

**FAIR HOUSING ACTION PLAN TO ADDRESS IMPEDIMENTS TO
FAIR HOUSING CHOICE
City of San Diego – FY 2025**

A. Regional Impediments Continued from 2020 AI

1. Lending and Credit Counseling

Impediment #1:

Hispanics and Blacks continue to be underrepresented in the homebuyer market and experience large disparities in loan approval rates.

Recommended Actions:

Coordinate with the Reinvestment Task Force to receive an annual report on progress in outreach and education.

Proposed Investment:

The San Diego Housing Commission includes support for the Reinvestment Task Force in its annual budget process.

Responsible Entities Assigned to Meet the Goals	Activities or Strategies to Meet the Goals	FY 2025 Accomplishments
Reinvestment Task Force	Quarterly public meetings, financial education or homeownership events co-hosted with/by partners, and collective impact projects.	The RTF's public meetings and hearings in FY 2025 highlighted the Middlemarch Fund for Middle Income Housing program, RTF advocacy and legislative engagement, affordable housing preservation strategy, federal small business equitable recovery program, local impact of executive orders, updates about Promise Zone, and a workshop on production of affordable for-sale housing. The RTF also conducted and reported on its annual Community Reinvestment Survey and began the process of updating its bylaws.

2. Overconcentration of Housing Choice Vouchers

Impediment #2:

Due to the geographic disparity in terms of rents, concentrations of Housing Choice Voucher use have occurred.

Recommended Actions:

- Expand the affordable housing inventory, as funding allows.
- Promote the Housing Choice Voucher program to rental property owners, in collaboration with the various housing authorities in the region.
- Increase outreach and education through the fair housing service providers, regarding the State's new Source of Income Protection (SB329 and SB222), defining Housing Choice Vouchers as a legitimate source of income for housing. These new laws went into effect on January 1, 2020.

Proposed Investment:

- Included in the City of San Diego's current Fair Housing Services contract.
- San Diego Housing Commission activities are included in its annual budget approved by the Board of Commissioners and the Housing Authority of the City of San Diego.

Responsible Entities Assigned to Meet the Goals	Activities or Strategies to Meet the Goals	FY 2025 Accomplishments
San Diego Housing Commission	1. Under the Mobility Counseling Program, SDHC assisted with pre- and post-moving counseling and security deposit loans for newly admitted families as tools to help participants prepare to enter the housing rental market and find suitable housing. 2. Landlord Partnership Program (LLP) provided incentives to attract new and retain existing property owners to the Section 8 Housing Choice Voucher Program. Incentives included a \$500 incentive for leasing a rental unit to a Section 8 Housing Choice Voucher household, access to a landlord assurance fund for coverage of damages and rent due that may exceed the security deposit up to a maximum of \$3,000, and a move flexibility fund that covers overlapping rents as a tenant moves from one unit to another. The LPP offered a team of dedicated staff,	1. Mobility Counseling 137 families received a total of \$241,736.50 in Security Deposit Loan Assistance - In FY25, Mobility Counselors assisted 31 households 2. Landlord Partnership \$768,000 was paid to landlords in leasing incentives to secure 1,536 units for HCV households \$32,102.99 was paid to landlords from the Landlord Assurance Fund \$13,554.03 was paid to landlords from the Move Flexibility Fund

	including a Landlord Liaison, to assist the property owners and tenants through the leasing process.	
Legal Aid Society of San Diego, Inc.	Provide a minimum of two presentations or workshops on fair housing rights to include education on the State's new source of Income Protection.	See Impediment #5 Outreach and Education for information. All trainings include education on the State's source of Income Protection.

3. **Housing Options**

Impediment #3:

Housing choices for special needs groups, especially persons with disabilities, are limited.

Recommended Actions:

- Increase housing options for special needs populations, including persons with disabilities, senior households, families with children, farmworkers, the homeless, etc. Specifically, amend the Zoning Code to address the following pursuant to new State laws:
 - Low Barrier Navigation Center (AB101)
 - Supportive Housing (AB139)
 - Emergency Shelter for the Homeless (AB139)
 - Accessory Dwelling Units (Abs 68, 671, 881, and 587 and SB13)
 - Specific actions by Jurisdictional are listed in the AI Impediments – Public Policies.
- Encourage universal design principles in new housing developments.
- Educate city/county building, planning, and housing staff on accessibility requirements.
- Encourage inter-departmental collaboration.

Proposed Investment:

- The City of San Diego and the Housing Commission will continue to allocate resources annually to homelessness programs that aim to permanently house persons and families experiencing homelessness, ensuring alignment with the City of San Diego's Community Action Plan on Homelessness.

- The City of San Diego and the Housing Commission will continue to invest in the development of permanent supportive housing units to meet the housing needs of persons with disabilities.
- City of San Diego General Plan Maintenance Fees

Responsible Entities Assigned to Meet the Goals	Activities or Strategies to Meet the Goals	FY 2025 Accomplishments
City Staff	Increase housing options for special needs populations, including persons with disabilities, senior households, families with children, farmworkers, the homeless, etc. Specifically, amend the Zoning Code to increase accessible housing options.	Housing Action Package (HAP) 2.0 was approved in December 2023. This package of code amendments implements state law to allow the construction of more new homes near transit, provides protections to existing residents, and increases the supply of land available for new home development. Amendments included: (1) Accessible Accessory Dwelling Units (ADU) Home Incentive expands housing opportunities for people with disabilities, mobility limitations, and special needs by providing an incentive for accessible ADU homes. As the City's population ages, the need for more accessible homes to accommodate people with disabilities will continue to rise, and this amendment assists in meeting the General Plan Housing Element goals. HAP 2.0 modifies the ADU Home Density Bonus program to incentivize the development of ADUs that meet the accessibility requirements in the California Building Code. The amendment allows one additional accessible ADU home if a residential development includes at least two deed-restricted affordable ADU homes. (2) Single Room Occupancy (SRO) Home Incentive amendment incentivizes the construction of new SRO housing to support the production of homes, particularly at the very low-income level. SRO housing provides a low-cost home option for community members, especially seniors and people with disabilities, to assist with meeting the City's Housing Element goals. Generally, existing SRO homes are within older buildings, and very few new SRO homes have been constructed in the last 30 years. This housing type often provides homes and shelter for those most vulnerable to becoming homeless and can either be a hotel guest room or a small self-contained room with shared living facilities. HAP 2.0 amends the Affordable

		Housing in All Communities program, which encourages more affordable housing construction throughout the City by allowing affordable homes built through the City's density bonus program and 100 percent affordable housing developments to be built in High Resource communities with a ministerial process to include SROs as a qualifying project. The amendment to this program allows for ministerial approval for SRO homes in areas near transit where affordable housing is either unavailable or very limited. (3) Complete Communities: Housing Solutions (CCHS) Amendments: CCHS is a City housing incentive program that provides a building FAR bonus to developments that provide affordable homes and neighborhood amenities. A. CCHS Development Regulations amendments remove or provide waivers of development requirements that discourage the use of the CCHS and/or discourage the development of new homes for families. Previous regulations like fence requirements or private exterior open space requirements discouraged the development of new homes under the CCHS programs. HAP 2.0 adjusted the development regulations that disincentivize family homes and/or the use of the CCHS program. New projects may receive a waiver of the private exterior open space requirement for development if at least 10 percent of all homes have three or more bedrooms. B. CCHS Development Impact Fees (DIF) amendment provides a new DIF waiver for homes with three or more bedrooms to incentivize the construction of new homes for larger households, including families with children and intergenerational families. These homes must be deed restricted for households earning no more than 150 percent of the Area Median Income and are limited to one lease per home. Additionally, since
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			CCHS was adopted in 2021, the City Council has adopted Citywide DIFs that are scaled based on home size, with smaller homes generally subject to payment of lower fees than larger homes. Therefore, the DIF scaling that was previously a benefit only under Complete Communities, is no longer relevant or necessary. C. 100 Percent Moderate Income Option amendments provide an alternative pathway to providing deed-restricted affordable homes under the CCHS program. The current regulations provide three options for providing affordable homes: i. Setting aside at least a total of 40 percent of pre-density homes (15 percent for very low income, 10 percent for low income, and 15 percent for moderate income) ii. Setting aside at least 40 percent of pre-density base homes for very low-income residents iii. Setting aside 100 percent of the total homes in the development for low-income residents. All levels of affordability are important to address the City's housing needs. In 2021, of the total homes permitted, less than 0.5 percent were deed-restricted at levels affordable for moderate-income households (approximately 9 percent were deed-restricted at levels affordable to very low-income and low-income households). By amending the CCHS program to promote moderate-income homes, the City can incentivize the development of more homes for moderate-income families, who often compete with low-income and very low-income families for naturally affordable occurring homes. HAP 2.0 creates a 100 percent base unit moderate-income option for the CCHS program. The new moderate-income option requires that at least 100 percent of base homes be
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		deed-restricted as affordable for moderate-income households. Additionally, at least half of all required rental homes must be rented at a cost that does not exceed 30 percent of 80 percent of Area Median Income, and the remainder must be rented at a cost that does not exceed 30 percent of 120 percent of Area Median Income. D. Incentivizing Family Housing amendments incentivize family housing by providing a FAR bonus. Recent developments in the City have tended to skew toward smaller single-bedroom homes, which makes finding “starter homes” and homes for families with children and intergenerational families more difficult and competitive. By incentivizing the development of homes with two or more bedrooms, CCHS better addresses the needs of families looking for homes closer to jobs, transit, and amenities. Additional development incentives for homes with two or more bedrooms can encourage the development of these needed housing product types for larger families. HAP 2.0 provides up to a 1.5 FAR bonus to a development that creates homes for larger families. To qualify for the bonus, at least 10 percent of the total homes must have at least two bedrooms, and an additional 10 percent of the total homes must have at least three bedrooms. Additionally, each home is required to be under one lease agreement per home. The proposed FAR bonus is in addition to other programs. (4) Single Room Occupancy (SRO) Home Incentive amendment incentivizes the construction of new SRO housing to support production of homes, particularly at the very low-income level. SRO housing provides a low-cost home option for community members, especially seniors and people with disabilities, to assist with meeting the City’s Housing Element goals. Generally, existing SRO homes are within older buildings, and very
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		few new SRO homes have been constructed in the last 30 years. This housing type often provides homes and shelter for those most vulnerable to becoming homeless and can either be a hotel guest room or a small self-contained room with shared living facilities. HAP 2.0 amended the Affordable Housing in All Communities program, which encourages more affordable housing construction throughout the City by allowing affordable homes built through the City's density bonus program and 100 percent affordable housing developments to be built in High Resource communities with a ministerial process to include SROs as a qualifying project. Amendments to this program allow for ministerial approval for SRO homes in areas near transit where affordable housing is either unavailable or very limited.
San Diego Housing Commission (SDHC)	1. SDHC uses MTW flexibilities and strategies to increase housing choice in San Diego by expanding its Project-Based Voucher (PBV) program. PBVs are a component of SDHC's Housing Choice Voucher (HCV) program, where rental assistance is attached to a specific unit and/or project instead of to an eligible assisted family.	1. The following Project-Based Voucher (PBV) properties completed construction and were leased up in FY 2025: • Levant Senior Cottages – 70 units for low-income seniors • Puesta Del Sol – 53 units for low-income seniors and 6 units for seniors experiencing homelessness • Tranquility at Post 310 – 20 units for veterans experiencing homelessness • Ventana Al Sur -- 25 units for seniors experiencing homelessness with severe mental illness • Messina – 8 units for low-income seniors • Presidio Palms – 81 units for individuals experiencing homelessness, 40 units for individuals experiencing chronic homelessness, and 40 units for Transition-age Youth (18-24) experiencing homelessness

	2. The HUD-VASH (Veterans Affairs Supportive Housing) Program combines HUD housing choice voucher rental assistance with case management and clinical services provided by Department of Veterans Affairs at its medical centers and in the community. 3. Permanent supportive housing (PSH) is rental housing that is affordable for low-income households and includes access to voluntary supportive services. In addition to developing new PSH units, SDHC also utilizes	• Southwest Village – 34 units for low-income individuals and families and 16 units for individuals and families experiencing chronic homelessness • The Shores at North Beach – 13 units for individuals experiencing chronic homelessness • El Cerrito – 40 units for individuals and families experiencing homelessness 2. In FY25, SDHC received an award of 75 Veterans Affairs Supportive Housing (VASH) Vouchers. 3. In FY25, 281 units of permanent supportive housing were developed and leased to households experiencing homelessness. Additionally, SDHC committed 5,897 housing vouchers to serve homeless populations.
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	a range of housing vouchers to address homelessness. These include Special Purpose Vouchers (SPVs), PSH-designated vouchers, and initiatives under the Moving to Work (MTW) program. 4. The Foster Youth to Independence initiative provides housing assistance on behalf of former foster youth or exiting foster youth ages 18-24 who are homeless or at risk of becoming homeless.	4. In FY25, SDHC received an award of 10 Foster Youth to Independence vouchers.
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4. **Enforcement**

Impediment #4:

Enforcement activities are limited.

Recommended Actions:

- Provide press releases to local media on outcomes of fair housing complaints and litigation.
- Support stronger and more persistent enforcement activity by fair housing service providers.
- Conduct random testing regularly to identify issues, trends, and problem properties. Expand testing to investigate emerging trends of suspected discriminatory practices.

Proposed Investment:

Included in the City of San Diego's current Fair Housing Services contract.

Responsible Entities Assigned to Meet the Goals	Activities or Strategies to Meet the Goals		FY2025 Accomplishments
Legal Aid Society of San Diego, Inc.	Conduct 25 random, paired fair housing tests and complaint-based tests to identify issues, trends, and problem properties. Expand testing to investigate emerging trends of suspected discriminatory practices.		Conducted 25 paired housing tests centered around familial status.
Legal Aid Society of San Diego, Inc.	Accept, investigate, and follow up on all fair housing complaints received.		• 2,299 inquiries were received and screened for fair housing issues. • 224 unduplicated investigations were implemented. • 179 unduplicated investigations were resolved. 45 are pending resolution.

5. Outreach and Education

Impediment #5:

Today, people obtain information through many media forms, not limited to traditional newspaper notices or other print forms.

Recommended Actions:

- Education and outreach activities to be conducted as a multi-media campaign, including social media such as Facebook, Twitter, and Instagram, as well as other meeting/discussion forums such as chat rooms and webinars.
- Involve neighborhood groups and other community organizations when conducting outreach and education activities.
- Include fair housing outreach as part of community events.

Proposed Investment:

Included in the City of San Diego's current Fair Housing Services contract. Partnership with the San Diego Regional Alliance for Fair Housing (SDRAFFH)

Responsible Entities Assigned to Meet the Goals	Activities or Strategies to Meet the Goals	FY 2025 Accomplishments
San Diego Legal Aid Society, Inc. Fair Housing Contract	Provide educational materials.	Distributed 4,110 multilingual informational brochures: • English: 2,291 • Spanish: 1,819
San Diego Legal Aid Society, Inc. Fair Housing Contract	Provide a minimum of two presentations or workshops on fair housing rights to include education on the State's new source of Income Protection.	46 fair housing educational trainings were conducted for home-seekers, homebuyers, and tenants on Fair Housing Rights; 533 people attended the educational trainings. Training highlights include: • Fair housing education workshops were conducted for Housing Choice voucher recipients. • Monthly fair housing webinars were held for residents. • 2 Free Fair Housing Training educational opportunities were conducted virtually for rental property owners, managers, landlords and community members during fair housing month; 163 people attended, and; • A fair housing training session was conducted for HUD subrecipients, as well as CDBG program staff; 45 people attended.
SDRAFFH Partnership	Regional meetings conducted to promote Fair Housing Education and training to the Community.	In FY 2025, the San Diego Regional Alliance for Fair Housing (SDRAFFH) consisted of 21 entities that included the City of San Diego, the San Diego Housing Commission, 17 cities, and 2 nonprofit organizations. The San Diego Housing Commission and the City of San Diego met quarterly as part of SDRAFFH to strategically plan and assess its continuation as a regional entity. The City of San Diego and the San Diego Housing Commission actively partnered with the region as SDRAFFH to plan activities that address the barriers outlined in the San Diego Regional Analysis of Impediments (AI) published in FY2020. Due to HUD's cancellation of the proposed Affirmatively Furthering Fair Housing rule in January 2025, regional plans to host a Fair Housing conference in April of 2025 were cancelled. SDRAFFH is

		strategically pivoting and planning regional educational activities to ensure San Diego continues to address its obligation to address discriminatory practices and promote communities that ensure equal access to housing opportunities with limited resources.
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6. Racial Segregation and Linguistic Isolation

Impediment #6:

Patterns of racial and ethnic concentration are present within particular areas of the San Diego region.

Recommended Actions:

- Diversity and expand the housing stock to accommodate the varied housing needs of different groups.
- Promote equal access to information for all residents. Update LEP plan to reflect demographic changes in the community per Executive Order 13166 of August 11, 2000.

Proposed Investment:

- General Funds, General Plan Maintenance Fees, and SDHC activities are included in its annual budget approved by the SDHC Board of Commissioners and the Housing Authority of the City of San Diego.

Responsible Entities Assigned to Meet the Goals	Activities or Strategies to Meet the Goals	FY 2025 Accomplishments
City Staff	Diversity and expand the housing stock to accommodate the varied housing needs of different groups.	Housing Action Package 2.0 also included the following code amendments: (1) Coastal Overlay Zone Affordable Housing Replacement expands protections and requires replacement of affordable dwelling units with very low-income units and expands application to premises with two or more structures containing a total of five or more units. Code amendment also eliminates the three-mile allowance for replacing affordable units and disallows the replacement of affordable units in low resource or high segregation and poverty resource California Tax Credit Allocation Committee Opportunity Areas. Off-site replacement affordable units in high or highest resource California Tax Credit Allocation Committee Opportunity Areas need to be relocated to an area that is also a high or highest resource California Tax Credit Allocation Committee Opportunity Area. (2) Priority Rental Preference for Affordable Units amendment gives existing residents in Low Resource or High Segregation and Poverty Resource California Tax Credit Allocation Committee Opportunity Areas, according to the most recent California State Treasurer TCAC/HCD Opportunity Area Maps, priority preference to rent new deed-restricted affordable units. The development of a new program to ensure priority preference is made available to community members in these areas will require collaboration with stakeholders, funding, and other actions to ensure it is effective in addressing displacement. Therefore, the priority preference requirements will not be implemented until a program can be developed and approved as part of a future action of the

		Housing Authority and/or City Council to ensure successful implementation. (3) Condo Conversion Regulations amendments implement state law to allow tenants of rental units proposed for conversion into a condominium a 90-day period to buy the condominium before the seller accepts other offers. (4) Discontinued Incompatible Uses creates an incentive to encourage the production of homes on properties within a zone that allows for homes and mixed-use development within the San Diego Promise Zone (SDPZ) as currently designated and ceases the continuation of incompatible previously conforming uses after a 15-year period. Through both community plan updates and code amendments, the City has continued to increase opportunities for additional homes in areas served by high frequency transit to address housing shortages while, simultaneously, reducing greenhouse gas emissions. The City continues to utilize recent and ongoing community plan updates to plan for higher density residential development on sites designated for residential, commercial, and mixed-use near transit. These sites are served by either existing or planned for high frequency transit within Sustainable Development Areas. Certain previously conforming uses, such as wrecking and dismantling motor vehicles, storage, and material scrap yards, as well as specific types of recycling facilities, are in areas that have been rezoned through community plan updates to allow for homes and mixed-use development. These uses can negatively affect community members and reduce the quality of life in the neighborhoods in which they are located, resulting in serious environmental injustices.
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		Many of these incompatible previously conforming uses are found within the federally designated SDPZ. The SDPZ is an area recognized by the federal government to contain the City's most disadvantaged and underserved communities. The SDPZ includes portions of Downtown, Barrio Logan, Southeastern San Diego, and the Encanto neighborhoods. The goals of the SDPZ designation include increasing economic activity, increasing access to affordable housing, and promoting access to healthy communities. To reduce land use incompatibilities that result in environmental injustices that expose residential uses to the effects of incompatible uses; while simultaneously increasing the availability of land for residential development, HAP 2.0 amended the following sections in the Land Development Code. i. Affordable Housing Regulations: FAR Incentive HAP 2.0 provides FAR incentives to sites zoned for housing within the SDPZ with an incompatible previously conforming use if the existing use is redeveloped into a residential conforming use. The FAR incentives provide a 0.5 FAR bonus to development that converts an incompatible, previously conforming use into homes that are consistent with the current zone on the property. The incentive can be increased to a 1.5 FAR bonus if the development includes at least 50 percent deed-restricted affordable homes. The incentive must be used within 15 years after a property is determined to be an incompatible previously conforming use. ii. Discontinuation of Incompatible Uses: HAP 2.0 amended the Land Development Code to no longer allow the continuation of an incompatible discontinued previously conforming use in the SDPZ if the use is ended for more than 30 days for any reason other than building maintenance,
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		repair, or safety. The purpose of the amendment is to encourage incompatible previously conforming uses to phase out, and where the use has been discontinued, no longer allow it to resume. iii. No Longer Permitted amended the Land Development Code to no longer allow incompatible previously conforming uses in the SDPZ (as currently designated) after a 15-year period from the effective date of the ordinance. (5) Housing on Publicly Owned and Non-Profit-Owned Land code amendment provided public agencies and qualified non-profit organizations greater flexibility in developing homes on publicly owned land by increasing the building Floor Area Ratio (FAR) bonuses and allowing development of affordable homes on properties zoned as commercial or residential. The first Housing Action Package amended the Land Development Code to allow by-right affordable and middle-income housing development on land owned by qualified non-profit organizations and public agencies to increase affordable opportunities for middle income community members like teachers, first responders, and nurses to live near where they work. Providing additional opportunities for affordable and middle-income homes helps to meet the General Plan Housing Element goals.
City Staff	Promote equal access to information for all residents.	The City continues to comply with the requirements of Executive Order 13166 and its Limited English Proficiency (LEP) Plan, ensuring meaningful access to programs and activities for individuals with limited English proficiency. The City provides translated materials and interpretation services, as appropriate, based on the four-factor analysis outlined in HUD guidance. In FY 2025, the City of San Diego is actively working to enhance language access and efficiency for its diverse population, building upon existing initiatives and incorporating new strategies in expanding translation and interpretation services. The City Clerk's Office has launched a pilot program to translate the City

			Council summary agenda into key languages such as Arabic, Chinese, Spanish, Tagalog, Japanese, Korean, Laotian, and Vietnamese.
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B. Jurisdiction-Specific Impediments Continued from 2020 AI

1. Public Policies

Impediments:

Various land use policies, zoning provisions, and development regulations may affect the range of housing choice available.

Recommended Actions:

Modified various land use policies to reflect current conditions, feasibility, and past efforts. Potential zoning amendments needed are Density Bonus, Accessory Dwelling Units, Transitional/Supportive Housing and Farmworker Employee Housing.

Proposed Investment:

General Funds

Responsible Entities Assigned to Meet the Goals	Activities or Strategies to Meet the Goals	FY 2025 Accomplishments
City Staff	Amend Zoning Ordinance, as necessary.	HAP 2.0 amended the San Diego Municipal Code to encourage the development of affordable off-campus student housing: 1) Affordable Density Bonus amended the affordable home density bonus program to allow for a density bonus range based on the percentage of homes deed-restricted for low-income students, consistent with the City's multifamily affordable home density bonus program. It also removes the requirement for student housing to provide an operating agreement with a college or university. 2) Supplemental Development Regulations amendment allows student housing development in any zone that allows for multifamily housing within a Sustainable Development Area or within 1-mile of a college or university campus. It also increases bicycle parking requirements while removing automobile parking minimums. City of San Diego Mayor Todd Gloria issued Executive Order 2023-1 resulting in the Affordable Housing Permit Now program. The Affordable Housing Permit Now program is for 100% affordable multiple dwelling unit projects and emergency shelters that propose to create new units and shelter opportunities. Projects eligible are those that don't require or have already obtained any relevant discretionary permits and now seek ministerial permit(s) for projects consisting of 100% affordable housing units. The entire housing project must be residential with every dwelling unit covenant-restricted by deed for a period of at least 55 years as affordable to very-low, low-, or moderate-income households, as those terms are defined in the San Diego Municipal Code (SDMC). Projects subject to specific review deadlines established by statute or ordinance, such as accessory

		dwelling units, or projects utilizing provisions related to post entitlement phase permitting, are not eligible. However, inclusion of nominal manager's unit(s) will not exclude a project. Other eligible projects are homeless shelters - emergency shelters and navigation centers that provide shelter, as described further in the Land Development Code portion of the SDMC. Over the program's first year, projects have been fully reviewed in nine days, on average. As of March 2024, the Affordable Housing Permit Now has fast-tracked 21 projects, totaling 2,356 new affordable homes, with another 478 in process. Of the permitted projects, 13 are already under construction, totaling 1,700 units.
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