

December 18, 2019

Ms. Vickie White
Senior Planner
City of San Diego Planning Department
9485 Aero Drive, M.S. 413
San Diego, CA 92123
Submitted via email: EDickson@sandiego.gov

Re: Draft 6th Cycle Housing Element

Dear Ms. White:

On behalf of the San Diego Housing Federation, we are writing to express our support of the draft 6th Cycle Housing Element.

The draft Housing Element contains several actionable items that will help advance the city's goals to address the affordable housing and homelessness crisis. We are strongly supportive of many of the activities, policies, and programs outlined in the draft Housing Element. We would like to call specific attention to a few that we believe will have significant impact on achieving housing goals.

Resources to build affordable housing

The draft Housing Element recognizes the need for funding to build housing that is affordable to low-income individuals and families. We look forward to continuing to work with the City toward the recommendation on page HE-8, "The City should continue to work with the San Diego Housing Federation and other affordable housing partners to identify ways to increase and prioritize funding for affordable housing through bond measures, Federal and State grants, and new funding mechanisms."

Our proposal for a \$900 million affordable housing and homelessness bond measure for the November 2020 ballot would create an estimated 7,500 new homes for low-income seniors, veterans, people with disabilities, lower-income families, and people experiencing homelessness. The measure would make it possible to build the 5,400 units called for in the *City of San Diego Community Action Plan on Homelessness* and would build additional units for low-income families at-risk of homelessness.

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 (PHLA), 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-, or moderate income households will help the city meet its RHNA obligations and build housing for people at-risk of homelessness.

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 Lands Act. City implementation of this bill will advance the policy in HE-A.6 to encourage affordable housing on publicly-owned sites suitable for development. We were also proud to support AB 1763, which provides a density bonus for developments that are 100 percent affordable. We recommend that the City move quickly to implement this legislation to serve as tools for building affordable housing.

Improve and streamline processes

We are pleased to see the proposal for the creation of a "diamond lane" process to expedite low-income housing development (HE-45). Expediting the process for affordable housing provides cost savings and speeds up delivery of badly-needed affordable units. The proposal for ombudsman permitting (HE-41) will also help to facilitate development of permanent supportive housing by helping developers to navigate the system and has the potential to support more infill, density bonus projects by supporting small-scale developers who typically utilize these programs for their projects.

Housing for vulnerable populations

We are very supportive of the proposed activity to build a Supportive Services Funding Program (HE-54). As the affordable housing development community builds the supportive housing units that are called for in the *Community Action Plan to End Homelessness*, the need for funding to provide the necessary supportive services will increase. This proposal will be critical to the success of the *Community Action Plan*.

Understanding our housing stock

We appreciate the proposal in HE-E.8 to require that San Diego Housing Commission maintain a comprehensive, consolidated informational resource of units reserved for lower-income households and the proposed activity to conduct a study on available housing in San Diego (HE-55). Combined, these actions could provide a clear picture on the availability and affordability of the existing housing stock in the City.

Advancing Fair Housing and Climate Goals

We applaud the goals in the draft Housing Element to advance Affirmatively Furthering Fair Housing goals and the City's Climate Action Plan. Both are critical to the Housing Element's compliance with new state laws, the priorities of the state regarding Regional Housing Needs Allocation and Housing Elements, and creating more equitable and healthy communities throughout San Diego. We look forward to working with the City to advance the policies, programs, and activities outlined in the Housing Element on these goals.

Overall, the draft Housing Element provides a solid framework to advance the City's housing goals during the 6th Cycle. We appreciate the time and effort Planning Department staff have dedicated to this document and look forward to continuing to support the draft Housing Element as it moves forward.

Sincerely,



Laura Nunn
Director of Policy & Programs