FAIR HOUSING ACTION PLAN TO ADDRESS IMPEDIMENTS TO FAIR HOUSING CHOICE
City of San Diego – FY2026

A. Regional Impediments Continued from 2020 Analysis of Impediment (AI)

1. Lending and Credit Counseling

Impediment #1:
Based on the most current information available, Hispanics and Blacks continue to be underrepresented in the homebuyer market and experienced disparities in loan approval rates.

Recommended Actions:
Coordinate with the Reinvestment Task Force to receive annual reports from the Task Force 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		FY2026 Accomplishments
Reinvestment Task Force	Quarterly public meetings, financial education or homeownership events co-hosted with/by partners, collective impact projects.		The RTF's quarterly public meetings and hearings in FY2026 highlighted how partners collectively advanced affordable housing, economic empowerment, and social justice in the City and County of San Diego. Accomplishments include substantial loan deployment, job creation, housing development, community engagement, and targeted support for underserved populations. Strategic partnerships and innovative programs have driven measurable impact, positioning each partner as a leader in their respective domains. A few examples include building and repairing homes in partnership with families, advancing affordable homeownership and equity, hosting events and workshops, expanded educational platforms, and Delivering workshops, counseling, and advocacy for federally and state-protected classes, to ensure compliance and education for tenants and landlords. The RTF also conducted and reported out on its annual Community Reinvestment Survey and heard a comprehensive report on First Time Homebuyer Program administered by the San Diego Housing Commission for the City of San Diego, County of San Diego and the cities of Chula Vista and El Cajon.

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 legitimate source of income for housing. These new laws went into effect 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		FY2026 Accomplishments
San Diego Housing Commission	1. The Landlord Partnership Program (LLP) provided incentives to attract new and retain existing property owners to the Section 8 Housing Choice Voucher Program. Incentives included 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 covered overlapping rents as a tenant moves from one unit to another. Due to funding limitations, the Assurance Fund program ended May 1, 2026. SDHC's Mobility Program services, including housing search assistance were discontinued effective July 1, 2024. Effective February 16, 2026, SDHC also discontinued		1. Landlord Partnership • $42,267 was paid to landlords from the Landlord Assurance Fund • $6,330 was paid to landlords from the Move Flexibility Fund

	the Security Deposit Loan Assistance Program as part of cost-saving measures to prioritize available funding for ongoing rental assistance programs.		
Legal Aid Society of San Diego, Inc. – Pending confirmation	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. Training courses 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, persons experiencing homelessness, 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 is 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 experiencing homelessness with disabilities.
- City of San Diego General Plan Maintenance Fees

Responsible Entities Assigned to Meet the Goals	Activities or Strategies to Meet the Goals		FY2026 Accomplishments
City Staff	Increase housing options for special needs populations, including persons with disabilities, senior households, families with children, farmworkers, persons experiencing homelessness, etc. Specifically, amend the Zoning Code to increase accessible housing options.		Housing Action Package (HAP) 2.0 was approved in December 2023. During FY2026, the City continued implementation of HAP 2.0 initiatives that support the City's efforts to reduce barriers to housing development, increase housing choice, expand affordable housing opportunities, and affirmatively further fair housing. These efforts include the following: (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 meets 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 type of housing 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 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 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 few new SRO homes have been constructed in the last 30 years. This type of housing 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. 2. The HUD-VASH (Veterans Affairs Supportive Housing) Program combines HUD housing choice voucher rental assistance with		1. In FY2026, SDHC committed 40 Project-Based Housing Vouchers (PBV) through HomeKey to Starling Place, a project that will serve veteran households experiencing homelessness. The following Project-Based Voucher (PBV) properties completed construction and were leased up in FY2026: • Pacific Village – 15 units for veterans experiencing homelessness, 12 units for transitional age youth experiencing homelessness, 12 units for adults experiencing chronic homelessness, and 23 units for adults experiencing literal homelessness. • Serenade on 43rd – 32 units for individuals experiencing homelessness. • Cuatro at City Heights – 48 units for low-income individuals and families. • Harrington Heights – 10 units for veterans experiencing homelessness, 65 units for adults experiencing chronic and literal homelessness, and 40 units for low-income adults. • Jacaranda on 9th – 14 units for chronically homeless adults and 73 units for low-income individuals and families.

	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. 4. The Consolidated Appropriations Act, 2023 (P.L. 117-328) appropriated $50 million for new incremental vouchers. Incremental vouchers under this appropriation are regular Housing Choice Vouchers (Section 8).		• Taormina Family Apartments – 8 units for low-income individuals and families. • Iris at San Ysidro – 25 units for low-income families. • SkyLINE – 30 units for low-income individuals and families. • The Teralta – 33 units for low-income individuals and families. • Terrasini Senior Apartments – 8 units for low-income seniors. 2. In FY2026, SDHC received an award of 17 Veterans Affairs Supportive Housing (VASH) Vouchers. 3. In FY2026, 158 units of permanent supportive housing were developed and leased to households experiencing homelessness. 4. In FY2026, SDHC received an award of 75 additional Family Unification Program (FUP) vouchers.

4. <u>Enforcement</u>

<u>Impediment #4:</u>
Enforcement activities are limited.

<u>Recommended Actions:</u>
- 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 on a regular basis 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		FY2026 Accomplishments
Legal Aid Society of San Diego, Inc.	Conduct 20 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 20 paired housing tests centered around disability.
Legal Aid Society of San Diego, Inc.	Accept, investigate, and follow-up on all fair housing complaints received.		• 2,724 housing-related inquiries were received and screened for fair housing issues. • 225 unduplicated investigations were implemented. • 264 unduplicated investigations were resolved. 23 are still pending resolution.

5. **Outreach and Education**

Impediment #5:
Today, people obtain information through many media forms, not limited to traditional newspaper noticing 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.
- This includes 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		FY2026 Accomplishments
San Diego Legal Aid Society, Inc. Fair Housing Contract	Provide educational materials.		Distributed 3,571 multilingual information brochures: • English: 1,820 • Spanish: 1,751
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.		26 fair housing educational trainings were conducted for home-seekers, homebuyers, landlords, and tenants on Fair Housing Rights; 1,481 people attended educational trainings. Training highlights include: • Fair housing education workshops were conducted for Housing Choice voucher recipients. • Monthly fair housing webinars were held for residents. • Free Fair Housing Training educational opportunities were conducted virtually for rental property owners, managers, and landlords.
SDRAFFH Partnership	Regional meetings conducted to promote Fair Housing Education and training for the Community		Over the course of FY2026, 9 regional meetings were conducted, in addition to separate officer meetings. Efforts were dedicated to updating and redesigning the SDRAFFH website to improve information for the public and info sharing among alliance members.

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 community per Executive Order 13166 of August 11, 2000.
- SDHC's Language Access Plan (LAP)**:** Recent Executive Orders, and HUD's withdrawal of multiple fair housing guidance documents altered prior expectations related to language access, the San Diego Housing Commission continues to advance the efforts outlined in its July 2021 published Language Access Plan. SDHC remains committed to ensuring meaningful access for individuals with Limited English Proficiency, continuing translation of vital documents using technology and professional linguist services to maintain person centered accessible communication practices, and implementing LAP strategies designed to promote equitable access to housing programs and services

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		FY2026 Accomplishments
City Staff	Diversity and expand the housing stock to accommodate the varied housing needs of different groups.		Housing Action Package (HAP) 2.0 was approved in December 2023. During FY2026, the City continued implementation of HAP 2.0 initiatives that support the City's efforts to reduce barriers to housing development, increase housing choice, expand affordable housing opportunities, and affirmatively further fair housing. These efforts include the following: (1) Affordable Housing Replacement. HAP 2.0 expands affordable housing replacement protections, including within the Coastal Overlay Zone, and limits relocation of off-site replacement affordable units from high- or highest-resource areas to areas offering fewer opportunities. With HAP 2.0 becoming effective within the Coastal Zone on March 11, 2026, these provisions now apply in applicable Coastal Zone areas. (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 future action of the Housing Authority and/or City Council to ensure successful implementation.

			(3) Condo Conversion Regulation amendments implement state laws 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 HAP 2.0 includes Land Development Code provisions intended to address environmental justice concerns and increase opportunities for residential development by encouraging the transition of certain incompatible previously conforming uses located within the geographic area established as the San Diego Promise Zone. These provisions include Floor Area Ratio incentives for redevelopment of qualifying properties into housing, with additional incentives for developments that include at least 50 percent deed-restricted affordable homes, as well as regulations addressing the discontinuation and eventual phase-out of specified incompatible previously conforming uses. During FY2026, the federal San Diego Promise Zone designation concluded on June 6, 2026, following its 10-year designation period. The conclusion of the federal designation does not, by itself, terminate the applicable HAP 2.0 Land Development Code provisions, which were established based on the geographic boundaries of the San Diego Promise Zone identified in the regulations. The City continues efforts to address incompatible land uses and environmental justice concerns in underserved communities through its land use planning and regulatory activities. **(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. Update LEP plan to reflect demographic changes in community per Executive Order 13166 of August 11, 2000.		In FY2026, the City of San Diego continued to actively work 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 launched a pilot program on September 9, 2024, to bridge language barriers and foster civic participation among diverse local populations by translating the City Council summary agendas into key languages such as Arabic, Chinese, Spanish, Tagalog, Japanese, Korean, Laotian, and Vietnamese. The City regularly works to translate our community outreach and other materials into multiple languages, as needed.

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		FY2026 Accomplishments
City Staff	Amend Zoning Ordinance, as necessary.		Housing Action Package (HAP) 2.0 was approved by the City Council in December 2023 and became effective outside of the Coastal Zone on March 16, 2024. During FY2026, the City continued implementation of HAP 2.0 and achieved an important implementation milestone when HAP 2.0 became effective within the Coastal Zone on March 11, 2026. As a result, HAP 2.0 is now effective citywide. During the reporting period, the City continued implementing zoning and Land Development Code reforms established through HAP 2.0 to reduce regulatory barriers to housing production, expand housing opportunities, and facilitate affordable housing development. These reforms support increased residential development capacity, housing development near transit and employment opportunities, affordable housing in higher-resource communities, and a greater variety of housing types to address the needs of households at different income levels. Efforts related to affordable student housing and zoning included the following: 1. Affordable Student Housing Density Bonus. HAP 2.0 amended the City's affordable housing density bonus regulations to provide density bonuses based on the percentage of homes deed-restricted for lower-income students, consistent with the City's multifamily affordable housing density bonus framework. HAP 2.0 also removed the requirement for student housing developments to maintain an operating agreement with a college or university. These provisions are intended to reduce regulatory barriers and facilitate additional housing opportunities for lower-income students.

			2. Supplemental Development Regulations for Student Housing. HAP 2.0 expanded opportunities for student housing by allowing qualifying student housing development in zones that permit multifamily housing within a Sustainable Development Area or within one mile of a qualifying college or university campus. The regulations also increased bicycle parking requirements while eliminating minimum automobile parking requirements for qualifying student housing developments. During FY2026, implementation of the City's affordable student housing regulations continued. In addition, as part of the 2026 Land Development Code Update, the City Council adopted amendments to the Affordable Housing Regulations to implement changes in State Density Bonus Law established through Assembly Bill 3116. The amendments update eligibility and occupancy requirements for student housing developments providing deed-restricted affordable housing, address replacement housing requirements for developments receiving certain density bonuses and eliminate off-street parking requirements for qualifying student housing developments that provide at least 20 percent affordable dwelling units. These amendments further align the City's affordable student housing regulations with State law and support continued efforts to reduce regulatory barriers to housing for lower-income students. Affordable Housing Permit Now The City also continued implementation of the Affordable Housing Permit Now program during FY2026. The program was established pursuant to Mayor Todd Gloria's Executive Order 2023-1 to expedite the permitting of qualifying 100 percent affordable multifamily housing developments and emergency shelters.

			Affordable Housing Permit Now provides an enhanced and streamlined ministerial permit process for eligible projects through early coordination, dedicated project management, defined review timelines, and enhanced communication between applicants and City staff. Eligible residential projects must generally consist of 100 percent affordable housing, with dwelling units covenant-restricted by deed for a minimum of 55 years as affordable to very low-, low-, or moderate-income households. Qualifying emergency shelters and navigation centers may also participate in the program. During FY2026, the City continued utilizing Affordable Housing Permit Now to reduce permitting barriers and expedite the delivery of affordable housing and shelter opportunities. The program establishes a first-review timeframe of 30 business days or fewer for eligible projects and provides collaborative review meetings and dedicated project management to assist applicants in resolving permitting issues efficiently. As of March 2026, 16 projects had been completed through the Affordable Housing Permit Now program. The City continued processing projects through the program during the remainder of the reporting period, demonstrating continued implementation of expedited permitting strategies intended to facilitate the production of affordable housing. Together, implementation of HAP 2.0, affordable student housing regulations, Land Development Code updates, and Affordable Housing Permit Now demonstrate the City's continued efforts during FY2026 to address zoning, regulatory, and permitting barriers that may constrain the production of affordable housing and limit housing choice.