



Fiscal Year 2022 CAPER

**Attachment 4:
Fair Housing Report**

FAIR HOUSING REPORT
FY2022 Accomplishments for CAPER

A. Regional Impediments

The regional impediments identified below build upon prior analyses, present recommended actions to address City and regional impediments to Fair Housing choice and highlight the accomplishments for the fiscal year.

1. Lending and Credit Counseling

Impediment #1:

Hispanics and Blacks continue to be under-represented in the homebuyer market and experienced large disparities in loan approval rates.

Recommended Actions:

Coordinate with the Reinvestment Task Force to receive annual reporting 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	FY2022 Accomplishments
San Diego City-County Reinvestment Task Force (RTF)	4 quarterly public meetings; 3 financial education or homeownership events co-hosted with/by partners	In FY2021-22, the RTF held four quarterly public meetings and hearings focused on Special Purpose Credit Programs, Community Reinvestment Act (CRA) reform, research on and organizations helping create opportunities for homeownership for Black, indigenous and people of color (BIPOC) and/or low-to-moderate-income (LMI) households, and private equity purchases of affordable housing, among many other issues; co-hosted 3 virtual financial education and/or homeownership events; completed the fifth year of its collective action project to promote and offer free tax preparation services to LMI taxpayers, helping them access the Earned Income Tax Credit; monitored and analyzed the Federal Reserve’s proposed CRA reforms; and surveyed its member banks about their prior year reinvestment activity, analyzed the findings, and reported them out at an RTF public meeting.

2. Overconcentration of Housing Choice Vouchers

Impediment #2:

Due to the geographic disparity in terms of rents, concentration of Housing Choice Voucher use has 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:

- City of San Diego activities are included in the City’s current Fair Housing Service Provider 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	FY2022 Accomplishments
San Diego Housing Commission (SDHC)	<p>SDHC’s Choice Communities initiative provides families that receive rental assistance with more flexibility to choose to live in neighborhoods that offer more opportunities for transportation, schools, and employment. Section 8 Housing Choice Voucher (HCV) households moved to neighborhoods identified as Choice or Enterprise communities through this initiative.</p> <p>Under the Mobility Counseling Program, SDHC assists with pre- and post-moving counseling, housing search assistance, security deposit loans and guidance about neighborhood features for families moving to Choice or Enterprise Communities as tools to promote mobility into neighborhoods that offer more employment and education opportunities.</p>	<p>Choice Communities</p> <ul style="list-style-type: none"> • 1,586 HCV households moved to Choice or Enterprise communities <p>Mobility Counseling</p> <ul style="list-style-type: none"> • 125 families received a total of \$221,878 in Security Deposit Loan Assistance • A Mobility Counselor contacted 532 households

	<p>Landlord Partnership Program (LLP) continues to provide incentives to attract new and retain existing property owners to the Section 8 Housing Choice Voucher Program. Incentives include 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 offers a team of dedicated staff including a Landlord Liaison to assist the property owners and tenants through the leasing process.</p>	<p>Landlord Partnership</p> <ul style="list-style-type: none"> • \$480,500 was paid to landlords in leasing incentives to secure 961 units for HCV households • \$19,775 were paid to landlords from the leasing assurance fund • \$752 were paid to landlords from the move flexibility fund
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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 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 with disabilities.
- City of San Diego General Plan Maintenance Fees

Responsible Entities Assigned to Meet the Goals	Activities or Strategies to Meet the Goals	FY2022 Accomplishments
City Staff	Increase housing options for special needs populations, including persons with disabilities, senior households, families with children, farmworkers, the homeless, etc.	The City of San Diego passed a housing action package that included a Housing Accessibility Program. The <i>Housing Accessibility Program</i> provides incentives to housing developments that include more accessible housing, including housing for people that are elderly or people with disabilities.
San Diego Housing Commission (SDHC)	<p>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.</p> <p>The American Rescue Plan Act (ARPA) of 2021 appropriated federal funding for new incremental emergency housing vouchers. The Emergency Housing Voucher (EHV) Program provides tenant-</p>	<p>In FY22, SDHC committed 141 Project-Based Housing Vouchers (PBV) through a competitive Notice of Funding Availability (NOFA) process to projects that serve households with low income and/or experiencing homelessness. Projects with PBV include: The following Project-Based Voucher (PBV) properties leased up in FY22:</p> <ol style="list-style-type: none"> 4. Hacienda Townhomes 19 units – for low income households 5. Trinity Place 73 units – for homeless seniors 6. Ivy Apartments 52 units – homeless seniors 7. Keeler Court 7 units – homeless veterans 8. St. Teresa 254 PBV units; and 16 VASH units – for homeless and homeless veterans <p>In FY22 SDHC received an award of 480 Emergency Housing Vouchers (EHV)³</p>

	<p>based rental assistance to assist families who are: experiencing homelessness; at risk of experiencing homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; and recently homeless and for whom providing rental assistance will prevent the family's homelessness or having a high risk of housing instability.</p> <p>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.</p> <p>Permanent supportive housing (PSH) is rental housing that is affordable for low-income households and includes access to voluntary supportive services³</p> <p>Continued operation of emergency and interim</p>	<p>In FY22 SDHC received an award of 50 Veterans Affairs Supportive Housing (VASH) Vouchers³</p> <p>In FY22, 402 units of permanent supportive housing were developed and leased to households experiencing homelessness.</p>
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	<p>shelters in the City of San Diego.</p> <p>Continued operation of low barrier Homeless Response Center</p>	<p>In FY22 the following shelters were either opened or approved for operations:</p> <ul style="list-style-type: none"> • Harm Reduction Shelter was approved in September 2021 and opened in December 2021. The shelter supports 44 beds for men and women experiencing homelessness who have active substance use disorder. • Women’s Interim Shelter was approved in March 2022 with implementation planned for late July 2022. The shelter supports 40 women experiencing homelessness. • The Sprung Interim Shelter was approved in May 2022 with implementation planned for early fiscal year 2023. The shelter supports up to 150 men and women experiencing homelessness. <p>SDHC continues to operate the Homelessness Response Center, a low barrier center offering system navigation for individuals and families experiencing homelessness.</p>
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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 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	FY2022 Accomplishments
Legal Aid Society of San Diego, Inc.	Conduct 25 random, paired fair housing tests and complaint-based test to identify issues, trends, and problem properties. Expand testing to investigate emerging trends of suspected discriminatory practices.	Conducted 43 paired housing tests centered around source of income.
Legal Aid Society of San Diego, Inc.	Accept, investigate, and follow-up on all fair housing complaints received.	<ul style="list-style-type: none"> • 1,731 fair housing inquiries were received. • 175 unduplicated investigations were implemented. • 159 unduplicated investigations were resolved. From these investigations, 3 were conciliations, 0 were referred to HUD and 0 DEFH. 16 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.
- Include fair housing outreach as part of community events.

Proposed Investment:

Included in the City of San Diego’s current Fair Housing Services contract and the 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	FY2022 Accomplishments
City of San Diego	Provide educational materials	<p>Designed and created a new PSA to promote fair housing. The PSA aired on the City TV and on Cox Cable during Fair Housing Month.</p> <p>Distributed one fair housing newsletter, "Practice Fair Housing" that is posted on the Fair Housing webpage and distributed throughout the community.</p>
San Diego Legal Aid Society, Inc. Fair Housing Contract	Provide educational materials	<p>Distributed 6,028 multilingual informational brochures:</p> <ul style="list-style-type: none"> • English: 3,014 • Spanish: 3,014
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.	<p>51 fair housing trainings were conducted for home-seekers, homebuyers, and tenants; 506 people attended the trainings. Training highlights include:</p> <ul style="list-style-type: none"> • Fair housing education workshops were conducted for Housing Choice voucher recipients. Conducted in English and Spanish. • Monthly fair housing webinars were held for residents. • "Free Fair Housing Training for Housing Providers" was provided virtually to rental property owners and managers; 40 people attended, and; • A fair housing training session was conducted for HUD subrecipients, as well as CDBG program staff; 69 people attended.
San Diego Regional Alliance for Fair Housing (SDRAFFH); Participating Jurisdictions in the San Diego Region; and Fair Housing service providers	Host an annual Fair Housing Conference that promotes Fair Housing Education to the Community	<p>In collaboration with participating jurisdictions in the San Diego region, a virtual Fair Housing Conference (Unraveling Segregation) was held; 175 attendees participated including: housing professionals, non-profit organizations, students, and the community at large.</p>

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:

- Diversify 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.

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	FY2022 Accomplishments
City Staff	Diversity and expand the housing stock to accommodate the varied housing needs of different groups.	<p>The City of San Diego adopted a new citywide initiative called “Homes for All of Us”. This initiative includes three components: a new community plan update framework called Blueprint San Diego, the creation of a middle-income housing working group and the Housing Action Package. The Housing Action Package aligns city policy with state law and incentivizes new housing opportunities. Policies in the initial housing action package include:</p> <ul style="list-style-type: none"> • <i>Affordable Housing in All Communities:</i> These amendments incentivize affordable housing in areas located near transit, identified as Highest and High Resource Communities by the State of California in the California Tax Credit Allocation Committee Opportunity Area Maps, and in community planning areas with less than 5% deed-restricted affordable housing. • <i>Employee Housing Incentive Program:</i> These amendments allow non-residential development to pay into the Inclusionary Housing Fund of the Affordable Housing Fund in exchange for development incentives, as specified in the attached Employee Housing Incentive Program Fee resolution. • <i>Live/Work Flexibility:</i> These amendments change the requirements for Live/Work units to encourage more opportunities for living and working in the same space. • <i>Housing at City Facilities:</i> These amendments allow for by-right housing developments on existing and new publicly owned sites. • <i>Housing Accessibility Program:</i> These amendments provide incentives to housing developments that include more accessible housing, including housing for people that are elderly or people with disabilities. • <i>Housing for Families:</i> These amendments incentivize the construction of housing units with three or more bedrooms to allow families of all sizes more housing opportunities.

		<ul style="list-style-type: none"> • <i>Affordable Housing Permit Requirements:</i> These amendments remove the requirement for additional discretionary permits for increases in density for development that complies with the City’s affordable housing regulations. • <i>Accessory Dwelling Units:</i> The amendments to the ADU and JADU regulations regulate new setback requirements to address privacy, landscape and street tree requirements and DIF requirements to address supportive infrastructure. • <i>Senate Bill 9:</i> The City will ministerially approve up to two homes on a single-family zoned lot and/or allow for the split of one single-family zoned lot into two lots of about the same size.
<p>City Staff and San Diego Housing Commission (SDHC)</p>	<p>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.</p>	<p>The City regularly works to translate our community outreach and other materials into multiple languages.</p> <p>SDHC expanded written translation of vital documents from English to provide equitable access to SDHC programs to persons served with Limited English Proficiency. The expansion includes written translation of vital documents for the two most encountered languages other than English for 5 SDHC programmatic areas including Rental Assistance, Property Management, Workforce and Economic Development, Loan Services and Homeless Programs.</p>

B. Jurisdiction-Specific Impediments

The following jurisdiction-specific impediment was identified from prior analyses and the recommended action was modified to reflect current conditions, feasibility, and past efforts.

1. Public Policies

Impediments:

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

Recommended Actions:

Amendments to zoning and land use policies may be needed to address 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	FY2022 Accomplishments
City Staff	Amend Zoning Ordinance, as necessary.	The City of San Diego amended zoning regulations to align with state law and incentivize the creation of new homes. Specifically, the City amended regulations regarding urban lot splitting and the development accessory dwelling units to align with the 2021 Senate Bill 9 and developed new incentives for the development of affordable new homes through density bonus programs. The City also amended the Land Development Code with minor revisions that improve the housing development process and eliminate redundancies.