



City of Del Mar Staff Report

PLANNING COMMISSION
STAFF REPORT
November 9, 2021

APPLICATION: Revised 6th Cycle Housing Element Update – General Plan Amendment (GPA20-003)

REQUEST: A request for a recommendation from the Planning Commission to the City Council on the revised 6th Cycle Housing Element Update (HEU) based on formal comments received from California Department of Housing and Community Development (HCD) in July 2021: https://www.delmar.ca.us/DocumentCenter/View/7844/Revised-Housing-Element_1132021

NOTE: The City Council will consider whether to adopt the revised HEU in a future noticed public hearing that is anticipated to occur in December 2021.

APPLICANT: City of Del Mar

STAFF CONTACTS: Amanda Lee, Principal Planner
Joseph D. Smith, Planning & Community Development Director, AICP

LOCATION: Citywide

ENVIRONMENTAL STATUS: The 6th Cycle HEU Final Program Environmental Impact Report (PEIR) and associated Mitigation, Monitoring, and Reporting Program (MMRP) was certified by the City Council on October 5, 2020 (State Clearinghouse (SCH) No. 2020029064). The 6th Cycle Final PEIR is available at: www.delmar.ca.us/DocumentCenter/View/7171/Final-PEIR-91020
Housing Programs in the 6th Cycle HEU are also covered, in part, by a separate PEIR (SCH No. 2019029058) prepared for amendments related to 5th Cycle Housing Element Programs 2E (NC zone) and 2F (PC zone). The NC/PC PEIR, which analyzed future housing in the NC, PC, and PF Zones, was certified by the City Council on September 8, 2020. The NC/PC Final PEIR is available at: www.delmar.ca.us/Archive.aspx?ADID=1428. As such, no further environmental documentation is necessary.

BACKGROUND:

After a multi-year public process, the City Council initially adopted the 6th Cycle Housing Element Update (HEU) on March 25, 2021. This 6th Cycle housing plan covers the planning period years 2021 to 2029. Preparation of the HEU involved extensive public outreach and meaningful community participation including nine meetings (including one public workshop) with the 6th Cycle Housing Element Ad-Hoc Citizens' Task Force; and multiple public meetings, informational sessions, and public hearings with the Planning Commission and City Council. Additional information related to past public participation is described in Chapter 1 of the Housing Element, with additional information also on the City's dedicated Housing Element web page: <https://www.delmar.ca.us/772/Housing-Element-Update-6th-Cycle-Housing>

Following the initial adoption of the 6th Cycle HEU, HCD reviewed the City's adopted Housing Element and responded with a letter dated July 9, 2021, reporting the results of its review (Exhibit A). The HEU was subsequently revised in response to the corrections requested by HCD. The City must satisfactorily address the requested corrections in order to obtain certification of the HEU and bring the City of Del Mar into compliance with State Housing Law.

HCD's request for revisions generally covers the following three main topics as further described below within the Analysis section of this report:

Topic 1: "Affirmatively Furthering Fair Housing" analysis to demonstrate compliance with Assembly Bill 686 (2018) and HCD's Guidance Memo that was published by HCD in April 2021.

Topic 2: Sites Inventory modifications to demonstrate the City's plan includes adequate and realistic capacity to meet the assigned RHNA for lower income units.

Topic 3: Housing Program modifications to add specificity regarding timelines/incentives and specify actions targeted to remove identified potential constraints and impediments to affordable housing.

City staff coordinated with its housing consultant Kimley Horn Associates to collect the additional data and prepare the additional analysis. City staff is continuing to coordinate with HCD staff to work through the outstanding issues. Due to timing constraints, HCD staff review is occurring on a parallel track to the Planning Commission review.

ANALYSIS:

Following is a description of the revisions incorporated to address HCD's requested revisions:

Topic 1: "Affirmatively Furthering Fair Housing"

This is a new issue category that was instituted for all 6th Cycle housing elements statewide. State law requires that all Housing Elements include an assessment of fair housing in the jurisdiction. HCD's letter indicated that additional analysis is required including consideration of "trends and patterns at the local and regional level for segregation and integration regarding disability, familial status, and income" and direct analysis of "trends and patterns regarding race at the regional level". In addition, HCD indicated "the element must analyze Racially Concentrated Areas of Affluence (RCAA) and the effects that these concentrated areas have on fair housing issues throughout Del Mar and the region." HCD Guidance Memo (April 2021): https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

Accordingly, the City's revised analysis incorporated local data, addressed provisions within the HCD memo related to RCAA trends and effects, compared Del Mar to the regional fair housing data, added analysis of governmental constraints and program actions to address those potential

constraints, and added an explanation of the rationale for the sites selected to further fair housing objectives. The HCD guidance makes it clear that the additional analysis and explanation of meaningful actions to address housing patterns in RCAA's must be included in the AFFH analysis.

Consistent with State law, the City's overall housing policy goal is to "Inspire a more diverse, sustainable, and balanced community through implementation of strategies and programs that will result in economically and socially diversified housing choices that preserve and enhance the special character of Del Mar." The revised HEU addresses how the City will take meaningful actions to remove the existing zoning impediments in order to achieve these fair housing goals.

Analysis of the regional and local data shows that the City's existing zoning practices are a contributing factor to fair housing issues in the City, which is a similar finding for other coastal cities in the region. According to HCD guidance, the City's existing zoning practices meet the criteria for classification as "exclusionary". For example, the City's existing zoning does not facilitate production of small apartments and condominiums that can provide more affordable housing options. Further, the City's zoning has been maintained as low density since the 1970s to allow primarily single dwelling unit and duplex development and limit the potential for new development at high densities consistent with the Del Mar Community Plan. The City's existing lack of zoning for higher density units is the main difference between Del Mar and other cities in the region. Data shows that the City of Del Mar is the only city in the region that does not have zoning in place to accommodate development of apartment buildings of at least 2-3 stories in height as needed to accommodate production of new affordable units.

To address existing impediments and further fair housing, the City's plan is primarily focused on creating new opportunities for housing mobility (for existing and future residents) by opening the community up to a broader range of housing choices. This will involve the creation of new housing options such as smaller, accessible units that can accommodate residents seeking a different type of housing option that is not currently provided in the community. This can include units that meet the needs of seniors and adult children who want to remain living within the community or the needs of people seeking to move to Del Mar to access good schools, jobs, services, beaches, and parks. Creation of new housing opportunities is a critical step that is needed for the City to help create a more diverse, sustainable, and balanced community.

Potential zoning constraints will be addressed by multiple Housing Element Programs including:

- Program 1A (North Commercial), Program 2A (Professional Commercial), and Program 3A (Central Commercial) to address density by allowing multiple dwelling unit development as an allowed use at 20 dwelling units per acre
- Program 1I (Streamlining and Incentives for Development of Lower Income Units) to prepare an economic study and zoning assessment to better understand the potential constraints and amend the Del Mar Municipal Code as necessary to provide relief or accommodation from any permit procedures (i.e. conditional use permit requirements) and/or development standards (i.e., height, floor area ratio, and lot coverage) as necessary to facilitate the

development of affordable units to meet the City's assigned Regional Housing Needs Assessment (RHNA) for lower income units

The revisions also clarified that the City's plan will meet the anticipated future affordable housing needs of the community through the designation of sites to meet the very-low and low income RHNA need assigned for Del Mar. Affordable housing will be incorporated within existing residential zones as well as commercial zones once amended to allow multiple dwelling unit residential development. This will result in sites that are dispersed throughout the community and will help to further fair housing in Del Mar. As part of the action programs within the HEU, a critical path forward towards fair housing is the City's commitment to amending the Del Mar Municipal Code to permit development of residential units at 20 dwelling units per acre in at least three commercial zones (i.e., North Commercial, Professional Commercial, and Central Commercial).

Finally, the additional analysis helped to clarify the City's priority strategy to locate at least 54 lower income units (which represents over half of the assigned RHNA units including low-, very low- and extremely low-income units) on the State-owned Del Mar Fairgrounds property as a critical strategy that takes advantage of the quality of life opportunities in Del Mar. Further, the analysis clarifies that these prospective units will be integrated within the overall Del Mar community and will enjoy the same access to quality public facilities, amenities, and coastal resources. This is validated by data from the UC Davis center for Regional Change and Rabobank who partnered together to develop the Regional Opportunity Index (ROI). According to the ROI, the City of Del Mar is a very high opportunity area in terms of education, economic, high quality housing, mobility, transportation, health, environment, and civic life opportunities.

Topic 2: Sites Inventory and Analysis of Constraints/Realistic Capacity

The updated sites inventory analysis (Exhibit B) clarifies that the City has sufficient available sites and realistic capacity to meet its RHNA. The initial sites inventory adopted in the March 2021 HEU had several errors and inconsistencies that have been subsequently corrected. This now includes the State Fairgrounds candidate sites to the sites inventory. Additional analysis was incorporated per Government Code Section 65583.2(c)(2)(A) and (B) to justify the City's reliance on the sites identified. The analysis demonstrates that in spite of the fact that some of the sites identified are less than half of one acre and/or are developed with existing uses, there is still a high demand for new housing stock to be developed within the City of Del Mar as required in compliance with State law. The analysis includes a discussion of existing zoning, land use controls, overlay zone requirements, access to facilities, and incentives.

The supporting analysis in Chapter 3 of the Housing Element was revised to incorporate supplemental data and more explicit explanation and detail to demonstrate there is a realistic capacity and likelihood for residential development including affordable housing on the identified sites. This included additional detail related to "small sites" (less than half of one acre) and policy considerations to be implemented to address constraints and facilitate development of multiple dwelling unit residential, including affordable housing, on existing non-vacant (developed) sites.

Small Sites Analysis:

- The owners of 807 Camino del Mar, which is considered a “small site” in an advantageous location, clarified there are no existing limitations or property restrictions that would prevent housing development at this location over the next eight years; and that the owners would be keeping their options open and monitoring opportunities for housing development in the near term.
- The adjacent small sites at 2148 Jimmy Durante Blvd and 2236 Jimmy Durante Blvd are also advantageous locations and in this case present an opportunity for potential lot consolidation to further facilitate multiple dwelling unit development that includes affordable housing.
- The two vacant, City-owned properties at 10th Street and 28th Street are also realistic opportunities for the development of small sites with small affordable units up to a combined capacity of seven units as identified in the sites inventory. This is due to the fact that the sites are City-owned and controlled, which facilitates processing of any prospective project with affordable units. Further, in accordance with Housing Program 1H the City will implement the necessary zoning amendment and processing actions needed to make it clear that development of affordable units is an allowed use in the applicable Public Facilities Zone. As a point of clarification, no parcels associated with Shores Park or the Court Street facility are included as candidate housing sites in the HEU.

Non-Vacant Sites Suitability Analysis:

The analysis of non-vacant sites was supplemented with details to address existing uses, past performance, market demand, whether existing leases are a constraint, and development trends. The HEU notes that correspondence was submitted in 2019 (Exhibit C) representing a majority of the owners in the NC and PC Zones, including owners of candidate sites. The submitted correspondence and petition indicate interest in the City’s housing plan (Chapter 4 of the HEU) and identified the City’s existing development standards in its Zoning Ordinance as “antequated.” The correspondence requested that the City modify its development standards (i.e., parking, floor area ratio, lot coverage, and measurement of height) in order to incentivize construction of housing units. The property owners’ concerns are being addressed via Housing Program 1I (Streamlining and Incentives for Lower Income Units).

Most notably, to support Housing Program implementation and mitigate for any potential constraints, the City made a commitment of funding in its adopted Fiscal Year (FY) 2021-2022 Special Projects Budget to prepare economic studies and zoning/market assessments within the first year of the planning period. The information collected from these studies will help identify assumptions about the funding gap and potential funding sources for development of affordable units in Del Mar and will help inform decisions about potential incentives and accommodations that should be considered to make the development of affordable housing feasible. This demonstrates a significant investment and commitment on the part of the City that will facilitate affordable housing development in Del Mar.

In June 2021, the City Council allocated funding with the FY2021-2022 budget to cover implementation of these economic assessment/feasibility studies for:

- Economic and feasibility studies for prospective affordable housing on the State Fairgrounds property (associated with Housing Program 3A) that is projected to yield an identified *RHNA target of 54 lower income units* – Total Fairgrounds budget allotment is \$225,000 (note that a portion of this amount would be used for the studies); and
- Economic and zoning assessment studies of citywide incentives – budget allotment of \$76,000 for implementation of the following Housing Programs:
 - Program 2A (Incentives for Deed-Restricted Low Income Accessory Dwelling Units or ADUs) – to yield an identified *RHNA target of 15 low income units*; and
 - Program 1D (Economic Study and Potential Affordable Housing Overlay Zone) Program 1I (Streamlining and Incentives for Lower Income Units), and Program 1J (Coordination with Affordable Housing Developers) – to generally yield an identified *RHNA target of at least 44 lower income units* (which is the remaining affordable unit count after subtracting out the RHNA attributed to the Fairgrounds and Accessory Dwelling Unit (ADU) strategies from the total 113 lower income units the City must plan to accommodate)

Accessory Dwelling Units (ADUs):

HEU Goal #2, as adopted by the City Council, is to “Prioritize production of ADUs.” This goal utilizes the State’s prior mandates for inclusion of ADUs into residential zoning and concludes that integration of ADUs into the existing community would be one of the most non-invasive ways for the City to absorb the required increase in housing capacity to help meet the City’s assigned RHNA. This is further highlighted when compared to other required housing strategies such as increasing allowable density to accommodate at least 20 dwelling units per acre. To address HCD’s comments related to ADUs, additional explanation and details were added to the applicable ADU sections in Chapter 3.

While the community has expressed concerns about the by-right allowances and zoning deviations for ADUs provided by State law since January 1, 2020 (i.e., meaning that ADUs must be approved outside of the City’s current Design Review process), local residents and property owners have shown significant interest in the development of ADUs. This is supported by local data that shows a trending significant increase in the number of ADU inquiries, applications approved since January 2020, and new applications in process. The increase in local interest in ADUs coincided with the public outreach and discussions related to the 6th Cycle HEU which began in 2019. The City’s methodology for its 6th Cycle projections took this all into account as well as current rent trends associated with the smallest units (in Del Mar and neighboring communities) and units in locations with more than one dwelling unit per lot. The analysis notes that the City is located in close proximity to the University of California San Diego, which makes this type of housing option one that is in high demand in Del Mar. As part of Housing Programs 7H and 7I, the City will

create informational materials on any ADUs available for rent and make these resources available, particularly for seniors and students of colleges and universities in proximity.

Community and City Council support for the ADU strategy is demonstrated by HEU Goal #2 which affirms this is a priority strategy for the City to meet its entire moderate income unit requirement for RHNA (31 units) as well as meet a RHNA target of 15 low income ADUs. As mentioned above, per the Housing Plan, an economic study and zoning assessment will be conducted within the first year of the planning period to identify and test specific incentive types under various scenarios to ensure Program 2A will be a successful strategy to produce at least 15 deed restricted low income units. Furthermore, Housing Programs 2D and 2E provide for the City and HCD to monitor progress and conduct a mid-cycle review assessment to evaluate whether the City is on target to meet its RHNA. This will help the City to evaluate whether additional policy and/or code amendments may be needed during the 2021-2029 housing cycle.

Additional Housing Constraints/Resources Analysis and Strategies to Remove Constraints:

In addition, the HEU analysis was supplemented with additional details related to potential zoning constraints and specified actions planned to remove those constraints as follows:

- *Sites in the Floodplain Overlay Zone:* The revised analysis includes a more in-depth explanation of floodplain management requirements, and the fact that the added cost for incorporation of flood proofing measures has not been a barrier to development in compliance with federal/state/local floodplain development standards. Further, as a policy consideration to ensure the applicable (non-safety related) floodplain management procedures and standards will not act as a barrier to any residential development identified in the sites inventory, the revised HEU explains that the City will explore whether further accommodation may be needed via Program 1I (Streamlining and Incentives for Lower Income Units). More specifically, Program 1I will consider potential accommodation for the measurement of height in the floodplain in relation to the base flood elevation (i.e., the height at which all habitable development must be located at or above for compliance with safety-related floodplain management standards).
- *Reasonable Accommodations:* The revised analysis clarifies the City's existing procedure, findings for approval, and past reasonable accommodations requests that have been approved by the City. As a policy consideration, the revised HEU explains that Housing Program 7F is a program where on an annual basis the City will monitor and address any constraints upon the maintenance, improvement or development of housing for persons with disabilities. With respect to reasonable accommodations, the City will consider amending the Del Mar Municipal Code to address the findings for approval if it is discovered that the findings for approval are being misinterpreted and/or misapplied to deny reasonable accommodations based on claims of neighborhood compatibility instead of based on objective findings and facts related to the public health and safety as is required by law.

Topic 3: Housing Element Action Programs

Chapter 4 of the HEU is the City's Housing Plan that identifies the various Housing Programs and planned actions to implement its goals and meet its RHNA. In developing the Housing Plan, the City considered many factors including:

- Fair housing to create a more diverse, sustainable, and balanced community;
- The implications of new State law requirements (i.e., required increase in the maximum density allowed in various zones, by-right approval processes, density bonuses, and “no net loss”);
- Desired adherence to the existing Community Plan where local control is not preempted;
- Analysis of local constraints and opportunities for affordable housing;
- Recommendations by the 6th Cycle Housing Element Ad-Hoc Citizens' Task Force (Citizens' Task Force);
- Comments received at public meetings and public hearings;
- Examples of certified Housing Elements in other coastal cities; and
- Feedback provided by HCD.

In terms of revisions, a new Table was inserted in the Housing Plan with a listing of all 41 housing programs (Exhibit D). For each individual Housing Program, information was added to clarify the timeline, responsible agency, budget source, and targeted RHNA. This included new details on timing for ongoing programs, which involve annual reviews and reporting actions.

Significant implementation details clarified include:

- Clarification that Housing Program 1D will involve an economic study and zoning assessment prior to consideration of a potential Affordable Housing Overlay Zone.
- Clarification that Housing Program 1E (rezone of vacant lots on North Bluff/South Stratford) will be required only if Housing Program 3A (Fairgrounds housing) is not timely implemented; that the deadline for the rezone per State law is three years from the date the HEU is (re)adopted; and that implementation of this contingency program is anticipated to address the City's RHNA and fair housing needs for extremely low income households per Assembly Bill (AB) 2634 in a manner that will integrate lower income units into the overall development and demonstrate connectedness to the greater City of Del Mar community.
- Clarification that Housing Program 1H will facilitate the processing of future affordable housing projects in the PF Zone as needed to meet the City's unmet RHNA obligation on two vacant City-owned lots; that both vacant lots are City-owned, developable, controlled by the City, and have not been identified as surplus property; that one City-owned, vacant lot in the PF zone on 10th Street (APN 300-093-17) is an available expansion lot within the overall City Hall complex; and that the second City-owned, vacant lot on 28th Street (APN 299-030-12) is technically located in the RM-East zone, but is designated a public facility in the Community Plan pursuant to a General Plan Amendment adopted by Resolution No. 97-42 on September 15, 1997; and that the City is in process of bringing forward clean-up actions

via the City Council and Coastal Commission for the associated prior rezone to PF processed in 1997 to become effective.

- Clarification that Housing Program 1I (streamlining and incentives for development of affordable housing) will begin with an economic study and zoning assessment to consider the market and comparative cost-benefit impact to property owners and explore various incentives in support implementation; that consideration will be given to recommendations that were previously provided by property owners of various candidate sites, which includes recommendations from owners in the NC and PC Zones who requested no Conditional Use Permits to be required, reduced parking, a modification where height is measured from in the Floodplain Overlay Zone, and a potential increase in FAR to allow for at least 0.60 FAR in the NC Zone and to allow at least 1.0 FAR in the NC and PC Zones to allow for mixed use and residential development; as well as consideration for input from property owners in the PC and CC zones who have also expressed that limits on the number of stories and the one story height limit on the west side of Camino del Mar significantly limit the potential for affordable housing to be developed.
- Clarification of details related to Housing Program 2A (ADU incentive program to produce deed restricted low income ADUs), which will also be informed by an economic study and zoning assessment; and details for implementation of Housing Program 2C to promote deed-restricted low income ADUs.
- Clarification of the implementation of the City's high priority Housing Program 3A (affordable housing on the State Fairgrounds property), which will involve City preparation of an economic study of market conditions, assessment of multi-unit product types, and identify potential funding sources for development of affordable housing. This will allow the City to vigorously pursue partnerships with the State 22nd DAA and adjacent municipalities and solicit interest from affordable housing developers to develop long-term affordable housing on the State Fairgrounds property. Through this process, the City will pursue an agreement for the development of at least 54 low-income units on the State-owned property. Clarified that execution of a binding agreement within 36 months of (re)adoption of this HEU, shall release the City of the requirement to carry out Housing Program 1E (Rezone of North Bluff and/or South Stratford Properties). Clarified that implementation of Housing Program 3A is anticipated to address the City's RHNA and fair housing needs for extremely low income households per AB 2634 in a manner that will integrate lower income units into the overall development and demonstrate connectedness to the greater community within the City of Del Mar.
- Clarification of Housing Program 4B relating to emergency shelters, transitional housing, supportive housing, single occupancy units, and low barrier navigation centers, including clarification that the City will take action to amend the DMMC Chapter 30.04 Definitions to differentiate between the terms "transitional housing" and "supportive housing" and modify the definition of supportive housing accordingly consistent with State law; that in accordance with AB 2634, the City will be accommodating housing capacity for extremely low income households, including single room occupancy units; that Housing Program 3A describes the

actions the City will take to pursue development of lower income units on the State Fairgrounds property, including extremely low income units; and that the City will also be taking action to accommodate special needs housing. This will include consideration of whether amendments to the Del Mar Municipal Code may be needed pursuant to State law to address single room occupancy units in residential zones.

- Clarification that Housing Program 5C will involve processing an ordinance to address short term rentals to preserve existing housing stock and that the anticipated timing is by December 2024.
- Modified the title and description of Housing Program 6A after discovering that the City of Del Mar is a coastal city that is exempt from Senate Bill (SB) 35.
- Modified the description of Housing Program 6B (AFFH) to reflect the updated AFFH analysis in Chapter 3 and the associated targeted actions to further fair housing. This includes a commitment to monitor and respond to complaints of discrimination and partner with appropriate capable organizations to review housing discrimination complaints, assist in the facilitation of equitable dispute resolution, and, where necessary, refer complainants to appropriate state or federal agencies for further investigation, action and resolution. To address the most significant barrier to fair housing in Del Mar, the City will take action to create new housing choices and opportunities available to moderate and lower income households with the intent to help individuals and families remain living in the community or relocate to Del Mar. This will be addressed by various housing programs including Housing Programs 1A through 1C to accommodate multiple dwelling unit development at a density of 20 dwelling units per acre, Housing Programs 1D and 1I to encourage owners to accommodate dwelling units for lower income households, Housing Program 1H to accommodate affordable housing on City-owned properties, Housing Programs 2A through 2F to accommodate ADUs and tiny homes, and Housing Program 3A to develop multiple dwelling unit housing for lower income households on-site with employment opportunities at the State Fairgrounds. The revised description also references additional housing programs included to address AFFH issues including Housing Programs 6E (Environmental Justice Element).

The City will continue to work with the community to address potential constraints to fair housing within Del Mar. This will include periodic reviews of the regulatory process to assess whether modifications are needed to accommodate persons with disabilities and may include actions such as an analysis of barriers to entry into homeownership or rental, review of historic policies or restrictions that may have prevented or may still prevent disadvantaged groups from locating in Del Mar, or specific actions that contribute to Del Mar being a more inclusive to all racial, social and economic groups. Further, the City will participate in regional efforts to mitigate impediments to fair housing. In an effort to better connect fair housing information and resources with targeted groups, the City will utilize its web page as well as local non-profits to publish and share information on home financing opportunities and other housing and community assistance resources. Fair housing materials will be published in English and

Spanish. Additional housing programs related to fair housing and community assistance are identified in Housing Programs 7A through 7J.

- Modified Housing Program 6C (Continue Data Collection and Compliance with the Coastal Act and Housing Element-Related Requirements applicable to the Coastal Zone, including State-Mandated Accommodation of Housing Development Capacity), which will involve working with the Coastal Commission and HCD to “harmonize” the Coastal Act and State Housing laws and identify a strategy to best accommodate future development capacity as assigned to the City for the 6th Cycle. This will involve discussions of the potential development constraints associated with the development of affordable housing within the coastal zone and the need for preservation of existing long-term housing in the Coastal Zone per Housing Program 5C.
- Clarified that per Housing Program 6E (Environmental Justice Element) the City is voluntarily committing to adopt an Environmental Justice Element (as a new Element of the City’s Community Plan) to further demonstrate its commitment to fair housing and public health.
- Clarified Housing Program 6G (Objective Design Standards) will involve preparation of objective design standards for adoption in a new Chapter under the Title 23 Building and Construction regulations to apply to housing projects where the City’s discretion over design review is otherwise preempted per State law. For example, projects requesting a density bonus per State law or projects on a site rezoned per State Housing Element law (Government Code Section 65583.2(h) and (i)). The new objective residential design standards are also intended to address other types of by-right/ministerial single dwelling unit development that is subject to the provisions of State Housing law including SB 9 and Accessory Dwelling Units (ADUs). On October 21, 2021, the City Council identified creation of these objective residential design standards as a priority and directed staff to work with the Design Review Board (DRB) and City Council housing liaisons to prepare the objective standards. Processing of an Ordinance will be subject to review by the City’s Design Review Board and Planning Commission, prior to adoption by the City Council. Coastal Commission certification would not be required because the action would not amend the City’s Local Coastal Program.
- Modified the title and clarified the description of Housing Program 7A (Housing Funding Resources Including Housing Assistance and Housing Reserve Funds). Explained that the City currently accommodates four lower income households in existing housing through a rental subsidy that is allocated by the City Council from the General Fund. Through Housing Program 7A, the City will ensure that the funds accrued in the City’s Housing Reserve Fund and Housing Assistance Fund remain available during the 6th Cycle for implementation of at least four lower income households via rental subsidy and/or new affordable housing (i.e., for the acquisition of land and construction of affordable units to be made available for individuals or families of extremely low, very low or low income levels)

- Clarified that per Housing Program 7C (Resources for Persons with Disabilities) the City will publish an updated resource list that includes any additional opportunities relating to services and facilities available for persons with disabilities after implementation of various housing programs to address special needs housing options including Housing Program 4A (Residential Care Facilities) and Housing Program 4B (Emergency Shelters, Transitional Housing, Supportive Housing, Single Room Occupancy Units, and Low Barrier Navigation Centers). Once created, the City will make the updated list available to the public. Further, the City will monitor and respond to complaints of constraints to housing for persons with disabilities through coordination and assistance from local non-profits via Housing Program 7F.
- Added clarification to Housing Program 7D (Housing Choice Voucher Program) to indicate that there at least 199 persons on the waitlist for local housing assistance and the City continues to receive inquiries for what is an unaccommodated need across the region.
- Modified the title for Housing Program 7F (Monitor and Respond to Complaints of Constraints to Housing for Lower Income Households and Persons with Disabilities) and clarified this will be done through coordination and assistance from local non-profits.
- Clarified under Housing Program 7G (Senior Housing Resources and Assistance) that the assistance will continue to be provided via Del Mar Community Connections and other local non-profit organizations.
- Modified the title for Housing Program 7I (Maintain a Database of Community Assistance Programs Available to Residents, Including Programs Run by Local Non-Profit Organizations).
- Updated the Table Summary of Quantified Objectives to fill in the missing data that was previously marked as “TBD” and correct the Table number to reflect it is part of Chapter 4 (not Chapter 3). The Table now reflects the correct RHNA numbers as well as the four existing lower income households that are currently assisted through rental subsidy via local housing assistance as allocated by the City Council from the General Fund. The revised Table clarifies that through Housing Program 7A, the City will ensure that the funds accrued in the City’s Housing Reserve Fund (directly funded by City Council from the General Fund) and Housing Assistance Fund (funded by housing mitigation fees from private development applications) remain available for implementation of at least four lower income households via rental subsidy and/or new affordable housing (i.e. for the acquisition of land and construction of affordable units to be made available for individuals or families of extremely low, very low or low income levels). The Table also clarifies that the City currently does not have any constructed deed-restricted affordable units to be conserved or rehabilitated during the 6th Cycle.

RECOMMENDATION:

The Planning Commission is asked to review the revised 6th Cycle HEU and provide a recommendation to the City Council. The Planning Commission recommendation will be provided to the City Council for consideration at a future noticed public hearing. Meanwhile, City staff will continue to coordinate with HCD to discuss the revised HEU, which will be formally submitted to HCD for certification should the City Council re-adopt the HEU. Final certification by HCD is required in order for the Housing Element to become effective and for the City to be in compliance with State Housing law.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Amanda Lee".

Amanda Lee
Principal Planner

- Exhibit A – HCD Letter with Requested Corrections dated July 9, 2021
- Exhibit B – Sites Inventory Analysis
- Exhibit C – 2019 Correspondence submitted by Property Owners in NC/PC Zones
- Exhibit D – List of all 41 Housing Programs

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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July 9, 2021

Ashley Jones, Interim City Manager
City of Del Mar
1050 Camino Del Mar
Del Mar, CA 92014

Dear Ashley Jones:

RE: Del Mar's 6th Cycle (2021-2029) Adopted Housing Element

Thank you for submitting the City of Del Mar's (City) housing element, which was adopted March 25, 2021, and received for review on April 9, 2021. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The adopted housing element addresses some statutory requirements described in HCD's December 17, 2020; however, additional revisions are necessary to fully comply with State Housing Element Law (Article 10.6 of the Gov. Code). In particular, the adopted element requires additional special needs data analysis, analysis regarding Affirmatively Furthering Fair Housing, and additional deliverables for housing programs listed. The enclosed Appendix describes these, and other revisions needed to comply with State Housing Element Law.

The revisions must be adopted for the element to comply with State Housing Element Law (Article 10.6 of the Government Code). Therefore, the element will comply with State Housing Element Law when it is readopted to incorporate the revisions enclosed and submitted to HCD for review, pursuant to Government Code section 65585, subdivisions (b) and (g).

The housing element identifies sites smaller than one-half acre to accommodate housing for lower-income households. Absent the analysis required by Government Code section 65583.2, subdivisions (c)(2)(A) and (B), HCD did not consider these sites toward accommodating any portion of the Regional Housing Needs Allocation (RHNA) for lower-income households. Del Mar should not consider them adequate, available or additional sites pursuant to Government Code section 65863 (No-Net Loss Law).

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. When the element fully meets statutory requirements, the City will meet housing element requirements for these and other funding sources.

HCD appreciates the dedication and effort that the City's housing element team provided throughout the course of the housing element review. We are committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Jose Ayala, of our staff, at Jose.Ayala@hcd.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannan West". The signature is fluid and cursive, with the first name being more prominent.

Shannan West
Land Use & Planning Unit Chief

Enclosure

APPENDIX City of Del Mar

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

A. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction (Gov. Code, § 65583, subd. (c)(10)(A).)*

While the element provides general analysis regarding affirmatively furthering fair housing, such as additional analysis regarding the location of sites in low-to-moderate income neighborhoods, additional analysis is required. For example, the element must look at trends and patterns at the local and regional level for segregation and integration regarding disability, familial status, and income. Additionally, the element must analyze trends and patterns regarding race at the regional level; currently, the element does not provide any direct analysis.

Furthermore, the element states that there are no Racially/Ethnicly Concentrated Areas of Poverty (RECAP) areas in the jurisdiction; however, similar analysis is missing at the regional level. Additionally, though the element states that Del Mar does not have any RECAP areas, the element must analyze Racially Concentrated Areas of Affluence (RCAA) and the effects that these concentrated areas have on fair housing issues throughout Del Mar and the region.

Detailing the access to opportunity in the jurisdiction, the element analyzes education, transit, and environmental health indicators at the local level, but does not provide similar analysis at the regional level. Moreover, the element must also analyze access to economic opportunity at both the local and regional level.

When detailing the disproportionate housing need, the element must analyze the effects of cost burdened households, overcrowded households, substandard housing, and homelessness at the local and regional level; the element must also provide additional displacement analysis at the local and regional level.

While the element relies on Regional Analysis to Impediments (AI) findings, the element must also include local data and knowledge and other relevant factors that contribute to fair housing issues in Del Mar. The element should rely on local expertise to relay

information and data not captured by analysis regarding fair housing issues in the jurisdiction.

Additionally, the element must fully analyze how the sites listed in the inventory affirmatively further fair housing. Currently, the analysis relies on racial analysis for lower-, moderate- and above moderate-income housing, but should also look at the proximity of lower-income sites to transit, schools, and other amenities. In addition, the element provides general contributing factors to fair housing issues based on AI findings, but must also rely on local knowledge and other known relevant contributors to fair housing issues to establish the contributing factors to fair housing issues. Once these have been established, the City should base their programs on the contributing factors and provide targeted actions with quantifiable outcomes to combat these fair housing issues in Del Mar. HCD encourages the City to utilize resources provided by HCD: <https://www.hcd.ca.gov/community-development/affh/index.shtml>. Please refer to the December 17, 2020 letter for additional information.

- An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Electronic Sites Inventory: While the site inventory now includes most of the required information, it still does not sufficiently describe existing uses to facilitate an analysis of the potential for redevelopment. The site inventory must provide additional narrative regarding the existing uses of the sites listed. Moreover, the sites inventory does not identify all of the sites the City is relying on to accommodate the lower-income Regional Housing Needs Allocation (RHNA). For example, the Fairgrounds site identified on pages 3-46 and 3-47 is not included. The sites inventory must include all sites that have been identified to accommodate the RHNA at all income levels. Additionally, if sites are planning on being consolidated, this information must be made available and must be included in the electronic sites inventory. The full use of the electronic sites inventory will assist Del Mar in fully meeting the analysis requirements of Government Code 65583.2.

Realistic Capacity: The housing element did not address this finding. As noted in the December 17, 2020 HCD letter to the City, the element must include an analysis to support the number of units estimated on each site in the inventory and the likelihood of residential development in zones allowing non-residential uses (e.g., North Commercial and Professional Commercial zones). Currently, the element assumes full build-out of sites listed for very low- and low-income households but must also adequately support or correct this assumption based on factors such as land-use controls, overlay zone requirements, and other standards. While the element relies on the programs to support these assumptions, the programs does not make any commitments to incentives that will significantly support the development of residential uses on non-residentially zoned sites. Programs must be modified with quantifiable objectives, incentives to promote this development, and a timeline for these incentives to be available within the first portion of the planning period.

Suitability of Nonvacant Sites: While the element provides a statement that revised zoning standards will prompt new interest in the development of nonvacant sites, additional information and analysis is needed to demonstrate potential for additional residential development on these sites. For instance, the element cites general housing trends in the for the current market demand of units but does not relate how those trends relate to the sites listed in the inventory. Additionally, the element must further analyze the likelihood of redevelopment on these sites. Lastly, the element states that it does not have access to private party lease agreements or contractual agreements amongst private parties. However, the element does not relate any efforts made by Del Mar to contact property owners regarding potential residential redevelopment. As noted in the element, lease agreements constitute an impediment to redevelopment of nonvacant sites; Del Mar must explain the mechanisms through which these nonvacant sites were selected as viable sites for housing. Please see HCD's December 17, 2020 review for additional information.

Additionally, the housing element must re-evaluate the sites currently listed as vacant on Table B-3. Site 2991003000 is currently listed as vacant but according to San Diego Association of Government's (SANDAG) Parcel Lookup Tool, this site appears to have existing uses and improvements on the property. Del Mar should re-evaluate this site and appropriately distinguish whether the site is vacant or nonvacant. Depending on a complete site analysis, if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households, the housing element must demonstrate that the existing use is not an impediment to additional residential development in the planning period (Gov. Code, § 65583.2, subd. (g)(2)). This can be demonstrated by providing substantial evidence that the existing use is likely to be discontinued during the planning period.

Affirmatively Furthering Fair Housing: The element provides general information regarding race and the location of the sites listed in the inventory, but it does not provide any additional analysis. Specifically, Del Mar must analyze the impacts of accommodating a significant portion of the lower-income RHNA at the Fairgrounds site. Additionally, other factors such as access to transit, schools, and employment should be analyzed when identifying sites to foster inclusive communities.

Small Sites: The housing element identifies sites (807 Camino Del Mar, 28th Street, and 10th Street) below the one-half acre threshold for meeting the lower-income RHNA. The element must describe existing and proposed policies or incentives the City will offer to facilitate development of small sites. Sites smaller than a half-acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the element describes other evidence to HCD that the site is adequate to accommodate lower-income housing (Gov. Code, § 65583.2, subd. (c)(2)(A)). Currently, it is unclear by what means these sites will be made affordable, and absent any additional analysis, these sites will not be considered towards accommodating any portion of the lower-income RHNA. For example, the analysis could describe the City's role or track record in facilitating small-lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels

suitable and ready for lot consolidation such as common ownership, or information from the owners of each aggregated site. Based on conversations with City staff, the element should describe the role of small sites being City-owned and proposed processes to facilitate development of lower-income housing on these sites.

Accessory Dwelling Units (ADU): The element was not revised to address this requirement. The element must describe the incentives and policies the City will offer to ensure the affordability of ADUs to meet the lower-income RHNA. For example, the element can describe interest in the renewal of the ADU incentive program and provide a justification for the percentage increase in affordable ADUs from 5% to 15%. Please see HCD's December 17, 2020 review for more information.

Environmental Constraints: The element was not revised to address this requirement. The element must provide information regarding the impact of mitigative efforts on the cost and feasibility of development in areas that are environmentally constrained. Please see HCD's December 17, 2020 review for more information.

- 3. An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Government Code section 65584 and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7). Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. (Gov. Code, § 65583, subd. (a)(5).)*

Housing for Persons with Disabilities: The element was not revised to address the reasonable accommodation procedure and approval findings. Please see HCD's December 17, 2020 review for more information.

- 4. An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing. (Gov. Code, § 65583, subd. (a)(6).)*

Identified Densities and Approval Times: The element was not revised to address these requirements. The element must adequately identify these nongovernmental constraints. Please see HCD's December 17, 2020 review for more information.

5. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

The housing element was not revised to address the special housing needs of farmworkers and persons with developmental disabilities. The element should look at the special housing needs of farmworkers relative to the region and should include jurisdiction-specific data on the number of persons with a developmental disability. Please see HCD's December 17, 2020 review for more information.

B. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

While the element was revised to provide timelines for several programs, Programs 6B (Affirmatively Furthering Fair Housing), 7A (Housing Assistance Reserve), 7D (Housing Choice Voucher), and 7G (Non-profit Housing and Assistance Programs) are still in need of a discrete timeline for implementation.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

Program 1E: Pursuant to Government Code section 65583, subdivision (c)(1), rezones to accommodate a shortfall must occur within three years of adoption of the housing element. Program 1E states that, should the agreement for the Fairgrounds property not

occur within 36 months of the adoption of the 6th cycle housing element, the City would rezone within 6 months of the end of the 36-month progress period for Program 3A. This timing does not meet statutory requirements. Program 1E's timing must be amended to rezone within three years of adoption pursuant to Government Code section 65583, subdivision (c)(1).

3. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

The element was not revised to address this requirement. The element must establish programs that has specific outcomes for the development of extremely low-income households. Please see HCD's December 17, 2020 review for more information.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Finding B4, the element was not revised to address this requirement. Upon a complete analysis of nongovernmental constraints, the element must add or modify programs, as appropriate. Please see HCD's December 17, 2020 review for more information.

5. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

The element was not revised to fully address this requirement. Based on a complete analysis of fair housing issues in the jurisdiction, the element must create programs targeted at reducing impediments to fair housing in the jurisdiction. Please see HCD's December 17, 2020 review for more information.

C. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

The element was not revised to address this requirement. The element must quantify objectives for conservation, rehabilitation and other City-assisted programs. Please see HCD's December 17, 2020 review for more information.



Appendix B: Candidate Sites Analysis



APPENDIX B: CANDIDATE SITES ANALYSIS

A. CANDIDATE SITES ANALYSIS OVERVIEW

The Housing Element is required to identify sites by income category to meet the City's RHNA Allocation. The sites represent the City of Del Mar's ability to develop housing at the designated income levels within the planning period (2021-2029). These sites must be residentially zoned or within a zone that permits residential uses.

Appendix B provides detailed information on the sites identified to meet the City's RHNA, including:

- ▶ Assessor Parcel Number (APN)
- ▶ Address
- ▶ Size (Acres)
- ▶ Zoning
- ▶ General Plan Land Use
- ▶ Ownership
- ▶ Existing On-site Uses
- ▶ Density
- ▶ Potential Development Capacity (Dwelling Units)

A summary of this information is included within the Housing Resources section of Del Mar's 2021-2029 Housing Element.

Table B-1 shows the City's 2021-2029 RHNA need by income category as well as a breakdown of the sites identified to meet that need. The analysis within **Appendix B** shows that the City of Del Mar has the capacity to meet the 2021-2029 RHNA allocation.

1. WATER, SEWER, AND DRY UTILITY AVAILABILITY

Each site has been evaluated to ensure there is adequate access to water and sewer connections as well as dry utilities. Each site is situated with a direct connection to a public street that has the appropriate water and sewer mains and other infrastructure to service the candidate site.

2. ACCESSORY DWELLING UNITS (ADUS)

Accessory dwelling units are an important method for creating additional housing at all income levels within Del Mar. With new legislation directed at promoting the development of ADUs, it is anticipated that the annual number of ADUs developed within Del Mar will continue to increase substantially. Additionally, the City's ADU Pilot Program (discussed in the Housing Resources section) which currently provides an additional square footage incentive for participating property owners, will be expanded to offer additional incentives to homeowners who deed restrict an ADU on their property for rent to a lower income household in an effort to increase the number of lower income units in Del Mar.

New legislation has made it so ADUs can be developed essentially wherever residential uses are permitted. In order to analyze the potential for ADU development within the 2021-2029 planning period, the City

identified all residentially zoned parcels (approximately 2,013) and conservatively estimated that 5% of the available parcels will develop an ADU during the planning period. While this exceeds the past performance for development of ADUs within the City, there are a variety of factors that have stimulated recent interest in ADUs and facilitated production. This includes the new legislation that took effect January 1, 2020, the City's ADU Pilot Program (incentive program), creation of ADU plan templates to facilitate processing of ADU applications, local process streamlining improvements, and greater coordination with Coastal Commission staff in the San Diego district office to minimize appeals.

The City's existing permit process supports development of ADUs and will be further improved through expansion of opportunities for production of ADUs and tiny houses. The Housing Element includes six action programs that are focused on ADUs including a mid-cycle progress review to help assess whether additional incentives should be offered to further encourage production of ADUs for lower income households. The referenced policies and programs within the Housing Element demonstrate the City is committed to further promote and support ADU development. Moreover, the projections for ADU production during the 6th Cycle can reasonably be achieved. In 2020, the City issued building permits for 13 ADUs and an additional 21 ADUs are in process of building permit approval. At this pace, it can be reasonably anticipated that at least 100 ADU building permits will be issued during the planning period (2021-2029) at a rate of at least 12 per year, and that 15% of the total ADUs will take advantage of the various incentives offered in exchange for commitments to deed restrict the ADUs as affordable to lower income households.

As shown in **Table B-1**, it is anticipated that 100 total ADU units will be developed within Del Mar over the planning period. This includes 15 ADUs at lower income affordable rates, which will be facilitated through incentives in order to meet the 15-unit target. The remaining 85 units projected in the Housing Element are anticipated to develop at moderate or above moderate-income levels, which is in line with current ADU production rates.

Table B-1a: Summary of RHNA Status and Sites Inventory (Dwelling Units) North Commercial Zone instead of Border Avenue Rezone					
	Extremely Low/ Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
2021-2029 RHNA	37	64	31	31	163
2013-2021 Carryover		12			12
RHNA Obligation including Carryover	37	76	31	31	175
RHNA Credit (Units Built during current projection period)	0	0	13	1	14
Total Net RHNA Obligations Remaining	37	76	18	30	161
Sites Available to meet RHNA					
Professional Commercial (PC) Zone	3 ¹		--	14	17
North Commercial (NC) Zone (not including Watermark lots)	22 ²		--	92	114
Rezoned Watermark Lots	10 ³			38	48
Public Facilities (PF) – City Owned Properties	4 ⁴		--	--	4
941 Camino Del Mar Specific Plan	2		--	9	11
Existing Residentially Zoned Properties	3 ⁵		17 ⁶	11 ⁶	31
Accessory Dwelling Unit Production	15		45	40	100
Total Potential Capacity	59		62	204	325
Sites Proposed for Rezoning (if required)	54 ⁷		0	0	54
Total Sites Available	113		62	204	379
Sites Surplus/Shortfall (+/-)⁸	0		+44	+174	+218
Notes:					
1. Relies on 807 CDM and 853 CDM.					
2. Relies on 2002 Jimmy Durante Blvd. (JDB), 2010 JDB, 2120 JDB, 2126 JDB, 2148 JDB, and 2236 JDB.					
3. Relies on APNs 299-100-47 and -48.					
4. 4 units are attributed to one lot: City Hall expansion lot C (APN 300-093-17). This is candidate site 55.					
5. 3 units are attributed to a City owned vacant lot in the RM-East zone (APN 299-030-12). This is candidate site it is in the Floodplain overlay zone.					
6. Comprised of sites included within Table B-4.					
7. 54 lower income units are planned for the State Fairgrounds property. If Program 3A is not timely implemented, then rezone per Program 1E will be required.					
8. Calculated by taking the total sites available and subtracting the net RHNA obligation.					

Table B-1b: Summary of RHNA Status and Sites Inventory (Dwelling Units) – Alternative – Border Ave Rezone instead of North Commercial (NC) Zone					
	Extremely Low/ Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
2021-2029 RHNA	37	64	31	31	163
2013-2021 Carryover		12			12
RHNA Obligation including Carryover	37	76	31	31	175
RHNA Credit (Units Built during current projection period)	0	0	13	1	14
Total Net RHNA Obligations	37	76	18	30	161
Sites Available to meet RHNA					
Professional Commercial (PC) Zone	3 ¹		--	14	17
Rezoned Watermark Lots (NC)	10 ²			38	48
Public Facilities (PF) – City Owned Properties	4 ³		--	--	4
941 Camino Del Mar Specific Plan	2		--	9	11
Existing Residentially Zoned Properties	3 ⁴		17 ⁵	11 ⁵	31
Accessory Dwelling Unit Production	15		45	40	100
Total Potential Capacity	37		62	112	211
Sites Proposed for Rezoning (if required)	76 ⁶		0	112	188
Total Sites Available	113		62	224	399
Sites Surplus/Shortfall (+/-)⁷	0		+44	+194	+238
Notes:					
1. Relies on 807 CDM and 853 CDM.					
2. Relies on APNs 299-100-47 and -48					
3. These 4 units are attributed to one lot: City Hall expansion lot C (APN 300-093-17). This is candidate site 55.					
4. These 3 units are attributed to a City owned vacant lot in the RM-East zone (APN 299-030-12). This is candidate site 7. It is in the Floodplain overlay zone.					
5. Comprised of sites included within Table B-4.					
6. Relies upon 22 lower income affordable units via the Border Avenue Rezone and 54 lower income units at the State Fairgrounds. If Program 3A is not timely implemented, then rezone per Program 1E will be required to address the 54 lower income deficit units from Fairgrounds.					
7. Calculated by taking the total sites available and subtracting the net RHNA obligation.					

B.1 VERY LOW- AND LOW-INCOME CANDIDATE SITES INVENTORY

This section contains a description and listing of the candidate sites identified to meet the Del Mar's very low and low income RHNA need.

1. CALCULATION OF UNIT CAPACITY

Sites within the Professional Commercial (PC) Zone

Sites within the PC zone were primarily selected based on the site location along the City's main commercial corridor pursuant to the existing housing plan set forth per 5th Cycle Program 2F housing program to create adequate sites in the PC zone. The sites were further evaluated for development potential based on site characteristics such as site size and potential development yield. The City adopted an ordinance in September 2020 in accordance with the 5th Cycle Housing Element. The City is in the process of gaining Coastal Commission certification of the locally adopted ordinance to allow the development of housing at 20 dwelling units per acre. This zone is made up of a total of four lots that can yield a total of 26 units, including five lower income units. The development yield was calculated by assuming that 20% of the potentially developable units (density multiplied by gross parcel acreage) for each site would be affordable at the lower income levels (based on the City's inclusionary housing ordinance requirements). Only two of the four lots are being relied upon to meet a portion of the City's lower income RHNA. This includes 807 Camino del Mar, which can yield 6 units including one lower income affordable unit; and 853 Camino del Mar which can yield 11 units, including two affordable units. These sites are currently developed with older office development that is likely to redevelop during the planning period (2021-2029).

Sites within the North Commercial (NC) Zone

Sites within the NC zone were primarily selected based on the sites proximity to the State Fairgrounds and connection to the City's main commercial corridor pursuant to the existing housing plan set forth per 5th Cycle Program 2E to create adequate sites in the NC zone. The sites were further evaluated for development potential based on site characteristics such as site size and potential development yield. The City adopted an ordinance in October 2020 and is in the process of gaining Coastal Commission certification of the locally adopted ordinance to allow the development of housing at 20 dwelling units per acre and to permit residential as the sole use within a site in these zones. In November 2020 a Referendum of the adopted Ordinance 973 was filed. In order for the Ordinance to become effective, it must be affirmed by a public vote or must be withdrawn by the Referendum proponent.

There are 16 lots in the NC zone. Seven of the 16 lots are infeasible for multiple unit housing development for various reasons including size, existing use, and environmentally sensitive land constraints. The remaining nine lots have housing development potential. Two of the nine lots are part of an existing development application (Watermark LP) to develop a 48 unit project, including 10 lower income affordable units on APNs 299-100-47 and -48, consistent with the 5th Cycle Housing Element Rezone Program 2G. The remaining seven lots can yield 124 units, including 24 lower income affordable units. Six of those seven lots are being relied upon to meet a portion of the City's lower income RHNA. This includes a total of 22 lower income affordable units from the following properties: 2002 Jimmy Durante Blvd, 2010 Jimmy Durante Blvd, 2020 Jimmy Durante Blvd, 2126 Jimmy Durante Blvd, 2148 Jimmy Durante Blvd, 2148 Jimmy Durante Blvd, and 2236 Jimmy Durante Blvd. The development yield was calculated by assuming that 20% of the potentially developable units (density multiplied by gross parcel acreage) for each site would be affordable at the lower income levels (based on the City's inclusionary housing ordinance requirements).

Sites within the 941 Camino del Mar Specific Plan

The 941 Camino del Mar Specific Plan is a zone that was adopted by the City Council and certified by the Coastal Commission. Based on the development agreement and various applications in process, the City anticipates two units for low income households to be developed on this site during the planning period (2021-2029).

Sites within the Public Facilities (PF) Zone

The PF zone applies to City-owned property. The City will amend the PF Zone to make it clear that housing is an allowed use. One existing vacant site, expansion lot C on 10th Street that is part of the greater City Hall complex, is identified within the City’s adequate sites inventory to meet a portion of the City’s lower income RHNA (4 units). This site is not identified as excess property. It is a property the City could develop with affordable units for lower income households if needed to meet the City’s RHNA obligations.

Sites within Residential Zones

Within the RM-East zone, the City owns a vacant lot (APN 299-030-12) that is identified within the City’s adequate sites inventory to meet a portion of the City’s lower income RHNA (3 units). This site is not identified as excess property. It is a property the City could develop with affordable units for lower income households if needed to meet the City’s RHNA obligations.

Sites to be Rezoned

The Housing Element proposes to develop at least 54 affordable units on the State Fairgrounds property through a prospective development agreement. If the agreement is not reached within the first 3 years of the planning period per Program 3A, per contingency Program 1E the City will rezone up to nine sites currently zoned for lower density residential uses to address the deficit of 54 lower income affordable units. The rezone action would be addressed by applying an overlay zone that will accommodate the development of multi-dwelling unit housing at 20 dwelling units per acre through a “by right” process per Government Code Sections 65583.2(h) and (i). **Table B-2** shows those sites set to be rezoned as part of the Housing Element Policy Program.

Site Number/Name	Gross Acreage	Potential Units	
		Lower Income	Above Moderate
Site 1(a-f): North Bluff Properties	12.39	47-61	200-250
Site 98(a-c): South Stratford Properties	4.94	19-25	80-99
Total	17.33	66	280-349

Like many areas within Del Mar, these sites are located in areas where the land values are high, decreasing the likelihood that a project will be proposed with 100% affordable units. In calculating the potential dwelling unit capacity, the Housing Element assumes that 20% of the potential units available to be developed on this site will be designated as very-low and low income. This is a reasonable assumption because the City’s inclusionary housing ordinance requires this as the minimum level of affordability. Further, because this is also the level of affordability needed for a project to receive a density bonus per State law . The remaining units within such projects are anticipated to be above moderate.

It should be noted that four of the nine vacant sites to be rezoned are located within the Coastal Bluff Overlay zone, which prohibits development within 40’ of the edge of the bluff. The Housing Element

anticipates all nine sites will be needed, if a rezone action is necessary, in order to achieve sufficient sites to meet the City’s lower income RHNA obligation.

2. SELECTION OF SITES

Sites identified within Housing Element rezone programs to meet the City’s very-low and low income RHNA were selected based on their ability to meet the default density of at least 20 dwelling units per acre and the AB 1397 size requirements of at least .5 acres but not greater than 10 acres.

Sites were selected based on their potential viability to accommodate lower income housing within the 2021-209 planning period. This includes an evaluation of vacant land within the City (**Table B-3**) as well as underutilized sites that may provide the potential for redevelopment to accommodate residential at higher densities.

Site Type	# of Units	% of Lower Income RHNA Allocation (101 Units)
Vacant	59	58%
Non-Vacant	56	55%
Total	115	113%

The following parcels are included in the vacant parcels calculation above:

- ▶ 2990301200 (28th Street) - 4 units
- ▶ 3000931700 (10th Street) - 6 units
- ▶ 2982410600 (Border Avenue) - 10 units
- ▶ 2982412900 (Camino Del Mar) - 3 units
- ▶ 2982413400 (Border Avenue) - 12 units
- ▶ 2982413500 (Border Avenue) – 6 units
- ▶ 2982413600 (Camino Del Mar) – 6 units
- ▶ 2991004900 (2236 Jimmy Durante Blvd) – 1 unit
- ▶ 2991004800 (Jimmy Durante Blvd) – 6 units
- ▶ 2991004700 (Jimmy Durante Blvd) – 4 units
- ▶ 2991003000 (Jimmy Durante Blvd) – 1 unit

For the purposes of this analysis, accessory dwelling unit potential was calculated separately as outlined within the Candidate Sites Analysis Overview section above. ADUs represent additional potential units to meet the City’s RHNA.

3. DEVELOPMENT OF NON-VACANT SITES

[While the City meets 50 percent of the Low and Very Low income RHNA on vacant sites, there is additional analysis required to support the assumptions for redevelopment of non-vacant sites.](#)

Existing Lease Agreements

Existing lease agreements on infill and non-vacant properties present a potential impediment that may prevent residential development within the planning period. State law requires the City to consider lease terms in evaluating the use of non-vacant sites, however the City does not have access to private party lease agreements or other contractual agreements amongst parties because they are private documents. Therefore, the City has conducted an analysis to identify sites that show characteristics indicating they are likely to redevelop within the planning period, including past performance, an on-the-ground existing use analysis and a market analysis to understand cost of land, construction, and development trends in Del Mar.

Experience Developing Non-Vacant

The City of Del Mar is a built-out community, with little vacant land available. Therefore, most recent construction is redevelopment of non-vacant sites. As growth continues, the City will utilize both the Housing Element and its policies to create new housing near economic opportunity and transit. The following approved projects illustrate a past performance and the viability of developing non-vacant sites within Del Mar.

Table B-4: Example Development of Non-Vacant Sites for Residential Uses				
Project Address/ APN	Dwelling Units	Zoning	Use Prior to Redevelopment	Project Analysis
<u>941 Camino del Mar</u>	<u>11</u>		<u>Gas Station, Vacant</u>	<u>A mixed-use development with 2 low-income units</u>
<u>915 Camino del Mar</u>	<u>1</u>	<u>CC</u>	<u>Commercial Office, Retail, Restaurant</u>	<u>A commercial office/retail/restaurant with an added second story dwelling unit</u>
<u>320 11th Street</u>	<u>2</u>	<u>R2</u>	<u>Single Family Dwelling unit</u>	<u>A duplex development</u>
<u>1616 Camino del Mar</u>	<u>10</u>	<u>R2</u>	<u>Single Family Dwelling unit</u>	<u>Rezoned to Hotel Specific Plan to allow multiple dwelling units and short-term rental use</u>

Existing Use on Candidate Sites

Table B-5 shows the existing uses on each of the candidate sites identified to meet Del Mar’s RHNA need. The majority of the non-vacant sites identified are underutilized or are considered non-vacant per HCD’s standards. However, these lots have viable capacity for redevelopment. Each site was analyzed based on viability for redevelopment. The sites were evaluated based on:

- Parcel acreage
- Availability of land for residential development
- Existing use
- Accessibility to resources and transit proximity

Table B-5: Existing Uses on Candidate Sites (Identified to Meet RHNA)				
APN	Existing Building Square Footage	Maximum Buildable Area (Acres)	Remaining Buildable Area	Analysis
3010100100	<u>0</u>	<u>1.00</u>	<u>1.00</u>	<u>Privately-owned vacant land to meet lower income RHNA</u>
3010100200	<u>0</u>	<u>1.80</u>	<u>1.80</u>	<u>Privately-owned vacant lot with Tennis Court to meet lower income RHNA</u>
3003211400	<u>0</u>	<u>2.14</u>	<u>2.14</u>	<u>Privately-owned vacant land to meet lower income RHNA</u>
2982410600	<u>0</u>	<u>1.90</u>	<u>1.90</u>	<u>Privately-owned vacant lot with storage shed to meet lower income RHNA</u>
2982410700	<u>0</u>	<u>3.52</u>	<u>3.52</u>	<u>Privately-owned vacant lot with storage shed and paved driveway to meet lower income RHNA</u>
2982412900	<u>0</u>	<u>0.63</u>	<u>0</u>	<u>Privately-owned vacant land to meet lower income RHNA</u>
2982413400	<u>0</u>	<u>2.00</u>	<u>0</u>	<u>Privately-owned vacant land to meet lower income RHNA</u>
2982413500	<u>0</u>	<u>0.98</u>	<u>0</u>	<u>Privately-owned vacant land to meet lower income RHNA</u>
2982413600	<u>0</u>	<u>1.24</u>	<u>0</u>	<u>Privately-owned vacant land to meet lower income RHNA</u>
2991002800	NA	0.51	NA	<u>Construction storage/warehouse building to meet lower income RHNA</u>
2991002700	NA	0.90	NA	<u>Office buildings with associated parking to meet lower income RHNA</u>
2990710600	35,850	2.12	1.30	<u>Office building complex with associated parking to meet lower income RHNA</u>
2990710700	14,550	1.42	1.09	<u>Office building complex</u>
2991003000	996	0.38	0.36	<u>Small commercial beauty salon/office with associated surface parking to meet lower income RHNA</u>
3002223100	10,586	0.56	0.32	<u>Small commercial business/office with associated surface parking to meet lower income RHNA</u>
3002223300	NA	0.30	NA	<u>Office building with associated surface parking lot to meet lower income RHNA</u>
2990301200	<u>0</u>	<u>0.06</u>	<u>0</u>	<u>City-owned vacant lot to meet lower income RHNA</u>
3000931700	<u>0</u>	0.10	<u>0</u>	<u>City-owned vacant lot (part of overall City Hall complex) to meet lower income RHNA</u>
2982603500	NA	12.32	NA	<u>Horse stables for Del Mar Racetrack to meet lower income RHNA</u>
2982710300	NA	10.31	NA	<u>East main stable Parking lot and horse stables for the Del Mar Racetrack to meet lower income RHNA</u>
2990212000	NA	0.31	NA	<u>Privately-owned lot with Tennis court and green house -above moderate income</u>

Table B-5: Existing Uses on Candidate Sites (Identified to Meet RHNA)

APN	Existing Building Square Footage	Maximum Buildable Area (Acres)	Remaining Buildable Area	Analysis
3000910400	0	0.18	0.18	Privately-owned vacant lot used <u>as yard for two adjacent residential parcels – moderate income</u>
3003910800	2655	0.24	0.18	Single Family <u>Home and Yard on lot that allows duplex – above moderate</u>
2991421100	1561	0.29	0.25	Single-Family <u>Home with yard on lot that allows duplex – moderate income</u>
2991421300	4859	0.35	0.24	Single-Family <u>Home with yard on lot that allows duplex – moderate income</u>
2990726300	0	0.57	0.57	<u>Privately-owned vacant lot– above moderate income</u>
3010321100	NA	0.38	NA	<u>Non-conforming Car repair shop with associated parking in R1-14 zone zone – above moderate income</u>
2992006500	12985	5.53	5.23	<u>Subdividable large lot with Single-Family Home – above moderate income</u>
2992006300	NA	2.14	NA	<u>Subdividable privately-owned vacant lot with structure on it – above moderate income</u>
2992007100	2519	3.91	3.85	<u>Subdividable large lot with Single-Family Home – above moderate income</u>
2992006400	3823	6.95	6.86	<u>Subdividable large lot with Single-Family Home – Above moderate income</u>

Note: NA = data not available through local and online sources.

4. DEVELOPMENT OF SMALL SITE PARCELS

The City of Del Mar has identified 5 parcels that are smaller than half an acre in size and are planned to accommodate units affordable to lower income households. Assembly Bill 1397 identifies general size requirements for candidate housing sites designated to accommodate low- and very low-income units greater than half an acre and less than 10 acres in size.

Two of the “small site” parcels (2990301200 and 3000931700) are city-owned vacant lots that have been identified as part of the Sites Analysis to meet the lower income RHNA need. The City has total site control over these lots which means the City is able to facilitate development of small units for lower income households as needed during the 6th Cycle.

The remaining three “small site” parcels include 2236 Jimmy Durante Blvd (2991004900), 2148 Jimmy Durante Blvd (2991003000), and 807 Camino del Mar (3002223300). These parcels were chosen based on the zones allowable density per the 5th Cycle zone code amendments, interest from property owners, and staff insight of development opportunity. The parcels at 2236 Jimmy Durante Blvd and 2148 Jimmy Durante Blvd are located adjacent to one another and could be developed individually or consolidated. The owner for the parcel at 807 Camino del Mar confirmed that there are no limitations or restrictions that would prevent development of housing on their lot during the 6th Cycle and that they would be keeping their options open in consideration of what potential incentives and accommodations become available as a result of the housing programs. Program 1I (Streamlining and Incentives for Development of Lower Income Units) is

included in the housing plan to implement streamlining and incentives to facilitate development of lower income units on these parcels and other identified candidate sites. During the first year of the planning period the City will be conducting an economic study and zoning assessment to evaluate which permit processes (i.e. conditional use permits, lot consolidation) and development standards (i.e. floor area ratio, lot coverage, height) should be considered for incentives. Based on past performance and market trends it is likely for there to be interest in redevelopment of these parcels with multiple dwelling units and/or mixed use, particularly once the incentives become available.

Figure B-1: Map of Very Low and Low Income Sites

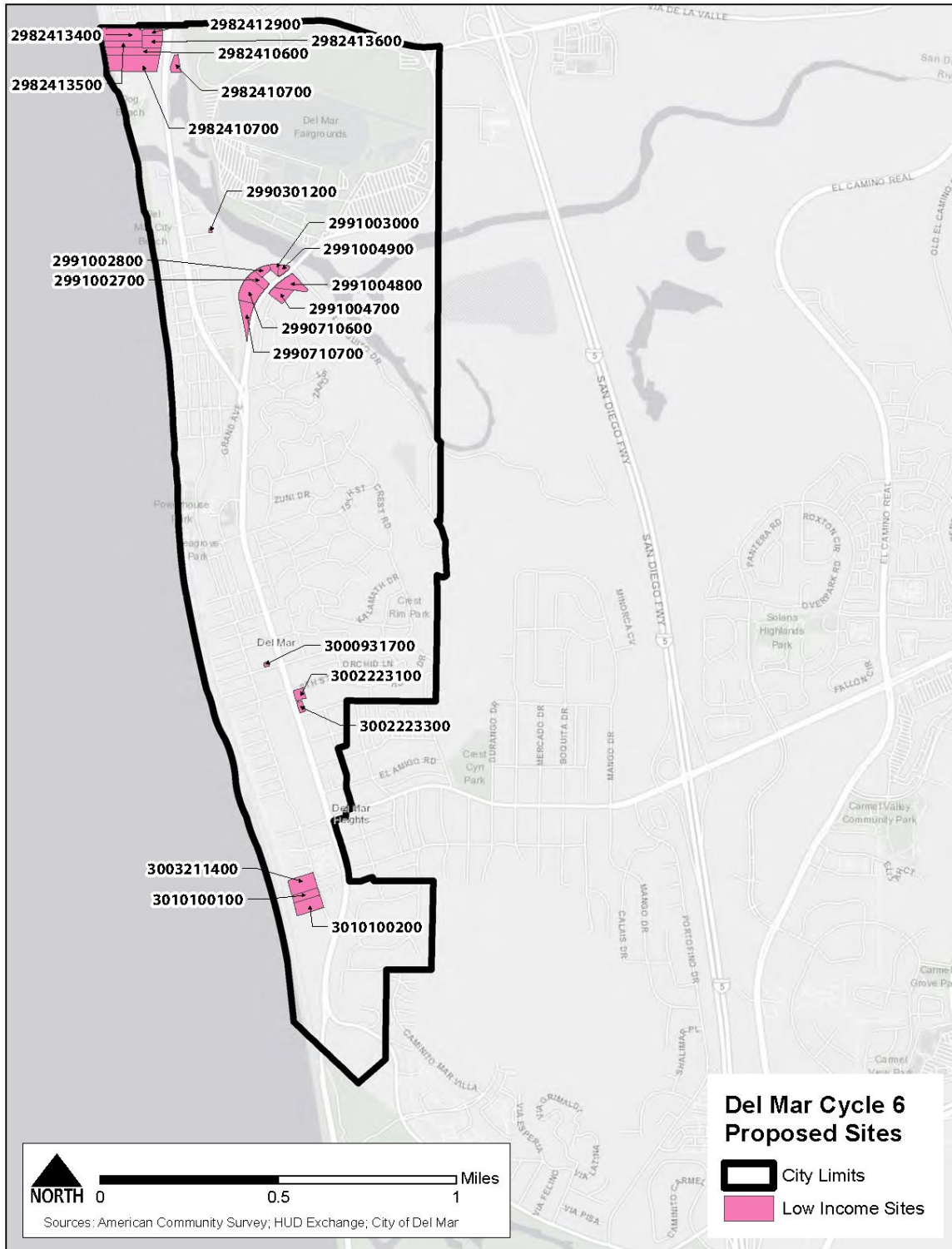


Table B-6: Low and Very Low-Income Sites

APN	Address	Gross Parcel Acreage	Net Parcel Acreage	Description (Existing Use)	Parcel Specific Comments	Ownership	Zone Designation	Overlay	Density	Potential Lower Income Units	Existing Use
Overlay Zones: Bluff, Slope and Canyon (BSC), Lagoon (LG), Open Space (OS), Urban/Wildland Interface (WUI)											
3010100100	Stratford Ct	1.00	0.90	Staver Family "estate property". PEIR Candidate site 98B	Existing private open space area. (Vacant)	Torrey Pacific Group	R1-40	BSC, HEI (Proposed)	20-25	4-5	Privately-owned vacant land
3010100200	Stratford Ct	1.80	1.62	Staver Family "estate property". PEIR Candidate site 98C	Existing private open space area. (Vacant)	Torrey Pacific Group	R1-40	BSC, HEI (Proposed)	20-25	7-9	Privately-owned vacant land with tennis court
3003211400	Stratford Ct	2.14	1.87	Staver Family "estate property". PEIR Candidate site 98A	Existing private open space area. (Vacant)	Torrey Pacific Group	R1-40	BSC, HEI (Proposed)	20-25	8-11	Privately-owned vacant land
2982410600	Border Ave	1.90	1.88	Collection of vacant parcels adjacent to the coast. (Coastal Bluff Overlay Zone) PEIR Candidate Site 1E	Vacant coastal bluff	Stensrud Lazier Holding Trust	R1-40	BSC HEI (Proposed)	20-25	8-10	Privately-owned vacant land with storage shed
2982410700	929 Border Ave	3.52	3.49	Nonvacant parcel in collection of identified vacant parcels adjacent to the coast. (Coastal Bluff Overlay Zone) PEIR Candidate Site 1F	Single-family residential parcel on a large lot	Stensrud Lazier Holding Trust	R1-40	BSC, HEI (Proposed)	20-25	19-24	Privately-owned vacant land with storage shed and driveway
2982412900	Camino Del Mar	0.63	0.63	Collection of vacant parcels	Vacant coastal bluff	Delfina Mar Development C	R1-14	BSC, HEI (Proposed)	20-25	2-3	Privately-owned vacant land

				adjacent to the coast. PEIR Candidate Site 1B								
2982413400	Border Ave	2.46	2.00	Collection of vacant parcels adjacent to the coast. (Coastal Bluff Overlay Zone) PEIR Candidate Site 1A	Vacant coastal bluff	Delfina Mar Development C	R1-14	BSC, HEI (Proposed)	20-25	9-12		Privately-owned vacant land
2982413500	Border Ave	1.21	0.98	Collection of vacant parcels adjacent to the coast. (Coastal Bluff Overlay Zone) PEIR Candidate Site 1C	Vacant coastal bluff	Delfina Mar Development C	R1-40	BSC, HEI (Proposed)	20-25	4-6		Privately-owned vacant land
2982413600	Camino Del Mar	1.24	1.24	Collection of vacant parcels adjacent to the coast. PEIR Candidate Site 1D	Vacant coastal bluff	Delfina Mar Development C	R1-40	BSC, HEI (Proposed)	20-25	5-6		Privately-owned vacant land
North Commercial Parcels												
2991002800	2126 Jimmy Durante Blvd	0.51	0.51	Light industrial uses	Existing warehouse buildings	Read Family LLC	NC	LG	20	2		Construction storage/warehouse building
2991002700	2120 Jimmy Durante Blvd	0.90	0.90	Office/Light industrial uses	Four existing offices buildings	Knorr Donna M Trust 06-24-92	NC	LG	20	4		Office buildings with associated parking
2990710600	2010 Jimmy Durante Blvd	2.12	2.12	Office uses	Existing office complex	Bungalows Del Mar LLC	NC	LG	20	8		Office building complex with associated parking

2990710700	2002 Jimmy Durante Blvd	1.42	1.42	Commercial/Office uses	Tradewinds Village Retail Center	Hinds Investments LP	NC	LG	20	6	Office building complex
2991004800	Jimmy Durante Blvd	1.55	1.55	Vacant Parcel	Vacant Parcel	Watermark D M LP	NC	BSC, LG	20	6	Privately-owned vacant land
2991004700	Jimmy Durante Blvd	1.13	1.13	Vacant Parcel	Vacant Parcel	Watermark D M LP	NC	BSC	20	4	Privately-owned vacant land
2991004900	2236 Jimmy Durante Blvd	0.42	0.42	Vacant Parcel	Vacant Parcel	Marten R T	NC	LG	20	1	Privately-owned vacant land
2991003000	2148 Jimmy Durante Blvd	0.38	0.38	Commercial/Office Uses	Small office business with surface parking lot	Matthews Erin M Separate Property Trust 11-23-16 Marten R T	NC	LG	20	1	Small commercial beauty salon/office with associated surface parking
Professional Commercial Parcels											
3002223100	853 Camino Del Mar	0.56	0.56	Commercial/Office uses	Existing office complex	Del Mar Building Group LLC	PC		20	2	Commercial/office building with associated surface parking lot
3002223300	807 Camino Del Mar	0.30	0.30	Commercial/Office uses	Existing commercial /office center with surface parking	Wuotan A LLC	PC		20	1	Office building with associated surface parking lot
City-Owned Parcels											
2990301200	28 th Street	0.06	0.06	Vacant Parcel	Vacant Parcel	City of Del Mar	RME	LG	10.9	4	City-owned vacant land
3000931700	10 th Street	0.1	0.1	Vacant Parcel Adjacent to City Hall Parking	City Hall Expansion Area C (Vacant)	City of Del Mar	PF			4	City-owned vacant land (part of overall City Hall complex)
State-Owned Parcels											

2982603500	2586 Jimmy Durante Blvd	12.32	12.32	Commercial/Fair ground uses	Multiple horse stables and related buildings	State of California	FR	Floodplain, LG		27	State-owned Horse stables for Del Mar Racetrack
2982710300	2587 Jimmy Durante Blvd	10.31	10.31	Commercial/Fair ground uses	Parking lot and multiple horse stables and related buildings	State of California	FR	Floodplain, LG		27	State-owned East main stable Parking lot and horse stables for the Del Mar Racetrack

B. 2 MODERATE/ABOVE MODERATE-INCOME CANDIDATE SITES INVENTORY

This section contains a description and listing of the candidate sites identified to meet the Del Mar's moderate and above moderate income RHNA need.

1. CALCULATION OF UNIT CAPACITY

The capacity of these sites was initially determined by multiplying the parcel size by the maximum achievable density for that zoning designation and rounding down to the nearest whole dwelling unit. Where information is known, acreage has been netted out for potential constraints to development.

2. SELECTION OF SITES

This Appendix B contains a selection of those sites that are most likely to be developed for moderate and above-moderate income housing. For the purpose of identifying sites with the potential to be redeveloped within the planning period, this analysis considered existing residentially zoned parcels within the following zones based on the permitted densities within those zones:

- ▶ Above moderate
 - R1-40, Very Low Density Residential
 - R1-14, Modified Low Density Residential
 - R1-10, Low Density Residential
 - R1-10B, Low Density Residential - Beach
- ▶ Moderate:
 - R1-5, Medium Density Single-Family Residential
 - R1-5B, Medium Density Single-Family Residential - Beach
 - RME, Medium Density Mixed-Use - East
 - RMW, Medium Density Mixed-Use - West
 - RMC, Medium Density Mixed-Use - Central
 - RMS, Medium Density Mixed-Use - South
 - R2, High Density

Due to the primarily developed nature of Del Mar's neighborhoods, sites with a capacity through the existing zoning to develop at least one additional unit were considered within the analysis. In most instances, additional units are achievable through the subdivision of an existing property and addition of dwelling units.

For the purposes of this analysis, accessory dwelling unit potential was calculated separately as outlined within the Candidate Sites Analysis Overview section above. ADUs represent additional potential units to meet the City's RHNA.

Figure B-2: Map of Moderate/Above Moderate Sites

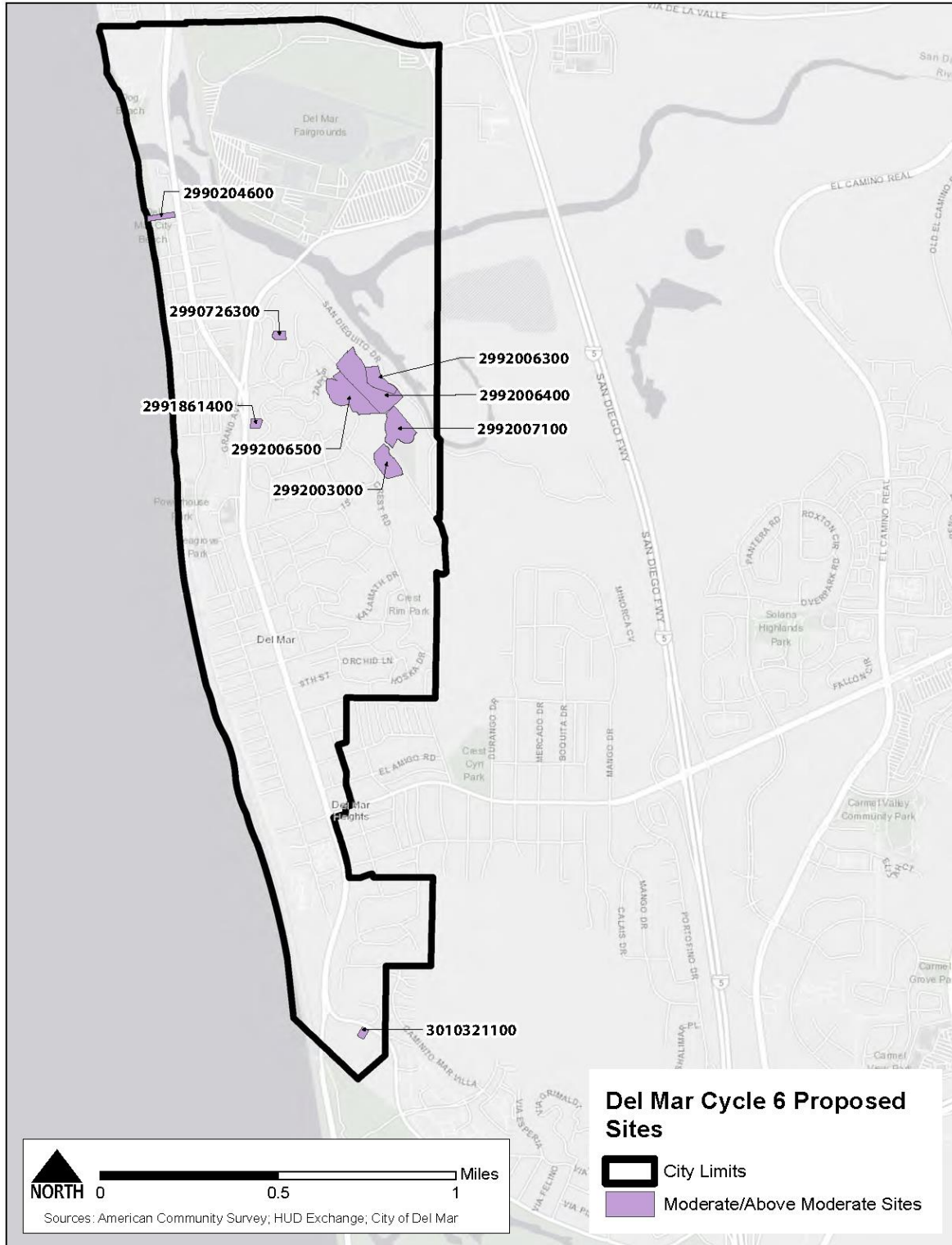


Figure Table B-57: Above Moderate Sites

APN	Address	Parcel Size (AC)	Description (Existing Use)	Parcel Specific Comments	Zone Designation	Overlay Zone	Density	Potential Units	Existing Use
Overlay Zones: Bluff, Slope and Canyon (BSC), Lagoon (LG), Open Space (OS), Urban/Wildland Interface (WUI)									
2990726300	2069 SEAVIEW AVE	0.57	Vacant	Part of residential single family but mostly vacant large lot	R1-10		4.3	1	Mostly vacant elevated parcel with driveway
2991861400	DEL MAR CA 92014	0.50	Vacant	Part of residential single family but mostly large lot	R1-10		4.3	2	Vacant
2990204600	2920 CAMINO DEL MAR	0.71	Residential Single Family	Backyard of Residential Single Family	R1-10B		4.3	1	Vacant
3010321100	155 CARMEL VALLEY RD	0.38	Non-conforming Commercial	Non-conforming autobody repair shop with rear parking	R1-14	BSC, LG, OS, WUI	3.1	1	Car repair shop with associated parking
2992006500	690 SERPENTINE DR	5.53	Residential Single Family	Residential Single Family with Large lot	R1-40	BSC, OS, WUI	1	1	Single-family residential homes with elevated roads leading to driveway
2992006300	SAN DIEGUITO DR	2.14	Vacant	Large lot with structure on it	R1-40	BSC, LG, OS, WUI	1	1	Large lot with small structure on it
2992007100	1810 SAN DIEGUITO DR	3.91	Residential Single Family	Residential Single Family with Large lot	R1-40	BSC, WUI	1	1	Residential Single-Family Home with large lot
2992003000	DEL MAR CA 92014	2.79	Vacant	Large vacant lot	R1-40	BSC, WUI	1	2	Vacant
2992006400	2100 GATUN ST	6.95	Residential Single Family	Residential Single Family with Large lot	R1-40	BSC, LG, OS, WUI	1	1	Residential Single Family with Large lot

Figure-Table B-86: Moderate Sites

APN	Address	Parcel Size (AC)	Description (Existing Use)	Parcel Specific Comments	Zone Designation	Overlay Zone	Density	Potential Units	Existing Use
Overlay Zones: Bluff, Slope and Canyon (BSC), Lagoon (LG), Open Space (OS), Urban/Wildland Interface (WUI)									
2990212000	2810 CAMINO DEL MAR	0.31	Residential	Tennis Court	R1-5B	FP	8.7	2	Tennis court near residential uses
3000910400	12TH STREET	0.18	Vacant	Vacant lot with existing trees and landscaping	R2		12.5	2	Backyard/storage use of neighboring residential parcels
3001740200	9TH STREET	0.18	Vacant	Vacant lot with existing trees and landscaping	R2		12.5	2	Vacant
3003910800	1230 LUNETTA DR	0.24	Single Family Residential	Single Family Residential with Yard	RMC		12.5	2	Single Family Residential with Yard
2991421100	1935 SANTA FE AVE	0.29	Single Family Residential	Single Family Residential with Yard	RMW		17.6	4	Single-Family Residential with yard
2991421300	1923 SANTA FE AVE	0.35	Single Family Residential	Single Family Residential with Yard	RMW		17.6	5	Single-Family Residential with yard

C. 3 22ND DISTRICT AGRICULTURAL ASSOCIATION (DAA)

The Del Mar Fairgrounds, which is approximately 370 acres of land area in north coastal San Diego County, is owned and operated by the 22nd District Agricultural Association (DAA), a State of California agency. Although around 80% of the Fairgrounds is in the City of Del Mar, the City as a municipality has no authority to approve/disapprove development or activities held on the Fairgrounds property. The Fairgrounds is governed by a Board of Directors, each of whom is appointed by the Governor.

Despite ownership by the State of California, the Del Mar Fairgrounds presents an opportunity for the development of lower income housing that can potentially help to meet the housing needs of current and future residents of Del Mar. As part of the policy program established within the Housing Element (see **Program 3A**), the City will actively pursue partnership and development agreement opportunities with the 22nd DAA Fairgrounds to accommodate lower income housing within the fairgrounds property. If successful, the development of housing at deed-restricted lower income affordability levels will assist with meeting the City's lower income RHNA need and can help the State provide on-site workforce housing that supports the Fairgrounds operations.

Development of affordable housing at the Del Mar Fairgrounds site would require a development agreement and memorandum of understanding (MOU) between the State of California, the City of Del Mar, and likely an affordable housing developer. As this agreement does not currently exist, the City cannot rely on the potential for development within the State Fairgrounds as adequate sites to meet the City's RHNA need. Therefore, the contingency rezone plan in the Housing Element (see Program 1E) is included in the City's list of adequate sites to meet the City's lower income RHNA need as set forth in **Table B-1**.

In anticipation of an agreement similar to the one described above; the City has conducted a preliminary analysis of the State Fairgrounds property to determine the potential dwelling unit yield. Integration of new housing development can take many forms and configurations to blend with the existing on-site uses and within the Del Mar community. The State Fairgrounds property is located within a short walking distance of the City's downtown village center, Del Mar's public parks and beach, and public transit.

It is assumed that prospective housing development on this site will occur at a minimum density of 20 dwelling units per acre. Through analysis of the State Fairgrounds property and input by the Citizen's Task Force, it is estimated that approximately 24 acres of the 370-acre property may be developable for residential uses without interrupting the existing on-site racetrack facilities and annual Del Mar Fair event areas. This yields a potential housing development capacity of approximately 480 dwelling units.

As stated within the Housing Element goals, the City is committed to vigorously pursuing an agreement to develop housing on the Del Mar Fairgrounds property and has developed **Program 3A** to identify actionable objectives that will lead to the timely development of affordable housing for lower income households. Further, as part of that agreement, the City's objective is to confirm that any affordable units developed on the State Fairgrounds property will be able to count towards meeting the City's lower income RHNA.

Table B-97: Potential Residential Capacity within the Del Mar Fairgrounds

	Gross Acreage ¹	Net Acreage	Targeted Number of Lower Income Units
Del Mar Fairgrounds	220.45	5.65	54
1. The Gross Acreage calculation includes only parcels within the fairgrounds property where it is anticipated that future housing may occur with minimal disruption to existing uses.			



WATERMARK
DEL MAR

December 2, 2019

Planning Commission Members
City of Del Mar
1050 Camino Del Mar
Del Mar, CA 92014

RE: December 3, 2019 Planning Commission Meeting, Item 2
ZA 18-002
GPA 19-002
LCPA 19-001

Dear Planning Commission Members:

Please review the attached correspondence dated March 14, 2019, and the associated petition from the majority of the NC and PC Zone property owners regarding the above-referenced amendments. The recommendations outlined on page 2 of the March 14, 2019 letter continue to be ignored.

We strongly urge you to take the necessary action to include modifications to the development standards in order to incentivize the construction of new housing units in the NC and PC Zones. We have outlined on page 2, seven specific recommendations for your consideration. Recommendations 1, 3, 4, 5, and 6 are critical to achieving the goals outlined in the Housing Element.

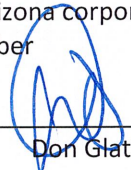
Continuing to apply the antiquated development standards found in the NC and PC Zones is seriously flawed. The rationale and recommendations for new development standards is clearly outlined in the March 14, 2019 letter.

We respectfully request your sincere reassessment of the proposed amendments in order to address numerous flaws and take the appropriate action to meet the Housing Element goals.

Watermark DM, L.P.,
an Arizona limited partnership

By: Watermark Del Mar, LLC
an Arizona limited liability company,
Its: General Partner

By: Kitchell Development Company,
an Arizona corporation
Its: Member

By: 
Don Glatthorn
Senior Vice President

c: Mayor Haviland
City Council Members
Shaun McMahan

March 14, 2019

Shaun McMahon
City of Del Mar
1050 Camino Del Mar
Del Mar, CA 92014

RE: Professional Commercial and North Commercial Zoning Code Amendments

Dear Shaun:

This letter provides program and EIR scope inputs on the above-referenced zoning code amendment from the undersigned collaboration of property owners in the NC and PC Zones.

As property owners in the NC and PC Zones, we are vital stakeholders who will be subject to any zoning code amendments affecting those zones that are adopted by the City of Del Mar. We appreciate the challenge the City faces in balancing community character concerns with the need for increased densities in order to fulfill the goals of the Housing Element. Our intention is to proactively support the City's efforts to modify these zones in order to achieve more market rate and affordable housing opportunities within Del Mar. We also recognize that the process for evaluating such changes in land use involves substantial costs in staff resources and consultant time for the EIR preparation. Therefore, we believe it is important to enact a zoning amendment that will support your goal of promoting the construction of new housing units. Our concern is that focusing only on adding residential as an approved use (without concurrently addressing development standards) will result in an EIR that may be insufficient to address the effects of the proposed zoning code amendments. (*See, City of Del Mar Community Plan Housing Element, p.46, stating: "In addition, the City will review its development codes to establish appropriate development standards for facilitating higher density residential development."*)

Without modifications to the development standards, it is unlikely that the currently proposed zoning amendment will be sufficient to incentivize the actual construction of new residential units. Additionally, converting market rate commercial space to affordable residential space is a substantial reduction in value and will serve as a disincentive to building residential units. The goal of promoting constructed affordable units requires incentives, not disincentives. Furthermore, the removal of location-specific constraints cannot be accomplished without consideration of modifications to the development standards.

We encourage you to take a comprehensive approach to the zoning code amendment process by determining appropriate development standards as part of the project scope that specifically address known constraints and physical challenges. Below are some suggestions for standards to be considered. The City could study additional options as part of the EIR process. Regardless, we feel incorporating such standards and parameters for future development is critical to completing an EIR that can properly address the effects of the proposed amendment. Our recommendations are as follows:

1. Add residential as a permitted use “by-right” without a CUP requirement in the NC and PC Zones. Any residential use shall require that 20% of the market-rate units be set aside for affordable housing. The minimum size of an affordable unit shall be 400 square feet with no additional requirements for sizes of units.
2. Allow a project to be 100% commercial or 100% residential or any mix of commercial and residential uses.
3. Evaluate the potential of increasing FAR allocated for NC commercial to be consistent with the existing PC zone of 0.60 and allow for additional residential FAR up to 1.0 for a mixed use project or 100% residential project. This should be applicable in both the NC and PC Zones.
4. Consider increasing lot coverage for mixed use and 100% residential projects to 0.90 in both the NC and PC Zones.
5. Allow properties within the 100 Year Flood Plain in the NC Zone to measure maximum height limits from two feet above the base flood elevation, or elevation 20, when existing grade is below elevation 20.
6. Evaluate the potential for increasing height above two stories and 26 feet high in appropriate locations.
7. Evaluate parking requirements including the potential for on-street parking within the public right of way to support on-site parking requirements.

Adopting zoning code amendments which include the above recommendations will provide significant and meaningful incentives to produce affordable and market rate housing units pursuant to the goals and programs of the Housing Element. For reference, we have included an evaluation of development standards on similarly zoned sites in neighboring cities and Del Mar which are as follows:

Neighboring City Commercial & Mixed Use Zones

- Solana Beach FAR: 1.20 (“C” Zone)
- Encinitas FAR: 1.0 (“GC/VSC” Zones)

Current Del Mar Zone with Highest Density

- Del Mar RM West Zone: FAR 0.45 @ 17.6 units/acre, Lot Coverage: 0.60

Proposed New City of Del Mar NC and PC Zones

- Del Mar Proposed NC Zone: FAR 0.30 @ 20 units/acre, Lot Coverage: 0.40
COMMENT: FAR is significantly below neighboring cities and significantly below existing Del Mar RM West Zone at only 17.6 units/acre.
- Del Mar Proposed PC Zone: FAR 0.60 @ 20 units/acre, Lot Coverage: 0.75
COMMENT: PC Zone is currently built out, FAR increase will be necessary to obtain housing units.

We urge you to revise the project details to be evaluated by the EIR in order to analyze the data correctly the first time, and provide meaningful input to the City Council in making decisions regarding this proposal.

Respectfully,

c: City Council
 Planning Commission

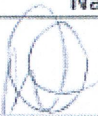
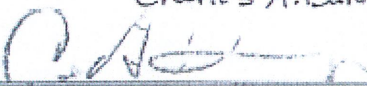
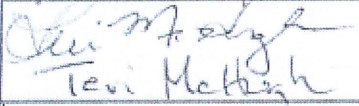
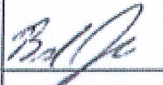
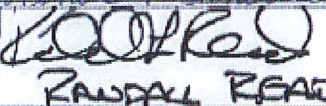
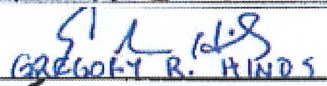
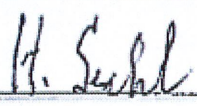
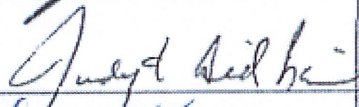
Name/Signature	Ownership Name	Property APN or Address
 Tom Glatthorn Charles A. Dunn	Watermark IM, LP	299-100-47 299-100-48
	Del Mar Bldg Group LLC	300-222-31-00
 Teri Matheson	2201 Del Mar LLC	299-100-34-00 2201 San Diegoita Drive
 BRAD JOHNSON	Harbor Associates	299-071-06-00 2010 Jimmy Durante Del Mar
Pamela Stonebreaker Pamela K. Stonebreaker	Pamela K Stonebreaker TRUST	299-100-29-00 2137 Jimmy Durante Blvd, Del Mar 92014
 RANDALL READ	READ FAMILY LLC	299-100-28-00 2126 Jimmy Durante Blvd
 GREGORY R. HINDS	HINDS INVESTMENTS L.P.	299-071-07-00 2002 Jimmy Durante
 H. Seibel	Wuotw LLC 300-222-33-00	807-823 Camino Del Mar
 Oceans 8 View	Oceans 8 View	322 8th St. Del Mar Ca. 300-222-32-00
Donna Knorr DONNA KNORR	DONNA M KNORR 1992 TRUST	2126 JIMMY DURANTE BLVD DEL MAR CA 92014 299-100-27-00

Exhibit D

	Program (and time frame)	Action
1	1A North Commercial (by June 2022)	Finalize Coastal Commission certification of local approvals gained during 5 th Cycle to allow 20 du/ac on select parcels (ordinance/LCPA)
2	1B Professional Commercial (by June 2022)	Finalize Coastal Commission certification of local approvals gained during 5 th Cycle to allow 20 du/ac (ordinance/LCPA)
3	1C Central Commercial (by April 2024)	Amend the CC Zone to allow 20 du/ac (plan amendment and ordinance/LCPA)
4	1D Economic Study and Affordable Housing Overlay Zone (Economic study by December 2022; overlay by December 2025 if needed)	Conduct economic study and zoning assessment. Evaluate whether to create overlay zone. Involves coordination with stakeholders (hotels, Plaza, multi-dwelling in RM zones), and present findings to City Council. If City has not secured at least 30 affordable units by December 2025 must proceed with overlay zone. (economic study; potential ordinance/LCPA)
5	1E Rezone of Vacant Land on North Bluff/South Stratford Properties (This contingency program is required only if Program 3A is not timely implemented by December 2024)	If City is unable to timely reach agreement with Fairgrounds, then must implement rezone to 20-25 du/ac by right via overlay zone to create capacity for at least 54 lower income units. (potential plan amendment, ordinance/LCPA)
6	1F Manufactured Housing (by December 2023)	Update needed per State law (ordinance/LCPA)
7	1G Density Bonus (by December 2023)	Update needed per State law (ordinance/LCPA)
8	1H Public Facilities Zone (28 th Street Clean-up Rezone/LCPA by December 2022; Zone Amendment by December 2024)	Process clean-up Rezone/LCPA for 28 th Street lot by December 2022. Amend PF zone by December 2024 to allow residential as primary use to accommodate affordable housing. (ordinance/LCPAs)

<p>9</p>	<p>1I Streamlining and Incentives for Affordable Housing (Economic study/zoning assessment by December 2022; and Ordinance/LCPA by December 2024)</p>	<p>Conduct economic study and zoning assessment. Evaluate existing regulations and identify potential changes to remove constraints as necessary to facilitate affordable housing. (Economic study/zoning assessment and ordinance/LCPA)</p>
<p>10</p>	<p>1J Establish Program for Coordination with Affordable Housing Developers (by December 2022)</p>	<p>Establish new program for regular outreach with San Diego Housing Federation and affordable housing developers. Use for mutual benefit to gain insight towards development of realistic strategies to facilitate affordable housing, including strategies that can work at the Fairgrounds. Coincide initial outreach with economic study for Programs 1D, 1I, 2A, and 3A (program for outreach/meetings)</p>
<p>11</p>	<p>2A Extend and Enhance ADU Pilot Program - Incentive Program (Ordinance to extend program by May 2022; Economic study/zoning assessment by December 2022; Ordinance to add incentives/modify program by December 2023)</p>	<p>Process an extension of the current incentive program by May 2022. Prepare an economic study and zoning assessment. Process ordinance to incorporate additional incentives and/or program modifications to increase participation in the program. (Ordinance to extend ADU Incentive Program, Economic study/zoning assessment, Ordinance to add incentives/modify program)</p>
<p>12</p>	<p>2B ADU Amnesty Program (by December 2023)</p>	<p>Establish ADU Amnesty Program to allow owners with unpermitted ADUs to legalize the ADUs so that the City can count them toward its inventory (ordinance)</p>
<p>13</p>	<p>2C Promotion of Deed-Restricted Low Income ADUs (by December 2023)</p>	<p>Develop outreach materials to promote deed restricted low income ADUs with goal to reach at least 15 low income ADUs to meet RHNA (web update/outreach)</p>
<p>14</p>	<p>2D Tracking of ADU Progress (ongoing annual actions)</p>	<p>This is done as part of Annual Progress Reports (spreadsheet tracking & reports to Council)</p>
<p>15</p>	<p>2E Mid Cycle ADU Production Evaluation (by April 2025)</p>	<p>Process additional amendments if needed to spur production of ADUs for low-income households (spreadsheet tracking & potential ordinance)</p>

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16	<p>2F Tiny Houses (by December 2023)</p>	<p>Process ordinance to clarify tiny houses are allowed per ADU regulations and identify additional circumstances where tiny houses can be allowed. (ordinance/LCPA)</p>
17	<p>3A Agreement with State to Build Affordable Housing Units on State Fairgrounds property (Economic study/Assessment by December 2022; MOU and binding agreement by December 2024)</p>	<p>Conduct economic study of market conditions, assessment of multi-unit product types, and identify potential funding sources. Initiate process to secure agreement with 22nd District Agricultural Association (DAA) and affordable housing developer. Identify how housing will count towards RHNA. Binding agreement due by December 2024 or else contingency rezone (Program 1E) will be required. (development agreement, MOU, RFP)</p>
18	<p>4A Residential Care Facilities (by December 2023)</p>	<p>Process ordinance for compliance with State law (ordinance/LCPA)</p>
19	<p>4B Emergency Shelters, Transitional Housing and Supportive Housing, and Low Barrier Navigation Centers (by December 2023)</p>	<p>Process ordinance for compliance with State law. Develop procedures to connect public with resources. (ordinance/LCPA and policy/procedures)</p>
20	<p>4C Shared Housing Program (ongoing)</p>	<p>Continue to offer shared housing program/free roommate referral services via Del Mar Community Connections (outreach)</p>
21	<p>4D Inclusionary Housing Ordinance (by December 2024)</p>	<p>Process amendments for compliance with State law (ordinance)</p>
22	<p>4E Condominium Conversions (by December 2024)</p>	<p>Continue to implement existing processing requirements of Subdivision Map Act and mitigation requirements per DMMC 24.21.025 (publish procedure/amend ordinance with Program 4D)</p>
23	<p>5A Monitor the Renovation and Improvement of existing Multi-Unit Structures with Non-Conformities (ongoing)</p>	<p>Continue to allow retention of non-conforming structures with three or more units to renovate and make improvements to these existing multiple dwelling unit structures. Monitor the number of projects that utilize this program and identify the number of units</p>

Exhibit D

		conserved or rehabilitated where applicable. (publish procedure)
24	5B Require Housing Impact Statement in Reports (by January 2022)	Establish policy and implement (policy/procedure)
25	5C Preserve Existing Housing Stock/Short Term Rental Controls (Ordinance by December 2024)	Continue to establish policies and programs that more effectively address regulations for short term rentals as a means to preserve long term housing stock (ordinance/LCPA)
26	6A SB 35 Streamlining – Notice of State Law Exemption for Coastal Cities (by January 2022)	Provide notice to the public that the City of Del Mar is a coastal city that is exempt from SB 35 (post notice on web page)
27	6B Affirmatively Furthering Fair Housing per AB 686 (ongoing annual reporting requirements)	Participate in regional efforts, partner with organizations to review and refer discrimination complaints, and implement various actions. (outreach and funding)
28	6C Continue Data Collection and Compliance with the Coastal Act and Housing Element-Related Requirements applicable to the Coastal Zone, including State-Mandated Accommodation of Housing Development Capacity (ongoing annual reporting requirements)	Continue to collect data and maintain records regarding affordability. Work with the Coastal Commission and HCD to “harmonize” the Coastal Act and State Housing laws and identify a strategy to best accommodate future development capacity as assigned to the City for the 6th Cycle. (spreadsheet tracking and annual reports)
29	6D Solar Panel Installation Partnership (by December 2024)	Partner with Renewable Cities San Diego to install solar on housing for lower income households (resolution)
30	6E Environmental Justice Element (by December 2022)	Process Community Plan Amendment to establish policies to reduce community health risks and address Affirmatively Furthering Fair Housing Issues per Assembly Bill (AB) 686. (General Plan Amendment)

31	<p>6F Vote Threshold for Housing-Related General Plan Amendment</p> <p>(by December 2025)</p>	<p>Explore whether to modify local vote threshold for super majority to apply State’s simple majority</p> <p>(study and potential ordinance/public vote)</p>
32	<p>6G Objective Design Standards</p> <p>(by June 2023)</p>	<p>Prepare and process objective design standards for housing that is eligible for by-right processing</p> <p>(ordinance)</p>
33	<p>7A Housing Funding Resources Including Housing Assistance and Housing Reserve Funds</p> <p>(ongoing)</p>	<p>Continue to make funds accrued in the Housing Assistance Reserve fund available for affordable housing. Continue to support the existing tenants participating in the local rental subsidy program until they leave the program. Transition City assistance towards investment in the development of an equivalent number of permanent affordable housing units (four units for lower income households).</p> <p>(annual report to City Council with budget)</p>
34	<p>7B Interfaith Partnership Opportunities</p> <p>(ongoing)</p>	<p>Continue to encourage inter-faith shelter network rotating shelter and St. Peter’s Helping Hands</p> <p>(annual report to City Council with budget)</p>
35	<p>7C Resources for Persons with Disabilities</p> <p>(ongoing)</p>	<p>Publish a resource list of programs and opportunities for persons with disabilities</p> <p>(updated list to be published within 3-6 months of ordinances processed per Programs 4A and 4B)</p>
36	<p>7D Housing Choice Voucher Program</p> <p>(ongoing)</p>	<p>Contract with the County of San Diego for Housing Choice Voucher Program</p> <p>(resolution to process contract)</p>
37	<p>7E Fee Waiver Program</p> <p>(ongoing)</p>	<p>Continue the fee waiver program</p> <p>(resolution to extend fee waiver if needed)</p>
38	<p>7F Monitor and Respond to Complaints of Constraints to Housing for Lower Income Households and Persons with Disabilities</p> <p>(ongoing)</p>	<p>Monitor and respond to complaints of constraints to housing for lower income households and persons with disabilities such as impediments to maintenance, improvement, or development of such housing.</p>

Exhibit D

		Continue to work with local non-profits to connect people with assistance and resources. (annual report to City Council with budget)
39	7G Senior Housing Resources and Assistance (ongoing)	Continue to partner with Del Mar Community Connections (resolution to extend contract)
40	7H Student Housing Resources and Assistance (ongoing)	Connect students with affordable housing options in Del Mar, including ADUs (outreach/resource list)
41	7I Database of Community Assistance Programs (ongoing)	Maintain list of community assistance programs (resource list)