



May 17, 2021

County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Via Email: PDS.advanceplanning@sdcounty.ca.gov

Subject: Climate Action Campaign's recommendations for the County's 6th Cycle Housing Element

Dear Planning and Development Services Department,

Climate Action Campaign (CAC) is a non-profit organization based in San Diego and Orange County with a simple mission: stop the climate crisis through effective policy action.

California is the wealthiest state in the most affluent country in the world, yet, it is unable to provide adequate and affordable housing to its residents, forcing thousands to live in the streets or flee to other states. As of January 2019, [27%](#) of people experiencing homelessness in the entire United States are in California.

To stop the housing emergency once and for all, regional leaders must immediately enact policies that increase the production and preservation of affordable housing in strategic areas near transit and jobs. CAC therefore provides the following policy recommendations:

Equitable Development of Housing Near Jobs and Transit

CAC supports policies and programs that create more equitable and sustainable housing near transit. Affordable housing near transit is a key climate solution. By allowing people to live closer to jobs, schools and other amenities we can reduce emissions from car travel and promote healthier lifestyles, improving everyone's quality of life. We make the following recommendations to incentivize smart growth in transit priority areas:

- Eliminate single family zoning in transit priority areas and future transit stops;
- Provide inclusive housing along transit corridors and in transit priority areas;
- Secure active transportation infrastructure to induce mode shift towards sustainable modes like biking and walking.

Prioritize VMT-Efficient Areas in Alignment with State Climate Law

In June of 2020, the Board of Supervisors adopted a Transportation Study Guide (TSG) for SB 743 implementation that is inconsistent with state guidance, and revising the TSG is necessary to achieving state-mandated emissions reduction targets.

When defining “VMT-efficiency,” we urge you to follow the Governor’s Office of Planning and Research (OPR) recommended threshold of 15 percent below regional average VMT, as opposed to using the current unincorporated County average.¹ For the Housing Element, we urge you to select as many sites as possible in VMT-efficient areas, according to OPR’s recommended threshold.

Preserve and Increase Affordable Housing

In alignment with Goal H-4 of the Housing Element Update, CAC supports policies that help improve and preserve existing affordable housing, as well as strategies that encourage the redevelopment of deteriorating housing units. We recommend the County advance partnerships with federal agencies like HUD that provide grants, tax credits, and other support for housing preservation. Well-maintained, safe housing is crucial to help San Diego residents remain in their neighborhoods.

The County must take into consideration the effects that increasing housing prices and restrictive zoning codes have on low-income residents. Creating inclusive communities, where residents of all income levels live, can be achieved through these solutions:

- Inclusionary housing: The County must Implement inclusionary and mixed use zoning such as the development of “missing middle housing” that includes duplexes, triplexes, quads, row houses, multifamily units, storied apartment buildings, and ADU’s, all of which must be available to low-to-middle income households, including first-time buyers. This involves transitioning from conventional zoning codes that limit the height of new buildings to “Form- Based Codes”, a regulation that encourages mixed use and relies on design concepts intended to preserve the assets and characters of a community.
- On-site Affordable Housing: The County should mandate on-site affordable housing units for nearly all new housing projects. As well as increase the percentage of required on-site affordable housing units for new housing developments.
- Avoid Sprawl Development: The County must stop directing resources to sprawl development in high-fire risk hazard zones and instead increase affordable housing through infill projects on County owned land. By preventing sprawl in fire prone areas, the County will save millions of dollars in property damage during wildfire seasons.

Eliminate Building Emissions through All-Electric Homes

Even as our cities achieve 100% clean electricity, methane gas remains the third largest source of emissions in our cities and a dangerous indoor air pollutant. To fully transition away from fossil fuels, we must identify strategies to reduce and ultimately eliminate methane gas consumption. Cities in California are leading the transition from gas to clean-energy buildings, with San Jose, Santa Monica, Carlsbad, and over 40 other California cities passing building electrification ordinances and reach codes. The county should include tangible, specific targets, and associated strategies to reach 100% electrification of all municipal, commercial, and residential buildings. We recommended that the County also offer incentives for building and home

¹ https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

electrification projects that create safe and healthy homes powered by clean energy and free of dangerous methane gas.

Implement Anti-Displacement Strategies to Protect Residents in Communities of Concern

Many struggling San Diegans face challenges such as sudden rent hikes and wrongful evictions, both of which can lead to homelessness and displacement. The CAC team supports policies and best practices that can end the housing crisis and help residents navigate these challenges. We recommend the County to advance tenant protection policies by:

- Establishing Tenant Protection Boards and jurisdiction-wide Rent Registry systems: The establishment of Tenant Protection Boards aligns with AB 1482 Tenant Protection Act of 2019, which prohibits landlords from terminating a tenancy without just cause. Similarly, a rent registry can help enforce AB 1482, by helping track evictions and rent prices.

In addition to advancing tenant protection policies, decision makers must ensure that infrastructure and real estate development do not force residents into displacement. This can be accomplished through:

- Government collaboration with Community Land Trusts (CLTs): CLTs are non-profit organizations that work together with many community partners, including city governments, housing developers, and other non-profits to secure land that affordable housing can be built on. City governments can support the CLTs by establishing policies that facilitate CLT land acquisition and provide funding and technical assistance.

Conclusion

Thank you for the opportunity to provide comment on the County's housing element update. Please know that we are available as a resource and partner throughout the development of this important document.

Sincerely,

Madison Coleman
Policy Advocate
Climate Action Campaign

Brenda Garcia Millan
Researcher and Policy Analyst
Climate Action Campaign

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Policy Advocate
Climate Action Campaign

California Department of Transportation

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May 10, 2021

11-SD-VAR
PM VAR
Housing Element for General Plan

Mr. Michael Madrid
Planning and Development Services Department
County of San Diego
5510 Overland Ave., Suite 130
San Diego, CA 92123

Dear Mr. Madrid:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the public comment period for the General Plan Housing Element located near Interstates 5, 8, 15 (I-5, I-8, I-15) and State Routes 52, 54, 67, 76, 78, 79, 94 (SR- 52, SR-54, SR-67, SR-76, SR-78, SR-79, SR-94). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promote a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the County of San Diego is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change targets, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the County to evaluate potential Complete Streets projects.

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

Environmental

Should future projects based upon the changes enacted from the General Plan have elements and/or mitigation measures that affect Caltrans Right-of-Way, Caltrans would welcome the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA).

Right-of-Way

Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.

Mr. Michael Madrid
May 10, 2021
Page 3

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 985-1587 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

Maurice A. Eaton

MAURICE EATON
Branch Chief
Local Development and Intergovernmental Review

June 8, 2021

San Diego County Planning Commission
5510 Overland Avenue, Suite 110
San Diego, CA 92123
Submitted via email: Ann.Jimenez@sdcounty.ca.gov

Re: Draft 6th Cycle Housing Element

Dear Planning Commissioners:

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 County of San Diego.

The draft Housing Element contains several actionable items that will help the County of San Diego make progress toward meeting its housing goals. In particular, the County's policy proposals for preservation of at-risk housing, programs for addressing disproportionate needs and protecting residents from displacement, and review of land use designation to allow for diversity of building type are noteworthy. 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 was 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 Policy H-6.3 to facilitate the development of affordable housing on County-owned surplus properties (p. 43). Identifying unused County-owned sites for housing can help to ensure the County is compliant with the State Surplus Land Act and helps support the development of affordable housing.

We are pleased to see the Housing Element recognize changes to state Density Bonus law since the 5th Cycle (p. 22). We recommend that the County 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 County should also include in the Housing Element and work to implement AB 2345, a bill we supported that builds 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.

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 and that 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. The County could dedicate these funds to the Innovative Housing Trust Fund and leverage these dollars as local funding to seek additional Local Housing Trust Fund grants from the state. Maximizing the use of these funds to build housing for extremely low-, very low-, and moderate income households will help the County meet its RHNA obligations.

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. Additionally, as the County considers an Inclusionary Ordinance (H-1.9, p. 40), the County should examine how an adequately set in-lieu fee could provide a local source of revenue for affordable housing while also providing an alternative means of compliance as required by [AB 1505](#) (Bloom, 2017).

Affirmatively furthering fair housing and equity

As noted in the housing element, 72 percent of the housing units in the unincorporated area in 2018 were single-family homes (p. A-37). The housing element also acknowledges “the County has very little land that is designated for higher-density residential land uses” at approximately 0.19 percent of the unincorporated County’s total area (p. B-10). The plan acknowledges “this lack of land designated for higher densities that may accommodate moderate- to low-income housing units is a constraint on production” (p.B-10).

The California Department of Housing and Community Development (HCD) Guidebook for Affirmatively Furthering Fair Housing cites predominance of single family uses as an example of zoning and land use barriers ([AFFH Guidance](#), p. 26). The guidance also encourages rezoning and density bonuses as approaches to comply with AFFH goals. The County’s Housing Element includes policies to encourage development intensity relative to permitted density (H-1.2, p. 39), provide opportunities for senior and affordable housing (H-1.5, p. 39), and provide opportunities for a variety of housing types including multi-family building in Villages (H-1.6, p. 39). The County should work quickly to enact these policy proposals and to amend the County’s Zoning Ordinance accordingly.

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. As the County works to adopt its Housing Element and begin drafting an updated Climate Action Plan, the Housing Element should recognize dense, deed-restricted affordable housing as a greenhouse gas

reduction tool. We urge the County to examine the role of affordable housing in helping the County to meet both its RHNA obligations and its future Climate Action Plan goals.

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

Sincerely,



Laura Nunn
Chief of Policy & Education

Madrid, Michael

From: AdvancePlanning, PDS
Sent: Friday, June 4, 2021 7:57 AM
To: Madrid, Michael; Hamilton, Audrey; Easland, Camila; Rasoulzadeh, Rouya
Subject: FW: 11 June General Plan Update

Follow Up Flag: Follow up
Flag Status: Flagged

Hi All,

Please see Mr. Worden's comments below regarding the Housing, Safety, and EJ Elements.

Thank you!

Bianca Lorenzana
Land Use/Environmental Planner
Pronouns: she/her
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County of San Diego | Planning & Development Services
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For local information and daily updates on COVID-19, please visit www.coronavirus-sd.com. To receive updates via text, send COSD COVID19 to 468-311.

-----Original Message-----

From: Kurt Worden <kworden0@gmail.com>
Sent: Thursday, June 03, 2021 8:31 AM
To: AdvancePlanning, PDS <PDS.AdvancePlanning@sdcounty.ca.gov>
Subject: 11 June General Plan Update

Mike,

Reviewing Appendix G (RHNA Map) and H (RHNA Table) they do not align. The table lists properties not on the map and map identifies properties not in the table.

I'll reemphasize that it appears that the Lincoln Acres Island was not considered during development of the EJ Element, That needs to be corrected.

I'd appreciate you addressing this and as well as previous comments on the Annex Q Evacuation Plan.

Thank you
Kurt Worden

