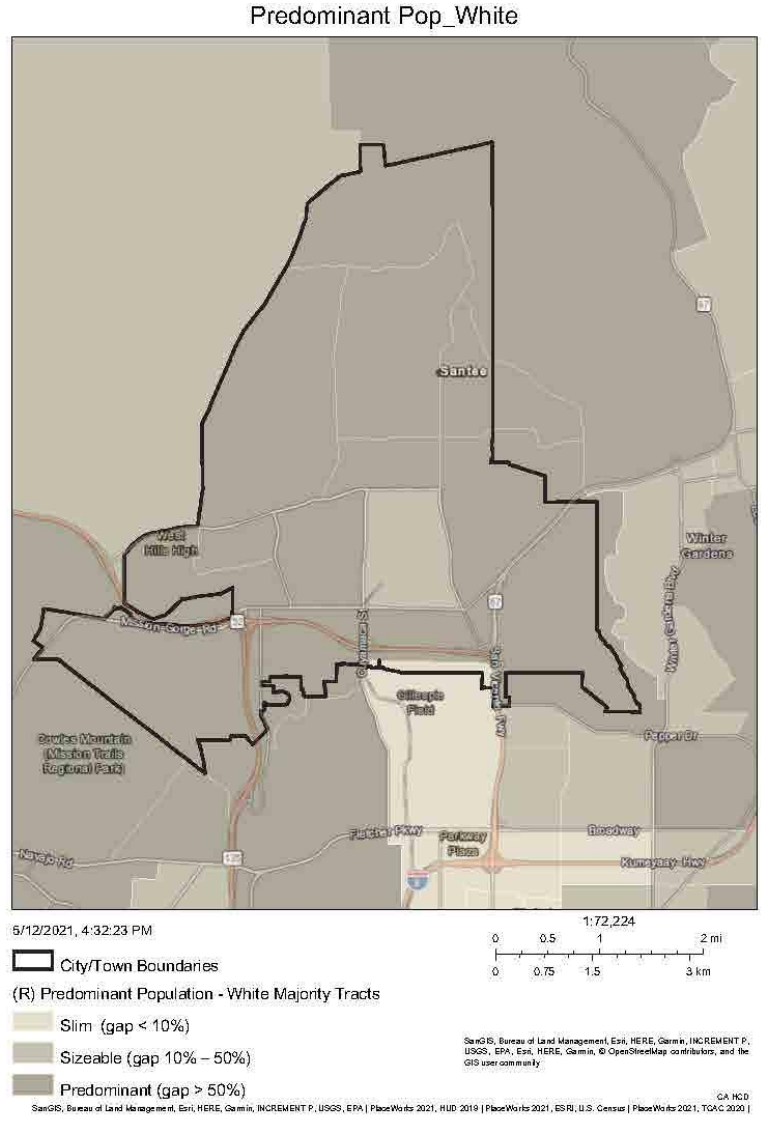
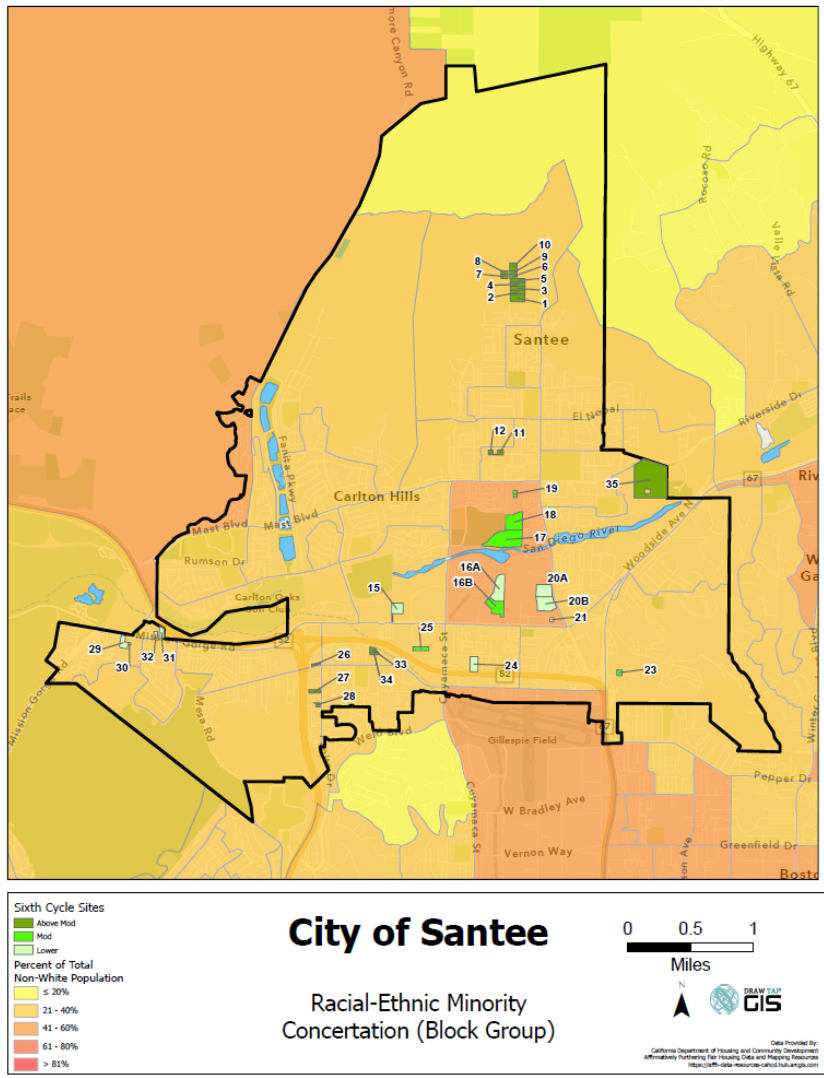
The AFFH tool also provides spatial analysis of non-white population (i.e., minority and mixed-race population) across the City. [Figure E-2](#) shows that the highest concentration of non-white population is found in block group 060730166.151, located in the south of the City (north of Mission Gorge Rd and bounded by Cuyamaca St. and N. Magnolia Ave.

Most of the City’s block groups have a minority population between 21 and 40 percent ([Figure E-2](#)). The City identified 36 percent of its RHNA units in block groups with a 21-40 percent minority concentration, and a similar proportion (34 percent) of its lower income in these census tracts. [Table E-4](#) shows that most RHNA units are distributed in the census tract with the highest minority concentration (41-60 percent). This census tract has 64 percent of all RHNA sites, but a variety of income levels. In fact, 90 percent of moderate income RHNA sites are in this tract. [Figure E-2](#) also shows that the City’s RHNA sites are fairly distributed throughout the City.

Table E-4: RHNA Unit Distribution by % Minority Concentration				
% Minority Concentration	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 20%	0.0%	0.0%	0.0%	0.0%
21 - 40%	33.6%	9.9%	100.0%	36.3%
41 - 60%	66.4%	90.1%	0.0%	63.7%
61 - 80%	0.0%	0.0%	0.0%	0.0%
> 81%	0.0%	0.0%	0.0%	0.0%
Total	1,228	587	295	2,110

AFFH mapping tool also provides maps of predominant races by tract. These metrics show tracts where a race dominates and the percent by which the race dominates over the other races. [Figure E-2](#) also shows most of the census tracts in the City are predominantly white, meaning the gap between white population and other ethnicities is over 50 percent.

Figure E-2: Minority Concentration and Predominantly White Areas



Persons with Disabilities

According to the 2020 Regional AI, housing choices for special needs groups, especially persons with disabilities, are limited in the region. In San Diego County, about 10 percent of the population has a disability. Santee has a population of persons with disabilities (11.2 percent) comparable to the County and its neighboring cities of El Cajon (13.3 percent), La Mesa (11.9 percent), and Poway (10.0 percent).

Figure E-3 shows that persons with disabilities are concentrated on census tracts to the east of Santee, with the population with a disability ranging between 10 and 20 percent per tract. Within Santee, tracts along the north, east, and south edges of the City have the highest concentration of persons with disabilities.⁸ Persons with disabilities may be concentrated along the southern census tracts of the cities because all of the City’s mobile home parks are located in these tracts as well (Figure E-4). A special characteristics of the southernmost tracts in the City is that all of the City’s mobile home parks are located in the southernmost tracts if the City. Half of the City’s mobile home parks are in tracts where 10 to 20 percent of the population has a disability. Mobile home parks are often occupied by seniors on fixed incomes, who may also have a disability.

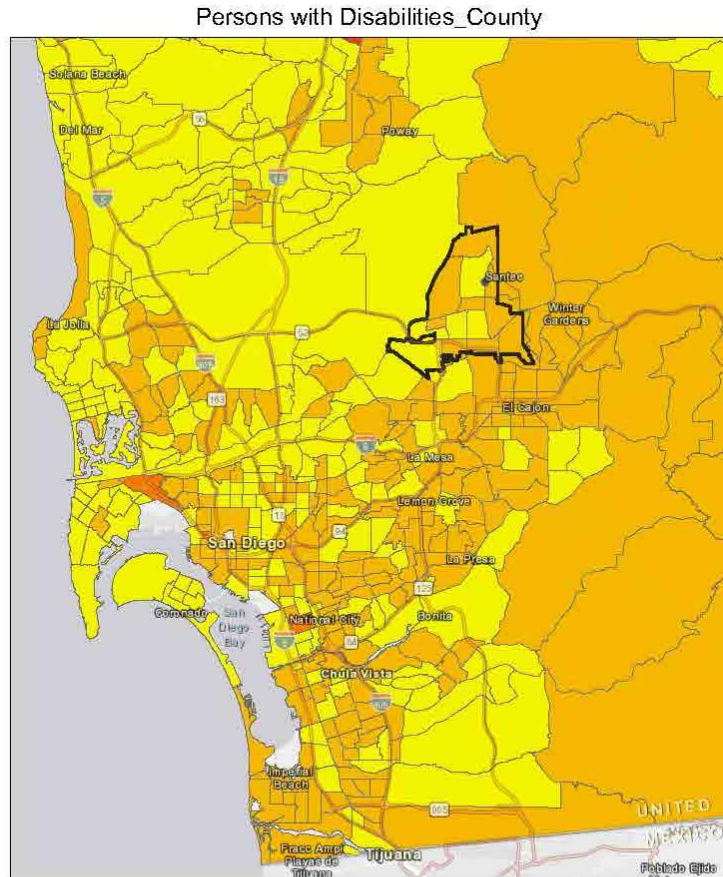
Santee’s RHNA units are not disproportionately concentrated on areas with a concentration of persons with disabilities. About 80 percent of Santee’s RHNA units are located in census tracts with a population of less than 10 percent persons with disabilities (Table E-5). Only moderate and above moderate units are located in census tracts with a population of persons with disabilities between 10 and 20 percent (Figure E-3).

Table E-5: RHNA Units by % Population with Disabilities

% Persons with Disabilities	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 10%	91.4%	90.1%	6.8%	79.2%
10% - 20%	8.6%	9.9%	93.2%	20.8%
20% - 30%	0.0%	0.0%	0.0%	0.0%
30% - 40%	0.0%	0.0%	0.0%	0.0%
> 40%	0.0%	0.0%	0.0%	0.0%
Total Units	1,228	587	295	2,110

⁸ The northernmost tract in the City (tract 169.01) extends past the Santee City limits. City staff reports that there is no Santee population within this tract.

Figure E-3: Distribution of Population with Disabilities

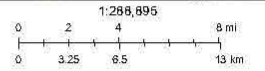


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City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%



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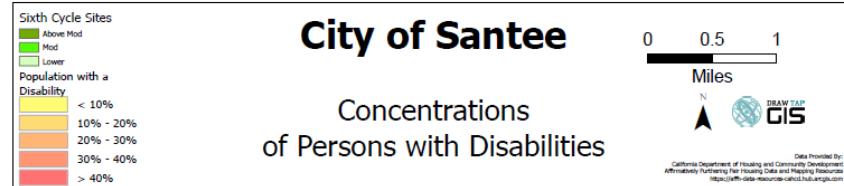
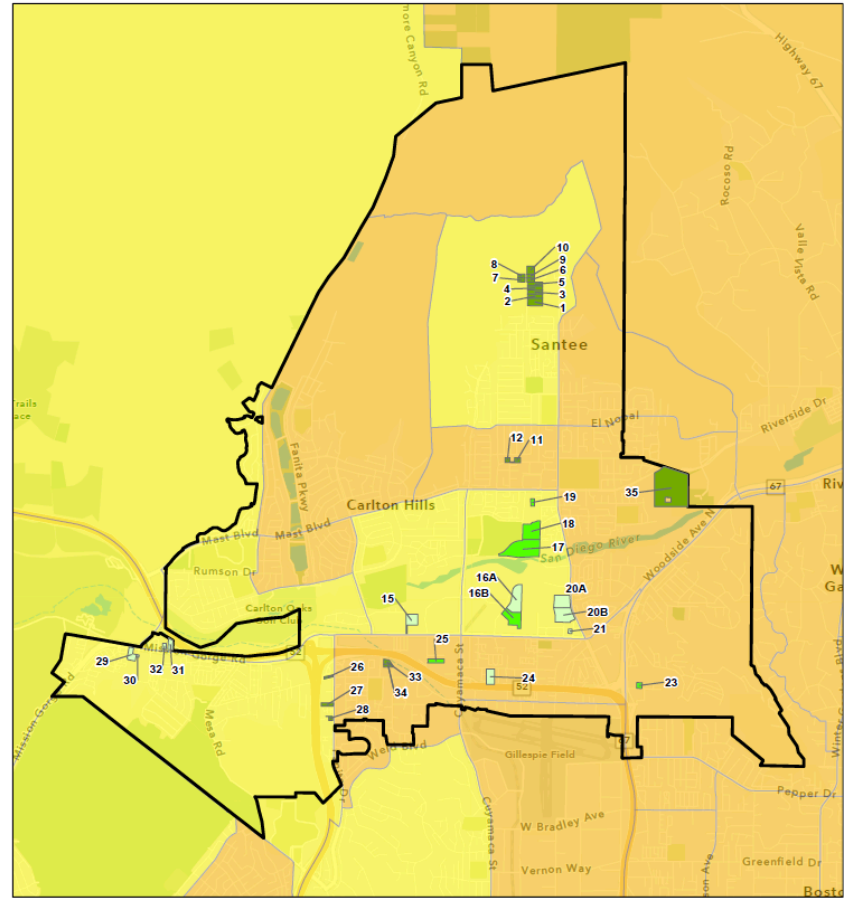
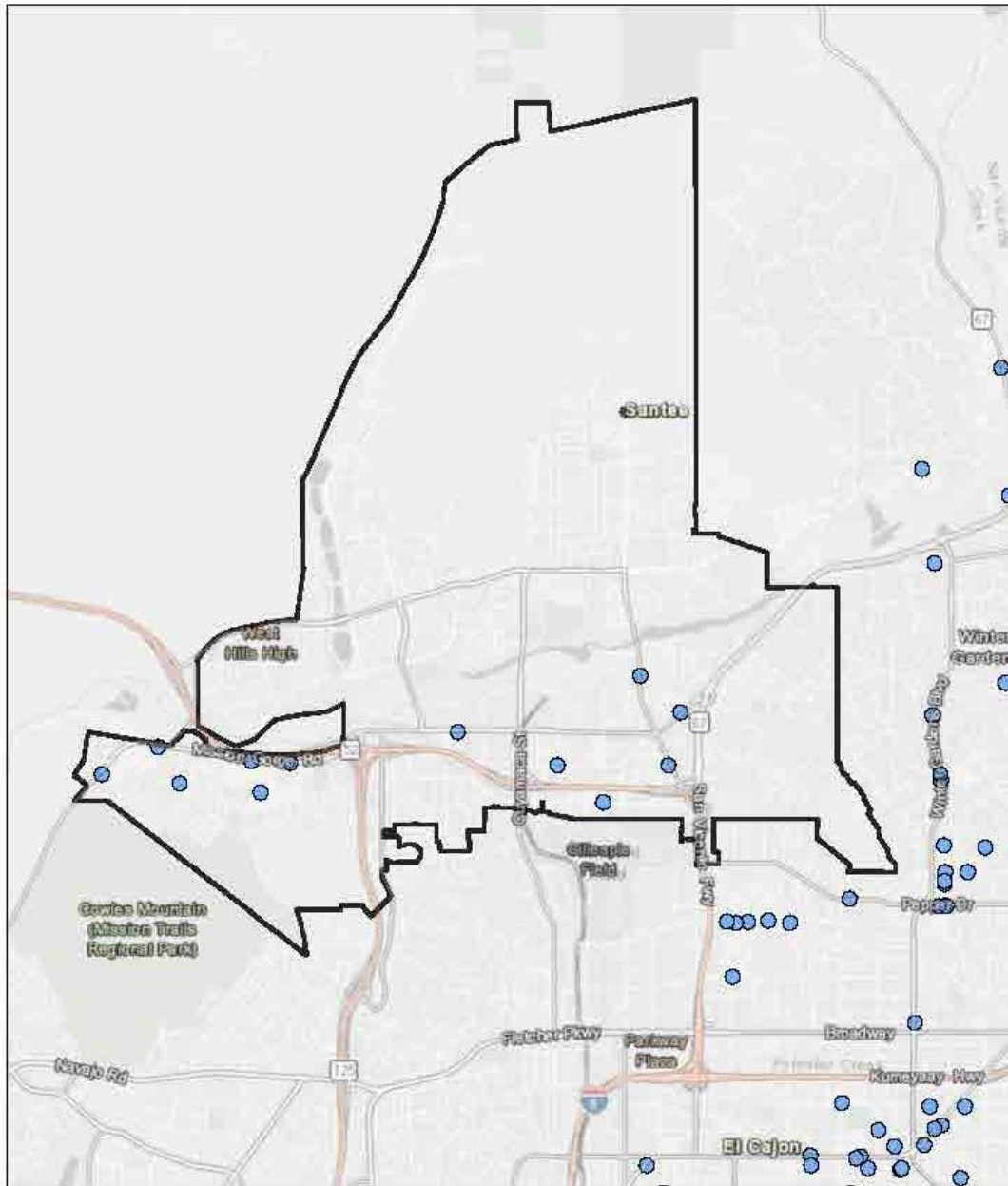


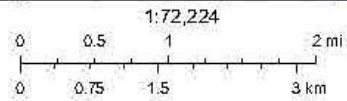
Figure E-4: Mobile Home Park Distribution



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City/Town Boundaries

(A) Mobile Home Parks (HIFLD, 2018)



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CA HCD

Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of household. According to the AFFH data tool ([Figure E-5](#)), there is no concentration of population of adults living alone in the City. Adults living with their spouse are concentrated in the northernmost tract of the City (census tract 169.01, [Figure E-5](#)), where the population of adults living with their spouse is between 60 and 80 percent, compared to the 40 to 60 percent throughout the rest of the City. Considering that there is no population in Santee in this area (see footnote 1), there does not appear to be a concentration of adults in married households.

Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in an apartment complex or confining children to a specific location are also fair housing concerns. Single parent households are also protected by fair housing law. The 2020 AI reported that 32.8 percent of Santee households were families with children. The City's share of families with children is lower than the neighboring cities of El Cajon (40 percent) and Lemon Grove (39 percent), but higher than the City of San Diego (29 percent) and the county overall (33 percent). According to the HCD AFFH map in Figure 5, children in married households are most concentrated in the south and southeasternmost tracts of the city along the city border. The percent of children living in married households in these tract is over 80 percent. Only 13 percent of RHNA units were sited in census tracts with the highest concentration of children in married households in the City ([Table E-6](#)). The lower income RHNA sites are higher density sites and therefore, located in areas that are appropriate for apartments, condominiums, and townhomes. These types of housing are appropriate and more likely to be naturally affordable to small households with no or fewer children.

Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. According to the 2020 Regional AI, about 6.4 percent of Santee households were single-female-headed households with children in 2017. The proportion of single female-headed households with children is higher than the neighboring city of Poway (4.6 percent) and the County (6.0 percent) but lower than El Cajon (20.7 percent) and La Mesa (6.5 percent). Children in single female-headed households are concentrated in the south center tracts of the City (census tracts 166.15 and 166.15, [Figure E-6](#)). Between 20 to 40 percent of children living in these tracts are in single female-headed households.

Only one of the two census tracts with the high concentration of children in female-headed households has RHNA sites ([Figure E-6](#)). This census tract contains 63 percent of the RHNA units, and 66 percent of the lower income units. However, most of the moderate-income units (90 percent) were sited in this census tract as well ([Table E-7](#)).

Table E-6: RHNA Units by % Children in Married-Couple Households

% Children in Married-Couple HH	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 20%	0.0%	0.0%	0.0%	0.0%
20% - 40%	0.0%	0.0%	0.0%	0.0%
40% - 60%	0.0%	0.0%	0.0%	0.0%
60% - 80%	83.3%	90.1%	94.9%	86.8%
> 80%	16.7%	9.9%	5.1%	13.2%
Total Units	1,228	587	295	2,110

Table E-7: RHNA Distribution by % Children in Female-Headed Households (FHH)

% Children in FHH	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 20%	33.6%	9.9%	100.0%	36.3%
20% - 40%	66.4%	90.1%	0.0%	63.7%
40% - 60%	0.0%	0.0%	0.0%	0.0%
60% - 80%	0.0%	0.0%	0.0%	0.0%
> 80%	0.0%	0.0%	0.0%	0.0%
Total Units	1,228	587	295	2,110

Figure E-5: Distribution of Adults Living Alone and Adults in Living with Spouse

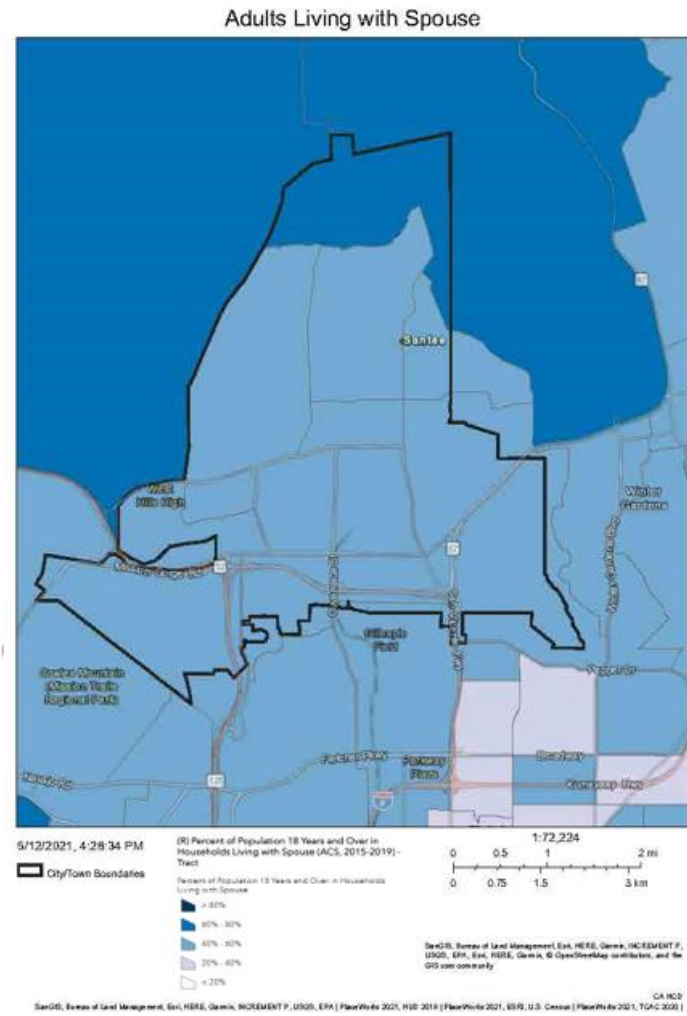
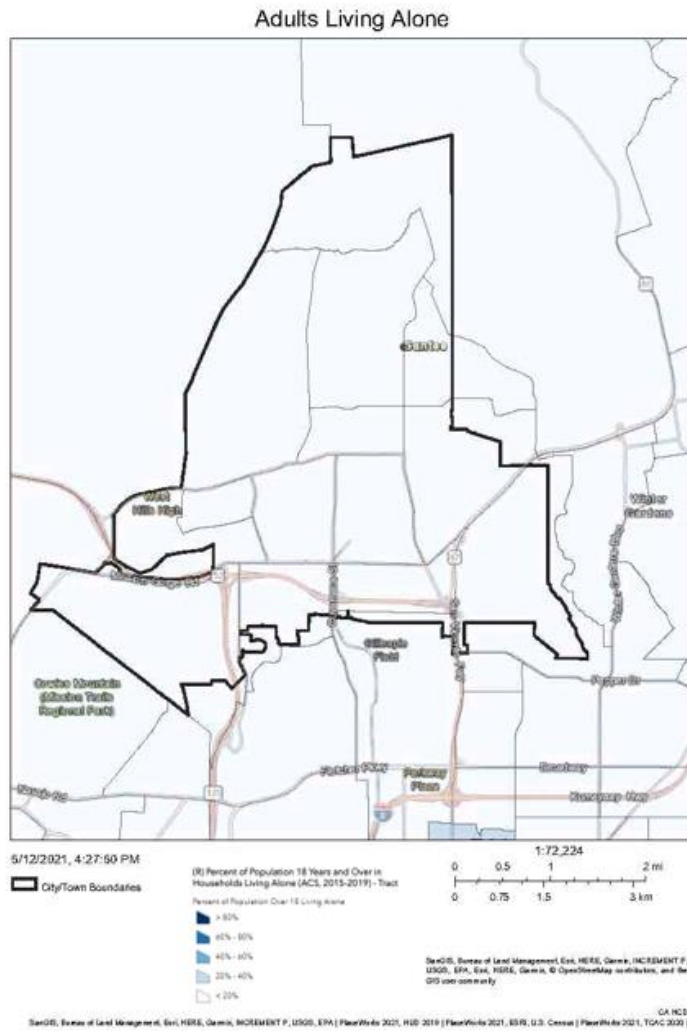
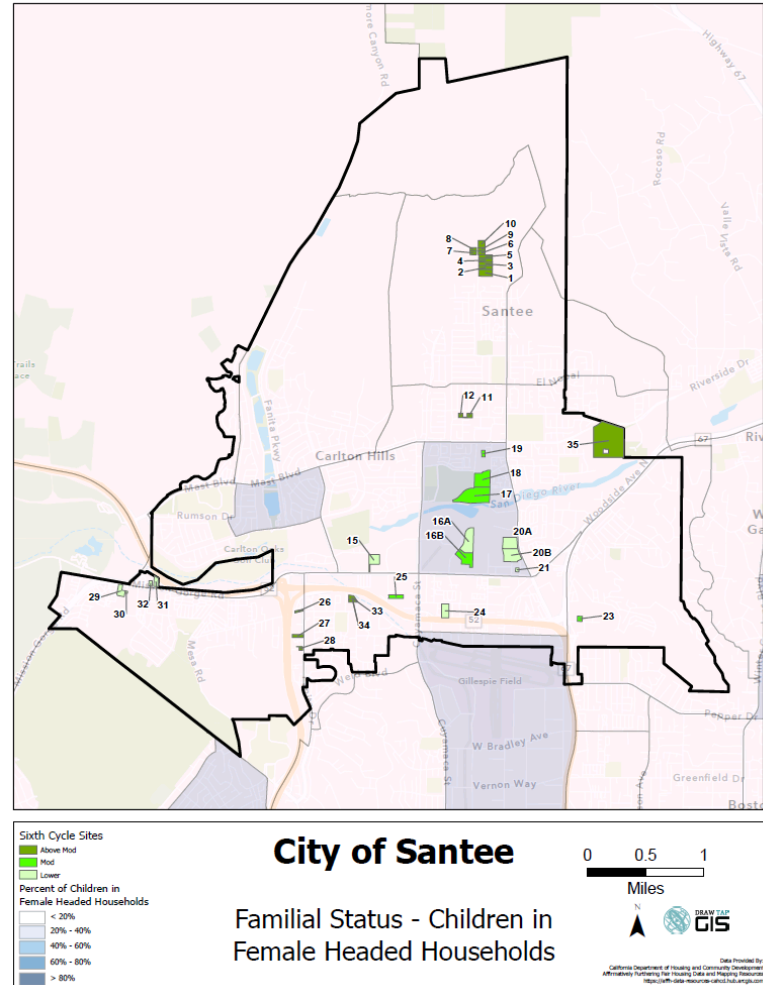
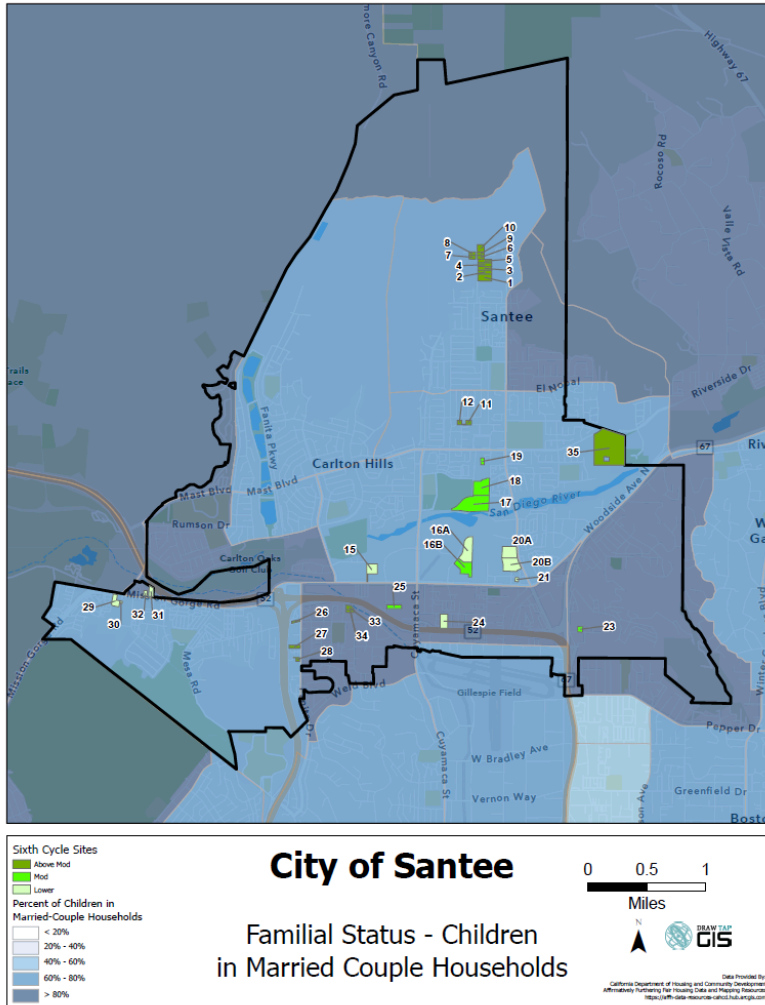


Figure E-6: Children in Married Households and Single Female-Headed Households



Income Level

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. Figure E-7 shows the Lower and Moderate Income (LMI) areas in the County by Census block group. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). LMI areas are concentrated in census tracts south of Santee and in the cities of El Cajon, La Mesa, Lemon Grove, National City, San Diego, and Imperial Beach. The City of Santee has a variety of population income distributions (Figure E-7). The southernmost census tract (closest to El Cajon) has the highest concentration of LMI population, where 50 to 75 percent of households are LMI. The census tracts to the north of this tract range have less than 50 percent LMI households. The block groups in the center/north of the City have the lowest concentration of LMI households (less than 25 percent). According to the 2020 Regional Analysis of Impediments to Fair Housing (2020 Regional AI), Santee has the second highest percentage of population earning more than moderate incomes (62 percent) among its neighbors El Cajon (38 percent), La Mesa (50 percent), and Poway (69 percent).

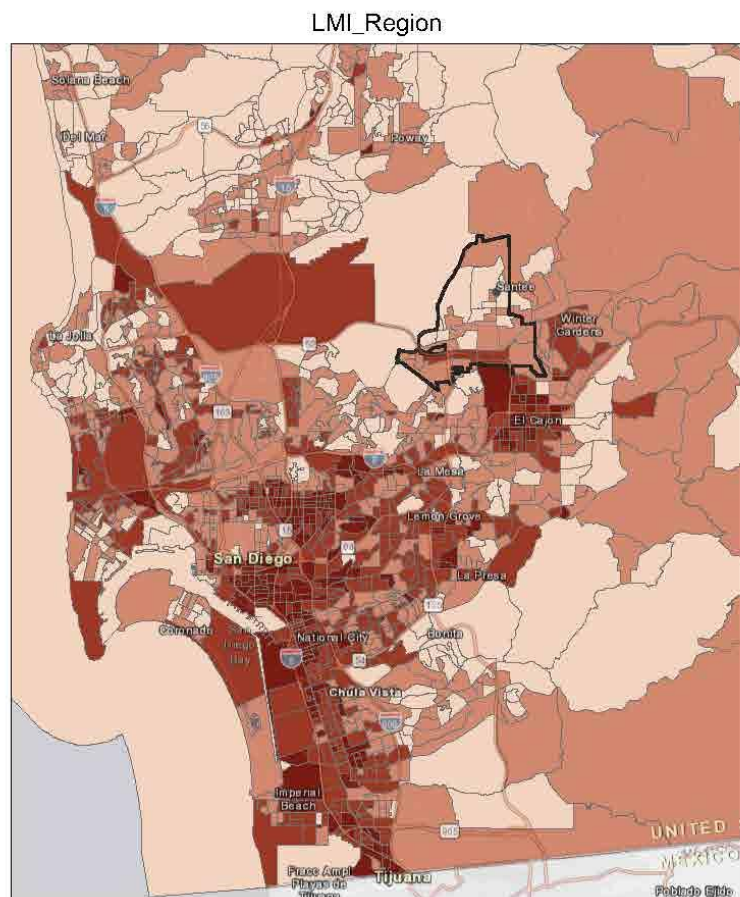
About 86 percent of RHNA units are located in census tracts with the most common concentration of LMI households in the City (Table E-8). The census tract with the highest concentration of LMI households is located south of Mission Gorge Rd. (bounded by Fanita Dr. and Cuyamaca St.). Three percent of RHNA units are located in this census tract, of which zero percent are lower income units.

Table E-8: RHNA Unit Distribution by % LMI Households in Census Tract				
% LMI HH	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 25%	8.1%	0.0%	46.8%	11.3%
25% - 50%	91.9%	93.0%	48.1%	86.1%
50% - 75%	0.0%	7.0%	5.1%	2.7%
75% - 100%	0.0%	0.0%	0.0%	0.0%
Total Units	1,228	587	295	2,110

Housing Choice Voucher

Trends related to housing choice vouchers (HCV) can show patterns of concentration and integration. In Santee, HCV use is concentrated along the southern tracts of the City (Figure E-8). In Census tract 166.17, 16 percent of the renter-occupied units use HCVs, making it the most concentrated HCV area in the City. The westernmost and easternmost census tracts along the southern city limits also have a concentration of HCV use compared to the rest of the city. Census tract 166.17 and the westernmost census tract are also the location for the majority of the City's mobile home parks (Figure E-4). Some LMI census tracts correlate with census tracts that have a high proportion of persons with disabilities, mobile home parks, and HCV use.

Figure E-7: Low and Moderate Income Household Distribution



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City/Town Boundaries

(A) Low to Moderate Income Population (HUD) - Block Group

- < 25%
- 25% - 50%
- 50% - 75%
- 75% - 100%

1:298,895

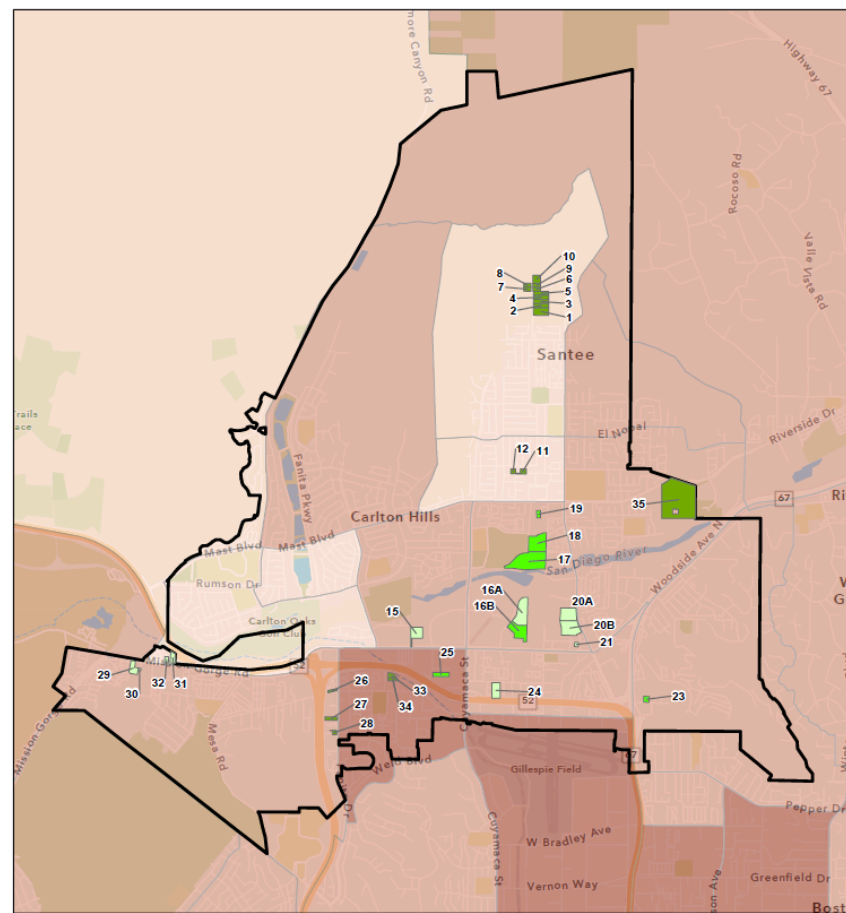
0 2 4 8 mi

0 3.25 6.5 13 km

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Sixth Cycle Sites

- Above Mod
- Mod
- Lower

LOWMODPCT

- < 25%
- 25% - 50%
- 50% - 75%
- 75% - 100%

City of Santee

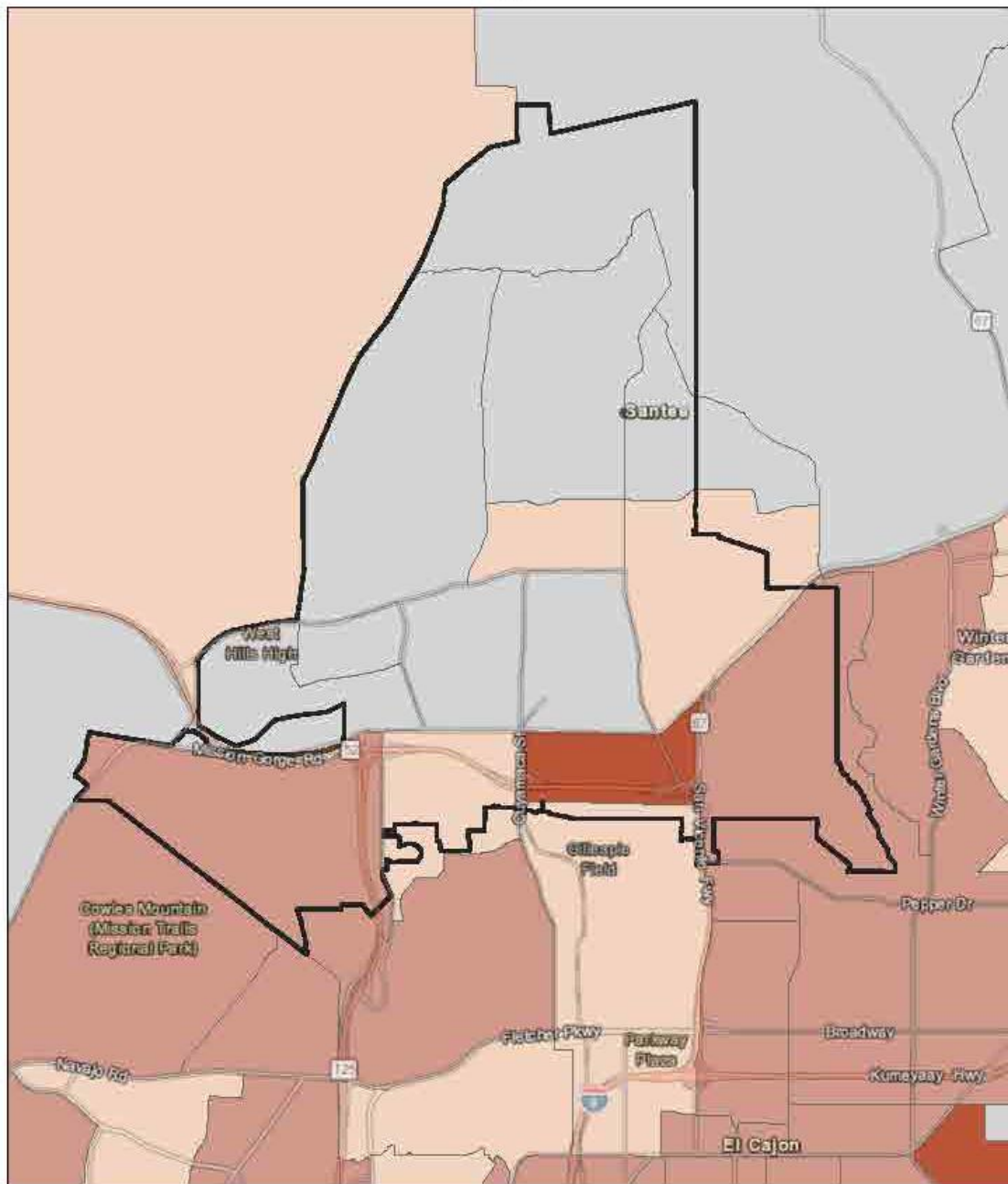
Low to Moderate Income Population (Tract) - (HUD)

0 0.5 1 Miles

SanGIS

California Department of Housing and Community Development
 Affirmatively Furthering Fair Housing Data and Mapping Resources
 https://www.dhcd.ca.gov/affirmative-fair-housing-data-mapping-resources

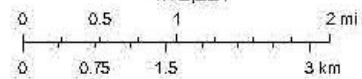
Figure E-8: Housing Choice Voucher Concentration



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1:72,224

- City/Town Boundaries
- > 0 - 5%
- > 5% - 15%
- > 15% - 30%
- No Data



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CA HCD

3. RACIALLY AND ETHNICALLY CONCENTRATED AREAS

Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)

In an effort to identify racially/ethnically-concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. In San Diego County, there are R/ECAPs scattered in small sections of Escondido, El Cajon, La Mesa, Lemon Grove, National City, and Chula Vista (Figure E-9). Larger R/ECAP clusters can be seen in the central/southern portion of the City of San Diego. There are no R/ECAPs in Santee. Because of this, zero percent of RHNA units are located in R/ECAP sites. As shown in the 2021 TCAC/HCD maps (next section) and minority concentration analysis (see Patterns of Segregation and Minority Concentrations above), Santee is made up of moderate-high resource areas with a small minority population.

Racially Concentrated Areas of Affluence (RCAs)

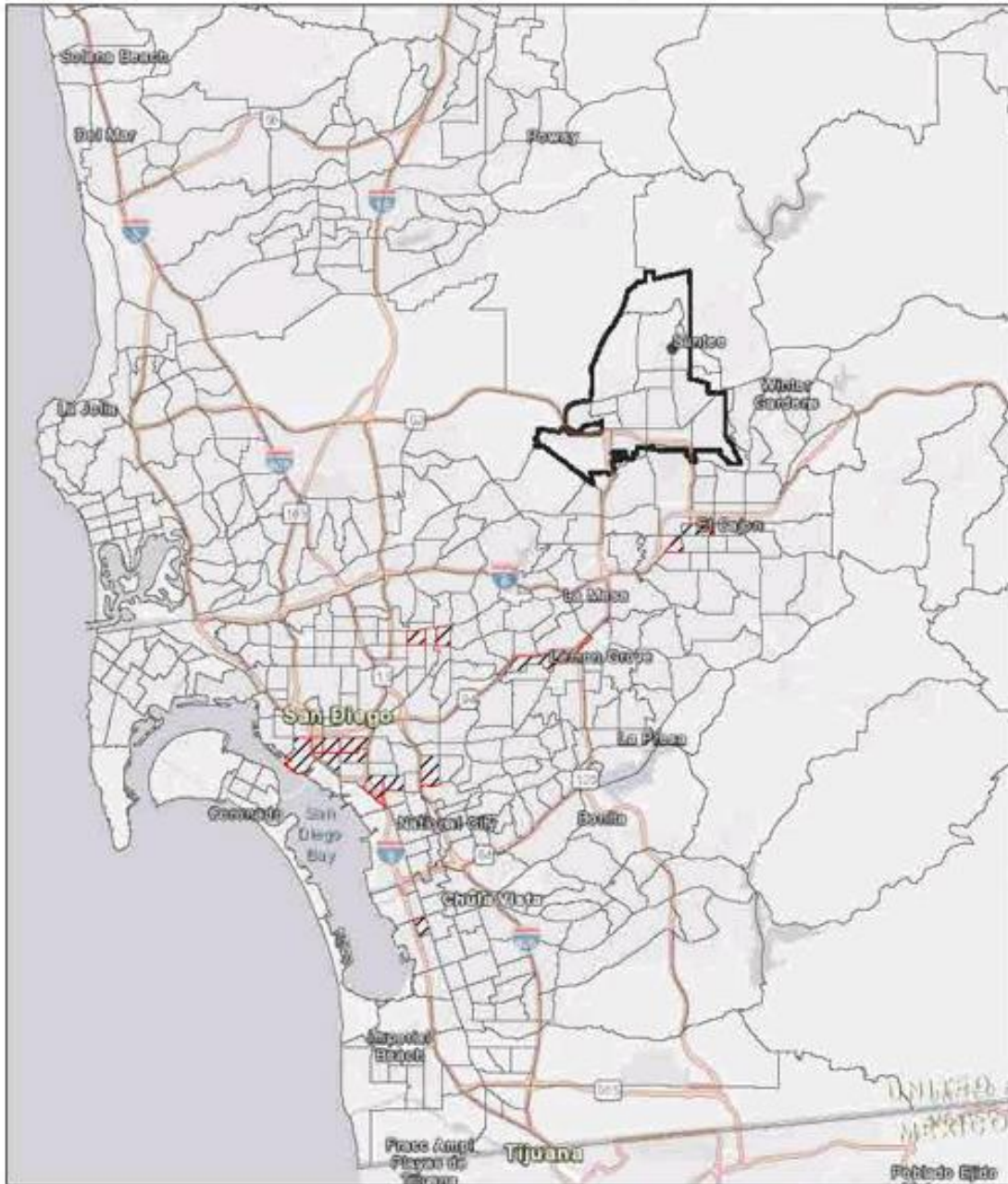
While racially concentrated areas of poverty and segregation (RECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to a policy paper published by HUD, RCAs are defined as affluent, White communities. According to HUD's policy paper, Whites are the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.

While HCD has created its own metric for RCAs, at the time of this writing the map on the AFFH tool is not available. Thus, the definition of RCAs used in this analysis is the definition used by the scholars at the University of Minnesota Humphrey School of Public Affairs cited in HCD's memo: "RCAs are defined as census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater (slightly more than double the national the median household income in 2016). As shown in Table E-9 none of the census tracts in Santee have more than 80 percent non-Hispanic White population. White population in Santee census tracts ranges from 66 to 78 percent and in all but one census tracts, non-Hispanic whites dominate the share of the tract by over 50 percent (Figure E-10). The median income in the northern census tracts is more than \$125,000 (Figure E-10). Higher median incomes do not appear to be correlated with white concentration. Although the City of Santee is majority, White non-Hispanic, no RCAs are located within the City. The City of Santee has historically developed as a middle-class bedroom community consisting primarily of single-family tract housing built after the Second World War in the 1950's, 60's and 70s. The majority White, non-Hispanic racial makeup of the City is likely a result of the predominance of single-family tract housing in the City and not due other factors such as redlining, which was a practice declared unconstitutional by the Supreme Court in *Shelley v. Kraemer* in 1948 before most of the Santee housing stock was developed. The working class in San Diego County at the time most of the City's housing stock was developed with primarily White, non-Hispanic. With the last two housing element cycles the City has been upzoning properties throughout the City that allow for greater residential densities and a greater diversity in housing types, including multifamily housing. The racial makeup of the City has also been diversifying with the White, non-Hispanic population declining from approximately 90% in 1980 to 64% in 2020. Over the last 15 years, as new multifamily products have come online, the City has witnessed increased diversity as these products are more affordable. The increase in multifamily housing in Santee has resulted in greater racial

diversity because the multifamily product is relatively more affordable to all income groups. This Housing Element includes the upzoning of numerous properties throughout the City to encourage additional multifamily housing that is affordable to a more diverse population.

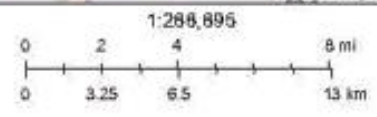
Table E-9: Percent White Population by Census Tract	
Tract	Percent White Population
166.05	74.4%
166.06	67.9%
166.07	72.3%
166.08	78.0%
166.09	72.7%
166.10	71.8%
166.12	72.7%
166.13	72.1%
166.14	69.3%
166.15	58.8%
166.16	66.2%
166.17	66.7%
95.04	62.4%

Figure E-2: Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)



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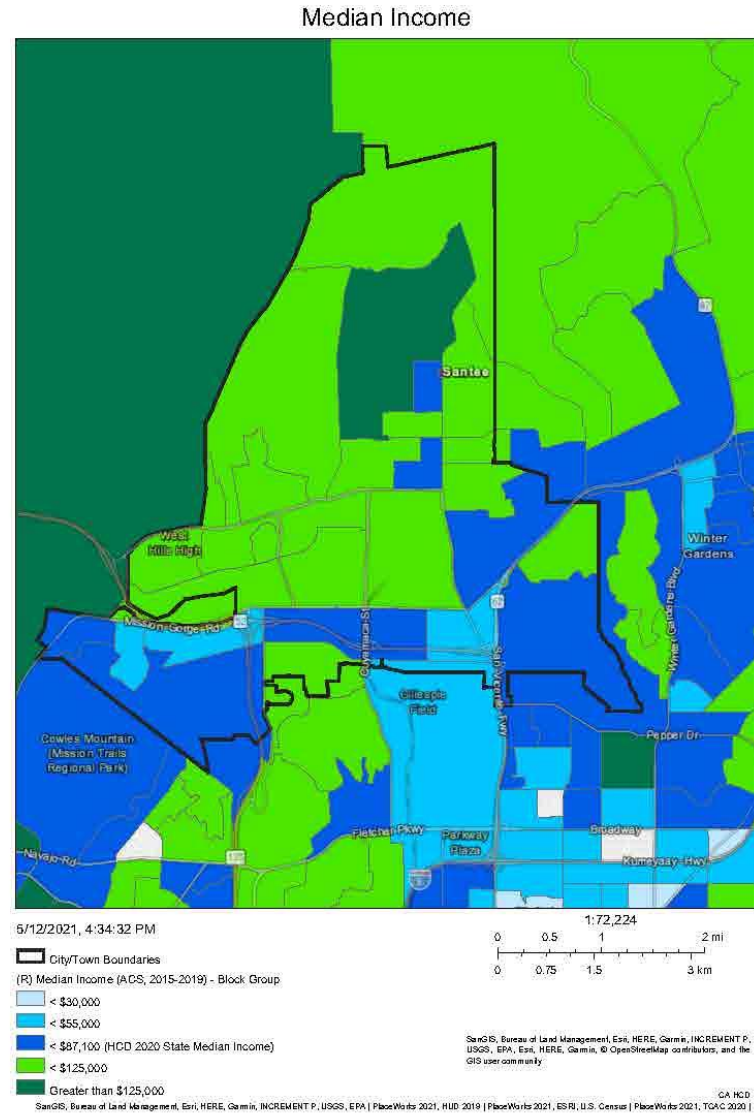
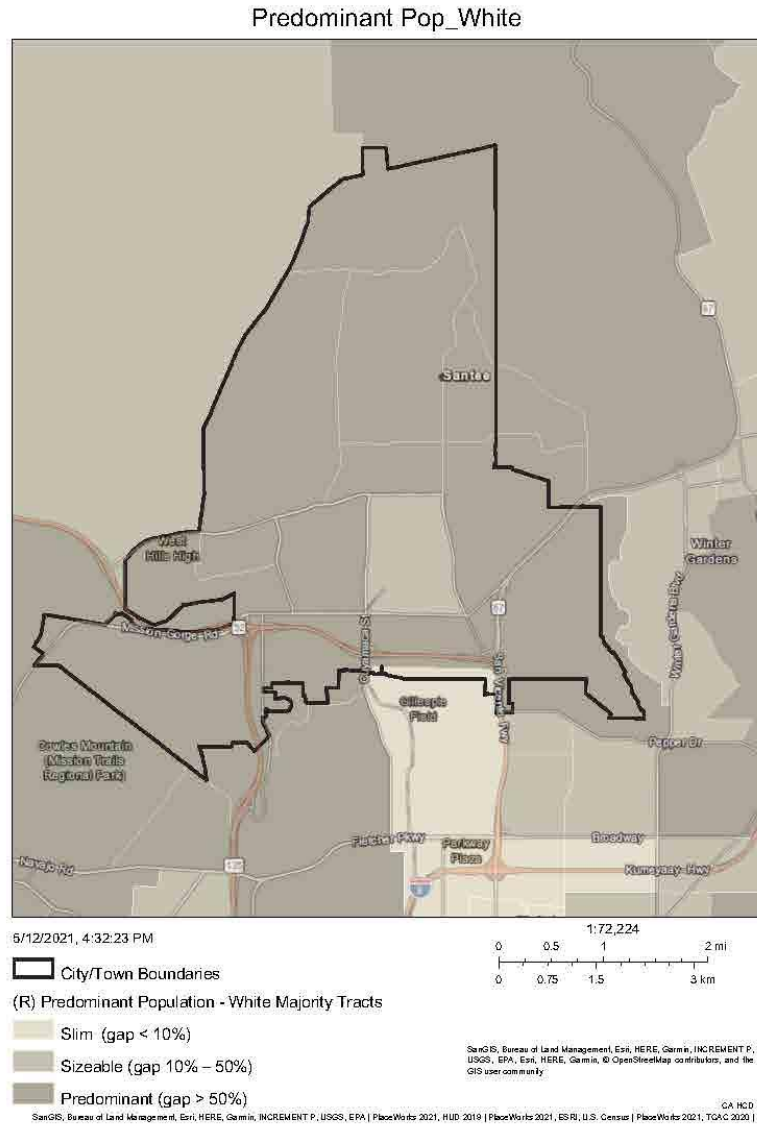
- City/Town Boundaries
- (R) Racially or Ethnically Concentrated Areas of Poverty "R/ECAPs" (HUD, 2009 - 2013) - Tract
- Current R/ECAP Score
- 1 - R/ECAP
- 0 - Not a R/ECAP



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Figure E-10: Racially Concentrated Areas of Affluence (RCAs)



4. ACCESS TO OPPORTUNITIES

“Significant disparities in access to opportunity” are defined by the AFFH Final Rule as “substantial and measurable differences in access to educational, transportation, economic, and other opportunities in a community based on protected class related to housing.”

TCAC Opportunity Maps

The Department of Housing and Community Development (HCD) and California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/ departments to further the fair housing goals (as defined by HCD).” The Task Force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9 percent Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators. [Table E-10](#) shows the full list of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- **Poverty:** Tracts with at least 30 percent of population under federal poverty line
- **Racial Segregation:** Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

Table E-10: Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020

According to the 2021 TCAC/HCD opportunity area map, there are no census tracts or areas of high racial segregation and poverty in Santee ([Figure E-11](#)). The regional map in [Figure E-12](#) identify most areas with high segregation and poverty in the Southern County, specifically in Chula Vista, National City, and the City of San Diego. The closest tracts to Santee with high segregation and poverty are found in El Cajon.

According to the HCD/TCAC opportunity map ([Figure E-11](#)), Santee is made up of moderate and high resource census tracts ([Table E-11](#)). Categorization is based on percentile rankings for census tracts within the San Diego Region. Higher composite scores mean higher resources. Locally, eastern census tracts scored lower (as moderate), indicating lower resources than other tracts within the City

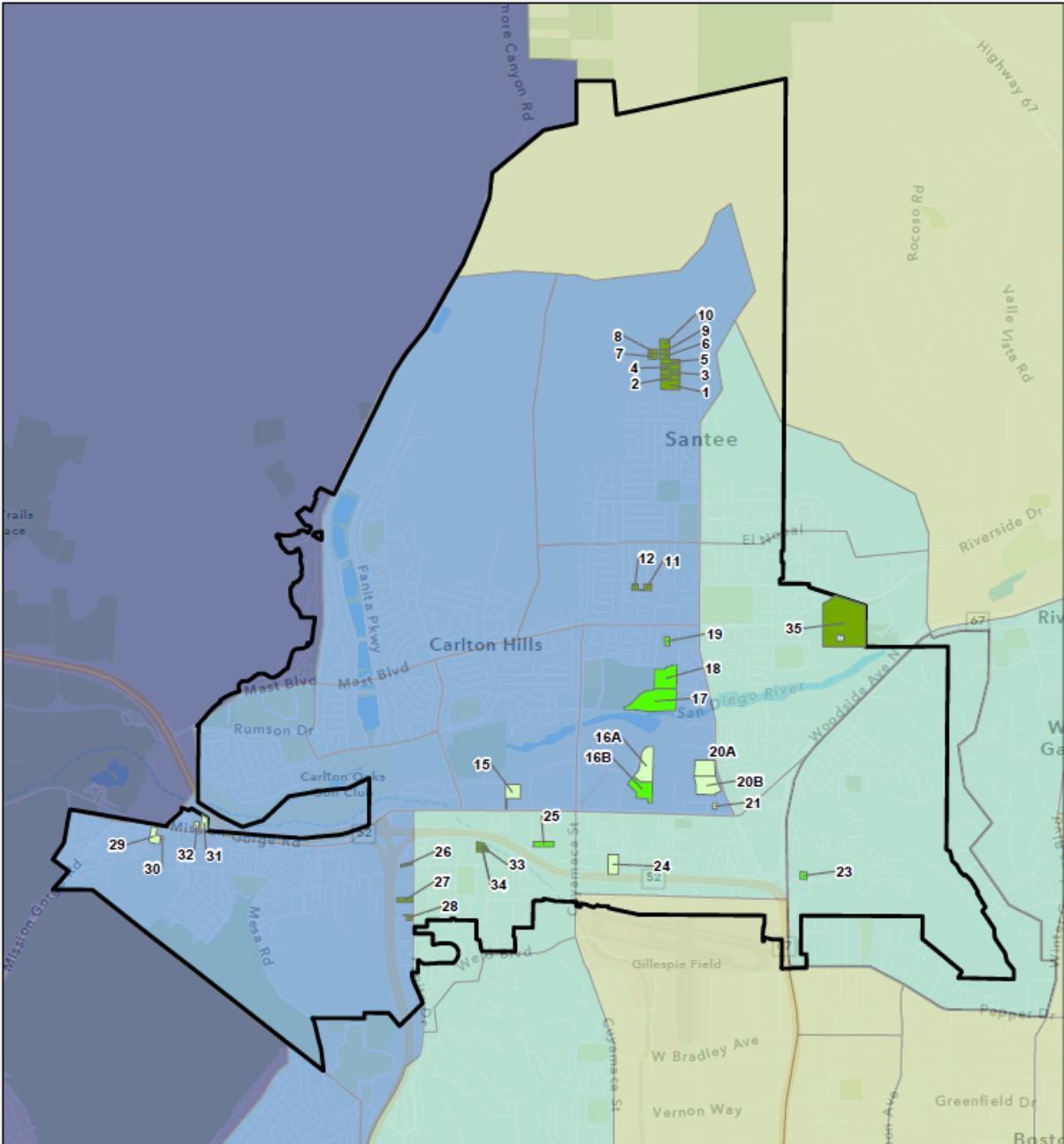
(Figure E-11). High and highest resource tracts were concentrated on the western side of the City. Regionally, a higher concentration of lower resource areas are located surrounding the City of Santee in El Cajon and Lakeside and in a larger scale in the Southern County, along the U.S-Mexico border and along the coast (in the cities of Imperial Beach, Chula Vista, and National City). As shown in Table E-11, there does not appear to be a correlation between minority concentration and resource categories.

Table E-11: Minority Concentration and 2021 TCAC/HCD Resource Category		
Tract	Minority Concentration	Resource Category
166.08	22.0%	Moderate Resource
166.05	25.6%	High Resource
166.12	27.3%	High Resource
166.09	27.3%	High Resource
166.07	27.7%	Moderate Resource
166.13	27.9%	High Resource
166.1	28.2%	High Resource
166.14	30.7%	High Resource
166.06	32.1%	High Resource
166.17	33.3%	Moderate Resource
166.16	33.8%	Moderate Resource
95.04	37.6%	Highest Resource
166.15	41.2%	High Resource
Source: 2014-2018 American Community Survey, 2021 TCAC/HCD Opportunity Maps Statewide Summary Table.		

Locally, eastern and southeastern census tracts scored lower (as moderate), indicating lower resources than other tracts within the City (Figure E-11). Figure E-11 also shows the distribution of RHNA sites across the TCAC opportunity areas. About 86 percent of all RHNA units are located in high resource areas (Table E-12). Of the 1,228 lower income RHNA units, 91 percent are in highest resource tracts.

Table E-12: RHNA Units by TCAC Opportunity Areas				
Opportunity Area	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
Moderate Resource (Rapidly Changing)	0.0%	2.9%	0.0%	0.8%
Moderate Resource	8.6%	7.0%	46.4%	13.4%
High Resource	91.4%	90.1%	53.6%	85.8%
Grand Total	1,228	587	295	2,110

Figure E-11: TCAC Opportunity Areas in Santee



Sixth Cycle Sites

- Above Mod
- Mod
- Lower

TCAC Opportunity Areas 2021

- Highest Resource
- High Resource
- Moderate Resource (Rapidly Changing)
- Moderate Resource
- Low Resource
- High Segregation & Poverty
- Missing/Insufficient Data

City of Santee

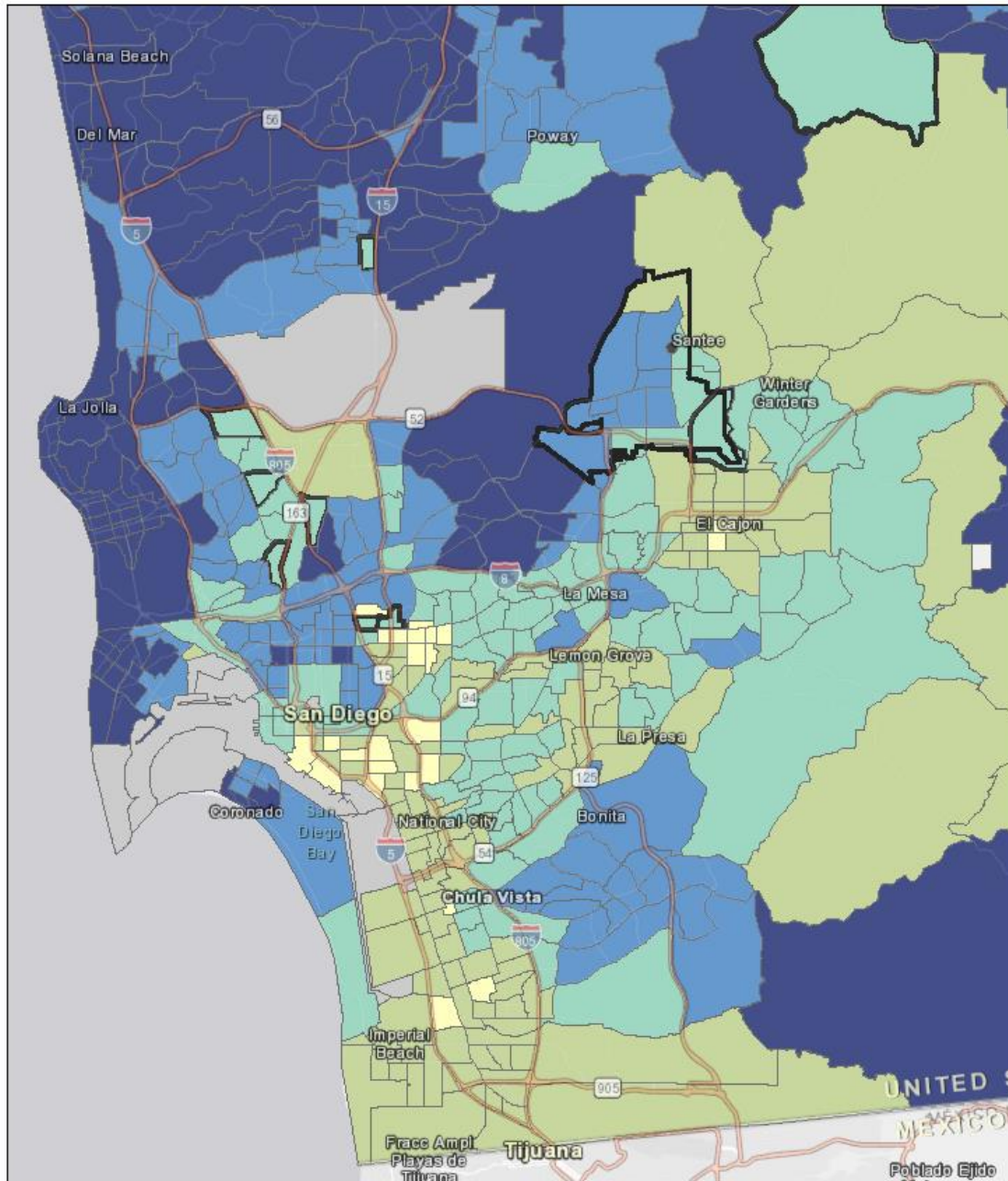
TCAC Opportunity Areas 2021 Composite Score Tract

0 0.5 1
Miles



N

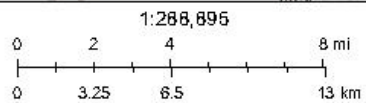
Data Provided By:
California Department of Housing and Community Development
Affirmatively Furthering Fair Housing Data and Mapping Resources
<https://affirm-data-resources-calcd.hud.usgib.com>

Figure E-12: TCAC Opportunity Areas in the Southern County Region



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-  City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Composite Score - Tract
-  Highest Resource
-  High Resource
-  Moderate Resource (Rapidly Changing)
-  Moderate Resource
-  Low Resource



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CA HCD

Opportunity Indicators

While the Federal Affirmatively Furthering Fair Housing (AFFH) Rule has been repealed, the data and mapping developed by HUD for the purpose of preparing the Assessment of Fair Housing (AFH) can still be useful in informing communities about segregation in their jurisdiction and region, as well as disparities in access to opportunity. This section presents the HUD-developed index scores based on nationally available data sources to assess Santee residents' access to key opportunity assets in comparison to the County. [Table E-13](#) provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices:

- **Low Poverty Index:** The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. *The higher the score, the less exposure to poverty in a neighborhood.*
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. *The higher the score, the higher the school system quality is in a neighborhood.*
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. *The higher the score, the higher the labor force participation and human capital in a neighborhood.*
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). *The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.*
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. *The higher the index, the lower the cost of transportation in that neighborhood.*
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. *The higher the index value, the better the access to employment opportunities for residents in a neighborhood.*
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. *Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.*

In San Diego County, Native American, Black, and Hispanic residents were more likely (compared to other racial/ethnic groups) to be impacted by poverty, limited access to proficient schools, and lower labor participation rate. Black residents were most likely to reside in areas with the lowest

environmental quality levels, the lowest accessibility to employment centers, and the lowest cost of transportation. Black and Asian residents scored highest as most likely to utilize public transportation. Within the City of Santee, there are no significant discrepancies in access to resources and opportunities among different race groups or among persons living above or below poverty. For example, for the entire population, the low poverty index ranges from 69 to 70 among different races. For the population living below the federal poverty line, the low poverty index ranged from 66 in White, Non-Hispanics to 75 in the Asian/Pacific Islander population. The opportunity indicators did show disproportionately lower scores for Blacks and Native Americans in terms of access to employment. However, these two groups represent very small percentages of the City's population.

Table E-13: Opportunity Indicators by Race/Ethnicity

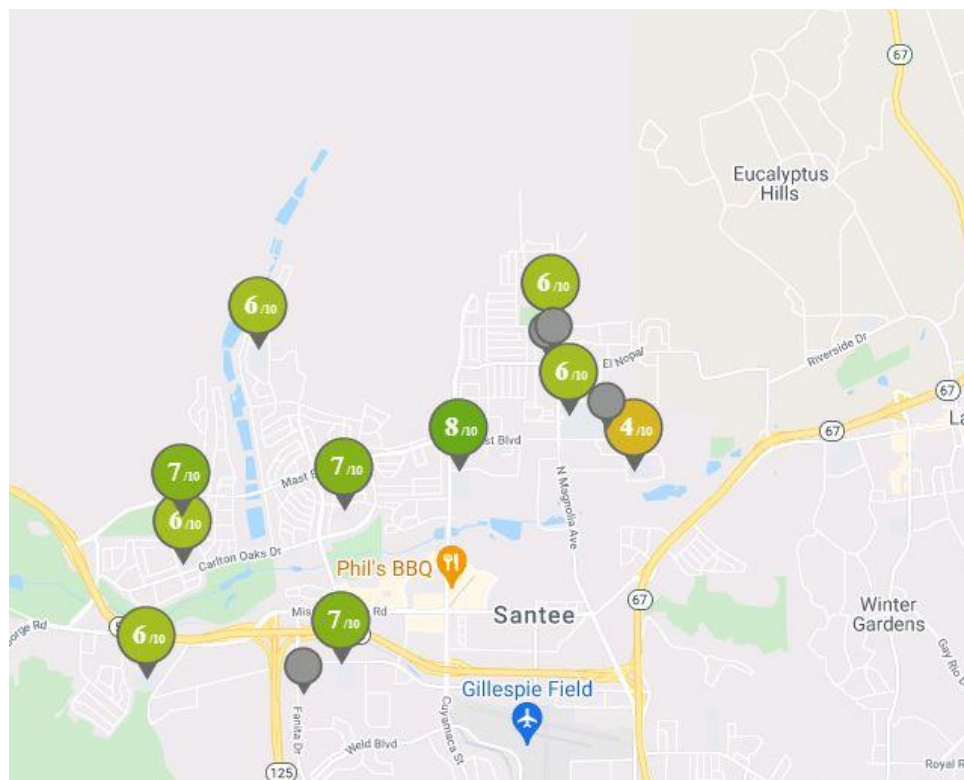
City of Santee	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	69.83	78.14	49.29	84.84	64.16	44.37	47.24
Black, Non-Hispanic	68.69	79.70	40.44	83.79	66.05	56.11	45.21
Hispanic	69.41	78.36	47.70	84.77	64.75	48.32	46.15
Asian or Pacific Islander, Non-Hispanic	69.90	79.62	47.36	84.22	64.42	49.78	46.20
Native American, Non-Hispanic	70.35	77.07	48.44	84.06	63.91	43.52	47.93
Population below federal poverty line							
White, Non-Hispanic	65.71	77.70	48.15	84.63	64.63	48.01	44.73
Black, Non-Hispanic	69.79	77.16	56.49	85.38	61.96	63.50	49.63
Hispanic	69.44	79.81	49.54	83.95	64.00	48.99	46.61
Asian or Pacific Islander, Non-Hispanic	75.16	74.24	55.79	86.75	66.23	50.10	46.26
Native American, Non-Hispanic	66.24	83.59	61.38	81.16	59.21	30.44	53.33
San Diego County							
Total Population							
White, Non-Hispanic	61.91	64.61	48.93	70.89	55.42	52.89	54.81
Black, Non-Hispanic	51.74	53.72	35.21	78.11	63.07	49.79	43.66
Hispanic	51.71	53.49	37.87	75.68	60.19	51.28	47.15
Asian or Pacific Islander, Non-Hispanic	65.75	64.96	55.06	78.19	59.63	51.68	47.98
Native American, Non-Hispanic	50.41	48.00	31.93	54.60	47.68	56.76	67.85
Population below federal poverty line							
White, Non-Hispanic	51.94	58.45	41.93	72.79	58.18	52.36	51.65
Black, Non-Hispanic	42.16	42.08	33.28	86.15	69.30	48.05	36.75
Hispanic	39.99	46.71	32.57	79.68	65.00	48.70	42.87
Asian or Pacific Islander, Non-Hispanic	60.01	60.14	48.58	75.21	59.26	51.72	50.68
Native American, Non-Hispanic	45.10	37.12	34.42	64.82	54.52	51.65	57.91
Note: American Community Survey Data are based on a sample and are subject to sampling variability. See page 45 for index score meanings. Table is comparing the total Santee and County population, by race/ethnicity, to the Santee and County population living below the federal poverty line, also by race/ethnicity. Source: AFFHT Data Table 12; Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA							

Education

School proficiency scores are indicators of school system quality. In Santee, school proficiency scores ranged from 77 to 80 across all races and from 73 to 84 across all races living below the federal poverty line. No significant differences in scores indicate a similar access to schools. In addition, all races and all races living below the poverty level had access to higher quality schools in Santee compared to the County overall, where school proficiency scores ranged from 37 to 64. The higher the score, the higher the quality of schools.

Greatschools.org is a non-profit organization that rates schools across the States. The Great Schools Summary Rating calculation is based on four ratings: the Student Progress Rating or Academic Progress Rating, College Readiness Rating, Equity Rating, and Test Score Rating. Ratings at the lower end of the scale (1-4) signal that the school is “below average”, 5-6 indicate “average”, and 7-10 are “above average.” [Figure E-13](#) shows that Santee elementary, middle, and high schools mostly rate as average, with the exception of Hill Creek Elementary, which scored a 4 (below average). Similar access to educational opportunities across the City is shown in TCAC’s Education Score¹⁰ map ([Figure E-14](#)). All census tracts, except for the northernmost tract, scored between 0.5 to 0.75, where one is the most positive education outcome.

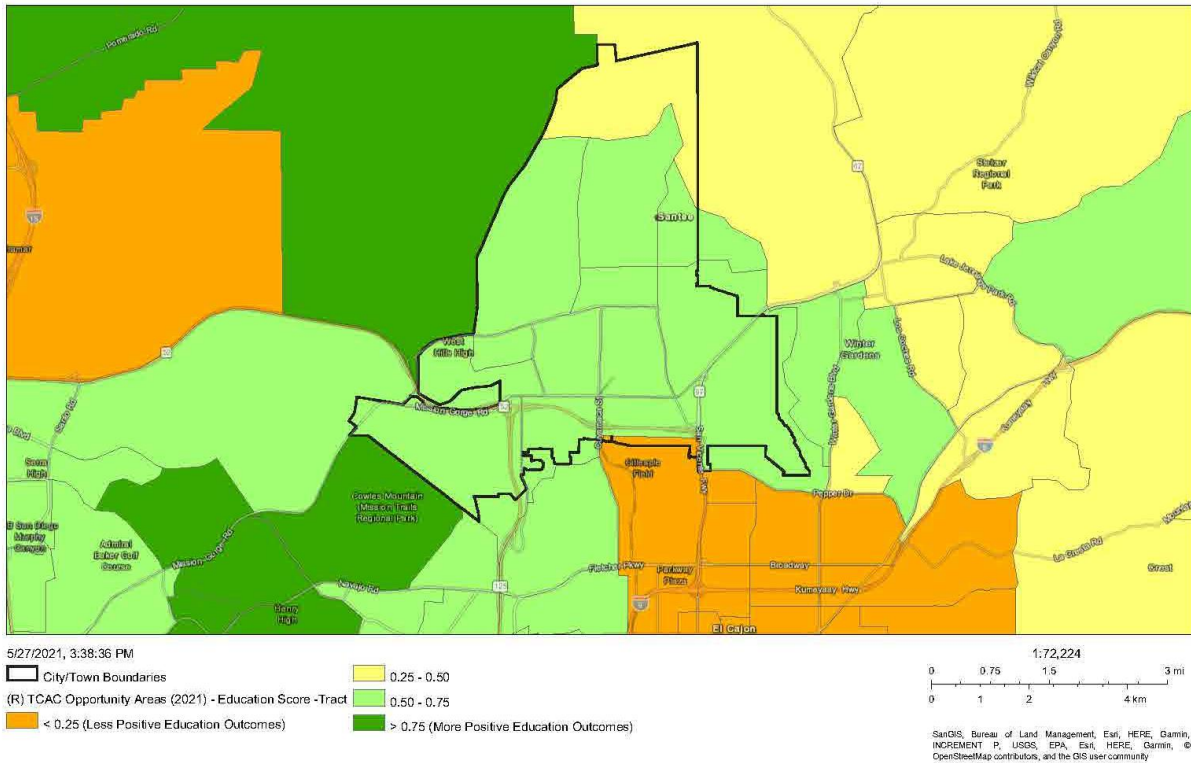
Figure E-13: GreatSchools Ratings



⁹ For more information of GreatSchools ratings, visit: <https://www.greatschools.org/gk/ratings/>

¹⁰ Education scores are a composite of different indicators including: math proficiency, reading proficiency, high school graduation rates, student poverty rates

Figure E-14: TCAC Education Score Map



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Transportation

HUD’s opportunity indicators have two categories to describe transportation- transit index and low transportation cost. Transit index scores did not differ between races or between the total population and the population living in poverty. Transit index scores fell in the 80s range across all races. Low transportation cost scores fell in the 60s across all races and did not differ for the population living below the poverty line. Considering that a higher transit index score indicates a higher likelihood to use public transit and a higher “low transportation cost” indicates a lower cost of transportation, Santee has better access to transit compared to the County. In the County, transit scores were lower (residents less likely to use transit) and low transportation costs were lower (transit is more costly).

All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the most recent data posted (2019), Santee has an AllTransit Performance Score of 3.7. This is a relatively low score but the map in [Figure E-15](#) shows that areas near the City’s downtown have higher scores (and better access). [Figure E-16](#) shows that the number of transit stops within ½ mile of households does is greatest in the downtown but does not differ across the other areas. The northernmost, easternmost, and westernmost areas of the City do not have any access.

Figure E-15: AllTransit Performance Score

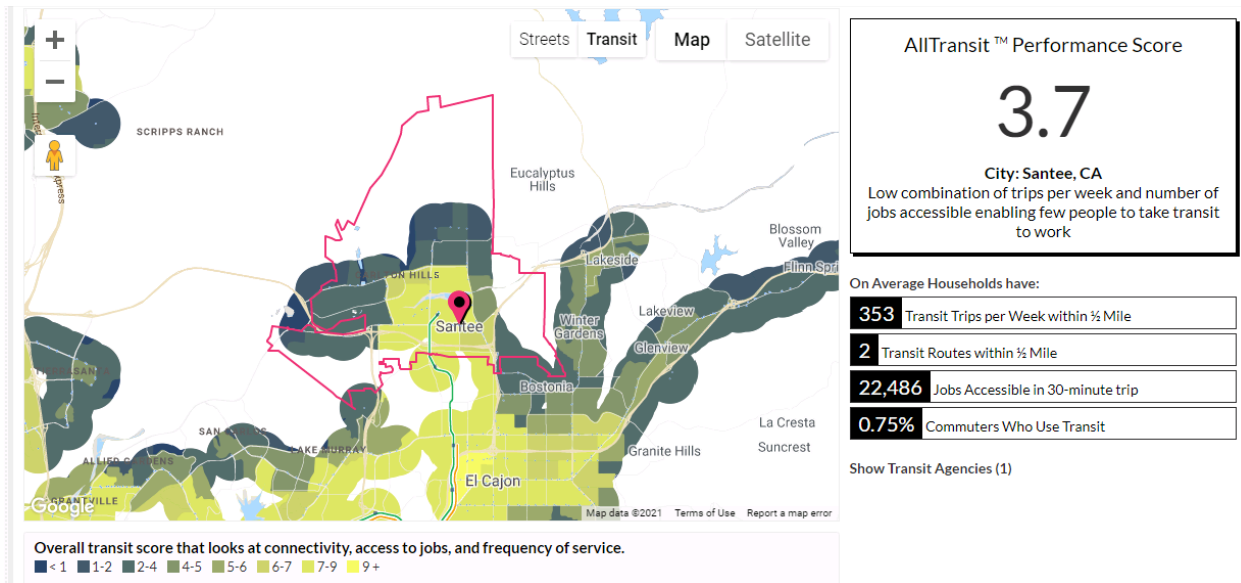
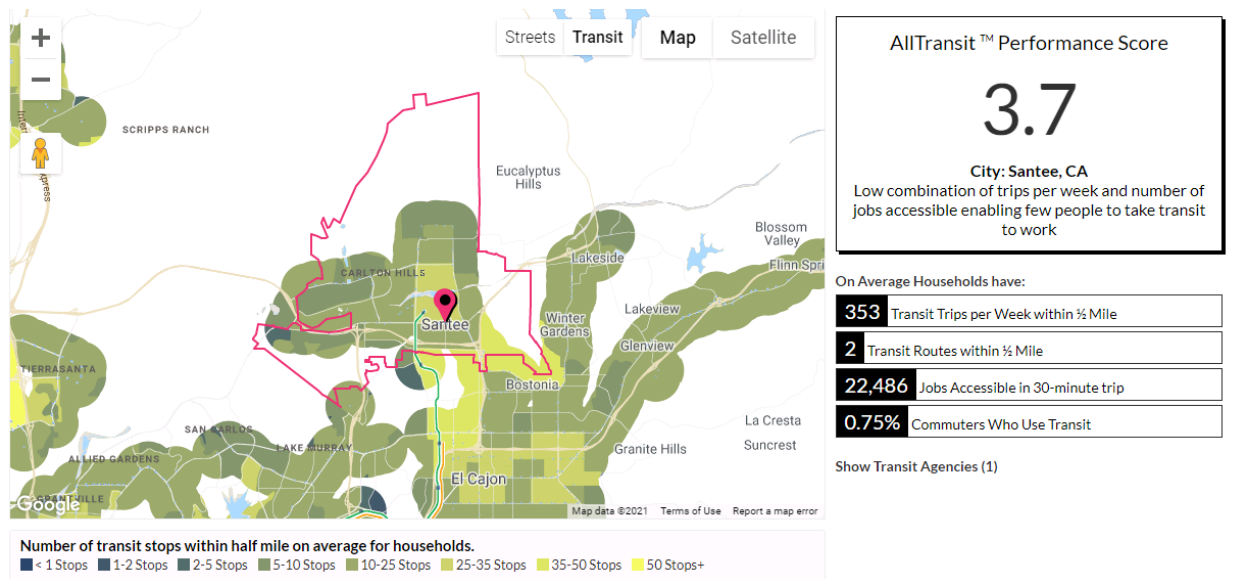


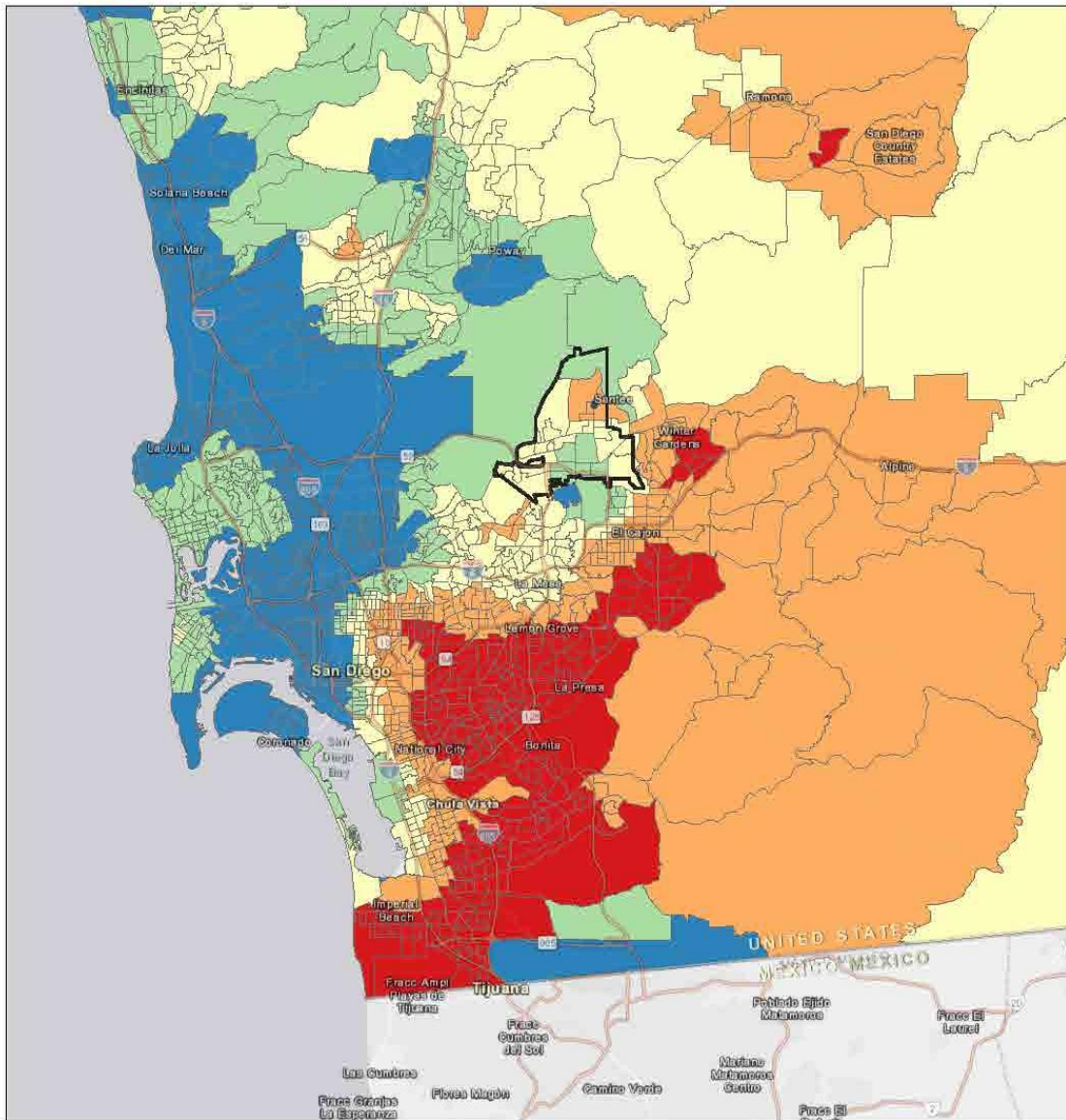
Figure E-16: Number of Transit Stops within ½ Mile of Households



Economic Development

HUD’s opportunity indicators provide scores for labor market and jobs proximity. The labor market score is based the level of employment, labor force participation, and educational attainment in a census tract. Santee had higher labor market index scores than the County overall, indicating a higher labor force participation and human capital in a neighborhood. The jobs proximity score quantifies the accessibility of a neighborhood to jobs in the region. Santee scored lower than the County overall. This may be due to the location of the City outside the central areas of the County, where the higher job proximity scores are located (Figure E-17). Within the City, higher job proximity scores are located near its boundaries with El Cajon, Poway, and Scripps Ranch.

Figure E-17: Jobs Proximity Index



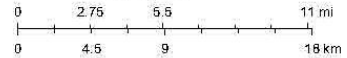
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City/Town Boundaries

(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group

- < 20 (Furthest Proximity)
- 20 - 40
- 40 - 60
- 60 - 80
- > 80 (Closest Proximity)

1:288,895

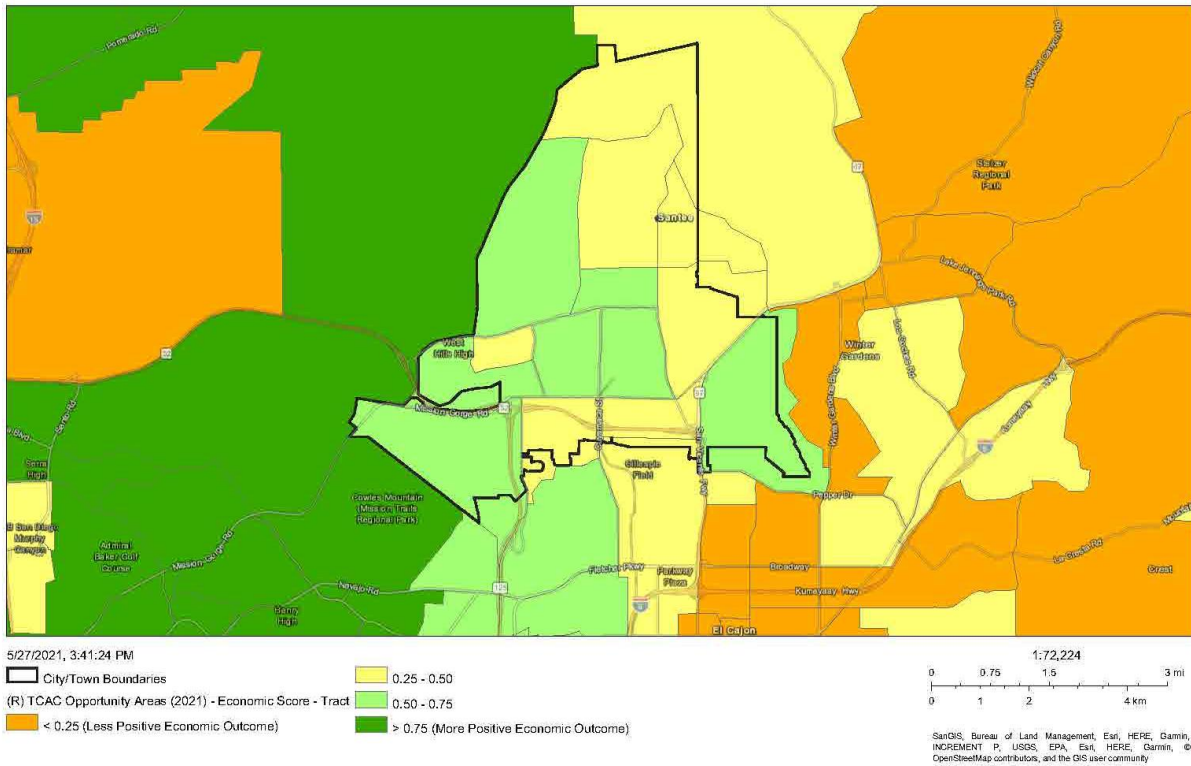


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TCAC Economic Scores are based on a composite of the following area characteristics: poverty, adult education, employment, job proximity, median home value. Within the County, lower economic scores are concentrated along the southern coast in the City of San Diego, Imperial Beach, and National City and in the eastern areas in El Cajon. None of the tracts in Santee scored among the lowest scores (less than 0.25). Within the City, southernmost tracts along the City’s downtown and in the eastern tracts scored lower (0.25-0.50).

Figure E-18: TCAC Economic Score

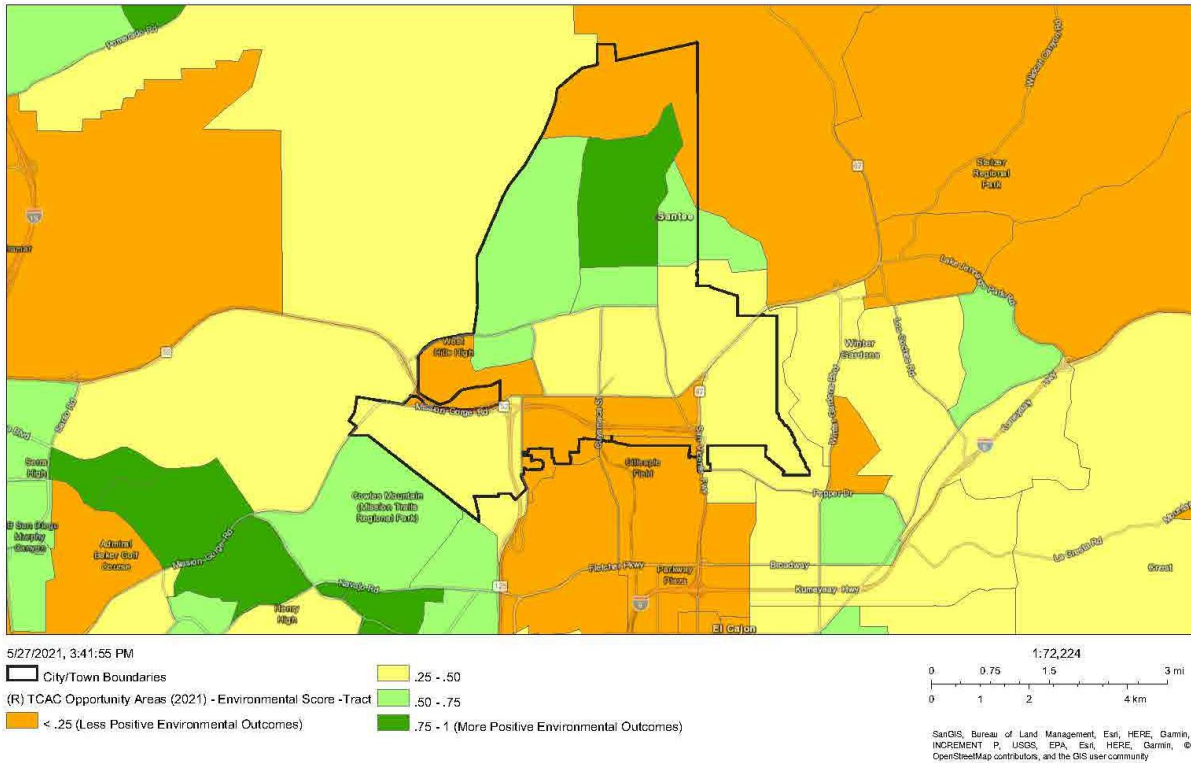


SanGIS, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap

Environment

The TCAC Environmental Score is based on CalEnviroScreen 3.0 scores. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Similar to economic scores, the TCAC’s environmental scores were lowest along the southern coast of the County and in the east county cities of El Cajon and La Mesa, indicating low environmental outcomes. Within the City, the lowest environmental scores were concentrated in two tracts South of Mission Gorge Avenue near the City’s downtown and a census tract in the Carlton Oaks neighborhood next to the downtown.

Figure E-19: TCAC- Environmental Score



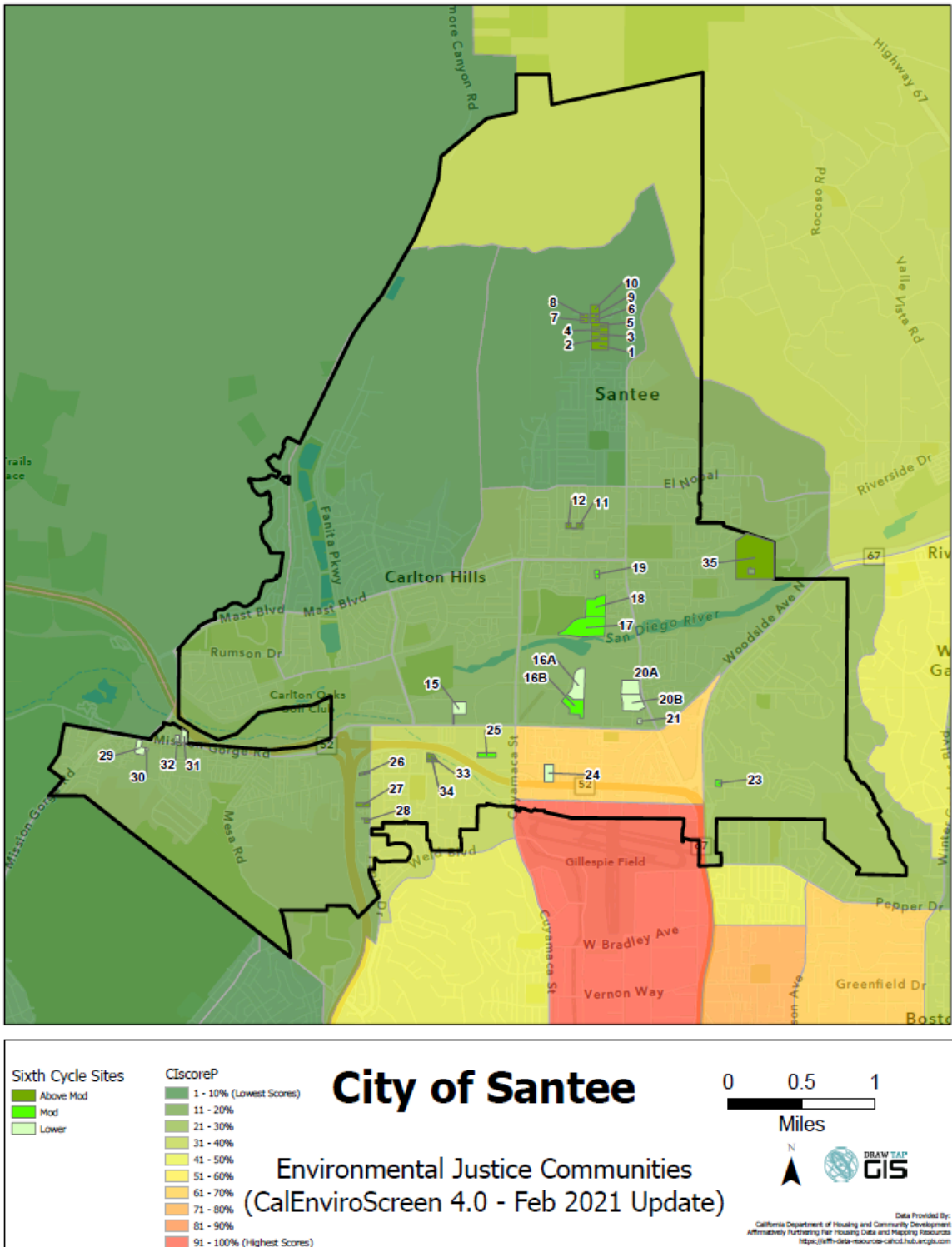
SanGIS, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI, U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Esri, HERE, Garmin, © OpenStreetMap

The February 2021 update to the CalEnviroScreen (CalEnviroScreen 4.0) shows even more differentiation between the two southernmost census tracts (Figure E-20). One census tract south of Mission Gorge Road has the highest (worst) score. Five percent of RHNA units are located in this tract. The units in this tract are also all lower income units, accounting for nine percent of the RHNA lower income units.

Table E-14: RHNA Units by CalEnviroScreen 4.0 Scores

CalEnviroScreen Score	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
1 - 10% (Lowest Score)	0.0%	0.0%	42.0%	5.9%
11 - 20%	91.4%	90.1%	52.9%	85.7%
21 - 30%	0.0%	2.9%	0.0%	0.8%
31 - 40%	0.0%	7.0%	5.1%	2.7%
41 - 50%	0.0%	0.0%	0.0%	0.0%
51 - 60%	8.6%	0.0%	0.0%	5.0%
61 - 70%	0.0%	0.0%	0.0%	0.0%
71 - 80%	0.0%	0.0%	0.0%	0.0%
81 - 90%	0.0%	0.0%	0.0%	0.0%
91 - 100% (Highest Score)	0.0%	0.0%	0.0%	0.0%
Total Units	1,228	587	295	2,110

Figure E-20: RHNA Unit Distribution by CalEnviroScreen 4.0 Score



5. DISPROPORTIONATE HOUSING NEEDS

The AFFH Rule Guidebook defines disproportionate housing needs as a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area (24 C.F.R. § 5.152). The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing.

Cost Burden

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Santee. Housing problems considered by CHAS include:

- Housing cost burden, including utilities, exceeding 30 percent of gross income;
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income;
- Overcrowded conditions (housing units with more than one person per room); and
- Units with physical defects (lacking complete kitchen or bathroom)

Santee households experience housing problems (38 percent) and cost burdens (36 percent) at lower rates than the County overall (45 percent and 41 percent) ([Table E-15](#)). As shown in [Table E-15](#), households of all minority races (Black, Asian, American Indian, Pacific Islander, and Hispanic) experience housing problems at a higher rate than White (37 percent) households and all households in the City (38 percent). Renter-households, independent of race, experience housing problems at higher rates than owner-occupied households, except for Pacific Islander and American Indian Households. Renters are also cost burdened at higher rates than owners, independent of race, except for Hispanic households, whose cost burden is similar for both owner and rented households.

Elderly and large households may also be subject to disproportionate housing problems. [Table E-16](#) shows that renter-elderly households experience housing problems and cost burden at greater rates (almost double) than all renter-households and all households in the City. About two thirds of elderly renter-households experience any housing problem and cost burdens. The similar rates of elderly renter households experiencing cost burden and housing problems 64 and 68 percent, suggest cost is an issue for all households with any problem.

Similarly, a greater percent of large households also experience housing problems and cost burdens compared to all households of the same tenure and all households in the City. However, whereas renter elderly households experience the highest rates of cost burden and housing problems, large households are most affected among owner-households. This suggests a need for large owner-housing units, and this trend is similar to that in the County, where a higher proportion renter elderly and owner large households experience housing problems, compared to all renters and all households.

Table E-15: Housing Problems by Race, Santee vs. San Diego County

Santee	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	Other	All
With Housing Problem								
Owner-Occupied	31.3%	18.7%	32.3%	90.0%	100.0%	38.4%	23.7%	32.2%
Renter-Occupied	53.2%	61.0%	71.9%	40.0%	42.5%	42.3%	35.9%	51.2%
All Households	37.1%	52.7%	45.1%	73.3%	48.9%	40.0%	30.3%	38.1%
With Cost Burden >30%								
Owner-Occupied	30.2%	18.7%	29.3%	90.0%	100.0%	33.6%	22.0%	30.5%
Renter-Occupied	52.7%	61.3%	63.8%	40.0%	43.8%	30.7%	29.0%	48.1%
All Households	36.1%	53.0%	40.4%	73.3%	50.0%	32.4%	25.8%	36.0%
San Diego County	White	Black	Asian	Am. Ind.	Pac Isl.	Hispanic	Other	All
With Housing Problem								
Owner-Occupied	31.2%	39.7%	33.6%	25.2%	31.5%	43.0%	35.6%	33.9%
Renter-Occupied	50.9%	62.3%	51.1%	52.0%	60.9%	67.1%	55.2%	57.1%
All Households	38.9%	55.4%	41.0%	38.0%	51.6%	57.7%	46.9%	44.8%
With Cost Burden >30%								
Owner-Occupied	30.4%	37.5%	30.6%	22.2%	0.0%	36.3%	34.1%	31.7%
Renter-Occupied	48.5%	58.9%	43.7%	46.1%	54.2%	58.2%	51.4%	52.0%
All Households	37.5%	52.3%	36.2%	33.6%	46.9%	49.7%	44.1%	41.2%
Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers. Source: HUD CHAS, (2013-2017).								

Table E-16: Housing Problems, Elderly and Large Households, Santee vs. San Diego County

Santee	Renter-Occupied			Owner-Occupied			All HHs
	Elderly	Large HH	All Renter	Elderly	Large HH	All Owners	
Any Housing Problem	68.0%	58.7%	35.5%	25.9%	40.9%	32.0%	38.1%
Cost Burden > 30%	64.0%	44.6%	35.0%	24.6%	33.2%	30.6%	36.0%
San Diego County							
Any Housing Problem	62.1%	79.6%	57.1%	33.8%	46.3%	33.9%	44.8%
Cost Burden > 30%	59.8%	56.0%	52.0%	33.5%	31.3%	31.7%	41.3%
Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers. Source: HUD CHAS, (2013-2017).							

In addition to renter households experiencing cost burdens at higher rates than owner households, renter cost-burden rates have increased between 2014 and 2019 from 44 percent to 48 percent. [Figure E-21](#) shows the concentration of renter cost-burdened households changing from the southernmost census tract south of Mission Gorge in the downtown to the census tracts north of San Vicente Freeway in the eastern side of the City. By contrast, the percent of cost-burdened owner households decreased during the same time period from 36 percent to 31 percent. These cost-burdened households are concentrated in the census tracts south of Mission Gorge Road at the southern end of the City.

[All lower and moderate income RHNA units are in tracts where 40 to 60 percent of renters overpay for housing. Of above moderate income RHNA units, 42 percent are in tracts where only 20 to 40 percent of renters are cost burdened, but 41.4 percent are in tracts where more than 60 percent of renters are cost burdened. Most units included in the City’s sites inventory are in tracts where fewer than 40 percent of owners are cost burdened, including 84 percent of lower income units, 93 percent of moderate income units, and 88 percent of above moderate income units.](#)

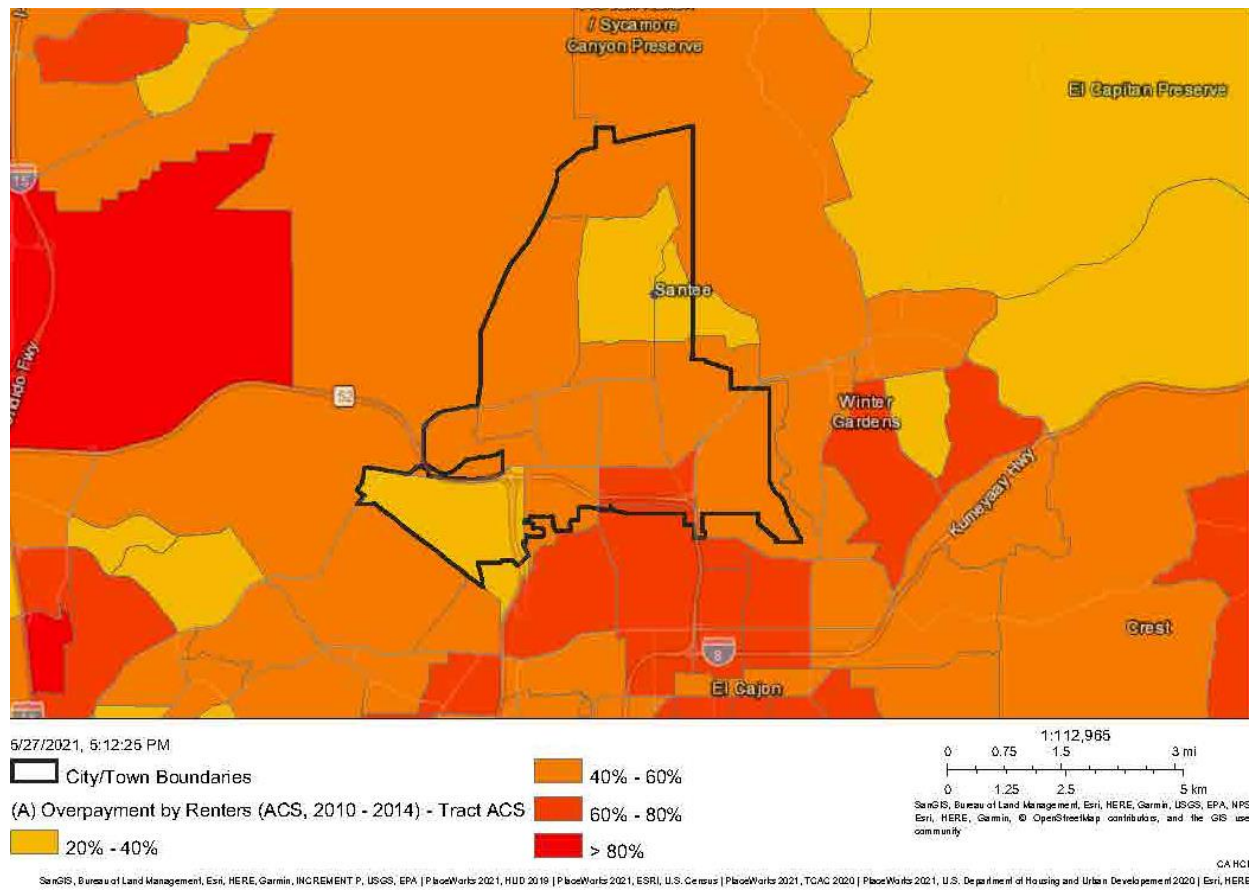
Table E-17: RHNA Unit Distribution by % Cost Burdened Renters

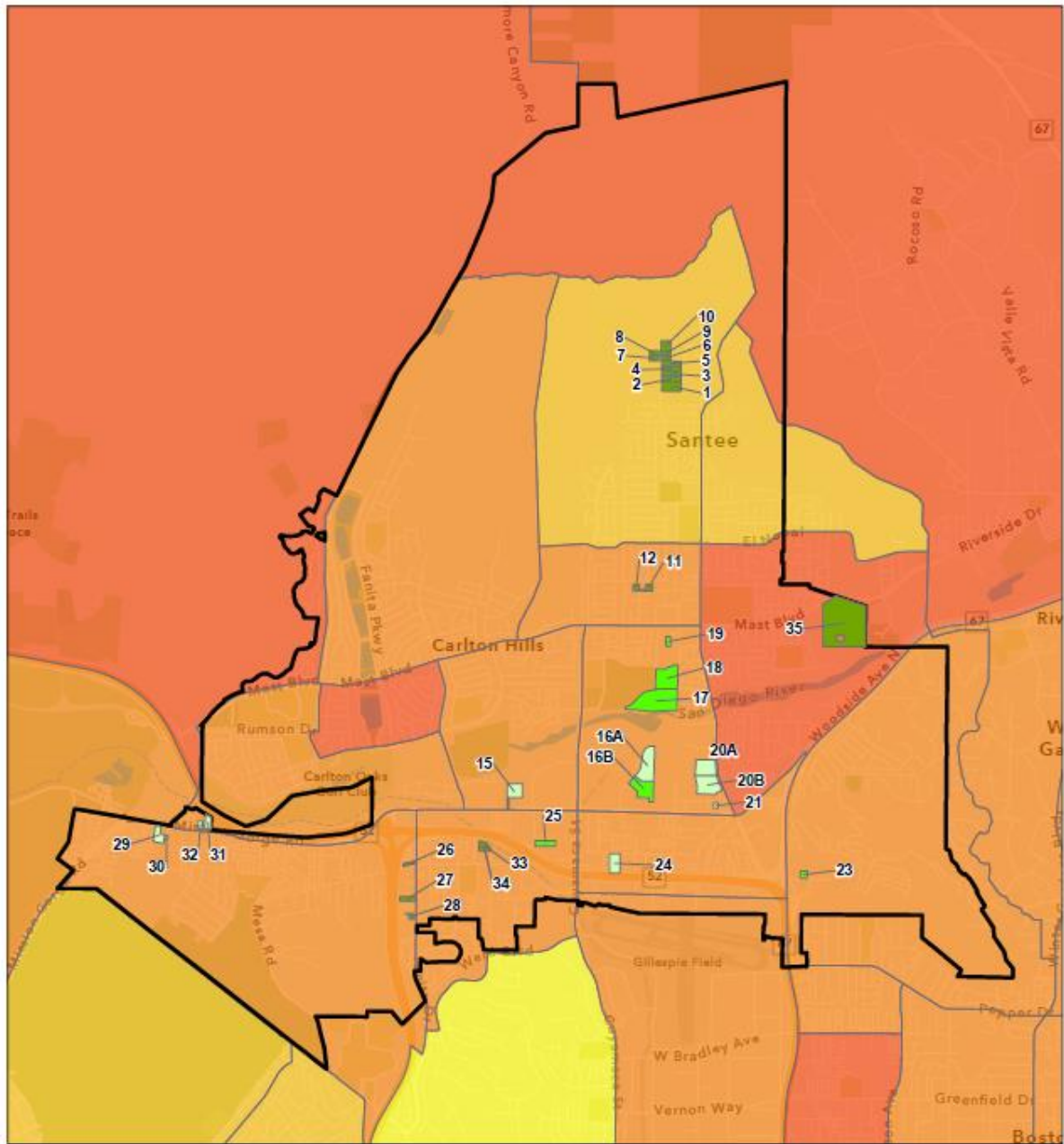
<u>% Cost Burdened Renters</u>	<u>Lower Income RHNA</u>	<u>Moderate Income RHNA</u>	<u>Above Moderate Income RHNA</u>	<u>Total RHNA Units</u>
<u>20-40%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>42.0%</u>	<u>5.9%</u>
<u>40-60%</u>	<u>100.0%</u>	<u>100.0%</u>	<u>16.6%</u>	<u>88.3%</u>
<u>60-80%</u>	<u>0.0%</u>	<u>0.0%</u>	<u>41.4%</u>	<u>5.8%</u>
<u>Total</u>	<u>1,228</u>	<u>587</u>	<u>295</u>	<u>2,110</u>

Table E-18: RHNA Unit Distribution by % Cost Burdened Renters

<u>% Cost Burdened Renters</u>	<u>Lower Income RHNA</u>	<u>Moderate Income RHNA</u>	<u>Above Moderate Income RHNA</u>	<u>Total RHNA Units</u>
<u>20-40%</u>	<u>84.0%</u>	<u>93.0%</u>	<u>88.1%</u>	<u>87.1%</u>
<u>40-60%</u>	<u>16.0%</u>	<u>7.0%</u>	<u>11.9%</u>	<u>12.9%</u>
<u>Total</u>	<u>1,228</u>	<u>587</u>	<u>295</u>	<u>2,110</u>

Figure E-21: Sites Inventory and Change in Cost-Burdened Renter Households, 2014 to 2019





Sixth Cycle Sites

- Above Mod
- Mod
- Lower

Cost Burden 2019 - Renter

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

City of Santee

Overpayment by Renters 2015-2019 ACS Tract Level

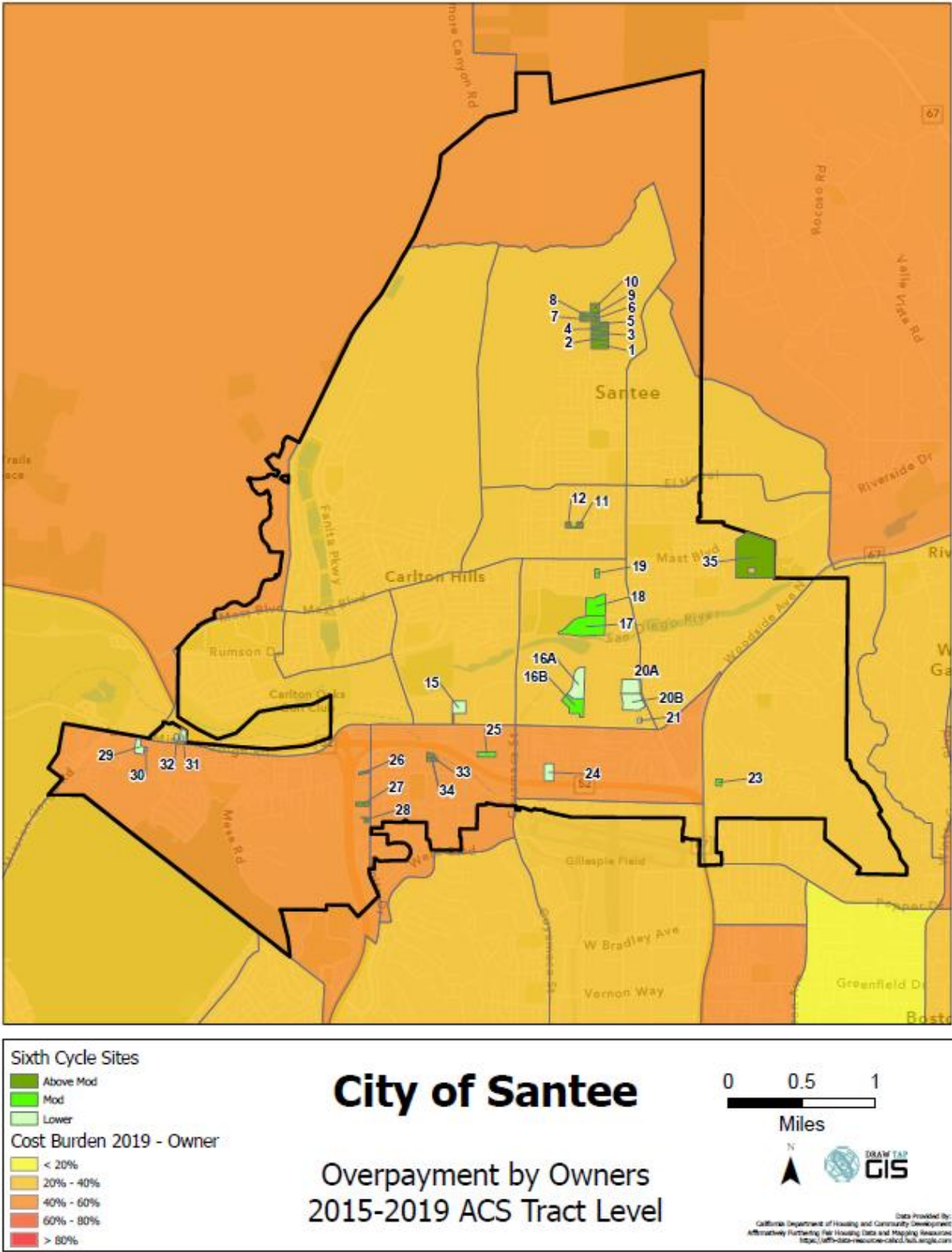
0 0.5 1

Miles



Data Provided by:
California Department of Housing and Community Development
Affirmatively Furthering Fair Housing Data and Mapping Resources
<https://affirmativefairhousing-cald.hcd.ca.gov/>

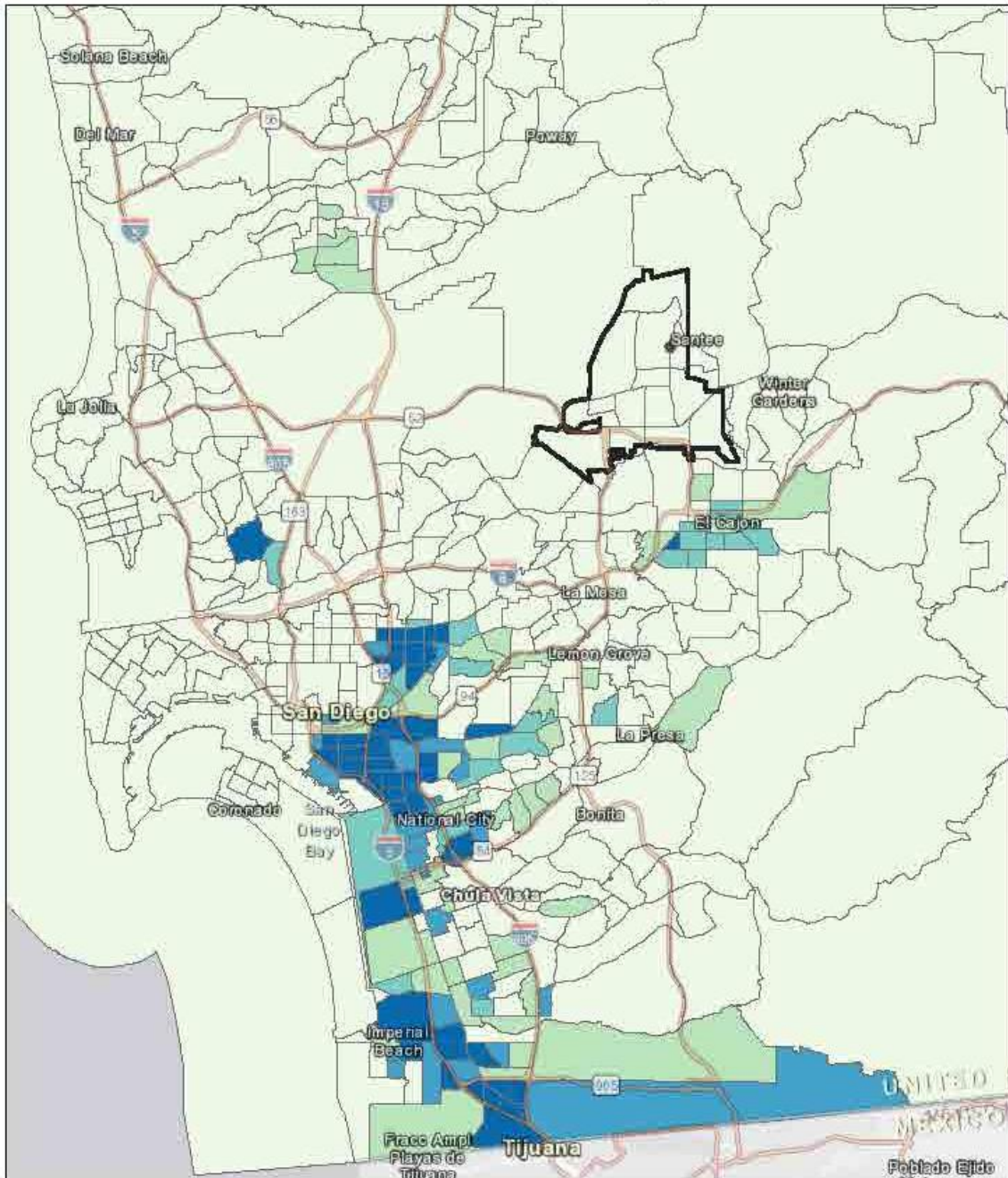
Figure E-22: Sites Inventory and Cost-Burdened Owner Households, 2019



Overcrowding

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). According to the 2018 five-year ACS estimates, a lower percentage of households in Santee (3.4 percent) are living in overcrowded conditions than the County (6.7 percent). [Figure E-23](#) shows that Santee's overcrowding rates are also lower than the statewide average of 8.2 percent. Within the City, overcrowded households are not concentrated within any particular census tract.

Figure E-23: Overcrowded Households



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- City/Town Boundaries
- 12.01% - 15%
- 15.01% - 20%
- > 20%
- ≤ 8.2% (Statewide Average)
- 8.3% - 12%

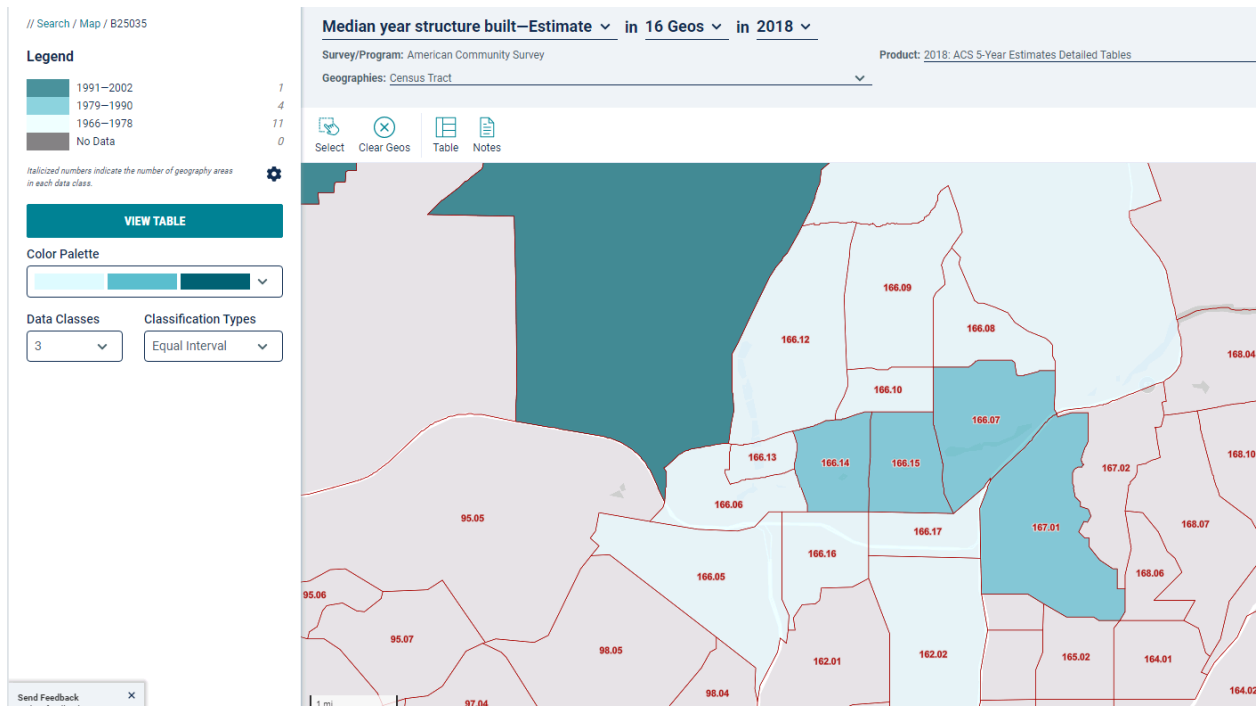
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Substandard Conditions

Housing that is 30 years or older is assumed to require some rehabilitation. Such features as electrical capacity, kitchen features, and roofs, usually need updating if no prior replacement work has occurred. Santee’s housing stock is older than the County’s; 80 percent of the City’s housing stock was constructed prior to 1990, while only 72 percent of the County’s housing stock is more than 30 years old (Table 8 in Community Profile). Despite the old housing stock, the City estimates that only about 0.05 percent of homes (10 units) in Santee are in substandard condition.

Nearly 88 percent of the City’s existing housing stock will exceed 30 years of age by the end of this Housing Element planning period (built before 2000). As shown in [Figure E-24](#), the median age of housing across most of the city is between 1966 and 1978. Housing in the central census tracts and in the East has a median age of 1979 to 1990.

Figure E-24: Median Year Housing Built

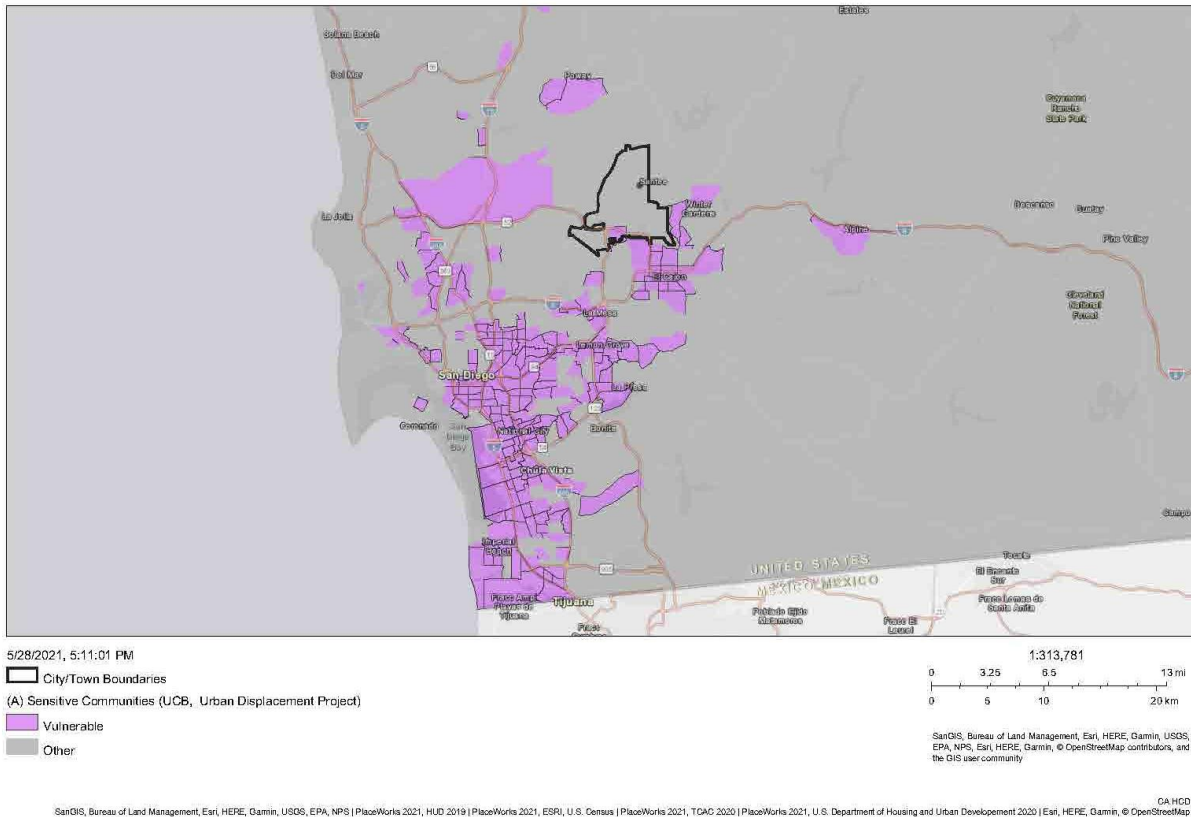


Displacement Risk

UCLA’s displacement project defines residential displacement as “the process by which a household is forced to move from its residence - or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control.” As part of this project, the UCLA team has identified populations vulnerable to displacement (named “sensitive communities”) in the event of increased redevelopment and drastic shifts in housing cost. They defined vulnerability based on the share of low income residents per tract and other criteria including: share of renters is above 40 percent, share of people of color is more than 50 percent, share of low income households severely rent burdened, and proximity to displacement pressures. Displacement pressures were defined based on median rent increases and rent gaps. Using this methodology, sensitive communities

are concentrated along the southern coast the City of San Diego, National City, Chula Vista and Imperial Beach and in Lemon Grove, La Mesa, and El Cajon in inland areas. Two census tracts in the southern end of Santee (south of Mission Gorge) are considered vulnerable. One of these tracts is mostly outside of Santee city limits and is shared with El Cajon (Tract 162.02).

Figure E-25: Sensitive Communities Map



6. OTHER RELEVANT FACTORS

Historical Pattern of Investment

Prior to 2012, redevelopment tax increment was the primary funding source for community improvements and affordable housing development. Pursuant to the redevelopment law, a minimum of 20 percent of the tax increment had to be set aside for affordable housing and the remaining 80 percent was to be used to eliminate blighting conditions, including economic blights. As such, most communities, including Santee, focused much of its tax increment financing (80 percent) on projects and improvements to foster economic development. Use of tax increment funds on improvements to primarily residential neighborhoods was limited.

With the elimination of redevelopment in California, CDBG funds became the only consistent source of funding for community development and neighborhood improvements, further compromising the City's financial capacity. CDBG funds can be spent to directly benefit LMI persons or LMI areas. Furthermore, CDBG program's LMI area benefit must focus on primarily

residential neighborhoods. The City will continue to focus CDBG funds on neighborhood improvements activities. To supplement CDBG funds, the City is pursuing a Section 108 loan to implement the Active Santee and the ADA Transition plans.

Lending Patterns

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent lending/credit crisis. In the past, credit market distortions and other activities such as “redlining” were prevalent and prevented some groups from having equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants. [Table E-19](#) examines detailed 2017 HMDA data for Santee and the County.

Hispanics were under-represented, making up only 11 percent of the City’s applicant pool but 18 percent of the City’s population. All minority races except Asians and Native Americans were also denied at higher rates than White applicants in the City. The denial rates for most minority races were also greater than the City’s overall denial rate of 14 percent. Similar trends were seen in the County- Hispanics were also greatly underrepresented in the applicant pool and denial rates were greater for minority applicants than White applicants.

Table E-19: Loan Applications and Denial by Race						
	Santee			San Diego County		
	% Applicant Pool	% Population	Denials	% Applicant Pool	% Population	Denials
White	66.2%	69.1%	12.7%	51.5%	46.2%	13.3%
Black	1.6%	1.9%	21.2%	3.1%	4.7%	19.9%
Hispanic	10.8%	18.1%	17.2%	16.4%	33.4%	17.5%
Asian	4.2%	5.2%	13.9%	9.7%	11.5%	14.8%
Native American	0.3%	0.5%	0.0%	0.3%	0.4%	20.4%
Hawaiian	0.8%	0.3%	18.8%	1.1%	0.4%	16.2%
Other	16.1%	4.9%	18.6%	17.8%	3.5%	16.0%
Total	100.0%	100.0%	14.0%	100.0%	100.0%	14.9%
Source: www.lendingpatterns.com, 2020. 2013-2017 ACS 5-Year Estimates.						

Mobile Homes

Mobile homes are a significant portion of Santee’s housing, making up 11 percent its housing stock. According to the 2020 Regional AI, this is the highest share of mobile units in the County. For the County overall, only 3.8 percent of housing units are mobile homes. Mobile homes also tend to be occupied by older residents with fixed incomes. In an effort to mitigate an observed failure in the market for mobile home rental spaces in which owners of relatively immobile coaches were found to be at a disadvantage in negotiating reasonable space rental terms, Santee adopted the Manufactured Home Fair Practices Ordinance in 1993. The ordinance limits increases in month-to-month space

rents according to a formula tied to the consumer price index for San Diego County. The ordinance does not seek to hold space rents to any standard of “affordability”. An annual adjustment in space rents is intended to allow space rents to rise in a controlled manner over time to provide a just and reasonable return on investment to park owners. The Santee Manufactured Home Fair Practices Ordinance regulates increases in space rent charged to owners of mobile homes in Santee whose rental agreements do not exceed 12 months in length.

Safety Element and Environmental Justice

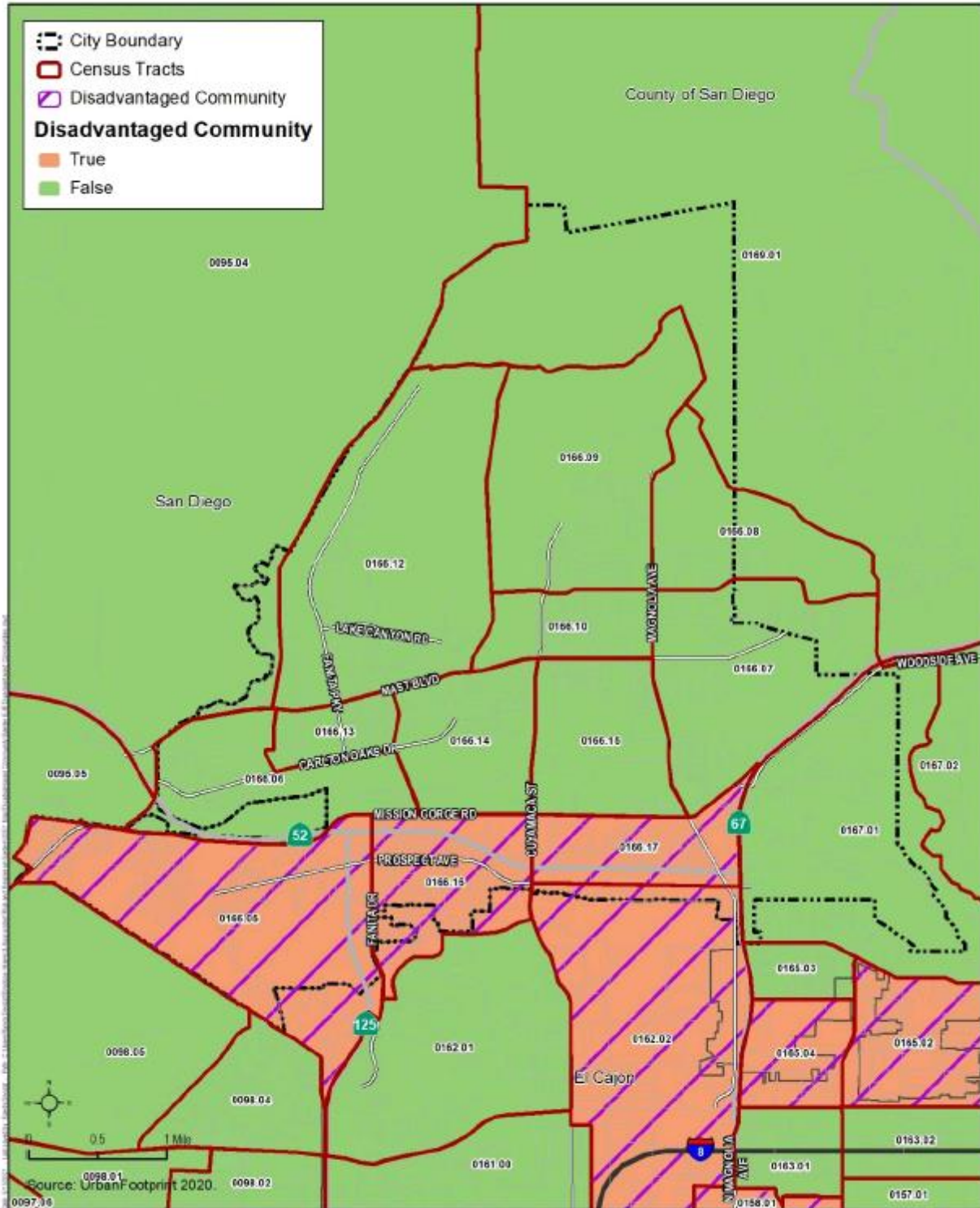
The City of Santee Department of Development Services began updating the Safety Element of the General Plan in 2021. The Safety Element will comply with new legislation requiring the general plan to address climate change adaptation and environmental justice policies for disadvantaged communities. The Environmental Justice (EJ) Element will determine how and where to prioritize environmental justice strategies, policies and programs to promote a more equitable community.

The first step in assessing conditions in support of the EJ Element was to identify disadvantaged communities. “Disadvantaged communities” (DACs) are defined as low-income areas that are disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation (California Government Code, Section 65302[h][4][A]). According to the California Environmental Protection Agency (CalEPA), disadvantaged communities are those disproportionately burdened by multiple sources of pollution and with population characteristics that make them more sensitive to pollution (CalEPA 2017). As a result, they are more likely to suffer from a lower quality of life and worsened health outcomes compared to areas that are more affluent. To identify disadvantaged communities, the City followed the OPR’s recommended screening method and identified a greater portion of the southwestern areas of the City as being within a disadvantaged community ([Figure E-26](#)). A summary of the existing conditions analysis of these disadvantaged communities with respect to each EJ Element topic is found in [Table E-20](#).

Table E-20: Environmental Justice Element Existing Condition Findings for Disadvantaged Communities	
Topic	Finding
Pollution Exposure	Disadvantaged communities experience greater exposure to air pollutants due to their proximity to high-traffic corridors and industrial activity. The pollution source that residents are most concerned about is the prevalence of trash and debris throughout the City, with many specifically pointing to homeless encampments along the river as a source of the pollution.
Access to Public Facilities and Services	Many residences in disadvantaged communities are not within walking distance to their nearest school. However, disadvantaged communities are generally within walking distance of daycare centers and transit, which can provide residents with opportunities to access other community services without using their personal vehicle.
Access to Healthy Food	Disadvantaged communities have slightly less access to healthy food outlets compared to other areas in the City and the County. Disadvantaged communities are not served by existing food distribution programs.
Access to Physical Activity and Recreation	Disadvantaged communities in the southeast portion of the City are considered relatively bikeable compared to other areas of the City; however, disadvantaged communities lack access to sidewalks that result

	in a higher number of transportation related collisions in disadvantaged communities.
Access to Safe, Sanitary, and Affordable Homes	Disadvantaged communities are more likely to live in older (and likely lower-quality) homes and spend a greater percentage of their income on housing compared to other areas on the City. High housing costs impact disadvantaged communities more severely, as they often include low-income residents. Survey respondents were much more concerned with housing affordability than the safety and quality of homes.

Figure E-26: Environmental Justice Element Disadvantaged Communities



Active Transportation Plan

The Active Santee Plan (ASP) is the City of Santee's Active Transportation Plan and was adopted in January 2021. Three critical overall issues were identified for consideration during plan preparation: 1) the community desires a comprehensive bikeway and walkway system that provides a network of facilities throughout the City, 2) the community considers gap closure as a top priority for the plan, and 3) as the community grows, the bikeway and walkway system should be extended and integrate new developments.

Based on the gap analysis and prioritization of projects, the ASP proposed a bicycle network that includes approximately 16 miles of new bikeway facilities throughout the City, in addition to the 50 miles already in place. One key aspect of this Plan is the completion of San Diego River Trail, which will provide an east-west corridor through the center of the City and add a Santee link into the regional bikeway system, connecting Lakeside and San Diego. The 2021 Active Santee Plan also developed the first Santee comprehensive pedestrian master plan. The proposed pedestrian network includes approximately 24 miles (126,000 feet) of new sidewalks throughout the City, in addition to the 201 miles already in place. The proposed facilities also include 124 new pedestrian ramps and 31 retrofitted ramps to be ADA compliant. The main purpose of the facilities is to fill the gaps in the existing system to provide a complete pedestrian network throughout the city. [Figure E-27](#) shows that the majority of these priority upgrades are located in the southern census tracts of the City.

Many of the proposed improvements identified in the Active Santee Plan are also included in the City's adopted Fiscal Year 2020-2024 Capital Improvement Program, such as the Safe Routes to Schools Program, and the Citywide Sidewalk Program. The Active Santee Plan provides cost estimates which may be applied to updates to the Capital Improvement Program, and, as a requirement for grant applications, allows potential state and federal grant sources to be applied.

ADA Transition Plan

The development of an ADA Transition Plan is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which require that all organizations receiving federal funds make their programs available without discrimination to persons with disabilities. The Transition Plan (also known as a Program Access Plan) identifies physical obstacles that limit the accessibility of facilities to individuals with disabilities, describes the prescribed methods to make the facilities accessible, provides a schedule for making the access modifications, and identifies the public officials responsible for implementation of the Transition Plan. The City plans to update its Transition Plan within the Sixth Cycle Planning period. The plan will identify deficiencies in the City and will use [CDGB and General City](#) funds to repave streets and install wheelchair accessible curves.

Figure E-27: Active Santee Project Prioritization Areas

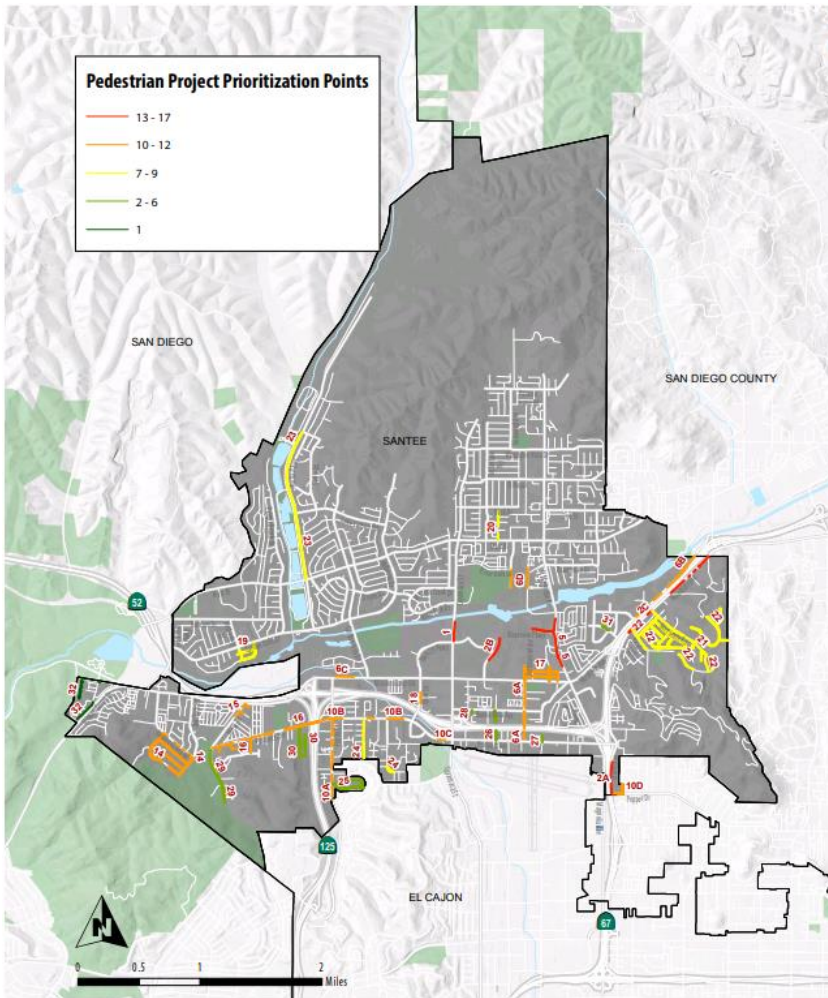


Figure 5.1 Sidewalk Infill Prioritization Results

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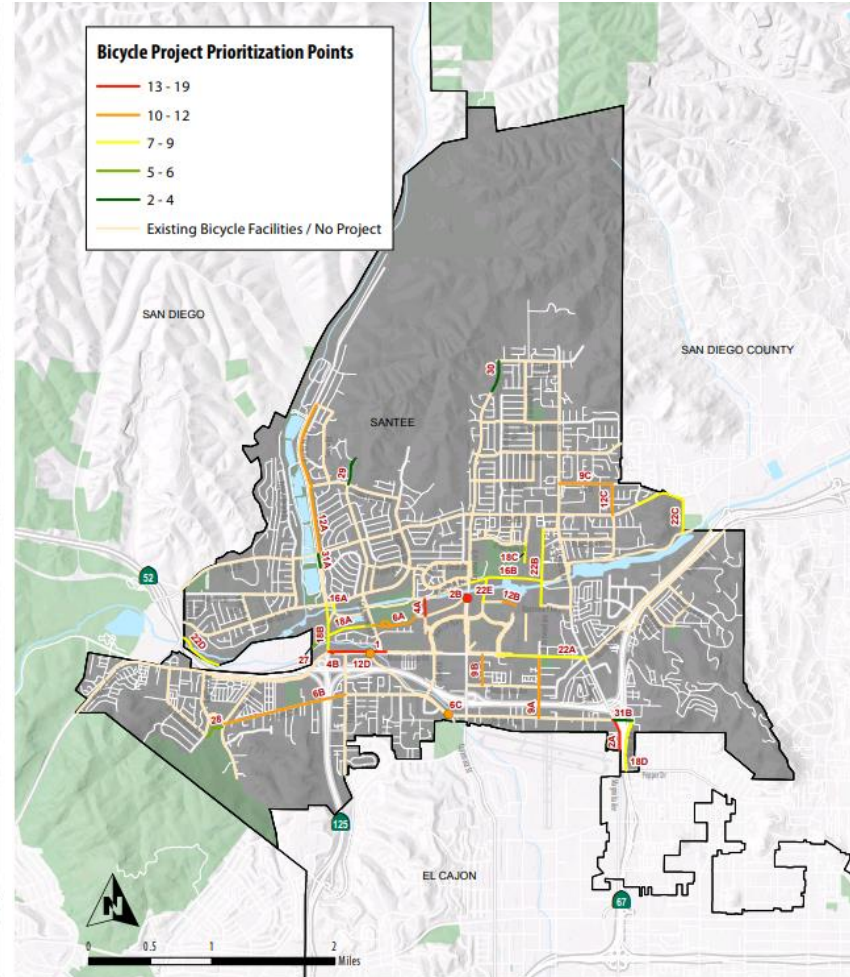


Figure 5.2 Bicycle Project Prioritization Results

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Governmental Constraints for Special Needs Housing

Santee’s special needs populations is comparable to the County’s. Senior-headed households and persons with disabilities make up the largest special needs populations in the City (Table E-21). The 2020 Regional AI found governmental constraints that hinder housing choice for special needs groups, particularly non-compliance with state law related to accessory dwelling units, Low Barrier Navigation Centers (LBNC), emergency shelter capacity and parking standards, and transitional and supportive housing, and affordable housing streamlined approval. Details of the constraints are found in the Governmental Constraints of the Housing Element.

Table E-21: Special Needs Groups

Special Needs Group	Santee		San Diego County	
	#	%	#	%
Senior-Headed Households (65+)	4,826	24.6%	249,767	22.3%
Single-Parent Households	1,634	8.3%	124,701	11.1%
Female-Headed Households with Children	1,072	5.5%	66,423	5.9%
Large Households	1,843	9.4%	132,588	11.8%
Persons with Disabilities	5,964	10.8%	314,897	9.8%
Agricultural Workers ¹	13	0.0%	13,471	0.9%
Students ²	4,019	7.0%	296,600	9.0%
Homeless	25	0.0%	7,619	0.2%

1. Category includes civilians employed in the "agriculture, forestry, fishing and hunting, and mining" industry as reported in the ACS.
2. Population enrolled in college or graduate school
Source: Census, ACS, 2014-2018; and Regional Task Force on the Homeless, 2020.

7. SITES INVENTORY

As discussed previously, only a small portion of Santee, located in the southern area of the City north of Mission Gorge Road and bounded by Cuyamaca Street and N. Magnolia Avenue, has non-White populations exceeding 40 percent. This area also has slightly higher concentrations of children living in single-parent female-headed households. A larger proportion of lower and moderate income RHNA units are located in this part of Santee compared to above moderate income units. However, despite the concentrations of special needs groups, this section of the City is considered high resource area with ample economic, education, and transportation opportunities and fair environmental conditions.

Compared to jurisdictions north and east of the City, Santee has more tracts with populations of persons with disabilities exceeding 10 percent. Approximately 50 percent of the City’s mobile home parks are in tracts where 10 to 20 percent of the population has a disability. Mobile home parks are often occupied by seniors on fixed incomes, who may also have a disability. Lower and moderate income units are not disproportionately located in tracts with larger populations of persons with disabilities; 91 percent of lower income units and 90 percent of moderate income units are in tracts where less than 10 percent of the population experiences a disability.

There is only one LMI area in the City where more than 50 percent of households are low or moderate income. The selected RHNA sites do not exacerbate household income segregation. There are no lower income units in block groups where more than 50 percent of households are LMI. Further, only 7 percent of moderate income units and 5 percent of above moderate income units are in an LMI area. Neighborhood improvement is the focused efforts in the LMI area.

As stated previously, a majority of lower and moderate income units are in high resource tracts with positive economic, education, environmental, and transportation outcomes. While the City does contain low resource tracts, none of the sites selected to meet the RHNA are in these areas.

There are two sensitive communities at risk of displacement in Santee, one of which is mostly within the neighboring City of El Cajon. There are no lower income RHNA units in this vulnerable community. Further, only 7 percent (41 units) of moderate income units are in this tract. The City's RHNA strategy does not disproportionately locate LMI households in areas of high displacement risk. Similarly, the City's sites inventory does not include any lower or moderate income units in areas where more than 60 percent of renters overpay, and a majority of RHNA units are in tracts where fewer than 40 percent of owners overpay.

C. Fair Housing Issues, Contributing Factors, and Meaningful Actions

1. FAIR HOUSING ISSUES

#1 Insufficient fair housing testing and limited outreach capacity

While fair housing testing is part of the scope of work for the Fair Housing provider, only two tests were reported between 2015 and 2020 in the 2020 San Diego Regional Analysis of Impediments for Fair Housing. Additionally, the City has budgeted additional CDBG funds for more frequent testing from its fair housing provider. Fair housing provider reports to the City do not include fair housing testing reports, but will be requested during the Sixth Cycle Housing Element planning period

Outreach capacity is limited due to the meeting times. Meetings are usually held during the day. While the fair housing provider is responsible for setting up the meetings and workshops, the City will work with the fair housing provider on a plan to evaluate and improve outreach capacity (in terms of attendance).

Contributing Factors

Lack of monitoring
Lack of a variety of media inputs
Lack of marketing community meetings

#2 Segregated living patterns with a concentration of special needs groups in the southern census tracts of the city

The analysis found that there is a concentration of special needs groups (persons with disabilities, low and moderate-income households, children in families or single female-headed households) in lower resource (moderate) areas. These census tracts were also identified as “disadvantaged communities”

using the OPR's screening methodology for the Environmental Justice Element. These tracts are near the downtown and allow for a variety of land uses but are dominated by shopping center uses, single-family residential, and mobile homes. These mobile homes tend to be occupied by senior residents.

Contributing Factors

Location and type of affordable housing- HCV use concentrated
Land use - Mobile home park land use, usually occupied by senior residents
Proximity to shopping centers and transit

#3 Displacement risk in areas with disproportionate housing needs with special needs populations

Census tracts with both renters and owners experiencing cost burdens at the highest rate are located in the southernmost census tracts of the City. These census tracts also have a high concentration of mobile homes and HCV use, and are known to have a high population of senior households. The Urban Placement project identified one of the two census tracts with these problems as a sensitive community, and thus at risk of displacement.

Contributing Factors

Land use - Mobile home park land use, usually occupied by senior residents
Displacement risk due to economic pressures
Increasing rents
HCV use concentration