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July 13, 2021

Navy OTC Revitalization EIS Project Manager  
Attn: Ron Bochenek  
750 Pacific Highway, Floor 12  
San Diego, CA 92132-0058

**Re: Navy Old Town Revitalization EIS**

Dear Mr. Bochenek:

On behalf of the San Diego Housing Federation, I am writing to submit comments on the Draft Environmental Impact Statement for the Navy Old Town Campus Revitalization. Founded in 1990, the San Diego Housing Federation serves as the collective voice of those who support, build, and finance affordable housing in the San Diego region. We are supportive of the Navy's Preferred Alternative (Alternative 4) to build high density housing with a transit center and we urge the Navy to require a minimum of 20 percent of the housing units built to be deed-restricted affordable housing for low-income households.

The proposed project is ambitious in size and scale and will have a positive impact toward helping meet San Diego's housing needs. For the 6<sup>th</sup> Cycle Regional Housing Needs Assessment, the San Diego region has an allocated housing need of 171,685 units, the majority of which are needed in the City of San Diego with an allocation of 108,036 units.<sup>1</sup> With the 14,364 units proposed in Alternative 4, this project would have a significant impact in meeting regional housing need. However, the proposed plan does not specifically require that a percentage of these units be dedicated as deed-restricted affordable housing for very-low and low-income households who are most impacted by housing cost burden.

According to the most recent data from California Housing Partnership's San Diego County 2021 Affordable Housing Needs Report, 81 percent of extremely low-income households are paying more than half of their income on housing costs and there is a shortfall of 132,298 homes affordable for low-income renters.<sup>2</sup> We ask that the Navy consider the potential for this project to relieve that shortfall by requiring a minimum of 20 percent of the new housing built on this site be affordable for low-income households. A requirement at this level has been achievable in

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<sup>1</sup> 6<sup>th</sup> Cycle Regional Housing Needs Assessment Plan,  
[https://www.sandag.org/uploads/projectid/projectid\\_189\\_27782.pdf](https://www.sandag.org/uploads/projectid/projectid_189_27782.pdf), page 4.

<sup>2</sup> California Housing Partnership San Diego County 2021 Affordable Housing Needs Report,  
[https://www.sandag.org/uploads/projectid/projectid\\_189\\_27782.pdf](https://www.sandag.org/uploads/projectid/projectid_189_27782.pdf), page 2.

the North City Future Urbanizing Area<sup>3</sup> and we believe that a project of this scale can make such a requirement feasible, especially when paired with density bonuses and other incentives.

In addition to new housing, Alternative 4 proposes an on-site transit center that would enhance the regional transportation system. At the same time, the draft EIS notes “vehicle trips generated by OTC would be the largest contributor to the CO<sub>2</sub>e emissions.”<sup>4</sup> 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, and are likely to live in larger multifamily buildings, all factors that make affordable housing near transit a key greenhouse gas reduction strategy.<sup>5</sup> For this reason, the Navy should require deed-restricted affordable housing as a part of this project to help reduce its GHG impact.

We thank you for consideration of our feedback and comments. The Navy Old Town Campus Revitalization project offers a rare and unique opportunity to greatly contribute to housing needs in the City of San Diego and we look forward to seeing a robust plan that includes homes affordable for low-income individuals and families.

Sincerely,



Laura Nunn  
Chief of Policy & Education

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<sup>3</sup> North City Future Urbanizing Area Framework Plan, [https://www.sandiego.gov/sites/default/files/legacy/planning/community/profiles/ncfua/pdf/nfcu\\_final\\_102314.pdf](https://www.sandiego.gov/sites/default/files/legacy/planning/community/profiles/ncfua/pdf/nfcu_final_102314.pdf), page 99.

<sup>4</sup> Draft Environmental Impact Statement for Navy Old Town Campus Revitalization, <https://navwar-revitalization.com/assets/uploads/47%20-%20Navy%20OTC%20Draft%20EIS%20MAY%202021.pdf>, page 3-26.

<sup>5</sup> Location Matters: Affordable Housing and VMT Reduction in San Diego County, <https://static1.squarespace.com/static/5a6bd016f9a61e52e8379751/t/5a80f33bec212d81181be01d/1518400319715/Climate+Action+-+Affordable+Housing+And+VMT+Reduction.pdf>, page 7.