



REPORT

DATE ISSUED: April 4, 2003

ITEM 101

REPORT NO.: HCR03-029
For the Agenda of April 11, 2003

SUBJECT: City of San Diego's FY04 Action Plan for Community Development
(Citywide)

SUMMARY

Issue: Should the Housing Commission recommend that the Land Use & Housing Committee approve the City's Draft FY04 Annual Action Plan for Community Development, Attachment 2, for submission to the U.S. Department of Housing and Urban Development (HUD)?

The FY04 Action Plan submission is the application for federal funds for the following four HUD FY04 formula-based programs: Community Development Block Grant (CDBG); Emergency Shelter Grant (ESG); HOME Investment Partnerships (HOME); and Housing Opportunities for Persons with AIDS (HOPWA).

Recommendation: Recommend Land Use & Housing Committee approval of the City's FY04 Action Plan for Community Development for submission to HUD.

Fiscal Impact: None with this action; however, without a final HUD approved FY04 Action Plan, the City will be ineligible to receive approximately \$30.8 million in federal funds that support affordable housing and community/economic development activities for FY04.

Affordable Housing Impact: None with this action; however, the FY2001-2005 Consolidated Plan sets an estimated goal of providing an additional 1,500 low-income households with affordable housing services, during each of the fiscal years of the reporting period.

Previous Related Action(s): The City Council approved the City's FY2001-FY2005 Five-Year Consolidated Plan on May 1, 2000. The FY03 Annual Action Plan for Community Development



was approved by City Council on April 30, 2002. The Plan was then submitted to HUD on May 15, 2002 and subsequently approved. The FY04 Plan was approved by the Planning Commission on April 3, 2003.

Future Related Action(s): Attachment 1 is a schedule of community and public hearing presentations; these presentations include the Land Use & Housing Committee on April 23 and the City Council on May 20. A draft of the Action Plan will be submitted to HUD by May 15, 2003. After City Council approval, the final FY04 Action Plan will be submitted to HUD by May 27, 2003, for their review and approval.

BACKGROUND

As part of an effort to streamline programs and procedures, in 1994 the U.S. Department of Housing and Urban Development (HUD) began requiring entitlement jurisdictions to prepare a five-year strategic planning document entitled the Consolidated Plan, with annual applications and performance reports.

The City of San Diego's current 5-year Consolidated Plan covers Fiscal Years 2001-2005. The FY04 Action Plan serves as the combined application for four of HUD's FY04 formula-based programs: HOME Investment Partnerships (HOME: \$9,569,405), Community Development Block Grant (CDBG: \$18,647,000), and Emergency Shelter Grants (ESG: \$631,000). The City of San Diego will be the grantee for Housing Opportunities for Persons with AIDS funds (HOPWA: \$2,671,000), although the responsibility for HOPWA programs has been delegated to the County of San Diego. Proposed FY04 projects will be reported in the FY04 Action Plan.

The City's FY2001-FY2005 Consolidated Plan sets an affordable housing assistance goal of 7,500 new low-income households. This goal is in addition to serving nearly 31,500 households each year through a variety of Housing Commission programs (rental assistance, public housing, rehabilitation, homeownership, privately-owned rental units).

DISCUSSION

Overview

The City's FY04 Action Plan for Community Development serves a dual purpose. First, it serves as the City's comprehensive strategic plan for community development, including affordable housing, economic development and human service activities. Second, it is the single application and spending plan for four federal entitlement programs, totaling approximately \$30.8 million for FY04. Annual Action Plans are required to apply for funding.

This draft FY04 Action Plan has been developed as a collaborative effort between staff of the Housing Commission and the City's Community and Economic Development Department. In addition, opportunities for public input on the plan are available through a series of community presentations and hearings (see Attachment 1).

Consolidated Plan Contents

In response to comments from the general public, the region's policymakers, and HUD, a more user-friendly document was designed for presentation to the public. The Plan has been rewritten to more closely conform to the framework of the Code of Federal Regulations pertaining specifically to Consolidated Plan requirements. This has been accomplished by reformatting the Plan so that goals are more clearly delineated and overly technical language has been modified accordingly. The Consolidated Plan is formatted to present information on the conditions that influence the City's community development efforts. The Plan describes how the City is meeting the statutory requirements of specified federal grant programs. Those statutes require that the funds must primarily benefit low- and extremely-low income persons. The statutes set three basic goals:

- *Provide decent housing*
- *Provide a suitable living environment*
- *Expand economic opportunities*

The major sections of the Plan are:

Executive Summary: provides an overview of the Action Plan

Section 1, Community Profile: contains updated 2000 census data where available. Provides a summary of key characteristics affecting the City of San Diego community profile, such as population growth, Median Family Income, etc.

Section 2, Community Resources: identifies other local, federal and state resources available to meet the needs and activities identified in the City of San Diego's Consolidated Planning process (e.g., Housing Trust Fund, Multifamily Bonds, Density Bonus, Inclusionary Housing Program).

Section 3, Activities Planned for FY04: sets forth activities planned for FY04 in the areas of: 1) **Housing** - establishes priorities and outlines available resources and production capacity in order to determine the extent to which affordable housing needs can be met; 2) **Community Development** - describes a broad category of activities intended to complement efforts related to affordable housing and economic opportunity; and 3) **Economic Development** - describes the City's economic development strategy as it relates to the Action Plan, which includes an emphasis on shared economic growth and prosperity.

Section 4, Homeless Services: describes the City's strategy to meet the needs of its homeless populations and establishes the priorities and programs related to this coordinated effort.

Section 5, Regional HIV/AIDS Housing Plan: provides the framework for assessing and planning for the housing and housing related support services needs of persons living with HIV/AIDS and their families.

Section 6, Other Actions: outlines programs and fair housing services offered in an effort to overcome the barriers to fair housing. In addition, describes the City's Balanced Communities and Deconcentration policies, designed to ensure that housing assistance will generally be provided throughout the City and that, when possible, low-income residents do not end up concentrated in any one community.

Section 7, Citizen Participation Plan: describes the key components to afford the greatest possible input by the public during the planning and development stages of the Action Planning process. Greater outreach into the community was achieved through a variety of methods: 1) The Action Plan was mailed to a list of approximately 175 community members and nonprofit and for profit housing organizations; 2) Was posted on the Housing Commission's and the San Diego Housing Federation's websites; 3) Made available in the main library and all its branches; 4) Made available in all the community service centers; and 5) Public notices were placed in the local media and several articles were published announcing the development of the Plan and the public hearing schedule. Materials were also provided in other languages such as Spanish and Vietnamese. A summary of public comments and responses to those comments are included in Attachment 3 hereto.

Additional Affordable Housing Assistance Proposed for Fiscal Year 2004

According to data collected by the San Diego Association of Governments (SANDAG), the City of San Diego's affordable housing goal for the FY2001-2005 Consolidated Plan reporting period is approximately 7,500 new households to be assisted with affordable housing activities, through all affordable housing resources in the City.

It is estimated that during each of the five fiscal years (FY2001-FY2005) of the Consolidated Plan reporting period, approximately 1,500 additional households will be assisted with housing services, from all affordable housing resources in the City (Attachment 4). It is also anticipated that the City's multi-faceted strategies will provide housing assistance through the following activities:

- Rental assistance, including rental housing through a shared housing program.
- Newly created affordable rental housing; e.g. acquisition/rehabilitation and new construction, as well as preservation of existing rental units.

- Repair and rehabilitation to correct health and safety problems.
- First-time home buying financial assistance.

Last year, the Planning Commission recommended that the City explore ways to assist the rural homeless population living within the City and to make them aware of existing services. The City continues to provide funding for the Regional Task Force on the Homeless (RTFH). Although this group of homeless people are difficult to access directly due to a limited number of staff (2) in the Homeless Services Division of the Community and Economic Development Department, the City has developed an initial plan maximizing available community resources, nonprofit and governmental agencies, and funding sources to begin FY 03/04. This plan will help bridge the gap between the homeless and service providers, employers, and faith-based communities to address existing needs. This plan is described in Attachment 2, **Section 4-Homeless Services**.

Ongoing housing and related assistance will be continued during the year through special purpose housing for persons with HIV/AIDS; under-housed and homeless persons, families and youth; battered women; the mentally ill, and others who are disabled.

The extent to which housing assistance is provided to these groups will be influenced by local priorities and in part will be determined by the availability of funding through federal, state and local resources.

During this past year, the City Council approved the framework for an Inclusionary Housing Program that will ensure that homebuilders reserve ten percent of residential development or pay a fee in lieu of housing. The ordinance governing this new program is the subject of another report on today's agenda and will include provisions for an inclusionary housing fund.

Affordable Housing Needs and Priorities

Priorities have been established to determine how resources will be allocated among the many in need. San Diego has established priorities for assistance based on several factors: the number of extremely low- and low-income families (including single-person families) paying more than 30 percent of household income for housing costs, the cost of providing affordable rental and home ownership opportunities, and the guidelines for the funding source, for the given activity.

High and Medium Priorities have been identified by ranking a variety of household income and housing groups, and the activities which are targeted to those specific populations:

High Priority household and income groups include extremely low (0-30%), very low (31-50%), and low-income (50-80%) Median Area Income Households, who are: renters paying over 30 percent of income for housing or renters with physical housing defects. High priority also includes extremely low (0-30%) and very low-income (31-50%) renters with special needs or

homeowners needing housing rehabilitation. Homeownership assistance to households who are earning 31-80 percent of MAI is also a high priority.

Medium Priority household and income groups include low-income (51-80%) Median Area Income Households, who are: renters with special needs or homeowners needing housing rehabilitation.

Homeownership assistance to households who are earning 0-30 percent of MAI is also a medium priority.

To date, HUD has not finalized its final 2000 Census tabulations. It is anticipated that these tabulations will be completed in the fourth quarter of calendar year 2003 and made available to the public shortly thereafter. Once the data is released, the City's Affordable Housing Needs and Priorities will be re-evaluated and all the new data will be incorporated into the development of a new comprehensive five-year plan for the period FY05-FY09.

CONCLUSION

The FY04 Action Plan will be docketed for City Council deliberation May 20, 2003 and will be submitted to HUD after City Council approval.

The FY04 Action Plan will be deemed approved 45 days after HUD receives the Plan, unless HUD notifies the City additional information is required for the Plan to meet the criteria for approval. With that approval, the Plan will generate approximately \$30.8 million for FY04 to implement and continue community development efforts throughout the City.

Respectfully submitted,

Approved by,

Signature on File with Original Document

Carrol M. Vaughan
Chief Operating Officer

Elizabeth C. Morris
Chief Executive Officer

R.Albrecht (619) 578-7539

- Attachments:
1. Citizen Outreach and Consolidated Plan Presentation Schedule
 2. City of San Diego Draft FY04 Action Plan*
 3. Summary of Public Comments
 4. Low-Income Households Estimated to be Assisted with Housing in FY04

*Limited distribution. A copy is available for review at the Housing Commission office at 1625 Newton Avenue and the office of the City Clerk, 2nd floor, 202 C. Street. The Plan is also available on the Commission's website: www.sdhc.net.

ATTACHMENT 1

Citizen Outreach and Consolidated Plan Presentation Schedule

The draft FY04 Consolidated Plan was distributed to all of the City's libraries and Community Service Centers and mailed to individuals and organizations that had expressed a past interest. The availability and presentation schedule (shown below) was duly noticed in the local newspaper, for a Public Comment period, March 3, 2003 through April 3, 2003. Comments received from the public will be summarized in the Action Plan and as appropriate, incorporated into the final City Council approved document submitted to HUD by May 27, 2003 for its final review and approval. Public comment will also be solicited at the following community meetings and public hearings, and considered in the finalization of the City's FY04 Action Plan:

SCHEDULE OF PUBLIC HEARINGS RE: FY04 ACTION PLAN

Feb. 18 5:30 p.m.	San Ysidro Planning and Development Group Meeting 4350 Otay Mesa Road-San Ysidro School District Education Center
March 3 6:30 p.m.	City Heights Area Planning Committee Meeting 4310 Landis Street-Mid-City Community Police Facility
March 10 7:00 p.m.	Southeast San Diego Development Committee Meeting 841 S. 41st Street-Neighborhood House Association
March 24 7:00 p.m.	Linda Vista Community Planning Committee Meeting 2160 Ulric Street-Linda Vista Library
March 25 7:00 p.m.	Community Planners Committee Meeting 202 C Street, 12th Floor-City Council Committee Room
March 28 1:30 p.m.	Citizens Review Committee Meeting 202 C Street, 12th floor - City Council Committee Room
April 3 9:00 a.m.	Planning Commission Meeting 202 C Street, 12th floor - City Council Chambers (236-6596)
April 11 9:00 a.m.	Housing Commission Meeting 202 C Street, 12th floor, Committee Room (578-7539)
April 23 2:00 p.m.	City Council Land Use and Housing Committee Meeting 202 C Street, 12th floor, (533-4000)
May 6 10:00 a.m.	City Council Meeting - Proposed CDBG Social Service Projects 202 C Street, 12th floor, (533-4000)
May 13 10:00 a.m.	City Council Meeting - Proposed CDBG "Bricks & Mortar" Projects 202 C Street, 12th floor, (533-4000)
May 20 10:00 a.m.	City Council Meeting 202 C Street, 12th floor, (533-4000)

ATTACHMENT 3

SUMMARY OF PUBLIC COMMENTS RECEIVED*

**Only comments received as of April 2, 2003 have been included. All other comments will continue to be taken through the close of the public comment period on April 4, 2003. Those comments and their responses will be included in the next draft of the FY04 Action Plan and will be forwarded to the Housing Commission, Land Use and Housing Committee and the City Council for their review. All comments received will be included in the final FY04 Action Plan which will be submitted to HUD for their review—even if those comments are received after the public comment period is closed.*

The summary of public comments will appear in the adopted annual plan submitted to HUD in May of this year.

February 18, 2003 - San Ysidro Planning Committee:

- C1 Why is there both housing information and economic development information together in one report?
- A1 The City and the Housing Commission work together on the preparation of the Annual Action Plan of the Consolidated Plan. The City has the responsibility for administering the Community Development Block Grant Program (CDBG) as well as Homeless Services, including ESG.
- C2 I thought CDBG was a bricks and mortar program. Will any of the CDBG funds be spent on the affordable housing deficit?
- A2 There are a variety of sources of funds for affordable housing. The City has recently appointed an Affordable Housing Task Force to look for new sources of revenue. In addition, the newly adopted Inclusionary Housing Program provides for either funds or affordable housing to be part of many of the new housing developments throughout the City. The City Council could choose to spend a larger proportion of their CDBG funds for affordable housing activities.
- C3 There needs to be more sources of funds for the Local Housing Trust Fund.
- A3 The aforementioned Housing Task Force is looking into this matter.
- C4 Acquisition/Rehabilitation homeownership programs do not work well as an affordable housing program. The per unit subsidy is too great. The fixer up housing in the community is too expensive to make it work.
- A4 With the skyrocketing values of homes in San Diego, it is true that the amount of subsidy has had to increase to enable lower income homebuyers to qualify for home purchase and rehabilitation. The Purchase/Rehabilitation program is not

used on a wide scale, however it does meet a need by making the purchase and rehabilitation affordable to the homebuyer, and is an additional tool among the other housing rehabilitation programs to assist low-income residents.

March 3, 2003 – City Heights Area Planning Committee Meeting

- C1 I am surprised the City is still getting funds for HOPWA. I think there is now a greater need for assisting the mentally ill.
- A1 Thank you. Your comments will be forwarded to the decision makers for their review and consideration. It should be noted that the HOPWA program grant is a result of Congressional action. The County of San Diego administers the HOPWA program.
- C2 Where does the money come from for 108 loans?
- A2 The funds come from notes that are sold to investors by Chase Morgan on behalf of HUD.
- C3 What funds are being used in the NOFA (Notice of Funding Availability)? Is it going through the Housing Trust Fund?
- A3 The NOFA is for redevelopment funds that are being pledged to issue up to 55 million dollars for affordable housing projects located in the City of San Diego. The City's Community and Economic Development Department is administering the NOFA. Housing Trust Fund dollars are administered through the San Diego Housing Commission.
- C4 Can you explain how CDBG funds are allocated in the City?
- A4 It is federal entitlement money that is allocated to cities for community development needs. The City decides how it can be spent within established parameters. It is oriented to programs/projects benefiting low and moderate-income persons or neighborhoods identified through census tracts. The broad categories include capital improvements, economic development and public services.
- C5 I think the expenditures for CDBG should be limited to the lower income areas.
- A5 HUD regulations require that 70% of the CDBG funds be spent to benefit low and moderate income persons; in San Diego, we usually allocate 100% to such purposes.
- C6 I do not think there should be density bonus programs allowed in a neighborhood that doesn't have the infrastructure to support it. City Heights is overloaded with

affordable housing projects. These projects should be put in other communities in the City so that it is more in balance. The City's definition of "Balanced Communities" needs to be revisited. How is the First Time Homebuyer Program advertised (FTHB)? Lots of people need it but it seems only certain people learn about it. I also think universal design should be incorporated in all new/rehabilitated projects.

- A6 State law governs The Density Bonus program. Denying an applicant for density bonus who is in compliance with State law would be a violation of the law.

As the agency responsible for affordable housing in the City of San Diego, the Housing Commission supports affordable housing throughout the City. The Housing Commission supports affordable housing in areas that have higher levels of low-income residents *if* a developer is proposing to revitalize blighted properties or if a developer is proposing a new construction development. Given the housing crisis that the City of San Diego faces, the creation of affordable units will be supported anywhere in the City limits.

The Balanced Communities Policy was created in 1972. Appropriate staff at the Housing Commission and City will be asked to review and update, as necessary, the City's Balanced Communities Policy to ensure it reflects current issues.

Detailed information concerning our First Time Homebuyer (FTHB) program can be obtained via our website address at www.sdhc.net. The website provides detailed information on the various programs and how to apply. We have an information packet that can be mailed to interested buyers. We also maintain a telephone line set up just for the FTHB program so people can request information or ask questions. Our Community Relations department works with various newspapers and TV stations to make sure the programs are advertised in the community at large. Home loan counseling agencies promote our programs and we attend homebuyer fairs occasionally. We work with a number of lenders in the community who are all aware of our programs.

- C7 I don't know of any family of four making \$60,100 per year in City Heights. I don't know if anyone in the City makes that much. It is shown in the report as the median income and I don't agree with it. There are units near here where the rents are starting off at over \$1,000 a month. That is not affordable to me.

- A7 The figure you are referring to is last year's Median Family Income (MFI) for San Diego. In February 2003, HUD released updated MFI information. The MFI for San Diego County has decreased slightly from \$60,100 to **\$59,900**. HUD has adjusted the revised MFI income limits for areas with unusually high or low housing costs in relation to income. San Diego has been determined as an area with unusually high housing costs in relationship to income.

C8 I noticed there is a section in economic development and I was wondering what kind of monitoring is being done in these programs. For example, contractors in City Heights bring in outside subs to work on projects.

A8 The speaker is apparently referring to Section 3 requirements which related to hiring local contractors and vendors whenever possible. The contact person for CDBG is noted in the Action Plan. There is a section in the back of the Annual Plan that discusses monitoring procedures for CDBG and HOME projects.

C9 Defining federal poverty levels at \$22,000 for a family of 4 is unrealistic. No one can even rent an apartment in City Heights and spend \$22,000 just on housing costs. Small homes that were renting for \$450 a few years ago, are now renting for \$1,200 to \$1,500 a month. The City should ensure that the affordable housing component of inclusionary housing gets built where it should. We are concerned that in-lieu fees will be paid with no housing developed or that the affordable housing will be built in areas other than those designated.

A9 We acknowledge the difficulty of finding appropriate affordable housing in the City of San Diego. The Housing Commission continues to address this problem through its Rental Assistance Program, also known as Section 8, in which approximately 12,000 families and individuals live in decent apartments by paying a portion of their rent, from Federal funds, directly to landlords. This program allows people to live in apartments all over the city. In addition, the Housing Commission helps finance affordable housing by advertising when funds become available for affordable housing; developers – for-profit and nonprofit – respond with proposals for developments.

During this past year, the City Council approved the framework for an inclusionary housing program that will ensure that homebuilders reserve ten percent of residential development or pay a fee in lieu of housing. The ordinance governing this new program is currently being written and will include provisions for an inclusionary housing fund, which is expected to generate affordable housing monies in future years. The implementing documents for the inclusionary housing program will propose provisions that will ensure that revenue generated by the program is distributed equitably.

C10 Why are you using 1990 Census information in this report? If so are we also using the 1990 poverty level information?

A10 To date, HUD has not finalized its final 2000 Census tabulations. It is anticipated that these tabulations will be completed in the fourth quarter of calendar year 2003 and made available to the public shortly thereafter. Once the data is released, the City's Affordable Housing Needs and Priorities will be re-evaluated and all the new data will be incorporated into the development of a new comprehensive five-year plan for the period FY05-FY09.

- C11 The City should not be putting affordable housing where there are overcrowded schools and no jobs. The city should put the affordable housing where there are jobs and empty schools.
- A11 We will forward your comments to the appropriate Housing Commission and City staff for consideration.
- C12 The City should stop waiving Housing Trust Fund fees. This would help increase the trust funding levels. The city should create housing where it belongs. The San Diego Housing Commission is overpaying for housing in poor neighborhoods but then it will not pay as much for housing in rich neighborhoods. New affordable housing should be built north of Montgomery Field.
- A12 Variances from payment of Housing Trust Fund fees are allowed only under limited circumstances in accordance with Municipal Code Sections 98.0614-98.0617. Since 1990, the Housing Commission has approved the waiver of \$706,516.

In addition, the Housing Trust Fund does not apply to nonresidential uses located in the Metro Enterprise Zone (formerly the Southeast/Barrio Logan Enterprise Zone) and some developments in the Otay Mesa/San Ysidro Enterprise Zone as allowed under Municipal Code Section 98.0608, to encourage economic development.

During this past year, the City Council approved the framework for an Inclusionary Housing Program that will ensure that affordable housing is built wherever market rate housing is built. The majority of new housing is being constructed in the northern part of the City. In addition, much of this housing is within the NCFUA where inclusionary requirements already require that 20% of the housing being built be affordable to those at 65% of Median Family Income. The ordinance governing this new program is currently being written.

March 10, 2003 – Southeast San Diego Development Committee Meeting

- C1 What is the main reason for targeting households earning 50% of Median Family Income? Why not less than that to ensure that the very poor earning 15% of Median Family Income are served.
- A1 Limits are set by the Department of Housing and Urban Development based on statistical information. As noted previously, the MFI income for San Diego has decreased to \$59,900 this year. Accordingly, HUD has adjusted the income limits for San Diego County to reflect this fact and also to factor in the unusually high cost of housing in San Diego County. The Housing Commission utilizes HUD's Median Family Income figures for many of its programs. One such program is the Section 8 program, which continues to serve families in the extremely low and very-low income levels.

- C2 What is the relationship between Southeast Development Corporation and the San Diego Housing Commission? There should be better coordination.
- A2 SEDC is a redevelopment corporation that was established by the City to create housing and economic development revitalization activities in Southeast San Diego. From time to time the San Diego Housing Commission implements or finances projects and programs in Southeast San Diego and in that process coordinates with SEDC. Both agencies worked on a housing committee to produce the recently issued Notice of Funding Availability for affordable housing projects.
- C3 Adult children cannot afford housing. Housing design should be changed to accommodate adult children living at home. Homes should be designed creatively to change into dwelling units for other configurations of bedrooms with separate entrances as the children grow up.
- A3 Your comments will be forwarded to the policymakers for their review and consideration. We will also forward your comments on to the Building Industry Association.
- C4 What is being done to expand economic opportunities for low-income folks?
- A4 The Housing Commission is committed to promoting economic self-sufficiency through the Family Self Sufficiency Program (FSS), which links housing assistance to career planning, training and educational programs, and support services, in order to become independent from welfare payments. Each FSS participant signs a five-year contract with individualized and specific training, educational and job advancement goals. After signing the FSS contract, an escrow account is maintained for each participant with increases in earned income.

In addition, the Commission works in collaboration with the San Diego Community College District, San Diego Workforce Partnership, Occupational Training Services, Boys & Girls Club, Neighborhood House, University of California San Diego (UCSD), Union of Pan Asian Communities (UPAC), San Diego Police Department, trade unions, Chicano Federation and YMCA. Through these collaborations, clients are provided outreach, orientation, vocational assessment, career planning, case management, access to support services, support funds, and job development. Also provided is employment training in family day care, nontraditional occupation training, and apprenticeships.

The City uses some of its CDBG funds for economic development, mainly in the form of small business assistance. The City also utilizes other grants and local funds to provide incentives for businesses to expand in or set up business in the lower income neighborhoods. In addition, redevelopment is used as a tool to encourage development of job producing projects.

- C5 How are CDBG activities monitored? Is there a formal system or monthly reporting for example?

- A6 Many of the CDBG programs are administered via contracts with community-based agencies. These agencies are required to report monthly on services provided and expenditures made. However, there are only two monitors so it is difficult for them to conduct on site monitoring visits. The City does its best to evaluate the delivery of services and to inform the Council offices when there are problems.

March 24, 2003 – Linda Vista Community Planning Committee Meeting

- C1 Will the City receive CDBG funds past June 30, 2003?

A1 Yes, the City will be allocated funds as shown in the Annual Plan document.

- C2 When the Housing Commission provides a homebuyer with a loan; does the Commission eventually receive any of these funds back?

A2 The Housing Commission provides second trust deed loans and down payment assistance grants. Loans require the repayment of principal. In addition, the Housing Commission receives a portion (using a sliding scale) of the net increase in property appreciation based on the number of years the homebuyer lives in the home.

- C3 Are there classes available to teach renters about how to purchase a home?

A3 The San Diego Housing Commission contracts with the San Diego Homebuyer Counseling Service, which is one of the agencies that provide this service in the City. The agency assist prospective first time homebuyers review their credit history; what they need to do to purchase a home.

- C4 How does the public know how to qualify for the various programs available in the community?

A4 Some of the programs are promoted in the various media outlets including newspaper and television. Housing Commission staff regularly attends homebuyer fairs. In addition, all the Housing Commission programs are on the web site: www.sdhc.net. A lot of the lenders in the community also know about the Housing Commission programs. We will also review our outreach programs to see if we can improve the ways we reach prospective homebuyers in the City of San Diego.

Several years ago, the Housing Commission unveiled a shared equity loan program specifically for the Linda Vista area. Extensive marketing of the program was conducted for a few years. \$181,500 was available for loans and eight loans totaling \$160,000 were funded; \$21,500 remains in the Linda Vista program.

- C5 The San Diego Housing Commission should find more ways to advertise their homebuyer programs. Perhaps they should put flyers in libraries or other neighborhood places.
- A5 Thank you for your comments. We will also make sure to distribute housing information to the Chairs of all the Planning Committees.
- C6 I think the City should consider having a special place on their website where the public can type in questions on where to find specific information. There has to be a centralized location for information.
- A6 Thank you for your comments. We will pass them on to the appropriate city departments. In addition, we could provide a speaker for one of your future planning group meetings who could come and speak on specific programs that are of interest to you.
- C7 The real estate offices should have special bulletin boards with information on special programs.
- A7 Thank you for your comments. We will forward them to the appropriate city departments.
- C8 Can we still provide comments after this meeting? I would like to review the report again.
- A8 Yes, you have until the end of day on April 3, 2003 to make additional public comment.

March 25,2003 – Community Planners Committee Meeting

- C1 The section 108 program from the government is supposed to be paid back from a revenue generating projects. Unfortunately, the City of San Diego has chosen to select projects such as the mid city library and police station, which are not revenue producing. Therefore the CDBG has to pay the funds back to the 108 loan. It is however a way to leverage funds and without the funds the projects may not have been built. It is a policy decision the City has made.
- A1 Thank you for your comments.
- C2 The census data in this report is from 1990. Doesn't the City have the 2000 census data?
- A2 Some 2000 census data is available. The data necessary for the housing needs assessment for low and moderate income households will not be available to the

end of the calendar year. Where 2000 census information is available, it is incorporated into the document.

The City is also using the 2000 census data to adjust its CDBG process to take that into account.

C3 The Housing Trust Fund (HTF) is the single most effective program we have in this City and perhaps in this State. HTF's are so flexible and so effective that they can actually fund innovative projects. HTF should be increased and I would like the committee to entertain a motion to request the Housing Commission to study this further.

A3 Thank you for your comments.

C4 HUD is going to apply for some 108 funds over at the Naval Training Center. I think the developer McMillan was requesting it. I think it was for some work that the developer was to complete. I would rather see the funds go to a private or non-profit organization to implement any programs.

A4 A loan for the Naval Training Center Foundation not the developer is being discussed. There has been no decision made. The City Council will review the issue at its May 6th meeting. There will not be an application unless the Council authorizes it. The money would be used for the renovation of the buildings where the public arts and cultural center is what is designated the historic core. It would be a grant from the City to the Foundation.

C5 I don't think the track record of the NTC Foundation is very good.

A5 Thank you for your comment.

C6 There is a section of road between 163 and Highway 15 on Balboa Avenue that was turned over to the City from Caltrans. I have requested that the City consider putting sidewalks there. Does this type of project fall under this plan? Did the money the City received get dedicated for these purposes?

A6 We will forward your comments to the appropriate department. This does not fall under the Consolidated Plan.

C7 I move we adopt a resolution that states that the Community Planners Committee urges the Housing Authority to broaden the sources of funding for the Housing Trust Fund; that it increase the revenue to the Housing Trust Fund by a factor of five; and that it forbid the Housing Commission from waiving the receipt of any fee from any of the sources present or future. We have a housing crisis that speaks for itself. We need a much larger trust fund. We need to restore the trust fund to its prior level which was five times larger.

- A7 We can return next month to specifically discuss the Housing Trust Fund. (the resolution for this specific motion was then withdrawn)

March 28, 2003 – Citizens Review Committee Meeting

- C1 Is disabled services getting \$1.4 million this year?
- A1 This is the amount that has been the amount allocated the past few years. The City Council is the final authority on how the funds are allocated.
- C2 Is the 20% setaside from the City funds to remove architectural barriers used?
- A2 Yes, it is eventually expended. At times, it appears to be available because it is part of a multi year capital expenditure project.
- C3 The disability community endorsed and advocated for the 20% set aside. I think more is needed for this purpose. At one time, the amount of funds was only \$5,000. Our group lobbied to increase it to the amount it is today. Individual members of this committee can still go to their City Council members to request that some of their funds also go for this purpose.
- A3 Thank you for your comment.
- C4 I know there is a domestic violence program for people with disabilities. Is that program still active? It's a program that ensures that all shelter programs have the means to allow access for all women and children with disabilities to the shelters. Accessibility includes items such as sign language. Oftentimes women with wheelchairs; who need sign interpreters; who need a personal care assistant are turned away. It is known nationwide.
- A4 We will have to research this question and have a staff member get back to you on this issue.
- C5 Will our Committee is ever going to get clerical work funded from CDBG? The City should match clerical assistance. This issue has been going on for eight years.
- A5 The CDBG funds provide overall disability grants. I will refer your comment to the appropriate staff member.
- C6 We received four pages of information. We did not receive the whole plan.
- A6 The Annual Action Plan is available in a variety of places. We contacted the City staff that ensured us that it was best to provide a summary to the Committee. We would be happy to provide each member with a full copy of the Plan.

- C7 We should have received a full plan earlier. Affordable accessible housing for the disabled community is one the most critical needs that our community has. We have people in their wheelchairs sleeping under bridges because we don't have accessible shelters. We have people who can't secure housing because of the lack of affordable housing. There are a whole list of concerns that we need input into this report. Is it on the Housing Commission web page?
- A7 Yes it is on the Housing Commission web page. It is at the City Clerk's office. It is in all the libraries, and the Community Services Centers.
- C8 How does the section 8 program interface with this document?
- A8 The Annual Plan is required to list additional resources. The Section 8 program serves approximately 12,000 households of which approximately one-third are disabled households.
- C9 I understand there are ways of receiving additional Section 8 funding when funding is used specifically to move people from institutional settings into the community and I am wondering if the recommendation to setaside funds for this purpose be an appropriate part of this plan?
- A9 Any comments you make will be included in the document itself. The San Diego Housing Commission is working and continually works towards getting more vouchers. We anticipate in Fiscal Year 04 in getting approximately 500 new vouchers. Of those 500 vouchers, 75% of those have to be dedicated to those households earning 30% or less of area median income. A portion of those are vouchers go towards people with disabilities.
- C10 Does the Consolidated Plan make specific reference to compliance with the ADA and section 504 of the Rehabilitation Act?
- A10. Yes it does.
- C11 Do we have a statement that any project receiving public funds will be accessible or adaptable as required?
- A11 Any facility or housing project receiving public funds goes through a compliance process, and ADA is one of the factors. All housing projects go through the community planning process prior to getting approval.
- C12 Are projects also compliant with the Fair Housing Act?
- A12 Yes, The San Diego Housing Commission contracts with the Fair Housing Council to ensure that the Fair Housing Act is carried out in the City of San Diego.

- C13 Are tax credits that are granted considered federal funding? I think the City should recommend that tax credits be treated as a form of federal funding and therefore also trigger accessibility requirements.
- A13 Tax credits are not federal funding. We will forward your recommendation to the policymakers for their review and consideration.
- C14 Some of us in the community have already sent to the City a comprehensive list of comments. We need more mention of universal design.
- A14 Thank you for your comments.
- C15 This document is the fourth year of the fifth year of the consolidated plan. This is an important year to make comments because planning for the new consolidated plan will start soon. I think the non profits who provide shelter and do not comply with ADA requirements should be shut down. It is a fair thing to do. There should be enforcement. I think we should have gotten more than the four pages. I couldn't find it on the web page. People who need housing are really impacted by this document. The next five year plan is going to be very important. Everything on this two-page list applies to people with disabilities. We have needs the same as everyone else. I didn't see San Diego's name on the Home Base list for section 8 for people who are deinstitutionalized. It would help people in the community if the City would apply. You can also apply for increased percentage of rent. The old housing is not accessible and the new housing is not affordable. By applying for this extra percentage, you can actually have some impact on creating accessible units. I think that have people who have accessible units have to give them to people who need them. It is ridiculous the way it is working in the City. We can't impact this plan as much as we could because of the lateness of the notice. Perhaps we can be more ready next time.
- A15 The Plan is posted on the Housing Commission's website at www.sdhc.net. We will make sure that all member so the Committee receive an electronic copy of the Plan as well as a hard copy of the next draft when it becomes available.
- C16 In my community there is very little outreach to the disabled community. I would suggest that there be more outreach to the disabled community. There is a discrepancy in the document. In one part it says inclusionary zoning is only required for six months. I am also concerned about HOPWA. How did that come about? Is it still needed? Perhaps it should be expanded to other disabilities and not just people with AIDS. I got a copy since I am a member of the Planning Committee and I want to read a particular sentence of the Plan. It has to do with Section 202 program. It describes that most of the units funded go to elderly and the rest to disabled. I find that offensive and want you to strike that sentence. If buildings are financed rehabilitated with San Diego Housing Commission funds the buildings must be universally designed. There is an apartment complex near us and it had some accessible but not universally designed.

A16 Thank you for your comments.

C17 Part of the program the San Diego Housing Commission gives funds for 15 year projects and don't require universal design. Also the Commission is giving Section 8 housing to non-universally designed. There should be a motion that all projects with public funding should require universally designed in the City of San Diego.

A17 Thank you for your comments.

C18 If you are going to ask for a comment then I would really like to have the background material because I am not on a planning committee but I will sit down and read an 150 page document if it is important to the disabled community. I don't have time to go chasing after this document.

A18 We appreciate your concerns. We have provided an electronic copy of the Action Plan to all members of the Committee and will forward a hard copy of the next draft as soon as it is available.

C19 I am anxious to see the Access Center recommendations. I am concerned that if we wait until our next meeting that it will be too late to impact the process. I am asking that we authorize a sub committee to meet and make some statements on behalf of the committee. Perhaps the committee should have a special meeting on this topic.

A19 The City has received a letter from the Access Center. That letter and all the concerns you expressed this evening will be placed in the Annual Plan. The issues that you raise cover a broad range of departments in the City and the Housing Commission. We have addressed all comments made by the Access Center. Those comments have been forwarded to each of the Committee members.

C20 We would like to create a housing sub committee. I agreed to be a liaison with the AHA group. (a copy of information was passed out). The Chair wanted to make sure all their concerns were presented. A committee member wanted the housing sub committee to also include other aspects of the Plan including human services.

A20 We will be happy to pass any comments you have onto City officials.

April 3, 2003 – Planning Commission Meeting

C1

A1

C2

A2

C3 .

A3

C4

A4

C5

A5

C6

A6

April 11, 2003 – Housing Commission Meeting

Comments from the Public:

C1

A1

Commissioner Comments:

C1

A2

C2

A2

April 23, 2003 – City Council Land Use and Housing Committee Meeting

Public Comments:

C1(a)

C1(b)

A1

C2

A2

Comments from the Committee Members:

Additional Comments Received at the Housing Commission via electronic and postal mail

Comments were received from The Access Center and are summarized below:

The following comments from The Access Center cover a wide range of programs and services, both at the Housing Commission and in the City of San Diego. The City of San Diego and the Housing Commission have worked together to ensure that the issues raised by The Access Center are addressed in as comprehensive a manner as possible.

C1 People with disabilities from low-low to high income need and deserve a variety of housing options in various neighborhoods, complexes and buildings. Local planning and funding initiatives need to provide matches to state, federal and private funding programs and incentives.

A1 The Housing Commission offers the following programs, which are available to persons living with disabilities:

Public Housing Program

Approximately 1,800 residential units are publicly owned and managed by the San Diego Housing Commission within the City of San Diego. Of those units, 398 have been modified for accessibility for wheel chair tenants, another 64 units have been modified for mobility impaired, and 124 have been modified for visual/hearing impaired tenants. The Service Coordinator Program serves the elderly and disabled residents of four public housing sites: Belden Village, Meade Avenue, First Avenue and Maryland. Its purpose is to make available support services that will foster independent living, healthy choices and improved quality of life. Services include outreach, information and referral, transportation, meal services, congregate wellness activities, education, training and employment services. Additionally, the majority of our Learning Opportunity Centers are accessible to persons living with disabilities.

Section 8 Rental Assistance Program

Over 11,000 very low income households are assisted through rent subsidies in privately owned rental housing within the City of San Diego. Of these, 8,375 are disabled heads of household, and another 2,254 are elderly, which include elderly living with disabilities. The Housing Assistance Payments Contract (HAP) between the Housing Commission and the property owner contains specific provisions prohibiting discrimination based on disability and other factors, such as race, ethnicity, religion, sex, etc. The HAP contract also addresses compliance with Federal government statutes, which require compliance with applicable fair housing laws. The contract also provides for a reassignment of the contract under certain circumstances in which such reassignment would provide for a reasonable accommodation for participant who is a person with disabilities.

Housing Rehabilitation Program

The Housing Commission's Housing Rehabilitation Programs provide assistance to homeowners through No Interest Deferred Loans up to \$10,000 and 3% interest 15 year amortized loans up to \$35,000. Owners with disabilities, or with household members with disabilities can use these programs to make accessibility improvements and repair health and safety hazards. Rehabilitation staff assist owners in determining the best and most cost effective ways to eradicate hazards and make accessibility improvements, such as ramps, door widening, replacing tubs with walk/roll-in showers, installing grab bars and other improvements.

In addition, tenants with disabilities renting privately owned rental units within the City of San Diego can apply for a non-repayable grant of up to \$1,000 to make accessibility improvements in their unit with permission from the owner.

- C2 Current "assurances" of accessibility in services, programs, buildings and sites are absolutely no guarantee of true compliance. The City has an obligation to take an aggressive stance on compliance with regulations, funding (and de-funding) or programs contingent upon compliance. There needs to be scheduled spot checks on actual access. This could be achieved through a "secret shopper" program or similar formalized activity, with reports filed and follow-up provided. This includes physical access to parking, entry, residence units, programs and service that are publicly funded, and program access allows people with hearing, vision, speech and other disabilities to participate in programs; and ongoing scheduled and monitored training of staff in use of services, equipment and obtaining these off-site, if required.
- C2 The Housing Commission is in compliance with all Fair Housing laws and regulations governing accessibility for persons with disabilities. The Housing Commission is not aware of any non-compliance issues; however the Housing Commission and the City of San Diego will investigate any reported cases of noncompliance. The Housing Commission received a clean audit pertaining to HUD 504 Compliance this year, which covered the areas of General ADA requirements, Communications, Program Accessibility and Equal Employment Opportunity in all areas of employment including recruitment, testing and selection, physical limitations and accommodations, workplace issues and grievance process and physical accessibility.

The Housing Commission has reviewed its physical facilities, resulting in facility upgrades, including changes in our parking structure to facilitate accessibility to persons with mobility impairment and other disabilities.

The Housing Commission currently contracts with the Fair Housing Council of San Diego (FHCS) to provide comprehensive fair housing services. The programs and services offered by the Fair Housing Council serve to address some of the issues you've outlined. These programs will further assist the City's efforts to meet its obligation to affirmatively further fair housing, which covers those persons living with disabilities.

In addition, the Housing Commission will be conducting a review of the Housing Assistance Needs of Low & Moderate Income households as soon as the 2000 Census figures are available for this purpose. To date, HUD has not finalized its final 2000 Census tabulations. It is anticipated that these tabulations will be completed in the fourth quarter of calendar year 2003 and made available to the public shortly thereafter. Once the data is released, the City's Affordable Housing Needs and Priorities will be re-evaluated and all the new data will be incorporated into the development of a new comprehensive five-year plan for the period FY05-FY09.

Suitable Living Environment

City of San Diego Administrative Regulation 96.20 entitled City Policy for People with Disabilities: Physical Access has been in effect since January 1, 1998. It was established to "...comply with Section 504, Title V, of the Rehabilitation Act as amended, Sections 11135-11139.5 of the California Government Code, the Americans with Disabilities Act (ADA) and any other application local, state and federal laws and regulations protecting the rights of people with disabilities." It provides various definitions, designates the Disability Services Coordinator as the lead for this program, delineates the responsibility of Department Directors to operate programs activities and services to they are readily accessible and useable by individuals with disabilities, designates the City Clerk as the coordinator of the provision of certified sign language/oral interpreters when needed at City Council and Committee meetings and outlines the process for requesting such an accommodation.

We are in the process of identifying a system to improve the coordination, tracking and funding mechanisms currently in place. We install approximately an average of 195 curb ramps per year. In addition, when water, sewer and/or street work is performed and curb ramps are needed and/or need to be reinstalled, the work is completed as part of the project.

Regarding the need for sensitivity training, we concur. To date the Disability Services Coordinator has conducted 100 hours of training. We do see the need for additional training and have incorporated it into our draft Strategic Plan for FY04. This program was also offered to Housing Commission staff.

An Access Law Committee was established by the Assistant City Manager September 2002 to address pressing issues such as coordinated statistical reporting, mandatory training, potential funding sources, review status of the City's Transition Plan and other compliance related issues. The group has been meeting monthly since then and is making progress toward establishing a baseline of our physical retrofit activities, which would be updated on a monthly basis. The Committee also requested the President of the Citizens' Review Committee on

Disability Issues (CRC) attend their February meeting to foster a more cooperative and collaborative partnership between City staff and the Manager's Committees.

- C3 Current programs and services for emergency lodging and assistance (Homelessness, Domestic/Family, Victims Services, etc.) are generally inaccessible, regardless of the fact that the City and other public entities are channeling funds to these groups. There must be immediate and aggressive scheduled and ongoing checks into these program (sic), both to assess and mandate access features, and to redistribute public funds to appropriate programs and services that can serve the public, if necessary.

A3 **Shelters and Transitional Programs**

The City's Winter Shelter Program consists of three primary components: 1) a 200 bed shelter serving homeless single adults, 2) a 150 bed shelter serving homeless veterans and 3) a 100 bed overflow shelter serving families with children. The Program begins December 15th of each year and ends March 15th. Contracts are developed with nonprofit agencies to provide specific services. Included in each contract is language requiring compliance with the Americans with Disabilities Act and the City's Non-Discrimination Ordinance (which prohibits discrimination based on race, gender, religion, national origin, ethnicity, sexual orientation, age or disability).

Both the single adult and veterans' shelters are operating in single level "sprung structures" and provide accessible showers and bathrooms.

The City also sponsors a 150 bed short term transitional housing program for families operated by the YWCA. The program operates in a two story city-owned building, which formerly was a motel. There are a total of 44 living units with 2 accessible and 4 designated parking spaces with 1 being accessible. Phase II of the project, which includes a two story new building will include a kitchen, dining room, meeting rooms and playroom will also require the installation/rehab of an elevator to ensure accessibility. Disability Services staff will be actively involved in the design, construction and permitting process for this project.

Finally, the City provides partial funding to several emergency shelter and transitional housing programs through its HUD funding. The above mentioned contract language is incorporated in these programs. Staff conducts desk and on-site compliance reviews to ensure agencies are in compliance with governing regulations. We will add to the site visits, a review of their facilities as it relates to ADA compliance.

- C4 Employment initiatives that receive public funds must make their programs and services accessible through physical and program features. People with disabilities are the least employed in the nation (as much as 80% unemployment rate, according to the Lou Harris poll), and similar to housing and service programs,

these providers and agencies must either become accessible or stop receiving public dollars. The vast majority of people with disabilities can work and want to work, but lack of opportunity prevents increasing income and leveraging housing options. The City has an obligation to take a lead stance in assuring with integrity and formalized process that employment agencies, training programs, placement agencies, etc., use their own public funds to budget (plan for) and provide accessibility features and reasonable accommodation. The Department of Rehabilitation is being bankrupted by other organizations and agencies (both public and private) that refuse to utilize public funds to provide the mandated accessibility. This must stop.

.A4 To expand economic opportunities

City of San Diego Administrative Regulation (AR) 96.21 entitled City Policy for People with Disabilities: Employment has been in effect since January 1, 1998. It was established to "...comply with Section 504, Title V, of the Rehabilitation Act as amended, Sections 11135-11139.5 of the California Government Code, the Americans with Disabilities Act (ADA) and any other application local, state and federal laws and regulations protecting the rights of people with disabilities." It designates the responsibility of this aspect of the City's program to the Personnel Director, establishes an ADA Employment Advisory Committee, delineates the responsibility of Department Directors, and addresses employee accommodations.

Our draft Disability Services Strategic Plan identifies the need for the City's Disability Services Program to more actively partner with the ADA Employment Advisory Committee. Meetings are currently being scheduled to discuss how we can assist each other, coordinate our respective activities and plan for the future.

The Housing Commission has conducted a review of all aspects of its personnel practices related to Equal Opportunity and employment of persons with disabilities. Following is a summary of systems in place which address these issues:

- As part of the HC's New Employee Orientation Program, the Human Resources Department communicates to all newly hired employees on the subject of leave rights and disability protections under the law including informational resources and contacts available to employees.
- New Supervisors additionally receive a separate New Employee Orientation Supervisor's Handbook that includes Fact Sheets on fitness for duty, medical standards, reasonable job accommodations, and leave of absence rights.
- As part of the coaching and development process, supervisors are trained and have received a Directions in Discipline Manual that considers physical disabilities and accommodations when part of the discipline process.

- Targeted for distribution to all employees is a new Administrative Regulation on Reasonable Accommodations and tools and resources for managers and supervisors to assess and implement requests for reasonable accommodations.
- A new community Disability Access Resource List has been distributed to all supervisors to assist them in locating reasonable accommodation resources.
- The HC's Personnel Policies promote Equal Opportunity of applicants and employees and that reasonable accommodations will be made whenever possible.
- We advertise for employment in several locations and in several documents stating that the HC is an Equal Opportunity Employer providing reasonable accommodations to applicants in testing and selection processes including TDY.
- The HC provides for self identification of disabilities and accommodations needed by applicants. Upon identification, special testing arrangements are made.
- Employment processes provide guidance to Interview Panels and Hiring Departments regarding individuals with disabilities and their rights, protections and accommodations.
- All selections are monitored by the Equal Opportunity Manager with respect to fair and objective processes including the hiring of persons with disabilities.
- Upon hire all employees voluntarily self identify regarding disability and accommodations needed on the job.
- The Job Offer process provides opportunity for a prospective employee to relay accommodations needed to perform the essential duties.
- For internal promotional hiring, the same process applies. Individuals with recorded disabilities are identified to ensure reasonable accommodation for promotional consideration are provided.
- Workplace accommodations are regularly made, documented, and discussions held with supervisors to ensure understanding.

The following comments were received from the **Corporation for Supportive Housing**:

Thank you for the opportunity to submit comments in response to the *FY 2004 Action Plan for Community Development* prepared by the San Diego Housing Commission and Community and Economic Development Department, City of San Diego.

Summary of Recommendations for *FY 2004 Action Plan for Community Development*:

The Corporation for Supportive Housing (CSH) wishes to acknowledge the important leadership roles played by the Housing Commission and the Community and Economic Development Department in

supporting affordable housing and addressing the needs of homeless individuals and families in San Diego. CSH is concerned that, as currently drafted, the *FY 2004 Action Plan for Community Development* does not provide an adequate emphasis on the housing needs of Extremely Low-Income (ELI) households (with incomes from 0 – 30% of Area Median Income [AMI]), or on the permanent housing needs of individuals and families experiencing homelessness. In light of these concerns, we are making the following recommendations for the *FY 2004 Action Plan*, which are discussed in more detail in this letter:

1. The inclusion of clear goals for the development of units affordable to ELI households. (See page 3)
2. The dedication of a representative portion of housing development resources for use only for the development of units affordable to ELI households. (See page 3)
3. The dedication of resources to the development of a 10-Year Plan to End Homelessness with a clear focus on permanent housing opportunities. (See page 4)
4. The creation of a preference for, and prioritization of, supportive housing projects in the provision of affordable housing resources. (See page 4)
5. The reinitiation of joint City Council / County Board of Supervisors planning efforts to address homelessness. (See page 4)
6. The establishment of clear goals for the next phase of the implementation of the City's Special Needs Homeless Initiative. (See page 4)

FY 2004 Action Plan's Goals and Priorities:

CSH strongly supports the *Action Plan's* stated goals, including the first goal “to provide decent housing,” emphasizing: retaining affordable housing stock; increasing the availability of permanent housing affordable housing to low-income households without discrimination; assisting homeless persons to obtain affordable housing; and increasing supportive housing that includes structural features and services enabling persons with special needs to live independently. (*Executive Summary, page i.*)

CSH also wishes to express its strong support for the *Action Plan's* definition of High Priority Household and Income Groups to include Extremely Low- (0-30%) and Very Low- (31-50%) Median Family Income Households, including renters paying more than 30% of income for housing and renters with special needs. CSH also supports the *Action Plan's* stated “preference for long-term housing solutions rather than emergency or temporary measures” in establishing the city's priorities for assistance. (*Section 3 – Activities Planned for FY 04, page 3-1.*)

CSH is concerned however, that the *Action Plan* does not identify sufficient strategies to forcefully address the permanent housing needs of these priority households and income groups. We are especially concerned about the lack of clearly articulated, targeted strategies for meeting the housing affordability needs of Extremely Low-Income households, for assisting homeless people to obtain affordable housing, and for increasing permanent supportive housing.

Housing Needs of Extremely Low-Income Households:

The Congressionally-appointed Bipartisan Millennial Housing Commission recognized that, nationally, Extremely Low-Income (ELI) households (0-30% of AMI) face the most severe housing needs: “... the multiple problems of housing inadequacy bear most heavily on extremely low-income

households, most of whom report paying well over half their incomes for housing costs. The most dramatic problem is the severe shortage of available units.” The 1990 census data included within the *Action Plan* confirms that ELI households face the most severe affordability issues in San Diego. (*Figure 2.11. Housing Assistance Needs of Low and Moderate Income Households*) This data documents that more than 70% (26,353 households) of all ELI renter households (36,999 households) face severe housing cost burdens (housing costs greater than 50% of income). Further, ELI renter households equal only 29% of all renter households with incomes between 0-95% of AMI, but represent 59% of those households with severe housing cost burdens.

Despite this strong evidence of the disproportionate affordable housing needs of Extremely Low-Income households, the *Action Plan* does not clearly articulate any targeted strategies or goals for the development of housing that will be required to be affordable for ELI households. For example, *Section 2 – Community Resources* identifies several resources and strategies used to support and/or encourage the development of affordable housing units. These strategies include the use of diverse funding resources (including HOME funds, HOPWA resources, the Housing Trust Fund, Multifamily Tax Exempt Bonds), the Density Bonus strategy, and the proposed Inclusionary Housing Program. While all of these programs have proven effective in the development of housing affordable to Low- and Very Low-Income households, no information is provided that documents past accomplishments or assures future development of housing affordable to Extremely Low-Income households, the households shown to have the highest level of need.

In response to these concerns and the housing needs of ELI households, CSH recommends the following be included in the *FY 2004 Action Plan*:

- A clearly stated goal for the development of units affordable to ELI households with incomes at or below 30% AMI, and a commitment to track and report the City’s success in supporting the development of additional units affordable to households in this income group.
- The dedication of a portion of housing development resources for use only for the development of units affordable to extremely low-income (ELI) households, and a commitment to develop effective strategies to ensure that such development takes place. Such strategies might include adjusted loan limits and/or subsidy levels, expanded efforts to link rental subsidy resources (such as Project Based Section 8 funding) with housing development financing, dedicating a larger percentage of redevelopment resources to affordable housing development, leveraging additional state and federal resources, and other strategies that may be needed to support such deeper affordability goals.

Permanent Housing Needs of Individuals and Families Experiencing Homeless:

The *FY 2004 Action Plan’s Section 4 – Homeless Services* clearly documents the strong commitment of the City of San Diego to addressing the needs of homeless individuals and families, and CSH wishes to acknowledge the tremendous impact of that commitment. CSH is concerned, however, that the *FY 2004 Action Plan* does not provide an adequate focus on the permanent housing needs of San Diegans experiencing homelessness, despite the Plan’s stated “preference for long-term housing solutions rather than emergency or temporary measures.” While indicating that the “City emphasizes the ‘Continuum of Care’ strategy set forth by the U.S. Department of Housing and Urban

Development (HUD), the *Action Plan* does not reflect the Continuum of Care programs' continued strategic emphasis and prioritization of the development of permanent supportive housing opportunities for individuals and families experiencing homelessness. This emphasis has been identified as a key strategy for addressing homelessness in a wide variety of local, State and Federal planning efforts, including:

- The City of San Diego's Homeless Policy (1995) recognizes the need for a progression of housing options, including permanent housing for people leaving homelessness. Further, in 1999, the City Council authorized a Special Needs Homeless Initiative that included initial goals for the development of additional permanent supportive housing units.

- The Millennial Housing Commission established the goal of ending chronic homelessness as one of its Principal Recommendations and identified the need to create 150,000 units of permanent supportive housing over the next 10 years as one of the key strategies for achieving that goal.
- The goal of 150,000 units of permanent supportive housing has also been adopted by the Federal Interagency Council on Homelessness, including HUD, Health and Human Services, Veterans' Affairs and many other Federal agencies.
- The U.S. Conference of Mayor's national survey of 25 cities (December 2002) identified the lack of affordable housing as the top cause of homelessness, and the cities identified the need to develop permanent supportive housing as a key national strategy for addressing homelessness.
- The Governor's Interagency Task Force on Homelessness (July 2002) called for the creation of 11,250 new units of permanent supportive housing by 2010, while recognizing that the actual need is many times higher and required further study.
- The San Diego County Mental Health Board Strategic Housing Plan (October 2001) establishes a goal for increasing the supply of permanent supportive housing by 2,000 units in San Diego.
- The County's HIV/AIDS Strategic Housing Plan prioritizes the need for more affordable permanent housing units linked to case management services for preventing and ending homelessness for HIV/AIDS services consumers.

Despite this wide recognition of the importance of permanent supportive housing for addressing, and ending, chronic or long-term homelessness, the *Action Plan's Homeless Services* section includes only a brief discussion of permanent supportive housing under "Additional Programs Available to the Homeless Population for FY04." CSH does not believe that supportive housing should be created at the expense of other necessary services and interventions for homeless people and, further, recognizes that supportive housing is most successful as part of a continuum of programs that provides a variety of services and housing opportunities for people experiencing homelessness. CSH recommends, however, that the *FY 2004 Action Plan* include clearly articulated and prioritized strategies to foster the development of supportive housing within the City's plans for addressing homelessness in San Diego, including:

- The dedication of resources to the development of a 10-Year Plan to End Homelessness (as has already been completed in other cities in the United States and as is now required of Continuum of Care planning groups) with a clear focus on permanent housing opportunities as a key strategy in that Plan.
- The dedication of resources to proactively identify and seek development of available properties or sites for which the City will approve permanent supportive housing programs for special needs homeless populations.
- The reinitiation of joint City Council / County Board of Supervisors planning efforts to address homelessness and to strategically match the provision of services funding and housing funding to address the needs of chronically homeless San Diegans.

- An assessment of the progress and accomplishments of the City's Special Needs Homeless Initiative and the establishment of clear goals for the next phase of the implementation of that initiative.

Thank you for your consideration of these recommendations. Please feel free to contact us with any questions or if you wish to discuss any of these recommendations in greater detail.

Sincerely,

Matthew Doherty
Program Officer for San Diego
(619) 232 – 3194
matthew.doherty@csh.org

Jonathan Hunter
Associate Director for Southern California
(619) 232 – 3197
jonathan.hunter@csh.org

Response to Comments:

The City of San Diego recently established, organized and facilitated a Homeless Task Force consisting of non profit providers, City and City Agency staff. This task force met over several months and developed a final report for the City Council consideration. The report was presented and accepted by the Land Use and Housing Committee and is in the process of being docketed for the full City Council. In the report the Task Force made a number of recommendations, which included:

- Updating Council Policy 000-51 to reflect housing as the number one priority
- Establishing an ongoing Homeless Advisory Committee to assist with the coordination, planning, integration and review of the City's Homeless Services Program

Establishing a Siting Guidelines Task Force to develop proposed siting guidelines for homeless program related projects

- Review, analyze, and prioritize a variety of additional recommendations requiring some level of funding

Included in the detailed recommendations are expanding housing options for families with extremely low and very low income and the physically disabled community and providing more permanent/supportive housing, emergency shelters for safe havens and emergency and transitional housing. These and all other issues will be followed up on once City Council approves the Manager's recommendations and establishes the Advisory Committee. Manager's Report 02-279 provides details of the recommendations and will be heard by the City Council in the near future. In addition, staff will continue to work with County staff to schedule a meeting after the Homeless Services Task Force Report is adopted by the City Council.

The Regional Continuum of Care Council has begun work on the 10 year plan to end homelessness. The City's Homeless Coordinator sits on this Council and takes a leadership role.

The dedication of resources to the development of a 10-Year Plan to End Homelessness with a clear focus on permanent housing opportunities.

The Homeless Services Division of the Community and Economic Development Department will dedicate resources to work collaboratively with the Regional Continuum of Care Collaborative, the Regional Task Force on the Homeless, providers, communities, the Homeless Services Task Force (formed to revise and implement the City's Comprehensive Homeless Policy 000-51), Housing Action Network, and others promoting the goal of developing a 10-Year Plan to End Homelessness in the City of San Diego as mandated by HUD. Homeless Services will ensure that the 10-Year Plan fulfills the City Council's strategic framework based on the Continuum of Care model, which includes the following elements:

1. Prevention
2. Outreach, Intake and Assessment
3. Emergency Shelters & "Safe Havens"
4. Transitional Housing
5. Permanent Housing
6. A system of support services appropriate to each of the stages listed above
7. A Systemwide infrastructure

Further, the Homeless Services Division acknowledges the importance of the Continuum of Care as a guiding policy for finding solutions to homelessness and is the basis of the proposed newly revised Comprehensive Homeless Policy. Included in the policy are detailed recommendations to expand housing options for families with extremely low- and very low-incomes and for people with physical disabilities, and to promote the development of more permanent supportive housing, safe havens, emergency and transitional housing beds. If the City Council approves the Manager's Recommendations for the establishment of the Homeless Services Advisory Committee, these and all other issues will be addressed

through the Advisory Committee. (Manager's Report 02-279 provides details of the recommendations and will be heard by City Council in the near future.) The City also recognizes that the strategies recommended within this proposed revised policy have been reinforced by the most recent Centre City Development Corporation (CCDC) Downtown Community Plan Update, which documents the importance of the Continuum of Care strategy and recognizes that an array of housing types and services are needed to effectively address the needs of San Diego's homeless residents.

The reinitiation of joint City Council / County Board of Supervisors planning efforts to address homelessness.

Developing the resources and strategies to address the diverse needs of homeless families and individuals, and shifting the emphasis from managing homelessness to ending it, requires a comprehensive approach to funding and service delivery. Homeless populations are generally identified as falling into three basic groups: 1) the chronically homeless who face the greatest challenges to achieving housing stability and self-sufficiency; 2) the episodically homeless who experience repeated periods of homelessness and use shelter services repeatedly; and 3) the situationally homeless who, because of unexpected circumstances, find themselves without housing but, once they achieve stable housing, rarely become homeless again. Each population of homeless San Diegans requires specific types of supportive services, alternative housing options, and, sometimes, treatment. In order to meet these housing and service needs and to accomplish the goal of ending homelessness in 10-years, active collaboration between City and County agencies is required, such as the City proactively working with the County Health and Human Services Agency to support mental health treatment and rehabilitation options within the shelter system, shared approaches to outcome measurements and financial accountability for agency service providers.

Supporting the strategies that are developed for ending homelessness will mean engaging the advocacy of local leadership to ensure State policies support local initiatives and to leverage additional State and Federal resources designed to help communities address, and end, homelessness. Joint City and County planning will be essential to the success of those efforts. City staff will continue to expand its collaborative relationships with County agencies and staff and will recommend that the City Council initiate new collaborative planning with the County Board of Supervisors.

This joint strategy to end homelessness by city and county leaders could serve as a model for collaborative preventative efforts. The justice system has many contacts with homeless persons through drug diversion programs, juvenile courts, and the prison and parole system. In addition, city and county educational staffs have constant contact with persons without a home who are in need of services. Joint city and county strategies to end homeless will proactively engage these potentially homeless persons, offering appropriate housing and clinical referrals.

An assessment of the progress and accomplishments of the City's Special Needs Homeless Initiative and the establishment of clear goals for the next phase of the implementation of that initiative.

The City's Special Needs Homeless Initiative was authorized through City Council action in December 1999 (Manager's Report 99-241) and represents one of the most successful examples of collaborative City / County planning efforts. Under this Initiative, the City works collaboratively with the County of San Diego,

the Centre City Development Corporation, the San Diego Housing Commission, non-profit homeless service providers, mental health organizations, and other interested or affected parties to assist the severely mentally ill, chronic inebriates, drug addicted, or dually-diagnosed homeless in the downtown area. Since its implementation, this Initiative has achieved the following objectives:

- The performance of a study to assess the current level of special needs homeless services, housing and facilities, and current computer information systems available to track this information and client data in the central data system.
- The formation of the AB 2034 Collaborative 3-years ago. The Collaborative received a \$10.1 million grant from California Department of Mental Health to establish the REACH Program and place 250 mentally ill and dually diagnosed persons in permanent housing while providing intensive case management and treatment. Through this Collaborative, a centralized homeless intake and referral function is currently housed in a leased facility. Further, to meet the housing needs of REACH Program clients, additional Safe Haven beds are provided at a housing facility at 5th and Olive operated by Episcopal Community Services, 50 SRO units have been leased in the Metro Hotel with Alpha Project providing supportive services, 100 Section 8 certificates were designated by SDHC to house mentally ill people, and the Program has leased 12 beds at the Mason Hotel for special needs clients.
- A CCDC-funded new construction project of Senior Community Centers of San Diego was approved, is currently under construction and will include 25 housing units for mentally ill, low-income seniors on Market Street.
- A St. Vincent de Paul project was approved that includes 25 housing units for mentally ill, low-income people and is currently under construction in East Village.
- Mid-Coast Counseling received County funding to provide mandatory treatment for 22 chronic inebriates enrolled in the Serial Inebriate Program (SIP).
- CCDC issued a collaborative Request for Proposals for Housing for San Diego's Special Needs Population, in partnership with the City of San Diego, the County of San Diego, the San Diego Housing Commission and the Corporation for Supportive Housing. Through this NOFA, \$2.25 million of joint funding has been awarded to Vietnam Veterans of San Diego for their proposal to develop 50 transitional housing beds for dually diagnosed and mentally ill clients.
- 14 units on Titus Street for special needs persons are currently being developed by The Association for Community Housing Solutions (TACHS).
- Received commitment from Catholic Charities to house 24 mentally ill women in new supportive housing project currently in pre-development for 9th and F Street location.

- The YMCA is in pre-development of a major rehabilitation of its existing SRO hotel on Broadway. Project management has committed to setting aside 25 rent-restricted units for special needs homeless adults.

The City of San Diego Homeless Services Division is currently working with its partners to assess progress toward achievement of the objectives outlined within the Special Needs Homeless Initiative. As part of this assessment process, the Homeless Services Division is committed to working with its partners to identify original Initiative objectives that still need to be achieved, threats to the stability of the Initiative's accomplishments to date, and the identification of priorities for new objectives, which might include additional housing programs and expanded services for people with chemical addictions. A progress report summarizing this assessment and making recommendations for new objectives for serving San Diego's special needs homeless residents will be submitted for the consideration of the City Council.

The inclusion of clear goals for the development of units affordable to ELI households.

Goals for the FY04 Action Plan, including goals for programs serving low income households are included within the Plan in the table entitled "Low-Income Households Estimated to be Assisted with Housing." This table was not available for inclusion in the first draft as the goal setting process is part of the Housing Commission's annual budget process and this process was not substantially complete when the draft Action

Plan was prepared. This table shows that approximately 869 ELI households will be assisted in FY04, which is 46% of the overall total of 1,913. The 5-year Plan sets a goal of creating an additional 7,500 units over the five year period, with an annual goal of 1,500 units. As noted, we anticipate creating an additional 1,913 units in FY04.

The dedication of a representative portion of housing development resources for use only for the development of units affordable to ELI households.

The Housing Commission's policy is to provide a multifaceted approach in meeting San Diego's affordable housing needs. This approach hinges on the provision of a variety of programs to meet the various housing needs of residents at all income levels, with the majority of the housing to be provided to the extremely-low (30% or below MAI) and low-income households (31-50% of MAI), with 90% of the overall assistance to be provided to these two income groups. Each program serves different income segments of the market and program rules dictate the level of affordability of the programs. For example, the Section 8 rental assistance program serves mostly ELI households. HUD requires that at least 75% of households assisted with this particular source of funds be allocated to ELI households. The Housing Commission's Rental Production program typically serves households with incomes at or below 50% of MAI. This does not preclude serving those at the 30% ELI level. In addition, the Housing Commission has a project-based Section 8 program that not only serves ELI households, but also serves special purpose populations including projects that provide supportive services. Developers of rental housing for ELI households can apply for funding at any time. These funds are part of the Housing Commission's Rental Housing Development NOFA.

The creation of a preference for, and prioritization of, supportive housing projects in the provision of affordable housing resources.

The FY04 Action Plan represents the fourth year in the City's five-year Consolidated Plan (FY2000-2005). Current priorities may be found on page 3-1, Activities Planned for FY04. These priorities were established during the development of the five-year Consolidated Plan. The annual updates of this Plan sets forth the activities to be completed in the upcoming year to address these priorities with the available resources. We are awaiting updated Census 2000 data from HUD, which pertains to the area's needs and, which data we will utilize to conduct a housing needs assessment. To date, HUD has not finalized its final 2000 Census tabulations. It is anticipated that these tabulations will be completed in the fourth quarter of calendar year 2003 and made available to the public shortly thereafter. Once the data is released, the City's Affordable Housing Needs and Priorities will be re-evaluated and all the new data will be incorporated into the development of a new comprehensive five-year plan for the period FY05-FY09.

Comments from Melvin Shapiro:

1. Will the City ever use the 2000 census figures? SANDAG should supply you with up to date figures so you don't use need figures that are 13 years old. If SANDAG can't do that, I would increase the 1990 figures by 10% since that is the population increase.

Response:

As previously noted, We are awaiting updated Census 2000 data from HUD, which pertains to the area's needs, which data we will utilize the conduct a housing needs assessment. To date, HUD has not finalized its final 2000 Census tabulations. It is anticipated that these tabulations will be completed in the fourth quarter of calendar year 2003 and made available to the public shortly thereafter. Once the data is released, the City's Affordable Housing Needs and Priorities will be re-evaluated and all the new data will be incorporated into the development of a new comprehensive five-year plan for the period FY05-FY09.

2. Section 3.1.2 Quotes from the Action Plan "identify actions to preserve at risk housing units" What addresses have been contacted or will be contacted? How many units are at risk? What have been the results of these contacts to date?

Response:

3. "Preserve the local affordable housing stock" How many units have been demolished? How many will be replaced? Give addresses for demolitions and replacements. How do rents compare for the demolished units and the replacements? What is the time frame between demolitions and replacements:

Response:

4. How many units have been and will be converted to condominiums? Based on past experience, what is the percentage of tenants that will buy units?

Response:

5. "increase the supply of affordable rental housing"? Please define affordable. Do you use the same definition as HUD glossary? What is the income limit for "affordable rental housing" do we need? What percent of the need is 108 units? Based on the chart, I assume there will be 200 units acquired. What are the addresses? What are the rents and income groups served?

Response: of the 108 units two projects: one is 92 units and is Briar Crest in the NCFUA-28 for extremely low income and 63 for low income (under 60% AMI) one is a manager unit and the other is 1440 South 40th Street-16 units and those are for very low income (under 50% AMI). The remaining two hundred units are units estimated to be funded with redevelopment monies. There are no addresses yet available for this estimate. These units would be made available to households earning 40-80% of median family income.

6. RE: Appendix B-HOME Program – Text says the TRBA may become inactive. This Plan should say yes or no. I am in favor of yes. The 30,000 households on the waiting list need help now. According to your Agency Plan they are 73%, 30% median income. But the TBRA-maybe Program specifies help going to people earning less 60% of median income. The 60% is misdirected. The budget should show HOME funds for rental assistance.

Response:

7. Sec. 1.4.1 – It uses the term "multi-family" units. We should know how many are rental and many are condominiums.
8. Under Strategies-CCDC, many projects are listed. But there is no timeframe as to when they will be available nor is there any way to know what income groups will benefit from each project. "low/mod doesn't tell me anything.

The following comments were received via e-mail and regular mail from Bob Hettinger, Chair of the Citizen's Review Committee:

As the Chair of the Citizens' Review Committee on ADA and Disability Issues, I am pleased to have the opportunity to provide input and recommendations to the City's Consolidate Plan. First, the Committee has formally voted to endorse the Accessible and Affordable Housing for All

Coalition (AAHA) position statement. (A copy is attached) Second, we wish to express our support of the recommendations made by The Access Center of San Diego. Both of these documents make clear that there is a critical shortage of affordable accessible housing in San Diego for people with disabilities. Here are some of the results:

We have heard about a homeless man who sleeps in his wheelchair under a bridge. We know someone who is unable to find an apartment with an accessible bathroom, so must do toileting activities in another room or take sponge baths because the shower is not accessible. We all have friends we cannot visit because their homes are not visitable.* We hear that the waiting list for Section 8 certificates is five years. We all know that there are not enough accessible affordable apartments, condominiums and houses; that there are not enough vouchers and grants; that there are not enough disabled people involved in policy development; that there is not enough knowledge about universal design.

Based on these concerns, we offer the following recommendations:

Fair Housing. Make sure that housing policy requires compliance with both the Fair Housing Act and Section 504 of the Rehabilitation Act. This means that all recipients of public funding must develop housing that is 100% adaptable (for all ground floor and elevator accessed housing) and that in addition 5% is made fully accessible. This also means that recipients of tax credits must comply with these requirements.

Monitoring. The City must monitor-including site visits-all developers and recipients of public funds including tax credits to assure compliance, and must develop a system for coding accessibility compliance, when all applications for housing projects are submitted for approval. Recipients of Low Income Housing Tax Credits may not discriminate against Section 8 voucher holders. Processes for plan check, and reviews at every level, whether "ministerial" or "discretionary," must take an active part in promoting explicit and detailed goals of increased accessibility in all new housing. Property owners should also be encouraged to add access features when remodeling or making additions to homes. These permit applications also can be "coded" to document whether access is included, regardless of whether it is (yet) required.

Antipoverty. The City must apply for all Section 8 funding available, including funding which is linked to Home and Community Based waiver programs, to ensure that housing is not a barrier for disabled persons to move from nursing homes into the community. The City should also request a higher rent ceiling on section 8 certificates-up to 140% of local market value-to compensate for the higher than average rents in San Diego.

Homeless. All homeless facilities and shelters must be fully accessible.

Impediments to Fair Housing. The Consolidated Plan refers to a "2000 Analysis of the Impediments to Fair Housing Study", yet there is no mention of architectural or programmatic accessibility as an impediment. Future studies must include the aspect of accessibility in the analysis. Such data/information is necessary to demonstrate, to those who need statistical

evidence, the need for additional public policies and programs to increase accessibility & adaptability in overall housing stock.

Programmatic Access. The City must have, or support, programs which link accessible apartments with people who need them. Landlords must make known the fact that apartments are accessible or adaptable, and must give priority to the extent possible to disabled consumers.

Advocacy. More people with disabilities must be involved as early as possible in the policy development and planning process.

Thank you for the opportunity to make these comments. We look forward to working with you in the next consolidated planning process.

Sincerely,

Bob Hettiger, Chair
Citizens Review Committee

*. Visitability: Minimum Features: One no-step entrance on an accessible path of travel, wide doors, light switches/environmental controls and electrical outlets at appropriate heights, bathroom toilet & sink approachable and useable by person in wheelchair.

The following letter was received from the Dr. Julie Saltman, Ph.D. of the HISA Task Force:

CalHOUSING INTEGRATION SET-ASIDE (HISA) TASK FORCE
12973 Candela Place (858)259-5690 San Diego, CA 92130

Re: Consolidated Action Plan/FY04

Mr. Sal Salas, President
San Diego Housing Commission
1625 Newton Ave.
San Diego, CA 92113

April 2, 2003

Dear Mr. Salas:

We are very pleased to note the renewal of the Relocation Fund in the City's Action Plan for FY04 (p.6-13). The Relocation Fund, for low-income homeseekers moving to less concentrated areas, helps the City achieve two of the vital goals stated in the Action Plan. These goals are: 1) "Reducing isolation of income groups...by de-concentrating affordable-housing opportunities...", and 2) "Empowering low-income persons...to achieve self-sufficiency".

By promoting freedom of choice in housing and deconcentrated mobility, the Relocation Fund enables low-income homeseekers to live in neighborhoods that offer better schools, better housing, and better job opportunities. Though a very small amount (\$15,000), the Relocation Fund may be the most cost-effective program in the City of San Diego. It cannot be measured in numbers, it cannot be measured in dollars, it can only be measured over the long-term in the improvement of human lives.

We know these long-term results from similar programs elsewhere, e.g. Chicago and Hartford. Mobility deconcentration programs show over time significant reductions of crime, illegitimacy, and drop-out rates for the young people involved, and increased job opportunities, educational achievement, and lifetime earnings for the young and their elders alike.

If this City can produce these results for 35 to 50 families a year, is this not a remarkable accomplishment for only \$15,000? For the past two years, the Fair Housing Council has offered Security Deposits from the Relocation Fund in its mobility counseling program. More than 90 families have already been assisted with these funds. We thank you for continuing this vital, worthy effort. Human lives are at stake.

Sincerely,



Juliet Saltman, Ph.D., State Coordinator and past HUD Consultant