

ATTACHMENT

For Item

#07

Tuesday,  
August 31, 2021

PUBLIC COMMUNICATION RECEIVED BY THE  
CLERK OF THE BOARD

**From:** [Laura Nunn](#)  
**To:** [FGG, Public Comment](#); [Potter, Andrew](#)  
**Cc:** [Naveed Hifza Haris](#); [Stephen Russell](#)  
**Subject:** [External] San Diego Housing Federation comment letter - Items 6 & 7 (8/31) and Item 1 (9/1)  
**Date:** Monday, August 30, 2021 7:22:20 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image007.png](#)  
[County of San Diego housing policy package 08.30.2021.pdf](#)

---

Good evening,

Attached please find a comment letter from the San Diego Housing Federation regarding Item #6 and 7 on the August 31, 2021 and Item #1 on the September 1, 2021 agendas of the San Diego County Board of Supervisors.

Thank you,  
Laura

Laura Nunn (she / her)  
*Chief of Policy & Education*

[San Diego Housing Federation](#)  
3939 Iowa Street, Suite 1  
San Diego, CA 92104  
(619) 239-6693  
[laura@housingsandiego.org](mailto:laura@housingsandiego.org)



Following CDC and state guidelines, all of San Diego Housing Federation is working remotely to support the health and well-being of our staff and members.

For a list of local resources, visit [housingsandiego.org/covid19](https://housingsandiego.org/covid19)

To support our advocacy efforts during COVID-19, give at [housingsandiego.org/donate](https://housingsandiego.org/donate)



## San Diego's Voice for Affordable Housing



3939 Iowa Street, Ste. 1  
San Diego, CA 92104  
Phone: (619) 239-6693  
Fax: (619) 239-5523  
[www.housingsandiego.org](http://www.housingsandiego.org)

August 30, 2021

Board of Supervisors  
County of San Diego  
1600 Pacific Highway, Room 402  
San Diego, CA 92101  
Submitted via email: [publiccomment@sdcounty.ca.gov](mailto:publiccomment@sdcounty.ca.gov)

**RE: Item #6 (Innovative Housing Trust Fund); Item #7 (Transformative Housing Solutions);  
HA Item #1 (Creating a Plan to Increase Project-Based Vouchers)**

Dear Chair Fletcher and Board of Supervisors:

On behalf of the San Diego Housing Federation, I am writing to submit comments on three critical housing policies being considered by the Board this week. Founded in 1990, the San Diego Housing Federation (SDHF) serves as the collective voice of those who support, build, and finance affordable homes in the San Diego region. We would like to thank Supervisors Lawson-Remer, Vargas, and Anderson for their leadership in bringing forward these items and are pleased to support this package of housing solutions. We would also like to offer our feedback to strengthen the proposed policies.

**Item # 6: Advancing immediate and long-term housing priorities through the Innovative Housing Trust Fund**

We strongly support the proposal to place \$20 million into the Innovative Housing Trust Fund (IHTF) and the proposed changes to the criteria and preferences for the fund's NOFA. We are pleased to see the recommendations in our letter to the Board of Supervisors on April 2, 2021 to utilize IHTF as a first-dollar in to be leveraged with other sources and prioritize investment of these funds throughout San Diego County included in this policy proposal. These changes will make the region more competitive for federal and state housing funds as well as ensure that these dollars have an impact on the housing need in communities across the County.

In accordance with California's Affirmatively Furthering Fair Housing law ([AB 686](#), 2018) and in alignment with preferences for state housing funding programs, we recommend that the NOFA also include a preference to meet statewide AFFH goals. This change will also help to make progress on Policy H-6.7 of the County's Housing Element to "ensure that the implementation of housing programs and delivery of housing services are conducted in a manner that promotes equal access to housing and opportunities."<sup>1</sup>

We further recommend that the County identify and commit dedicated revenue for the IHTF. The IHTF has relied on Board investment of general fund revenues, creating uncertainty in ongoing available gap financing for affordable housing. We suggest the County dedicate all or a portion of

---

<sup>1</sup> 6<sup>th</sup> Cycle Housing Element Update, County of San Diego General Plan, p. 27

funds the County receives from redevelopment dissolution, sometimes known as “boomerang funds,” as a dedicated source of revenue for the IHTF. The County can also dedicate the majority of funds it receives from the Permanent Local Housing Allocation ([SB 2](#), 2017) as an ongoing and local funding source. Identifying an ongoing and dedicated source for the IHTF can help the County toward Policy H-3.1 of the County’s Housing Element to “pursue funding from federal, State, and local sources to expand affordable housing opportunities within the unincorporated County.”<sup>2</sup>

**Item # 7: Transformative housing solutions that advance equity, sustainability, and affordability for all**

This proposal offers a significant opportunity for the County of San Diego to adopt a data-based approach to addressing housing needs that identifies the scale of the problem and will lead us to solutions that rise to that scale. With an informed and inclusive approach, the County can pursue meaningful policy changes that will address the many challenges described in the Board letter. We look forward to bringing along the expertise of our members, the affordable housing sector, to participate and support this process. We support the proposal to develop a stakeholder outreach plan to inform the research and evaluation process for this effort and offer our support with outreach to the affordable housing community. We also recommend that, in addition to the list outlined in the Board letter, individuals with lived experience of homelessness are included in the stakeholder outreach.

**HA Item # 1: Expanding affordable housing opportunities through project-based vouchers**

We strongly support the proposal to expand the County’s use of project-based vouchers. The Board letter outlines the several ways that County use of PBVs can increase the supply of deed-restricted affordable housing and support tenants. The use of PBVs can create housing stability for residents, improved access to housing, and access to the supportive services that affordable and supportive housing provide. For these reasons, we are very pleased to see this proposal come forward for consideration. As suggested in this letter above related to the IHTF, we also recommend that Board direction for this item include a priority for projects that achieve AFFH goals. With the restoration of the federal AFFH rule, this change can help to ensure this policy complies with federal mandates as well as state law.

We thank you for your leadership on these important housing policies and for your consideration of our comments. We look forward to continuing to work with the County of San Diego to increase our region’s supply of affordable homes.

Sincerely,



Laura Nunn  
Chief of Policy & Education

---

<sup>2</sup> 6<sup>th</sup> Cycle Housing Element Update, County of San Diego General Plan, p. 25

**From:** [Craig Jones](#)  
**To:** [Vargas, Nora](#); [Lawson-Remer, Terra](#); [Fletcher, Nathan \(BOS\)](#); [Anderson, Joel](#); [Desmond, Jim](#)  
**Cc:** [FGG, Public Comment](#); [Potter, Andrew](#)  
**Subject:** [External] Submittal for Board Meeting Aug. 31, Agenda Item #7  
**Date:** Tuesday, August 31, 2021 8:07:29 AM

---

The County's comment system would not allow me to submit an additional comment; please accept this re: Transformative Housing:

PLEASE use the California Environmental Justice Alliance (CEJA) Housing Policy document,  
[https://calgreenzones.org/wp-content/uploads/2021/07/CEJA\\_GZ-Report\\_ES-05\\_print.pdf](https://calgreenzones.org/wp-content/uploads/2021/07/CEJA_GZ-Report_ES-05_print.pdf), as a policy foundation for County transformative housing solutions!

Craig Jones  
858-354-1785  
bananashke@sbcglobal.net

---

**From:** Melinda Vasquez <mvasquez@housingcoalition.com>  
**Sent:** Tuesday, August 31, 2021 9:06 AM  
**To:** Potter, Andrew <Andrew.Potter@sdcounty.ca.gov>  
**Cc:** Vargas, Nora <Nora.Vargas@sdcounty.ca.gov>; Anderson, Joel  
<Joel.Anderson@sdcounty.ca.gov>; Lawson-Remer, Terra <Terra.Lawson-Remer@sdcounty.ca.gov>;  
Fletcher, Nathan (BOS) <Nathan.Fletcher@sdcounty.ca.gov>; Desmond, Jim  
<Jim.Desmond@sdcounty.ca.gov>  
**Subject:** [External] Agenda Item 7 Comment

Dear Board of Supervisors,

I've attached a letter from the San Diego Housing Coalition regarding Agenda Item 7. If you have any questions, please contact me via email.

Best,  
Melinda Vasquez



August 30, 2021

The Hon. Nathan Fletcher, Chair  
San Diego County Board of Supervisors  
1600 Pacific Highway, Room 335 San Diego CA 92102

**RE: Item 7: TRANSFORMATIVE HOUSING SOLUTIONS THAT ADVANCE EQUITY, SUSTAINABILITY, AND AFFORDABILITY FOR ALL**

Dear Chairperson Fletcher and Members of the Board:

On behalf of the San Diego Housing Coalition (SDHC), a grassroots group of community members, leaders, and elected officials, we wish to provide comment on *Item 7: "Transformative Housing Solutions"* on the Tuesday, August 31, 2021, Board of Supervisors Agenda.

Formed in 2020, the San Diego Housing Coalition aims to be a strong advocate for smart neighborhoods that promote home ownership and rental opportunities along with a good quality of life for households of a variety of income levels. As part of our work the SDHC recently commissioned a county-wide survey of more than 600 residents from all five supervisorial districts, ages 18-65, regarding housing issues and concerns. The data from this survey provided several key insights and reaffirmed that the crisis of affordability and availability is impacting our entire county. Of note, the data demonstrates the clear desire for attainable, new housing in the "*Missing Middle*:" duplexes, townhomes, courtyard homes and live/work opportunities — in San Diego County.

We believe this data is critical in the County's ongoing conversation regarding housing in the region and we applaud the number of housing policies recently and currently in process by the County Board of Supervisors (Board) : 1) *The Housing Element*; 2) *The Safety Element*; 3) *The Environmental-Justice Element*; 4) *County CAP*; 5) *Smart Growth Alternative*; 6) *New VMT Policy*; and most recently, 7) *Transformative Housing*.

We appreciate the opportunity to provide our comments on this subject and encourage the Board to consider the following as these conversations regarding the future of our region's housing supply continue:

- **Holistic Approach:** Just as these issues have moved forward sequentially, the SDHC would encourage the Board to carefully balance these various policies holistically towards a common goal (as state General Plan doctrine requires).
  - For example, pursuing the current "regional-based" VMT policy proposal appears to work against new-build housing by placing a de facto moratorium on new housing in the county. All new policies should complement, not counter, each other.
- **Community Input:** Increased outreach engagement with the community on these critically important activities should take place BEFORE final action is taken on any or all items as introduced by the Board. The County can improve here.
- **"Missing Middle":** While we generally concur with the importance of "subsidized affordable housing" as noted in the letter, the need for new housing goes beyond these segments. Creating





generous volumes of all types of housing—but especially the *“Missing Middle”*—should be of critical importance.

- **County Project Pipeline:** Lastly, we look to the county for strong leadership in generating new housing supply. SDHC has made consistent effort to work with county staff to understand the status of new proposed housing projects in the county’s “pipeline.”
  - To the best of our understanding, the county has ONE project presently processing for approvals. As the County seriously pursues meeting its Regional Housing Needs Assessment (RHNA) objectives, this pipeline must be significantly increased.

Moving forward, the Housing Coalition will continue to advocate for policies that encourage the development of new affordable and attainable housing in the region, and we look forward to working with the Board and staff in these efforts.

Respectfully,

Melinda Vasquez  
San Diego Housing Coalition, Chair