



City of Del Mar

May 21, 2019

SANDAG Regional Housing Needs Assessment Subcommittee
Attention: Seth Litchney, Senior Regional Planner
401 B Street, Suite 800
San Diego, CA 92101

RE: RHNA Methodology

Dear Regional Housing Needs Assessment Subcommittee:

On May 20, 2019, the Del Mar City Council met at its regularly noticed meeting to review the most recent Regional Housing Needs Assessment (RHNA) Subcommittee direction and provide comments to assist you in determining the RHNA methodology.

The City of Del Mar supports the recommendation of at least 65% of the allocation being derived from proximity to high-efficiency transit lines. This will aid the overall reduction of greenhouse gasses in the region and support transit as the desired mode of transportation. Higher percentages, such as a 75% allocation, would reinforce this commitment.

The City of Del Mar also supports an allocation of 35% or less to jobs, with an emphasis on a jobs/housing balance. However, there is concern on the jobs and employment data that is currently used by SANDAG to provide the calculation.

SANDAG should utilize jobs/employment data that reflects full time or full time equivalent jobs rather than total jobs. Currently, the calculation appears to include part-time jobs in its total count. For cities such as Del Mar, with a large seasonal employer (Del Mar Fairgrounds) within its city limits, the housing allocation derived from the jobs/employment data are disproportionately assigned. As an example, the most recent decennial census assigned 2,484 jobs to the City, which remained consistent over the prior ten years. However, the current RHNA calculation assumes 4,484 jobs for Del Mar, which includes approximately 1,200 jobs from the Del Mar Fairgrounds, many of which are part time or seasonal. We encourage SANDAG to use a jobs calculation that does not count seasonal and part time workers and instead use a full time equivalent (FTE) calculation to project the housing need.

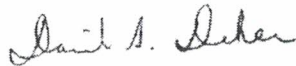
The City of Del Mar recognizes the intent of the equity adjustment in order to better spread the affordable housing throughout the region. However, this method does not take into consideration the overall goal of implementing the maximum number of feasibly constructible units in the region. The cost of building affordable housing, land values and urban land availability should also be considered. Incorporating these factors into a revised equity methodology would better mitigate the gap between an equal spread that corresponds to the RHNA determination and the proposed equity adjustment.

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The City of Del Mar recognizes the difficulty that each jurisdiction will have to meet the RHNA allocation, especially in Del Mar which is a built-out residential community with little to no development potential and a population that has continually declined by nearly 20% in the last thirty years.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "David A. Druker".

David Druker
Mayor

Cc: City Council, City of Del Mar
Scott W. Huth, City Manager
Kathleen A. Garcia, Planning and Community Development Director