



September 15, 2020

Mr. Joseph Smith, AICP
Director, Planning & Community Development
City of Del Mar
1050 Camino del Mar
Del Mar, CA 92014
Submitted via email: jsmith@delmar.ca.us

Re: Draft 6th Cycle Housing Element

Dear Mr. Smith:

On behalf of the San Diego Housing Federation, we are writing to provide comments and feedback on the draft 6th Cycle Housing Element for the City of Del Mar.

The draft Housing Element contains several actionable items that will help Del Mar make progress toward meeting its housing goals. We applaud these components of the draft Housing Element and would like to make some additional recommendations to strengthen the plan's impact on achieving housing goals.

Implementing State Legislation

The San Diego Housing Federation is a proud co-sponsor of AB 1486, a bill that strengthened and clarified the state's Surplus Land Act. City implementation of this bill will advance Housing Program 1H (Chapter 4 – 9) to provide opportunities for low and moderate income housing throughout the city. We applaud the city's goal to amend the Public Facilities (PF) Zone to allow for residential development on City-owned properties. Identifying unused City-owned sites for housing can help to ensure the City is compliant with the State Surplus Land Act and helps support the development of affordable housing.

We are pleased to see Housing Program 1G (Chapter 4 – 7) included in this plan to update the City's Density Bonus Ordinance. We recommend that the City move quickly to implement AB 1763, a bill we supported which provides a density bonus for developments that are 100 percent affordable, to serve as a tool for building affordable housing. The City should also closely monitor AB 2345, a bill we are supporting that would build on the success of the City of San Diego's Affordable Homes Bonus Program (AHBP) by taking the program statewide. A report by Circulate San Diego, "[Equity and Climate for Homes](#)," found that 63 percent of AHBP projects were located in high and highest resource census tracts, demonstrating the program's role in affirmatively furthering fair housing. AB 2345 has passed the legislature and is pending

signature by the Governor. Should the bill be signed, this could serve as a valuable tool to achieve the City's housing goals.

Local funding for affordable housing

The draft Housing Element recognizes the need for funding to build housing that is affordable to low-income individuals and families. As is recognized throughout the draft Housing Element, federal and state funding is a critical piece to the resources puzzle. We recommend that the Housing Element specifically include a goal to prioritize funds made available through the Permanent Local Housing Allocation (PLHA), also known as the Building Homes and Jobs Act ([SB 2, 2017](#)), for the development of deed-restricted affordable housing. Maximizing the use of these funds to build housing for extremely low-, very low-, and moderate income households will help the City meet its RHNA obligations. Additionally, as local gap financing is critical, we encourage the City to consider dedicating former redevelopment funds, sometimes called "boomerang funds," as a local source of funding for affordable housing.

Affirmatively furthering fair housing and equity

As noted in the housing element, all census tracts in the City are shown on the 2019 Tax Credit Allocation Committee's Opportunity Map as areas of highest or high resource (Chapter 3 – 60) and the city is predominantly White with the White population comprising 91 percent of the City's population (Chapter 2 – 4). It is also noted that patterns of racial and ethnic concentration exist in the region (Chapter 3 - 64). The City of Del Mar should take the opportunity in its Housing Element to recognize the role that the City has played in segregation on a regional level. In particular, constraints on increasing housing supply such as the City's Historic Preservation Overlay (HPO) Zone and height limits should be examined for their role in creating exclusion.

We recommend that the City review the California Department of Housing and Community Development (HCD) 2020 Analysis of Impediments to Fair Housing Choice and include the recommendations and actions outlined in the report. We additionally recommend that the City work with HCD on AFFH recommendations as they relate specifically to Housing Elements and incorporate those recommendations in the plan.

Housing and Climate Change

Our September 2016 report, "[Location Matters: Affordable Housing and VMT Reduction in San Diego County](#)," found that lower-income households are more likely to live in transit-rich areas, own fewer cars, are likely to live in larger building and smaller units, all factors that make affordable housing near transit a key greenhouse gas reduction strategy. In addition, the City's Climate Action Plan includes a goal to increase mass transit ridership. Currently, the draft Housing Element makes no mention of dense, deed-restricted affordable housing as a greenhouse gas reduction tool. We urge the City to examine the role of affordable housing in helping the City to meet both its RHNA obligations and its Climate Action Plan goals.

We thank you for consideration of our feedback and comments. We appreciate the time and effort that Planning Department staff have dedicated to the draft Housing Element document and look forward to supporting the City of Del Mar in adopting a robust plan that will help to meet the City's housing goals.

Sincerely,



Laura Nunn
Director of Policy & Programs