



June 15, 2021

RE: Dana Point Draft 6th Cycle Housing Element – Agenda Item #12

Dear Mayor Federico, Mayor Pro Tem Muller, and Councilmembers Frost, Viczorek, and Villar and Planning Commissioners Dohner, McKhann, Murphy, Nelson, and Opel,

The Welcoming Neighbors Home (WNH) Initiative is a ministry of Tapestry, a Unitarian Universalist Congregation. Our members live in cities throughout South Orange County, including Dana Point. As concerned citizens, we work to serve and advocate for people who are experiencing homelessness, who are at risk of losing their homes, and those with low incomes who live and work in our communities.

We are following up on our earlier submitted public comment (dated April 26, 2021) regarding Dana Point's draft 6th Cycle Housing Element (see attached).

Three important process requests up front.

- 1) **Please use a track changes method as your team goes through its DRAFT revisions** so content changes can be apparent to the reader.
- 2) Can you **provide us with an electronic file of the site inventory**, i.e., a spreadsheet so we may conduct our own analysis?
- 3) **We are requesting confirmation from the City that it will allow a public review period of at least 30 days before any version of the revised Housing Element (HE) – either the Draft HE or FINAL HE – is transmitted to HCD.** The city should publicly announce the dates for the commencement and end of the review period.

We have a number of **programmatic/policy requests and recommendations** related to the draft housing element.

1. Inclusionary Housing Policy:

To ensure that there is an adequate supply of housing for residents with extremely- low and very-low incomes, **we recommend that the city adopt an inclusionary housing policy that would require 15% affordable units in any new housing development, with 5% for extremely- low**

income, 5% for very- low income and 5% for low income. We also recommend an in-lieu fee of \$10 to 15 per square foot to encourage the building of more affordable units that are integrated with moderate income housing. These figures are supported by an [EPS analysis](#) done for your neighboring city of San Clemente. **We ask that this type of inclusionary housing policy, which includes attention to extremely-low, very-low and low-income categories, be applied to the upcoming Doheny Village redevelopment, and all future entitlements.**

2. Affirmatively Furthering Fair Housing (AFFH)

We commend the city on its first draft as it relates to the AFFH analysis considering it was only very recently that the California State Office of Housing and Community Development (HCD) issued its [AFFH Guidance](#).

We note that the city has not identified any opportunities for development of affordable housing in high or moderate resource areas. All Housing Opportunity Sites are located within low resource areas. We encourage the city to look for opportunities to affirmatively further fair housing by identifying creative ways to provide affordable housing for lower income households in high opportunity areas. Options to achieve this may include:

- A. Upzoning of single-family neighborhoods
- B. Upzoning of affluent neighborhoods
- C. Removal of non-zoning constraints to multifamily housing

3. Review of Proposed Programs

A. Program Category #1: Identify Adequate Sites for a Variety of Housing Types

1. We commend the city for its thorough analysis of potential sites for housing development and for allocating all of the vacant land to lower income housing.

2. Given the relatively low amount of housing that exists in Dana Point for those with limited incomes (e.g. retail workers and seniors on fixed incomes – those categorized as extremely low, under \$30K per year) or very- low income, under \$50K per year), **we ask that more of the proposed Under Utilized Land Sites be allocated for lower income instead of moderate income housing. For example, shift 100 of the Under Utilized Land sites from moderate to lower income – so that 308 would be for Lower Income and 110 would be for Moderate Income.**

3. We are supportive of the city's plans to zone for more ADUs. **Please let us know your specific plans for how you will monitor affordability levels on any new ADUs.**

B. Program Category #2: Assist in the development of affordable housing

- 1) **Program 2.1 – Rental Assistance:** Please outline more specific plans for how the city will achieve this objective so that we will know when this work is done: "Connect interested landlords and qualifying tenants with the OCHA Program Administrator.

Coordinate with FHC to promote expanded use of vouchers for Dana Point residents to reduce the rate of overpayment in target areas and for target households.”

- a) **We recommend that the City work with United Way to bring their [Welcome Home OC](#) program to Dana Point.** This program is a landlord incentive program that provides financial incentives such as double security deposits, sign-on bonus, holding fees, and other assurances for landlords who rent units in Orange County to individuals, Veterans, and families with a housing voucher. The program is a joint effort between the United to End Homelessness initiative, Orange County United Way, Public Housing Authorities, and rental property owners to reduce the time involved in the search for housing by increasing the availability of rental units.
- 2) **Program 2.2 – Mortgage Assistance:** Please outline a more specific plan for connecting qualifying homebuyers with the County of Orange MCC and MAP Program Administrator.
 - 3) **Programs 2.3 to 2.6:** In general we are supportive of these programs: Program 2.3 – Housing Initiative, Program 2.4 – Conversion to Affordable or Permanent Supportive Housing, Program 2.5 – In-lieu Fee Program and Program 2.6 – Orange County Housing Finance Trust. That said:
 - a) **We request that Program 2.4 be made more robust by implementing plans that would result in even more existing housing being converted to affordable housing for people with *extremely-low incomes* and to more *permanent supportive housing*.** (Relatedly, we are very supportive of Program 3.6 – Supportive Housing.)
 - b) Program 2.5 – In-lieu Fees – As noted above **we recommend that the City adopt an Inclusionary Housing policy and an associated in-lieu fee structure to ensure that affordable housing is integrated in with market rate housing.** We recommend that the City **partner with non-profit affordable home developers** and use some of the in-lieu fees to provide gap funding that would qualify as important local matching funds that can be leveraged for state and federal funding, and private investment.
- C. Program Category #3:** Remove governmental constraints to the maintenance, improvement, and development of housing. We are supportive of the strategies listed. **We request more information about the city’s parking policies** because we understand that parking policies can influence the cost of affordable housing.
- D. Program Category #4:** Conserve and improve the condition of the existing stock of assisted housing. None of the elements of this program include interim milestones. **We request that the next 6th cycle housing element draft be more specific with regard to specific activities and milestone dates for improving the condition of existing stock of affordable housing.**

E. Program Category #5: Preserve existing affordable housing developments. None of the elements of this program include interim milestones. **We request that the next 6th cycle housing element draft be more specific with regard to specific activities and milestone dates for preserving existing assisted housing.** As noted above, one particular area of concern is the monitoring of the affordability of new ADUs. However, we are interested in the city diligently monitoring and addressing the need for the affordability of all housing stock.

F. Program Category #6: Promote equal housing opportunities for all persons. **We request that the next 6th cycle housing element draft be more specific with regard to specific activities and milestone dates for promoting Fair Housing.** Below are some examples of where we'd like more detail. However, in general we hope to see more detailed plans outlined in the entire housing element.

- 1) Program 6.1 - Fair Housing Services: We would like to see more specific and proactive plans with interim milestones. For instance, beyond listing information on the city website, the city should take active steps to educate the community about such things as housing discrimination and tenant rights. We note there are plans for community education programs. **What programs are planned, how many, and when? How often will city websites be updated to reflect information about fair housing services?**
- 2) Program 6.2 - Affirmatively Furthering Fair Housing: **We would like to see this program more fully outlined before 2023.** The objectives look admirable, but **we'd like to know specifically the steps that will be taken to achieve them. What activities are planned and when?**
 - a. As an example, to be illustrative, we'd like a more proactive approach implemented – like in-person educational sessions and outreach to community groups about fair housing opportunities rather than just “Distribute materials in English and Spanish through City Hall, City libraries, City websites, and the Fair Housing Council website.” We recommend that the City also do in-person outreach to those who do not have access to computers or the skills to find information online.
 - b. What are the specific numbers of residents the city plans to recruit with regard to the objective of: “Actively recruit residents from neighborhoods in low resource areas to serve or participate on boards, committees, and other local government bodies.”?
- 3) **For Program 6.3: How many senior home assessments does the city plan to do and when?**
- 4) **More specific plans and milestones are needed for Program 6.4: Housing Resources Assistance and Program 6.5: Housing for Persons with Disabilities.**

We look forward to receiving a response to our questions noted above and to seeing the next version of the Dana Point 6th Cycle Housing Element. In the meantime, if you have any questions of us, please feel free to contact Rona Henry at 609-216-1784 or at rona.s.henry@gmail.com.

Sincerely,

Rev Kent Doss, Minister
Tapestry, a Unitarian Universalist Congregation

Rona Henry, Chair
Welcoming Neighbors Home Initiative

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