

Brian Schoenfisch, Program Manager
Planning Department
City of San Diego
KM address

VIA E-MAIL

RE: Comments on the November Housing Element Draft

Mr. Schoenfisch,

This letter is to provide comments of the Peninsula Community Planning Board to the Planning Department on the November 15 Draft of the City's Housing Element Update for the 2021-2029 Cycle. We are aware that the City's deadline for these comments was December 20, 2019. It was impossible for us to meet that deadline date. The release date coincided with the last day for matters to be placed on our November agenda and, like many planning groups, the PCPB adjourned its December meeting. We sense that the November 15 version is a progress draft and that our comments will nevertheless be of value to you.

The Housing Element draft is a city-wide document, which correctly states that particular neighborhood policies will be largely implemented through community plans. The PCPB recognizes and affirms the legislative constraints and the magnitude of the housing availability/affordability problem confronting the City. We therefore support the primary aims of the draft element. Beyond that, this comment letter states no position on the City-wide goals and proposals contained in the November 15 draft.

The PCPB does, however, offer these two observations of particular consequence to the Peninsula area:

- Infill Development. In accordance with State Law, the draft element appendices contain an inventory of capacity for further housing development. As a near-fully developed community, Peninsula's available capacity is in the category of under-developed, multi-family zoned areas. As graphic webmap shows, most of this capacity lies in three transitional areas: [1] the Nimitz/Voltaire corridor, [2] near Correia Middle School, and [3] within Roseville. The last of these, uphill of Rosecrans Boulevard between Canyon and Nimitz, has experienced a volatile period of reuse, as new multi-family projects have replaced longstanding single-family homes. These projects have achieved square footage and density at zoning maximums – and sometimes illegally beyond. The PCPB has sought zoning protections and process changes which would expedite infill multi-family development in return for adherence to particular design features and dimensions [See our letter of June 15, 2017 RE: Roseville Height and Bulk].
- Vacation Rentals in Residential Zones. Section HE-26 of the draft element, which lists a number of constraints to maintaining and increasing the supply of housing, and the analysis of available residential capacity in Appendix D are both in error for their failure to account the usurpation of dwelling units by Short Term Vacation Rentals [STVR]. The City Attorney has declared the STVR use to be inconsistent with the Municipal Code, regardless of the policies of the Mayor to not pursue enforcement. We believe that, within its Housing Element, the City has a duty [1] to provide a reliable calculation of the impacts of STVRs on housing inventories and capacities, and; [2] to address a policy approach to STVRs in line with the stated goals of maintaining and facilitating residential uses.

The forgoing comments were adopted by the Peninsula Community Planning Board, by vote of _____ at its meeting of January 16, 2020.

We appreciate consideration of this input by Planning Department staff in furthering the Housing Element process.

Sincerely

Robert Goldyn
Chairman
Peninsula Community Planning Board

cc: Hon. Jen Campbell, Councilmember District 2
Tony Kempton, Planning Department

DRAFT to LRP