



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.<sup>1</sup> 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

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<sup>1</sup> [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](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,

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