

APPENDIX HE-A - ASSESSMENT OF FAIR HOUSING

The Assessment of Fair Housing for the City of San Diego's 2021-2029 Housing Element is organized as follows:

- Integration and Segregation Patterns
- Racially and Ethnically Concentrated Areas of Poverty (RECAPs)
- Disparities in Access to Opportunity
- Disproportionate Housing Needs Including Displacement
- Sites Inventory
- Fair Housing Enforcement and Outreach Capacity
- Contributing Factors and Conclusion
- Fair Housing Issues, Contributing Factors, and Meaningful Programs/Actions Table

INTEGRATION AND SEGREGATION

Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area.

Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.

REGIONAL AND LOCAL PATTERNS AND TRENDS

The following section address regional and local patterns and trends of integration and segregation of protected classes and income levels. This includes integration and segregation on the basis of race and/or ethnicity, income, familial status, and disability. When discussing regional, county-wide patterns and trends, much of the following information has been pulled directly from the *San Diego Regional Analysis of Impediments to Fair Housing Choice* (SDAI), published in August 2020 and prepared on behalf of the San Diego Regional Alliance for Fair Housing.

Race and Ethnicity

The SDAI notes, “race and ethnicity have implications on housing choice in that certain demographic and economic variables correlate with race. For example, median household income in the county between 2013 and 2017 was \$70,588. However, the median income for Black, Hispanic American Indian, and Alaska Native households was less than 75 percent of the county median while Asian and White household median incomes were 125 and 114 percent of the county median income.”

“Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility. Nationally, HUD data show that race-based discrimination ranks second in discrimination of protected classes, behind discrimination related to disability.”

Regional Patterns and Trends

According to the SDAI, “the San Diego region’s racial and ethnic composition trends mirror those seen at the national level. The nation’s demographic profiles are becoming increasingly diverse in their racial and ethnic compositions. As of 2010, the most diverse communities in the U.S. were disproportionately western, southern, and coastal metropolitan areas and their principal cities and suburbs. Studies have found that areas with a strong government and/or the military employment base, as is the case in the San Diego region, tend to be more diverse in general.”

“As recently as 1970, the vast proportion of the population in the State was predominantly White whereas now, non-White races (classified as minorities) are the majority in California. When a population’s racial and ethnic composition is more than 50 percent non-White, the population is said to have a minority-majority. The County of San Diego became a minority-majority area between 2000 and 2010, when the percent minority population increased from 45.1 to 51.5 percent. The proportion

of minority population continued to increase between 2010 and 2017 to 53.8 percent.” Table A-1 illustrates the racial and ethnic composition of the City of San Diego in relation to the county and state.

Table A-1: Racial and Ethnic Composition*

Jurisdiction	White	Black	Hispanic	Asian/ Pacific Islander	Other	Percent Minority 2010**	Percent Minority 2017**
City of San Diego	43%	6.1%	30%	17%	3.4%	55%	57%
County of San Diego	46%	4.7%	33%	12%	4.0%	52%	54%
State of California	38%	5.5%	39%	14%	4.6%	60%	62%
*Data Excerpted from <i>San Diego Regional Analysis of Impediments to Fair Housing Choice</i> , August 2020							
** Minority is defined as Blacks, Hispanics, Asian/Pacific Islanders, and all others not White.							

“After White residents, the largest racial/ethnic group in the county is Hispanic. As seen in Table 10, White residents make up the single largest percentage of San Diego County residents (46.2 percent), while Hispanic residents made up 33.4 percent. Asians/Pacific Islander, Blacks, and other groups followed with 11.9 percent, 4.7 percent, and 3.9 percent, respectively (Table 10). The cities of National City, Chula Vista, Imperial Beach, Escondido, and Vista have significant Hispanic concentrations (greater than 50 percent), while the city of Del Mar has the smallest proportion of Hispanic residents (4.7 percent). The largest concentrations of Asian/Pacific Islander populations reside in National City, San Diego, and Chula Vista. The City of Lemon Grove has the highest concentration of Black residents (13 percent) while the second highest concentration of Blacks was in La Mesa (7 percent). Del Mar, Poway, Solana Beach, Carlsbad and Encinitas have the smallest proportions of Black residents, where Blacks make up less than one percent of their population.”

As illustrated in Figure A-1, the SDAI found that “Patterns of racial and ethnic concentration are present within particular areas of the San Diego region... In San Diego County, the minority population is concentrated in the southern areas of the City of San Diego and continuing south. This pattern can be attributed to the traditional cluster of minorities living in the urban core and near the U.S./Mexican border. Another concentration is visible in the northwestern part of the North County East sub-region just west of the Cleveland National Forest. This area is home to several Native American reservations. An additional swath of minority concentration can be found in the University and Mira Mesa communities of the City of San Diego. Clusters of minority populations are also found in the North County cities of Oceanside, Vista, San Marcos, and Escondido.”

The SDAI further noted that:

- In San Diego County, 15.4 percent of residents indicated they spoke English “less than very well” and can be considered linguistically isolated.
- The cities of National City, Chula Vista, El Cajon, and Escondido have the highest percentage of total residents who spoke English “less than very well”. Most of these residents were Spanish speakers.

Figure A-1: Minority Concentration Areas County-Wide (Figure Captured from SDAI)

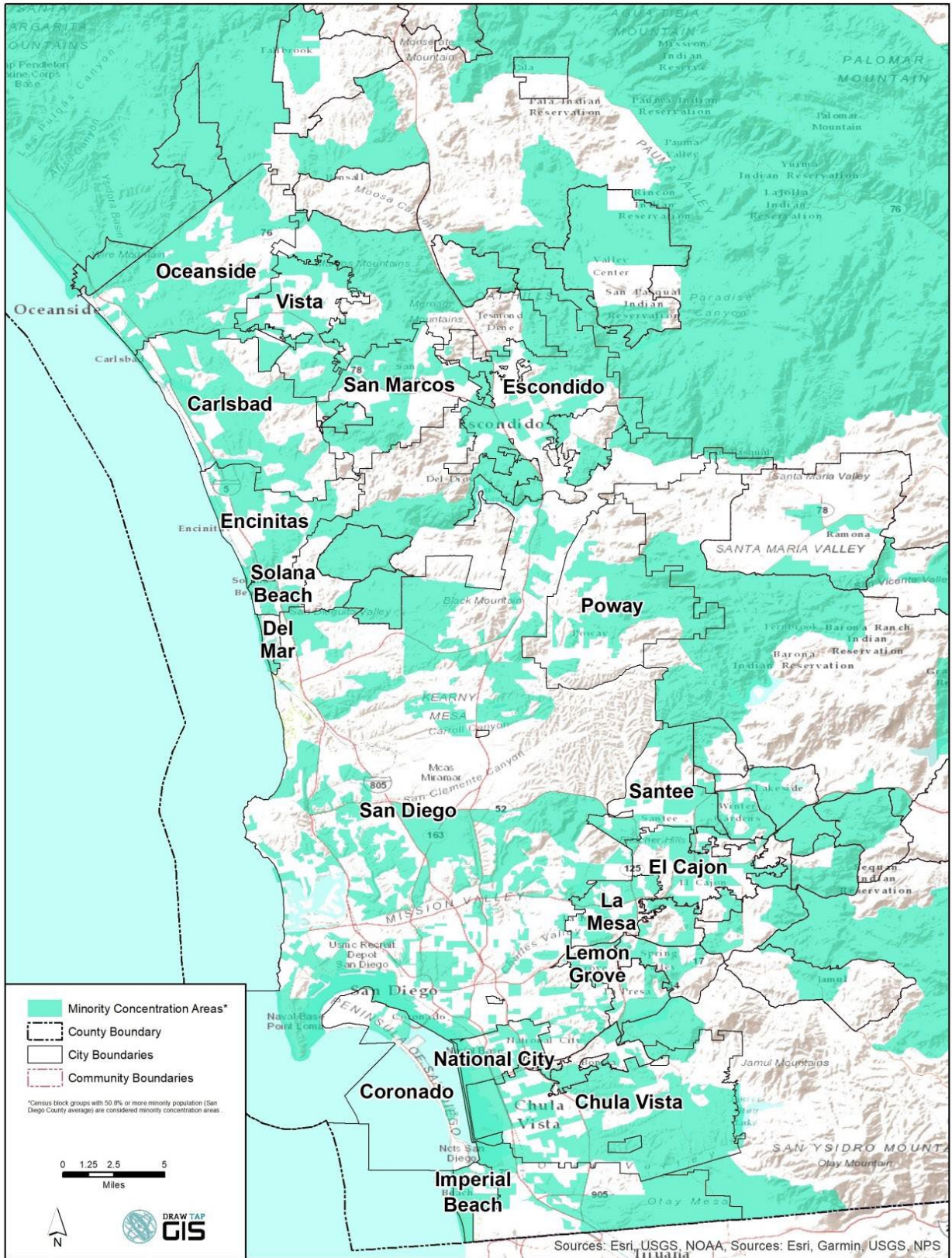


Figure A-2. Predominant Populations in the County of San Diego (AFFH Data Viewer)

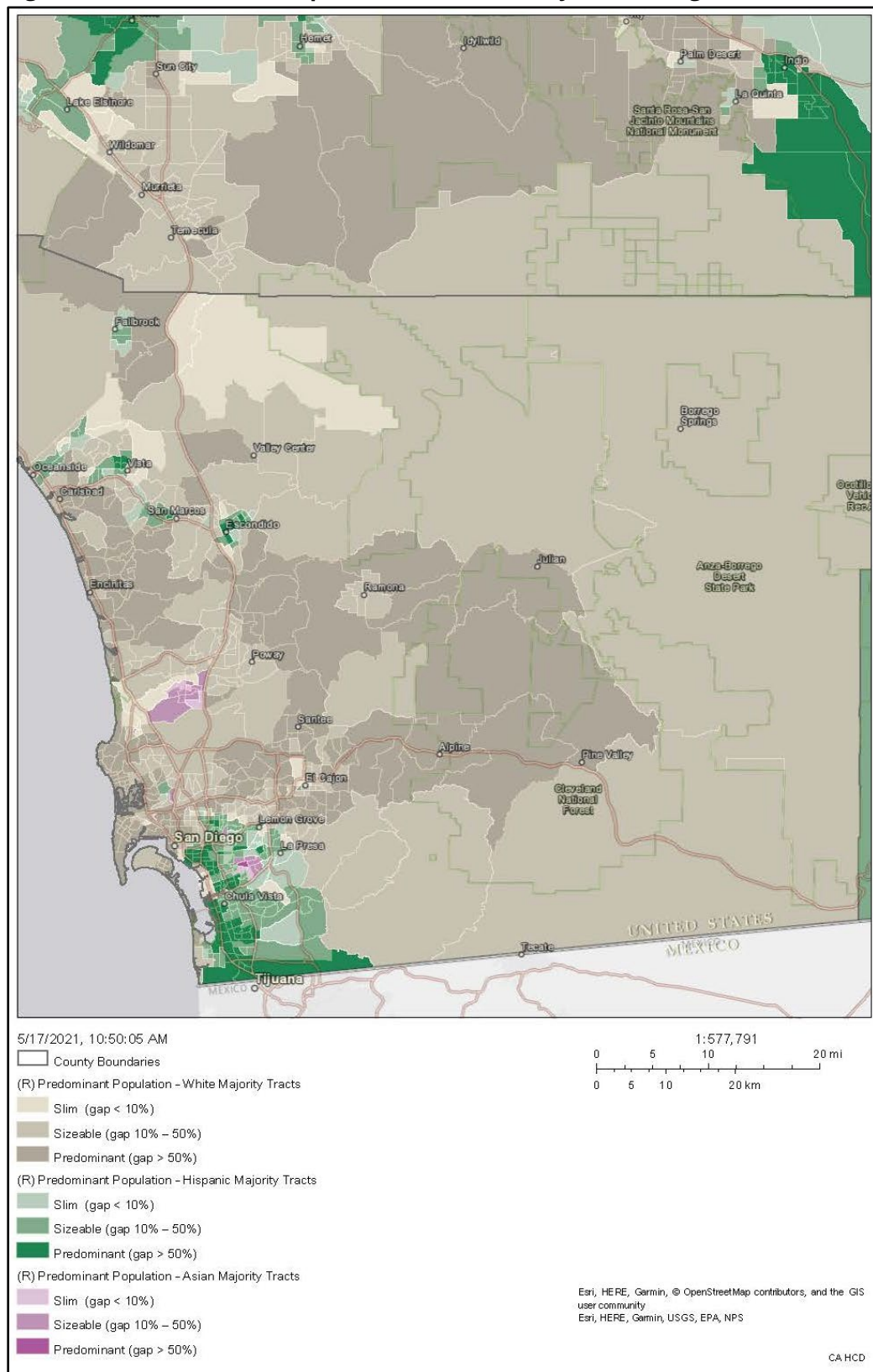
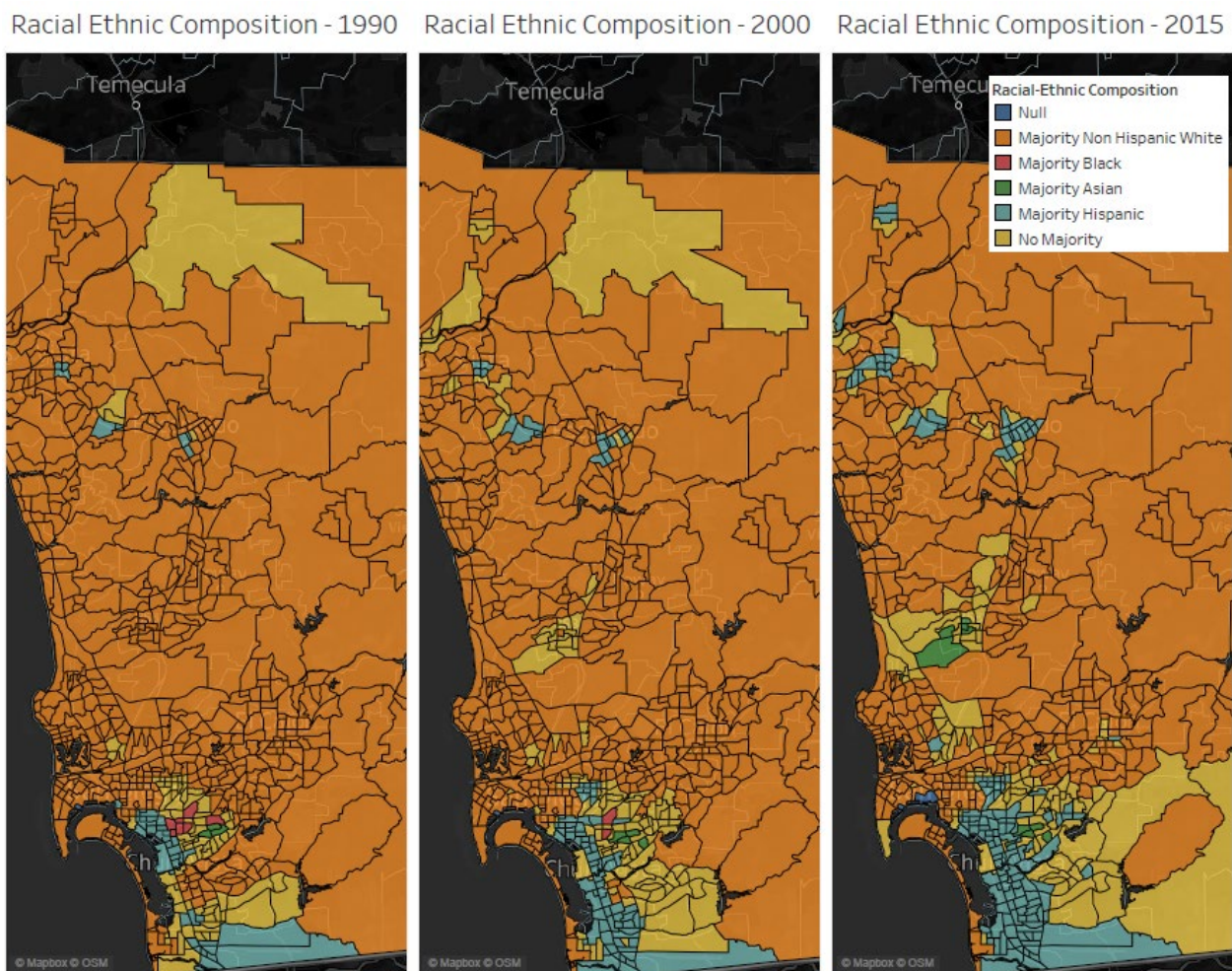


Figure A-3: Racial-Ethnic Composition 1990-2015 - San Diego County Region



The maps in Figure A-3 illustrate the change in race and ethnicity in the San Diego region through recent decades. In 1990, much of the region was majority White except for the areas in the City of San Diego reflecting a history of redlining, restrictive covenants, disparate treatment, and suburban expansion inhabited by Non-Hispanic White households. In the southern areas of the City of San Diego there are areas of with majority Hispanic, Asian, and Black. Along with areas that do not have a Majority indicating a mix of races and ethnicities. By the year 2000, the northern region of San Diego is changing from majority Non-Hispanic White to Majority Hispanic or No Majority. The central region shows changes from a Majority Non-Hispanic White racial and ethnic composition to No Majority. Within the City of San Diego, there are changes from No Majority to Majority Hispanic, the Majority Asian increased in a small area, and the Majority Black, decreased to Majority Hispanic and No Majority. In the southern region, of National City and Chula Vista, changes include more Hispanic majorities, and the Majority Non-Hispanic White is changing to No Majority. In 2015, the maps show a much larger concentration of Majority Hispanic, and No Majority indicating these areas are in transition. The Majority Asian population has increased in the central region, and Majority Black areas in the City of San Diego have disappeared. The southern region has converted to a Majority Hispanic or No Majority. Table A-2 compares the current racial and ethnic composition of residents in San Diego

County and the City of San Diego to other large California cities, the state of California, and the nation as a whole.

Table A-2: Race and Ethnicity in San Diego County and the City of San Diego in a State and National Context ([2019 American Community Survey](#))

	U.S. Percentage	California Percentage	San Diego County Percentage	City of San Diego Percentage	City of Los Angeles Percentage	San Francisco Percentage
Race						
<i>One Race</i>	96.6%	95.0%	94.4%	94.4%	96.0%	94.3%
White	72.0%	59.4%	70.9%	65.4%	52.1%	45.2%
Black	12.8%	5.8%	4.9%	6.1%	8.7%	5.5%
American Indian or Alaskan Native	0.9%	0.8%	0.7%	1.5%	0.8%	0.4%
Asian/Pacific Islander*	5.9%	15.2%	12.5%	17.5%	11.8%	35.3%
Some Other Race**	5.0%	13.7%	5.3%	4.9%	22.6%	7.9%
<i>Two or More Races</i>	3.4%	5.0%	5.6%	5.6%	4.0%	5.7%
Hispanic or Latino and Race						
Hispanic or Latino (of any race)	18.4%	39.4%	34.1%	30.3%	48.2%	15.2%
Mexican	11.3%	32.6%	30.4%	26.6%	32.1%	7.5%
Puerto Rican	1.8%	0.6%	0.9%	0.8%	0.4%	0.6%
Cuban	0.7%	0.2%	0.2%	0.3%	0.3%	0.3%
Other Hispanic or Latino	4.6%	6.0%	2.6%	2.7%	15.4%	6.8%
Not Hispanic or Latino	81.6%	60.6%	65.9%	69.7%	51.8%	84.8%
White alone	60.0%	36.3%	44.8%	42.6%	28.7%	39.8%
Black or African American alone	12.4%	5.5%	4.7%	5.8%	8.3%	5.2%
American Indian and Native Alaskan alone	0.7%	0.4%	0.4%	0.2%	0.2%	0.3%

Asian/Pacific Islander* alone	5.8%	15.0%	12.2%	17.2%	11.6%	35.0%
Some other race** alone	0.3%	0.3%	0.2%	0.2%	0.3%	0.4%
Two or More Races	2.5%	3.1%	3.6%	3.6%	2.5%	4.1%
*Combines “Asian” and “Native Hawaiian and Other Pacific Islander” demographics ** The Census Bureau also includes a category called “Some Other Race” for those who do not identify with any of the categories in the standard.						

Local Patterns and Trends

As shown in Table A-1, the City of San Diego has become an increasingly ethnically and racially diverse community. In 2020, 34% of the population was White, 32% was Hispanic, 17.5% was Asian/Pacific Islander, 6% was Black, 0.3% was Native American, 0.3% was “other”, and 4% was two or more races. Most racial and ethnic groups are expected to grow, though White and Black racial groups are expected to decline by 2035.

Census data shown in Figure A-4 reveals concentrations of the various racial and ethnic groups within the City. The majority of census tracts, primarily those along the coast and in lower-density Post-WWII suburban communities are majority-White. Exceptions can be seen in the majority-Asian/Pacific Islander communities of Mira Mesa and parts of Linda Vista, which were developed in the Post-WWII period. Predominantly Hispanic tracts can be found in the southeastern and southern areas of the City stretching down to the boarder communities of San Ysidro and Otay Mesa. This includes older areas of the City that have historically been occupied by Hispanic populations, as well as newer development in proximity to the border. No census tracts were found to have majority Black or Native American populations.

Figure A-5, which includes three maps, shows residential patterns in race and ethnicity and examine trends in racial and ethnic integration and segregation from 1990 to 2015. Much of the geographical area of the City of San Diego was majority White in 1990, with majority Black, Hispanic, and Asian areas confined to southern portions of the City - reflecting a history of redlining, restrictive covenants, disparate treatment, and suburban expansion inhabited by predominantly Non-Hispanic White households. Since 1990, the maps highlight segregation and integration trends that include:

- Increasing integration in some of the northern suburbs, with some northern suburban census tracts becoming Majority Asian
- Expansion of central and southern census tracts that are Majority Hispanic
- Reduction in the number of central census tracts that are Majority Black

During the same timeframe, the City’s Hispanic population increased from 20.7% to 30.5%; its Asian population increased from 11.8% to 16%; and its Black population decreased from 9.4% to 6%.⁸

Figure A-4. Predominant Populations in the City of San Diego (AFFH Data Viewer)

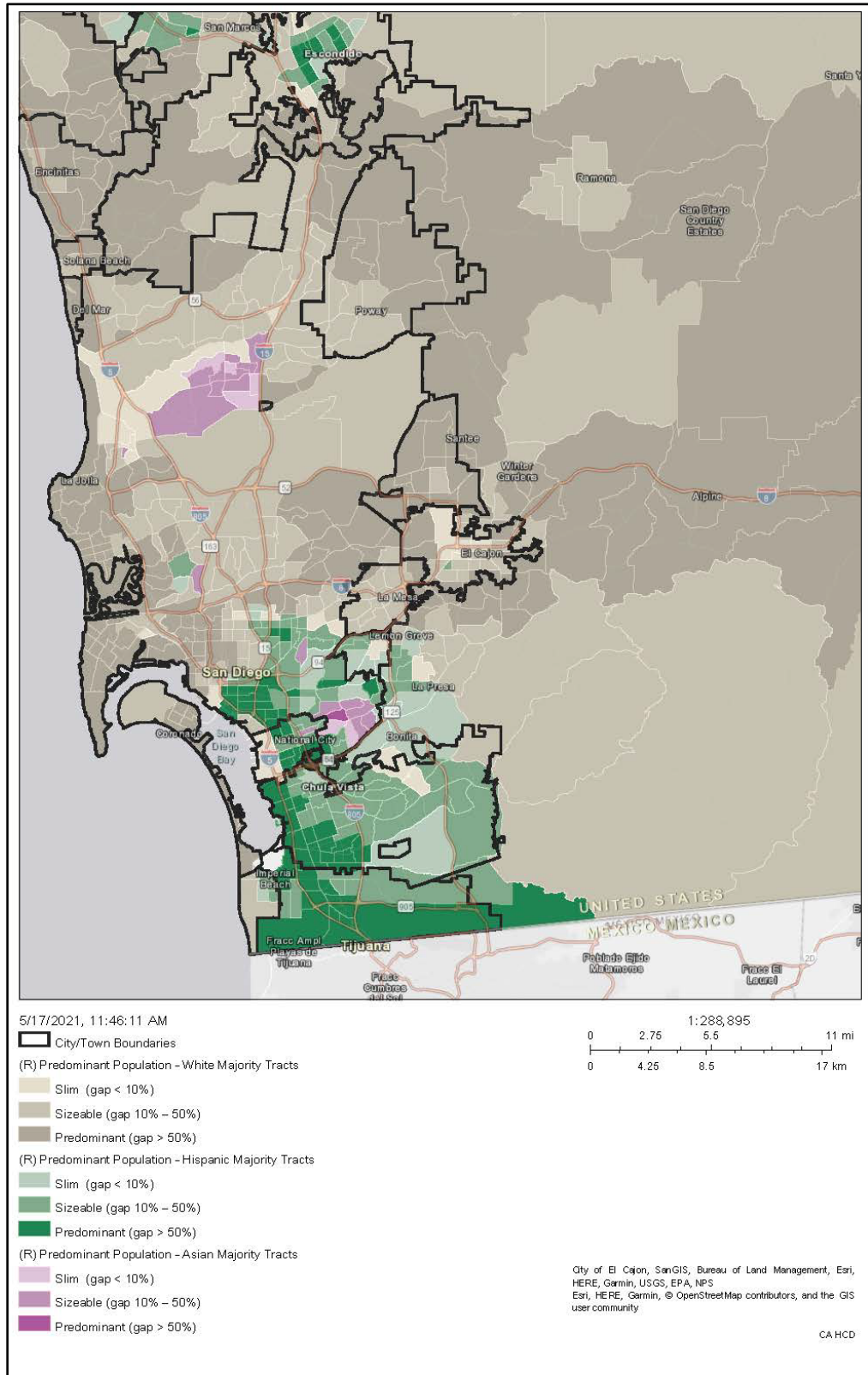
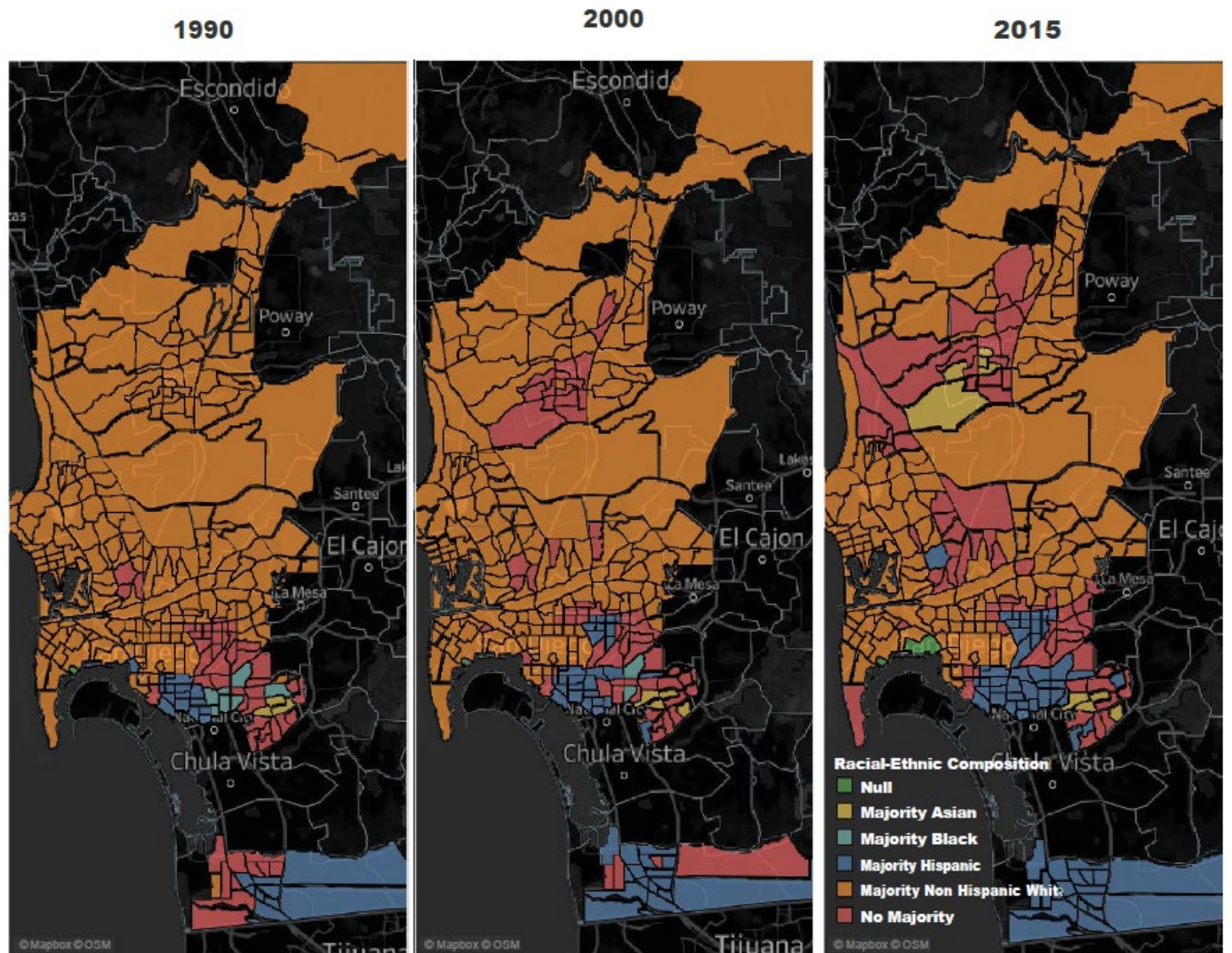


Figure A-5: Change in Racial/Ethnic Residential Composition 1990–2015 in the City of San Diego



Income

In regard to income, the SDAI states, “Household income is the most important factor determining a household’s ability to balance housing costs with other basic life necessities. Regular income is the means by which most individuals and families finance current consumption and make provision for the future through saving and investment. The level of cash income can be used as an indicator of the standard of living for most of the population. While economic factors that affect a household’s housing choice are not a fair housing issue *per se*, the relationships among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.”

“For purposes of most housing and community development activities, HUD has established four income categories based on the Area Median Income (AMI) for the Metropolitan Statistical Area (MSA). HUD income definitions differ from the State of California income definitions... Typically, HUD

defines a low- and moderate-income (LMI) area as a Census tract or block group where over 51 percent of the population is LMI.”

Table A-3: Income Categories (Captured from SDAI)

HUD Definition		State of California (HCD)	
Extremely Low Income	Less than 30% of AMI	Extremely Low Income	Less than 30% of AMI
Low Income	31-50% of AMI	Very Low Income	31-50% of AMI
Moderate Income	51-80% of AMI	Low Income	51-80% of AMI
Middle/Upper Income	Greater than 80% of AMI	Moderate Income	81-120% of AMI
		Above Moderate Income	Greater than 120% of AMI

Source: Department of Housing and Urban Development and California Department of Housing and Community Development, 2013.

Regional Patterns and Trends

The 2013-2017 ACS data shows that the median household income for San Diego County was \$70,588. Approximately 36 percent of the county's households earned less than \$50,000, nearly 30 percent earned between \$50,000 and \$99,999 and 35 percent earned more than \$100,000 between 2013 and 2017.

As illustrated in Figure A-6, the SDAI found that, “County-wide, LMI areas are concentrated in three very general areas. In the North County area, LMI areas are seen at Marine Corps Camp Pendleton and in the cities of Oceanside, Vista, San Marcos, and Escondido, in a pattern generally following State Route 78. In the southern portion of the county, clusters of LMI areas are seen in the central and southern areas of the City of San Diego and continuing down to the U.S./Mexico border. In the East County areas, there are vast LMI areas in sparsely populated parts of the unincorporated county and in the City of El Cajon.”

In regard to concentrations of poverty, the SDAI noted that, “Countywide, over 13 percent of residents (or 427,031 persons) were living below the poverty level (according to 2013-2017 ACS data).^{25F 26} Poverty was more prevalent for specific groups such as Hispanics 18.7 percent), Blacks (19.9 percent), and adults with less than a high school education (23.4 percent). In contrast, 12.6 percent of White residents, 10.3 percent of Asian residents, and five percent of residents with at least a bachelor's degree were living below the poverty level during the same time period.”

Figure A-7 shows “the geographic concentration of poverty in San Diego County (areas where the proportion of persons living in poverty is greater than countywide). According to the 2013-2017 ACS estimates, 13.3 percent of the population is living below the poverty line countywide. Similar to low- and moderate income areas, areas of poverty concentration are clustered in three general areas of the County. In North County, concentrations can be seen in the cities of Oceanside, San Marcos, Escondido, Carlsbad and Encinitas. In the southern portion of the county, concentrations can be seen in the central areas of the City of San Diego.”

“Increasing concentrations of low-income and poverty households are linked to racial and ethnic concentrations. In East County, poverty concentrations can be seen in many parts of the unincorporated county and in El Cajon. Many of the areas with a concentration of poverty in the western part of the county (in and around the incorporated cities) are also areas with minority

concentrations. In some areas such as La Jolla and San Marcos, the large student populations may contribute to poverty concentrations.”

Figure A-6: Low and Moderate Income Areas (Figure Captured from SDAI)

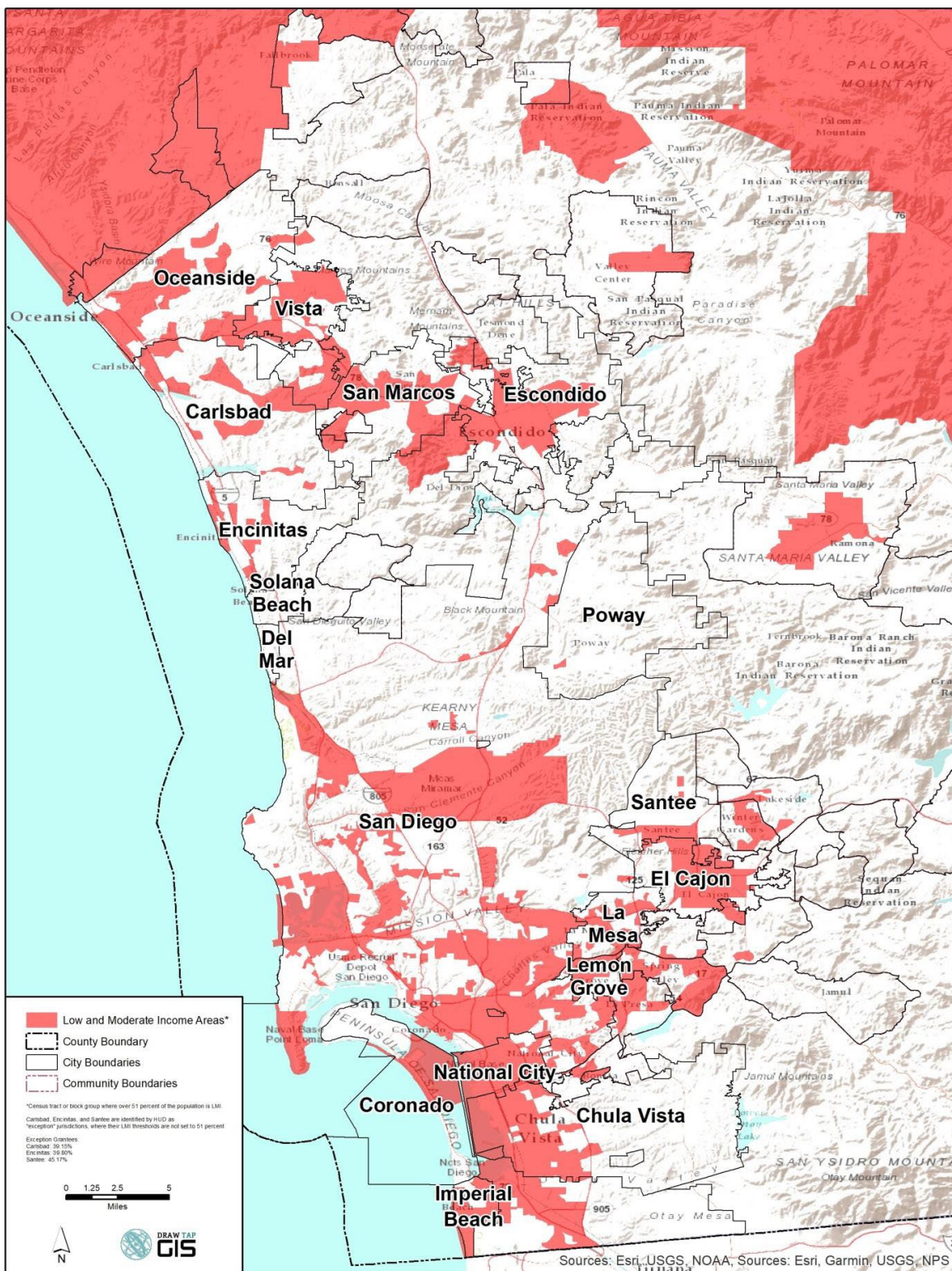
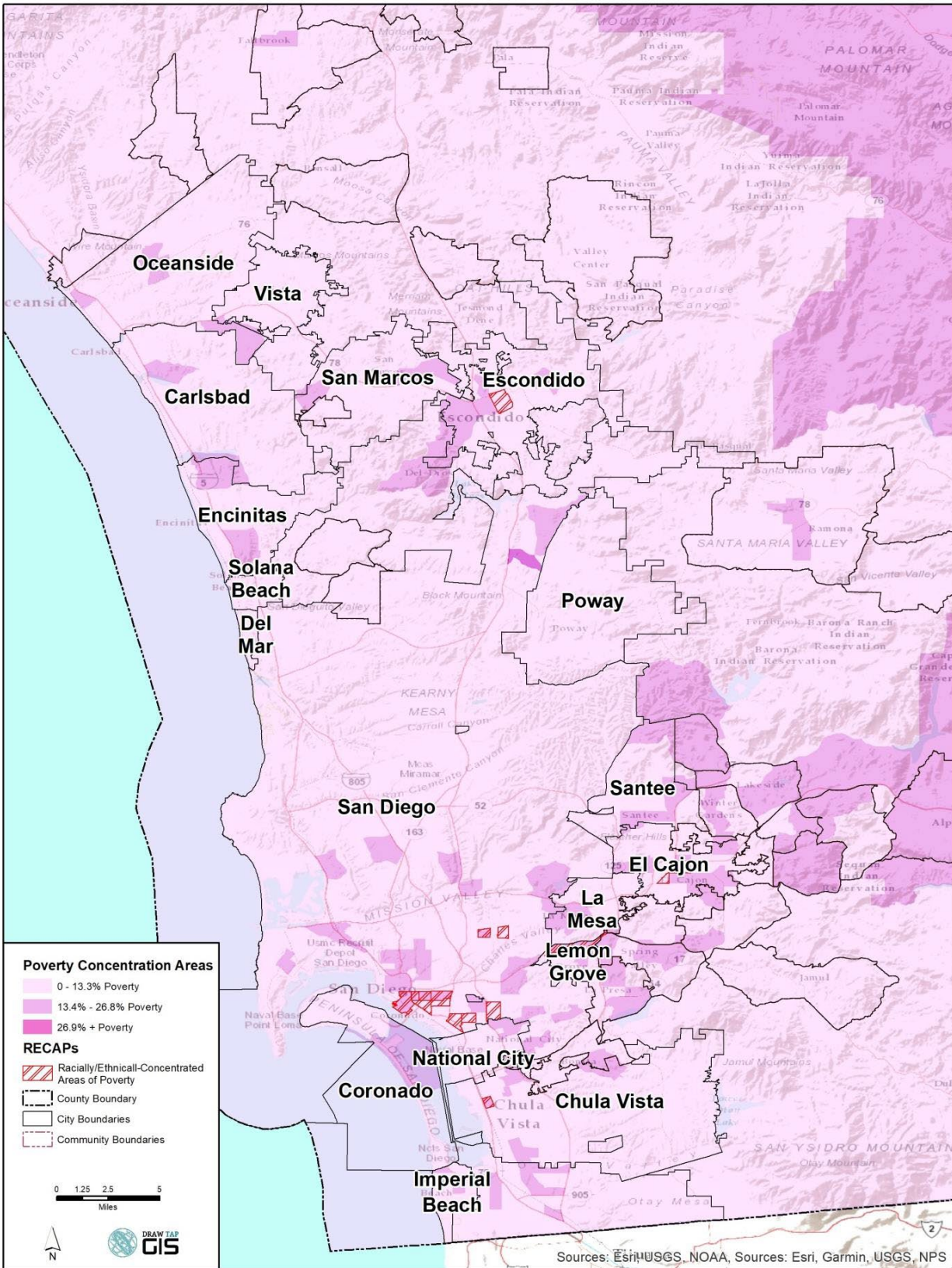


Figure A-7: Poverty Concentration Areas (Figure Captured from SDAI)

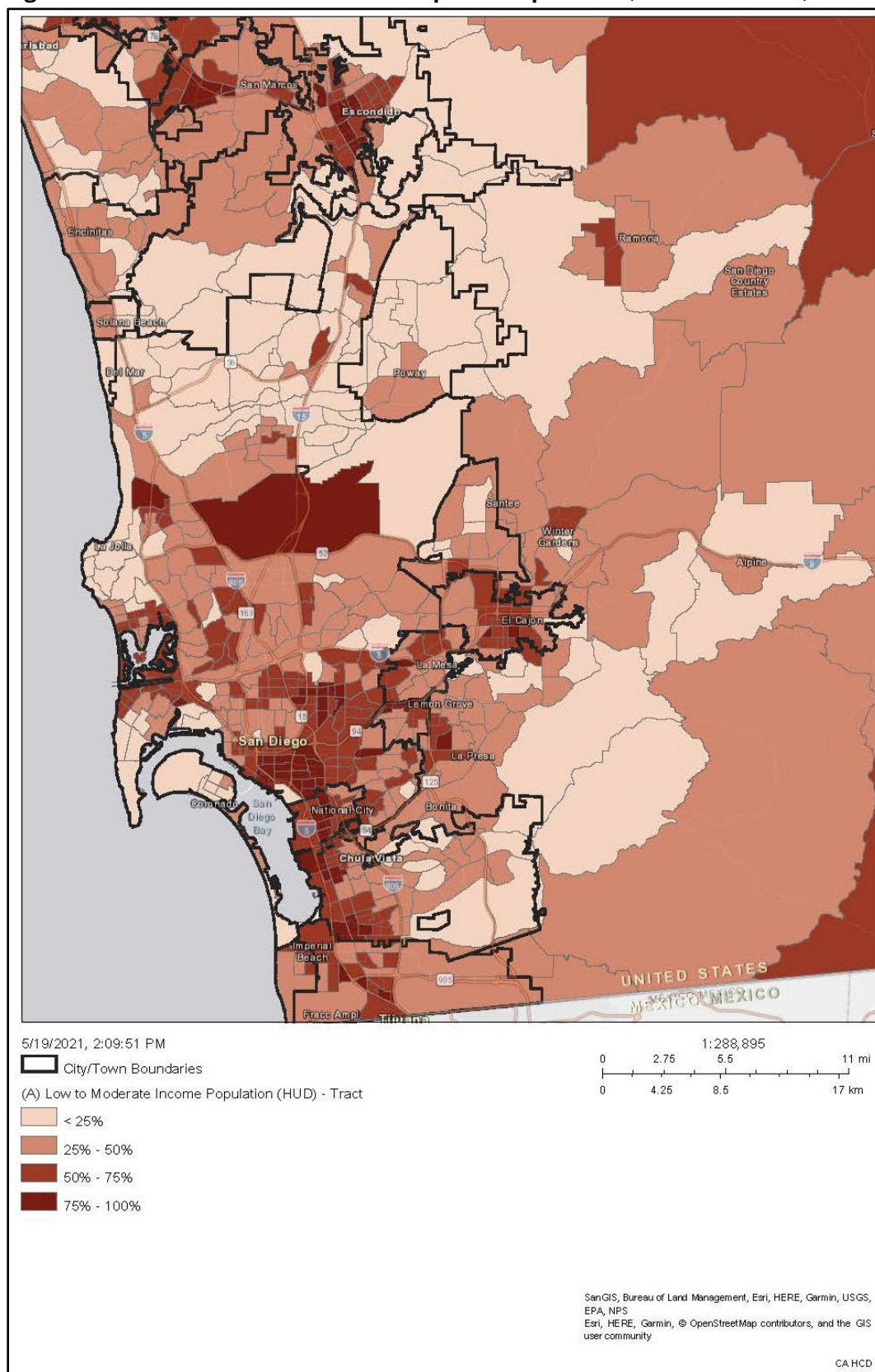


Local Patterns and Trends

An Extremely Low-Income household is defined as a household earning 30 percent or less of the median income; 30 percent of \$76,662 is \$22,999. In 2017, 15 percent of households in the City of San Diego, or 75,600, are estimated to earn less than \$25,000 annually. A conservative estimate of approximately 74,000 households are considered to be in the Extremely Low-Income category. These households tend to face a variety of housing challenges, including overcrowding and high housing cost burden, and they rely on numerous options for low-cost housing such as permanent supportive housing, transitional housing, and subsidized housing.

Figure A-8 shows the percentage of low and moderate income households (those earning less than 80% of the median income) in each of the census tracts. Coastal areas such as La Jolla and Point Loma, as well as the more recent suburban areas in the northern part of the City, have less than 25% of their populations comprised of low to moderate income households. Areas with 25% to 50% of their populations comprised of low to moderate income households include most of the central, non-coastal area of the City, with the exception of some beach communities such as Pacific Beach and Ocean Beach, which do have higher concentrations of low to moderate income households. Communities with the highest percentage of low to moderate income households are concentrated primarily south of the 94 freeway down to the border, as well as some locations around Interstate 8.

Figure A-8: Low to Moderate Income Population per HUD (AFFH Data Viewer)



Familial Status

As noted in the SDAI, “Different household types generally have different housing needs. Seniors or young adults typically constitute a majority of single-person households and tend to reside in apartment units, condominiums or smaller detached homes. Families, meanwhile, often prefer single-family homes. Household size can be an indicator of changes in population or use of housing. An increase in household size can indicate a greater number of large families or a trend toward overcrowded housing units. A decrease in household size, on the other hand, may reflect a greater number of senior or single-person households, or a decrease in family size.”

“Nationally, HUD data show that familial status discrimination ranks third in discrimination of protected classes, behind discrimination due to disability and race. While the language in federal law about familial status discrimination is clear, the guidelines landlords can use to establish occupancy can be very vague. Although landlords can create occupancy guidelines based on the physical limitations of the housing unit, landlords often impose strict occupancy limitations precluding large families with children.”

In looking at household composition, the SDAI noted that “Female single-parent family households are disproportionately affected by poverty... Limited household income constrains the ability of these households to afford adequate housing and childcare, health care, and other necessities. Finding adequate and affordable childcare is also a pressing issue for many families with children and single-parent households in particular.”

In regard to household size, the SDAI states that, “Large households are defined as those with five or more members. These households are usually families with two or more children or families with extended family members such as in-laws or grandparents. It can also include multiple families living in one housing unit in order to save on housing costs. Large households are a special needs group because the availability of adequately sized (i.e. three or more bedrooms), affordable housing units is often limited. Large households may face discrimination in the housing market, particularly for rental housing. Although landlords can create occupancy guidelines based on the physical limitations of the housing unit, landlords may impose strict occupancy limitations precluding large families with children.”

Regional Patterns and Trends

The SDAI found that “the majority [67%] of San Diego County households are family households, with a roughly even mix between married-couple households with and without children. Families with children account for 33.5 percent of all households in the county. “Other” families, primarily consisting of single-parent households, represent 17.2 percent of all households. Households of single senior persons make up 8.7 percent of all households. Between 2010 and 2013-2017, the distribution of household types remained relatively stable.”

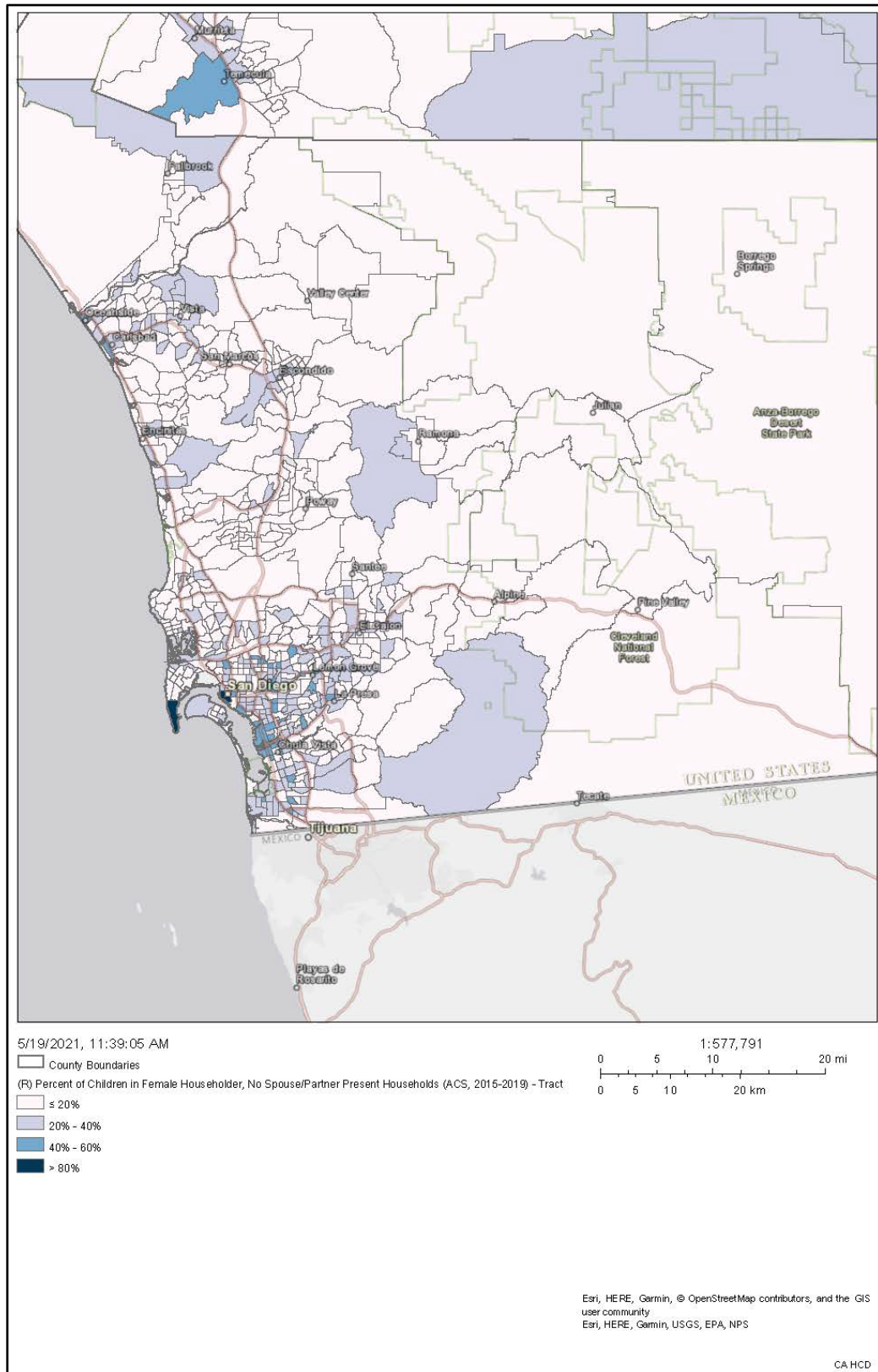
Female Single Parent Households

Figure A-9 illustrates the Percent of Children in Female Householder, No Spouse/Partner Present Households within the County of San Diego, based on data gathered for the American Community Survey. Areas shown in the lightest shade of blue (generally scattered throughout the county with

greater concentrations in the north and south) are those areas where 20-40% of the children live in female single-parent households, those shown in the medium shade blue (generally south of Interstate 8 in the older and more affordable areas of the City of San Diego) are areas where 40-60% of children live in female single-parent households, and those in the darkest shade of blue (a portion of downtown San Diego and Navy Base Point Loma) are areas where over 60% of children live in female single-parent households.

According to the SDAI, “the proportion of female-headed households decreased between 2010 and 2017 from 7.5 to 6.0 percent. The proportion of female-headed households with children was highest in El Cajon (20.7 percent) and National City (11.8 percent)... According to the 2013-2017 ACS, about 32.6 percent of female single-parent family households in San Diego County lived below the poverty level (compared to 9.5 percent of all family households in the county).”

Figure A-9. Percent of Children in Female Householder, No Spouse/Partner Present Households within the County of San Diego (AFFH Data Viewer)



Large Households

The SDAI found that “in 2017, close to 12 percent of all households in the county had five or more members; specifically, 10.9 percent of owner-households and 12.5 percent of renter-households in the county were large households. This represents a decrease of two percentage points in the proportion of large households in the county between 2010 and 2017 from 13.7 to 11.7 percent. The proportion of large households was highest in the cities of National City (19.0 percent), Escondido (18.6 percent), and Chula Vista (18.0 percent), although their respective proportions in 2010 were much higher at, 25.4m 20.7, and 20.5 percent. These three cities also had high proportions of non-White population (90.3, 63.5, and 82.3 percent, respectively) and family households (74.3, 72.7, and 79.0 percent, respectively) in 2017. Many ethnic minority groups have a younger age profile and tend to have larger families than the White population. The 2012-2016 CHAS data shows that over half (51.3 percent) of large households were estimated to earn low and moderate incomes compared with 45.6 percent of all county households.” Table A-4 illustrates the percentage of large households in the City of San Diego in relation to the county as a whole and the State of California.

Table A-4: Large Households in the City and County of San Diego*

City/Area	Total Large Households		Large Owner Households		Large Renter Households	
	#	% of Total Households	#	% of Total Households	#	% of Total Households
City of San Diego	49,569	10.0%	22,901	9.8%	26,668	10.1%
Total County	129,627	11.7%	64,409	10.9%	65,218	12.5%

*Excerpted from Table 19, *San Diego Regional Analysis of Impediments to Fair Housing Choice*, August 2020

Figure A-10 provides a map illustrating average household size per census tract throughout the county. Household size is mapped as 0-2, 2-3, 3-4 or greater than 4 people. The last of these, shown in dark teal, represents large households of 5 or more persons. Consistent with the findings of the SDAI, census tracts with an average of 5 or more people can be found in the north county cities of Oceanside, Vista San Marcos, and Escondido, and in the southern part of the county in the cities of National City and Chula Vista.

May 19, 2021

AverageHouseholdSize

- 0-2 People
- 2-3 People
- 3-4 People
- >4 People

0 4.75 9.5 19 mi

0 5 10 20 km

1671,940

Sources: Cal, HESR, Census, USGS, Marmot, INCORPORATE P, NCEM, Cal, Japan, MCT, CalChico (Hemp Kemp), Cal Katoe, Cal (Holland), MDC, (G) Open StreetMap contributors, the GPUSum Community

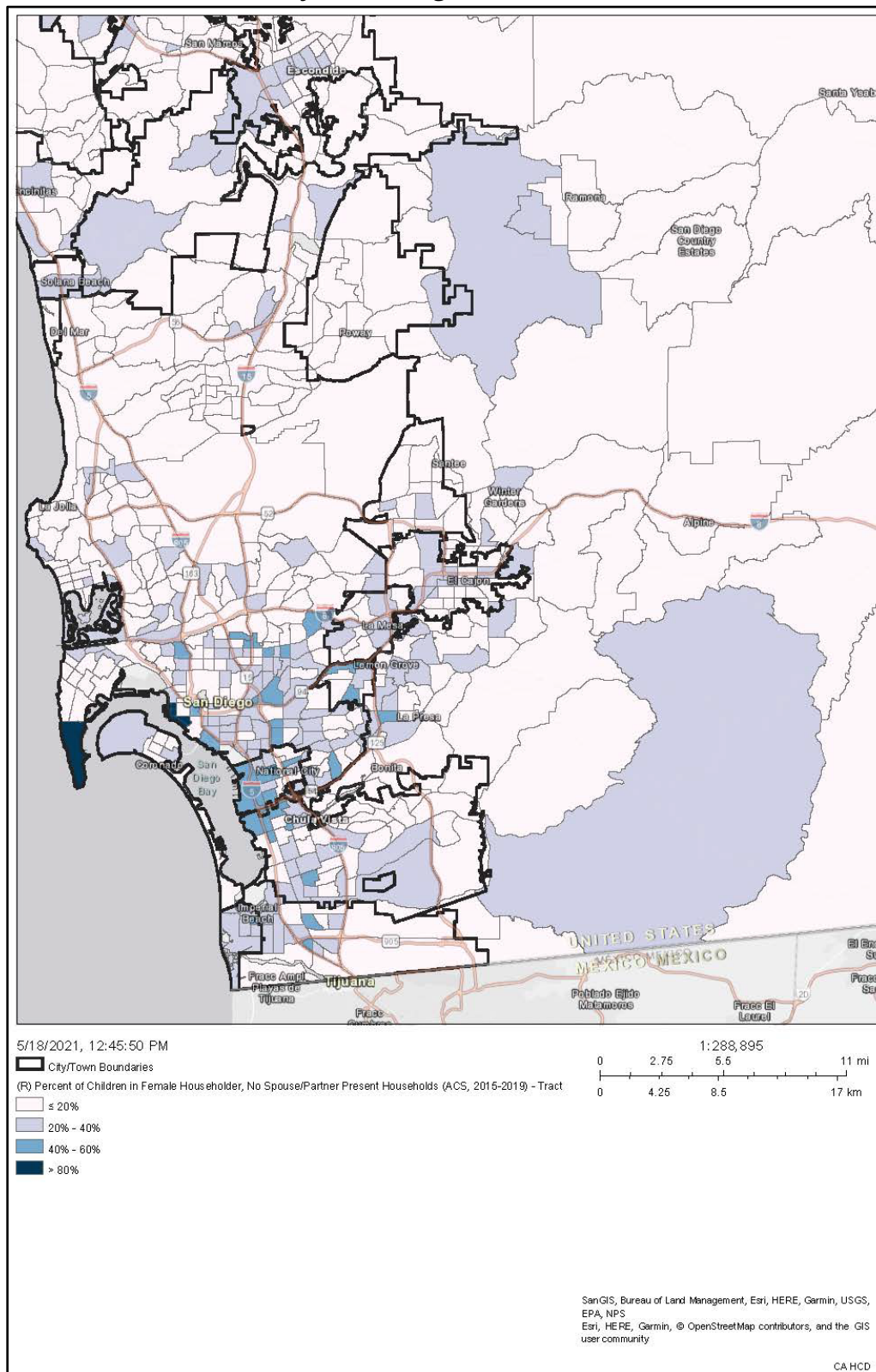
Local Patterns and Trends

According to the ACS, between 2012-2017 total households in the City grew approximately 6 percent. The largest increase in household type was 14 percent with Non-Family Households where the householder does not live alone. This illustrates an increase in households with roommates. In 2017, two-person households made up the largest proportion of households in the City of San Diego at 34%.

Female Single Parent Households

Per the ACS, as of 2017, single-parent households made up 22 percent of all City households, and women were the head of about 83 percent of all single parent households. Figure A-11 illustrates the Percent of Children in Female Householder, No Spouse/Partner Present Households within the City of San Diego, based on data gathered for the American Community Survey. Areas shown in the lightest shade of blue (generally scattered throughout the city with greater concentrations in the south and less concentration to the northeast) are those areas where 20-40% of the children live in female single-parent households, those shown in the medium shade blue (generally south of Interstate 8 in the older and more affordable areas of the City of San Diego) are areas where 40-60% of children live in female single-parent households, and those in the darkest shade of blue (a portion of downtown and Navy Base Point Loma) are areas where over 60% of children live in female single-parent households.

Figure A-11. Percent of Children in Female Householder, No Spouse/Partner Present Households within the City of San Diego (AFFH Data Viewer)

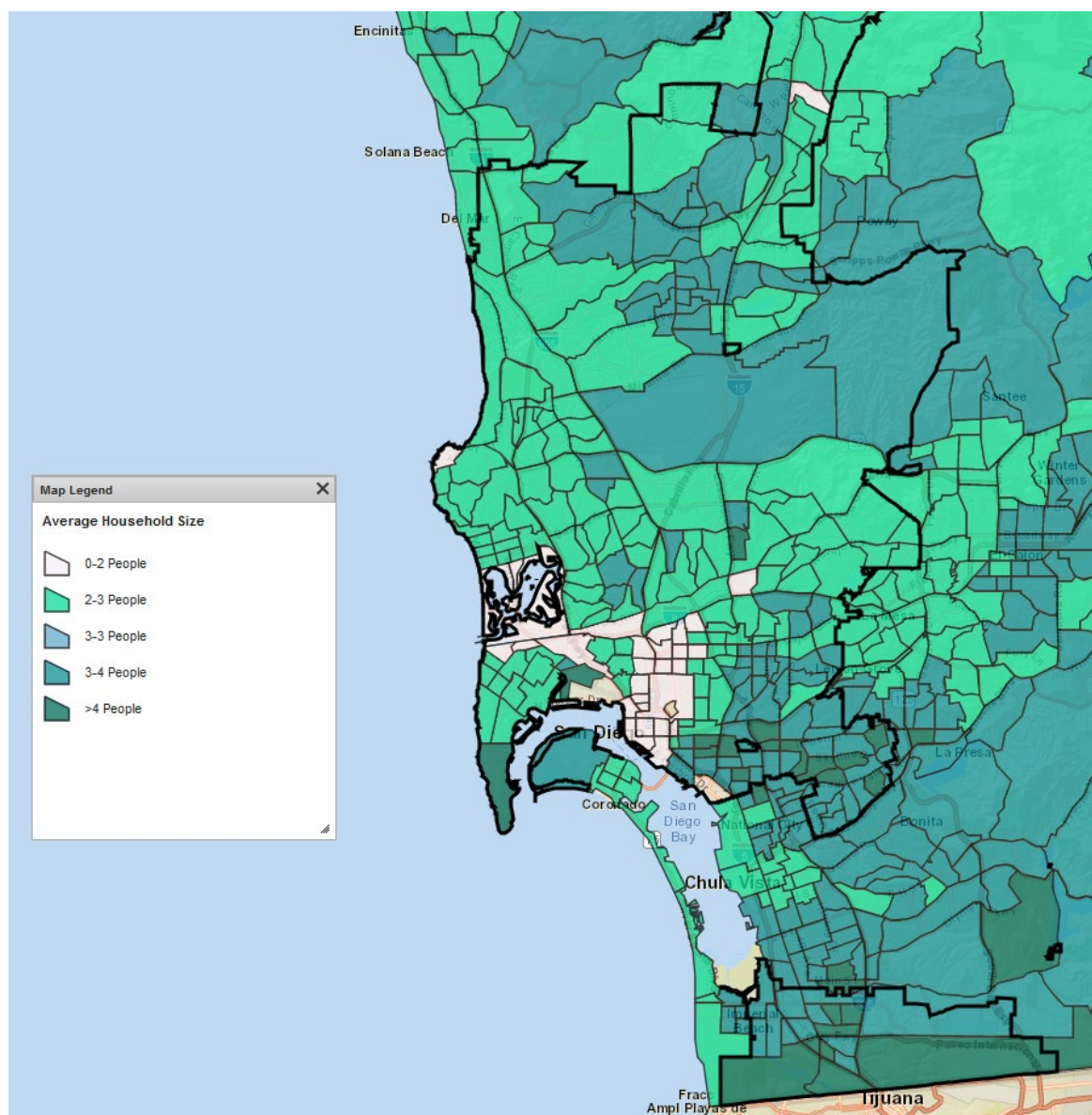


Large Households

As of the 2013-2017 ACS, nearly one-quarter (23%) of all households in the City of San Diego were comprised of four or more persons. In 2017, large households of 5 or more persons accounted for 10.5% of all households, with the vast majority of large households being family, rather than non-family households.

Figure A-12 provides a map illustrating average household size per census tract throughout the county, including the City of San Diego. Areas shown in dark teal represent large households of 5 or more persons. Census tracts with an average of 5 or more people can be found in the communities south of the 94 freeway and in the border communities of San Ysidro and Otay Mesa, which also have higher concentrations of minority and lower income households.

Figure A-12. Average Household Size, City of San Diego (HUD CPD Maps)



Persons with Disabilities

The SDAI states that, “Federal laws define a person with a disability as any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment. In general, a physical or mental impairment includes hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and [developmental disabilities] that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself.”

The SDAI goes on to state that, “Persons with physical disabilities may face discrimination in the housing market because of the use of wheelchairs, need for home modifications to improve accessibility, or other forms of assistance... While housing discrimination is not covered by the ADA, the Fair Housing Act prohibits housing discrimination against persons with disabilities. In their 2019 Fair Housing Trends Report, the National Fair Housing Alliance indicated that disability complaints were the most prevalent type of housing discrimination complaint (56.3 percent).”

Regional Patterns and Trends

The SDAI found that, “According to 2013-2017 ACS data, 312,565 persons living in San Diego County had a range of disabilities, comprising 9.8 percent of the population. The largest age group of persons with disabilities were seniors, comprising 45.9 percent of the population with disabilities, followed by adults (ages 18 to 64) which comprised 47.1 percent of the population. Children under the age of 18 made up about seven percent of the population with disabilities. The cities of El Cajon, La Mesa, and Lemon Grove had the highest proportion of residents with disabilities (13.3, 12.6, and 11.9 percent).

Data collected for the SDAI illustrated in Figure A-13 shows that “although disabled persons are geographically dispersed throughout the more urbanized areas of the county, there are significant areas with a high density of disabled residents that coincide with minority concentration areas and RECAPs (Racially Concentrated Areas of Poverty). Specifically, concentrations of disabled residents can be seen in the North County cities of Oceanside, Vista, San Marcos, and Escondido, as well as the southern areas of the City of San Diego and southern cities near the U.S/Mexico border. Due to the presence of residential care facilities, the City of San Diego and the cities of El Cajon, La Mesa, and Lemon Grove also have concentrations of residents with disabilities. The coastal and inland areas show less dense concentrations of residents with disabilities, which could be due to the high price of housing (in the coastal areas) or the scarcity of facilities and services for persons with disabilities (inland areas).”

Figure A-13: Persons with Disabilities County-Wide (Figure Captured from SDAI)

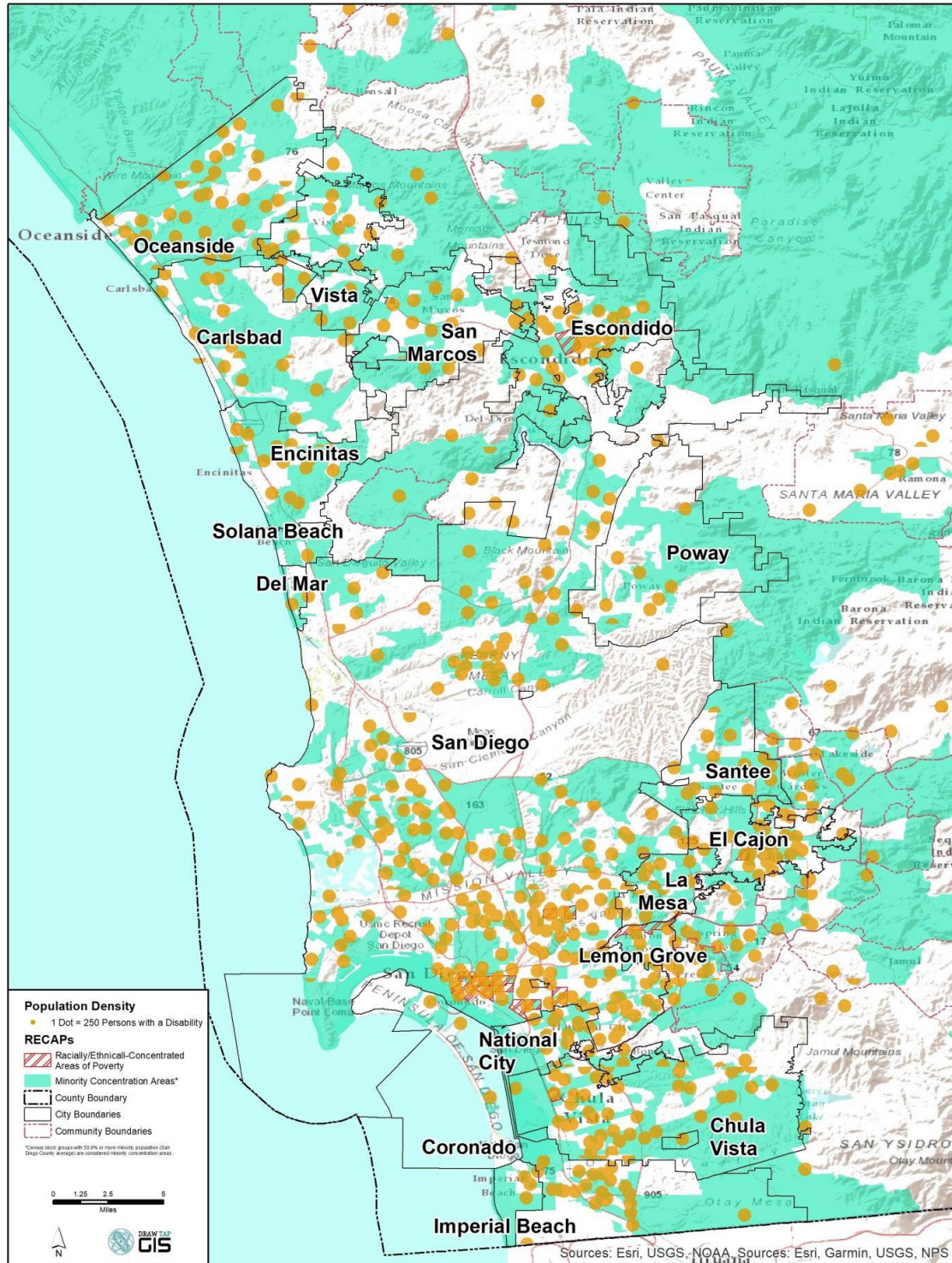
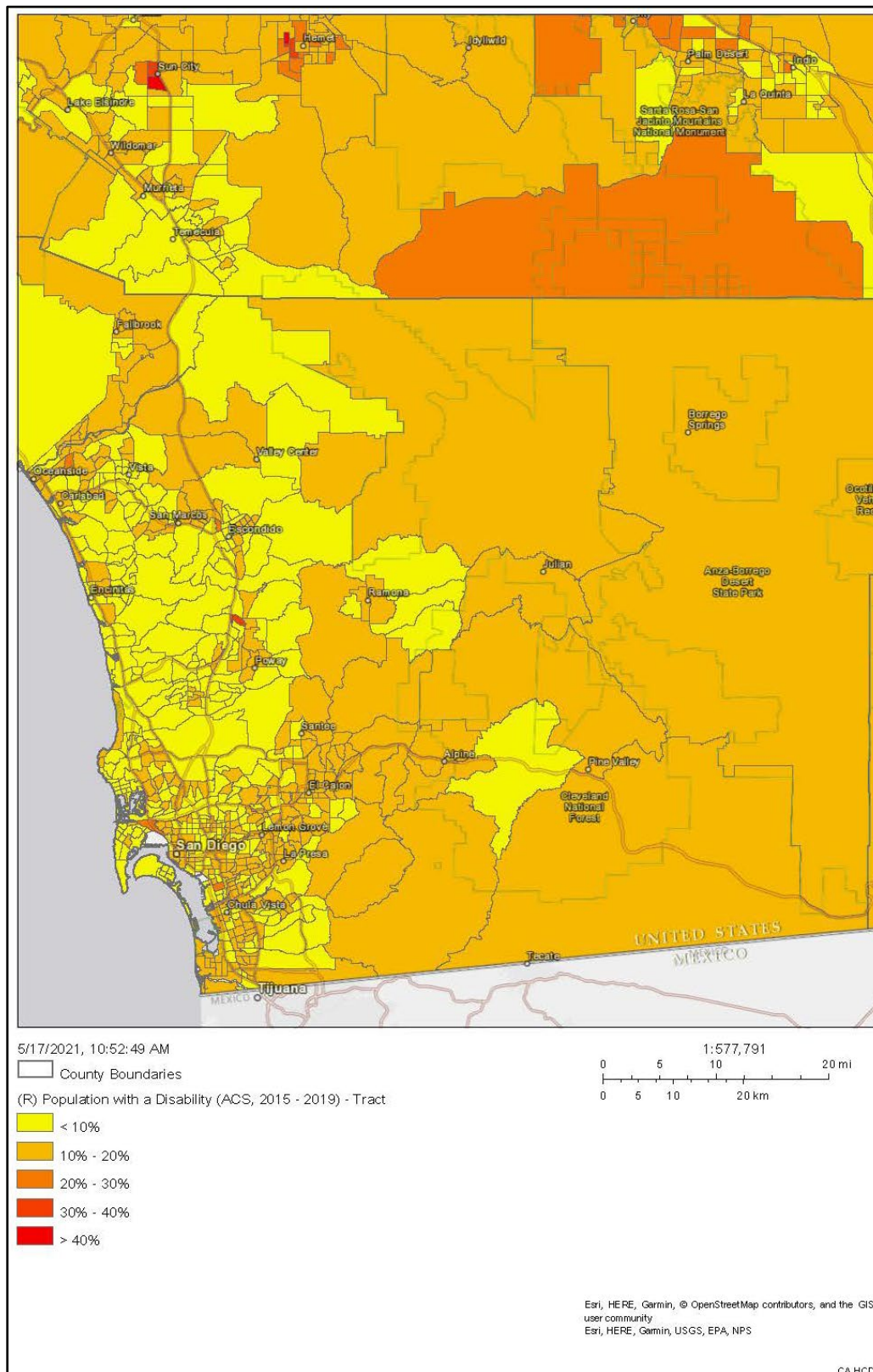


Figure A-14. Distribution of Persons with Disabilities in the County of San Diego (AFFH Data Viewer)



Local Patterns and Trends

As shown in Table A-5, 8.9% of the City's population is comprised of individuals with a disability. Of the estimated 122,831 individuals with disabilities in the City, 44.42% are over the age of 65, 47.43% are ages 18 to 64, and 8.14% are under the age of 18. Among those under age 64, the largest proportion of disabilities is cognitive. Most of those aged 65 and older have an ambulatory disability.

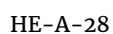
Table A-5. City of San Diego Persons with Disabilities by Type (2017)

Disability Type	Number	Percent
Total population	1,383,566	
<i>Total population with a disability</i>	122,831	8.9%
Population under 18 years old	282,369	
<i>Population with a disability under 18 years old</i>	10,000	3.5%
Hearing	1,913	0.7%
Vision	2,3834	0.8%
Cognitive	7,079	2.5%
Ambulatory	1,572	0.6%
Self-care	2,486	0.9%
Independent Living	20,413	2.2%
Population 18 to 64 years old	926,542	
<i>Population with a disability 18 to 64 years old</i>	58,264	31.2%
Hearing	9,734	1.1%
Vision	12,332	1.3%
Cognitive	25,188	2.7%
Ambulatory	25,168	2.7%
Self-care	9,517	1.0%
Independent Living	20,413	2.2%
Population over 65 years old	174,655	
<i>Population with a disability over 65 years old</i>	54,567	31.2%
Hearing	22,435	13%
Vision	9,404	5%
Cognitive	15,673	9%
Ambulatory	33,570	19%
Self-care	14,452	8%
Independent Living	25,429	15%
Source: U.S. Census Bureau, American Community Survey 2017		

As shown in Figure A-15, within the City of San Diego, persons with disabilities are generally distributed throughout the City, with greater concentrations in some areas including Rancho Bernardo, which larger Senior (55+) communities; as well as Midway-Pacific Highway and western Old Town along Interstate I-5, which is home to several senior and affordable housing developments.

To assess living patterns among city residents with disabilities, the data on persons with disabilities has been separated between disabled persons who are non-elderly (less than 65 years of age) and

Figure A-15. Distribution of Persons with Disabilities in the City of San Diego (*AFFH Data Viewer*)



Percentage of the Disabled Population that is NOT Elderly (+65 years)

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- 80% - 100%

Other Map Layers

- Military Use
- Community Planning Areas

Percentage of the Disabled Population that is Elderly (+65 years)

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- 80% - 100%

Other Map Layers

- Military Use
- Community Planning Areas

Median Income (Block Group) - ACS (2015-2019)

- < \$30,000
- < \$55,000
- < \$87,100 (HCD 2020 State Median Income)
- < \$125,000
- Greater than \$125,000

Other Map Layers

- Military Use
- Community Planning Areas

LOCAL DATA AND KNOWLEDGE

Preparation of the San Diego Regional Analysis of Impediments to Fair Housing Choice and the City's 2021-2029 Housing Element provided opportunities to hear directly from various stakeholders regarding housing and fair housing choice. These stakeholders included housing professionals, service providers, affordable housing advocates, and general members of the public.

During preparation of the SDAI, stakeholders identified several key issues related to fair housing choice, including experiences with housing discrimination and issues reporting it, barriers to housing in the community, identifying protected classes that need improved services, and misconceptions/misunderstandings about fair housing and ways to build community awareness. Stakeholders reported experiences of housing discrimination on the basis of homelessness, sexual orientation, use of an emotional support animal, families with a deported parent, female households with adopted children, families with children with autism, and source of income or type of work. Stakeholders shared that such housing discrimination is often underreported due to the burden of proof resting with the individual who has been discriminated against; cost and length of time associated with possible litigation; and fear of retaliation, harassment, or deportation as a result of reporting.

Regarding barriers to housing, stakeholders shared that many people have difficulty finding and accessing information about fair housing for a variety of reasons, including knowing where to go to get the information, lack of access to digital resources, cultural barriers, language barriers, and limited education. Additionally, stakeholders reported that the information that was provided was often confusing and noted the shortage of affordable units and the long waiting list for Section 8 vouchers. As to protected classes that need improved services, stakeholders identified seniors, individuals with mental and physical disabilities, victims of domestic violence, and immigrants.

When addressing misconceptions/misunderstandings about fair housing, stakeholders again noted confusion regarding requirements and personal rights, such as what qualifies as a reasonable accommodation for a disability. Stakeholders also identified possible ways to increase awareness about fair housing, including simplifying language and documents/applications; relating messaging to people's lives and experiences; providing agency representatives that can communicate in the different languages spoken in the community; providing information directly at local community gathering places and organizations; partnering with other organizations including cultural and faith-based groups to share information; and expand how information can be seen and heard.

During outreach for the 2021-2029 Housing Element, city staff received more than 1,100 comments, had 464 online survey participants, and engaged in-person with nearly 200 San Diegans. Most San Diegans agree that housing affordability and homelessness are urgent concerns that need to be addressed and that a top strategy to solving these issues is improvements to City processes to increase the overall supply of housing, although some respondents expressed concern over impacts of additional housing on things such as parking and water supply.

Below is a summary of some of the questions asked in the online survey and the top two responses to those questions:

- “What is the biggest barrier to affordable housing is in the City of San Diego?” (Table F-1)
 - “Cost of quality housing is too high” (33%) and “Low supply of housing” (20%).
- “What is the most urgent housing issue?” (Table F-2)
 - “Affordability” (47%) and “Homelessness” (20%).
- “What is the best way to address seniors’ housing and living needs?” (Table F-5)
 - “Offer more rent-restricted, affordable senior housing” (26%) and “Support construction of more retirement communities” (16%).
- “What is the most urgent homeownership issue?” (Table F-7)
 - “Available homes in my price range” (38%) and “Overall costs” (32%).
- “What is the most pressing issue to finding quality housing in San Diego?” (Table F-9)
 - “Only low-quality housing available in my price range” (38%) and “Low availability of housing where I want to live” (29%).
- “Which is the most pressing displacement concern?” (Table F-11)
 - “Sudden rent increase” (51%) and “Long-term residents can’t stay in community” (22%).
- “What do you think is the best strategy to produce more housing?” (Table F-13)
 - “Improve City processes” (28%) and “Increase housing supply near transit” (22%).

When provided an opportunity to provide additional, open-ended responses to issues surrounding access to fair housing, stakeholders provided responses that included requiring developers to construct affordable housing on-site rather than pay in-lieu fees; limiting or eliminating short-term vacation rentals to free-up housing stock; improving City permitting processes and reducing fees; the impact of sharp rent increases; encouraging small-lot development and tiny homes; facilitating aging in-place; the need to construct new housing near transit; and implementation of rent control. Other stakeholders, presumably those not directly impacted by limited access to fair housing choice, expressed concern regarding impacts to the environment, traffic, and “quality of life” resulting from the construction of additional housing units.

OTHER RELEVANT FACTORS

Several intersecting and overlapping factors have impacted patterns of segregation and integration over the course of the City’s history. These factors include White flight; housing costs; access to well-paying jobs and economic mobility; racially and economically restrictive covenants within real estate deeds; redlining; discriminatory real estate practices; zoning; freeway construction; ballot initiatives; and public resistance to increased housing and density. To understand how these factors have shaped the city and its segregation and integration patterns, a high-level overview of the historical development of the City of San Diego is provided. This overview is gathered primarily from thematic

and community-based historic context statements prepared for the City of San Diego Planning Department, including those for Old Town, Southeastern San Diego and Encanto, San Ysidro, North Park, Uptown, and Golden Hill, as well as the Downtown African American Historic Context Statement and the Asian Pacific Thematic Historic District Master Plan. Where other sources are utilized, they are referenced.

In 1769 a Spanish land expedition led by Gaspar de Portola reached San Diego Bay and initially made camp on the shore in the area that is now downtown San Diego. However, lack of water at this location led to moving the camp to a small hill closer to the San Diego River near the Kumeyaay village of Cosoy. The Spanish built a primitive mission and presidio structure on the hill near the river. In 1774, the Spanish missionaries moved the Mission San Diego de Alcalá to its present location six miles up the San Diego River Valley. The mission system had a significant effect on all Native American groups from the coast to the inland areas and was a dominant force in San Diego County.

Individuals from a diversity of ethnic and racial backgrounds were participants in the earliest days of Spanish colonialism in southern Alta California. Spain itself was, at the time of its colonial expansion, not long out of the seven centuries of cultural and demographic mixing under the rule of the north African Moors. By the time of the development of Spanish colonial settlements in California, there had been more than seven generations of racial and ethnic blending. The complexities of definitions of identity in Spain and its New World colonies are clear in the 1790 census of the Presidio de San Diego. Of the 90 adults at the presidio, at least 45 were noted as being one or more race or ethnicity. The categories listed included *mulatto* and *colores quebrado* (both groups recognized as persons of African ancestry in the complicated Spanish colonial identity system), as well as other labels indicating some portion of African heritage. Originating from Cuba, the West Indies, and Africa, these individuals played a significant role in the settlement and colonization of southern California. Processes of intermarriage between Native Americans, Spanish, and those of African descent precluded the creation of a separate Afro-Spanish identity in early Spanish and Mexican California.

In 1822, Mexico won its independence from Spain and San Diego became part of the Mexican Republic, which began issuing large private land grants in the early 1820s. As early as 1791, presidio commandants in California were given the authority to grant small house lots and garden plots to soldiers and their families. By 1827, as many as 30 homes existed around the central plaza of what is now Old Town San Diego. In 1834 the Mexican government secularized the San Diego and San Luis Rey missions and in 1835 Mexico granted San Diego official pueblo status. The new Pueblo of San Diego did not prosper, as did some other California towns during the Mexican Period. Shortly after the secularization, continued displacement and acculturation of Native Americans led to increased resistance against the Californios in the late 1830s. Attacks on outlying ranchos, along with unstable political and economic factors contributed to San Diego's population decline. In 1838, San Diego's official pueblo status was removed, and it became a sub-prefecture of the Los Angeles Pueblo. By 1840, San Diego had an approximate population of 150 permanent residents, down from a high of 600 just five years earlier.

American military forces raised the United States flag in San Diego in 1846 and assumed formal control with the Treaty of Guadalupe-Hidalgo in 1848. In the quarter of a century that followed, San Diego was transformed from a Hispanic community into a primarily Anglo-American one. On February

18, 1850 the California State Legislature formally organized San Diego County, and California was granted U.S. statehood just seven months later on September 9th. At its incorporation, the San Diego County census records only eight African Americans in a total population of 798 individuals. This no doubt represents an under reporting given the tendency of African-Hispanics to be listed as White or as Mexican rather than as Black. In the decade that followed San Diego grew slowly. San Diegans attempted to develop the town's interests by attracting a transcontinental railroad and the development of a new town closer to the bay in response to the California Gold Rush.

The real urbanization of the city as it is today began in 1869 when Alonzo Horton moved the center of commerce and government from Old Town to New Town (now Downtown San Diego). The new location was more accessible to the bay, which facilitated the development of commerce. Chinese Immigrants established a fishing colony along the edge of the bay and laborers, farmers, shop owners and others soon followed. 1868 and 1869 were boom years, with steady growth over the next four years until the economic panic of 1873. The population dropped to 1,500 in 1875, but then rebounded as San Diego's civic leaders continued to focus on the development of the railroad.

By 1876 both San Francisco and Los Angeles had direct rail links to the East Coast, and for San Diego to establish itself as one of California's top destinations it needed one as well. Chinese laborers flooded San Diego during the construction of the California Southern Railroad, and the population of the Chinese Quarter rose to almost 1,000 in 1882. Chinese settlement at the end of the 19th century was located primarily in the area bounded by Second Avenue, Sixth Avenue, "E" Street and "K" Street. Anti-Chinese sentiment swept through the state in the 1880's, leading to the Chinese Exclusion Acts of 1882, 1888, and 1892, which prohibited further immigration and forbade Chinese residents from owning property or becoming citizens. These laws had a great impact on San Diego's Chinese population, which dropped to 300 by 1883.

In these post-Civil War years, freemen and Blacks recently freed from the shackles of slavery came to San Diego for the same reasons others did, to start a new life, to find economic gain, and, although not always realized, to experience the relative freedom and opportunity offered by the western frontier when compared to the South. As a result, Black settlers and émigrés in this period came largely from the South and settled throughout San Diego County. It has been suggested that the rural back country was an attraction to Black pioneers because of the availability of cheap land and the sparse population. Rural areas also offered a degree of isolation and anonymity not available in urban areas. Regionally, post-Civil War migration of all ethnic groups, including African Americans, was still felt most strongly in Northern California.

Once a transcontinental line had been established at the end of 1885, trade increased, and San Diego's population boomed to 40,000 in 1887. This expansion in trade brought an increase in the availability of building materials. Wood buildings gradually began to replace adobe structures. The 1890 federal census of San Diego listed at least 289 persons as "Colored" or "Negro," sixty-three of whom resided in downtown San Diego. Of these directory listings, the concentration of the African American population was located between Ash and Market, down to and bounded on the east by 8th Avenue and on the west by State Street. Cheap labor, both skilled and unskilled, had been a problem in San Diego going back to the 1850s. Native American labor filled a large part of the labor needs but by the 1880s the majority of the Kumeyaay Indians had been placed on reservations in relatively remote

portions of the county. Blacks filled some of the void and they brought a variety of skills to the labor force. Despite the growing prosperity of the city, San Diego's boom quickly went bust in the 1890s as a general depression hit the U.S. In the decade that followed San Diego's population decreased by half.

At the turn of the 20th century, the City's population remained clustered downtown and in the newly developed communities to the immediate north, east and southeast, which are the City's earliest first-ring suburbs. These include the southern end of Uptown (referred to as "Banker's Hill") to the north; Golden Hill and the East Village area of Downtown to the east; and portions of Southeastern San Diego (primarily Sherman Heights, Grant Hill, and Logan Heights) and Barrio Logan to the southeast. Portions of all of these early suburbs featured grand homes of the City's elite, but also included middle- and working-class homes as well. The community of Encanto, which sits to the east of Southeastern San Diego, was outside the boundary of the City at the early 20th century and was subdivided and sold in one-acre "small farm" plots.

The 1910 federal census reveals that 97 percent of the City's population of 39,578 was either native or foreign-born White. The census data does not indicate what percentage of those listed as native or foreign-born White were Hispanic. The remaining 3 percent of the population was listed as "Negro" (1.5 percent) and "Indian, Chinese, Japanese, and All Other" (1.5 percent). Around this time, the city's Mexican American community was scattered through downtown, the harbor, and present-day northwestern Barrio Logan. The Asian American community, which by this time also included Japanese merchants and fisherman, remained concentrated in the downtown area and grew to include additional blocks to the north and east. For many African Americans in this era, Front and F was the "residential area within the downtown sector." However, with improvement in their economic status during the 1890s, some African Americans began outward settlement from the downtown area to the east and to "more expensive urban neighborhoods" like Logan Heights in present-day Southeastern San Diego. In the early years of the community, the ethnic composition of Southeastern San Diego was typical of other neighborhoods, with minorities scattered throughout a predominantly White community. According to a 1982 article about the history of Logan Heights, "Both blacks and Mexican-Americans had lived in the area as early as the 1890s, but they attracted little notice; their numbers were small in relation to other neighborhood residents, and other parts of San Diego—particularly the central area—offered greater concentrations of these minority groups."

Beginning in the 1920s, ethnic enclaves began to form in the Southeastern San Diego community, especially in the greater Logan Heights area and Encanto, and in the adjacent community of Barrio Logan. As community member Evelyn Mitchell remembered, "Barrio Logan was a very diverse community in the past with Japanese, Italians, Syrians, and Mexicans living together". There are various theories about what caused the change in the ethnic composition, but most scholars attribute it primarily to the increased use of restrictive covenants in housing contracts in other neighborhoods of San Diego. These covenants targeted all minorities, but were especially discriminatory against African Americans, Mexican Americans, and Asians, so these groups settled in the older communities of Southeastern San Diego and Barrio Logan where such restrictions were absent or were not enforced. Other factors that caused an influx of minority residents likely included proximity to bayfront and railroad jobs as well as social institutions such as churches, desire for cultural familiarity amongst others of the same culture, and international events that triggered large-scale population

migrations across the country. Additionally, as the automobile opened new lands for settlement, wealthier White residents who had once lived in the neighborhoods close to the downtown commercial core took the opportunity to move further afield beginning in the 1920s, leaving vacancies for minority groups in the inner city.

The use of racially restrictive covenants was common throughout the State of California and across the country in the late 19th and early 20th centuries and were found in many deeds in San Diego from roughly 1910 until they were ruled unenforceable by the Supreme Court in 1948. Not only did covenants prohibit the sale of property to anyone other than someone of the “Caucasian race” (the language seen most frequently), but they also included minimum valuations for improvements to the property, which precluded lower income individuals and families from purchasing a lot and improving it. Areas subdivided and sold during the 19-teens through the 1940s often included such restrictions, unless they were within or adjacent to areas already occupied by people of color. The areas of the city developed prior to the 19-teens, which generally did not have racial covenants, provided opportunities for homeownership for San Diego’s minority communities who were excluded from the newer neighborhoods that White residents and property owners were relocating to.

In 1923 San Diego adopted its first zoning ordinance, establishing five different zone types (Ordinance 8924). Zone “A” was reserved for exclusively single-family residential uses; Zone “B” allowed for multi-family residential uses, hotels and boarding houses, churches, clubs, and public or private schools and charities; Zone “C” allowed for most commercial and office uses, as well uses allowed in the “A” and “B” zones; Zone “D” allowed for all business except industrial and processing facilities; and Zone “E”, which allowed any use. The ordinance enabled areas of the city to be brought before the Council to be zoned, a process which began the following year.

The practice of zoning cities to separate uses from one another began in 1916 and was intended primarily to protect single family homes from other uses. This included not only heavy commercial and industrial uses, but multi-family apartments as well. Apartment buildings, which were generally occupied by lower-income residents and people of color, were seen as undesirable and a threat to single-family property values. Debate over the establishment of zoning in San Diego in 1923 did not commonly include overt discussion of or reference to race, but rather focused on use. Although the zoning ordinance did not include any explicit racial or ethnic segregation, it specifically stated that it was not the intention of the Council to “interfere with or abrogate or annul any easement, covenant, or other agreement between parties; provided, however, that where this ordinance Imposes a greater restriction upon the erection, construction, establishment, alteration or enlargement of buildings, structures or improvements in said zones... the provisions of this ordinance shall control.” Therefore, covenants limiting the sale of properties to people of color and/or establishing a minimum valuation of improvements were allowed to continue under the new zoning ordinance. Additionally, excluding multi-family apartments, which were typically occupied by lower income residents and people of color who were denied equal access to economic opportunity, from single-family zoned areas reinforced segregation that had resulted from other factors such as covenants.

Within this environment of racially restrictive covenants and newly established zoning, the 1920s saw a dramatic increase in the Mexican American population in Southeastern San Diego, as large numbers of immigrants fled to the United States after the Mexican Revolution (1910-1920). Many settled in

Logan Heights and Barrio Logan, which transformed the former into the largest concentration of Mexican families in the city during the 1920s. In 1916, gambling was permitted in Tijuana, which also created a connection between San Diego and Mexico. Additionally, restrictions on European and Asian immigration imposed by the federal government after World War I left many jobs in agriculture, construction, transportation, and mining available for Mexican immigrants. Mexican laborers were instrumental in constructing new housing developments in eastern San Diego, acting as agricultural workers in Imperial Valley, and building transportation and infrastructure projects. The 1930s saw a decline in Mexican immigration due to the scarcity of jobs during the Great Depression and government efforts to deport and repatriate Mexican immigrants. The Mexican American population in greater Logan Heights was estimated at approximately 5,000 in 1937.

The Memorial Park neighborhood became a center of San Diego's African American population in the mid- 1920s, with an especially high concentration near the park itself, roughly between 30th and 32nd and Ocean View Boulevard and Logan Avenue. At the time, Memorial Park was a sub-set of the greater Logan Heights area. By the late 1930s, contemporary accounts identified African American enclaves along 30th Street between Imperial and National Avenues, as well as in Sherman Heights south of K Street. A study of black-oriented churches confirms that Memorial Park was the heart of the African-American community in Southeastern San Diego during this time: Mt. Zion Baptist Church was founded in Logan Heights in 1900 and was the only black-oriented church in the neighborhood; by 1926, six of the city's seven black churches were located in the neighborhood, and by 1940, all eight of the city's black churches were located in the neighborhood. The African American population in Memorial Park and greater Logan Heights was estimated at 4,500 in 1937.

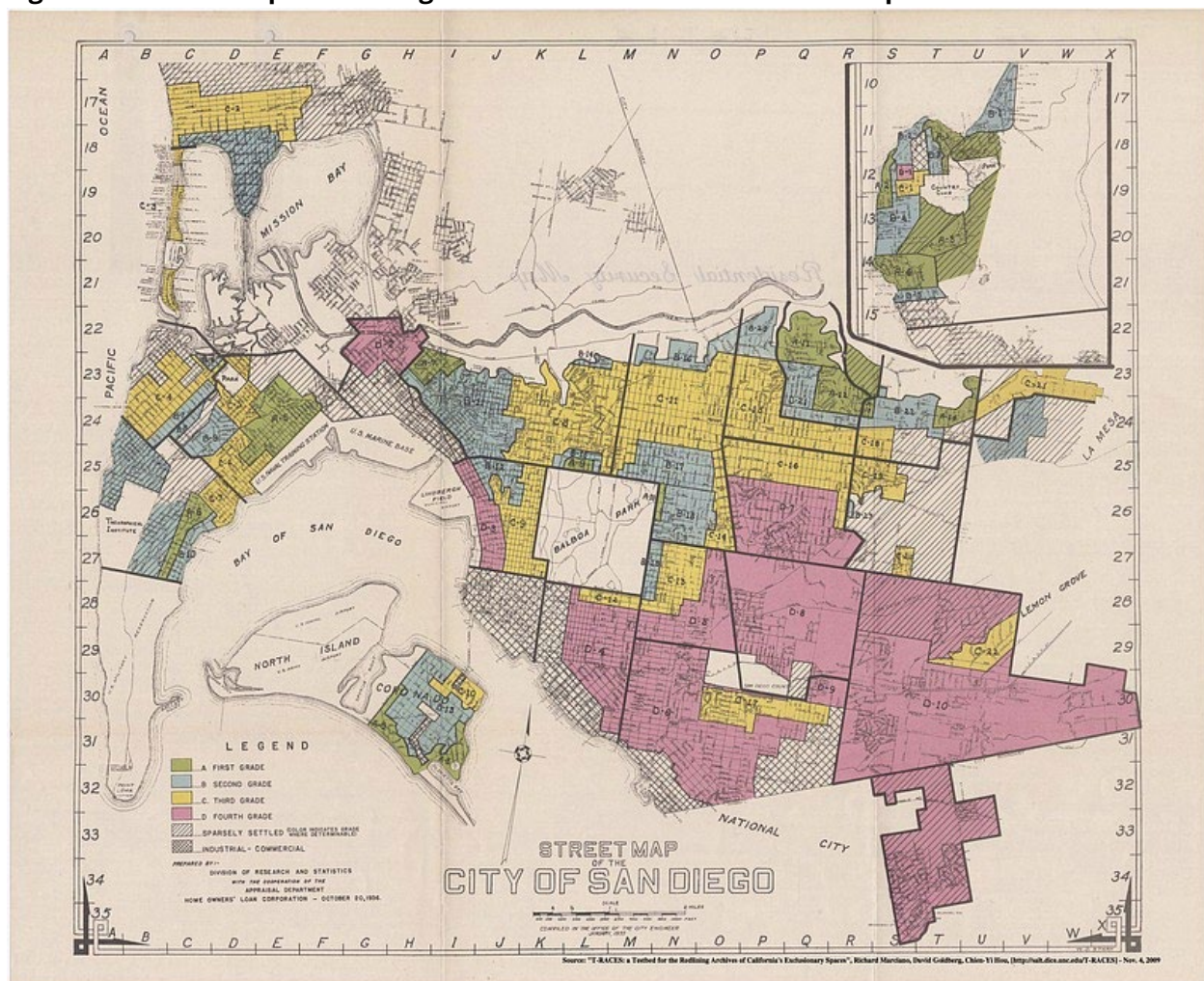
During this 1920s and 1930s, the Japanese population in San Diego was scattered throughout the city in locations such as Mission Valley and Pacific Beach, as well as surrounding areas including Spring Valley, Chula Vista, and Otay Mesa. The Japanese population in San Diego was estimated at approximately 1,000 in 1937. During this time, they were primarily engaged in farming and fishing. Encanto was still a rural suburb and attracted an enclave of Japanese farmers who cultivated the rolling hills.

The community of San Ysidro at the border with Mexico initially developed as an agricultural community outside the boundary of the City of San Diego. Coinciding with the growth in tourism to Mexico in the late 19-teens and early 1920s, San Ysidro shifted from primarily agricultural to residential uses, and the population increased. The community was primarily Anglo at this time, as few Mexicans were living on the U.S. side of the border. Americans were attracted into the area because of recreational gambling and horse racing just over the border in Tijuana, Mexico, while both Americans and Mexicans were attracted to agricultural employment opportunities in and around San Ysidro. A shift in demographics occurred in the border community of San Ysidro around 1933 with the repeal of the 18th amendment that ended Prohibition, the nationalization of foreign-owned properties in Mexico, and the enforcement of Mexican anti-gambling laws. Due to the ensuing decrease in business, Anglo racetrack-related trainers and horse owners left San Ysidro, and some of their homes were purchased by Mexican families who worked in the United States.

The Great Depression brought home construction in San Diego to a near stand-still in the early 1930s, with high unemployment and defaults on existing mortgages. In 1933, the Home Owners Loan

Corporation (HOLC) was established by the Roosevelt administration to buy mortgages at risk of foreclosure and refinance them into new government mortgages, which would allow people to keep their homes. However, the HOLC would not buy and offer mortgages in areas they deemed economically hazardous. To identify these areas, maps were made of major cities with each neighborhood ranked as either "A", "B", "C" or "D". Neighborhoods ranked "D", shown in red on the maps, were ineligible for federal mortgages, an action known as "redlining." Redlined neighborhoods were often the oldest neighborhoods in the City occupied by lower income residents and people of color. This was true for San Diego as well, where most of the redlined neighborhoods were in the Southeastern and southern areas of the City where high concentrations of African Americans, Asians, and Hispanic residents lived (Figure A-19). In 1934, Congress passed the National Housing Act and established the Federal Housing Administration (FHA) to administer a program that offered federal mortgage insurance for private mortgage lenders in an effort to spur private lending. The FHA used the same redlining principles to deny mortgage insurance. Soon private banks, lending institutions, and the Veterans Administration (VA) would follow suit. When the FHA expanded into construction loans for homebuilders, discrimination became even more explicit as the FHA prohibited builders from selling homes to African Americans.

Figure A-19: 1936 Map of San Diego from the Home Owners' Loan Corporation



The United States' entrance into World War II effectively ended the Great Depression in California and boosted the regional economy. This was particularly true in San Diego, which received thirty-five percent of California's aircraft contracts and had the highest per capita share of war contracts in the state. By this time San Diego claimed the Navy's largest air base and the city's harbor housed the repair and operations base for many of the Navy's major aircraft carriers. U.S. Army and Marine Corps camps sprang up throughout the county to train the large numbers of incoming soldiers. In addition, San Diego was home to substantial manufacturing operations. Advertisements nationwide brought thousands of workers into the city to staff the defense plants. The influx of civilian and military personnel caused the San Diego's population to soar. By the summer of 1941, the population had increased from 203,000 to more than 300,000, surpassing in little more than a year the projected growth for the next two decades. Like other large cities with military or manufacturing facilities now devoted to the defense industry, San Diego's population growth far outpaced its ability to provide sufficient services for the many thousands of war industry workers.

During the war there was a need for agricultural and industrial labor to fill the gap left by deployed forces and Mexican immigration to the United States rose at this time as a result of the government-backed Bracero program, between 1942 and 1947, which allowed thousands of Mexican workers to come into the country to work. Throughout the 1940s and into the 1950s, Logan Heights contained fifteen percent of San Diego's Spanish-speaking population. The Bracero program was reconstituted in 1951 and operated until 1964, resulting in a large number of immigrants settling in Logan Heights.

The war-time federal policy of "no discrimination based on race, color or creed" meant that defense housing projects offered an opportunity, albeit limited, for racial minorities to move out of the increasingly blighted neighborhoods in Southeastern San Diego. Housing projects such as Linda Vista (in the hills north of the plan area) and Midway (near the airport) were the only places outside of Southeastern San Diego with notable concentrations of blacks and Hispanics. However, this practice did not last long after the war, and minority newcomers were again forced out of predominantly White neighborhoods and into neighborhoods in Southeastern San Diego and Barrio Logan. African American employment rates dropped to pre-war levels, with war-related opportunities shrinking and some firms who hired African Americans during the war failing to do so afterward. During World War II, the Japanese families who had settled in Southeastern San Diego were forced to move to internment camps. Following the war, most who had owned agricultural land did not, or could not, return to their properties and resettled elsewhere.

The postwar era included important demographic shifts in the neighborhoods of Southeastern San Diego and Barrio Logan. Restrictive zoning and discriminatory covenants in other parts of the city reinforced segregated living conditions that had begun in the 1920s, and Southeastern San Diego became home to a majority of San Diego's poor and non-White residents during the postwar era. The extreme housing shortage that had begun during the war persisted in its aftermath. In response, developers and builders employed earth-moving and mass-construction techniques developed during the war to build large subdivisions in the undeveloped areas of the city north of Mission Valley. Young White families fled the older areas of the city for new subdivisions such as Clairemont and Linda Vista, utilizing G.I. benefits unavailable to minority veterans.

In the 1950s, the City of San Diego rezoned the greater Logan Heights area—especially in present-day Barrio Logan—from primarily residential to an industrial or mixed-use classification. This zoning change resulted in major changes to the land use and character of the neighborhood: commercial and industrial businesses were now located adjacent to residences, and noisy, unsightly automotive scrap yards proliferated. This zoning change combined with municipal transportation decisions and post-war migration patterns created conditions of blight in the Southeastern San Diego and Barrio Logan communities.

A few opportunities for racial integration did exist in portions of Southeastern San Diego, especially near Encanto. Many African Americans moved to Encanto and Valencia Park from Logan Heights in the 1950s and 1960s, taking advantage of the first opportunity they had to own homes. By 1960, African Americans had grown to 6.8% of the population of San Diego, with up to 80% of the community located in what is now East Village and Southeastern San Diego. One of the first non-segregated residential subdivisions in the city was located just south of Encanto in 1955. This new subdivision was located just outside the plan area, but the presence of the first actively racially integrated subdivision likely encouraged others to move to Encanto proper. Some racial tensions existed and many long-term White residents moved to wealthier, segregated sections of the city when African Americans moved into the neighborhood, but Encanto was generally praised in the press for its peaceful and inclusive qualities at a time when tensions were rising in the western half of the plan area.

Emerald Hills Estates, a 1957 subdivision, was technically open to all, although that was not always evident in practice. According to a 1961 newspaper article, a plan was developed under which White residents of the mixed-race subdivision could trade their homes for other residences in housing developments elsewhere. The plan was devised by Irvin J. Kahn but was criticized by the NAACP as well as by residents of the area. A minimum of 200 homes was needed to put the plan into effect, but only 17 applications were received. Passage of the Civil Rights Act of 1964 and the Fair Housing Act of 1968 formally put an end to discriminatory housing practices, but Southeastern San Diego never fully recovered from the declining socioeconomic conditions that had been exacerbated by years of segregated living.

The post-war housing shortage that existed in other parts of San Diego extended to the border community of San Ysidro. Along with single family homes, new construction included small apartment buildings and a handful of post-war bungalow courts. These buildings offered an alternative form of housing for those who either could not afford a single-family home or those who desired an experience similar to a single-family home with a common space for social or recreational activities. Commercial development also expanded greatly along San Ysidro Boulevard; and Institutional facilities, such as the Customs House, public library, and churches were established to service the tourists and/or residents. The town was now a full-fledged city that supported the various economic, social, religious, and recreational needs of the residents and visitors.

In 1957, San Ysidro was annexed to the City of San Diego and is now one of numerous communities within the city. Although water concerns from San Ysidro residents and commercial owners precipitated the idea of annexation, the City of San Diego as a whole recognized the importance of the border to the region and voted for annexation in 1957. For the City, San Ysidro provided "...a direct land connection to Mexico and a stake in the international trade that flows across the United States-

Mexico border.” Shortly after its annexation, the community experienced a shift in demographics as the population transitioned from primarily Anglo to Mexican in the 1960s. In addition, San Ysidro continued to play an important role in the local, regional, and national economy as the border crossing became the busiest crossing in the U.S. in 1988.

As the population in Southern California continued to expand after World War II, increasing traffic congestion led city engineers to create a new transportation system to move large volumes of cars quickly without having to pass through congested business districts. In San Diego, master planning for the new freeways began in the early 1950s, and the communities of Southeastern San Diego, Barrio Logan, Golden Hill, San Ysidro, and the East Village area of Downtown were all heavily affected by these plans. Large swaths of these neighborhoods, which housed most of the City’s lower income residents and people of color, were razed in the 1950s and 1960s to make way for the six- and eight-lane freeways, effectively eliminating the once-fluid edges of the neighborhoods. The freeways not only demolished some of the neighborhoods’ oldest buildings, but also displaced families and businesses and exacerbated social issues. Socioeconomic consequences caused by the freeway construction included segregation of lower-income and ethnic minorities; reduction in existing affordable housing stock; separation of communities from services such as stores, churches, and schools; and health impacts resulting from increased exposure to pollutants.

Prior to the highway construction that bisected Logan Heights and essentially created Barrio Logan as it is known today, this community contained the largest Mexican-born and “Spanish surnamed” community in San Diego though its ethnic makeup also contained a minority of African Americans, European Americans, and Asian Americans. The completion of Interstate 5 through the heart of Logan Heights in 1963 rewrote the boundaries of the neighborhood. The interstate splintered Logan Heights in two, with the area to the southwest of Interstate 5 becoming known as Barrio Logan and the area to the northeast known as Logan Heights. The Mexican American residents of Logan Heights have used the word *barrio*, Spanish for “neighborhood,” to describe the area from the early years. In its most positive connotation, outsiders and Mexican Americans alike refer to predominantly Mexican American urban neighborhoods as *barrios*. Many residents embraced the cultural association that came with the capital “B,” claiming Barrio Logan as a Chicano space. The City officially initiated the use of Barrio Logan to describe the area southwest of the Interstate 5 in the 1970s.

The completion of the San Diego-Coronado Bay Bridge in 1969, which towered over Barrio Logan with its on-ramps and support pylons, displaced more families and businesses, creating a dramatic physical and visual change to the neighborhood. The residents were not aware of their rights to protest against the bridge and many felt they had no choice but to leave. Barrio Logan’s population dropped from 20,000 to 5,000 between 1969 and 1979 and many of the older homes and buildings were razed for industrial structures.

During the 1960s and early 1970s the Chicano movement became a powerful force for change and promoted a social movement within the Mexican American community of Barrio Logan and Logan Heights. United by a concern for equal rights, Mexican Americans adopted the terms Chicano and Chicana to identify them not just of Mexican heritage but also of mestizo ethnicity. The first Chicano activity in Barrio Logan occurred in the late 1960s when young college students and veterans of the Vietnam War, inspired by the national Chicano movement, instituted some small clean-up projects in

the area. Yet it was the 1970 takeover of a 1.8-acre plot of land beneath the San Diego-Coronado Bay Bridge that propelled the movement into the consciousness of the larger San Diego community. In April 1970, a young Chicano activist, Mario Solis, alerted the community to the commencement of construction of a California Highway Patrol station beneath the bridge on the land that City officials had promised as a park. Word spread quickly, and protesters successfully stopped the earth moving activities and occupied the park. The occupation lasted twelve days, after which the City agreed to grant the community the land and surrounding property totaling 7.4 acres. When it came time to choose a name for the park, the residents chose “Chicano Park” in recognition of the Chicano movement that had been so influential in inspiring the protest. The creation of the park has been cited as the defining event in Barrio Logan’s recognition as a Chicano community.

Freeway construction continued in the early 1970s, and at this time disrupted the street system in San Ysidro. Residential and commercial buildings were removed to make way for the freeways. In 1971, Interstate 5 was straightened and widened for the millions of vehicles traveling to and from Mexico. In addition, construction of Interstate 805 also began in 1971 and led to the demolition of two hundred homes in old San Ysidro. It essentially bisected the town into two sections, displacing residents and disrupting local businesses. Freeway development was the main reason why the San Ysidro border crossing became the busiest in the United States.

As the water quality in San Ysidro improved in the late 1960s and investors saw promise in the proximity to the new Highway 5, building activities increased. The first subdivision in San Ysidro since the early 20th century, Mount Carmel Heights, was filed by the San Ysidro Development Co. The developer specifically built “...frame and stucco dwellings with distinctive Spanish designs to appeal to Mexican-American families from Tijuana.” Housing development in the northern area of San Ysidro also increased to offset the displacement of residents due to construction of Interstate 805, including the development of Barrio San Martín and an addition to Mount Carmel Heights. In addition to Mount Carmel Heights and other single-family housing subdivisions, developers began to construct multi-family units in San Ysidro from the 1960s through the 1980s. Some, like Villa Nueva, were federally subsidized to provide homes for families displaced by freeway construction. By 1988, over half the population in San Ysidro was of Mexican descent. Many of these families lived in recently built housing developments that were funded in part by Federal subsidy programs.

The northern areas of the city, including University, Mira Mesa, Rancho Bernardo, and Rancho Penasquitos began developing in the 1960s, followed by areas such as Scripps Ranch and Carmel Valley in the 1980s and 1990s. Like other large suburban developments of the post-WWII period, these communities were not served by meaningful transit, were accessible primarily by car, and were predominantly home to middle and upper-middle class Caucasians. Demographics shifted in some of these communities in the decades that followed, due primarily to the presence of the University of California San Diego and Marine Corps Air Station Miramar. The community of Mira Mesa exhibits strong diversity. In 2016, Asians constituted 39 percent of the population, while non-Hispanic Whites made up 33 percent. Hispanics represented 20 percent, residents with two or more races made up four percent, and Blacks constituted three percent of the CPA’s population. In comparison to the City of San Diego in 2017, Asians made up 17.3 percent of the total population, Hispanics 30.3 percent, and non-Hispanic White 56.7 percent. However, the majority of the communities in the northern areas of the City remain predominantly White.

Over the course of the City's development, there has been a constant push and pull between development and opposition to growth, dating back to the early 20th century and the "Smokestacks vs Geraniums" debate of the 1917 mayoral election. City boosters envisioned a great city that would rival Los Angeles, while Progressives and others wanted to maintain and enhance San Diego's natural beauty for the enjoyment of residents and tourists. This longstanding debate eventually made its way directly to the ballot box via citizen-led initiatives. On November 7, 1972, City of San Diego voters approved Proposition D, which would have a significant impact on housing within the coastal areas of the City. Proposition D placed a 30-foot height limit on all buildings in the coastal height limit overlay zone, which roughly covers those portions of the City of San Diego lying between Interstate 5 and the coast. The ballot argument in favor of Proposition D stated that it intended to preserve the "unique and beautiful character of the coastal zone of San Diego," by preventing high rise buildings from "fencing off private property" and "obstructing needed ocean breezes, sky and sunshine." However, after almost 40 years the proposition has also had the effect of limiting density and housing supply within the coastal areas of the City, thereby contributing to increased costs that exclude middle- and lower-income residents. This also results in the exclusion of people of color to the extent that they are disproportionately impacted by unequal access to economic opportunity and wealth-building.

Proposition A, placed on the ballot and passed by voters in 1985, limited development of 52,273 acres in the northern area of the City identified as "Future Urbanizing Area" in the Progress Guide and General Plan. These were areas that the 1979 plan did not anticipate being needed for housing development until 1995. Rather than allowing development of the FUA to be at the discretion of the City Council, Proposition A required a vote of the people to shift lands from "Future Urbanizing" to "Urbanized", thereby permitting development. At the time Prop A was passed in 1985, smaller jurisdictions had passed similar growth management measures, but San Diego was "by far and away the largest city in the state, and possibly the nation, to consider a measure that would place individual growth determinations directly in the hands of voters," according to a Los Angeles Times article.

With the adoption of the City's Comprehensive General Plan Update in 2008, the City implemented its "City of Villages" smart growth strategy, which focuses growth into mixed-use activity centers that are pedestrian-friendly districts linked to an improved regional transit system. It recognizes the value of San Diego's distinctive neighborhoods and open spaces that together form the City as a whole. A "village" is defined as the mixed-use heart of a community where residential, commercial, employment, and civic uses are all present and integrated and offer a variety of housing types affordable for people with different incomes and needs. Over time, villages will connect to each other via an expanded regional transit system. The General Plan update did not include land use designation or zoning changes, which is the purview of the City's community plans. Since the adoption of the General Plan, the Planning Department has updated 10 of its 52 community plans and is currently updating five more. All of these efforts have increased density along transit corridors and encouraged mixed use development that facilitates living near one's place of work. The City is also making equity a priority in all planning initiatives and engaging stakeholders in how best to break-down the vestiges and remnants of explicit and implicit discrimination and segregation so that all San Diegans have equitable access to quality housing and City services, regardless of race, ethnicity, sex, income, or any other identifier.

CONCLUSIONS, SUMMARY OF ISSUES, AND CONTRIBUTING FACTORS

Concentrations of individuals on the basis of race, ethnicity, income, familial status, and to a lesser degree disability can be seen within the City. Lower income individuals and people of color are disproportionately concentrated in areas to the east and south of downtown. These patterns of concentration are the result of several intersecting factors that include:

- explicit social discrimination during the City's early development;
- employment discrimination against people of color that denied them access to economic mobility;
- "White flight" from older suburban areas developed around the turn of the 20th century in the communities to the east and southeast of downtown;
- the use of restrictive covenants in real estate deeds between 1910 and 1948 in many areas of the City that prohibited sale of the property to individuals not of the Caucasian race and established minimum valuations that excluded lower income property owners and residents;
- the implementation of zoning in 1923 that protected single-family homes from all other development, including multi-family development; thereby reinforcing existing racial and economic segregation;
- redlining of many of the City's older neighborhoods occupied by lower income residents and people of color, preventing them from securing mortgages, purchasing or improving property, and building generational wealth;
- rezoning actions that permitted encroachment of industrial uses near neighborhoods occupied by lower income individuals and people of color;
- construction of freeways through older communities that disproportionately impacted lower income individuals and people of color, demolishing buildings, displacing residents and business, and cutting communities off from one another; and
- growth management initiatives that limit the City's ability to increase housing in certain areas of the City without a vote of the people.

While many of the above factors have since been deemed unconstitutional and/or immoral and are no longer in practice, the effects of these past actions remain and are evident in the levels of segregation and integration throughout the City, as discussed above. More must be done to break down and remove barriers to fair housing choice for all San Diegans.

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

To assist communities in identifying racially and ethnically concentrated areas of poverty (also known as RECAPs), HUD developed a definition that relies on a racial and ethnic concentration threshold, as well as a poverty test. For an area to be identified as having a racial and ethnic concentration, the threshold is that a RCAP or ECAP have a non-White population of 50 percent or more, within metropolitan or micropolitan areas. In locations outside these areas, where the non-White populations are likely to be much smaller than 50 percent, the threshold is set at 20 percent. The poverty test defines areas of “extreme poverty” as those where 40 percent or more of the population lives at or below the federal poverty line, or those where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. An area that meets either the racial or ethnic concentration and also meets the poverty test would be considered a RCAP or ECAP; broadly referred to as RECAPs.

REGIONAL AND LOCAL PATTERNS AND TRENDS

The following section address regional and local patterns and trends of concentrations of people of different races and ethnicities who experience poverty and associated limited access to quality environments, jobs, and public facilities including schools. There are a number of available assessment tools to identify co-concentrations of poverty and people belonging to racial and ethnic groups. The tools utilized in this analysis are the Racially and Ethnically Concentrated Areas of Poverty (RECAPs) methodology; the TCAC Area of High Segregation and Poverty methodology, the TCAC Access to Opportunity methodology, and the Racially Concentrated Areas of Affluence methodology. These methodologies are described in the California Department of Housing and Community Development’s Affirmatively Furthering Fair Housing Guidance (April 2021 Update).

Local Patterns and Trends

As shown in Figure A-20, RECAPs within the City of San Diego include the southeastern corner of the Downtown community; the northern portion of the Barrio Logan Community; significant portions of the Southeastern San Diego Community, the southwestern corner of the Encanto Communities, and two census tracts in the northeastern portion of the Mid-City: City Heights community.

Figure A-20: RECAPs, City of San Diego

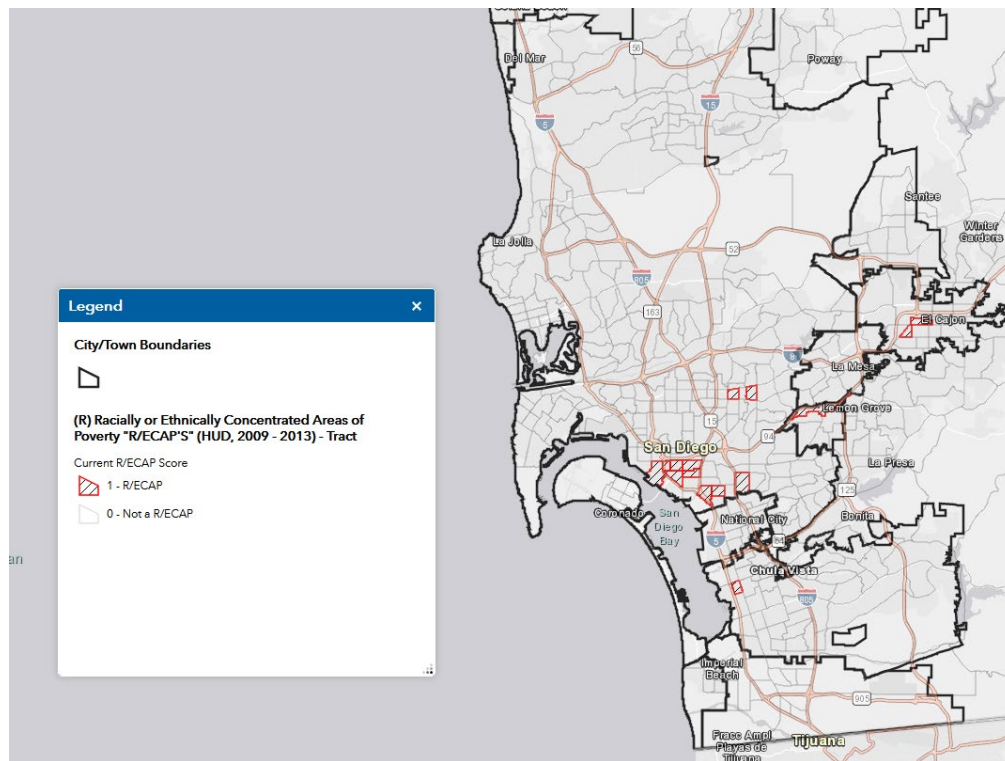
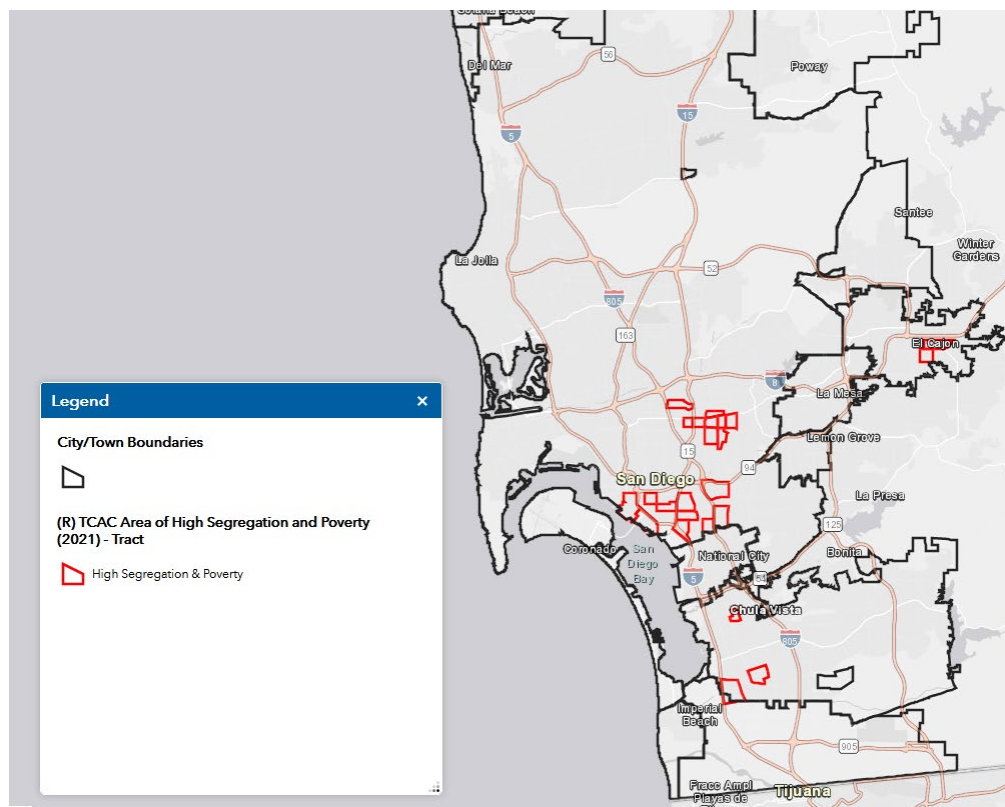
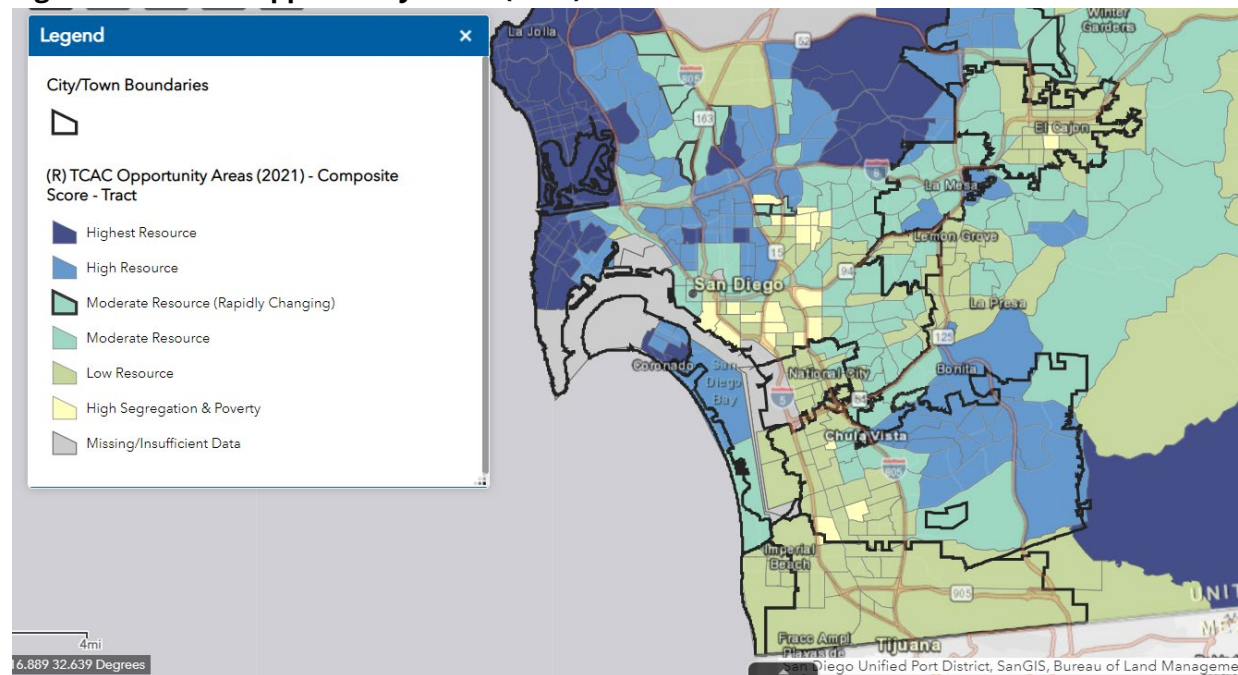


Figure A-21: TCAC Area of High Segregation and Poverty (2021), City of San Diego



Areas identified through the TCAC High Segregation and Poverty and Low Resource methodology within the City of San Diego (Figure A-21) are similar to but more extensive than those identified as RECAPs. The High Segregation and Poverty and Low Resource areas include the southeastern corner of the Downtown community; the northern and central portions of the Barrio Logan Community; significant portions of the Southeastern San Diego Community, the most of the western side of the Encanto Communities, a portion of the Normal Heights community, a significant portion of the Mid-City: City Heights community, and a small portion of the Otay Mesa-Nestor community bordering the City of Chula Vista. These High Segregation and Poverty and Low Resource areas are located within a context a broad, contiguous area of low resources, as measured by the TCAC Opportunity Areas methodology (Figure A-22). This low resource area spans the majority of the following communities, and portions of adjacent communities and cities: Mid-City: City Heights, Barrio Logan, Southeastern San Diego, Encanto Communities, Otay Mesa-Nestor, Otay Mesa, and San Ysidro. Another low resource area further north within the City, the Kearny Mesa community, has a largely commercial and industrial history with small pockets of residential development.

Figure A-22: TCAC Opportunity Areas (2021)



Within the City of San Diego the largest cluster of segregation and poverty is located south of Interstate 94 to the northern border of National City. Another large cluster is in the communities of Mid-City: City Heights and Mid-City: Normal Heights, north of Interstate 94, along Interstate 15. When the areas of high segregation and poverty are compared with the redlining maps, it is clear that these areas have been harmed by the racist policies of the past.

Figure A-23: TCAC Areas of High Segregation and Poverty (2021) and HOLC Redlining Map, City of San Diego

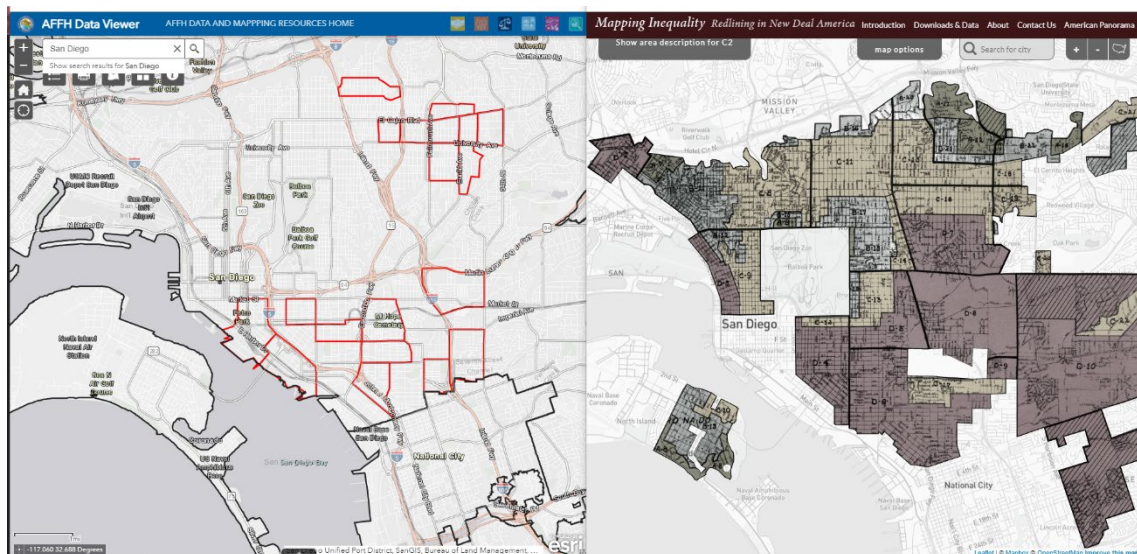


Figure A-23 above shows the areas of high segregation and poverty within the City of San Diego alongside the redlining map of the City of San Diego. All of the areas that are currently experiencing high levels of poverty and segregation were labeled “D- Hazardous”, or “C- Definitely Declining”. For instance, the areas South of the Interstate 94 to the boarder of National City, are within the Southeastern and Encanto community planning areas. Both of these areas were predominately labeled “D” with a small portion labeled “C”. The description for area D8 on the map read, “Topography badly cut by canyons. Residents low salaried classes white and Mexican. Homes poorly maintained” (Mapping Inequality, <https://dsl.richmond.edu/panorama/redlining/#loc=11/32.697/-117.28&city=san-diego-ca&area=D8>)

The areas with the “D” rating have suffered years of decline and lack of investment since they were redlined. Today these the areas with high segregation and poverty also have low median incomes, a lower percentage of adults with a college degree, a higher percentage of renter households, and a higher percentage of rent burdened households. The people of these areas were denied the advantage to capital to purchase homes and establish generational wealth. Further, according to “The Other Side of the Freeway” by LeRoy Harris, racially restrictive covenants were also used to keep people of color from occupying homes throughout San Diego. In a study of covenants within Southeastern San Diego, a majority of the deeds examined included restrictive clauses such as “This property shall not be sold, leased, rented or occupied by any person other than one of the Caucasian race” (Page 176).

After redlining, these areas became areas where new arrivals to San Diego, in particular Black, Hispanic, and Asian people, could find affordable housing that they were permitted to rent. Unfortunately, without owners occupying the housing units in these areas and without property owner investment in the now-rental properties, the housing stock began to deteriorate with time and neglect. Similarly, due to racial prejudice from predominantly white elected officials and civil servants,

these areas lacked advocacy power for infrastructure investment from public agencies such as the City of San Diego. Within the City of San Diego, development impact fees (DIF) were established in the second half of the twentieth century; however, with the requirement that the fees be spent within the community that was being impacted by new development. When the communities north of Interstate 94 began to develop new suburban housing, fees were paid for public infrastructure to serve the communities. Infrastructure such as parks, trees, streets, schools and investments in public transportation were made. The older southern communities did not receive new public infrastructure investment from the City since fees were not being paid by new development in these communities. The new northern communities were desirable, and any (mostly white) residents occupying homes south of Interstate 94 that could afford to move, moved away from those areas, leaving these areas inhabited by persons of color and new migrants to the City. This movement is known as “white flight” and it shaped the landscape of the City of San Diego.

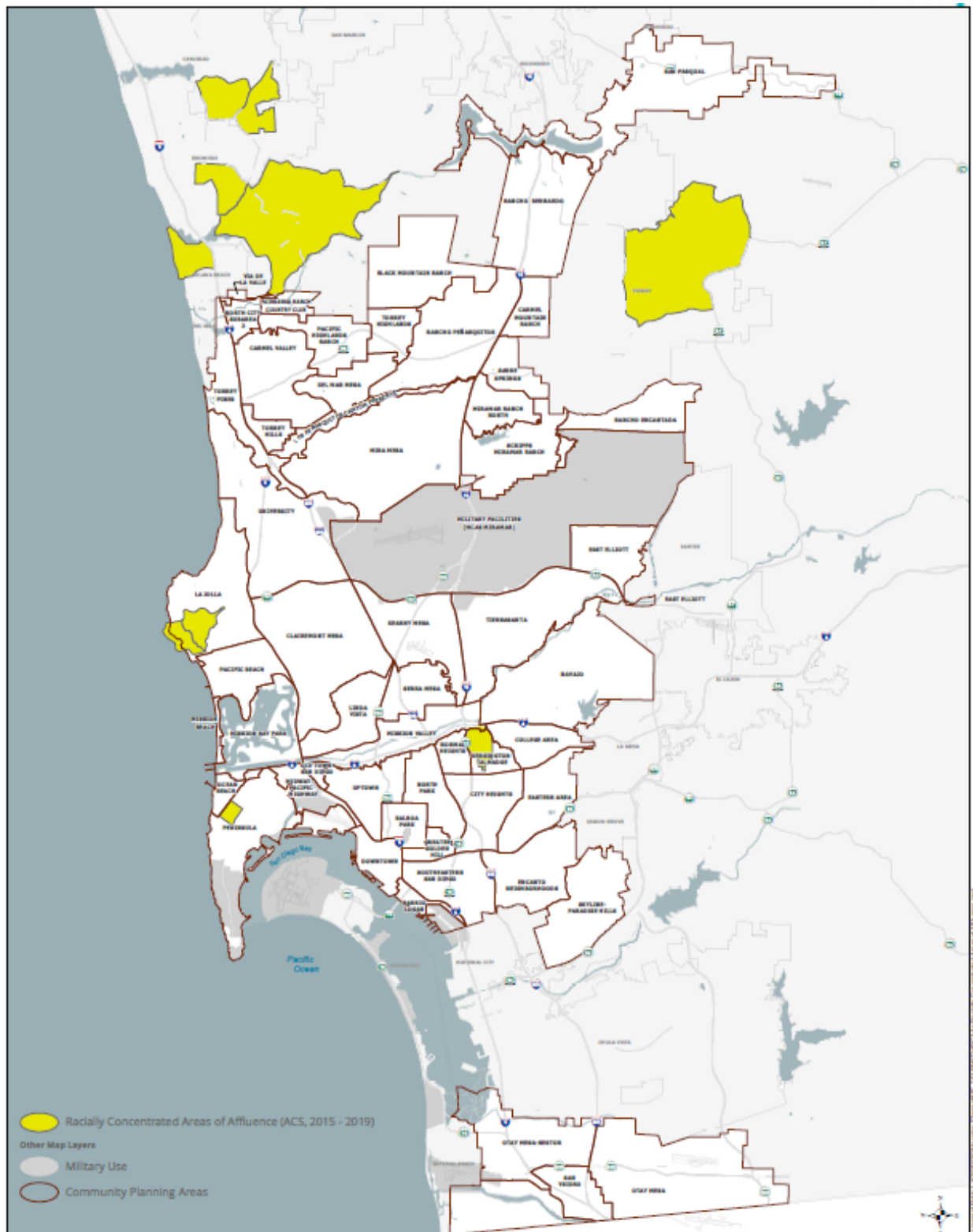
When the eastern and northern areas of the City began to develop in the 1950s and 1960s the housing stock with primarily single-family homes with the zoning to support this type of development. These homes were bought and occupied predominantly by whites due to the capital and means they had available from access to well-paying jobs and economic mobility. Racially restrictive covenants were still widely used during this time further restricting the movement of people of color to the northern areas of the City of San Diego. The result was the development of white suburban communities with access to new public infrastructure and new schools while people of color were confined to the southern areas of the City with deteriorating infrastructure and underperforming schools. The single-family zoning that was predominant, and still is today in the new communities to the north, excludes more affordable multifamily housing. This exclusion has kept many a people of color out of many of the more affluent areas of San Diego.

These effects of redlining and restrictive covenants have had a devastating impact on people of color within the City of San Diego. As a result, the City of San Diego is looking at how more public dollars can be spent in the communities that are in most need as evidenced by the Complete Communities initiatives (described further in the Other Relevant Factors section below).

Racially Concentrated Areas of Affluence in the City of San Diego

Within the City of San Diego, racially concentrated areas of affluence (Figure A-24) are found in the La Jolla, Kensington-Talmadge, and Peninsula communities. La Jolla is located along the coast and was first established as a “colony” in the early 1900s and later established as a resort community in 1946 with the first community plan focusing on “preserving” the area for visitors. The San Diego redlining map gave the majority of La Jolla an “A” (Best) grade and the rest received a “B” (Still Desirable) grade. The redlining map description read “Residents embrace nearly all types of profession and are all white. No threat of any foreign infiltration. Homes are well maintained. Streets attractive and practically all paved” (Mapping Inequality, <https://dsl.richmond.edu/panorama/redlining/#loc=13/32.797/-117.27&city=san-diego-ca&area=B4>). Today, La Jolla has maintained its exclusivity and luxury “resort” feel. Many of the homes are large single-family homes with large lots. The coastline has been preserved and the University of San Diego and Scripps Institute of Oceanography are both located in La Jolla.

Figure A-24: Racially Concentrated Areas of Affluence – City of San Diego and Environs



The Kensington portion of the Kensington-Talmadge community is also identified as a racially concentrated area of affluence. Kensington is uniquely situated on a narrow peninsula isolated on three sides by steep slopes and canyons, much of which is preserved open space. Kensington, an early far suburb that was subdivided and developed with homes and “estates” lot-by-lot in the first half of the 1900s, has uniquely designed and historic single family homes, a quaint business district along Adams Avenue dividing the northern and southern halves of the community, and a sense of exclusivity and separation from adjacent communities. The San Diego redlining map gave the portion of Kensington north of Adams Avenue an “A” (Best) grade and the portion south of Adams Avenue a “B” (Still Desirable) grade. The redlining map description for the A-graded portion of Kensington read “This area known as Kensington Heights, Units No. I, II, III. Gentle canyons, mesa lands adapted to high class landscaping, almost identical with A-12.” Redlining map area A-12, which includes most of the Talmadge community, was described as “Residents white, with a few of the upper class Spanish families, consisting of Naval Officers, business and professional men and retired people. Income range \$3600 up. No ratio of concentration; no threat of infiltration, restricted to the Caucasian race.” (Mapping Inequality, <https://dsl.richmond.edu/panorama/redlining/#loc=13/32.797/-117.27&city=san-diego-ca&area=B4>).

The Peninsula community encompasses the Point Loma peninsula, which lies between the Pacific Ocean and San Diego Bay. The portion of the community that is an racially concentrated areas of affluence, which largely coincides with the “Ocean Beach Highlands” neighborhood, is located on a hillside on the western side of the peninsula facing the Pacific Ocean and walking distance to the beach. The Peninsula community has been inhabited by Europeans and their descendants since the mid-1800s and has close cultural ties to sailing and the Navy, which has multiple installations on the peninsula. Peninsula/Point Loma was subdivided and developed with homes lot-by-lot in the early days of the City of San Diego when it came under American control and, similar to the Kensington community, has uniquely designed and historic single family homes, which are highly desirable for their proximity to and views of the ocean. Portions of this racially concentrated areas of affluence were graded by the redlining map, receiving a B grade. The redlining map description for the graded areas reads “This area lies along the top of the hill above Ocean Beach, affording an excellent view of the Pacific Ocean and Mission Bay. It is favorably regarded generally and the residents are all white, with income range from \$1500 to \$5000.”

Regional Patterns and Trends

As shown in the maps on the following page, within the San Diego County region, the highest number of TCAC Areas of High Segregation and Poverty and RECAPs are in the City of San Diego. There is a very small area in northern San Diego County in the City of Oceanside along the coast that shows a high concentration of segregation and poverty, another small area in the City of Escondido, and in El Cajon. To the south of San Diego, in the City of Chula Vista, the maps shows three areas with high areas of segregation and poverty. However, the largest cluster of segregation and poverty can be found within the City of San Diego.

Figure A-25: TCAC Areas of High Segregation and Poverty (2021), San Diego County

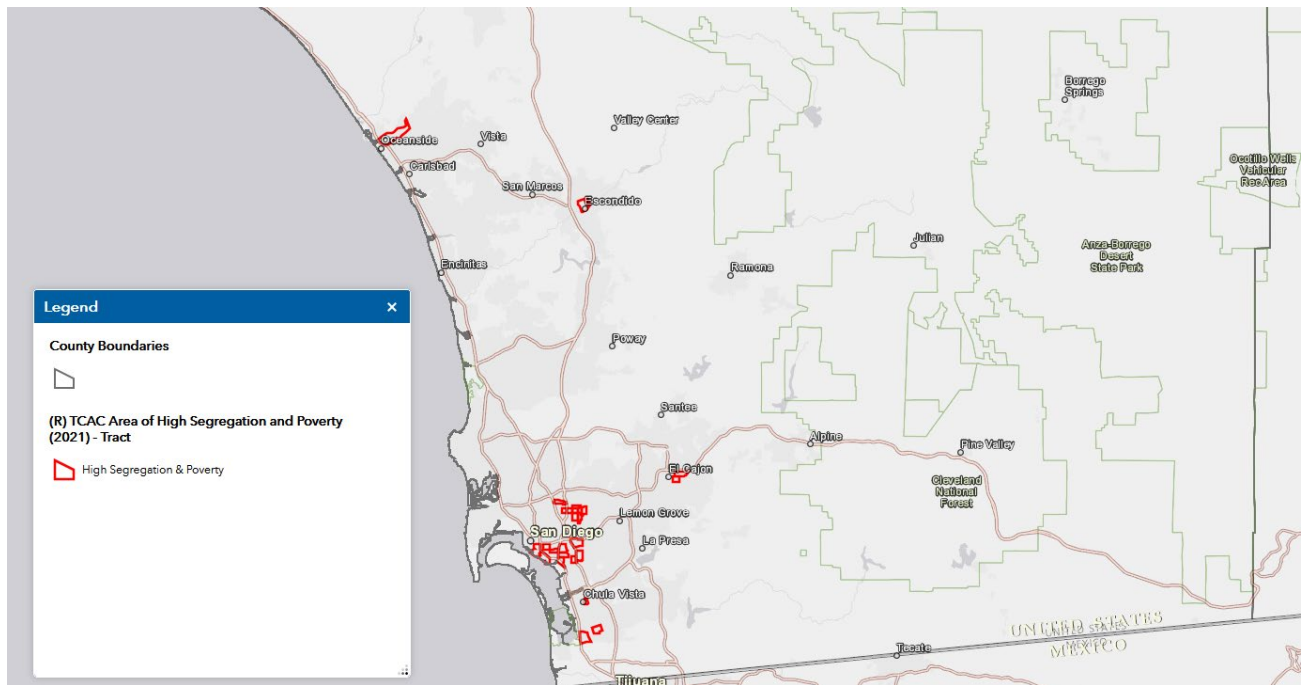
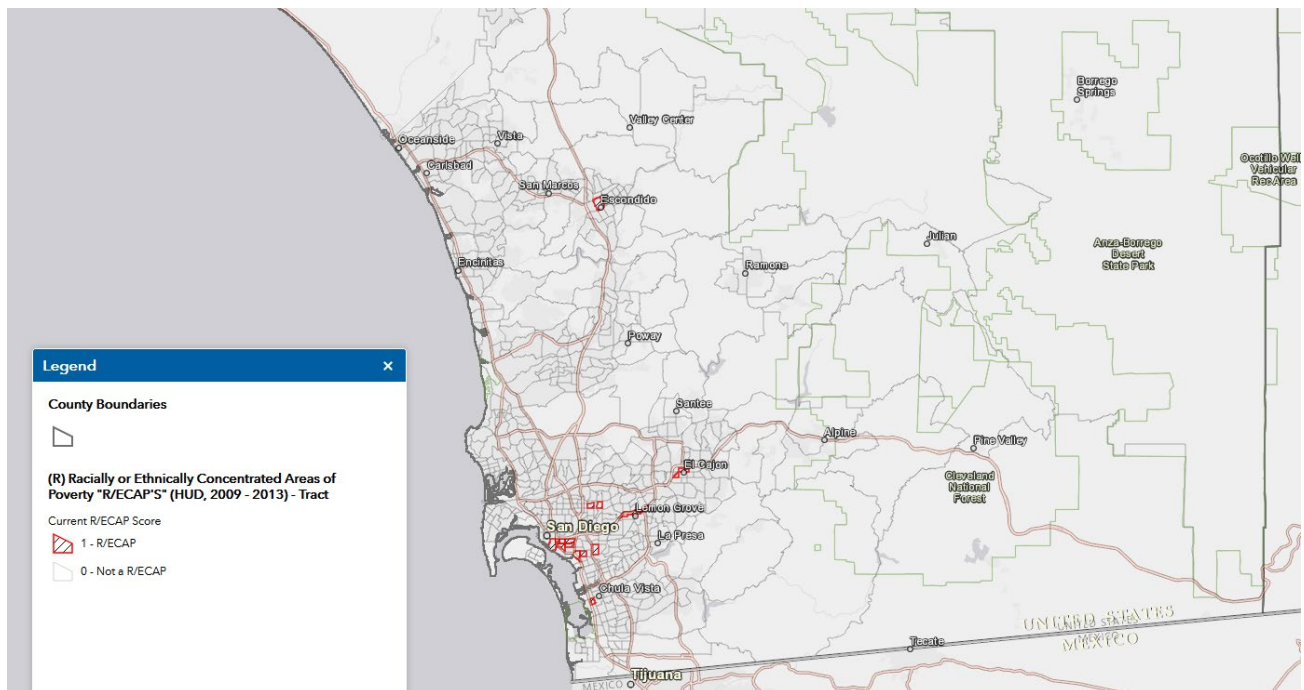


Figure A-26: RECAPs, San Diego County



Racially Concentrated Areas of Affluence in San Diego County

Figure A-24 in the Local Patterns and Trends section above shows the Racially Concentrated Areas of Affluence (RCAAs) portions of San Diego County near the City of San Diego. The largest RCAAs are located in the northern areas of the region, in the City of Carlsbad, City of Encinitas, City of Solana Beach, and within the City of Poway. The coastal communities of Carlsbad, Encinitas and Solana Beach have drawn affluent persons due to their close proximity to the beaches. These areas have a predominance of newer single-family homes, good school districts, and public infrastructure to meet the needs of the residents. The City of Poway incorporated in 1980 after a dam was constructed to provide a water source to the area. The majority of the growth in the area happened after the city's incorporation and provides a relatively new community in the San Diego region. Due to the City of Poway's recent construction many of the homes are newer, single family homes, the schools are modern, and the city has newer public infrastructure to serve the city's residents. The City of Poway has become a desirable place to live for many residents of the region due to quality of life and schools that it provides.

Concentrations of Poverty and Related Factors Information from the Regional Analysis of Impediments to Fair Housing Choice

The San Diego Regional Analysis of Impediments to Fair Housing Choice 2020, (known as the "AI"), "presents a demographic profile of San Diego County, assesses the extent of housing needs among specific income groups, and evaluates the range of available housing choices for residents. The AI also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing. More importantly, this AI identifies impediments that may prevent equal housing access and develops solutions to mitigate or remove such impediments" (ES-I, AI). The AI found the following information for the San Diego Region:

Concentrations of Poverty

"Countywide, over 13 percent of residents (or 427,031 persons) were living below the poverty level (according to 2013-2017 ACS data). Poverty was more prevalent for specific groups such as Hispanics (18.7 percent), Blacks (19.9 percent), and adults with less than a high school education (23.4 percent). In contrast, 12.6 percent of White residents, 10.3 percent of Asian residents, and five percent of residents with at least a bachelor's degree were living below the poverty level during the same time period." (Page, 64, AI Report 2020)

"According to the 2013-2017 ACS estimates, 13.3 percent of the population is living below the poverty line countywide. Similar to low- and moderate income areas, areas of poverty concentration are clustered in three general areas of the County. In North County, concentrations can be seen in the cities of Oceanside, San Marcos, Escondido, Carlsbad and Encinitas. In the southern portion of the county, concentrations can be seen in the central areas of the City of San Diego" (Page 64, AI Report 2020).

"In an effort to identify racially/ethnically-concentrated areas of poverty (RECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and has a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. An analysis of racially and ethnically concentrated areas of poverty is

important because families who live in such neighborhoods encounter challenges and stresses that hinder their ability to reach their full potential, and such neighborhoods impose extra costs on neighboring communities and the region. In San Diego County, there are RECAPs scattered in small sections of Escondido, El Cajon, La Mesa, Lemon Grove, National City, and Chula Vista. Larger RECAP clusters can be seen in the central/southern portion of the City of San Diego” (Page 64, AI Report 2020).

Tenure by Income and Race/Ethnicity

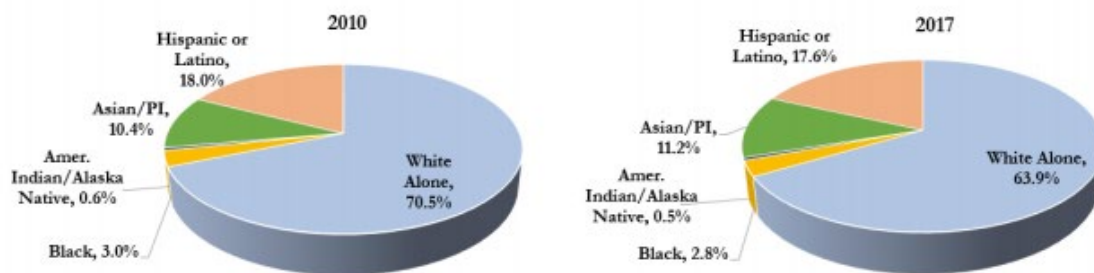
“A substantial income and housing disparity exists between owner- and renter-households. Table [A-6] indicates that San Diego County renters are more likely to be lower and moderate income and are more likely to experience housing problems such as cost burden and substandard housing conditions. The county’s tenure distribution also has a racial and ethnic component as many ethnic minority populations in San Diego County have not achieved housing homeownership as readily as the White population. In fact, as of 2017, the majority of owner-occupied households were White (Figure [A-27]). Of those who owned the housing units they occupied, 64 percent were White; 18 percent were Hispanic; three percent were Black; and 11 percent were Asian/Pacific Islanders. Comparing these figures to race data from the 2013-2017 ACS demonstrates that minorities in the county are underrepresented in terms of homeownership. For comparison purposes, according to 2013-2017 ACS data, Whites are 46 percent of the county population, Hispanics are 33 percent, while 12 percent are Asian/Pacific Islander and only five percent of the population was Black” (page 70, AI Report 2020).

Table A-6: Housing Problems by Tenure

Tenure	Percent of All Households	Percent Low and Moderate Income	Percent with Housing Problems	Percent with Cost Burden (>30%)
Renters	47.3%	61.4%	56.8%	51.9%
Owners	52.7%	31.4%	35.1%	33.1%
Total Households	100.0%	45.6%	45.4%	42.0%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Figure A-27: Housing Problems by Tenure



Sources: American Community Survey (1-year estimates), 2010, 2017.

Loan Applicant Representation

"In a perfect environment, the applicant pool for mortgage lending should be reflective of the demographics of a community. When one racial/ethnic group is overrepresented or underrepresented in the total applicant pool, it could be an indicator of unequal access to housing opportunities. Such a finding may be a sign that access to mortgage lending is not equal for all individuals. As shown in Table [A-7] throughout San Diego County, White applicants were noticeably overrepresented in the loan applicant pool, while Hispanics were severely underrepresented. The underrepresentation of Hispanics was most acute in the cities of Escondido (-33 percent), Vista (-32 percent), Imperial Beach (-30 percent)" (Page 125, AI Report 2020).

Table A-7: Demographics of Loan Applicants vs. Total Population

San Diego County	Percent of Applicant Pool (2017 HMDA)	Percent of Total Population (2010 Census)	Variation
White	51.5%	48.5%	3.0%
Black	3.1%	4.7%	-1.6%
Hispanic	16.4%	32.0%	-15.6%
Asian	9.7%	10.6%	-0.9%
Other	19.2%	4.2%	15.0%

Notes:

1. Percent of total population estimates are based on 2017 applicant data and compared to total population estimates from the 2010 Census.
2. Other" includes Native American, Hawaiian, MultiRace, Unknown/NA.
3. Local jurisdiction data can be found in Appendix B.

Source: Bureau of the Census, 2010; www.lendingpatterns.com, 2020

Lending Outcomes by Race and Income

"Table [A-8] summarizes lending outcomes by race/ethnicity and income in San Diego County. White applicants at all income levels generally had the highest approval rates. Similarly high approval rates were recorded for Asian applicants, although there was some variation by jurisdiction. Approval rates for Black and Hispanic applicants, however, were well below the approval rates for White and Asian applicants in the same income groups in 2012. These gaps had narrowed somewhat by 2017, but were still present. Specifically, Black applicants consistently had the lowest approval rates compared to other racial/ethnic groups in the same income groups. The largest discrepancies (between loan approval rates for White and Asian applicants versus Black and Hispanic applicants) in 2017 were recorded in the cities of El Cajon, Encinitas, and San Marcos. Detailed lending outcomes by race/ethnicity and income for each jurisdiction can be found in Appendix B. While this analysis provides a more in-depth look at lending patterns, it does not conclusively explain any of the discrepancies observed. Aside from income, many other factors can contribute to the availability of financing, including credit history, the availability and amount of a down payment, and knowledge of the homebuying process. HMDA data does not provide insight into these other factors" (Page, 126, AI 2020).

Table A-8: Lending Patterns by Race/Ethnicity and Income (2012-2017)

San Diego County	Approved		Denied		Withdrawn/ Incomplete	
	2012	2017	2012	2017	2012	2017
White						
Low (0-49% AMI)	55.7%	41.6%	27.3%	30.4%	17.0%	27.9%
Moderate (50-79% AMI)	65.2%	54.0%	17.3%	19.9%	17.5%	26.0%
Middle (80-119% AMI)	69.8%	64.0%	13.3%	13.1%	16.8%	22.9%
Upper (≥120% AMI)	70.9%	66.9%	11.8%	11.2%	17.4%	21.9%
Unknown/NA	75.3%	55.7%	9.6%	13.1%	15.1%	31.2%
Black						
Low (0-49% AMI)	45.5%	31.7%	38.8%	49.2%	15.8%	19.1%
Moderate (50-79% AMI)	54.9%	45.2%	24.7%	27.6%	20.5%	27.2%
Middle (80-119% AMI)	61.6%	57.5%	19.3%	17.9%	19.1%	24.6%
Upper (≥120% AMI)	60.6%	59.5%	19.9%	18.1%	19.5%	22.5%
Unknown/NA	74.3%	58.8%	9.0%	9.3%	16.7%	31.9%
Hispanic						
Low (0-49% AMI)	49.2%	30.7%	31.5%	38.1%	19.3%	31.2%
Moderate (50-79% AMI)	57.5%	47.4%	21.7%	23.8%	20.8%	28.8%
Middle (80-119% AMI)	62.0%	58.8%	18.4%	15.4%	19.6%	25.8%
Upper (≥120% AMI)	63.1%	61.7%	16.2%	13.5%	20.7%	24.8%
Unknown/NA	68.9%	50.0%	12.7%	14.2%	18.4%	35.8%
Asian						
Low (0-49% AMI)	47.4%	31.5%	34.6%	38.5%	17.9%	30.0%
Moderate (50-79% AMI)	58.7%	51.7%	22.3%	22.7%	19.0%	25.6%
Middle (80-119% AMI)	66.5%	58.8%	15.3%	16.5%	18.2%	24.7%
Upper (≥120% AMI)	70.0%	63.7%	12.4%	12.0%	17.6%	24.3%
Unknown/NA	72.2%	48.8%	10.0%	12.3%	17.8%	38.9%

Note: Local jurisdiction data can be found in Appendix B.

Source: www.lendingpatterns.com, 2020.

LOCAL DATA AND KNOWLEDGE

Data was collected as part of the preparation of the AI, and was summarized in Appendix A, Public Outreach Summary Report. The outreach was centered around Impediments to Fair Housing Choice. The Outreach consisted of interviews with Stakeholders and Service Providers as well as six community workshops. The outreach report is available online: https://www.sandiego.gov/sites/default/files/fhaifinal2020_appa_outreachreport.pdf

One of the key concerns identified through the Public Outreach was the “inadequate supply of housing in San Diego County”, which impacts “low-income households, large families, and households of color” (Page, A-2). Additionally “finding and accessing information about what housing is available, services, programs, and Fair Housing laws and regulations can be difficult and confusing” (Page, A-2).

Stakeholder interviews found the most common barriers to housing included language, financial burdens related to security deposits and credit checks, housing affordability, technology as many seniors and low-income residents do not have access to computers, transportation to and from service providers that can help with housing, awareness of services that are available to assist, and poor quality of housing.

Community workshops found that the most common barriers to housing were, accessing information, lack of transparency in the process, language, availability and affordability. Additionally, respondents found the barriers are often layered race, gender, and language.

OTHER RELEVANT FACTORS

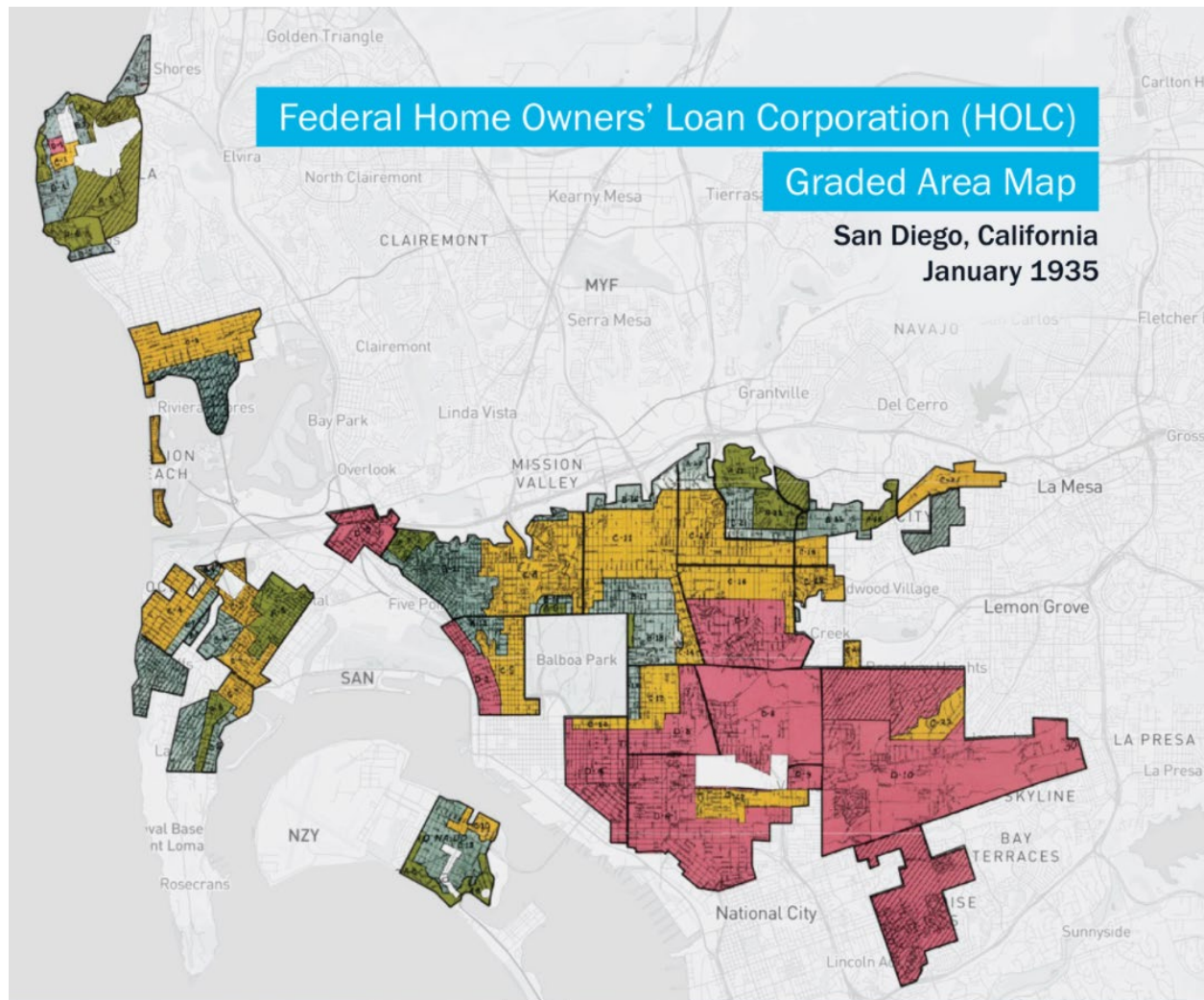
White Flight

Housing patterns in the City of San Diego were influenced by “white flight” as many other urban areas in the United States. According to, “The Other Side of the Freeway”, during the late 1800s Black and Mexican Americans were living near San Diego’s downtown and closer to the waterfront. Just to the south and east of downtown Logan Heights and Golden Hill began to develop with new housing and was considered desirable places to live. Though by the 1920’s streetcar lines were extended north and east of downtown opening up areas even further from the downtown areas for housing. With the addition of the automobile, many whites were able to move out of the older housing closer to downtown into newer housing developing to the north and east. Many of the older housing units that were abandoned by whites in southeast San Diego began to be occupied by black tenants. Once black tenants began to move into these areas, remaining whites refused to stay. Whites moved to new housing away from the older housing stock, opening up more vacancy in the southeastern areas of San Diego. The result was the creation of majority black neighborhoods that were considered undesirable and then redlined by the government’s Home Owners’ Loan Corporation (HOLC).

Redlining in San Diego

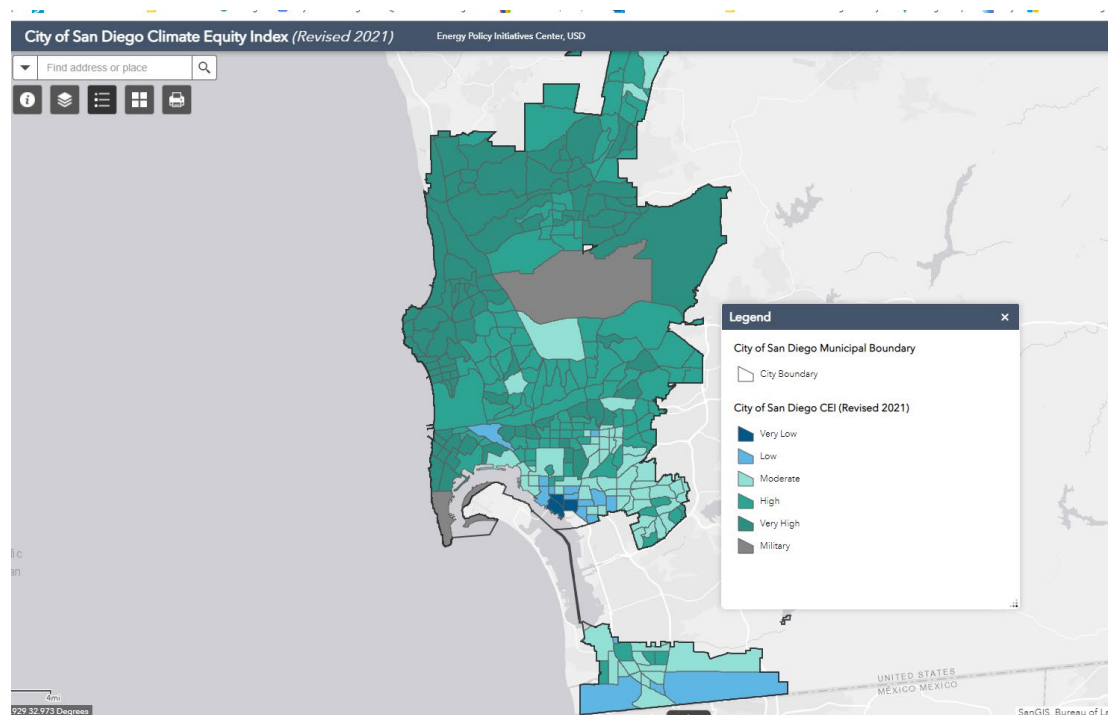
From 1935 to 1940, the HOLC participated in discriminatory practices to systematically deny people of color and the areas they were living in from obtaining mortgages. This practice has shaped the way San Diego developed and its effects are still visible today. The HOLC created redlining maps where the most undesirable areas were given a “D” rating. “D” areas were “characterized by detrimental influences in a pronounced degree, undesirable population or an infiltration of it” HOLC further recommended lenders “refuse to make loans in these areas [or] only on a conservative basis.”

Figure A-28: Federal Home Owners' Loan Corporation (HOLC) Graded Area Map, San Diego, California, January 1935



The areas that were redlined by HOLC, from 1935 -1940 are many of the same areas of San Diego that still lack opportunity as defined by the City of San Diego's Climate Equity Index (Figure A-29). The Climate Equity Index identified Communities of Concern (CoCs). CoCs as defined as communities with very low and low access to opportunity. A total of 35 indicators were used in the analysis to define CoCs and they fall into environmental, socioeconomic, housing, mobility, and health categories. The Climate Equity Index Report found that 125 census tracts within the City show very low to moderate access to opportunity. Specifically, 13 census tracts with the least access to opportunity are Barrio Logan, Lincoln Park, Nestor, the Tijuana River Valley, Logan Heights, Palm City, Mountain View, Stockton, Grant Hill, Southcrest, Teralta East and Shelltown. With those 13 census tracts, 96% of residents identify as people of color. Additionally, within the 48 census tracts with low access to opportunity, 81% identify as people of color.

Figure A-29: City of San Diego Climate Equity Index Map, 2021



The City of San Diego is aware of the discriminatory practices of the past as well as the inequities that exist among the communities located generally in the south eastern areas of the City. In an effort to address the inequities such as the lack of infrastructure, parks, mobility choices, and housing choices, the City of San Diego's Complete Communities initiatives, include provisions to direct funds into Communities of Concern (CoCs).

The Complete Communities initiatives include Housing Solutions, Mobility Choices, Play Everywhere, and Infrastructure Now. Housing Solutions and Mobility Choices have been adopted and include fees that are directed into CoCs. With the adoption of Housing Solutions, a Neighborhood Enhancement In-Lieu Fee (NEF) was adopted. If an applicant chooses to participate in the Housing Solutions' incentive program the NEF is required. The NEF funds affordable housing preservation, neighborhood recreation amenities, active transportation, and transit infrastructure projects within Transit Priority Areas. Further, in recognition of the inequities that exist 50 percent of funds are to be used for affordable housing preservation activities and least 50 percent will be expended in CoCs. Mobility Choices has also been adopted and provides more mobility options to San Diegans to commute and recreate by streamlining development in areas of the City that are most aligned with the City's climate goals and by investing in active transportation infrastructure, such as pedestrian and bicycle facilities. For certain development, an Active Transportation In-Lieu fee will be collected and 50 percent of the funds collected will be used in CoCs to fund active transportation and VMT- reducing infrastructure projects.

The Play Everywhere initiative, has not yet been adopted, though it acknowledges historical inequities in the City's parks system experienced by people who live in CoCs and promotes equal access to enjoy the many physical and social benefits public parks and recreation services. Under the new Parks

Master Plan recommendations, future park investments will be prioritized in the areas where the needs are the greatest including Communities of Concern, park deficient communities and communities experiencing the most growth. This will ensure that our CoCs will also have access to improved park amenities.

The Infrastructure Now initiative is a modernized funding structure that will enable faster and more efficient delivery of public facilities and infrastructure across all communities. Currently the City sets and collects fees on a community planning level. This method results in inequitable investments throughout the City. While infrastructure is used across communities and is available for everyone, fees are geographically restricted which results in delays and/or the inability to fully fund projects, especially in our CoCs. Infrastructure Now will establish a standard citywide development impact fee across the entire City allowing the City to deliver needed infrastructure faster with access to a larger pool of funds. The new method also allows the City to prioritize the greatest needs across the City, thereby creating a more equitable system. The areas that are in most need to improved infrastructure are generally our CoCs and they will benefit from the new fee structure.

CONCLUSIONS, SUMMARY OF ISSUES, AND CONTRIBUTING FACTORS

Racially and Ethnically Concentrated Areas of Poverty are found in the City of San Diego, as evidenced by the City's Climate Equity Index, the TCAC Area of High Segregation and Poverty Map, and the TCAC Opportunity Areas (2021) Map. These maps generally reflect the redlining maps from the 1930's, indicating that the redlining has made a lasting impression on the San Diego landscape.

The San Diego Regional Analysis of Impediments to Fair Housing Choice 2020 report found that Hispanic and Black people have a higher percentage of the population that is living below the poverty line in San Diego County than White people. Additionally, the majority of owner-occupied households in San Diego County are White. When the percentage of White owner-occupied households are compared with the race data in the County, the data shows that minorities are underrepresented in terms of homeownership. When the mortgage lending was analyzed as part of the AI, white loan applicants were overrepresented in the County while Hispanics were underrepresented. This finding indicates that mortgage lending is not equal for individuals in San Diego County. Loan approval rates reveal that white applicants at all income levels had the highest approval rates. While approval rates for Black and Hispanic applicants were well below Whites and Asians in the same income groups. Additionally, Black applicants consistently had the lowest approval rates when compared to other ethnic groups with the same income.

The City of San Diego recognizes the inequities that exist within the City's boundaries as it relates to the lives of its residents. In order to address the inequities that exist the City of San Diego has developed the Complete Communities initiatives to provide additional funding to Communities of Concern for housing, infrastructure, park improvements, and active transportation improvements.

ACCESS TO OPPORTUNITY

Access to opportunity is a concept to approximate place-based characteristics linked to critical life outcomes. Access to opportunity oftentimes means both improving the quality of life for disabled residents and residents of low-income communities, as well as supporting mobility and access to 'high resource' neighborhoods. This encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food and healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions).

Providing a more complete understanding of what types of disparities in access to opportunity exist for what populations and in what geographies is necessary to identify and prioritize contributing factors to fair housing issues and formulation of goals and actions to address those factors. This section will first evaluate access to opportunity for residents generally, followed by an evaluation of access to opportunity for persons with disabilities specifically.

ACCESS TO OPPORTUNITY - GENERAL

REGIONAL AND LOCAL PATTERNS AND TRENDS

The following section address regional and local patterns and trends related to access to opportunity for protected classes. When discussing regional, county-wide patterns and trends, much of the following information has been pulled directly from the San Diego Regional Analysis of Impediments to Fair Housing Choice (SDAI), published in August 2020 and prepared on behalf of the San Diego Regional Alliance for Fair Housing.

The City of San Diego's disparities in access to opportunity are a result of regional segregation of communities and schools; a transportation system that does not meet the needs of low income users; job centers located away from population centers, especially low income and RECAP communities; and governmental and private actions that have resulted in environmental hazards that disproportionately impact lower income residents and people of color.

The SDAI documented disparities in access to opportunity County-wide and for each jurisdiction within the County. To do this, the SDAI compiled index scores provided by HUD "for the purpose of fair housing assessment to help inform communities about disparities in access to opportunity. HUD-provided index scores are based on nationally available data sources and assess residents' access to key opportunity assets in San Diego County."

Table A-9, which is excerpted from Table 52 in the SDAI, "provides index scores or values (the values range from zero to 100) for the following opportunity indicator indices:

- **Low Poverty Index:** The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. *The higher the score, the less exposure to poverty in a neighborhood.*

- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high performing elementary schools nearby and which are near lower performing elementary schools. *The higher the score, the higher the school system quality is in a neighborhood.*
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. *The higher the score, the higher the labor force participation and human capital in a neighborhood.*
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a three-person single-parent family with income at 50% of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). *The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.*
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a three-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. *The higher the index, the lower the cost of transportation in that neighborhood.*
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. *The higher the index value, the better the access to employment opportunities for residents in a neighborhood.*
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. *The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group."*

The analysis in the SDAI concludes that, "in San Diego County, Native American, Black, and Hispanic residents were more likely (compared to other racial/ethnic groups) to be impacted by poverty, limited access to proficient schools, lower labor participation rate. Black residents were most likely to reside in areas with the lowest environmental quality levels, the lowest accessibility to employment centers, and the lowest cost of transportation. Black and Asian residents scored highest as most likely to utilize public transportation."

Table A-9: Opportunity Indicators by Race/Ethnicity of the County of San Diego and City of San Diego*

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
San Diego County							
Total Population							
White, Non-Hispanic	61.91	64.61	48.93	70.89	55.42	52.89	54.81
Black, Non-Hispanic	51.74	53.72	35.21	78.11	63.07	49.79	43.66
Hispanic	51.71	53.49	37.87	75.68	60.19	51.28	47.15

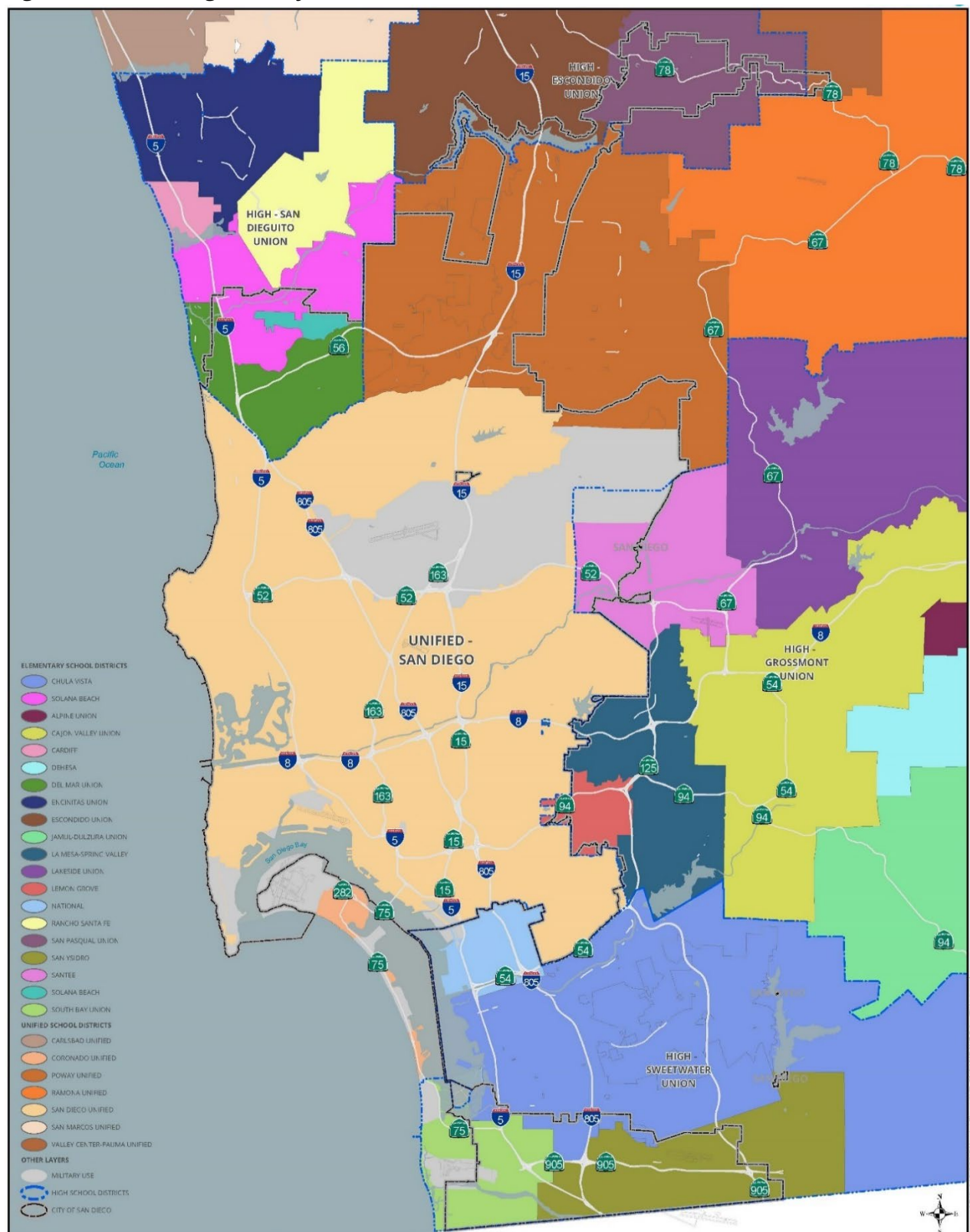
	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Asian or Pacific Islander, Non-Hispanic	65.75	64.96	55.06	78.19	59.63	51.68	47.98
Native American, Non-Hispanic	50.41	48.00	31.93	54.60	47.68	56.76	67.85
Population Below Federal Poverty Line							
White, Non-Hispanic	51.94	58.45	41.93	72.79	58.18	52.36	51.65
Black, Non-Hispanic	42.16	42.08	33.28	86.15	69.30	48.05	36.75
Hispanic	39.99	46.71	32.57	79.68	65.00	48.70	42.87
Asian or Pacific Islander, Non-Hispanic	60.01	60.14	48.58	75.21	59.26	51.72	50.68
Native American, Non-Hispanic	45.10	37.12	34.42	64.82	54.52	51.65	57.91
City of San Diego							
Total Population							
White, Non-Hispanic	67.86	67.39	75.24	89.49	74.41	53.52	43.16
Black, Non-Hispanic	42.82	43.19	40.74	88.67	76.29	44.98	34.94
Hispanic	38.13	40.65	39.45	89.92	76.98	44.50	31.79
Asian or Pacific Islander, Non-Hispanic	62.52	60.38	63.70	90.04	72.16	45.25	43.20
Native American, Non-Hispanic	56.84	55.62	58.86	87.99	77.15	52.11	36.63
Population Below Federal Poverty Line							
White, Non-Hispanic	57.16	60.31	68.63	91.72	79.98	55.53	37.76
Black, Non-Hispanic	28.86	37.40	32.76	92.71	81.27	45.64	28.50
Hispanic	25.68	36.41	31.20	91.36	80.07	43.14	28.27
Asian or Pacific Islander, Non-Hispanic	56.10	57.91	62.52	92.72	80.36	50.92	37.26
Native American, Non-Hispanic	31.81	52.90	52.98	93.31	86.59	54.09	26.11
*Data Excerpted from San Diego Regional Analysis of Impediments to Fair Housing Choice, August 2020							

While these trends have led to limited access for many residents, efforts are underway to improve the transportation network to connect residents to jobs and community plan and zoning changes are allowing more housing in areas of high opportunity.

Education

Examination of data regarding school performance reveals that access to education is segregated along similar lines as access to housing. Public schools within San Diego County are grouped by 23 elementary school districts, six high school districts, 13 unified school districts, and five community college districts. The San Diego County Office of Education provides a variety of services for these 42 school districts, 139 charter schools, and five community college districts in the county. Figure A-30 shows the location of school districts within San Diego County.

Figure A-30: San Diego County School District Boundaries



Regional Patterns and Trends

The 2020 SDAI states that, “As part of President Johnson’s ‘War on Poverty,’ the Elementary and Secondary Education Act (ESEA), passed in 1965. The ESEA is often regarded as the most far-reaching federal legislation affecting education ever passed by Congress. The act is an extensive statute that funds primary and secondary education, while emphasizing equal access to education and establishing high standards and accountability. A major component of ESEA is a series of programs typically referred to as “Title I”. Title I provides financial assistance to states and school districts to meet the needs of educationally at-risk students. To qualify as a Title I school, a campus typically must have around 40 percent or more of its students coming from families who are low-income. The goal of Title I is to provide extra instructional services and activities which support students identified as failing or most at risk of failing the state’s challenging performance standards in mathematics, reading, and writing.”

Figures A-31 and A-32, taken from the SDAI, shows the location of Title I schools in San Diego County. The SDAI notes that, “While Title I schools are not located in all cities and communities, the geographic distribution of Title I schools generally matches the geographic distribution of minorities and low- and moderate-income persons in the county. Addressing access to higher achieving schools is important, as studies have shown that low-income children who live in low-poverty neighborhoods and consistently attend high-quality schools perform significantly better academically than those who do not.”

Figure A-31: Distribution of Title I Schools and Low- and Moderate-Income Areas
(Figure Captured from SDAI)

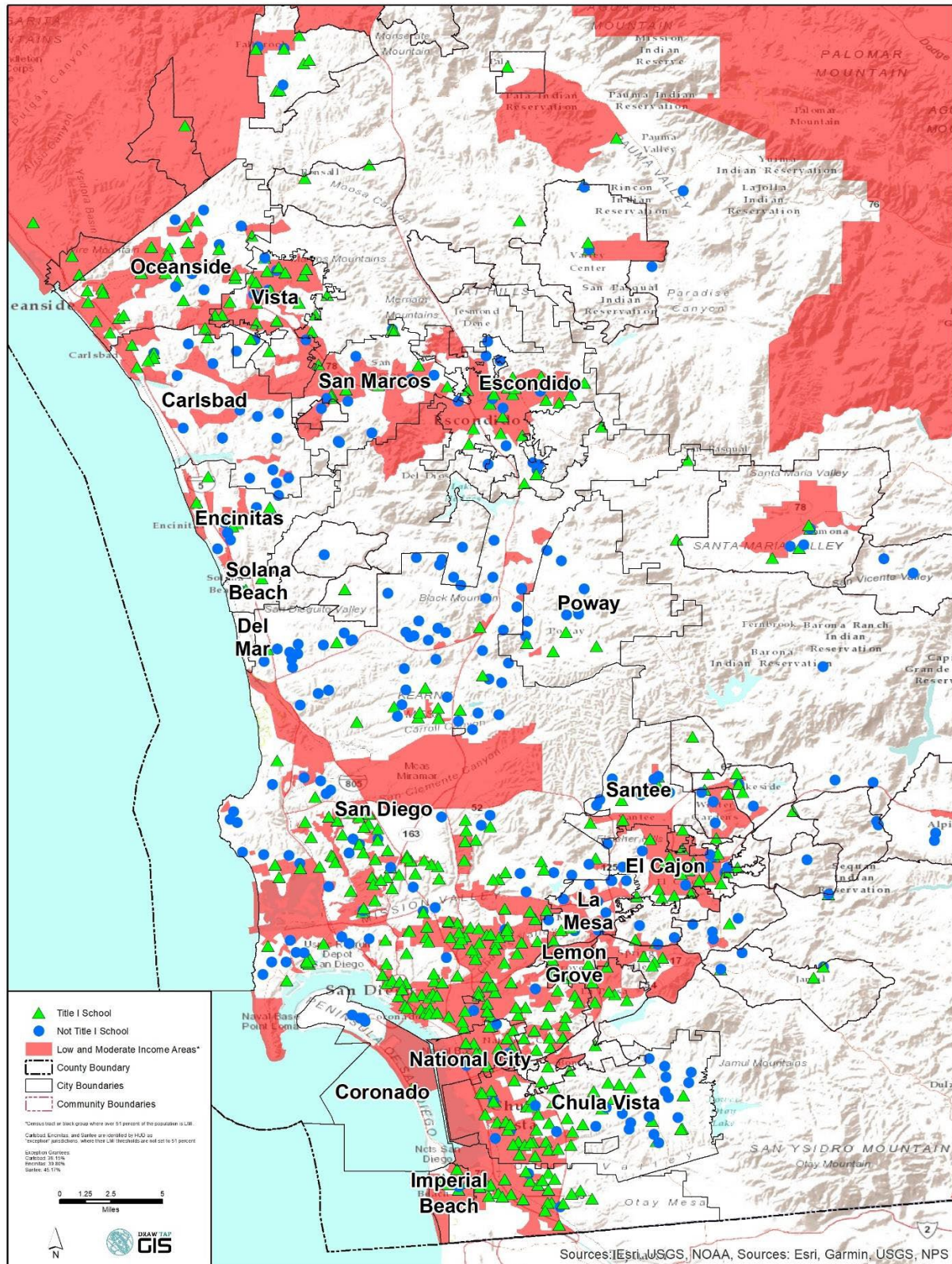
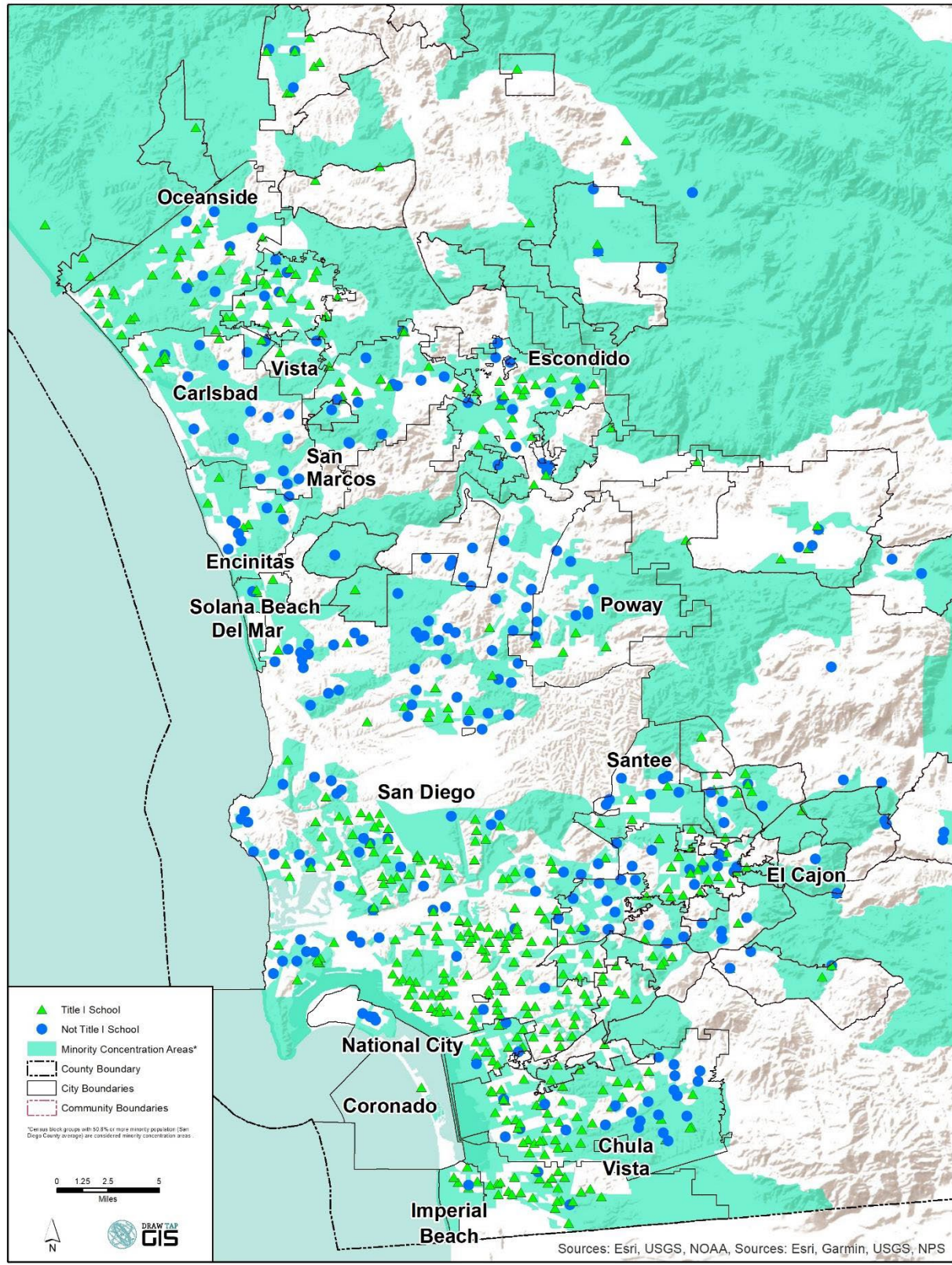


Figure A-32: Distribution of Title I Schools and Areas of Minority Concentration Area
(Figure Captured from SDAI)



Local Patterns and Trends

Consistent with County-wide data, Title I schools within the boundaries of the City of San Diego are more commonly found within lower income communities and communities with higher concentrations of minority populations. Table A-10 provides a closer look at the SDAI Opportunity Indicators table as it relates to school proficiency. Higher proficiency scores (indicating higher school system quality) are found in White, non-Hispanic neighborhoods and to a lesser degree Asian American and Pacific Islander (AAPI) neighborhoods. Neighborhoods with predominantly Black or Hispanic populations have a significantly lower school proficiency score. Schools within neighborhoods at or below the federal poverty line have even lower proficiency scores across all demographics. When compared to the County of San Diego as a whole, school proficiency scores for schools within the City of San Diego are typically higher in predominantly White, non-Hispanic neighborhoods and lower in predominantly Black, Hispanic, AAPI and Native American neighborhoods, sometimes by more than 10 points.

Table A-10: School Proficiency Index for the County of San Diego and City of San Diego*

(The higher the score, the higher the school system quality is in a neighborhood)

	School Proficiency Index for the City of San Diego	School Proficiency Index in the County of San Diego
Total Population		
White, Non-Hispanic	67.39	64.61
Black, Non-Hispanic	43.19	53.72
Hispanic	40.65	53.49
Asian or Pacific Islander, Non-Hispanic	60.38	64.96
Native American, Non-Hispanic	55.62	48.00
Population Below Federal Poverty Line		
White, Non-Hispanic	60.31	58.45
Black, Non-Hispanic	37.40	42.08
Hispanic	36.41	46.71
Asian or Pacific Islander, Non-Hispanic	57.91	60.14
Native American, Non-Hispanic	52.90	37.12
*Data Excerpted from San Diego Regional Analysis of Impediments to Fair Housing Choice, August 2020		

Additionally, examination of math scores and English Language Arts Standards are higher in places where fewer low-income residents live, as shown in Figure A-33 and Figure A-34, respectively (source: Voice of San Diego “A Parent’s Guide to Public Schools 2020”).

A map of Mexico displaying two layers of data. The background layer shows the percentage of the low to moderate income population by state, color-coded from light pink (< 25%) to dark red (75% - 100%). Overlaid on this are numerous colored circles representing math scores at various locations. A legend titled 'Math Scores' indicates five categories: Very High (light blue), High (dark blue), Medium (yellow-green), Low (orange), and Very Low (red). A black outline delineates a specific region in central Mexico. The Gulf of Mexico is visible to the east, and the border with Guatemala is at the bottom. Source information is provided at the bottom left, and the GIS user community logo is at the bottom right.

[illegible]

Transportation and Employment

As noted in the SDAI, “Having access to quality jobs and effective public transportation helps facilitate a good quality of life and improved life outcomes. Unfortunately, research has shown that racial and ethnic minorities, individuals with disabilities, and other protected classes often have restricted access to these vital amenities.

“Access to public transit is of paramount importance to households affected by low incomes and rising housing prices. Public transit should strive to link lower income persons, who are often transit dependent, to major employers where job opportunities exist. Access to employment via public transportation can reduce welfare usage and increase housing mobility, which enables residents to locate housing outside of traditionally low-income neighborhoods. The lack of a relationship between public transit, employment opportunities, and affordable housing may impede fair housing choice. Persons who depend on public transit may have limited choices regarding places to live. In addition, seniors and disabled persons also often rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Public transit that provides a link between job opportunities, public services, and affordable housing helps to ensure that transit-dependent residents have adequate opportunity to access housing, services, and jobs.”

Regional Patterns and Trends

According to SANDAG’s Social Equity Analysis for Draft San Diego Forward: The 2021 Regional Plan (Regional Plan), 11.8 percent of low-income residents, 10.4% of minorities, and 8.0% of seniors in the region live within 0.5 miles of high-quality transit.

Transit use to employment centers is used by these residents when it is available. According to SANDAG, in Downtown San Diego, which is accessible by light rail and rapid bus service, 23% of employees take transit to get to work, while 58% drive alone. Downtown San Diego jobs are primarily lower wage jobs in food services, local government, accommodations, and professional, scientific, & technical services.

Conversely, in the largest employment center in San Diego, Sorrento Valley, employees work in higher paying, technology and university jobs, earning significantly more than employees in Downtown San Diego. The area is only served by bus, which only 4% of employees use. 82% of employees drive alone to work in this area.

SANDAG also shows the time disparity between commute modes. The mean trip time for employees who drive into Downtown San Diego is 24.4 minutes during peak commute times, while a trip by transit takes 52.3 minutes. Similarly, the mean trip time for employees who drive to Sorrento Valley is 31.6 minutes, while a commute by transit takes 77.4 minutes. This disparity affects lower-income residents who rely on transit for their commute as their commute times are double those who can afford to drive a car.

In order to address these inequities, SANDAG’s Draft 2021 Regional Plan calls for improved transit access in areas with low-income and minority residents and improved commute times by providing transit access to employment centers.

Local Patterns and Trends

Local patterns closely follow the regional patterns, as many low income and minority residents are unable to access jobs in the highest job centers.

To provide for more opportunities, the City has focused its community plan updates in areas with access to jobs and current and future transit amenities. These areas include low-income, segregated communities (San Ysidro, Southeastern and Encanto), local job centers (Mission Valley, Midway-Pacific Highway, Old Town, and Kearny Mesa), and smaller focused updates near transit stations (Grantville, Balboa, and Morena). Each of these plan updates included additional housing densities and streamlined approvals for development. Recently adopted community plans have added over 74,000 new housing units in these communities. Each will provide more opportunities for residents to live near their work, near transit, or both.

Currently, the City is updating community plans in University and Mira Mesa, which includes the Sorrento Valley employment center. The plan updates will continue the trend of allowing for more housing in job centers, and if SANDAG's Regional Plan is adopted, will have improved transit opportunities as well. Figure A-35 shows the location of Community Plan Updates recently completed or in process.

Moving forward, the City is pursuing a number of initiatives to increase access to locations like parks and beaches. The City's Park Master Plan is being prepared with a goal of increase access to parks by walking, biking, and transit.

Completed Efforts Since 2012

- Recent CPU Adoption
- Focused Plan Amendment Adoption

Current Efforts

- CPUs/Specific Plans in Process

Other Map Layers

- Military Use

Environment

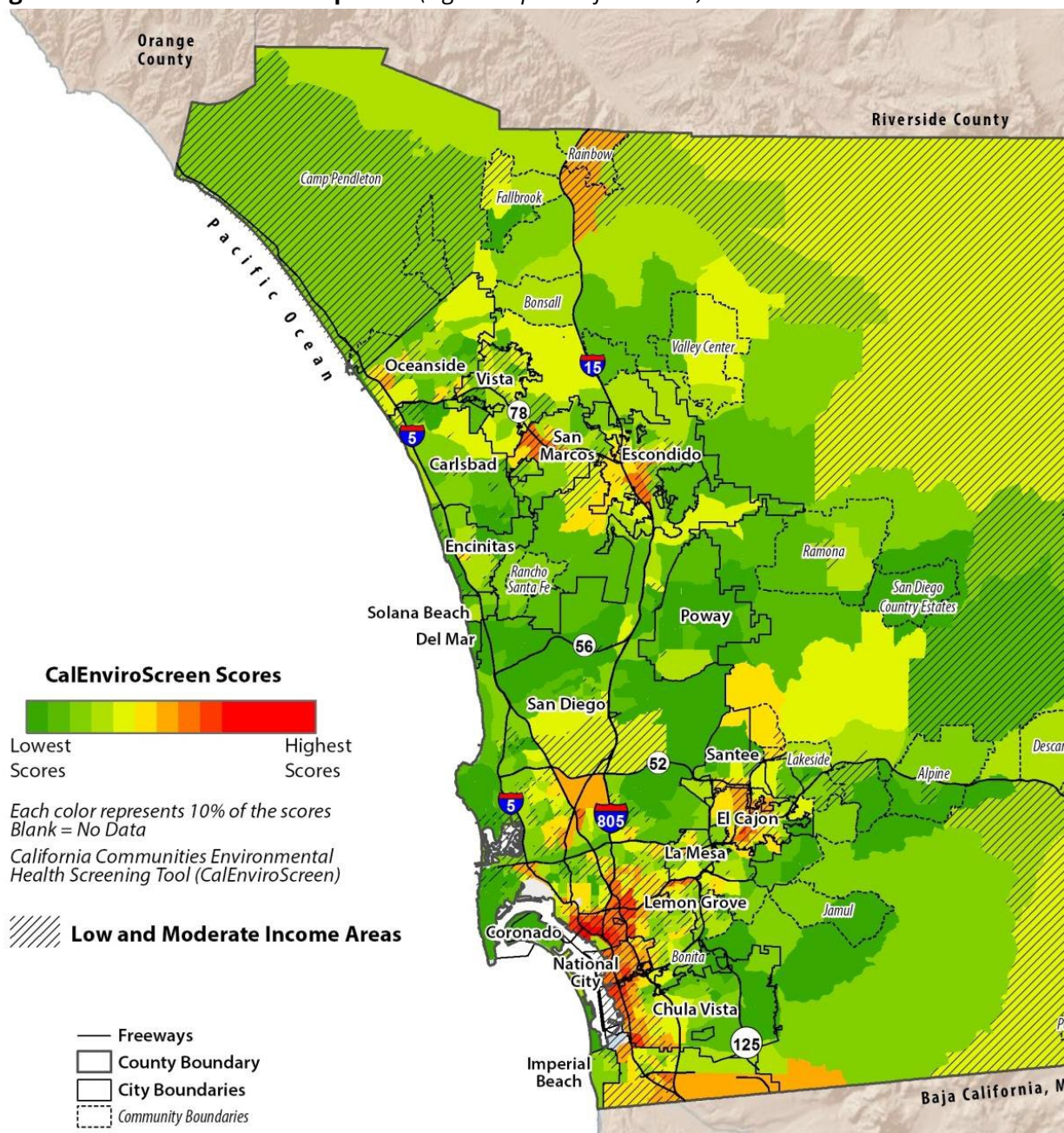
Examination of data regarding the environment and exposure to environmental toxins reveals that exposure is greatest among lower income residents, and in particular lower income people of color. Several factors contribute to this; however, the most significant factors are proximity to freeways and industrial uses which resulted from past public and private actions that ran freeways through existing neighborhoods occupied by lower income residents and people of color and rezoned some of those same residential neighborhoods to mixed use, allowing heavier industrial uses in close proximity to existing homes. A more detailed discussion of these historical events and patterns is provided in the Integration and Segregation section of this appendix. The environmental impacts of these decisions on lower income residents and people of color is discussed below.

Regional Patterns and Trends

The SDAI included regional analysis of environmental health hazards using the Environmental Health Screening tool (CalEnviroScreen). As stated in the SDAI, “The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Research has shown a heightened vulnerability of people of color and lower socioeconomic status to environmental pollutants.”

CalEnviroScreen shows a pattern of greater environmental hazards in low income communities throughout the region. Most areas with wealthier residents and areas of high opportunity do not score high on CalEnviroScreen. Overall, the region does not have the environmental issues in other regions, but the high scoring census tracts align with lower-income, highly segregated communities. Figure A-36, captured from the SDAI, visually illustrates the CalEnviroScreen scores for environmental exposure in relation to low- and moderate-income areas.

Figure A-36: Environmental Exposure (Figure Captured from SDAI)



Local Patterns and Trends

Consistent with County-wide data, neighborhoods with higher exposures to toxins within the boundaries of the City of San Diego are more commonly found within lower income communities and communities with higher concentrations of minority populations. Table A-11 provides a closer look at the SDAI Opportunity Indicators table as it relates to the environmental health index. Higher index values (indicating less exposure to toxins harmful to human health) are found in White, non-Hispanic neighborhoods and Asian American and Pacific Islander (AAPI) neighborhoods. Neighborhoods with

predominantly Black or Hispanic populations have a significantly lower environmental health index score. Neighborhoods with populations predominantly at or below the federal poverty line have even lower environmental health index across all demographics. When compared to the County of San Diego as a whole, environmental health index scores within the City of San Diego are typically lower across all demographics, due to the City's more urban nature and its proximity to the region's freeways and the international border with Mexico.

Table A-11: Environmental Health Index for the County of San Diego and City of San Diego*

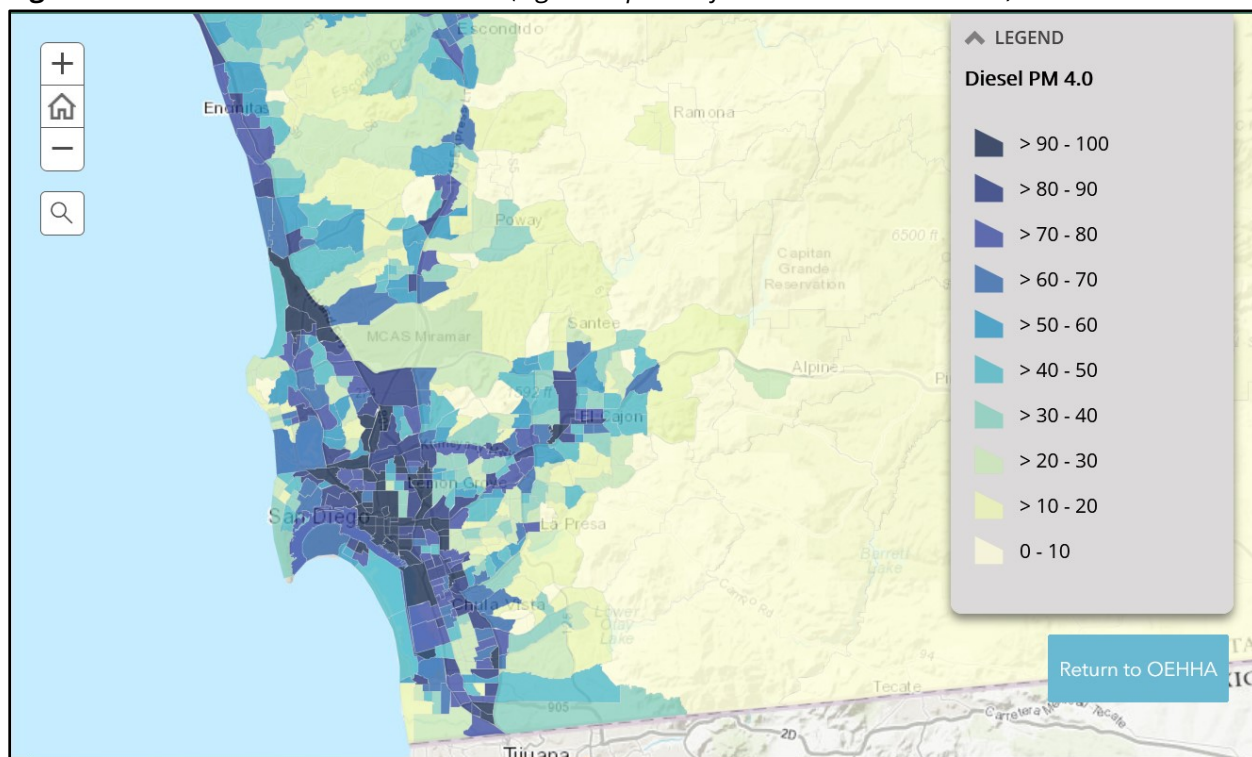
(The higher the index value, the less exposure to toxins harmful to human health. The higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.)

Total Population	Environmental Health Index in the City of San Diego	Environmental Health Index in the County of San Diego
Total Population		
White, Non-Hispanic	43.16	54.81
Black, Non-Hispanic	34.94	43.66
Hispanic	31.79	47.15
Asian or Pacific Islander, Non-Hispanic	43.20	47.98
Native American, Non-Hispanic	36.63	67.85
Population Below Federal Poverty Line		
White, Non-Hispanic	37.76	51.65
Black, Non-Hispanic	28.50	36.75
Hispanic	28.27	42.87
Asian or Pacific Islander, Non-Hispanic	37.26	50.68
Native American, Non-Hispanic	26.11	57.91
*Data Excerpted from San Diego Regional Analysis of Impediments to Fair Housing Choice, August 2020		

Environmental hazards in the City of San Diego are prominent in areas around the Port of San Diego and communities to directly east. Diesel particulate matter and toxic releases are particularly high in these areas, sometimes receiving the highest scores in the State (Figure A-37). The City of San Diego has focused resources in these areas. Additionally, communities along the Mexican border see more environmental impacts than other areas in the region. Goods movement, industrial uses, commuter traffic, and a lack of public improvements affect the environmental quality of these neighborhoods.

The City of San Diego is updating its General Plan to include an Environmental Justice Element that will include policies and guidelines focused on equity in the City's land use planning process and implementation. The Environmental Justice Element will work to ensure that people of all races, cultures and incomes are equally and equitably valued, protected and served by laws, regulations and policies that impact the environment around us, including those about buildings and uses of land, transportation, parks and natural spaces, the urban landscape and city services. The City is also in the process of updating the Barrio Logan Community Plan to address incompatible uses in a neighborhood that scores highest on CalEnviroScreen. Detailed information regarding the history and impact of rezoning and freeway construction within this community is provided in the Integration and Segregation section of this appendix. The Barrio Logan community plan update will assist with future growth and improvements to address environmental quality.

Figure A-37: Diesel Particulate Matter (Figure Captured from CalEnviroScreen 4.0)



The City is also working with SANDAG on developing a regional transportation plan that focuses on transit use, vehicle miles traveled reductions, and a cleaner transportation network regionwide. Focusing on multimodal transportation in heavily trafficked areas and an improved goods movement system can help overcome the environmental challenges facing the region.

LOCAL DATA AND KNOWLEDGE

Preparation of the San Diego Regional Analysis of Impediments to Fair Housing Choice and the City's 2021-2029 Housing Element provided opportunities to hear directly from various stakeholders regarding housing and fair housing choice. These stakeholders included housing professionals, service providers, affordable housing advocates, and general members of the public.

During preparation of the SDAI, stakeholders identified several key issues related to access to opportunity and barriers to housing in the community. These included the large and diverse geographic area of San Diego; language and dialect barriers; access to technology; access to information regarding individual rights related to housing, education, support services; limited hours and route options for public transit; poor quality housing units; and difficulty finding housing for large families, those with low incomes, and individuals with mental and physical disabilities. When asked which protected classes need improved services, stakeholders identified disabled individuals; the LGBTQ+ community; large families; tenants utilizing Section 8 vouchers; seniors and the aging population; those facing religious discrimination; and homeless individuals and families.

During outreach for the 2021-2029 Housing Element, city staff received more than 1,100 comments, had 464 online survey participants, and engaged in-person with nearly 200 San Diegans. Most San Diegans agree that housing affordability and homelessness are urgent concerns that need to be addressed and that a top strategy to solving these issues is improvements to City processes to increase the overall supply of housing, although some respondents expressed concern over impacts of additional housing on things such as parking and water supply.

Below is a summary of some of the questions asked in the online survey and the top two responses to those questions:

- “What is the biggest barrier to affordable housing in the City of San Diego?” (Table F-1)
 - “Cost of quality housing is too high” (33%) and “Low supply of housing” (20%).
- “What is the most urgent housing issue?” (Table F-2)
 - “Affordability” (47%) and “Homelessness” (20%).
- “What is the most pressing issue to finding quality housing in San Diego?” (Table F-9)
 - “Only low-quality housing available in my price range” (38%) and “Low availability of housing where I want to live” (29%).
- “What do you think is the best strategy to produce more housing?” (Table F-13)
 - “Improve City processes” (28%) and “Increase housing supply near transit” (22%).

When provided an opportunity to provide additional, open-ended responses to issues surrounding access to fair housing, stakeholders provided responses that included requiring developers to construct affordable housing on-site rather than pay in-lieu fees; limiting or eliminating short-term vacation rentals to free-up housing stock; improving City permitting processes and reducing fees; the impact of sharp rent increases; encouraging small-lot development and tiny homes; facilitating aging in-place; the need to construct new housing near transit; and implementation of rent control.

OTHER RELEVANT FACTORS

Access to opportunity is an issue not only for lower income residents and people of color, but also for persons with disabilities. A detailed discussion of access to opportunities for persons with disabilities can be found in the next section.

CONCLUSIONS, SUMMARY OF ISSUES, AND CONTRIBUTING FACTORS

Unfortunately, but not surprisingly given a history of discriminatory housing practices, communities with reduced access to opportunity - including quality schools, jobs, transit, and a safe environment - are also communities with higher concentrations of lower income residents and people of color. The discrimination and segregation experienced by these communities (addressed in greater detail in the Integration and Segregation section of this appendix) has had long-lasting effects that continue to impact quality of life and economic mobility. In the City of San Diego, these communities are located

primarily to the southeast of Downtown and the eastern area of the City south of Interstate 8, including portions of Golden Hill, Southeast San Diego, Encanto, Barrio Logan, Mid-City: City Heights, and San Ysidro.

The City of San Diego continues to take action to address barriers to opportunity by amending community plans to increase density along transit corridor and near job centers; incentivizing the construction of accessory dwelling units and deed-restricted affordable dwelling units throughout the City to improve access to quality schools; working with SANDAG to plan and implement transit improvements that connect people to well-paying jobs; implementation of the Climate Action Plan to reduce greenhouse gas emissions and other pollutants; and preparation of the Environmental Justice Element of the General Plan which will guide the City's future planning and development actions to ensure fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

ACCESS TO OPPORTUNITY FOR PERSONS WITH DISABILITIES

Several Federal and State statutes and court decisions work together to articulate and uphold the rights of persons with disabilities. At the federal level, these include the Fair Housing Act (1968), which prohibits discrimination on the basis of disability in all types of housing transactions and defines “persons with a disability” as those individuals with mental or physical impairments that substantially limit one or more major life activities. The Fair Housing Amendments Act (1988) requires local jurisdictions to “make reasonable accommodations in rules, policies, practices, or services when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling.” The Americans with Disabilities Act of 1990 (ADA) prohibits discrimination against people with disabilities in several areas, including employment, transportation, public accommodations, communications and access to state and local government’ programs and services. The U.S. Supreme Court’s 1999 decision in *Olmstead v. L.C. (Olmstead)* found the unjustified segregation of people with disabilities is a form of unlawful discrimination under the Americans with Disabilities Act (ADA). The Court held that states are required to provide community-based services for people with disabilities who would otherwise be entitled to institutional services when: (a) such placement is appropriate; (b) the affected person does not oppose such treatment; and (c) the placement can be reasonably accommodated, taking into account the resources available to the state and the needs of other individuals with disabilities.

At the state level, the Lanterman Act of 1969 established the right to services and supports for people with intellectual and developmental disabilities to enable them to live more independent and normal lives. Before California passed the Lanterman Act, over 13,000 individuals with intellectual and developmental disabilities were housed in large, State-run developmental centers. No home and community-based services were available during this period. Starting in 1996, the State began systematically closing these developmental centers. As an alternative to the developmental centers, and in response to the Lanterman Act, the State, under the Department of Developmental Services (DDS), has developed a system of community-based resources and services delivered through a network of state-funded regional centers. The Rehabilitation Act of 1973, among other things, establishes the Independent Living Services and Centers for Independent Living programs. The purpose is to:

- Promote Independent Living philosophy, based on consumer control, peer support, self-determination, equal access and systems advocacy;
- Maximize the leadership, empowerment, independence and productivity of individuals with significant disabilities; and
- Promote the integration and full inclusions of individuals with significant disabilities into mainstream society.

This assessment of access to housing and opportunities for persons with disabilities draws heavily from the U.S. Census and American Communities Survey, San Diego County Regional Analysis of Impediments to Fair Housing Choice 2020-2025 (SDAI), the State Council on Developmental Disabilities’ Statewide Strategic Framework for Expanding Housing Opportunities for People with Intellectual and Developmental Disabilities (September 2018), the California State Plan for

Independent Living for Fiscal Years 2021-2023 (December 2020), the 2020 San Diego Regional Center Performance Contract Plan, and the 2020-2024 Area Plan for the Aging and Independence Services Division of the County of San Diego's Health and Human Services Agency.

The 2010 Census defines six types of disabilities: sensory, physical, mental, self-care, go-outside-home, and employment. The Census defines sensory and physical disabilities as "long-lasting conditions." Mental, self-care, go-outside-home, and employment disabilities are defined as conditions lasting six months or more that make it difficult to perform certain activities. A more detailed description of each disability type is provided below:

- Sensory: Blindness, deafness, or severe vision or hearing impairment.
- Physical: A condition that substantially limits one or more basic physical activities, such as walking, climbing stairs, reaching, lifting, or carrying.
- Mental: A mental condition lasting more than six months that impairs learning, remembering, or concentrating.
- Self-care: A condition that restricts the ability to dress, bathe, or get around inside the home.
- Go-outside-home: A condition that restricts the ability to go outside the home alone to shop or visit a doctor's office.
- Employment: A condition that restricts the ability to work at a job or business.

The U.S. Census describes a "Cognitive disability" as an intellectual impairment that causes one to have difficulty concentrating, remembering, or making decisions. Cognitive disabilities include mental and emotional conditions, such as an intellectual disability, cerebral palsy, autism, an emotional condition, or another developmental disability which often results in difficulty getting along with other children, doing schoolwork, or making decisions. The California state definition of "Developmental Disability," in Section 4512 of the California Welfare and Institutions Code, is a disability that originates before an individual reaches 18 years of age, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual, which includes intellectual disability, cerebral palsy, epilepsy, and autism.

The U.S. Department of Health and Human Services, Administration on Intellectual and Developmental Disabilities (AIDD) estimates the prevalence of developmental disabilities at 1.58 percent of the general population. According to the 2018 Statewide Strategic Framework for Expanding Housing Opportunities for People with Intellectual and Developmental Disabilities, there are between 338,000 and 629,000 people with Intellectual and Developmental Disabilities (I/DD) living in California, depending on whether you use the State or Federal definition. Over the past decade, this vulnerable population has grown four times faster than the general population.

The State Department of Developmental Services (DDS) currently provides services and support to individuals with developmental disabilities. Individuals who meet the State's definition of developmental disability are eligible for services through DDS and the regional center system. The State Department of Developmental Services (DDS) currently provides services and support to

individuals with developmental disabilities. Services are provided through state-operated developmental centers and community facilities, and contracts with 21 nonprofit regional centers. According to DDS, as of July 2018, approximately 338,000 consumers (meeting the state definition of developmental disability) are being served by the state operated residential and community facilities and the state's system of community-based services. The San Diego Regional Center serves the counties of Imperial and San Diego.

Many persons with developmental disabilities can live and work independently within a conventional housing environment. However, the most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, an important issue in housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult. According to the Statewide Strategic Framework for Expanding Housing Opportunities for People with Intellectual and Developmental Disabilities, most individuals with I/DD are living on minimum wage or fixed SSI/SSP incomes that come out to approximately \$900 per month, which falls into the extremely low income category.

As mentioned above, in the late 1990s the State began closing its development center institutions with the objective to transition services for people with I/DD to a more community integrated model with increased choice and the least restrictive setting as possible. Today, more than 80% of people with I/DD in California live in a family home. However, this achievement has had an unintended consequence: the current housing infrastructure is insufficient to meet the needs of adults with I/DD when their aging caregivers are no longer able to continue to provide the same level of support and housing stability.

LOCAL AND REGIONAL PATTERNS AND TRENDS

Local Patterns and Trends

In 2017, approximately nine percent (122,831) of the City's population had a disability and approximately 31 percent of residents age 65 and older had a disability, as shown in Table A-12. Persons with disabilities living in the City of San Diego experience lower rates of workforce participation and higher rates of unemployment than people in the broader population, as shown in Table A-13, affecting their financial resources. Employment discrimination and regulations regarding earned income and reductions in disability benefits also complicate the financial situation of many people who experience disabilities. Combined with high housing costs and low inventory, the compound challenges faced by disabled individuals can too often include homelessness. In the 2019 Point In Time count of unsheltered persons experiencing homelessness in San Diego County, 36 percent reported having a physical disability. Between the 2015 and 2019 Point In Time counts, percent of unsheltered population age 55 and up increased from 12 percent to 33 percent.

Table A-12. City of San Diego Persons with Disabilities by Type (ACS 2017)

Disability Type	Number	Percent
Total population	1,383,566	
<i>Total population with a disability</i>	122,831	8.9%
Population under 18 years old	282,369	
<i>Population with a disability under 18 years old</i>	10,000	3.5%
<i>Hearing</i>	1,913	0.7%
<i>Vision</i>	2,3834	0.8%
<i>Cognitive</i>	7,079	2.5%
<i>Ambulatory</i>	1,572	0.6%
<i>Self-care</i>	2,486	0.9%
<i>Independent Living</i>	20,413	2.2%
Population 18 to 64 years old	926,542	
<i>Population with a disability 18 to 64 years old</i>	58,264	31.2%
<i>Hearing</i>	9,734	1.1%
<i>Vision</i>	12,332	1.3%
<i>Cognitive</i>	25,188	2.7%
<i>Ambulatory</i>	25,168	2.7%
<i>Self-care</i>	9,517	1.0%
<i>Independent Living</i>	20,413	2.2%
Population over 65 years old	174,655	
<i>Population with a disability over 65 years old</i>	54,567	31.2%
<i>Hearing</i>	22,435	13%
<i>Vision</i>	9,404	5%
<i>Cognitive</i>	15,673	9%
<i>Ambulatory</i>	33,570	19%
<i>Self-care</i>	14,452	8%
<i>Independent Living</i>	25,429	15%

Table A-13. City of San Diego Persons with Disabilities by Employment Status (ACS 2017)

Employment Status	Number	Percent
Total population	1,383,566	
<i>Total persons with a disability</i>	122,831	8.9%
Total employed	690,829	
<i>Employed with a disability</i>	24,463	3.5%
Total unemployed	41,090	
<i>Unemployed with a disability</i>	3,293	8.0%
Total not in labor force	194,623	
<i>Not in labor force with a disability</i>	30,508	15.7%
Persons age 65+	174,655	
<i>Persons age 65+ with a disability</i>	54,567	31.2%

Housing and Independent Living Services

The City and the County of San Diego both administer a wide array of housing programs to assist in the provision of affordable housing for senior households, including funding for acquisition and construction, rehabilitation, rental assistance, and home repair. Fifty-six percent of households with Housing Choice Vouchers, also known as Section 8 vouchers, administered by the San Diego Housing Commission (which serves the City of San Diego) are elderly and/or disabled. The average annual income of households with vouchers is \$19,611. The San Diego Housing Commission (SDHC) also owns, manages, develops, and assists in financing the development and preservation of deed-restricted affordable housing units in the City. While Housing Choice Vouchers and deed-restricted affordable housing units assist many San Diegans with disabilities, the need significantly outmatches the availability as shown in Figure A-38.

Figure A-38: Waiting List Information from San Diego Housing Commission Fiscal Year 2022 Moving to Work Plan

I. WAITING LIST INFORMATION ANTICIPATED			
Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.			
WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN, OR CLOSED
Housing Choice Voucher: Tenant-Based	Community Wide	109,088	Open
Housing Choice Voucher: Project-Based	Site-Based	60,664	Open
Housing Choice Voucher: Project-Based (Single)	Site-Based	0	Closed
Public Housing	Community Wide	85,984	Open
Local Non-Traditional	Community Wide	0	Open

Please describe any duplication of applicants across waiting lists:

Applicants have the opportunity to apply to multiple rental assistance programs and often appear on multiple wait lists. Local Non-Traditional programs utilized the Coordinated Entry System (CES) for waitlist purposes.

In addition to affordable housing, the housing needs of many persons with disabilities include accessible housing. Unfortunately, data sources on housing units by development size (i.e. number of units) and year permitted (in relation to accessibility laws and requirements) are not available or adequate at this time to estimate the number of accessible dwelling units within the City or make a comparison of accessible dwelling units to persons in need of accessible housing. Often, however, deed-restricted affordable housing developments include accessible and/or adaptable housing units. SDHC's housing portfolio provides accessible housing units. In addition, the annual affordable housing resource guide prepared by SDHC which lists affordable units owned and operated by other agencies indicates which affordable developments include accessible units.

Supportive housing, such as intermediate care facilities, group homes, and other housing with a planned service component, is another important type of housing for persons with disabilities. The supportive housing stock, other housing facilities, and day centers in the City of San Diego serving persons with disabilities include the following facilities and capacity, as reported by the State Department of Social Services.

Table A-14. Licensed Care Facilities in the City of San Diego (2021)

Facility Type	Number of Facilities	Total Capacity (Individuals)
<i>24-Hour Residential Care for Children</i>	5	241
Small Family Homes	2	8
Transitional Housing Placement Programs	3	233
<i>Residential Care for the Elderly</i>	195	7,401
Residential Care for the Elderly, License Pending	9	205
Residential Care for the Elderly, Licensed	181	4,723
Continuing Care Retirement Communities, Licensed	5	2,473
<i>Adult Residential Facilities</i>	185	1,075
Social Rehabilitation Facilities, Licensed	5	71
Adult Residential, License Pending	15	66
Adult Residential, Licensed	165	938
<i>Adult Day Programs</i>	13	907
Source: https://www.cclcdss.ca.gov/carefacilitysearch/DownloadData , accessed May 2021		

Figure A-39 shows the locations of licensed care facilities in San Diego County as of 2019. In the City of San Diego clusters of facilities providing residential care for the elderly can be seen in the La Jolla, Pacific Beach, Clairemont, Mira Mesa, and Skyline-Paradise Hills communities. There is a noticeable presence of Adult Residential Facilities in unincorporated areas and inland cities and few in the City of San Diego and coastal areas. Since many Adult Residential Facilities provide housing for 4 to 6 individuals, the rental and ownership cost of housing (Figures A-40 and A-41) and availability of 3+ bedroom rental and ownership homes (Figures A-42 and A-43) may influence the distribution of these facilities. However, as most of the city's hospitals, social service agencies, and Adult Day Programs are located in central San Diego, residents living Adult Residential Facilities likely have to travel a greater distance to access care and support services.

Figure A-39: Licensed Care Facilities (Figure Captured from SDAI)

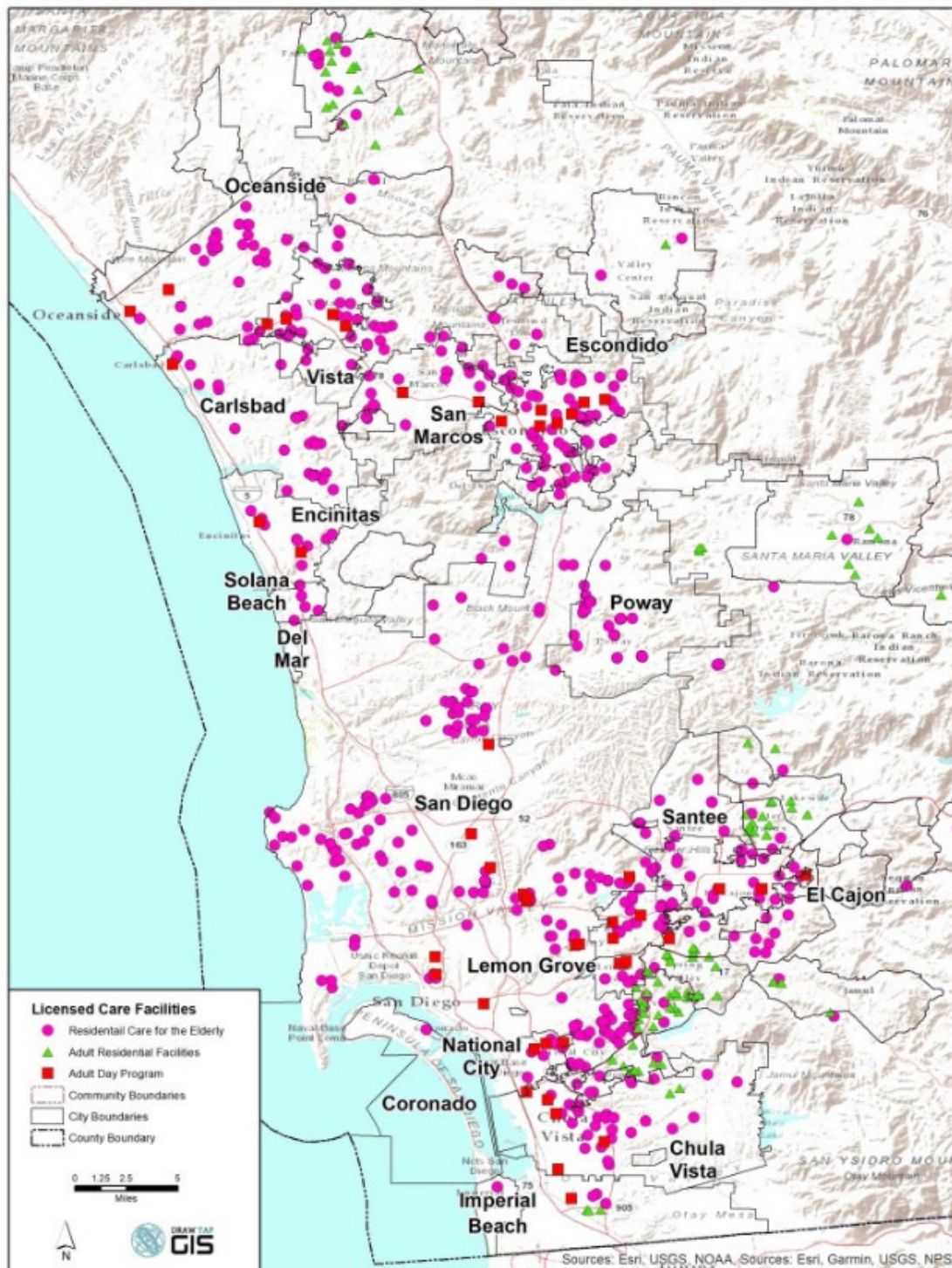


Figure A-40: Median Contract Rent (HUD CPD Maps)

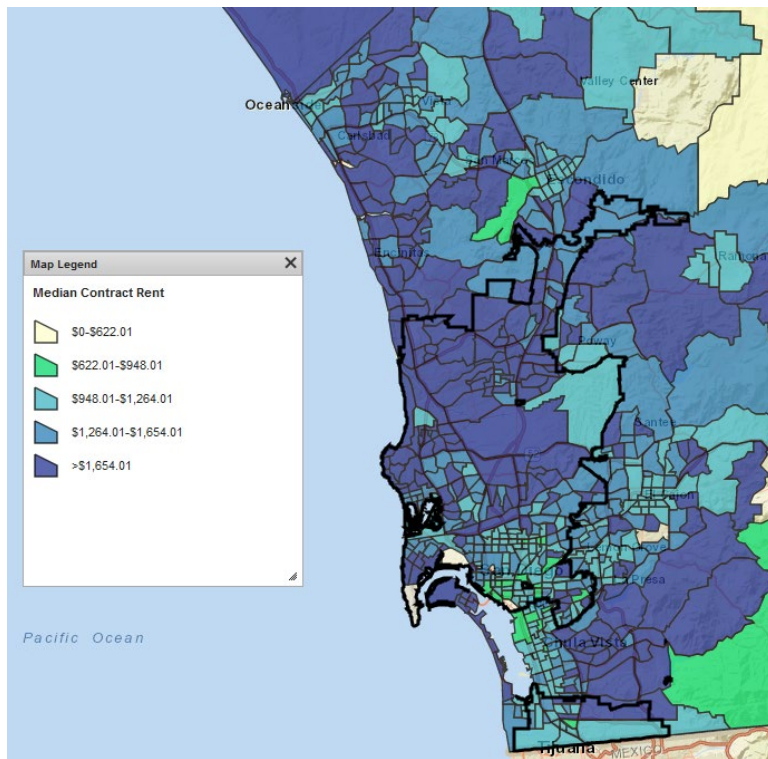


Figure A-41: Median Home Value (HUD CPD Maps)

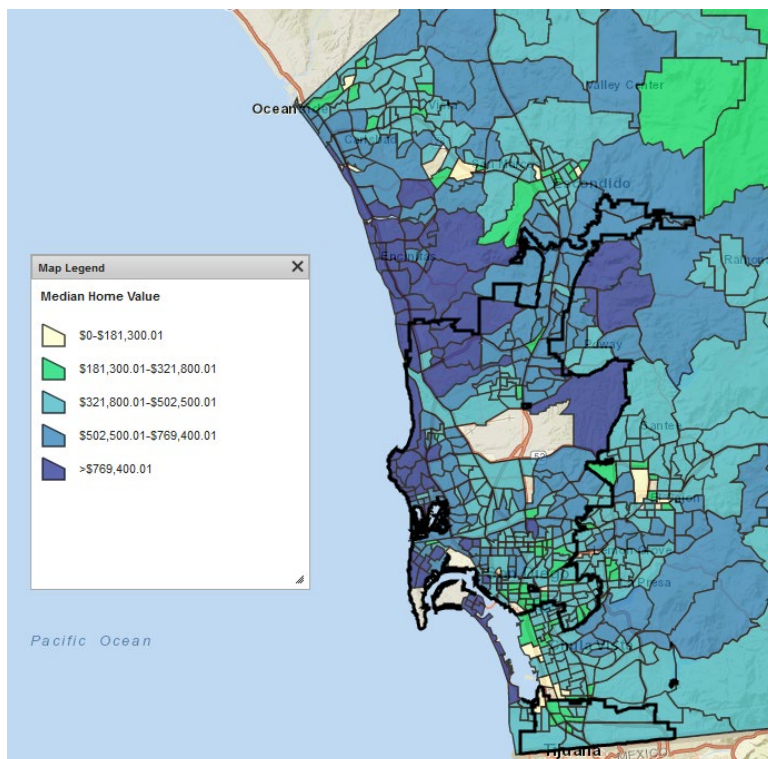


Figure A-42: Percent Renter Units with 3 or More Bedrooms (HUD CPD Maps)

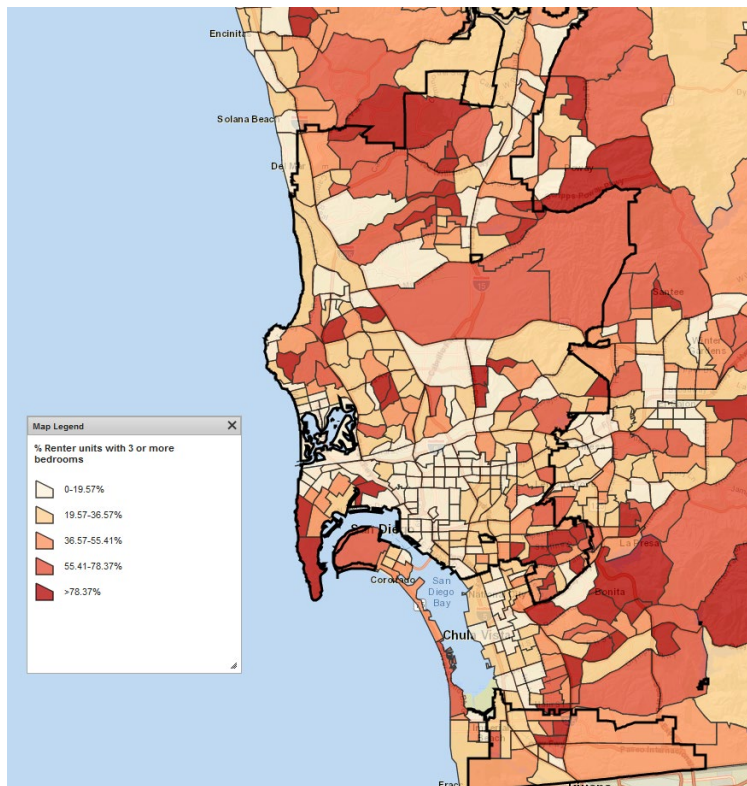
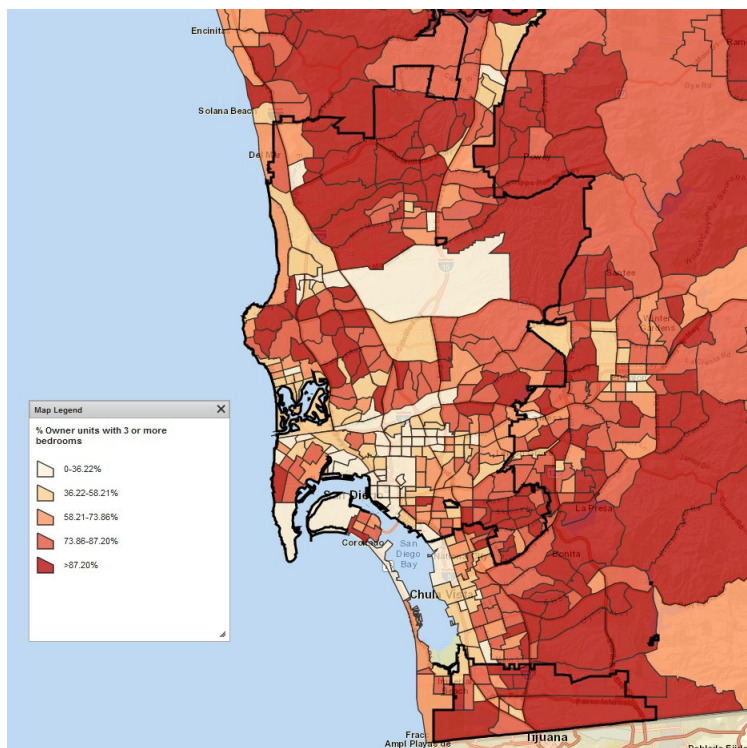


Figure A-43: Percent Owner Units with 3 or More Bedrooms (HUD CPD Maps)



As stated above, 8.9% of the City's population is comprised of individuals with a disability. Of the estimated 122,831 individuals with disabilities in the City, 44.42% are over the age of 65, 47.43% are ages 18 to 64, and 8.14% are under the age of 18. This data is further refined by disability type in Table A-22. Among those under age 64, the largest proportion of disabilities is cognitive. Most of those aged 65 and older have an ambulatory disability. As shown in Figure A-44, within the City of San Diego, persons with disabilities are generally distributed throughout the City, with greater concentrations in some areas which are home to several senior and/or affordable housing developments.

To assess living patterns among city residents with disabilities, the data on persons with disabilities has been separated between disabled persons who are non-elderly (less than 65 years of age) and disabled persons who are elderly (65 years of age or older). Figure A-45 shows the percentage of persons with disabilities who are non-elderly by census tract, and Figure A-46 shows the percentage of persons with disabilities who are elderly by census tract. Adding to this data, Figure A-47 shows median household income (ACS 2015-1029) by census tract. Comparing these three figures, it is apparent that greater percentages of persons with disabilities who are elderly live in census tracts with incomes above the median household income; while there are clusters of non-elderly persons with disabilities in census tracts with incomes below the median household income, which coincide with areas of minority and poverty concentration and RECAPs.

The City's zoning regulations within its Municipal Code are generally supportive of independent and community living. The Municipal Code does not differentiate senior housing or other types of supportive housing from other multiple dwelling unit housing. Multiple dwelling unit housing is allowed in all Residential Multiple Unit zones, all Mixed Use zones, and many Commercial zones that permit residential uses. Permanent supportive housing, which must be covenant-restricted affordable housing, is permitted as a limited use in all Residential Multiple Unit zones, Mixed Use zones, and many Commercial zones that permit residential uses.

Regarding group living facilities, the City's zoning use categories include:

- Residential Care Facilities which include residential and community care facilities, in addition to drug and alcohol rehabilitation and recovery facilities;
- Transitional Housing, defined as offering residential accommodations for a specified period of time, mental health support and counseling services, and other support services to prepare families and individuals for independent living; and
- Continuing Care Retirement Communities, defined as being licensed by the state as both a Residential Care Facility for the Elderly and a Skilled Nursing Facility and providing residents with multiple living environments based on the changing level of care required by the resident.

Some limitations have been placed on the siting of certain types and sizes of group living and care facilities in the form of distance separation requirements and some objective development and/or operational requirements. Residential Care Facilities for 6 or fewer persons and Transitional Housing for 6 or fewer persons are permitted in all residential zones, mixed use zones, and many commercial zones that permit residential uses. Residential care facilities for 7 or more persons are conditionally permitted in all Residential zones, Mixed Use zones, and many Commercial zones that permit

residential uses; proposed facilities for 7 to 12 persons being subject to decision by a Hearing Officer, and proposed facilities for 13 or more persons being subject to decision by the City's Planning Commission. Residential care facilities are not permitted within 1/4 mile of another residential care facility, measured from property line to property line. Transitional housing for 7 or more persons is a permitted as a limited use in all Residential Multiple Unit zones, Mixed Use zones, and many Commercial zones that permit residential uses. Transitional housing for 7 or more persons is conditionally permitted in all Residential Single Unit zones, subject to decision by the City Council.

Accessory Dwelling Units (ADUs), which are detached housing units on sites with existing residential units, and Junior ADUs, which are attached housing units on sites with existing residential units, may also be suitable and more affordable types of housing for persons with disabilities. ADUs are permitted in all Residential zones, as a limited use in Mixed Use zones, and as a limited use in many Commercial zones that permit residential uses. Junior ADUs are allowed in all Residential Single Unit zones.

Figure A-44. Distribution of Persons with Disabilities in the City of San Diego (AFFH Data Viewer)

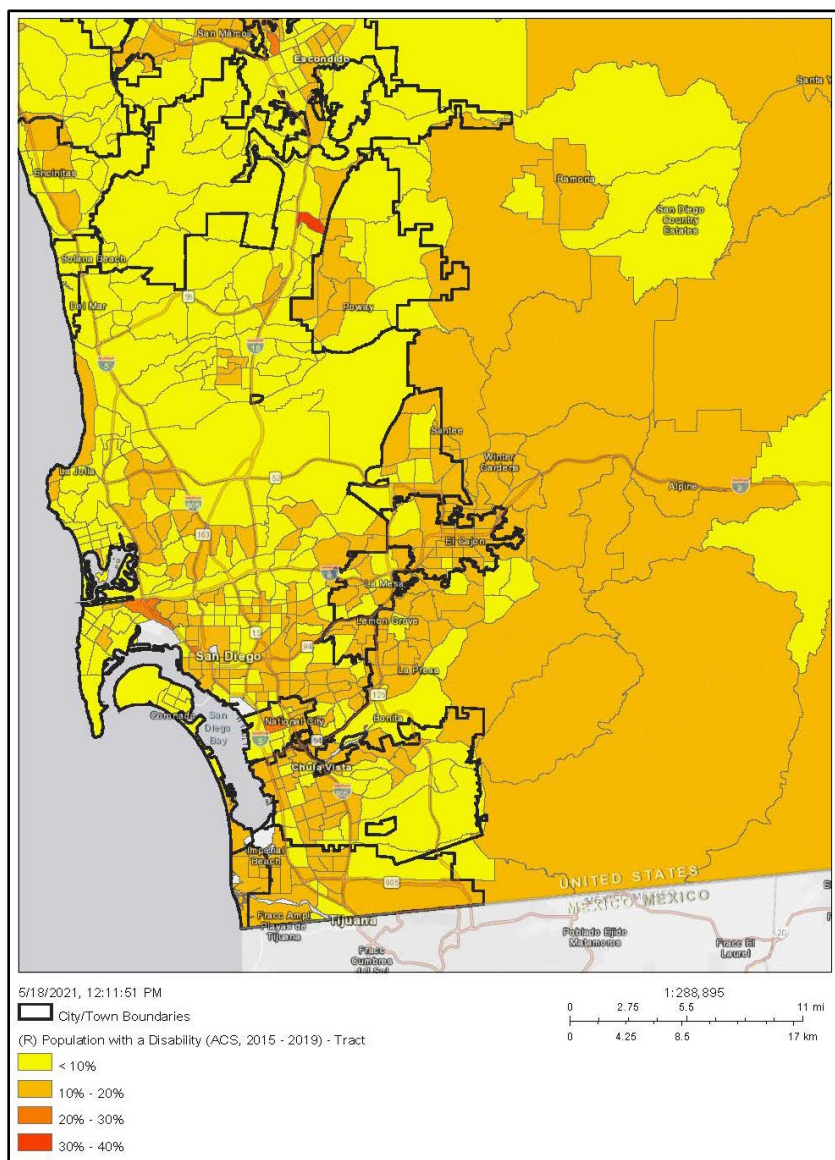
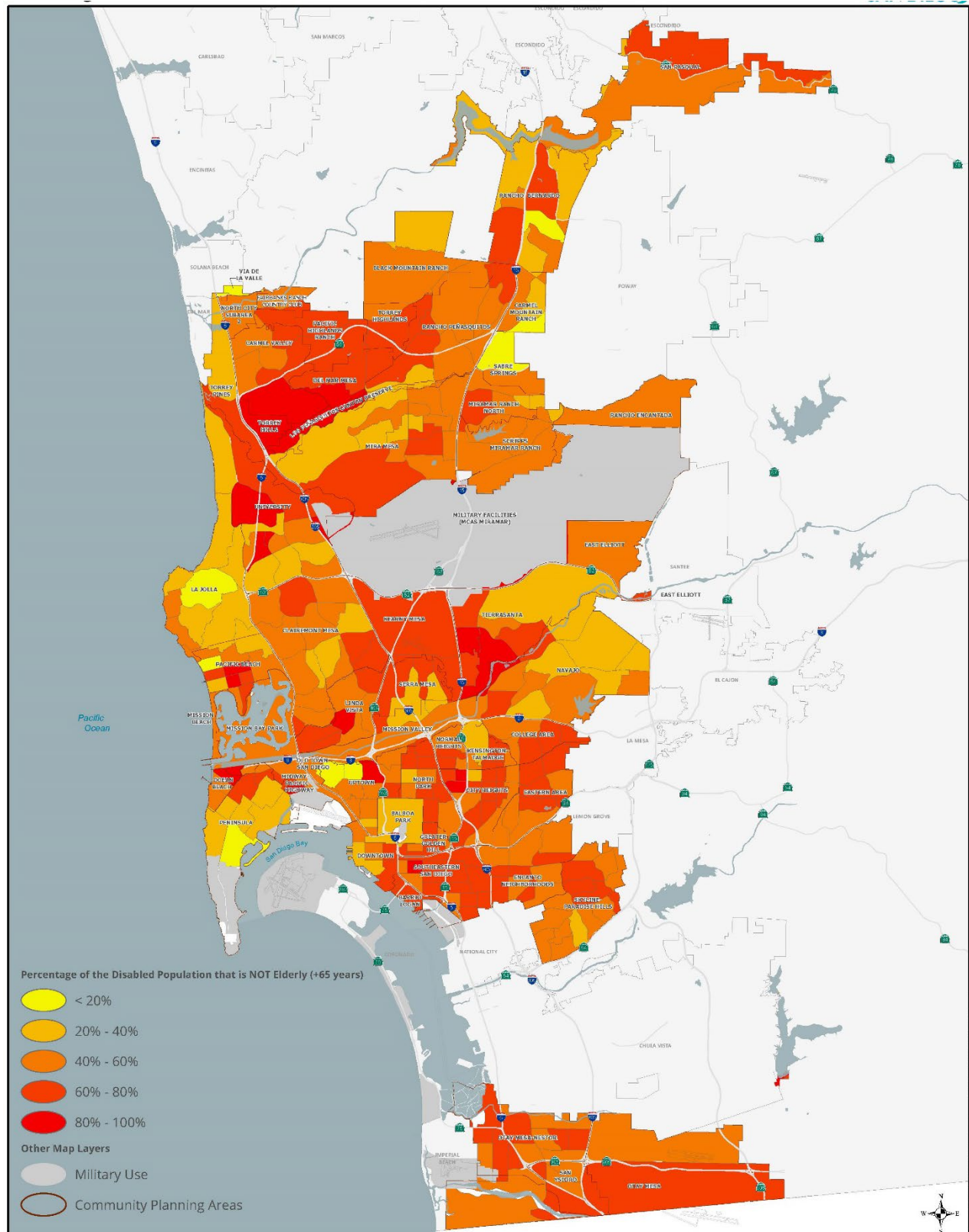
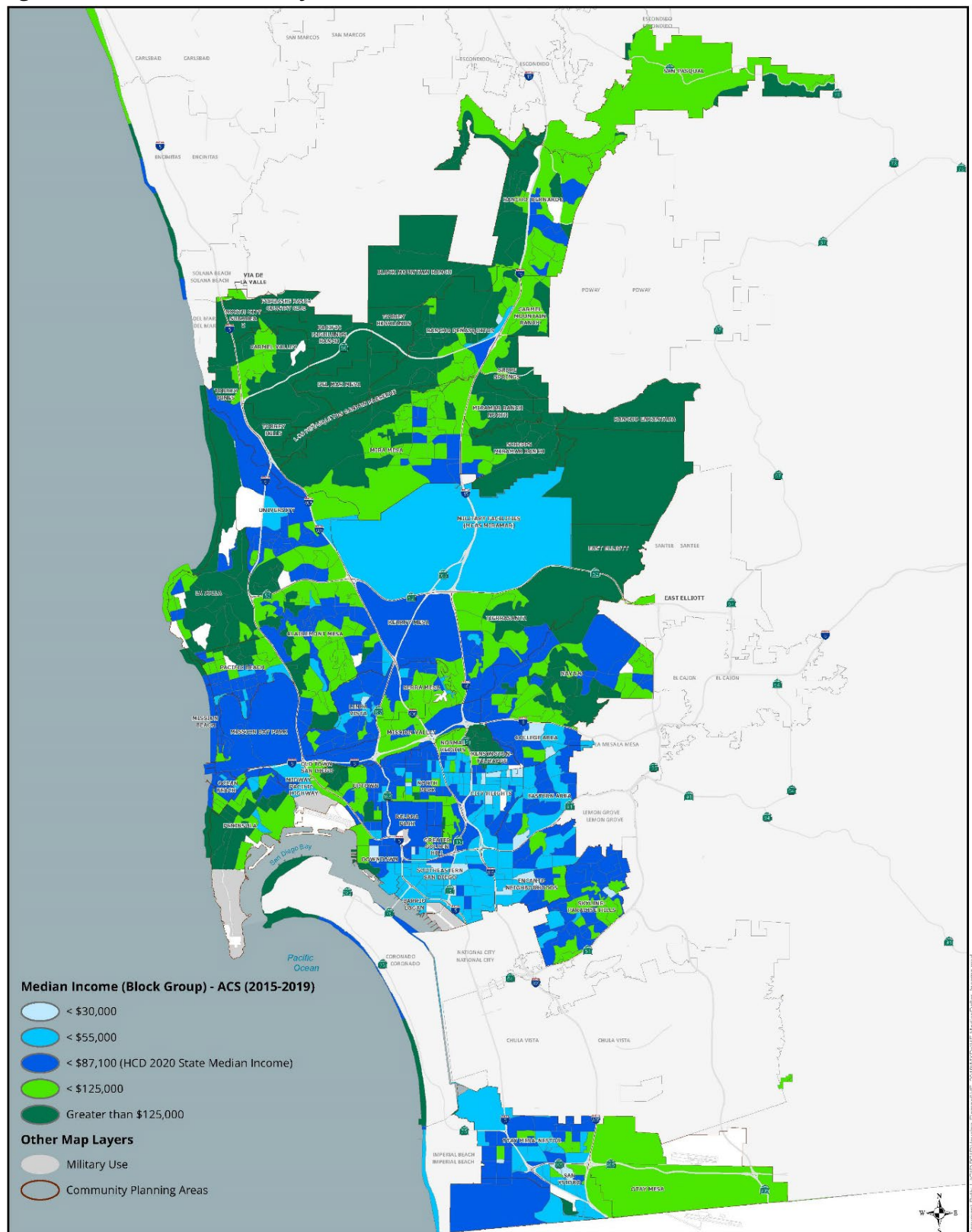


Figure A-45. Percentage of Persons with Disabilities who are Non-Elderly in the City of San Diego (ACS 2015-2019)



[illegible]

Figure A-47. Median Income by Census Tract (ACS 2015-2019)



Accessibility of Public Facilities and Services in the City of San Diego

ADA law requires that public entities with 50 or more employees complete a transition plan that identifies and schedules modifications needed to achieve accessibility in its facilities and public rights-of-way. The City's original Transition Plan, adopted in 1996, identified 212 high-use City-owned facilities needing architectural barrier removal to achieve accessibility; all original Transition Plan projects are complete. In 2009 the City updated its Transition Plan and identified 182 additional high use public facilities requiring architectural barrier removal. Since the 2009 update the City has completed 36 of these facilities; an additional 42 facilities are funded and 104 remain unfunded at a projected cost of approximately \$30 million. Transition Plans are working documents; the City continues to evaluate its public facilities for compliance with current accessibility regulations and update its list of projects needing barrier removal. In addition to Transition Plan-specific and complaint-related projects, all City capital projects incorporate ADA components as required by federal, state, and local laws, building codes, and regulations.

The 1990 and 2010 federal ADA civil rights laws also mandate that local governments maintain a complaint process for persons with a disability who have a grievance against the municipality. The City's formal ADA complaint process is through its Office of ADA Compliance and Accessibility. Most ADA complaints involve public rights-of-way, such as missing or inadequate curb ramps, missing sidewalks, and requests for accessible pedestrian signals at signalized roadway intersections. The City has approximately 270 open and unfunded complaints with a projected remediation cost of approximately \$26 million. The City resolves complaints feasibly and expeditiously, though many public rights-of-way complaints include complex design elements that delay resolution.

Services by the City that relate to opportunity include recreation and library services. The City facilitates access to recreation and libraries through the following programs:

- [Therapeutic Recreation Services](#) (TRS) program provides extensive programming for children and adults with any type of disability. Programs include adaptive sports, kids' adventure camps, family camping trips, talents shows, and other activities.
- The [City's Accessible Beach Programs](#) include access mats that allow wheelchairs to access the beaches and bays and free rental of beach/sand wheelchairs.
- Inclusion Aides: Inclusion aides facilitate the inclusion of individuals with disabilities into programs at recreation centers to ensure that Park & Recreation programs are accessible and usable by all citizens. Inclusion aides conduct assessments, develop goals for participation and provide necessary support. These include increased supervision levels, adapting games/activities and training of recreation center staff to ensure that the needs of persons with disabilities are being met.
- I CAN! and I CAN, Too! Centers: Library services for persons with disabilities are provided by the [I CAN! Center](#), located at the Central Library. Services include: Print/Tape Media services, TTY/TDD reference service, and Assistive Technology. The [I CAN, Too! Center](#) is designed for children with accessibility needs and their caregivers.

- Homebound Services Program: Library materials are delivered and retrieved directly at participating residents' door by library staff. Customers who are unable to physically get to the library are eligible for homebound services.
- The City also supports the use of service animals, as defined by the federal Americans with Disabilities Act (ADA), to accompany people with disabilities in all areas where members of the public are allowed to go.

Regional Patterns and Trends

According to 2013-2017 ACS data, 312,565 persons living in San Diego County had a range of disabilities, comprising 9.8 percent of the population. The largest age group of persons with disabilities were seniors, comprising 45.9 percent of the population with disabilities, followed by adults (ages 18 to 64) which comprised 47.1 percent of the population with disabilities. Children under the age of 18 made up about seven percent of the population with disabilities. (Table A-15). As shown in Table A-16, cognitive, ambulatory, and independent living disabilities were the most prevalent. San Diego County's senior population will grow substantially in the next 20 years. Since seniors have a much higher probability of having a disability, the housing and service needs for persons with disabilities are anticipated to grow proportionately with population.

People with developmental disabilities comprise approximately 1.5 percent of the total population. The Census does not specifically assess developmental disabilities. Using the percentage of persons with developmental disabilities and 2019 Department of Finance population estimates results in an estimate of just over 50,000 persons in the County of San Diego. The San Diego Regional Center provides a range of lifelong services and support to persons with or affected by developmental disabilities through four offices in the county. Services include diagnostic and eligibility assessments, program planning, case management, and other services and supports. As of June 2018, the Regional Center had just over 27,000 clients living in San Diego County, sixty-eight percent of whom were between six and 51 years of age. In addition to the services provided directly by the Regional Center, non-profit organizations including the ARC of San Diego, Community Catalysts California, and Community Interface Services offer comprehensive services for persons or individuals with developmental disabilities and their families, including diagnosis, counseling, coordination of services, advocacy and community education/training.

Table A-15, Disability Characteristics, ACS (Table Captured from SDAI)

Disability by Age and Type	Under	18 to 64 Years	65 Years and Over	% of Population with Disability ²
Hearing Difficulty	0.5%	1.3%	14.8%	27.9%
Vision Difficulty	0.6%	1.2%	6.7%	17.5%
Cognitive Difficulty	2.5%	3.1%	10.7%	39.6%
Ambulatory Difficulty	0.5%	3.2%	22.8%	51.1%
Self-Care Difficulty	0.9%	1.2%	9.4%	21.8%
Independent Living Difficulty ¹	--	2.6%	18.1%	39.9%
Total County	3.5%	7.0%	35.9%	--

Notes:

1: Tallied only for persons 18 years and over

2. Totals add up to more than 100 percent because person may have more than one type of disability.

Table A-16, Disability by Age (Table Captured from SDAI)

Jurisdiction	0-5 Years		5-17 Years		18-64 Years		65+ Years		Total		
	#	%	#	%	#	%	#	%	#	% of Disabled Population	% of Total Population
Urban County											
Coronado	-	0.0%	133	0.0%	527	0.2%	1,075	0.3%	1,735	0.6%	9.1%
Del Mar	-	0.0%	33	0.0%	137	0.0%	175	0.1%	345	0.1%	8.0%
Imperial Beach	28	0.0%	128	0.0%	1,635	0.5%	1,162	0.4%	2,953	0.9%	11.2%
Lemon Grove	11	0.0%	245	0.1%	1,524	0.5%	1,540	0.5%	3,320	1.1%	12.6%
Poway	43	0.0%	403	0.1%	1,989	0.6%	2,488	0.8%	4,923	1.6%	10.0%
Solana Beach	-	0.0%	51	0.0%	233	0.1%	577	0.2%	861	0.3%	6.5%
Unincorporated	136	0.0%	3,618	1.2%	25,375	8.1%	24,934	8.0%	54,063	17.3%	11.4%
Total Urban County	218	0.1%	4,611	1.5%	31,420	10.1%	31,951	10.2%	68,200	21.8%	11.1%
Entitlement Cities											
Carlsbad	44	0.0%	493	0.2%	3,528	1.1%	4,998	1.6%	9,063	2.9%	8.1%
Chula Vista	40	0.0%	1,706	0.5%	10,733	3.4%	11,958	3.8%	24,437	7.8%	9.4%
El Cajon	25	0.0%	1,009	0.3%	7,341	2.3%	5,076	1.6%	13,451	4.3%	13.3%
Encinitas	-	0.0%	390	0.1%	1,648	0.5%	3,324	1.1%	5,362	1.7%	8.6%
Escondido	23	0.0%	1,206	0.4%	8,508	2.7%	6,031	1.9%	15,768	5.0%	10.5%
La Mesa	-	0.0%	541	0.2%	3,192	1.0%	3,171	1.0%	6,904	2.2%	11.9%
National City	11	0.0%	339	0.1%	2,793	0.9%	3,178	1.0%	6,321	2.0%	11.3%
Oceanside	72	0.0%	1,007	0.3%	9,212	2.9%	9,146	2.9%	19,437	6.2%	11.3%
San Diego	586	0.2%	8,186	2.6%	58,738	18.8%	55,120	17.6%	122,630	39.2%	9.0%
San Marcos	-	0.0%	668	0.2%	3,039	1.0%	3,689	1.2%	7,396	2.4%	8.0%
Santee	10	0.0%	321	0.1%	3,198	1.0%	2,676	0.9%	6,205	2.0%	11.2%
Vista	9	0.0%	435	0.1%	3,819	1.2%	3,128	1.0%	7,391	2.4%	7.6%
Total County	1,038	0.3%	20,912	6.7%	147,169	47.1%	143,446	45.9%	312,565	100.0%	9.8%

Source: American Community Survey, 2013-2017.

Figures A-48 and A-49 show that although disabled persons are geographically dispersed throughout the more urbanized areas of the county, there are significant areas with a high density of disabled residents that coincide with minority concentration areas and RECAPs (Racially and Ethnically Concentrated Areas of Poverty). Specifically, concentrations of disabled residents can be seen in the North County cities of Oceanside, Vista, San Marcos, and Escondido, as well as the southern areas of the City of San Diego and southern cities. Due to the presence of residential care facilities, the City of San Diego and the cities of El Cajon, La Mesa, and Lemon Grove also have concentrations of residents with disabilities. The coastal and inland areas show less dense concentrations of residents with disabilities, which could be due to the high price of housing (in the coastal areas) or the scarcity of facilities and services for persons with disabilities (inland areas).

Figure A-48. Distribution of Persons with Disabilities in San Diego County (AFFH Data Viewer)

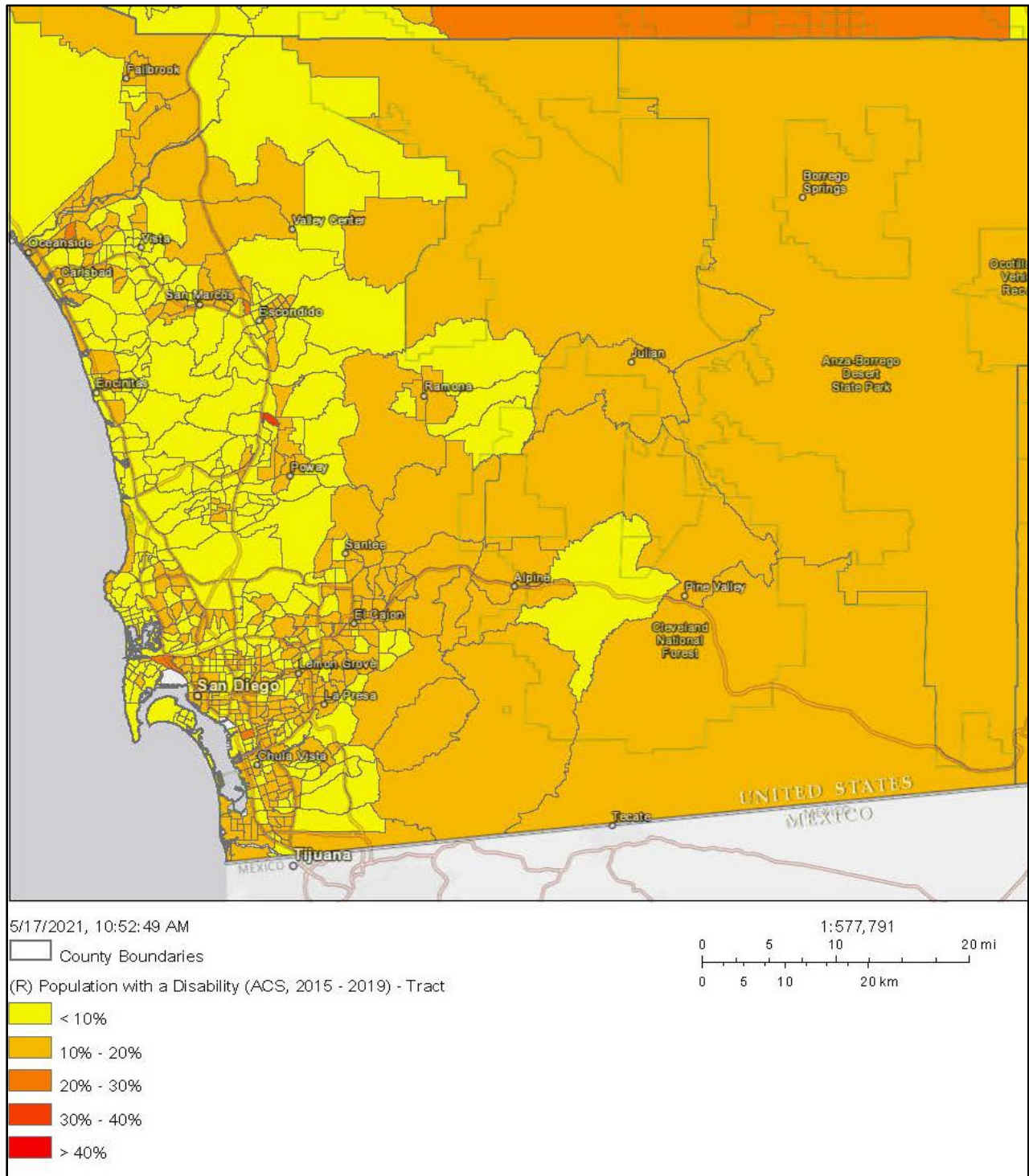
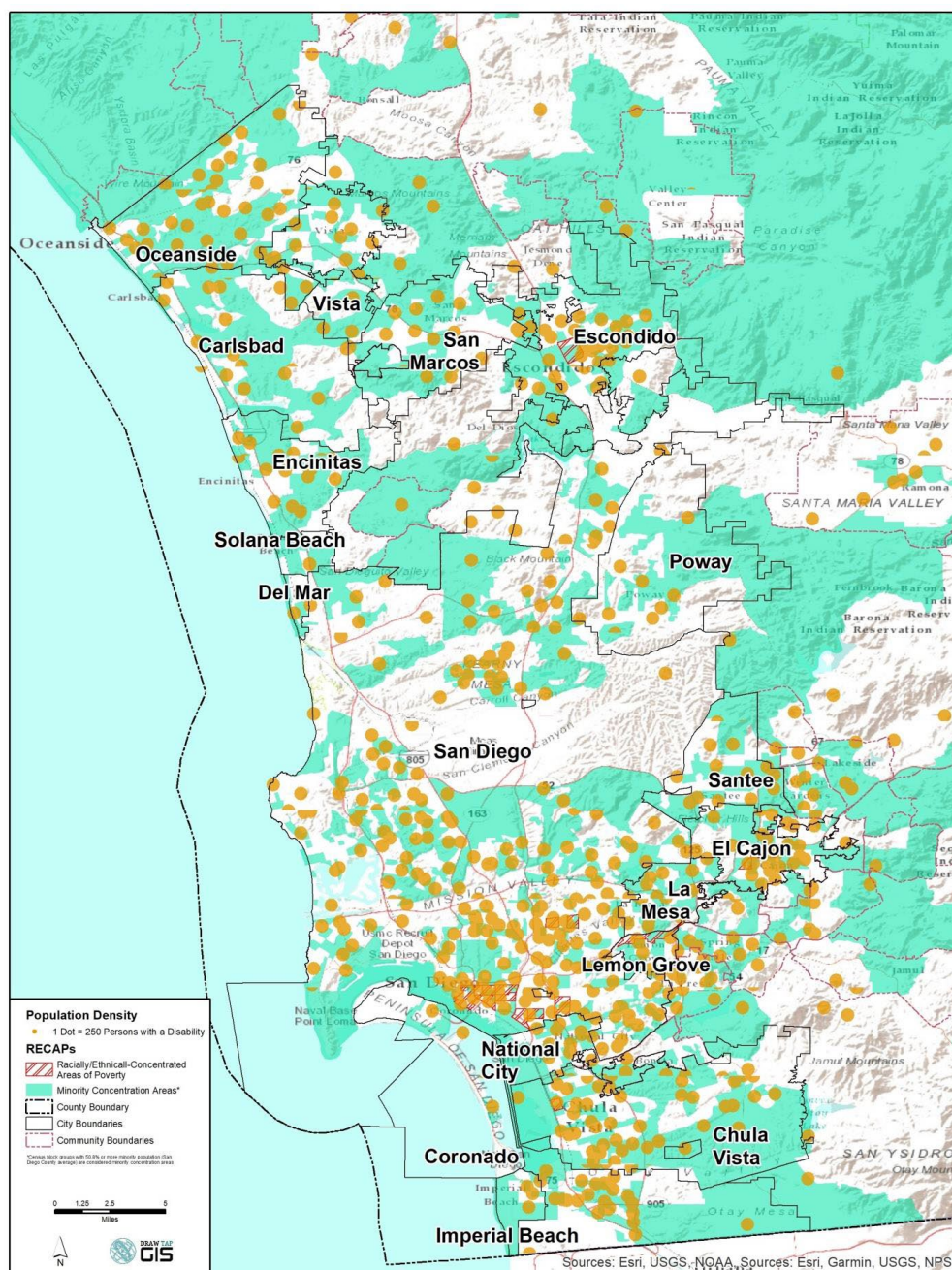


Figure A-49: Persons with Disabilities County-Wide (Figure Captured from SDAI)



In addition to market rate and affordable housing, licensed care facilities are among the housing options for people with disabilities and seniors. Approximately 593 State-licensed residential care facilities for the elderly, 401 adult residential facilities (for individuals ages 18 through 59) and 60 adult day care facilities (for individuals 18 and over) serve San Diego County residents. These licensed care facilities have a combined capacity of 28,131 beds. These numbers show a decrease from the number of licensed care facilities and bed capacity between 2014 and 2019. Between 2014 and 2015, the total bed capacity of licensed care facilities decreased by 3,716 from 31,847 to 28,131. The total number of facilities also dropped 700 from 1,855 to 1,155. Figure A-50 shows the location of the various licensed care facilities in San Diego County as of 2019. Most of the community care

facilities within the county are located within the larger incorporated cities. There is a noticeable presence of facilities in the unincorporated areas, specifically those surrounding the incorporated cities. As with the City of San Diego, since many Adult Residential Facilities provide housing for 4 to 6 individuals, the rental and ownership cost of housing and availability of 3+ bedroom rental and ownership homes (Figures A-51 and A-52) may influence the distribution of these facilities. However, since most of the county's population is located within the incorporated cities, residents living in these areas may have to travel a greater distance to access the region's inventory of care facilities. Concentrations of care facilities can be seen in the North County areas in and around the cities of Vista and Escondido and in the South County in and around the cities of Chula Vista and El Cajon.

Figure A-50: Licensed Care Facilities (Figure Captured from SDAI)

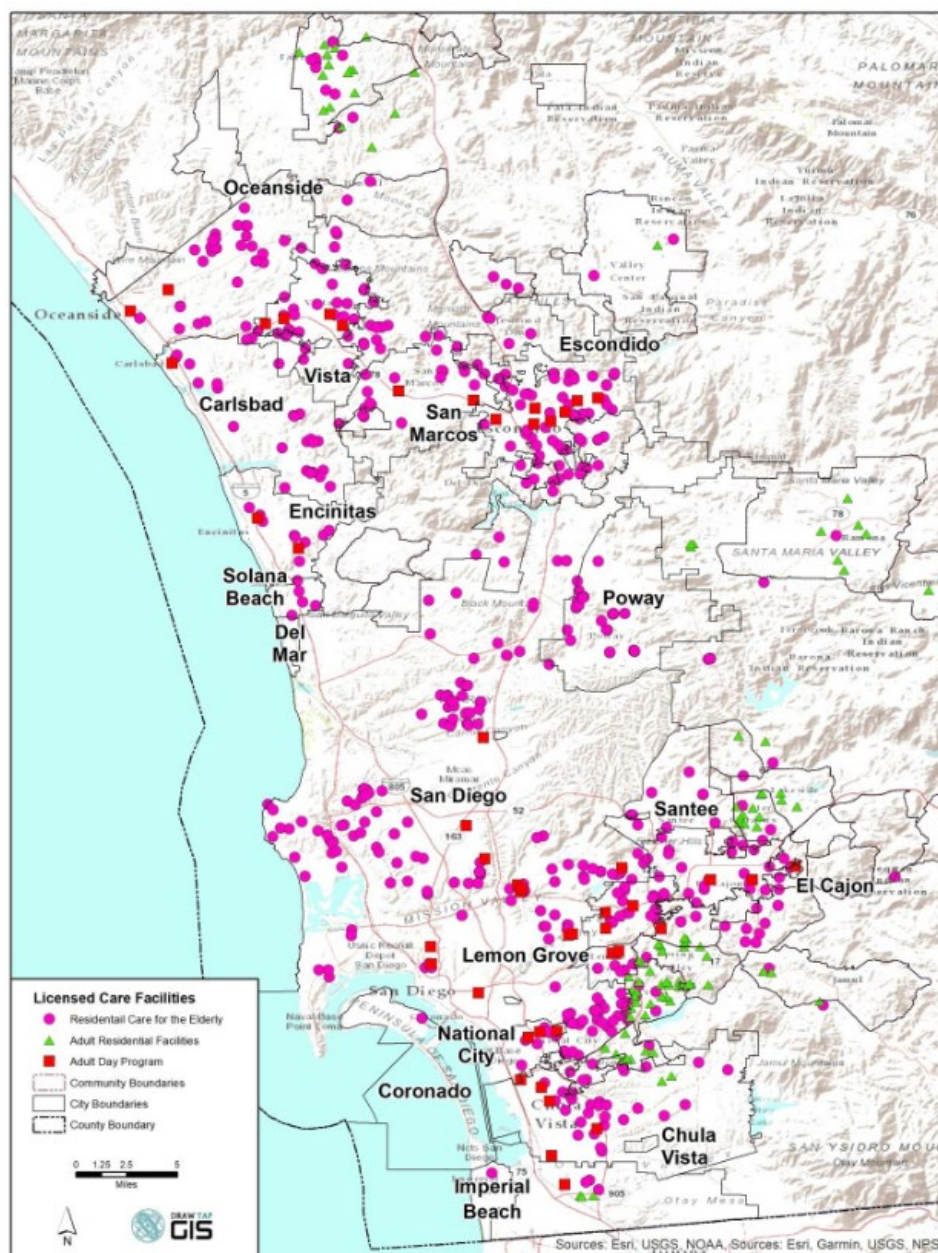


Figure A-51: Percent Renter Units with 3 or More Bedrooms (HUD CPD Maps)

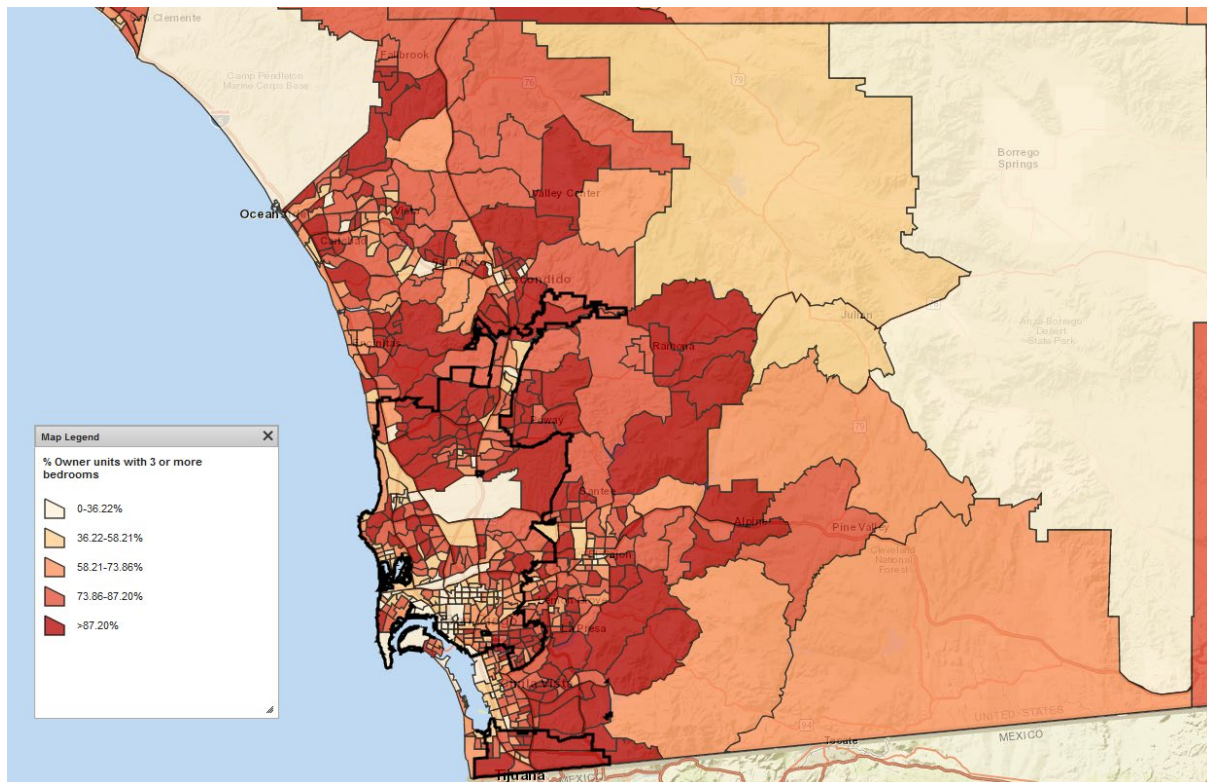
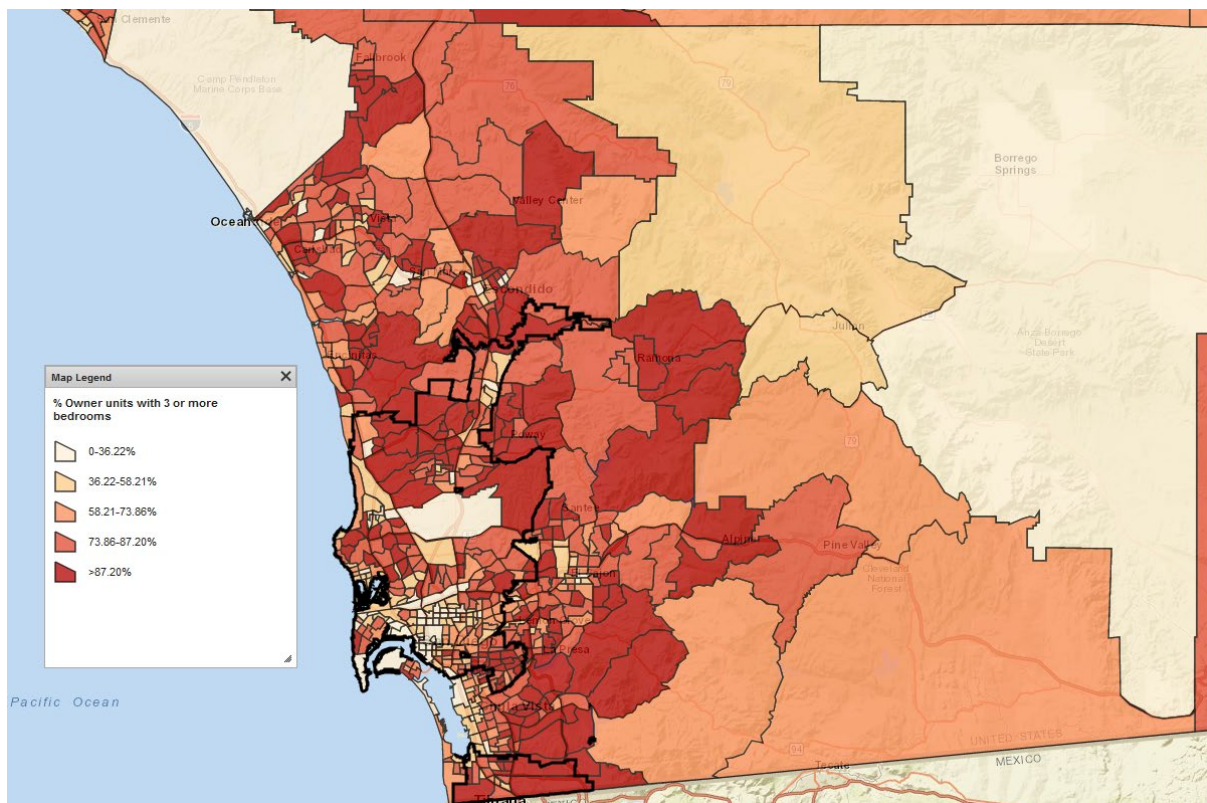


Figure A-52: Percent Owner Units with 3 or More Bedrooms (HUD CPD Maps)



LOCAL DATA AND KNOWLEDGE

Substantial evidence from multiple local sources testifies to significant, ongoing discrimination against persons with disabilities and households including persons with disabilities.

- A Housing Discrimination Survey was conducted as part of the outreach for the preparation of the 2020-2025 San Diego Regional Analysis of Impediments. Of a total of 1,132 persons who responded to the survey, 305 persons answered “Yes” to whether they have personally experienced discrimination in housing. Of the 305 people who felt they were discriminated against, 54 indicated that disability was the basis of the alleged discrimination.
- In random, paired fair housing rental tests conducted by Legal Aid Society of San Diego (LASSD) conducted for the City of San Diego between fiscal year (FY) 2016 and FY 2020, eighteen tests, or 34 percent, resulted in disparate treatment. In the tests where disparate treatment was shown, 12 related to reasonable accommodations.
- In 2019, LASSD conducted testing based on disability protection. During the test for disability protection, testers asked for a reasonable accommodation to the housing provider’s pet policy and requested an emotional support animal. In the results for these two fair housing tests, 15 percent of the test resulted in a finding of differential treatment meaning the housing provider denied the tester the reasonable accommodation request for their emotional support animal.
- LASSD year-end reports include summaries of the basis for complaints filed and of emerging trends in housing discrimination. For FYs 2018-2020, these reports show a continuing trend that persons with disabilities face discriminatory conduct by housing providers that equate to a violation of their housing civil rights. These summaries include the following key points:
 - The percentages of complaints involving housing discrimination against persons involving disabilities were 34% in FY 2018, 43% in FY 2019, and 66% in FY 2020.
 - Discrimination against persons with disabilities increased concerning discrimination involving assistive animals.
 - Reasonable accommodations of a closer parking spot due to a disability were a continuing issue.
 - Often, housing providers would deny the reasonable accommodation and not allow the assistive animal, or place unlawful verification information such as certified letters or notarized letters from veterinarians.

The Aging and Independence (AIS) Services Division of the County of San Diego’s Health and Human Services Agency provides services to older adults, people with disabilities and their family members. AIS provides a wide range of services, including information and access, advocacy, coordination, assessment, and authorization of direct services. Direct services are provided through contracts with vendors and agencies, and include in-home support, respite care, meals (senior dining centers and

home-delivered), health promotions, legal assistance, adult day care, transportation, educational opportunities, employment, money management, and counseling programs. The In-Home Supportive Services program can provide homemaker and personal care assistance to eligible individuals who are receiving Supplemental Security Income or who have a low income and need help in the home to remain independent. The approved AIS Area Plan for 2020-2024 identifies the following housing goals and needs assessment results:

- Housing goals:
 - Implement zoning ordinances and design requirements that create accessible, mixed-use villages with a variety of housing types and services.
 - Implement policies and programs to prevent and overcome homelessness.
 - Institutionalize a coordinated approach to creating and financing affordable housing stock.
 - Develop comprehensive supports associated with housing for successfully aging in community
- Needs Assessment Results Summary:
 - Affordable housing and assistance with system navigation
 - Transportation options (reliable and accessible)
 - Services to address social isolation/loneliness
 - Affordable healthcare and assistance with healthcare system navigation
 - Services for seniors experiencing homelessness
 - Caregiver support/training
 - Access to resources, including information about available services
 - Financial assistance and financial wellness education
 - Senior employment opportunities
 - Concerns about home maintenance and intermediate home repair

The San Diego Regional Center's 2020 Performance Contract Plan includes the following desired outcomes and planned activities related to housing, opportunity, and equity

- Outcome 2: Increase percentage of minors residing with families
 - Activity A: Maximize the use of community resources that provide supports to families to assist them in maintaining their children at home
 - Activity B: Provide information and training to community service providers on the special needs of families with children with developmental disabilities.

- Activity D: Develop new crisis intervention services and Enhanced Behavioral Support Homes for children and continue usage of existing crisis intervention and wrap-around services
- Outcome 3: Increase number and percentage of adults residing in independent living
 - Activity A: Contract with a nonprofit organization to develop and help people access safe and affordable housing.
 - Activity B: Review living options, including related supports, with clients at the time of the annual review.
 - Activity C: Assist clients and families to access the assistive technology necessary to live independently.
- Outcome 4: Increase number and percentage of adults residing in supported living
 - Activity A: Contract with a nonprofit organization to develop and help people access safe and affordable housing.
 - Activity B: Review living options, including related supports, with clients at the time of the annual review.
 - Activity C: Assist clients and families to access the assistive technology necessary to live independently.
- Outcome 5: Increase number and percentage of adults residing in Adult Family Home Agency homes
 - Activity A: Review living options, including Adult Family Homes with clients at the time of the annual review.
- Outcome 6: Increase the number of adults residing in family homes (home of parent or guardian)
 - Activity B: Provide services and supports to clients and families to live in the family home.
- Outcome 7: Increase number and percentage of adults residing in home settings
 - Activity A: Contract with a nonprofit organization to develop and help people access safe and affordable housing.
 - Activity B: Review living options, including related supports, with clients at the time of the annual review.
 - Activity C: Assist clients and families to access the assistive technology necessary to live in a home setting.
 - Activity D: Provide services and supports to families of clients who are elderly and live with their family

- Outcome 8: Increase the percentage of adults living in housing facilities for less than 6 people
 - Activity A: Increase individual bedrooms for clients in residential facilities
 - Activity B: Advocate for adequate reimbursement rates for services provided to clients
 - Activity C: Encourage the development of 4 versus 6 bed homes
- Outcome 9: Increase the percentage of children living in housing facilities for less than 6 people
 - Activity A: Increase individual bedrooms for clients in residential facilities
 - Activity B: Advocate for adequate reimbursement rates for services provided to clients
 - Activity C: Encourage the development of 4 versus 6 bed homes
- Outcome 10: Measure the number and percent of individuals receiving only case management services by age and ethnicity.
 - Activity A: San Diego Regional Center will generate data to monitor expenditures among clientele.
- Outcome 11: Measure the percent of total annual purchase of service expenditures by individual's ethnicity and age.
 - Activity A: San Diego Regional Center will generate data to monitor expenditures among clientele.
- Outcome 12: Measure the number and percentage of clients ages 16-64 with earned income
 - Activity A: San Diego Regional Center will collect data generated by Employment Development Department (EDD) to measure the number and percentage of clients ages 16-64 with earned income.
- Outcome 13: Measure the average annual wages for clients ages 16-64.
 - Activity A: San Diego Regional Center will collect data generated by Employment Development Department (EDD) to measure the average annual wages for clients ages 16-64.
- Outcome 14: Measure the annual earnings of clients ages 16-64 compared to all people with disabilities in California
 - Activity A: San Diego Regional Center will collect data from service providers to measure the annual earnings of clients ages 16-64 compared to people with all disabilities in California.
- Outcome 15: Measure the number of adults who were placed in competitive, integrated employment following participation in a Paid Internship Program

- Activity A: San Diego Regional Center will collect data from service providers to measure the number of adults who were placed in competitive, integrated employment following participation in a Paid Internship Program.
- Outcome 16: Measure the number of adults who were placed in competitive, integrated employment following participation in a Paid Internship Program
 - Activity A: San Diego Regional Center will collect data from service providers to measure the percentage of adults who were placed in competitive, integrated employment following participation in a Paid Internship Program.
- Outcome 17: Measure the average hourly or salaried wages and hours worked per week for adults who participated in a Paid Internship Program during the prior fiscal year.
 - Activity A: San Diego Regional Center will generate data
- Outcome 18: Measure the average wages and hours worked for adults engaged in competitive, integrated employment, on behalf of whom incentive payments have been made
 - Activity A: San Diego Regional Center will collect data from service providers to measure the average wages and hours worked for adults engaged in competitive, integrated employment, on behalf of whom incentive payments have been made.
- Outcome 19: Measure the total of \$1,000, \$1,250 and \$1,500 incentive payments made for the fiscal year.
 - Activity A: San Diego Regional Center will generate data to measure the total of \$1,000, \$1,250 and \$1,500 incentive payments made for the fiscal year.
- Outcome 20: Measure the percentage of adults who reported having integrated employment as a goal in their Individual Program Plan (IPP).
 - Activity A: San Diego Regional Center will generate data to measure the percentage of adults who reported having integrated employment as a goal in their IPP.

Other local organizations assist in connecting and supporting persons with disabilities to find suitable and accessible housing in community settings and suitable employment. Organizations like Access 2 Independence, San Diego County's designated Independent Living Agency; The ARC of San Diego; Community Interface Services; and Community Catalysts California also support community living in Independent Living and Supported Living programs and facilitate Supported Employment and community integration programs. San Diego Workforce Partnership also provides employment connection and support programs for persons with disabilities, including a new Breaking Barriers San Diego program funded by the Department of Labor (<https://workforce.org/news/new-dol-funded-program-helps-adults-disabilities-find-employment/>).

The Independent Living Association (ILA), administered by Community Health Improvement Partners with funding from the Mental Health Services Act via San Diego County Department of Health and Human Services (HHSA), is a collaborative community-wide effort focused on supporting independent living operators, tenants and the community by promoting high quality independent livings. The ILA is a resource to turn to for objective, unbiased information about independent livings in San Diego

County. It provides an ILA directory, provides each member of the ILA with annual home visits to support them in their pursuit of providing quality housing, provides a complaint process to ensure fair and prompt review of complaints concerning any ILA member violating ILA Membership Requirements or Quality Standards; and provides education and training for independent living operators, tenants, and community members.

Affordable housing developers and other organizations are working to increase the supply of affordable housing that is available to persons with disabilities. For instance, Southern California Housing Collaborative, headquartered in San Diego, is working to enhance, preserve, develop and administer decent housing that is affordable to low and very low income individuals with Developmental Disabilities and their families.

The City of San Diego has an Accessibility Advisory Board (AAB), which has undertaken work to address accessible housing needs through Increasing Accessible Housing and Universal Design Ad Hoc Committees. The City's Planning Department is working with the AAB's Increasing Accessible Housing Ad Hoc Committee on a Draft Accessible Housing Code Update. The City's Development Services Department in 2020 began a new, free "Ask a Certified Access Specialist" online service to assist members of the construction industry and homeowners to understand ADA construction requirements to improve accessibility for properties and construction projects. Upon request, a Certified Access Specialist will review building and site plans for compliance with all applicable construction-related accessibility standards that ensure housing and public facilities are accessible to individuals with disabilities. Program webpage: <https://www.sandiego.gov/development-services/ask-a-casp>

SANDAG, the Regional Planning agency for San Diego County, works with partner organizations, public transportation agencies, and other transportation providers to plan for, fund, and operate transportation services for seniors and persons with disabilities. SANDAG administers a Social Services Transportation Advisory Council and a Specialized Transportation Grant Program that is funded by Federal Transit Administration Section 5310 and local TransNet sales tax revenues. SANDAG has designated the non-profit organization Full Access and Coordinated Transportation (FACT) to coordinate public, nonprofit, private and other transportation services in San Diego County. FACT seeks to improve access to transportation for seniors, persons with disabilities, veterans, and the income disadvantaged and fill gaps in existing services. FACT's Council on Access and Mobility is comprised of approximately 31 providers and transportation interest groups who advise the FACT Board of Directors.

SANDAG has recently released the Draft 2021 Regional Plan for San Diego County. As part of the preparation of the Draft Regional Plan, a Social Equity Analysis was conducted that includes analysis of impacts of draft plan for people of color (POC) vs. non-POC county residents, low income vs. non-low income residents, and senior vs. non-senior residents.

OTHER RELEVANT FACTORS

For the preparation of the State Council on Developmental Disabilities' Statewide Strategic Framework for Expanding Housing Opportunities for People with Intellectual and Developmental Disabilities, a community survey was conducted to gather the expressed desires, attitudes, and

experiences of consumers, family members, service providers, regional centers, property managers, and housing developers. Its primary finding was that the largest housing barriers facing people with I/DD and their families were the lack of affordable housing, insufficient income, long waiting lists for housing vouchers, or landlords who won't accept vouchers. It was also clear that this population desires a "range of housing" options—including independent living, shared housing, licensed group homes, etc. Yet, according to the California Housing and Community Development Department, the state is creating 100,000 fewer units needed per year to meet the demand of its residents. This reality acutely affects people with I/DD who are living on fixed incomes or minimum wage salaries. The Strategic Framework makes recommendations in the following areas for improving the state's overall response to the housing crisis for people with intellectual and developmental disabilities:

- Improve system wide data and planning
- Enhance statewide and local partnerships
- Expand current and create new funding to identify or create additional housing opportunities
- Ensure that mainstream systems increase their focus on the housing needs of people with I/DD

One of the key strategies for implementing the full range of recommendations included in the Strategic Framework is to mobilize a broader coalition that includes consumers, family members, service providers, housing sponsors, regional centers and DDS, in addition to the mainstream housing and community development system, to collaborate on systematically resolving this public challenge.

The California State Plan for Independent Living (SPIL) for FYs 2021-2023 is a three-year strategic plan that provides the framework for the delivery of Independent Living services in California. The mission of the CA Independent Living network and the SPIL is that the California State Independent Living program will partner with stakeholders to provide advocacy and services that create equity for individuals with disabilities. Access 2 Independence is the designated Center for Independent Living for San Diego County.

The State's Independent Living Services Program, funded through the Rehabilitation Act, state general funds, and Social Security Program Income (State General Fund/SSPI), makes funding available for providing, expanding, and improving the provision of independent living services. The program also provides for the collaboration among the Independent Living Services Program, the Centers for Independent Living, and other programs that address the needs of individuals with significant disabilities.

According to the FY2021-2023 SPIL, since the California State Independent Living Council's 1996 inception, tri-annual, state-level research on unmet independent living needs has emphasized the need for increased funding and expansion of the Independent Living Network. The SPIL further states that Californians with disabilities and their families benefit from a statewide perspective focused on

the interrelatedness of health care, social services, transportation, housing and employment initiatives; and that local communities' benefit when state efforts embrace rather than inhibit flexibility.

Under the SPIL, services to be provided to persons with disabilities that promote full access to community life including geographic scope, determination of eligibility and state-wideness include the following:

1. Core Independent Living Services, as follows:
 - Information and referral
 - Independent living skills training
 - Peer counseling
 - Individual and systems advocacy
 - Transition services including:
 - Transition from nursing homes & other institutions
 - Diversion from institutions
 - Transition of youth (who were eligible for an IEP) to post-secondary life
2. Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of the Rehabilitation Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with disabilities).
3. Mobility training
4. Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services
5. Personal assistance services, including attendant care and the training of personnel providing such services
6. Surveys, directories, and other activities to identify appropriate housing, recreation opportunities, and accessible transportation, and other support services
7. Consumer information programs on rehabilitation and Independent Living services available under the Rehabilitation Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under the Rehabilitation Act
8. Education and training necessary for living in the community and participating in community activities
9. Supported living
10. Transportation, including referral and assistance for such transportation

11. Community awareness programs to enhance the understanding and integration into society of individuals with disabilities

The FY2021-2023 SPIL identifies the following goals and objectives related to housing and access to opportunity:

- Goal 1: The Independent Living Network will work with community business partners to develop more connections to Independent Living services that will benefit employment, transportation, and housing for individuals with disabilities.
- Goal 2: The California Independent Living Network will enhance and expand existing transition services, including services for youth and diversion from living in institutional settings.
 - Objective: Independent Living Network members will increase access to more youth transition tools to respond to the needs and interests of people with disabilities ages 14 to 24.
 - Objective: Californians with disabilities move from more restricted settings into the community setting of their choice.
 - Objective: Californians with disabilities will achieve diversion assistance from their local Center for Independent Living. The number of persons benefitting from diversion grants [diversion from institutions]
 - Objective: Individuals who transition [for example, from an institutional facility such as a licensed skilled nursing facility, intermediate care facility for the developmentally disabled, Acute Care Hospital, etc. into a community setting of their choice] are assessed on their quality of life and ability to make informed choices.
- Goal 3: In addition to direct services, Californian's with disabilities will continue to benefit from systems change advocacy that results in systemic change that increases access to public and private resources that enhance independence.
- Goal 5: SILC will facilitate technical assistance, funding information, best practices information, data analysis and other planning assistance that supports Independent Living Center interest and leadership in statewide LTSS system changes across the State.

Finally, with regard to accessible housing and in the context of the information presented earlier in this section about the limited financial resources of many people with disabilities and households that include people with disabilities, it seems important to note that while the Fair Housing Act requires landlords to allow tenants with disabilities to make reasonable access-related modifications to their private living space, as well as to common use spaces, the access-related modifications must be made at the tenant's own expense.

CONCLUSIONS, SUMMARY OF ISSUES, AND CONTRIBUTING FACTORS

Conclusions and Summary of Issues

As of 2017, almost one in ten City residents had a disability, including almost one in three residents age 65 and older. Persons with disabilities living in the City of San Diego experience lower rates of workforce participation and higher rates of unemployment than people in the broader population and often rely on fixed income sources, affecting their financial resources available for living expenses. Employment discrimination and regulations regarding earned income and reductions in disability benefits also complicate the financial situation of many people who experience disabilities. Combined with high housing costs and low inventory, the compound challenges faced by disabled individuals can too often include homelessness.

While persons with disabilities are living in a fairly dispersed pattern throughout the City, non-elderly persons with disabilities are more likely to be living in inland areas and areas that coincide with RECAPs, low and moderate income areas, and displacement risk areas while elderly persons with disabilities are more likely to be living in coastal areas with high median incomes.

The current inventory of accessible housing units within the City is unknown, and likely to be insufficient to meet the needs of persons with disabilities given that the majority of the City's housing stock was built prior to the 1990 passage of the Americans with Disabilities Act. Existing supportive housing facilities and independent living services serve substantial numbers of San Diegans with disabilities, but only a portion of the total number of local persons with disabilities. While there are some supportive housing facilities located in central San Diego, a larger proportion are located away from the central city and in unincorporated areas or cities just outside of the City of San Diego. This pattern perhaps results from the location of housing units with 3 or more bedrooms and/or rental or ownership housing cost patterns. City of San Diego zoning requirements which require separation between Residential Care Facilities, which include supportive housing facilities as well as drug and alcohol rehabilitation facilities, could be a barrier to the development of additional supportive housing facilities within the City.

Local and State operational and strategic plans for housing and independent living support services for persons with disabilities identify the following goals and needs:

- Implement zoning ordinances and design requirements that create accessible, mixed-use villages with a variety of housing types and services
- Implement policies and programs to prevent and overcome homelessness
- Institutionalize a coordinated approach to creating and financing affordable housing stock
- Develop comprehensive supports associated with housing for successfully aging in community
- Increase the number of children with disabilities able to live at home

- Increase the supply of and access to safe and affordable housing
- Increase services for finding and obtaining safe and affordable housing
- Increase the supply of supportive housing
 - Increase the number of Enhanced Behavioral Support Homes
 - Increase the number of Adult Family Homes
 - Increase the number of four-bed housing facilities for adults and children
- Increase the number of adults living in the home of a parent or guardian
- Increase the availability of Independent Living services for employment, transportation and housing
- Increase transition services and support for individuals leaving institutional settings for community living settings
- Increase diversion services and support for individuals faced with institutional living
- Increase access to assistive technology and living supports
- Home maintenance and intermediate home repair assistance
- Accessibility modifications financial assistance
- Services for seniors and disabled persons experiencing homelessness
- Reliable and accessible transportation options
- Services to address social isolation/loneliness
- Affordable healthcare and assistance with healthcare system navigation
- Caregiver support/training
- Access to resources, including information about available services
- Financial assistance and financial wellness education
- Paid employment opportunities and employment assistance
- Senior employment opportunities

Contributing Factors

The factors contributing to disparities in access to opportunities for persons with disabilities in the City of San Diego include:

- Access to publicly supported housing for persons with disabilities
- Access to affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes

- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Zoning regulations regarding Residential Care Facilities
- Housing discrimination against persons with disabilities

DISPROPORTIONATE HOUSING NEEDS INCLUDING DISPLACEMENT

DISPROPORTIONATE HOUSING NEEDS

Disproportionate Housing Needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, substandard housing conditions and homelessness. These categories of housing need can be further described as follows:

- Cost burden is the fraction of a household's total gross income spent on housing costs. There are two levels of cost burden: (1) "Cost Burden" refers to the number of households for which housing cost burden is greater than 30 percent of their income; and (2) "Severe Cost Burden" refers to the number of households paying 50 percent or more of their income for housing. This analysis must address the burdens on both owners and renters (tenure).
- Overcrowding: Households having more than 1.01 to 1.5 persons per room are considered over-crowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, or half-rooms. This analysis must address the overcrowding on both owners and renters
- Substandard Housing: As defined by the U.S. Census, there are two types of substandard housing problems: (1) Households without hot and cold piped water, a flush toilet and a bathtub or shower; and (2) Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator. Given the limits of this measure, the analysis must incorporate local data and knowledge, such as housing conditions surveys or code enforcement activities.
- Homelessness: Includes individuals or families who lack or are perceived to lack a fixed, regular, and adequate nighttime residence, or who have a primary nighttime residence in a shelter, on the street, in a vehicle, or in an enclosure or structure that is not authorized or fit for human habitation. People experiencing homelessness are vulnerable to violence and criminalization due to their unhoused status.

REGIONAL AND LOCAL PATTERNS AND TRENDS

Local Patterns and Trends

Various patterns and trends related to factors such as demographics are apparent at the local level and can inform disproportionate housing needs related to overcrowding, substandard housing or cost burden as well as displacement risk and lack of housing/homelessness.

Figure A-53 below (using data obtained from AFFH Data and Mapping Resources) depicts several housing constraints within the region with local municipal boundaries outlined. Within the City of San Diego, 20 to 40 percent of households experience these housing constraints. Note that this map has

limitations due to the city's large geographic size which encapsulates a broad range of housing characteristics. Also note, as a result of its large size, San Diego's distinct communities and neighborhoods are separately identified as planning areas by the General Plan.

Figure A-53: Percent of Households with any Overcrowding, Substandard Housing or Cost Burden (ACS, CHAS)

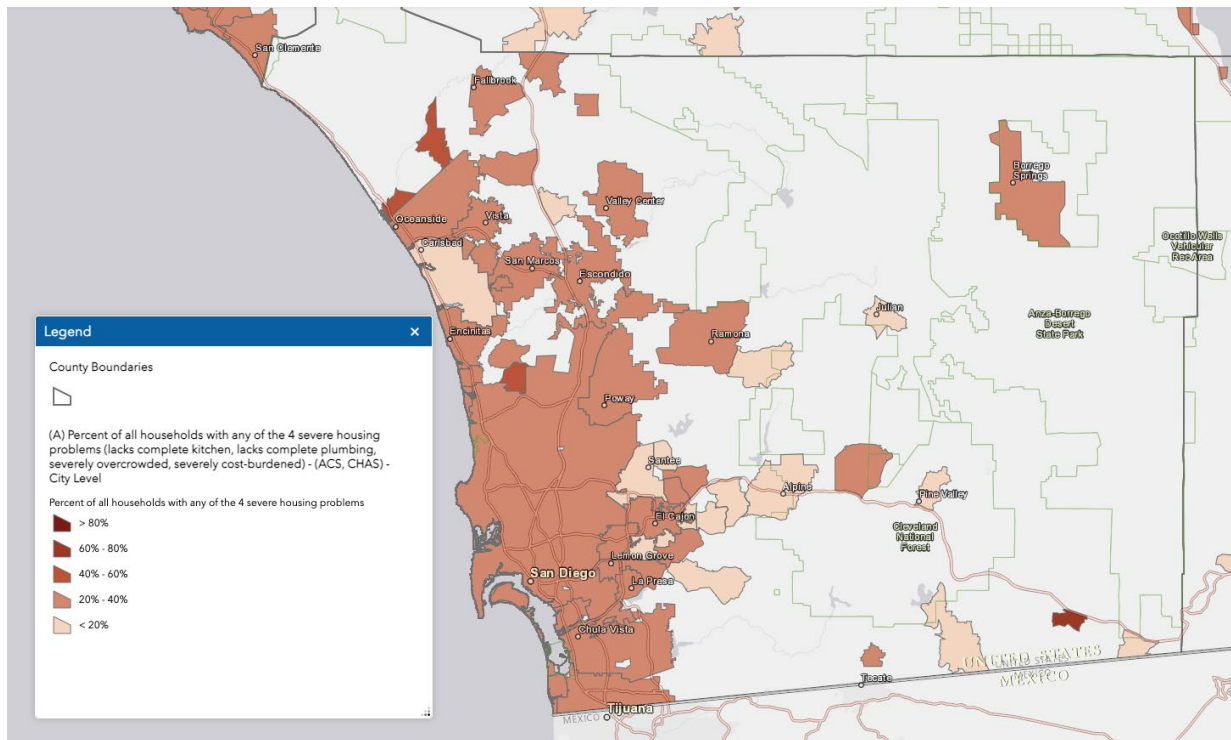


Table A-17 below shows that in 2019, the City was the eighth largest city in the nation and the second largest city in California by population. The San Diego Association of Governments (SANDAG) forecast that the City's population will increase by approximately 26 percent between 2012 and 2035 requiring significant housing investments.

Table A-17: San Diego Region and City of San Diego Population Forecast

Location	2012	2020	2035	2050	2012-2035 Change		2012-2050 Change	
City of San Diego	1,321,315	1,453,267	1,665,609	1,777,936	344,294	26%	456,621	34.6%
San Diego County	3,143,429	3,435,713	3,853,698	4,068,759	710,269	23%	925,330	29%
City as a Percentage of the County	43%	42.3%	43.2%	43.7%				

Source: SANDAG Series 13 Regional Growth Forecast

Employment has an important impact on housing needs and the demand for various types of housing. Table A-18 below shows that the City is projected to add 153,700 jobs between 2012 and 2035. These will include low- and high-skill jobs, so housing in the City will need to continue to accommodate a range of housing types at prices affordable to the range of household incomes.

Table A-18: SANDAG Regional Growth Forecast

Location	2012	2020	2035
City of San Diego	742,718	830,107	896,404
San Diego Region	1,346,969	1,520,180	1,665,994
Source: SANDAG Series 13 Regional Growth Forecast			

The cost structure of local housing and household living expenses weighs more heavily on lower income households. Lower income households therefore disproportionately experience the patterns of overcrowding, cost burden, substandard housing and homelessness. The city's income distribution is shown in the Table A-19 below. State law identifies five income categories in relation to AMI: Extremely Low-Income, Very Low-Income, Low-Income, Moderate-Income, and Above Moderate-Income. The half of San Diego's households within the low and low-moderate income range face various housing challenges. Of these, Extremely Low-Income households, defined as a household earning 30 percent or less of the median income, face the most significant housing constraints such as overcrowding and high housing cost burden, and they rely on numerous options for low-cost housing such as permanent supportive housing, transitional housing, and subsidized housing. The Housing Element estimates approximately 74,000 households are within the Extremely Low-Income category.

Table A-19: City of San Diego Income Distribution (2017)

Household Income	Income Distribution
Less than 25,000	15%
25,000 to 49,999	17%
50,000 to 74,999	17%
75,000 to 99,999	13%
100,000 to 149,999	17%
150,000 or more	21%
Median	\$76,662
Source: U.S. Census Bureau, American Community Survey 2017	

The area's median income is depicted by Figure A-53 below with the local municipal boundaries outlined. The City of San Diego's large geographic size and long development history have contributed to a dispersed range of household income groupings. Higher income populations tend to be located within coastal communities such as La Jolla and Peninsula (Point Loma) and the more recently developed "suburban" communities in the northern part of the City. These areas have less than twenty five percent of their populations comprised of low to moderate income households. The housing in these areas is also above standard. Lower income populations tend to be located in communities with an earlier development history and a higher percentage of non-white persons.

There are also lower income populations associated with housing in or around the region's military bases and colleges.

Figure A-53: Area Median Income (ACS 2015-2019)

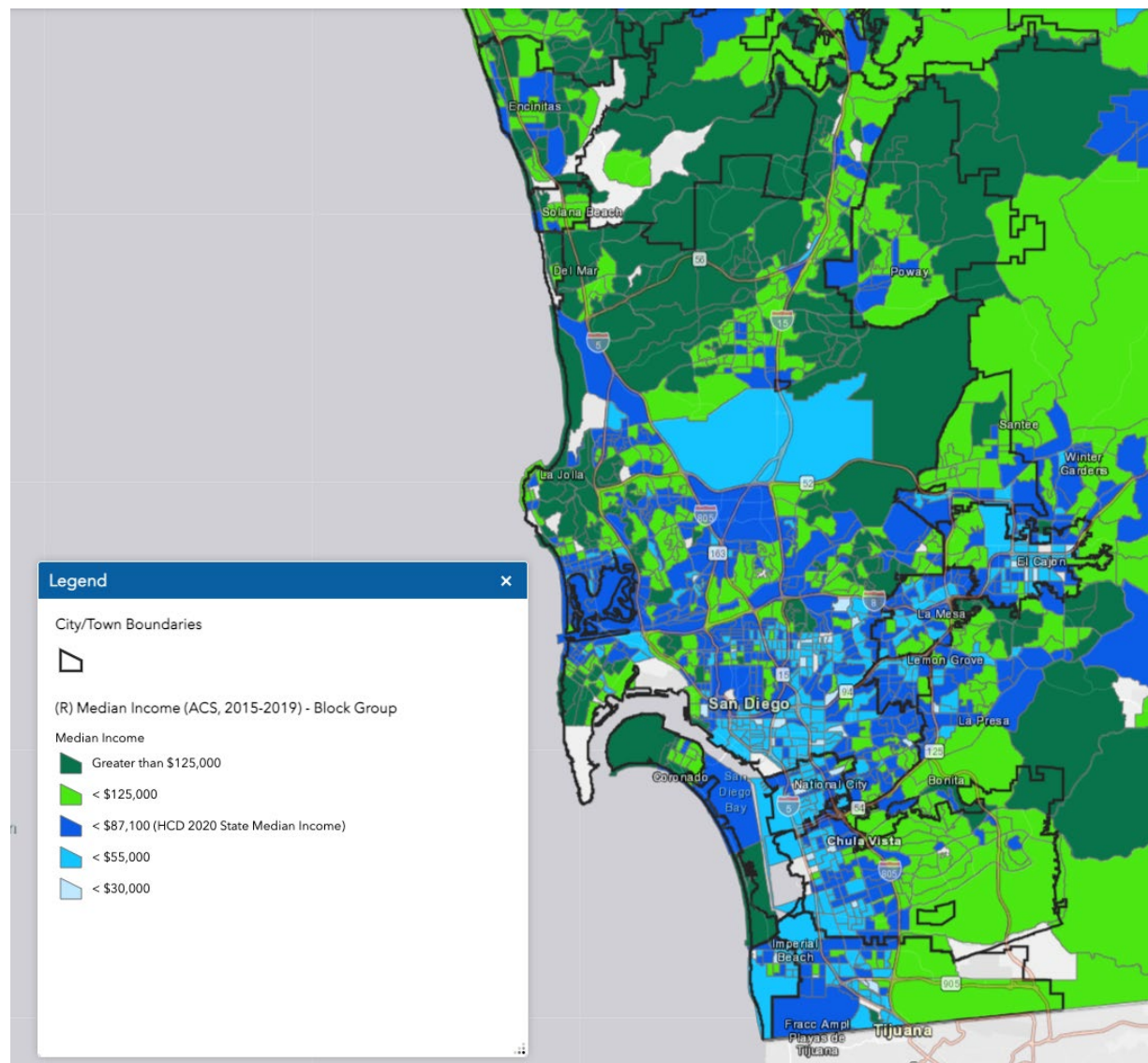


Figure A-54 below shows the percentage of low and moderate income households (those earning less than 80% of the median income) in each of the census tracts with municipal boundaries outlined. The highest percentage of low to moderate income households are located primarily within the Barrio Logan community near downtown, the City Heights community near the I-15 freeway and the Southeastern San Diego community south of the SR-94 freeway. Areas with 50 to 75 percent of their populations comprised of low to moderate income households are more widely dispersed and include areas within the coastal, central, eastern, and southern portions of the city. There are also clusters of low to moderate income households in or around military bases and colleges, and in the northern part of the city along the I-15 freeway corridor.

Figure A-54: Low to Moderate Income Population (HUD CPD Maps)

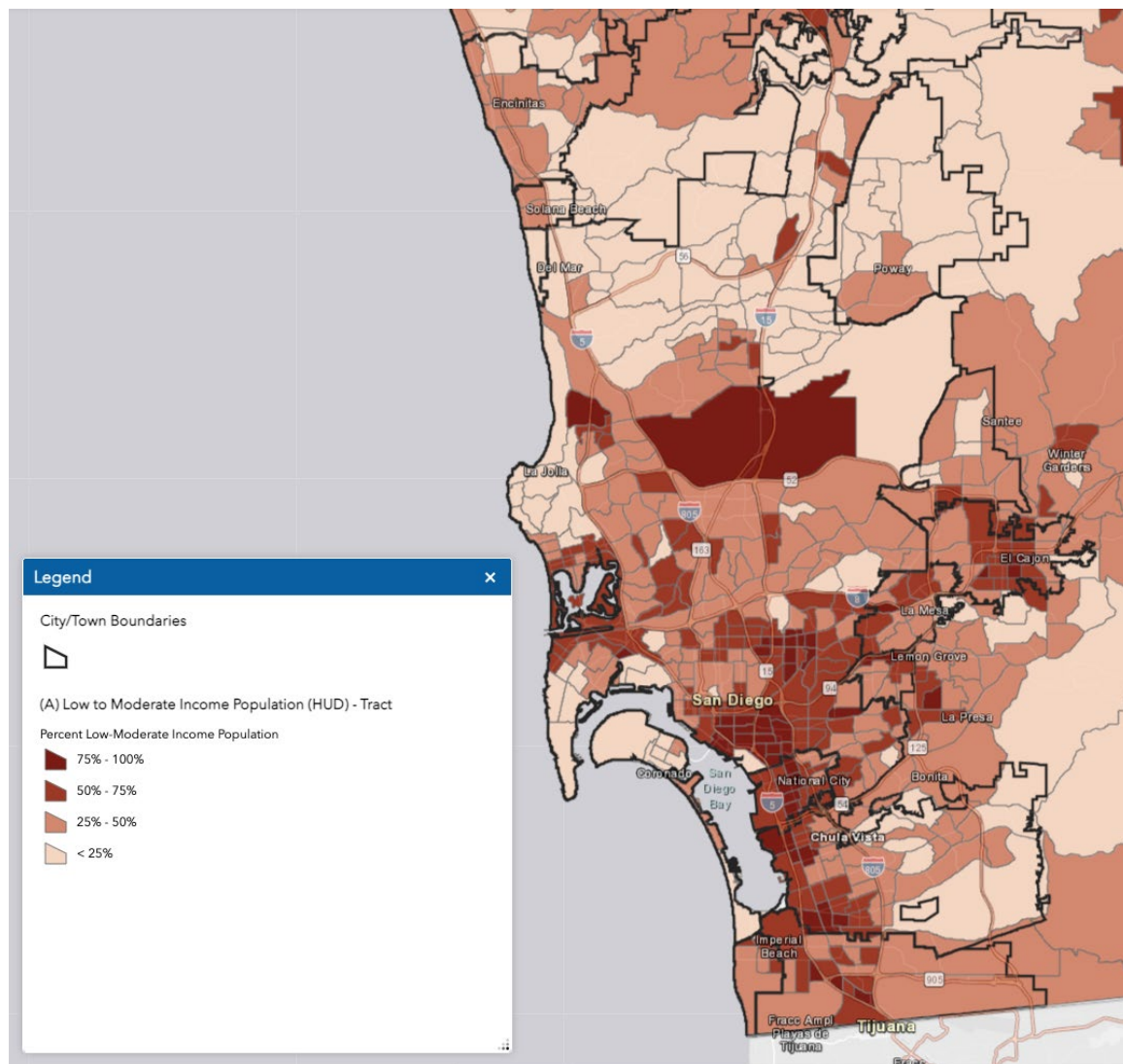


Table A-20 below shows current and forecasted population by race and ethnicity. San Diego has become an increasingly ethnically and racially diverse community. Most racial and ethnic groups are expected to grow, though white and black racial groups are expected to decline by 2035.

Table A-20: City of San Diego Population by Race and Ethnicity (2012-2035)

Race / Ethnicity	2012		2020		2035	
	Number	Percent	Number	Percent	Number	Percent
Hispanic	388,890	29%	464,700	32%	621,011	37%
Non-Hispanic	932,425	71%	988,567	68%	1,044,598	63%
White	585,515	44%	598,766	34%	565,943	34%
Black	77,722	6%	80,069	6%	76,627	5%

Source: SANDAG Series 13 Regional Growth Forecast

Figure A-55 below depicts the percent of total non-white population as well as racially or ethnically concentrated areas of poverty. The areas with a larger non-white population show a range of median income levels. Areas with a larger non-white population and a large percentage of low to moderate income households are located primarily within the Mid-City communities near the I-15 freeway and the communities south of the SR-94 freeway to the international border. Racially or ethnically concentrated areas of poverty (RE/CAP's) are located within this same area, including within portions of Downtown, and portions of the communities of Barrio Logan, Southeastern San Diego, Encanto and City Heights. The areas in or around military bases and most colleges also have a significant non-white population possibly reflecting the demographics of these institutions.

Figure A-55: Racial Demographics (ACS 2018) & RECAPS (HUD, 2009-2013)

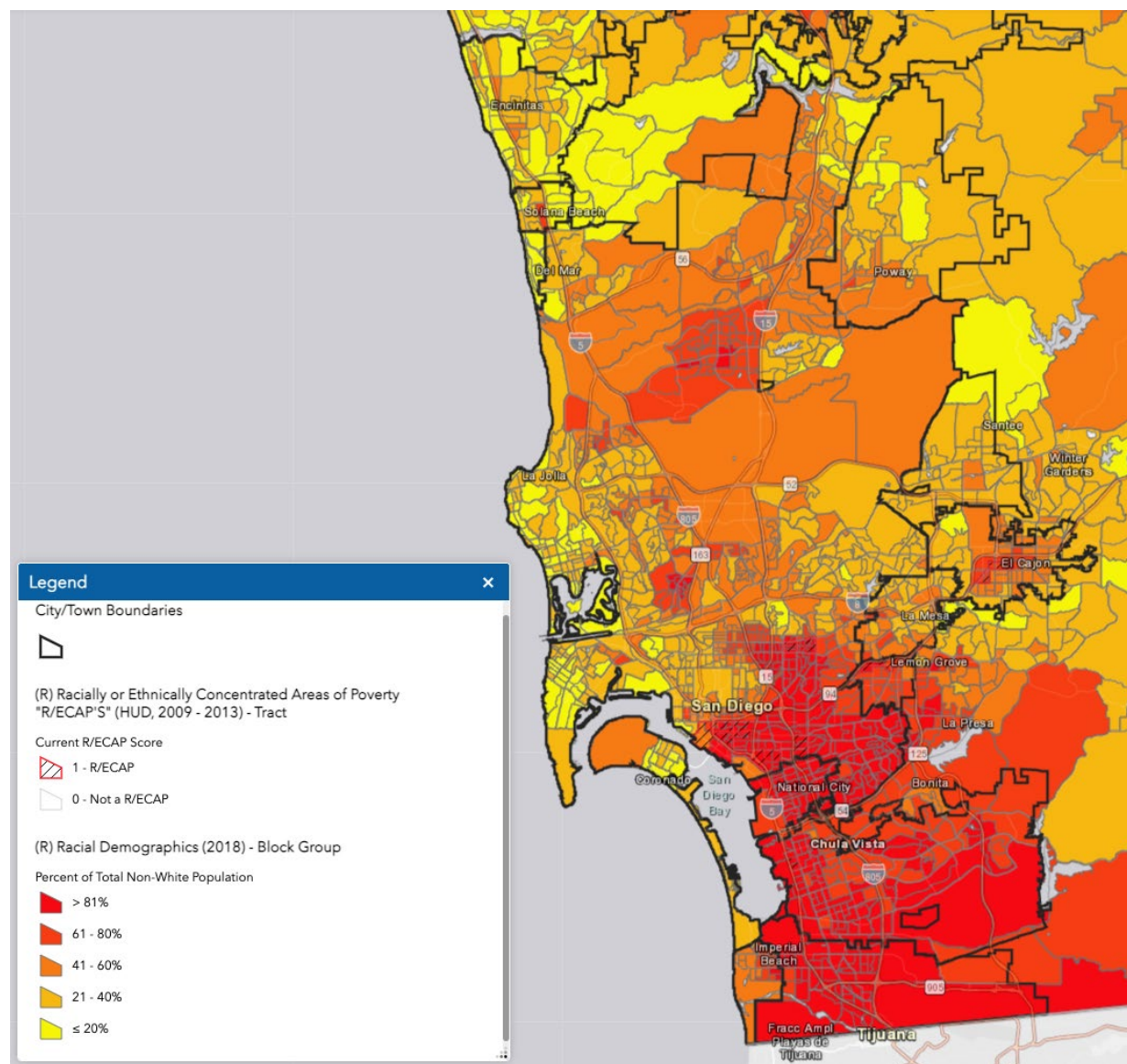


Table A-21 below shows that San Diego's median age groups are not projected to grow at the same rate. The population 65 years and older is projected to increase from 11 percent to 18 percent of the total population while the population 18 years and under is expected to decrease from 25 percent to 23 percent of total population. Within the senior population, the 75 years and older age group is expected to grow from 5.1 percent of the population to 9 percent of the population.

Table A-21: City of San Diego Age Distribution Projection Totals (2012-2035)

Total	2012		2035	
	Number	Percent	Number	Percent
Median Age	32.5	37.5		
19 and Under	332,263	25%	391,154	23%
65 and Older	146,883	11%	302,298	18%
Source: SANDAG Series 13 Regional Growth Forecast				

In 2017, approximately nine percent (122,831) of the City's population had a disability and approximately 31 percent of those age 65 and older had a disability. Among those under age 64, the largest proportion of disabilities is cognitive. Most of those aged 65 and older have an ambulatory disability. In 2017, the employment rate for those with a disability was 8.0 percent versus 3.3 percent for the overall labor force.

Figure A-56 below depicts the percent of total population with a disability. This figure can also serve as a proxy for areas with a larger senior population as disabilities can appear with age. The highest concentrations are within the Midway-Pacific Highway and Rancho Bernardo communities. The ten to twenty percent range is more prevalent and generally dispersed throughout the city - likely coincident with the senior population. Lower income populations are more likely to be located within the central and southern portions of the City, including Downtown.

Figure A-56: Population with a Disability (ACS, 2015-2019)

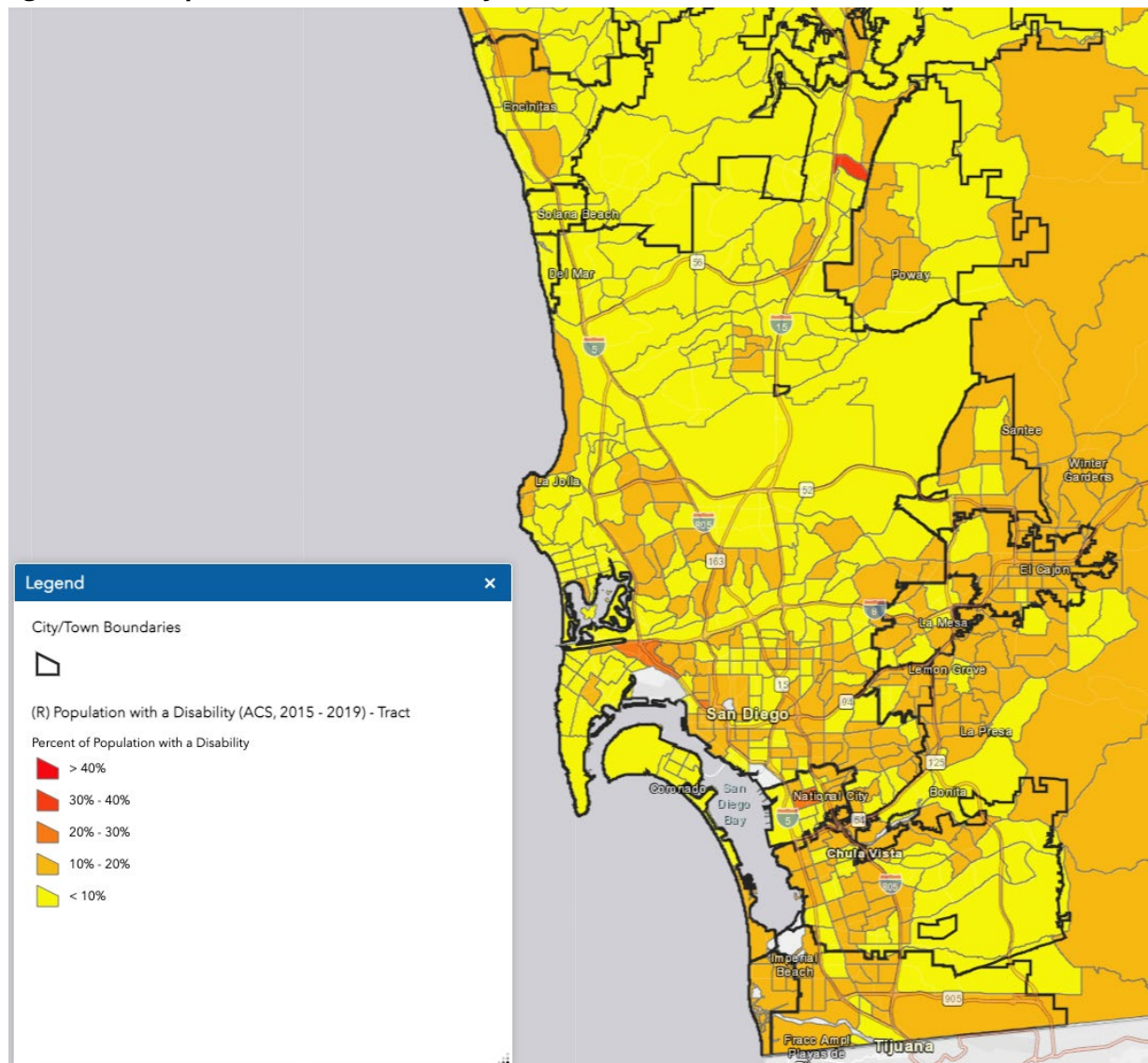


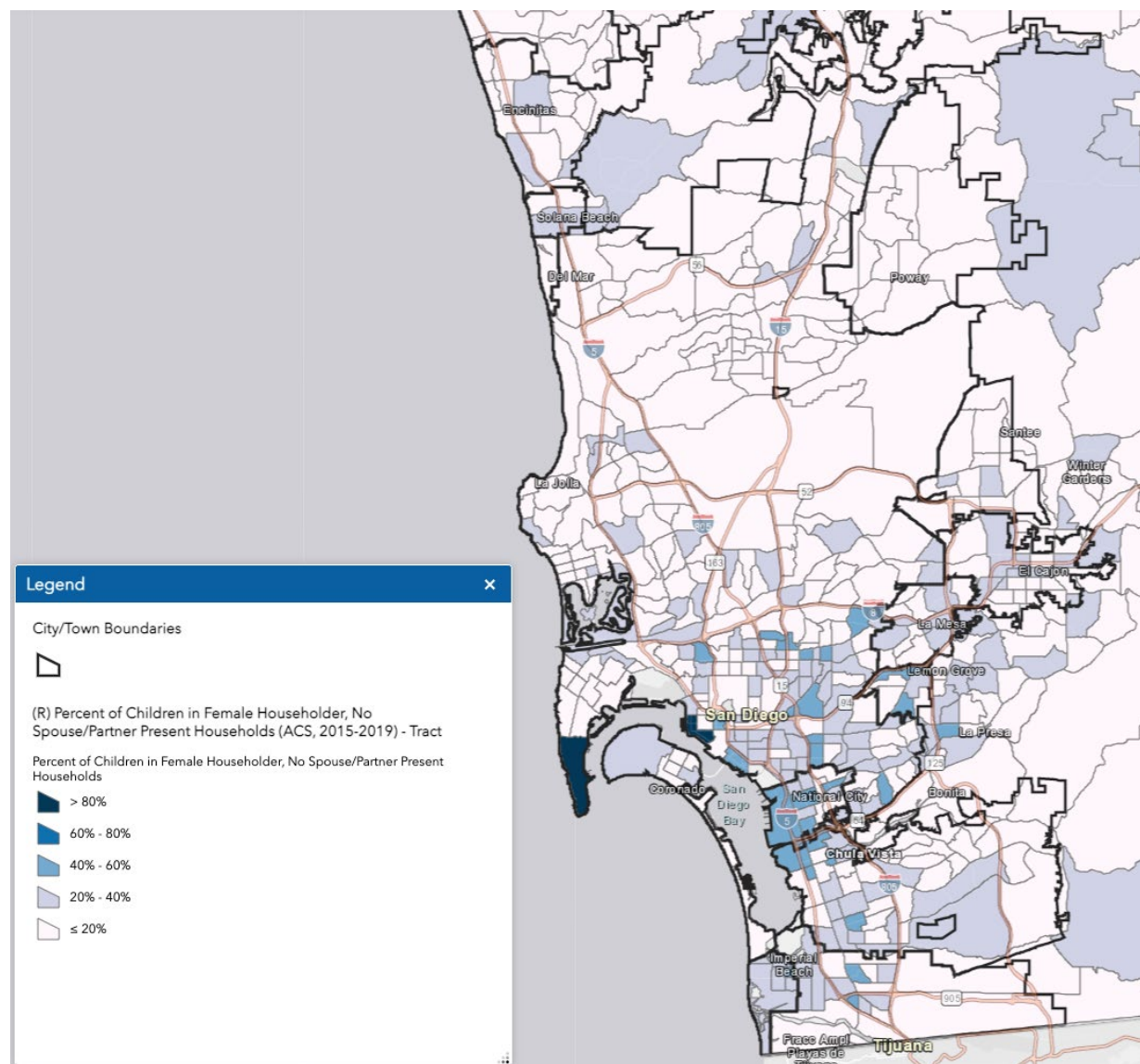
Table A-22 below shows the single-parent households with children under the age of 18. Female householders comprise a large majority (82.6 percent) of the city's single parent households.

Table A-22: City of San Diego Single-Parent Households with Children Under Age 18 (2017)

Households	Number	Percent
Total households with children under the age of 18	282,079	55.9%*
Single parent households	62,823	22.3%
Single households headed by women	51,899	82.6%
*Of all City households; Source: U.S. Census Bureau, American Community Survey 2017		

Figure A-57 below depicts percent of children in female householder households. The highest concentration is within the ten to twenty percent range and associated with Point Loma Naval base and several census tracts downtown. The other areas of higher concentrations are within the older neighborhoods of the urban core and populations within the Southeastern San Diego and City Heights communities that would be lower income.

Figure A-57: Percent of Children in Female Householder (ACS, 2015-2019)



Overcrowding

Low-income households disproportionately experience overcrowding.¹ Seniors,² large households,³ female-headed households,⁴ and Black and Hispanic households⁵ are more likely to be low- or moderate-income and renters. Therefore, it can be concluded that seniors, female-headed households, large households, and Black households, and Hispanic households are disproportionately experiencing overcrowding. It is also likely that persons with a disability are

disproportionately experiencing housing needs including overcrowding. Persons with a disability have a lower median income (\$26,760) than persons without a disability (\$40,834).⁶ Persons with a disability in San Diego County are also concentrated in RECAPs, minority concentration areas, and low and moderate income areas.⁷

Table A-23 below shows that 6.3 percent of total households experience overcrowding and of these, 2.2 percent of households experience severe overcrowding which is defined as more than 1.5 persons per room. Many large households experience overcrowding as they tend to have lower household income, higher household expenses and have fewer options to access adequately sized, affordable housing. In 2017, large households accounted for 10.5 percent of all households.

Table A-23: City of San Diego Overcrowding (2012-2017)

Type of Overcrowding	2012		2017	
	Number	Percent	Number	Percent
Overcrowded (>1 and < 1.5 persons/room)	18,839	4%	20,530	4.1%
Severely Overcrowded (>1.5 persons/room)	11,044	2.3%	10,881	2.2%
Source: U.S. Census Bureau, American Community Survey 2012 and 2017				

Table A-24 below shows that renter households are far more likely to face overcrowding than households that own their own dwelling units.

Table A-24: City of San Diego Overcrowding by Tenure (2017)

Number of Occupants Per Room	Owner Occupied Units	Renter Occupied Units
0.5 or less	169,277	126,048
0.51 to 1.00	61,061	111,569
1.01 to 1.50	5,401	17,772
1.51 to 2.00	1,034	9,622
2.01 or more	460	1,964
Total	237,233	266,975
Source: U.S. Census Bureau, American Community Survey 2017		

¹ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60

² 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 33

³ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 36

⁴ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 38

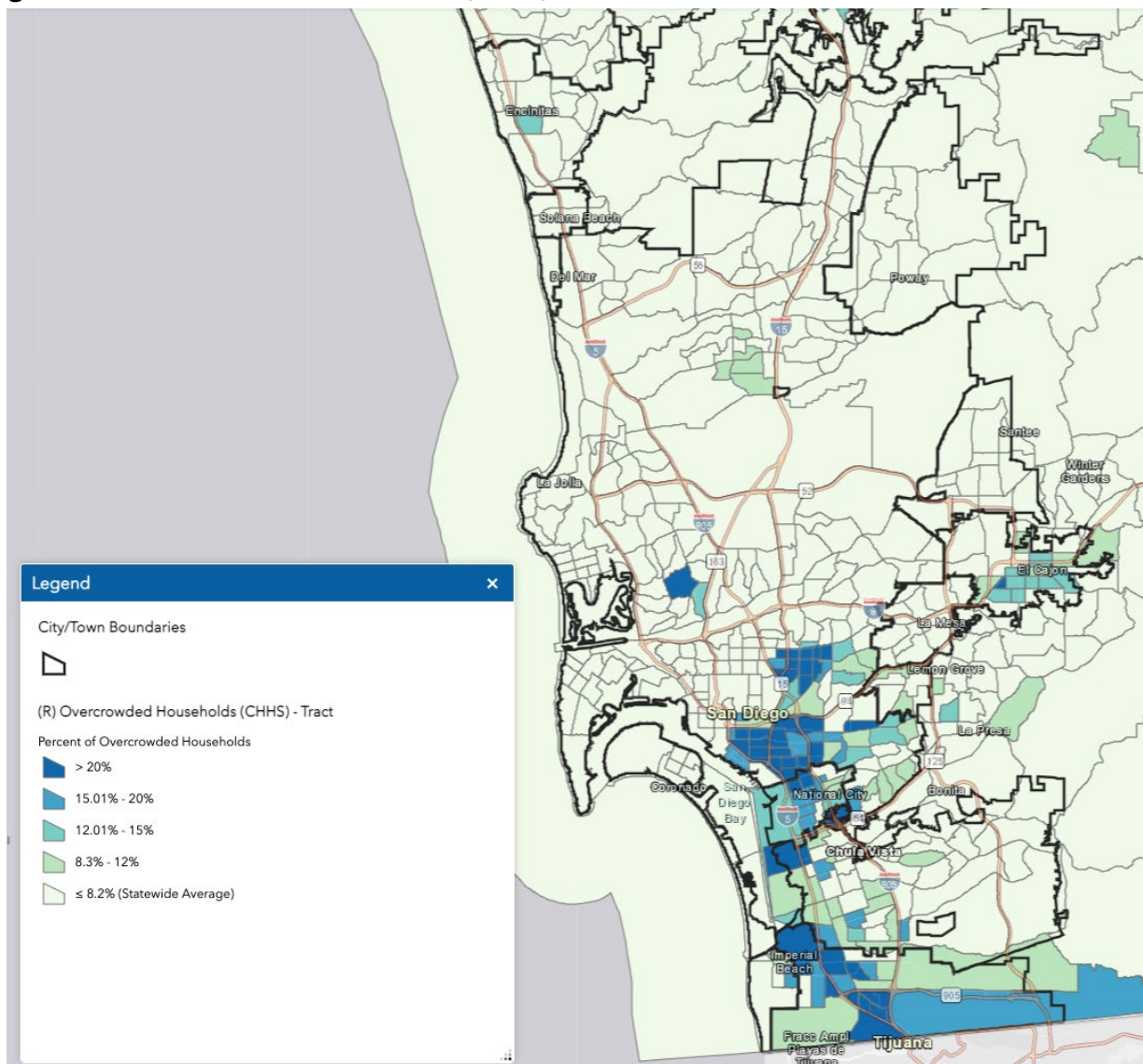
⁵ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60

⁶ U.S. Census, Latest ACS 5-Year Estimates, Detailed Table B18140

⁷ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pgs. 40, 44, 63

Figure A-58 below depicts the percent of overcrowded households with the local jurisdictions outlined (data is not available within San Diego County for the related category of Severely Overcrowded Households). Within the City of San Diego, the concentration of households that experience overcrowded housing is closely associated with lower income and non-white populations

Figure A-58: Overcrowded Households (CHHS)



Cost Burden and Severe Cost Burden

Low-income households disproportionately experience cost burden.⁸ Lower and moderate income households are not exclusively but are more likely to be renters, and renters are also more likely to experience housing problems such as cost burden.⁹ Seniors,¹⁰ large households,¹¹ female-headed households,¹² and Black and Hispanic households¹³ are more likely to be low- or moderate-income and renters. Therefore, it can be concluded that seniors, female-headed households, large

households, and Black households, and Hispanic households are disproportionately experiencing cost burden. It is also likely that persons with a disability are disproportionately experiencing cost burden. Persons with a disability have a lower median income (\$26,760) than persons without a disability (\$40,834).¹⁴ Persons with a disability in San Diego County are also concentrated in RECAPs, minority concentration areas, and low and moderate income areas.¹⁵

Table A-25 below shows approximately 44 percent of households spend more than 30 percent of their income on housing.

Table A-25: City of San Diego Gross Rent/Mortgage as Percentage of Household Income (2017)

	Renter Occupied Units	Owner Occupied Units
Less than 30 Percent of Income	115,285	156,355
30 Percent or More of Income	137,603	74,572
Source: U.S. Census Bureau, American Community Survey 2017		

Of these, Table A-26 shows that 52 percent of renter households pay 30 percent or more of their household income towards rent.

Table A-26: City of San Diego Population by Race and Ethnicity (2012-2035)

Occupied Units Paying Rent	Number	Percent
Less than 30 percent	115,285	43.6%
30 percent or more	137,603	52%
Source: U.S. Census Bureau, American Community Survey 2017		

The percent of households in renter – occupied housing units is depicted by Figure A-59 below with the local jurisdictions outlined. The map illustrates a relatively dispersed pattern of renter – occupied housing units within the City of San Diego with concentrations of both renter and owner-occupied units in specific parts of the City.

⁸ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60

⁹ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60, 70

¹⁰ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 33

¹¹ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 36

¹² 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 38

¹³ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60

¹⁴ U.S. Census, Latest ACS 5-Year Estimates, Detailed Table B18140

¹⁵ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pgs. 40, 44, 63

Legend

City/Town Boundaries

(R) Percent of households in renter - occupied housing units (HUD) - Tract

Percent of households in renter-occupied housing units

- > 80%
- 60% - 80%
- 40% - 60%
- 20% - 40%
- ≤ 20 %

Figure A-60: Overpayment by Renters (ACS, 2015-2019)

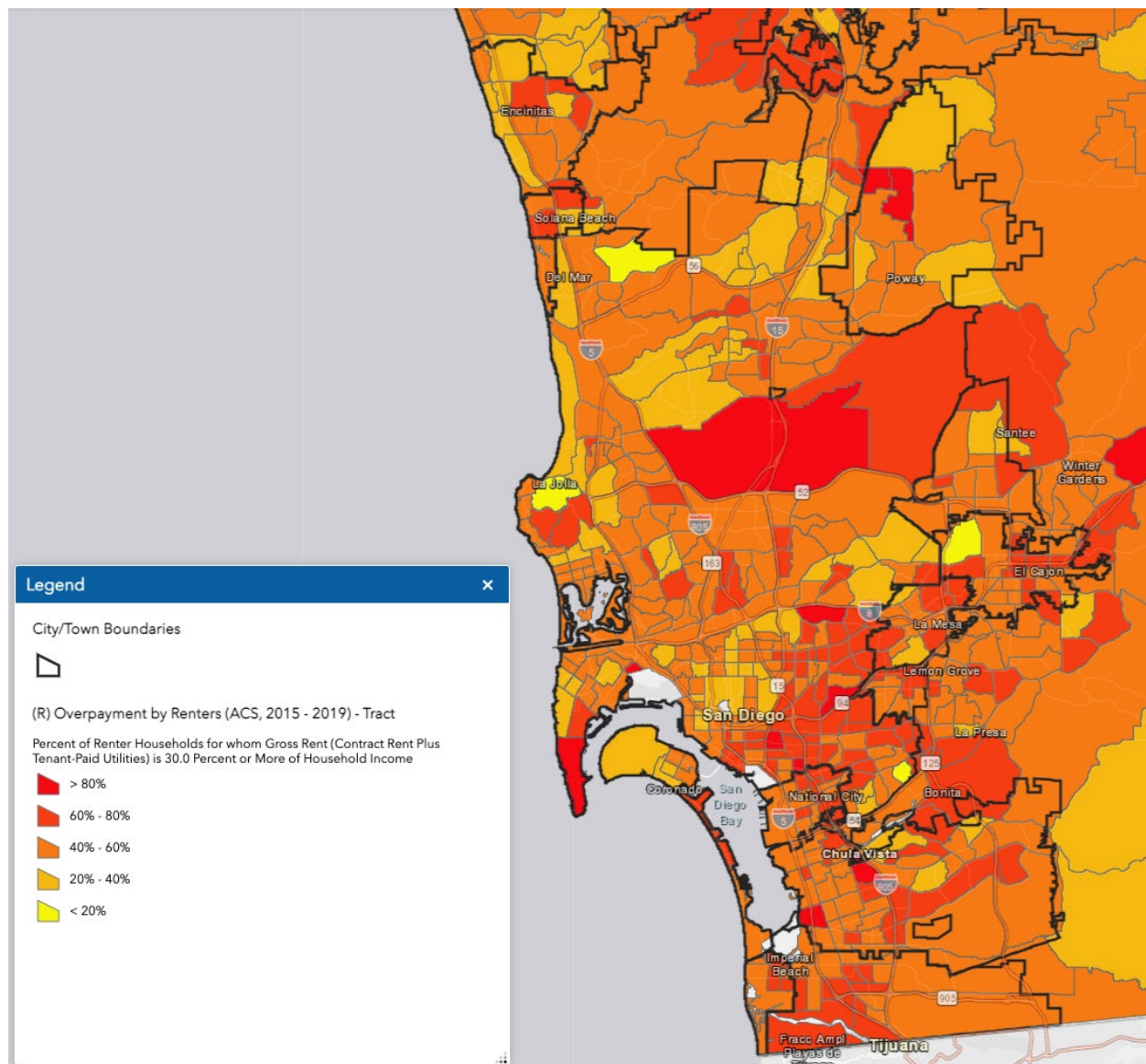


Figure A-61 below depicts the percent of renter households within the 2010-2014 timeframe that paid gross rent (contract rent plus tenant-paid utilities) of 30 percent or more of household income. Comparison of the two maps indicate many census tracts within a broad portion of the City of San Diego have increased one range during the timeframe as rent increases outpace increases to household incomes. Generally, in 2019 most census tracts within the City have 40 percent or more renter households with overpayment of rents. Within specific communities, several coastal, near coastal and northern communities show a shifting within nearby census tracts either up or down a range. Several central communities including and outside of Downtown, Southeastern San Diego, North Park and Normal Heights show a decrease in overpayment within specific census tracts which could be a result of a gentrification trend and indicate a need to address housing insecurity and displacement of low income and non-white populations within these communities.

Figure A-61: Overpayment by Renters (ACS, 2010-2014)

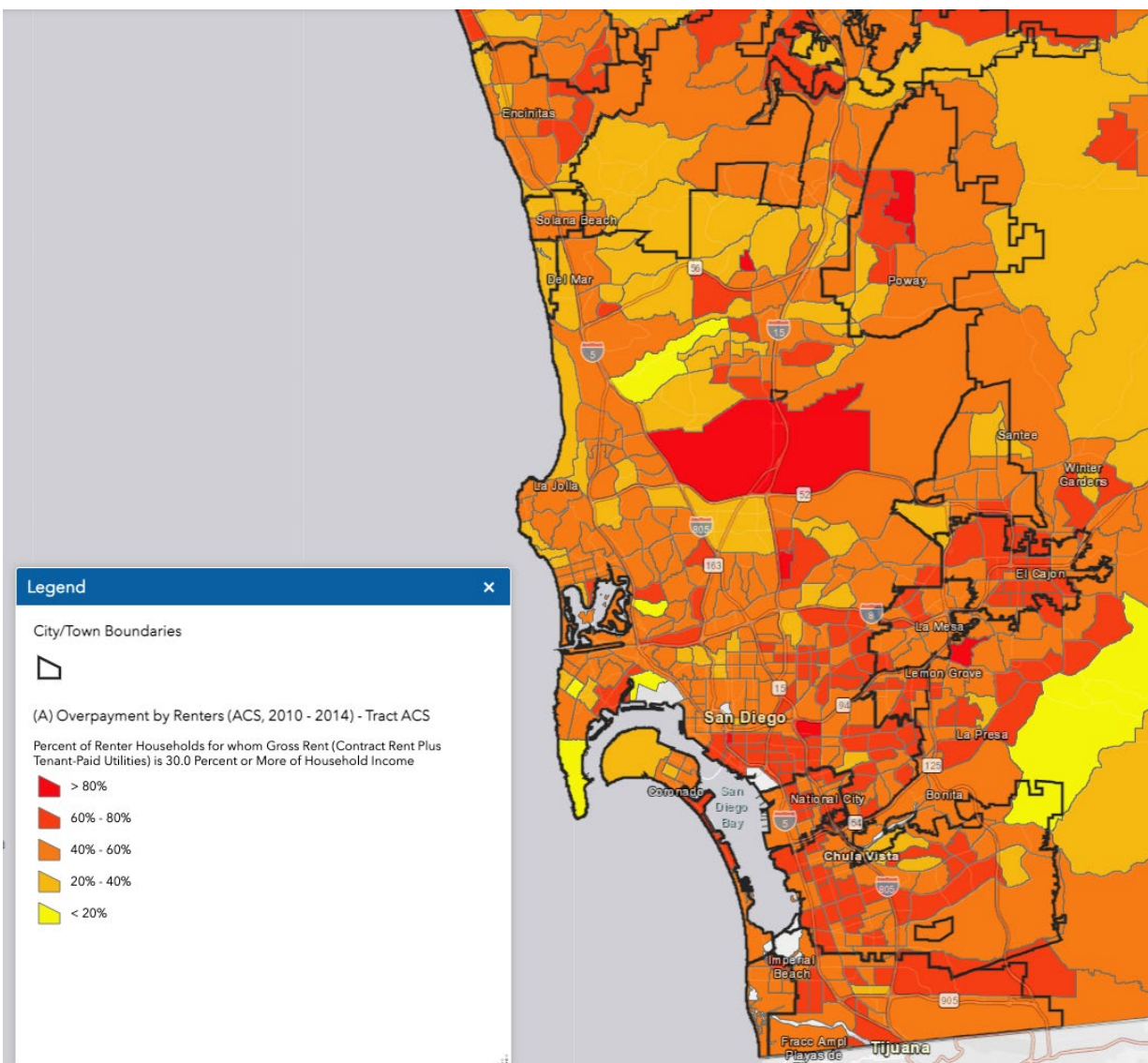
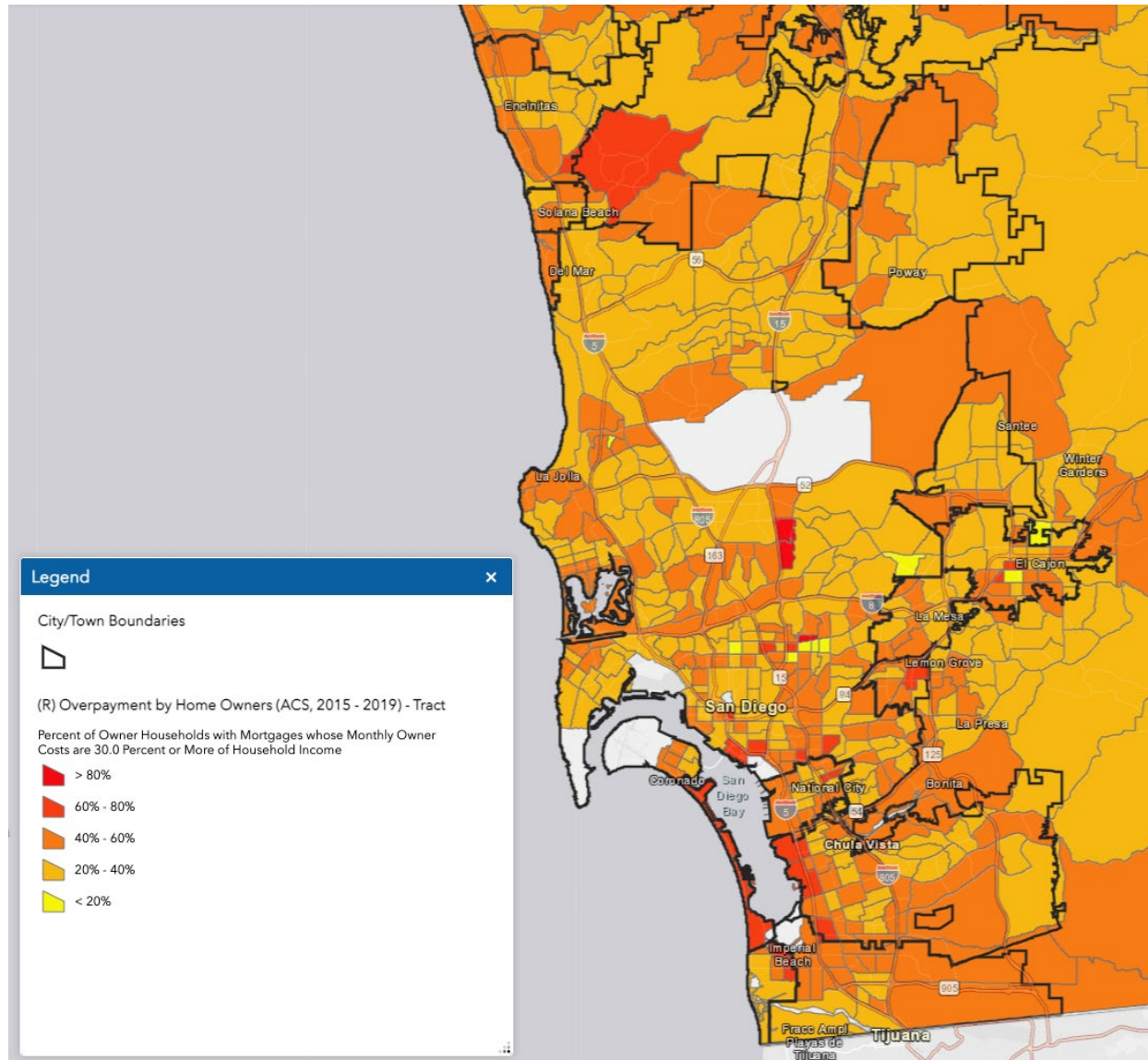


Figure A-62 below depicts the percent of homeowner households within the 2015-2019 timeframe that paid gross rent (contract rent plus tenant-paid utilities) of 30 percent or more of household income.

Figure A-62: Overpayment by Homeowners (ACS, 2015-2019)



Substandard Housing

Low-income households disproportionately experience lack of complete kitchen and lack of complete bathroom.¹⁶ Lower and moderate income households are more likely to be renters, and renters are also more likely to experience substandard housing conditions.¹⁷ Seniors,¹⁸ large households,¹⁹ female-headed households,²⁰ and Black and Hispanic households²¹ are more likely to be low- or moderate-income and renters. Therefore, it can be concluded that seniors, female-headed households, large households, and Black households, and Hispanic households are disproportionately experiencing lack of complete kitchen and lack of complete bathroom. It is also likely that persons with a disability are disproportionately experiencing housing needs including lack of complete kitchen and lack of complete bathroom. Persons with a disability have a lower median income (\$26,760) than persons without a disability (\$40,834).²² Persons with a disability in San Diego County are also concentrated in RECAPs, minority concentration areas, and low and moderate income areas.²³

Figures A-63, A-64, and A-65 below depict the percent of extremely low, low, and moderate income households with substandard housing. Concentrations of substandard housing for each income group are dispersed throughout the City of San Diego and the region with a cluster of census tracts in Downtown San Diego.

¹⁶ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60

¹⁷ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60, 70

¹⁸ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 33

¹⁹ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 36

²⁰ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 38

²¹ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60

²² U.S. Census, Latest ACS 5-Year Estimates, Detailed Table B18140

²³ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pgs. 40, 44, 63

Figure A-63: Percent of Extremely Low Income Households with Substandard Housing (HUD CPD Maps)

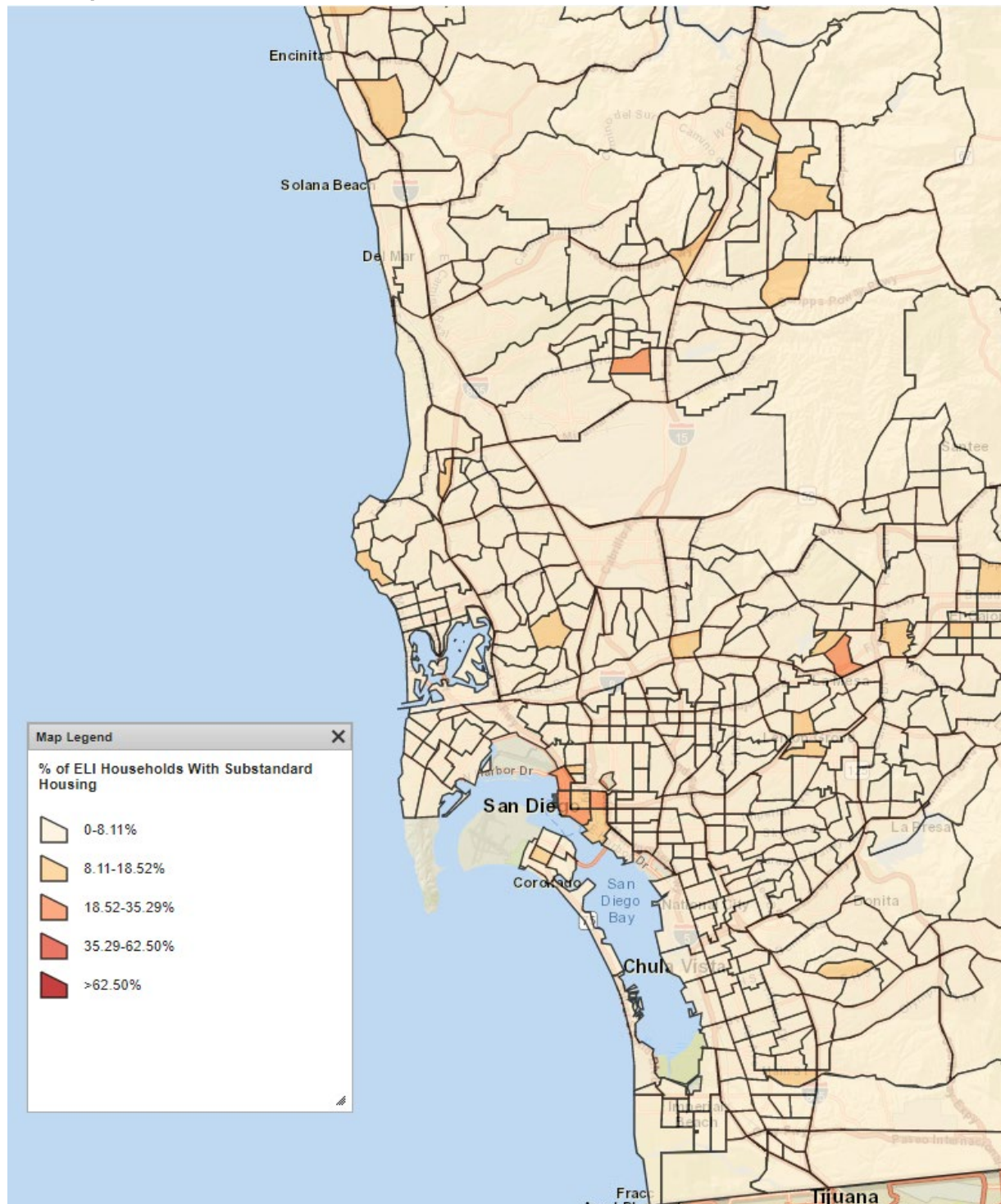


Figure A-64: Percent of Low Income Households with Substandard Housing (HUD CPD Maps)

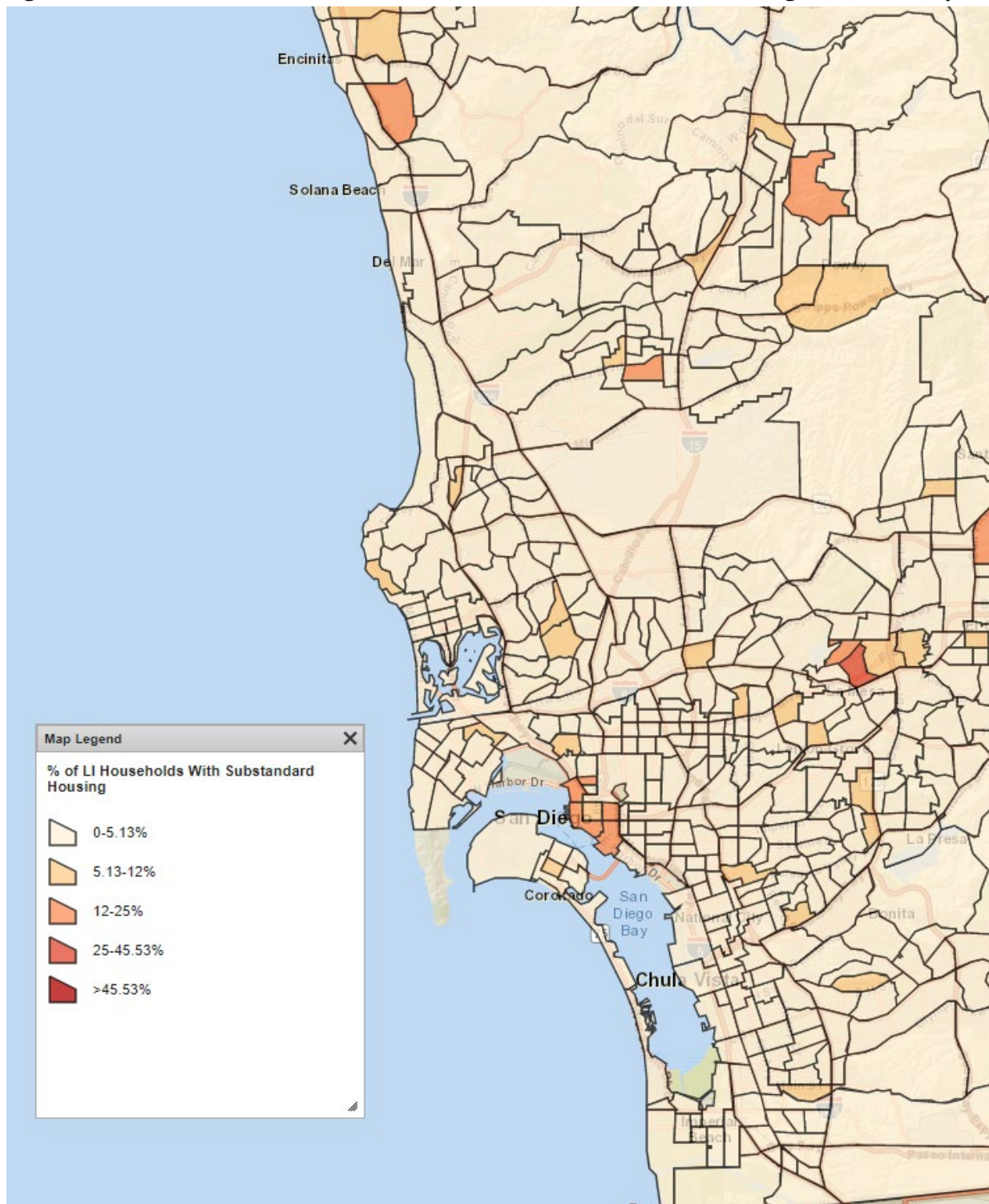
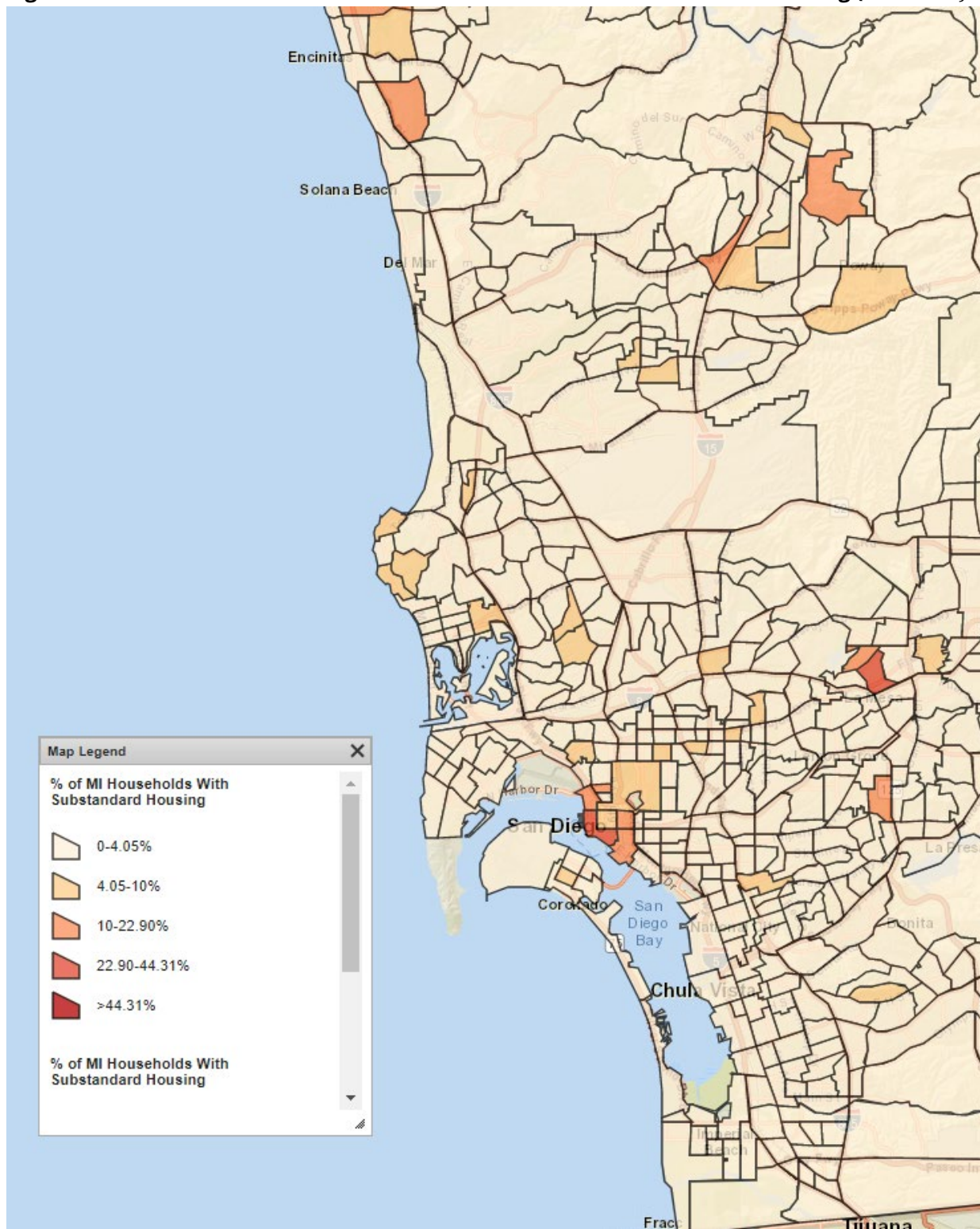


Figure A-65: Percent of Moderate Income Households with Substandard Housing (HUD CPD)



Homelessness

Various techniques exist to measure the homeless population, characterize the demographics of unsheltered people, and to identify the needs of persons experiencing homelessness. The Annual Homeless Assessment Report (AHAR) is a report to the U.S. Congress that provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The data compiled for San Diego in 2017 provides demographic information for both individuals and families. The majority of individuals in emergency shelters, transitional housing, and permanent supportive housing are those with disabilities. Veteran status is also reported and ranges from 19 to 39 percent for adult individuals in emergency shelters and transitional housing. More than 51 percent of the individuals in permanent support housing are veterans. In the case of families in emergency shelters, transitional housing, and supportive housing, there are more female head of households. Across all housing types, the majority of people (36 percent) are white (non-Hispanic and Hispanic) while white (Hispanic) and Black are each more than 20 percent of the population.

Table A-27: Breakdown of Race in the City of San Diego in 2017

Race	Emergency Shelters for Families	Emergency Shelters for Individuals	Transitional Housing For Families	Transitional Housing For Individuals	Permanent Supportive Housing For Families	Permanent Supportive Housing For Individuals
White, Non-Hispanic/ Non-Latino	240	1,607	108	888	54	933
White, Hispanic/ Latino	731	710	271	344	142	248
Black or African-American	605	1,043	196	446	176	556
Asian	18	61	5	27	8	45
American Indian or Alaska Native	18	93	5	38	3	31
Native Hawaiian or Pacific Islander	24	45	6	24	1	18
Multiple races	118	216	62	120	96	241
Missing this information	30	34	6	7	1	10
Total	1,784	3,809	659	1,904	481	2,082
Source: AHAR, 2017: https://www.rtfhsd.org/wp-content/uploads/2018/01/2017AHAR.pdf						

Since 2006, the Regional Task Force on the Homeless (RTFH) has conducted annual counts of those experiencing homelessness throughout the region, known as a point-in-time survey (PIT). Mandated by the U.S. Department of Housing and Urban Development (HUD), this annual count provides an estimate of the number of homeless persons living “on the street” or staying in homeless shelters. According to the information summarized in the AI, the point-in-time count is just a snapshot of how many homeless people are on streets and in emergency and transitional shelters on any given day in the San Diego region. RTFH estimated that over the course of the year more than 20,000 people experience homelessness in San Diego County.

The 2019 San Diego Regional Homeless Point-In-Time Count identified more than 8,000 homeless persons living in San Diego County. Of the homeless persons counted, more than half (55 percent) were unsheltered – living in a place not meant for human habitation, while 25 percent were in an emergency shelter and 19 percent in a transitional housing program. (AI, page 48) When examining the different sub-regions within San Diego County, the City of San Diego had the largest proportion of the homeless persons. With over 5,000 of those individuals counted within the City of San Diego, those experiencing homelessness in the City accounted for 63 percent of the total regional homeless population.

Table A-28. San Diego Region Count of People Experiencing Homelessness (2019 RTFH San Diego Point in Time Count Annual Report)

Status	City of San Diego	San Diego Region
Sheltered Persons	2,600	3,626
Unsheltered Persons	2,482	4,476
Total	5,082	8,102

The number of homeless people in the City counted for the 2019 the annual event was an increase from the point in time count conducted in 2018 which had a total of 4,912 people. Of these, there were a higher number of people who were unsheltered compared to the 2019 count. The majority of sheltered homeless people counted in 2018 were in an emergency shelter, followed by those in transitional housing. The majority of unsheltered people counted were on their own followed by those who were in tents or hand-built structures and then living in a vehicle. Looking closer at the results of the 2018 count for unsheltered people indicate that the majority (26 percent) of those counted are female adults without children followed by homeless youth and families (21 percent).

Table A-29. City of San Diego Sheltered and Unsheltered People Experiencing Homelessness (2018 RTFH San Diego Point in Time Count Annual Report)

Status	Category	Total	Percent
Sheltered	Emergency Shelter	1,467	30%
	Transitional Housing	759	15%
	Safe Haven	56	1%
	<i>Subtotal</i>	2,282	
Unsheltered	Individual	1,474	30%
	Vehicle	505	10%
	Tents / Hand-Built Structures	651	15%
	<i>Subtotal</i>	2,630	
Total		4,912	

Table A-30. City of San Diego Unsheltered People Experiencing Homelessness by Household Type (2018 RTFH San Diego Point in Time Count Annual Report)

Household Type	Number
Unsheltered homeless persons (total observed)	2,630
Unsheltered homeless youth and persons in families	551
Unsheltered female homeless adults without children	682
Unsheltered veteran homeless adults without children	367

During the Point-in-Time Count, homeless shelter providers submit subpopulation descriptors for each homeless person counted, while unsheltered homeless persons within each subpopulation were estimated based on survey data responses. The various categories are listed below and only include those experiencing homelessness that are unsheltered. Due to the amount of data submitted in aggregate, a breakdown of the sheltered subpopulations by additional data (i.e., household type or gender) is not available. Additionally, developmental disability data is not captured sufficiently to describe the full sheltered population and is not included here.

- *Chronically Homeless Individuals.* An unaccompanied homeless individual with a disabling condition who has either been continuously homeless for a year or more, or who has had at least four episodes of homelessness in the past three years. The chronic homeless population in the City is estimated to be 708.
- *Veterans.* San Diego has a large military presence. Some veterans suffer from post-traumatic stress disorder, which causes disturbing memories, flashbacks or nightmares. An estimated 1,312 homeless (sheltered and unsheltered) veterans reside in the City.
- *Those on Probation or Parole.* Those who are on probation or parole may struggle to find housing due to strict tenant screenings that may include criminal records. There were 367 individuals experiencing homelessness in the City who were on probation or parole.
- *Females.* Females experiencing homelessness often face unique challenges, including increased risk of violence. There were 682 females counted as experiencing homelessness in 2018.

- *Families.* Nine percent of the unsheltered population of those experiencing homelessness consisted of families, comprising of 236 total individuals.
- *Unaccompanied Youth.* During the 2018 Point-in-Time Count, 315 youth were counted as experiencing homelessness in the City.

Table A-31. City of San Diego People Experiencing Homelessness by Subpopulation (2018)

Category	Number	Percent
Chronically Homeless	708	14
Veteran	367	14
On Probation or Parole	367	14
Female	682	26
Families	236	9
Youth	315	12
Source: U.S. Census Bureau, American Community Survey 2017		

When considering the demographics of this population based on the information collected in the annual count, the following statistics are for the entire San Diego region, which includes the data collected in the City through the 2018 Point-in-Time Count where a majority of those counted reside.

- 74 percent of those experiencing homelessness that are unsheltered became homeless in the San Diego region.
- 14 percent of the unsheltered population of those experiencing homelessness suffer from substance abuse and nine percent suffer from alcohol abuse.
- 35 percent of those who are experiencing homeless and are unsheltered are 55 years of age or older.

San Diego's Continuum of Care programs for homeless persons consist of a network of emergency and transitional shelters. In addition, permanent supportive housing programs for previously homeless persons are also major components of the region's network of care.

- **Emergency Shelters.** Provide a place to sleep for the night. By providing a short term crisis option, these shelters are often the first step to finding a permanent housing solution.
- **Transitional Housing.** Provides longer-term shelter solutions through temporary housing options that can last up to 24 months and includes supportive services, such as case Management.
- **Permanent Supportive Housing (PSH).** Provides long-term housing with wraparound services that are meant to support the stability and health of individuals experiencing homelessness.
- **Homeless Prevention and Rapid Re-Housing.** San Diego's key strategy for preventing homelessness is through increased affordable housing options, which has been difficult to provide due to economic trends and an overall shortage of housing. Rapid Re-Housing reconnects families and individuals to a housing option as quickly as possible using housing

vouchers and rental assistance. It is a more stable and cost-effective way to house people than using Emergency Shelters.

Regional Patterns and Trends

Due to the City of San Diego's large geographic and population size, regional job centers and broad demographics, housing trends in the City can inform regional trends as well as be formed by them.

Figure A-66 illustrates the proximity between housing and jobs within the region. The trend is for jobs to locate mainly in the coastal and northern portions of the City of San Diego and within jurisdictions in northern San Diego County. Due to San Diego's geographic extent - from the international border the City of Escondido on the north - City residents experience a wide range of proximity to jobs. There is a predominant south to north commute to jobs. This has implications for future housing construction as well as the location of future employment within the region.

Figure A-66: Jobs Proximity Index (HUD, 2014-2017)

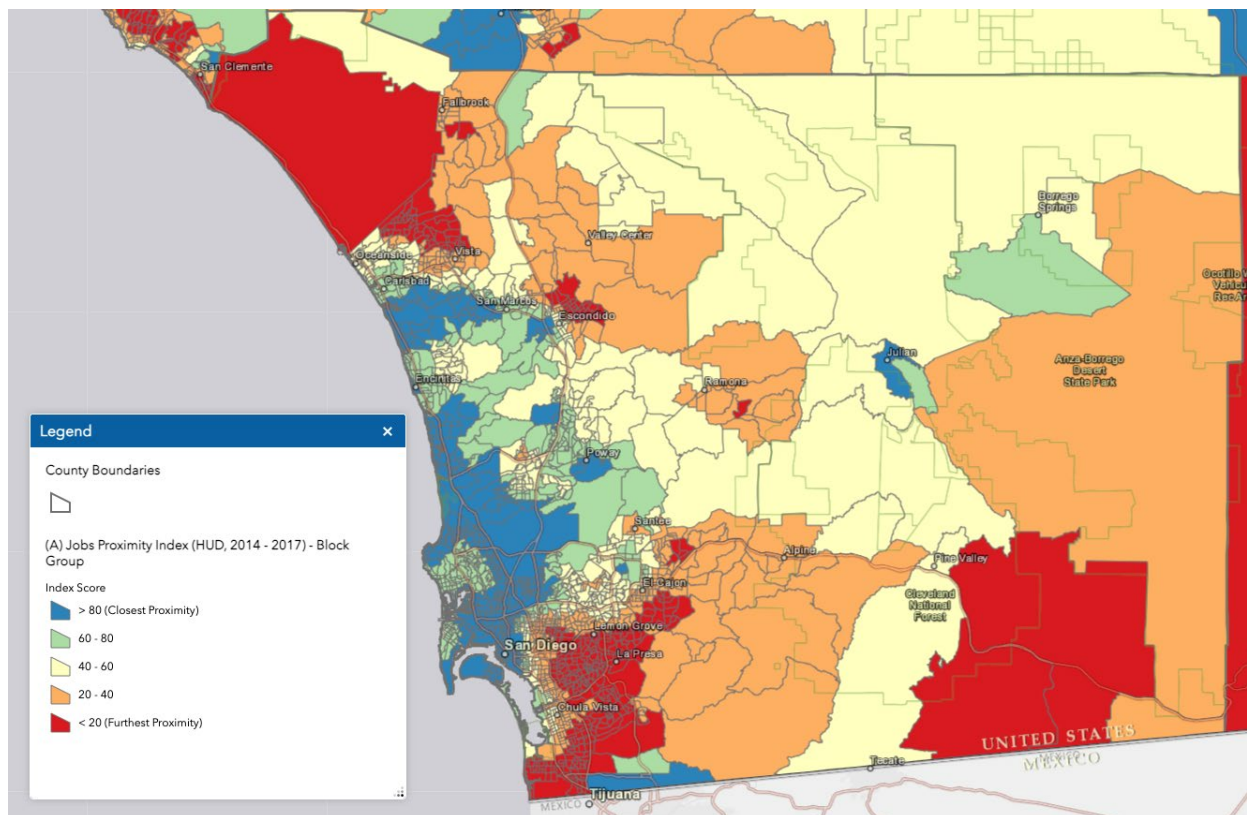
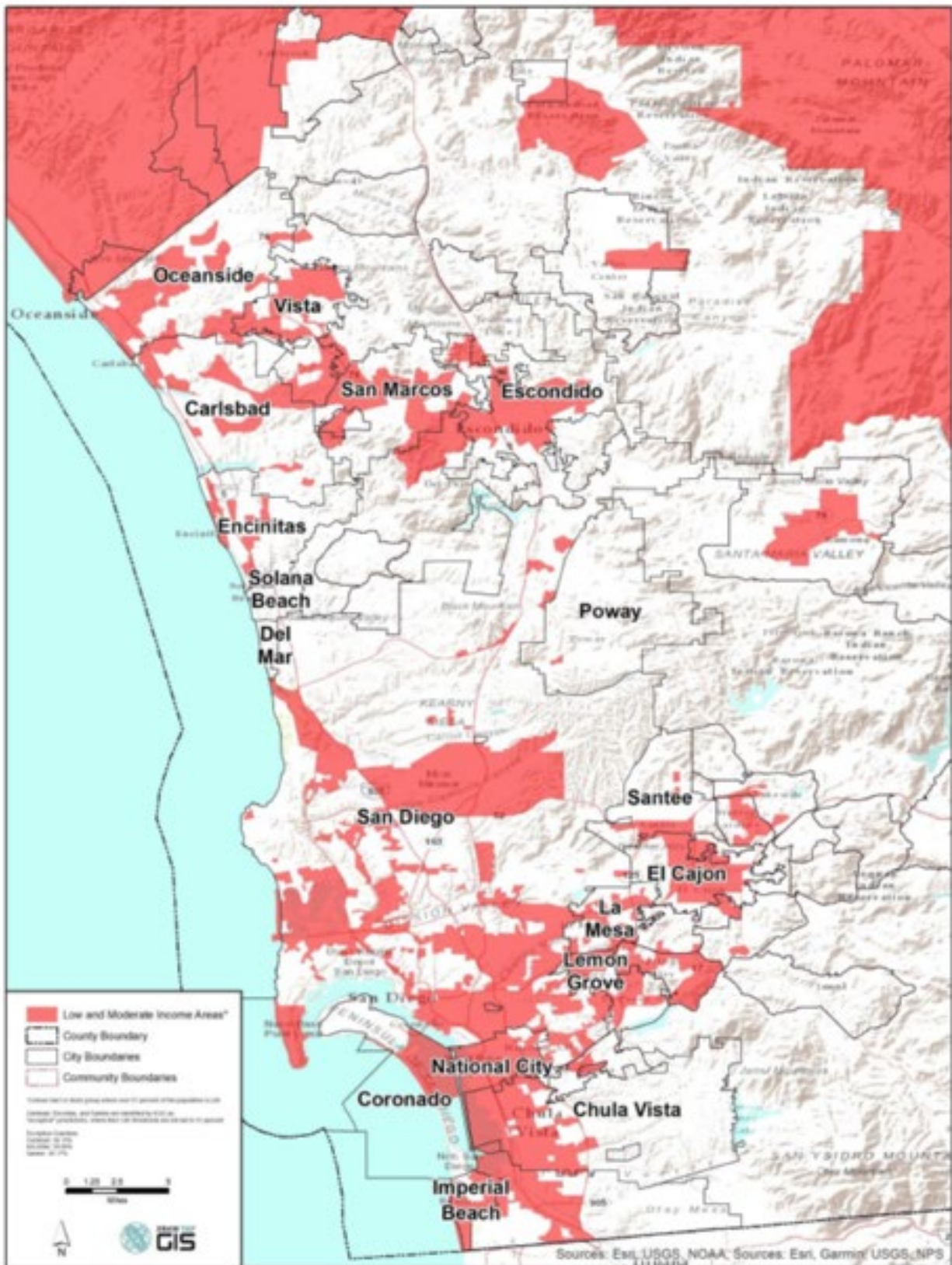


Figure A-67 shows the geographic concentration of low and low-moderate income households in San Diego County (areas where the proportion is greater than that countywide). Low and low-moderate income areas, are clustered in three general areas of the County. In North County, concentrations can be seen in the cities of Oceanside, San Marcos, Escondido, Carlsbad and Encinitas. In the southern portion of the county, concentrations can be seen in the central areas of the City of San Diego.

Figure A-67: Low and Moderate Income Areas (Captured from SDAI)

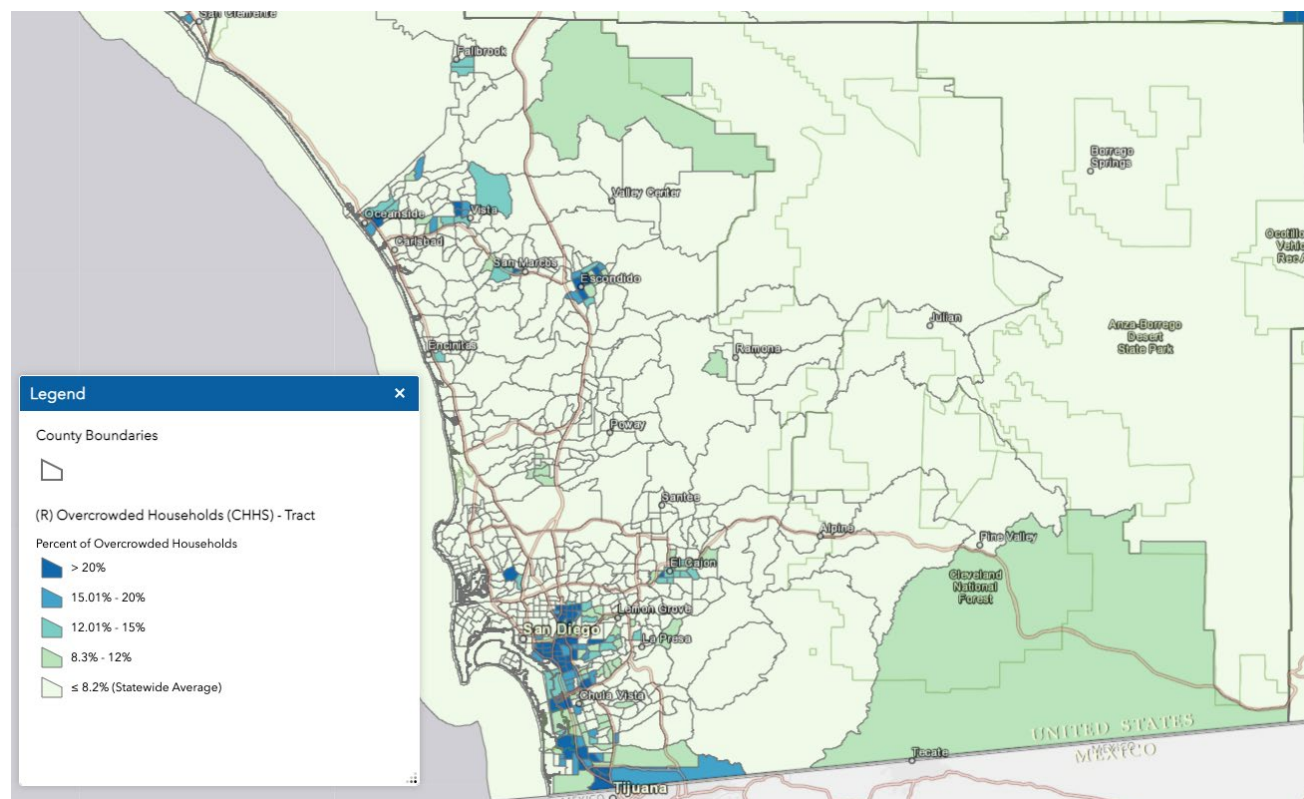


Overcrowding

According to State and federal guidelines, overcrowding is defined as a housing unit with more than one person per room, including dining and living rooms but excluding bathrooms, kitchens, and porches; and severe overcrowding is a unit with more than 1.5 persons per room. Household overcrowding is reflective of various living situations: (1) a family lives in a home that is too small; (2) a family chooses to house extended family members; or (3) unrelated individuals or families residing together to afford housing. Cultural preferences can also contribute to the overcrowded conditions.

Not only is overcrowding a potential fair housing concern, it can potentially strain physical facilities and public services and accelerate the deterioration of homes. As a result, some landlords or apartment managers may be more hesitant to rent to larger families, thus making access to adequate housing even more difficult. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding, or if policies aimed to limit overcrowding have a disparate impact on specific racial or ethnic groups with a higher proportion of overcrowding. For example, 2013-2017 ACS data shows that seven percent of housing units in the county were overcrowded compared with 17 percent for units with a Hispanic head of household. According to local fair housing service providers and property managers, addressing the issue of large households is complex as there are no set of guidelines for determining the maximum capacity for a unit. According to the 2014-2018 ACS, approximately 12 percent of households or 132,588 households in San Diego County had five or more people in 2018, and 11 percent of owners and 12.5 percent of renters were large households.

Figure A-68: Overcrowded Households (CHHS)



Approximately 7 percent of all households in San Diego County were affected by overcrowding while two percent experienced severe overcrowding. The prevalence of overcrowding varies among jurisdictions, with the lowest percentage of overall overcrowding occurring in Del Mar (no overcrowded or severely overcrowded units). National City and Escondido had approximately twice the county's proportion of overcrowded units. El Cajon, Vista, and Imperial Beach also had high levels of overcrowding. These jurisdictions also had high proportions of minority residents and lower median incomes. Table A-32 shows that overcrowding is much more prevalent among renter households than among owner households.

Table A-32: Overcrowding by Tenure (San Diego Region, ACS, 2013-2017)

Jurisdiction	Overcrowded (1+ occupants per room)			Severely Overcrowded (1.5+ occupants per room)		
	Renter	Owner	Total	Renter	Owner	Total
Urban County						
Coronado	2.3%	0.6%	1.5%	1.7%	0.0%	0.8%
Del Mar	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Imperial Beach	14.1%	2.4%	10.4%	4.4%	0.7%	3.2%
Lemon Grove	8.5%	4.7%	6.4%	3.6%	1.5%	2.5%
Poway	9.3%	1.6%	3.6%	3.6%	0.3%	1.1%
Solana Beach	1.8%	0.8%	1.2%	1.2%	0.0%	0.5%
Unincorporated	9.1%	2.5%	4.6%	3.0%	0.6%	1.4%
Total Urban County	8.7%	2.4%	4.6%	3.0%	0.6%	1.4%
Entitlement Cities						
Carlsbad	3.7%	1.2%	2.1%	0.8%	0.3%	0.4%
Chula Vista	17.1%	4.4%	9.8%	5.5%	0.9%	2.9%
El Cajon	17.6%	3.2%	12.1%	4.1%	0.9%	2.9%
Encinitas	7.1%	1.2%	3.4%	2.7%	0.5%	1.3%
Escondido	21.7%	6.1%	14.0%	9.3%	1.4%	5.3%
La Mesa	6.0%	1.7%	4.2%	2.7%	0.6%	1.9%
National City	17.2%	9.2%	14.6%	5.7%	2.7%	4.7%
Oceanside	8.6%	1.9%	4.8%	2.4%	0.6%	1.4%
San Diego	9.5%	2.7%	6.3%	3.5%	0.7%	2.2%
San Marcos	11.6%	2.5%	6.0%	3.4%	0.8%	1.8%
Santee	5.5%	1.2%	2.5%	0.2%	0.2%	0.2%
Vista	17.9%	4.1%	11.1%	6.1%	1.2%	3.7%
Total County	10.8%	2.8%	6.5%	3.7%	0.7%	2.1%

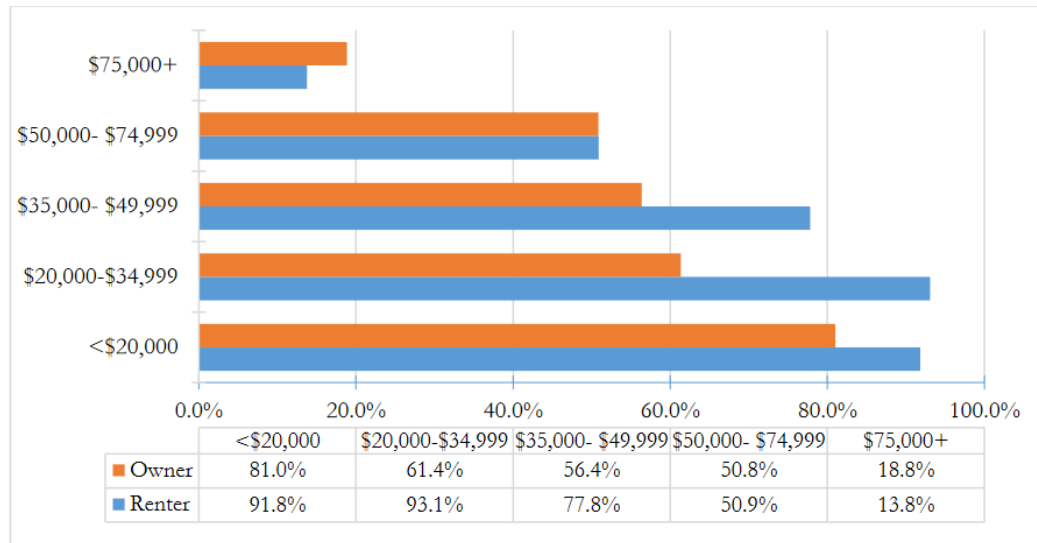
Cost Burden and Severe Cost Burden

According to HUD's 2012-2016 Comprehensive Housing Affordability Strategy (CHAS) data, close to 20 percent of households in San Diego County paid more than half their income on housing. As cost of living is consistently on the rise, housing affordability drops, and lower-income families are most acutely affected.

State and Federal standards specify that a household experiences housing cost burden if it pays more than 30 percent of its gross income on housing – typically a point at which housing costs

become burdensome and may affect the ability to comfortably make monthly rent or mortgage payments and/or maintain a decent standard of living. Housing cost burden is typically linked to income levels. The lower the income, the larger percentage of a household's income is allotted to housing costs. Cost burden by low income households tends to occur when housing cost increases faster than income. Figure A-69 below shows how the housing cost burden for owner- and renter-households is influenced by household income. As shown, as income increases, the proportion of households experiencing cost burden decreases.

Figure A-69: Housing Cost Burden by Income and Tenure



Source: American Community Survey (ACS), 2013-2017.

The California Housing Partnership estimated that in 2018, renters needed to earn \$38.31 per hour (three times the minimum wage) to afford the median monthly asking rate of \$1,992. Rents increase in response to demand and more renter households have entered the San Diego market since 2006, many because of displacement during the foreclosure crisis. As a result, the estimated average rental costs in San Diego County increased by an average of 33 percent between Fall 2014 and Fall 2018, according to the San Diego County Apartment Association's biannual rental rate reports. Broken down by unit size, the percent increase in rent between 2014 and 2018 was 34 percent for a studio, 47 percent for a one-bedroom, 28 percent for a two-bedroom, and 22 percent for a three-bedroom unit. Among communities with data for one-, two-, and three-bedroom units, Imperial Beach had the lowest average rents in the region and highest rents were observed in Del Mar and Solana Beach.

Figure A-70 below depicts the location affordability index scores for areas within the San Diego County region. Areas with lower rent and greater affordability are within coastal, central and southern portions of the City of San Diego generally in locations with more apartments and condominiums than single-family homes and also within inland locations and rural communities within the region.

Figure A-70: Location Affordability Index (HUD) - Region

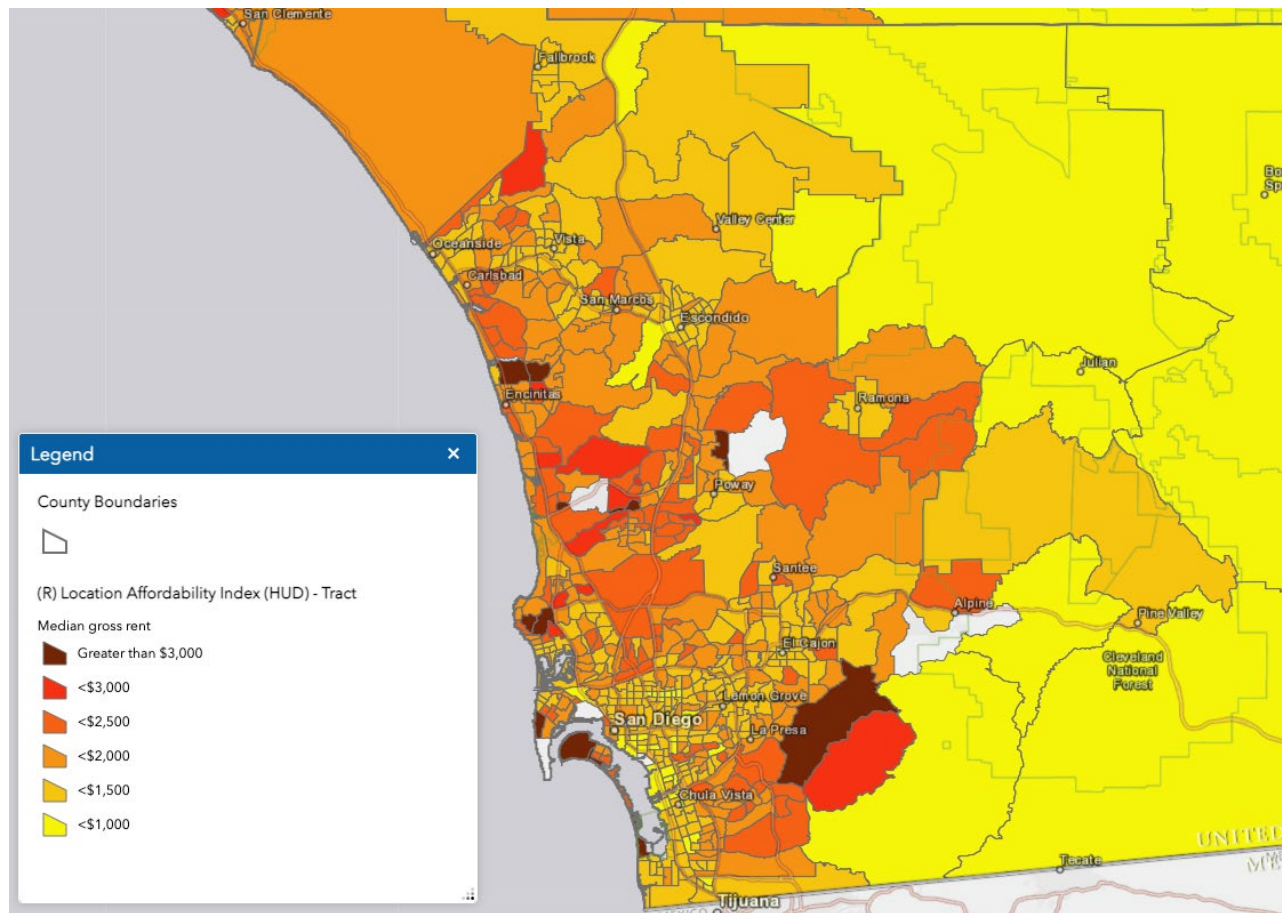


Figure A-71 below depicts percent of renter households within San Diego County in which gross rent is 30 percent of more of household income. The highest concentrations occur within the eastern, southern and far northern portions of San Diego County.

Figure A-71: Overpayment by Renters (ACS, 2015-2019) - Region

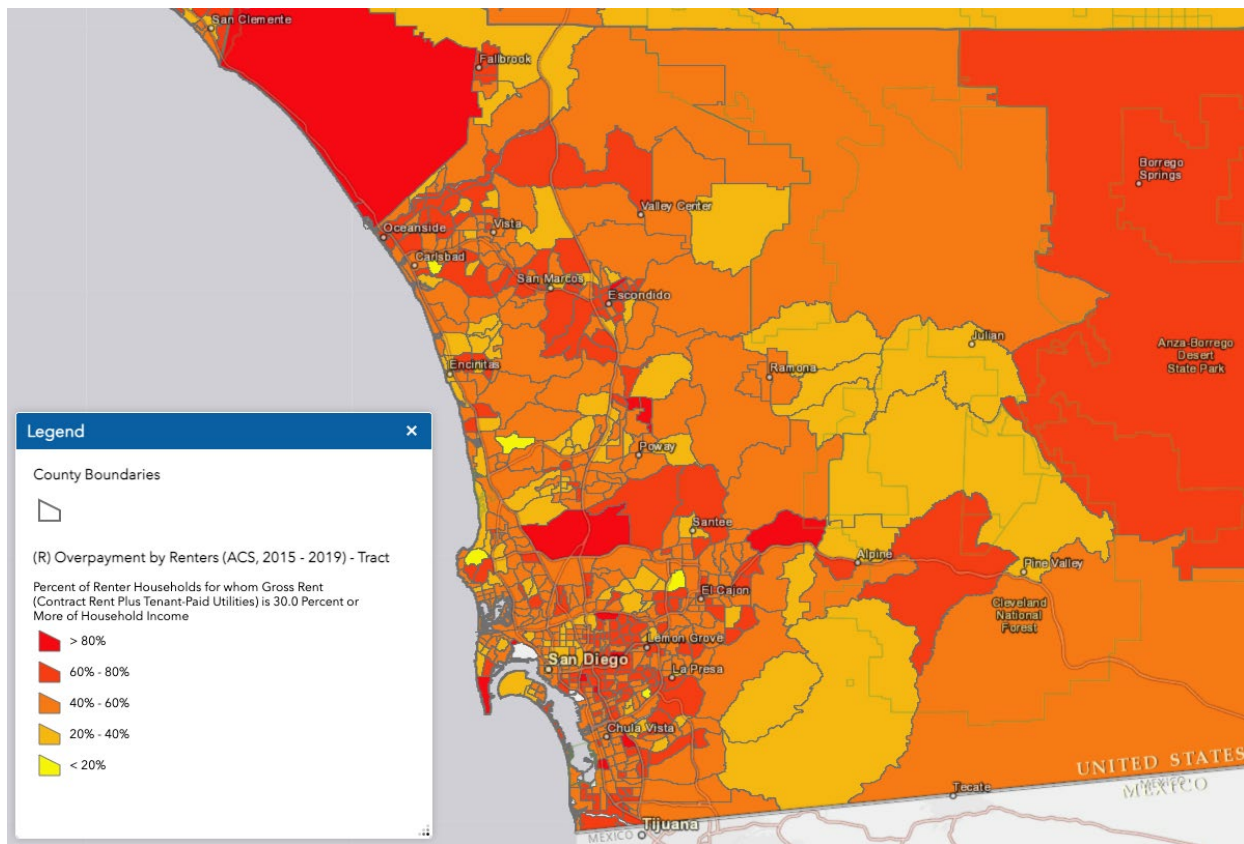


Table A-32 shows the average rental rates by jurisdiction within the County. Overpayment of rent affecting 40 percent or more of renter households is common throughout the region.

Table A-32: Average Rental Rates by Jurisdiction, 2018

Jurisdiction/Area	Unit Type	Average Monthly Rent		% Change
		Fall 2014*	Fall 2018	
Urban County				
Coronado	Studio	N/A	N/A	N/A
	1 Bedroom	\$1,325	\$1,404	6.0%
	2 Bedrooms	\$1,200	\$1,700	41.7%
	3+ Bedrooms	\$2,308	N/A	N/A
Del Mar	Studio	\$1,526	N/A	N/A
	1 Bedroom	\$1,564	\$2,338	49.5%
	2 Bedrooms	\$1,894	\$2,806	48.2%
	3+ Bedrooms	\$2,300	\$2,650	15.2%
Imperial Beach	Studio	\$925	N/A	N/A
	1 Bedroom	\$825	\$1,517	83.9%
	2 Bedrooms	\$1,635	\$1,500	-8.3%
	3+ Bedrooms	\$1,988	\$1,683	-15.3%
Lemon Grove	Studio	\$762	\$891	16.9%
	1 Bedroom	\$864	\$1,030	19.2%
	2 Bedrooms	\$1,102	\$1,282	16.3%
	3+ Bedrooms	\$1,475	N/A	N/A
Poway	Studio	\$1,012	N/A	N/A
	1 Bedroom	\$1,245	N/A	N/A
	2 Bedrooms	\$1,325	N/A	N/A
	3+ Bedrooms	\$1,842	\$2,350	27.6%
Solana Beach	Studio	\$900	N/A	N/A
	1 Bedroom	\$1,656	\$2,043	23.4%
	2 Bedrooms	\$1,967	\$2,391	21.6%
	3+ Bedrooms	\$2,310	\$2,770	19.9%
Entitlement Jurisdictions				
Carlsbad	Studio	\$911	\$1,099	20.6%
	1 Bedroom	\$1,168	\$1,457	24.7%
	2 Bedrooms	\$1,557	\$2,685	72.4%
	3+ Bedrooms	\$4,525	N/A	N/A

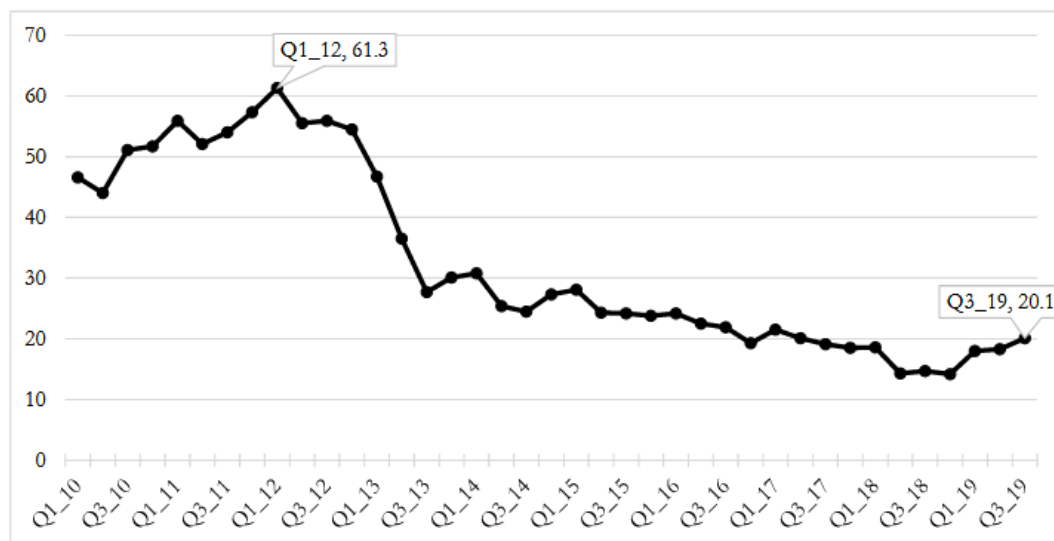
Jurisdiction/Area	Unit Type	Average Monthly Rent		% Change
		Fall 2014*	Fall 2018	
Chula Vista	Studio	\$720	\$1,210	68.1%
	1 Bedroom	\$970	\$1,539	58.7%
	2 Bedrooms	\$1,354	\$1,850	36.6%
	3+ Bedrooms	\$1,566	\$2,299	46.8%
El Cajon	Studio	\$693	\$752	8.5%
	1 Bedroom	\$1,149	\$1,742	51.6%
	2 Bedrooms	\$1,069	\$1,728	61.6%
	3+ Bedrooms	\$1,557	\$2,185	40.3%
Encinitas	Studio	\$1,362	N/A	N/A
	1 Bedroom	\$1,233	\$1,295	5.0%
	2 Bedrooms	\$1,654	\$2,145	29.7%
	3+ Bedrooms	\$1,575	\$2,150	36.5%
Escondido	Studio	N/A	N/A	N/A
	1 Bedroom	\$739	\$1,462	97.8%
	2 Bedrooms	\$1,116	\$1,728	54.8%
	3+ Bedrooms	\$1,393	\$1,784	28.1%
La Mesa	Studio	\$875	\$1,168	33.5%
	1 Bedroom	\$1,075	\$1,568	45.9%
	2 Bedrooms	\$1,467	\$1,968	34.2%
	3+ Bedrooms	\$1,875	\$2,397	27.8%
National City	Studio	\$675	N/A	N/A
	1 Bedroom	\$809	N/A	N/A
	2 Bedrooms	\$969	\$1,075	10.9%
	3+ Bedrooms	N/A	\$1,900	N/A
Oceanside	Studio	\$922	\$1,620	75.7%
	1 Bedroom	\$1,106	\$1,503	35.9%
	2 Bedrooms	\$2,217	\$1,774	-20.0%
	3+ Bedrooms	\$2,018	\$2,195	8.8%
San Diego	Studio	\$824	\$1,433	73.9%
	1 Bedroom	\$1,075	\$1,825	69.8%
	2 Bedrooms	\$1,496	\$2,172	45.2%
	3+ Bedrooms	\$1,892	\$2,637	39.4%
San Marcos	Studio	N/A	N/A	N/A
	1 Bedroom	\$1,013	\$1,021	0.8%
	2 Bedrooms	\$1,267	N/A	N/A
	3+ Bedrooms	N/A	\$1,650	N/A

Jurisdiction/Area	Unit Type	Average Monthly Rent		% Change
		Fall 2014*	Fall 2018	
Santee	Studio	\$900	N/A	N/A
	1 Bedroom	\$1,012	\$1,599	58.0%
	2 Bedrooms	\$1,568	\$1,740	11.0%
	3+ Bedrooms	\$2,763	\$1,737	-37.1%
Vista	Studio	\$674	\$1,313	94.8%
	1 Bedroom	\$1,016	\$1,636	61.0%
	2 Bedrooms	\$1,257	\$1,863	48.2%
	3+ Bedrooms	\$1,326	\$2,493	88.0%
San Diego County	Studio	\$812	\$1,085	33.6%
	1 Bedroom	\$1,066	\$1,564	46.7%
	2 Bedrooms	\$1,463	\$1,873	28.0%
	3+ Bedrooms	\$1,813	\$2,218	22.3%

Note: Fall 2014 average rents were not available for studio units in Del Mar, Imperial Beach, Poway, and Solana Beach and 3+ bedroom units in Coronado. Spring 2014 average rents are used for those values. Fall 2018 average rents not available for studios in Encinitas, Escondido, National City, San Marcos, and Santee. Fall 2018 average rent was also not available for one-bedroom units in National City.
Source: San Diego County Apartment Association. Vacancy and Rental Rate Survey, Fall 2018 and Spring 2019.

Homeownership costs are also increasing significantly and quickly. The countywide median home sales price in 2019 (\$594,909) places home ownership out of reach for all low-and moderate-income households. When homeownership is out of reach, rental housing is the only viable option for many low-income persons. Every year, the National Association of Home Builders (NAHB) tracks the ability of households to afford a home in metropolitan areas across the country. NAHB develops a Housing Opportunity Index (HOI) for a given area that is defined as the share of homes sold in that area that would have been affordable to a family earning that area's median income. The nation's 10 least affordable metro areas in 2019 were located in California. The San Diego-Carlsbad-San Marcos Metropolitan Statistical Area (MSA) is one of the least affordable areas in the nation ranking as the sixth least affordable region in the United States. In 2019 (Third Quarter), only 20 percent of the homes sold in the San Diego MSA were affordable to a family earning the area's median income. Figure A-72 shows that affordability for the region peaked in 2012 during the recession and has dropped considerably since then.

Figure A-72: Housing Opportunity Index Trend, 2010-2019



Note: Housing Opportunity Index represents the percentage of homes sold that were affordable to families earning the median income during the respective quarter.

Source: National Association of Home Builders, The NAHB/Wells Fargo Housing Opportunity Index: Complete History by Metropolitan Area (2012-Current).

Table A-33 below shows housing cost burden by income for renters and owners. Table A-33 that follows shows that about 42 percent of county households experienced cost burden including renter and owner households. A higher proportion of renter-occupied households experienced cost burden (52 percent) compared with owner-occupied households (33 percent). Carlsbad, Del Mar, Encinitas Poway, San Diego, Santee, and Carlsbad were the only jurisdictions in the region where less than 50 percent of renters were cost burdened. Approximately two-thirds (69 percent) of lower and moderate-income households experienced cost burden, and 40 percent experienced a severe cost burden.

Low-income households disproportionately experience cost burden.²⁴ Lower and moderate income households are more likely to be renters, and renters are also more likely to experience cost burden.²⁵ Seniors,²⁶ large households,²⁷ female-headed households,²⁸ and Black and Hispanic households²⁹ are more likely to be low- or moderate-income and renters. Therefore, it can be concluded that seniors, female-headed households, large households, and Black households, and Hispanic households are disproportionately experiencing cost burden. It is also likely that persons with a disability are disproportionately experiencing cost burden. Persons with a disability have a lower median income (\$26,760) than persons without a disability (\$40,834).³⁰ Persons with a disability in San Diego County are also concentrated in RECAPs, minority concentration areas, and low and moderate income areas.³¹

²⁴ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60

²⁵ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60, 70

²⁶ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 33

²⁷ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 36

²⁸ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 38

²⁹ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pg. 60

³⁰ U.S. Census, Latest ACS 5-Year Estimates, Detailed Table B18140

³¹ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, pgs. 40, 44, 63

Table A-33: Housing Cost Burden by Tenure (2012-2016 CHAS)

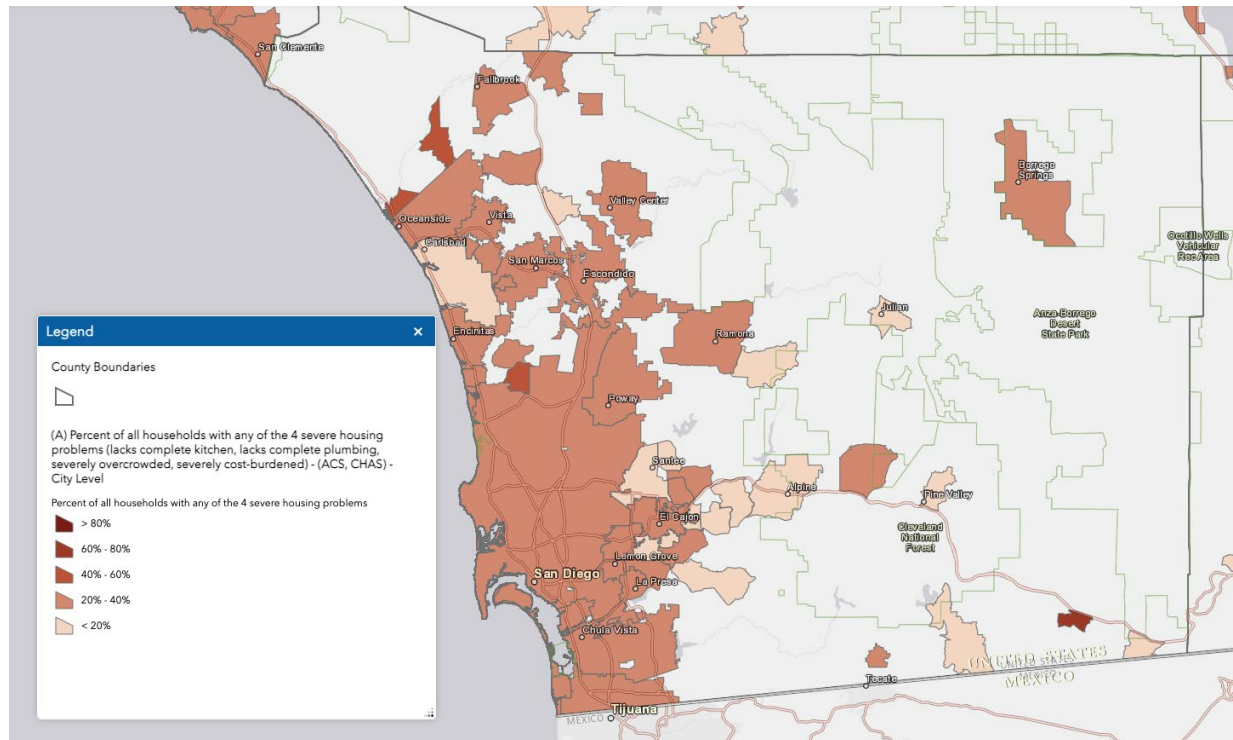
Jurisdiction	Owner-Occupied Households	Renter-Occupied Households	All Households
Urban County			
Coronado	37.5%	51.9%	44.9%
Del Mar	38.1%	42.3%	40.0%
Imperial Beach	31.4%	53.5%	46.7%
Lemon Grove	33.1%	57.0%	43.9%
Poway	29.5%	45.3%	33.7%
Solana Beach	26.6%	48.5%	35.8%
Unincorporated	35.9%	55.6%	42.3%
Total Urban County	35.0%	54.3%	41.8%
Entitlement Cities			
Carlsbad	28.6%	46.4%	35.0%
Chula Vista	36.6%	55.9%	44.7%
El Cajon	31.6%	57.7%	47.7%
Encinitas	30.9%	47.7%	36.9%
Escondido	33.5%	57.9%	46.0%
La Mesa	30.6%	51.9%	43.1%
National City	32.8%	57.4%	49.5%
Oceanside	33.4%	55.1%	42.9%
San Diego	31.8%	49.5%	41.3%
San Marcos	35.3%	53.2%	42.4%
Santee	32.1%	47.4%	36.7%
Vista	34.6%	53.2%	44.3%
San Diego County	33.1%	51.8%	42.0%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016 Estimates

Substandard Housing

Figure A-73 below depicts several housing constraints within the San Diego County region with local municipal boundaries outlined. Within most cities and unincorporated communities within the region, 20 to 40 percent of households experience these housing constraints.

Figure A-73: Percent of Households with any Overcrowding, Substandard Housing or Cost Burden (ACS, CHAS)



Homelessness

Homelessness and housing insecurity is faced by households throughout the San Diego County Region. Figure A-74 below depicts sensitive communities that are considered more vulnerable to displacement due to housing needs. Areas within the central, eastern and southern portions of the City of San Diego, and the eastern and northern portions along the SR-78 freeway corridor of San Diego County are more at risk of displacement. The City of San Diego historically has a much larger population of residents experiencing homelessness than other jurisdictions within the region. The 2019 Point-in-Time Count survey (see Section below) shows that of the total 8,102 persons experiencing homelessness in the region, 5,082 or 63 percent, are within the City of San Diego. A large number of government and community organizations that provide services specific to the homeless population are also located within the City of San Diego.

Legend

City/Town Boundaries

(A) Sensitive Communities (UCB, Urban Displacement Project)

Vulnerable

Other

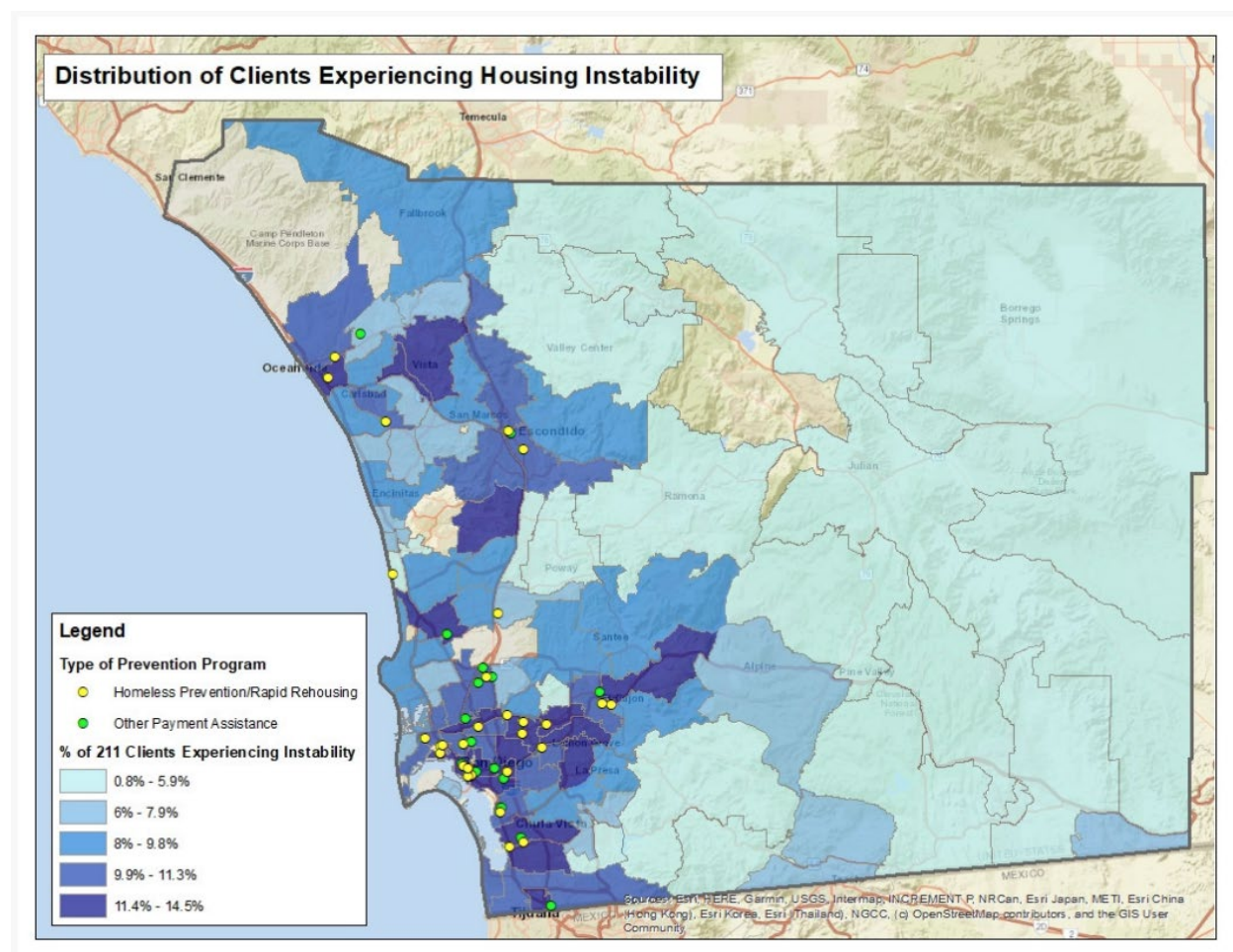
Of those, 7,818 or 48% identified as living in situations categorized as housing unstable, while the remainder were either homeless (i.e. living on the streets, in cars, or in emergency shelter) or

undetermined, meaning that 2-1-1 San Diego personnel could not determine their housing status.¹⁷ Of the sheltered population, 6% identified as living in substandard housing.¹⁸

Women comprised 72% of those calling for housing assistance, which is consistent with the general population calling 2-1-1 San Diego; about half of all callers (52%) reported being part of family with children under age 18.¹⁹ The highest percentage of callers were ages 30-39, however 20% of callers were age 60 or older.²⁰ Demographic data shows that 42% identified as Hispanic or Latino, 24% as white, and 20% as African American.²¹ Nearly a third of callers were unemployed, 17% were working full-time, and 14% were working part-time, while others reported having a disability or being retired.²²

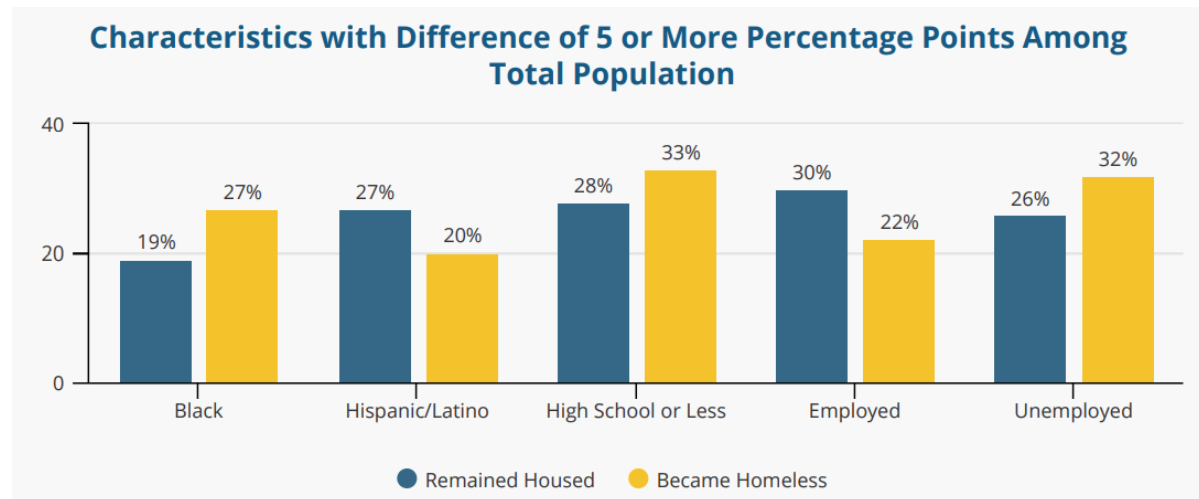
Geographically, while individuals called for housing assistance from all over San Diego County, the zip codes with the highest number of callers were City Heights, Downtown San Diego, Chula Vista, Logan Heights, El Cajon, Encanto, College Grove, and Spring Valley. It should be noted, however, that while communities in Northern San Diego County were not among the top ten zip codes with the largest number of clients experiencing housing instability, communities such as Vista, Oceanside, and Escondido had similar rates of need.²³

Figure A-75: Distribution of 2-1-1 San Diego Clients Experiencing Housing Instability



Just over a quarter of individuals initially identified as being unstably housed reported being homeless within four months. A handful of characteristics reflected a differential of five percentage points or more between individuals who entered homelessness and those who did not. These characteristics included being African American, not having an education beyond high school diploma/GED, and being unemployed.²⁴

Figure A-76: Characteristics of 2-1-1 San Diego Clients and Housing Outcomes



¹⁶ 2019 Housing Instability in San Diego County, Policy Brief Series, 2-1-1 San Diego, Community Information Exchange, LeSar Development Consultants, pg. 5

¹⁷ *ibid.*, pg. 5

¹⁸ *ibid.*, pg. 5

¹⁹ *ibid.*, pg. 6

²⁰ *ibid.*, pg. 6

²¹ *ibid.*, pg. 6

²² *ibid.*, pg. 6

²³ *ibid.*, pg. 6

²⁴ *ibid.*, pg. 8

LOCAL DATA AND KNOWLEDGE

Overview

Preparation of the City of San Diego 2021-2029 House Element and the San Diego Regional Analysis of Impediments to Fair Housing Choice provided opportunities to hear directly from various stakeholders regarding housing and fair housing choice. These stakeholders included housing professionals, service providers, affordable housing advocates, and general members of the public.

Preparation of the City's Housing Element included an online survey and in-person workshop questions. Stakeholders identified various concerns and issues related to disproportionate housing needs such as displacement risk, cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions on people with protected characteristics and households with

low incomes. While a variety of responses were received, the top responses can gauge community input and are summarized below for questions relevant to disproportionate housing need:

- The biggest barriers to affordable housing: not enough available housing; cost of housing is too high; cost of housing is too high in areas with good jobs and services.
- The most urgent housing issues: housing affordability; availability; homelessness.
- The best way to help people who are experiencing homelessness: provide housing with onsite supportive services; increase affordable housing options.
- The best way to increase housing needs for seniors: locate senior housing where services are within walking distance; offer more affordable senior housing
- The most urgent homeownership issue: overall costs; available home in my price range.
- The most pressing issue to finding quality housing: not enough well-paid jobs
- Not enough housing available; cost of housing is too high; only low-quality housing available in my price range; low availability of housing where I want to live.
- Which is the most pressing displacement concern: sudden rent increases; long-term residents can't stay in community; eviction.
- What is the best strategy to produce more housing: allow buildings with more housing units; allow more housing in single family neighborhoods; increase opportunities for backyard units; improve city processes; increase housing supply near transit; increase housing near jobs and schools.

San Diego Regional Analysis of Impediments to Fair Housing Choice Report provided the following additional findings:

- Many people have difficulty finding and accessing information about Fair Housing due to lack of access to computer/internet, knowing where to get the right information, cultural barriers, and lack of education in schools.
- Need to make sure that there are representatives at different agencies and providers that can communicate in different languages of local community.
- Challenges to building community awareness include: keeping up with updates to laws and regulations; Identifying community partners to share information with and provide training; resistance to change by homeowners; and language barriers.

Several individual stakeholder comments are excerpted below and more in-depth responses to particular housing needs follow.

- It is now time to rebuild the SROs that have been removed over the past 20 years.
- Why let the low-rent hotels kick out all of the tenants so they can remodel and become expensive housing?

- The San Diego Housing Federation proposal for a bond measure would make it possible to build the 5,400 units called for in the City of San Diego Community Action Plan on Homelessness and would build additional units for low income families at-risk of homelessness.
- What incentives could the City offer homeowners to construct accessory dwelling units on their properties that are rent-restricted to lower income households?
- I believe it's a mistake to underestimate the need for private vehicles and parking for them. Some disabled people, such as myself, are not able to walk far or use public transportation due to inability to sit or stand.
- I am a older person who has been displaced and now without permanent housing in San Diego. I would like to add a desire for the city to allow Tiny Homes on Wheels to be parked on open homeowner's lots.

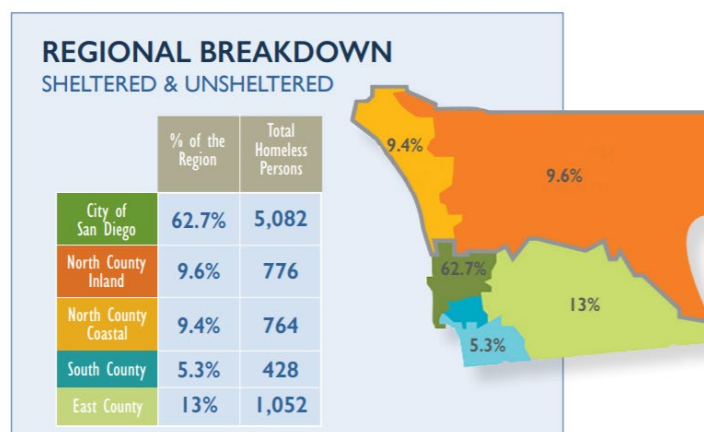
Homelessness

According to a policy brief titled *Housing Instability in San Diego County* prepared in 2019 by 2-1-1 San Diego/ Community Information Exchange and LeSar Development Consultants, the annual homeless point-in-time count figures have remained relatively consistent over the past five years, however, according to the RTFH Annual Report on Homelessness in the San Diego Region prepared for the same year, San Diego has seen an increase in the average length of time people are residing in emergency shelters. Several trends were also reported, including that the County has consistently ranked among the regions with the highest rates of homelessness nationwide, and in 2018, San Diego had the fourth largest homeless population in the nation, only behind New York City, Los Angeles, and Seattle. The highest concentration of San Diego County's homeless populations are in the urban areas of the City of San Diego.

Figure A-77: Annual Point-in-Time Count Results (2019)

2019 Point-in-Time Count Results

The following includes results from the 2019 PIT Count



Source: Annual Report on Homelessness, RTFH, 2019, p13. https://www.rtfhsd.org/wp-content/uploads/AnnuallylayoutRevised3_26_20.pdf

Like areas across the nation, San Diego has similar challenges when it comes to poverty, housing affordability, and homelessness. The results of the annual counts indicate that thousands of individuals are becoming homeless for the first time each year. Based on the review of data from the Regional Task Force on the Homeless, the following was observed: 68% of persons who entered a shelter or temporary housing program in the region in 2017 were identified as being homeless for the first time, and just over half of people living unsheltered in 2018 report that their primary reason for being homeless was the loss of job, financial issues, or the cost of housing. Also concerning for the region is that under a broader definition of homelessness, nearly 24,000 San Diego County students in grades K-12 are considered homeless because they live in households that are doubled up with family or friends. (<http://ciesandiego.org/wp-content/uploads/2019/09/Housing-Instability-in-San-Diego-Policy-Brief-090819.pdf>)

Homeless and challenges for unsheltered populations were a topic brought up during the stakeholder interviews conducted for the AI and the workshops, both of which included agencies working directly with those populations. The feedback on fair housing misconceptions included a lack of understanding about different individuals or people who are homeless, suffering from mental illness, live in permanent supportive housing. In addition, homeless individuals and families are among those in protected classes with shared experiences of housing discrimination. Listed as one of the major challenges in meeting fair housing needs in the AI is that many homeless individuals lack the right documentation to apply to programs.

Formerly homeless persons often have a very difficult time finding housing once they have moved from transitional housing or other assistance programs. Housing affordability for those who were formerly homeless is challenging from an economics standpoint, but this demographic group may also encounter fair housing issues when property owners/managers refuse to rent to formerly homeless persons. The perception may be that they are more economically (and sometimes mentally) unstable. Homeless persons may also experience discrimination in homeless shelters. This can occur in the form of discrimination based on protected classes, rules or policies with a disparate impact on a protected class, or lack of reasonable accommodation. (AI, page 50)

CONCLUSIONS, SUMMARY OF ISSUES, AND CONTRIBUTING FACTORS

Based on research, as discussed in this section, factors contributing to disproportionate housing needs, including dislocation, are:

Low Household Income

Overall, lower-income households represented over 28 percent of all households in San Diego County in 2012-2016. However, certain groups had higher proportions of lower-income households. Specifically, Hispanic (40.9 percent) and Black (36.8 percent) households had a considerably higher proportion of lower-income households than the rest of the county. As discussed in the previous section, lower income households were disproportionately likely to experience the housing problems of incomplete kitchen and bathroom facilities, cost burden, and overcrowding.

Lack of Access to Opportunity

Lack of access to opportunity (quality schools, educational attainment, employment opportunities, and transportation options) contributes to low household income, housing problems, and displacement risk. Educational attainment is a main predictor of household income. AI Chapter 3, Section N: Exposure to Adverse Community Factors (pgs. 102-119) maps the County's distribution of Title 1 and non-Title 1 public schools compared to minority concentration areas and low and moderate income areas. It also assesses Low Poverty Index, School Proficiency Index, Labor Market Engagement Index, Jobs Proximity Index, Transit Trips Index, Low Transportation Cost Index, and Environmental Health Index. In the City of San Diego, Black and Hispanic residents have the lowest access to low poverty areas, proficient schools, labor market engagement, jobs, and healthy environments. This is reflected in the low rates of adults with a college degree and high rates of adults with less than a high school diploma in Displacement Risk Areas (see following section).

Disconnection Between Jobs and Housing

Similar to lack of access and opportunity, there is a disconnect between jobs and housing affordable to the low and moderate income workforce within the city and the region. The coastal and northern areas of the city and county tend to be the region's primary job centers. Jobs in these areas also have a wide range of wage levels and employment sectors including hospitality, professional services, military, life sciences, and light manufacturing. These areas also have some of the highest housing costs and are mainly affordable to higher income households. While bus and trolley transit service connections are available within these employment areas, transit is not always the most convenient travel option often due to lack of service frequency on many routes, limited night and evening service, as well as lack of first and last mile transit connections. Lower income, non-white and disabled populations are disproportionately affected. Travel length is further from the eastern and southern portions of the city and region comparatively adding time and cost for each commute independent of travel mode. When a single-occupant motor vehicle is the travel mode of choice, persons who lack ready access to an automobile due to cost or driving ability are disproportionately affected.

Increasing Rents

Increasing rents exacerbate housing cost burden, decrease housing options and increase likelihood of households having to accept insufficiently sized and substandard housing. Rising rents also result in household moves due to rent increases and increased evictions. While Figure HE-A-6 shows that rents in Displacement Risk Areas are generally in the second and third fifths of the distribution, Figure HE-A-7 shows high rates of rent-burdened households. Further, Figure HE-A-8 shows high rates of renter households in Displacement Risk Areas. Rent increases also disproportionately affect non-White residents. Ethnic minority populations in San Diego County experience lower rates of homeownership than the White population. As of 2017, of those who owned the housing units they occupied, 64 percent were White; 18 percent were Hispanic; three percent were Black; and 11 percent were Asian/Pacific Islanders. Minorities in the county are underrepresented in terms of homeownership. Per the 2013-2017 ACS data, Whites are 46 percent of the county population, Hispanics are 33 percent, while 12 percent are Asian/Pacific Islander and five percent of the population was Black.

Inadequate Housing Supply

Inadequate supply of housing, regardless of affordability, contributes to increasing rents and inadequate supply of affordable housing decreases housing options for a range of household incomes. As discussed in the Housing Element, average monthly rents have risen by 42% since 2012. In the current situation, where housing supply is low and costs continue to increase, the potential for displacement of low income households increases as rents and property values rise and, access to opportunity decreases as income and wealth barriers to housing in communities with opportunity and job proximity grow.

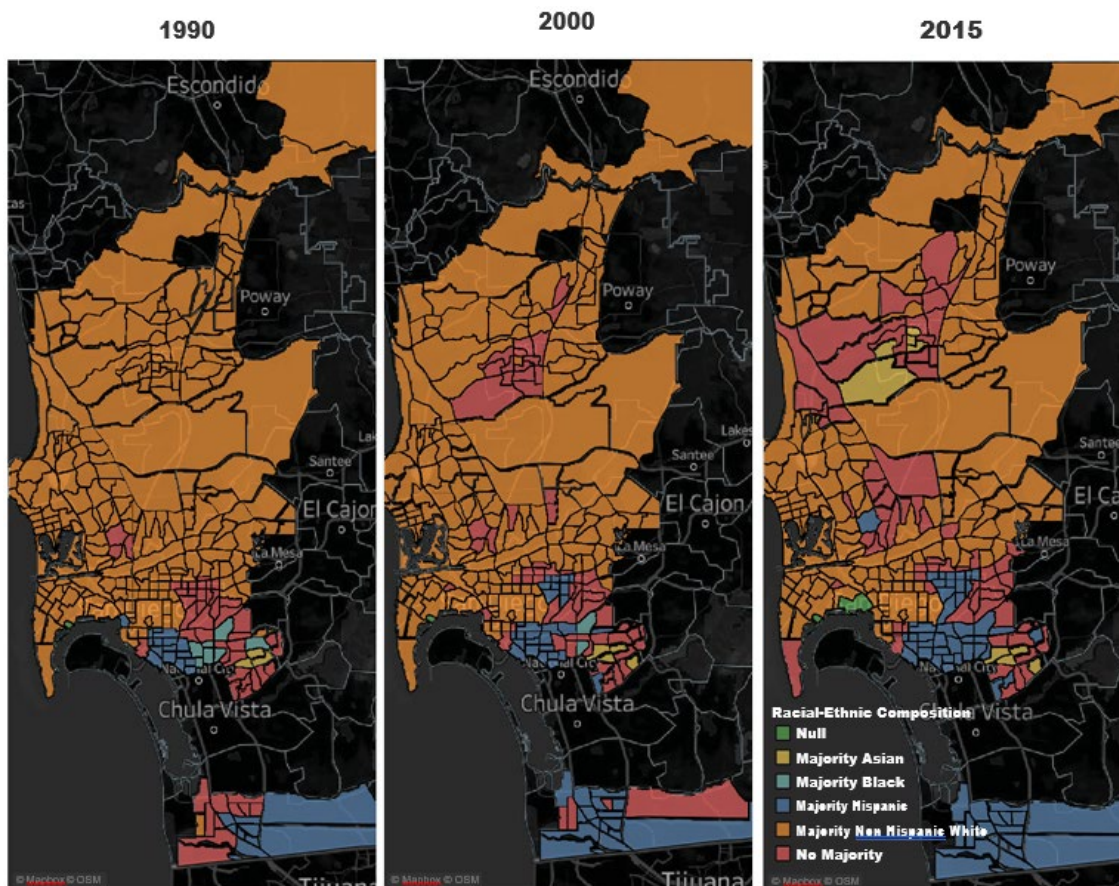
DISPLACEMENT RISK

LOCAL PATTERNS AND TRENDS

Racial-Ethnic Composition 1990-2015 - City of San Diego

As illustrated in maps below showing residential patterns in race and ethnicity, much of the geographical area of the City of San Diego was majority white in 1990, with majority Black, Hispanic, and Asian areas confined to southern portions of the City - reflecting a history of redlining, restrictive covenants, disparate treatment, and suburban expansion inhabited by predominantly Non-Hispanic White households. Since 1990, the maps highlight segregation and integration trends that include: Increasing integration in some of the northern suburbs, with some northern suburban census tracts becoming Majority Asian; expansion of central and southern census tracts that are Majority Hispanic; and reduction in the number of central census tracts that are Majority Black. During the same timeframe, the City's Hispanic population increased from 20.1 percent to 30.5 percent; its Asian population increased from 11.8 percent to 16 percent; and its Black population decreased from 9.4 percent to 6 percent.¹

Figure A-78: Change in Racial/Ethnic Residential Composition 1990-2015



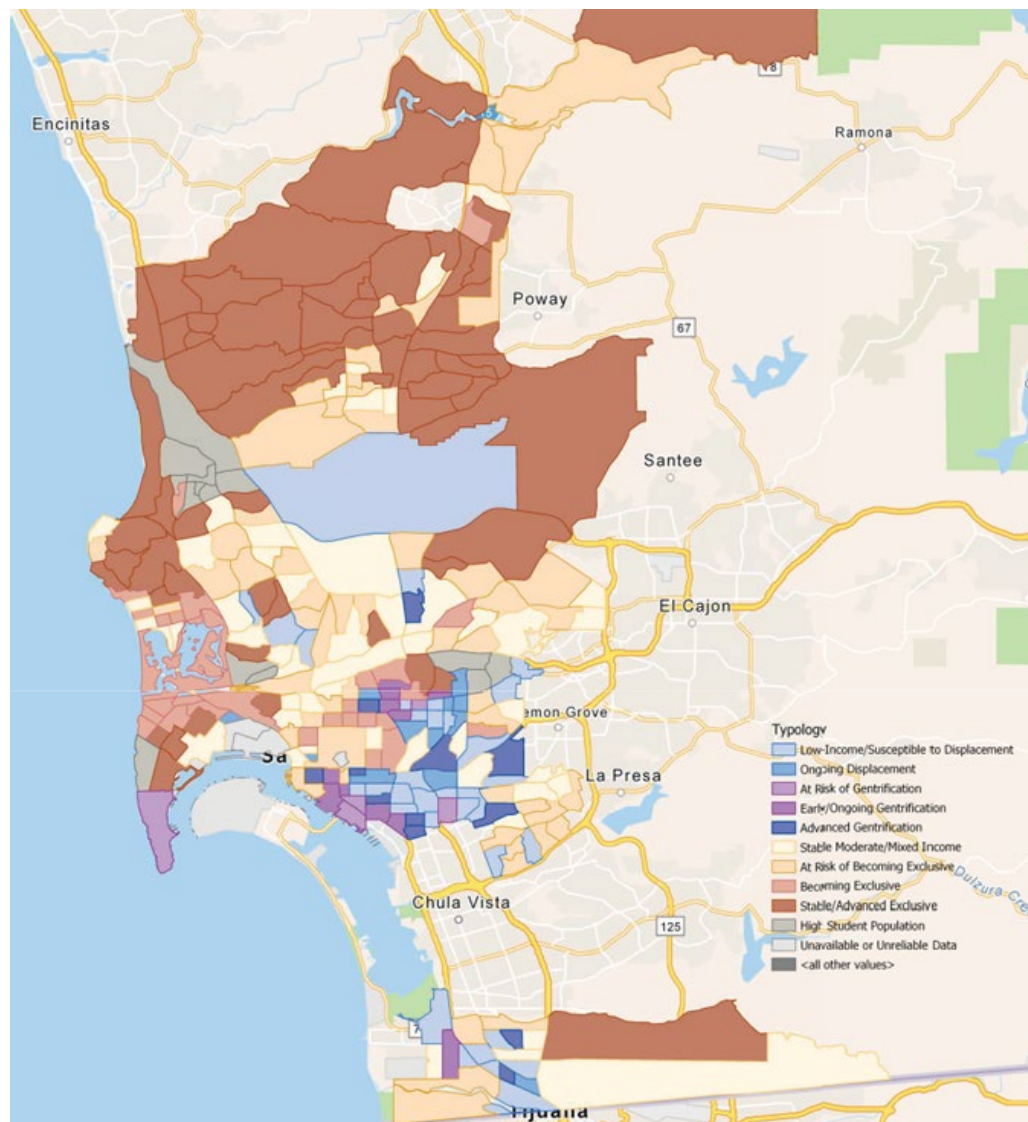
¹ U.S. Census and ACS Population Data, 1990 and 2015

Displacement Risk and Risk Factors

In 2016, the UCLA Urban Displacement Project team developed a neighborhood change database to help stakeholders better understand where neighborhood transformations are occurring and to identify areas that are vulnerable to gentrification and displacement in Southern California. The study helps analyze if gentrification has occurred in a census tract and to what extent. It also identifies areas that exhibit characteristics that make them susceptible to displacement. To assess risk for resident displacement during the 6th Housing Element cycle, the Urban Displacement Project neighborhood change database is utilized. The database assigns census tracts one of 11 neighborhood change typologies based on resident ethnicity, access to education and jobs, median rent, median increase in income, and other factors. Tracts in four categories are considered displacement risk areas:

- Low Income/Susceptible to Displacement
- Ongoing Displacement
- At Risk of Gentrification
- Early/Ongoing Gentrification

Figure A-79: UCLA Urban Displacement Project Neighborhood Change Typologies – City of San Diego

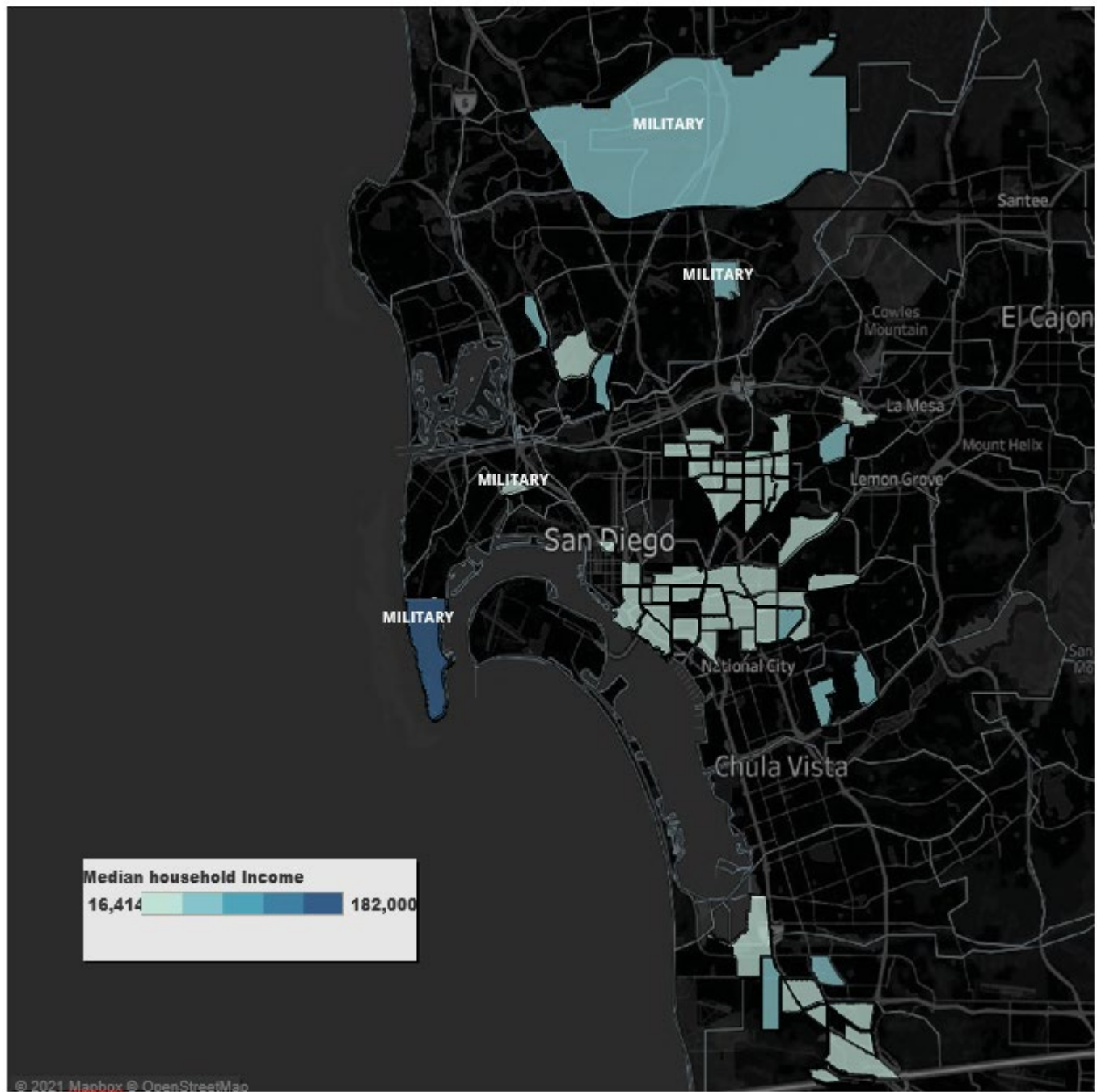


Based on research, as discussed in this section, factors contributing to displacement risk are low household income, lack of access to opportunity, increasing rents, and inadequate housing supply. Each factor is discussed in more detail below.

Low Household Income

Displacement Risk Areas, as shown in Figure A-80, experience household incomes in the bottom two-fifths of the income distribution range. Overall, lower-income households represented over 28 percent of all households in San Diego County in 2012-2016. However, certain groups had higher proportions of lower-income households. Specifically, Hispanic (40.9 percent) and Black (36.8 percent) households had a considerably higher proportion of lower-income households than the rest of the county.

Figure A-80: Median Household Income in Dollars in Displacement Risk Areas – City of San Diego

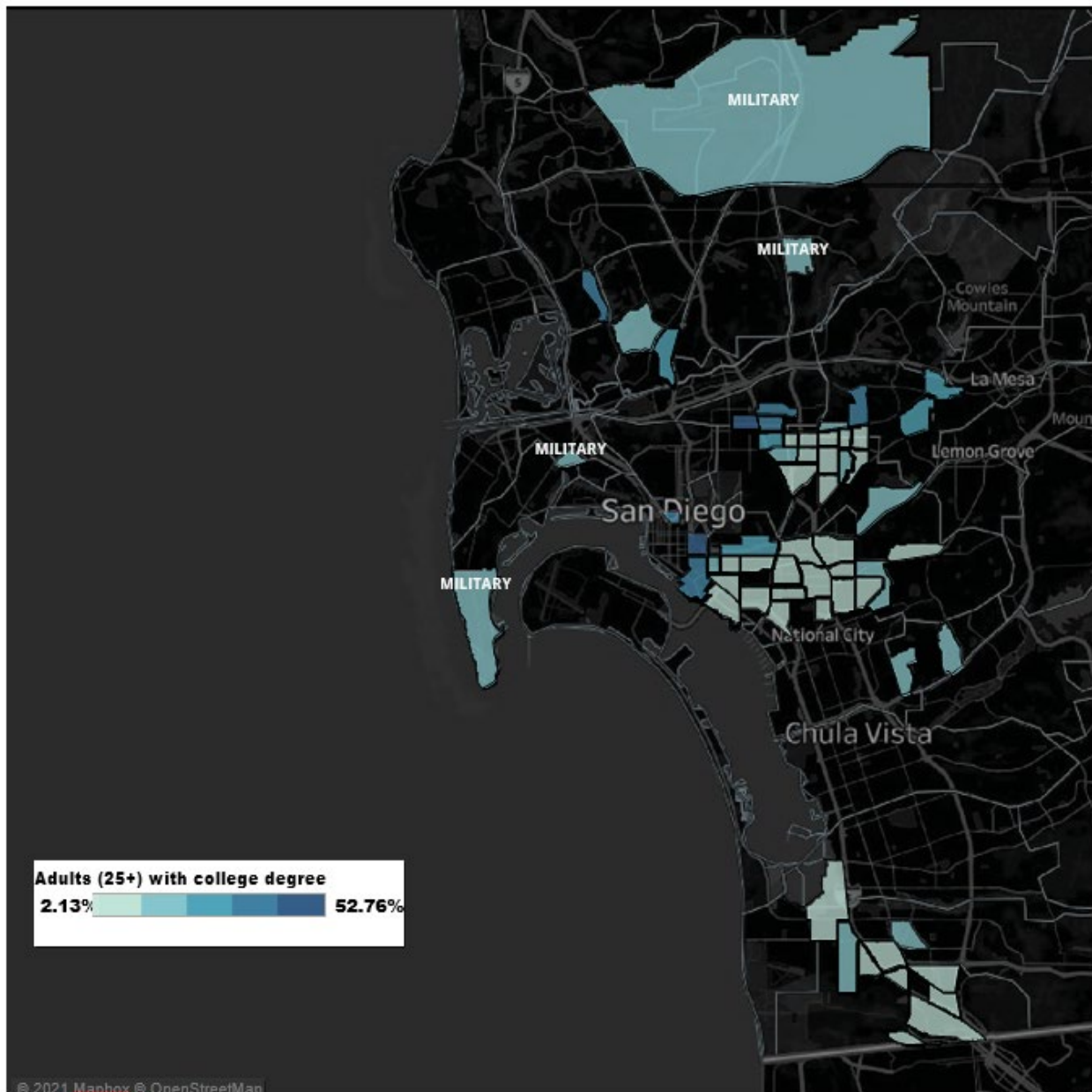


Lack of Access to Opportunity

Lack of access to opportunity (quality schools, educational achievement, employment opportunities, and transportation options) contributes to low household income, housing problems, and displacement risk. AI Chapter 3, Section N: Exposure to Adverse Community Factors maps the County's distribution of Title 1 and non-Title 1 public schools compared to

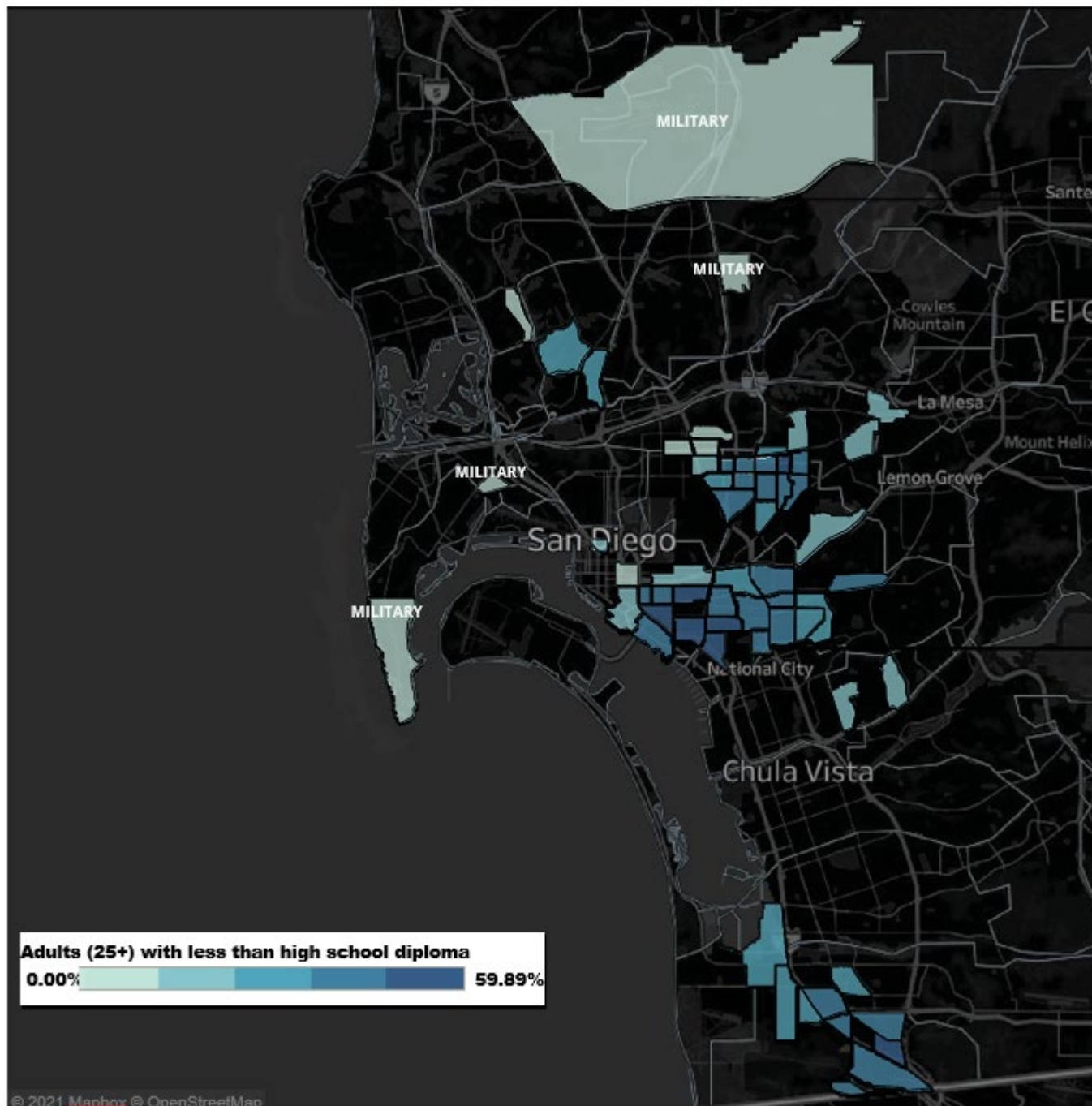
minority concentration areas and low and moderate income areas.² It also assesses Low Poverty Index, School Proficiency Index, Labor Market Engagement Index, Jobs Proximity Index, Transit Trips Index, Low Transportation Cost Index, and Environmental Health Index. In the City of San Diego, Black and Hispanic residents have the lowest access to low poverty areas, proficient schools, labor market engagement, jobs, and healthy environments. This is reflected in the low rates of adults with a college degree and high rates of adults with less than a high school diploma in Displacement Risk Areas, as shown in Figures A-81 and A-82.

Figure A-81: Percent of Adults with a College Degree in Displacement Risk Areas



² 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, p102-119.

Figure A-82: Percent of Less Than a High School Diploma in Displacement Risk Areas – City of San Diego



Increasing Rents

Increasing rents exacerbate housing cost burden, decrease housing options and increase likelihood of households having to accept insufficiently sized and substandard housing. Rising rents also result in household moves due to rent increases and increased evictions. While Figure A-83 shows that rents in Displacement Risk Areas are generally in the second and third fifths of

the distribution, Figure A-84 shows high rates of rent-burdened households. Further, Figure A-85 shows high rates of rentership in Displacement Risk Areas. Rent increases also disproportionately affect non-White residents. Ethnic minority populations in San Diego County experience lower rates of homeownership than the White population. As of 2017, of those who owned the housing units they occupied, 64 percent were White; 18 percent were Hispanic; three percent were Black; and 11 percent were Asian/Pacific Islanders. Minorities in the county are underrepresented in terms of homeownership. Per the 2013-2017 ACS data, Whites are 46 percent of the county population, Hispanics are 33 percent, while 12 percent are Asian/Pacific Islander and five percent of the population was Black.

Figure A-83: Median Gross Rent in Dollars in Displacement Risk Areas – City of San Diego

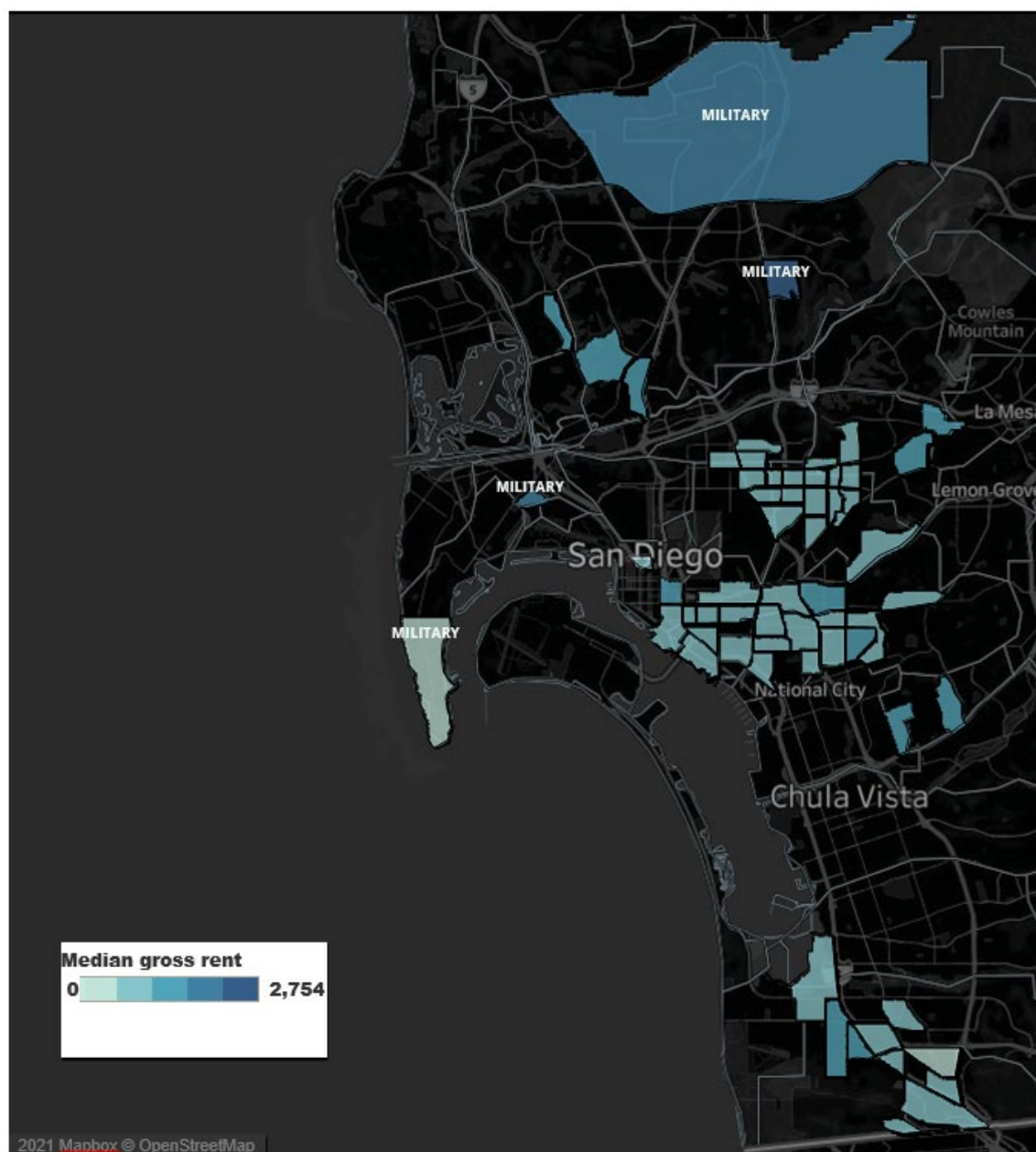


Figure A-84: Percent Rent-Burdened Households in Displacement Risk Areas – City of San Diego

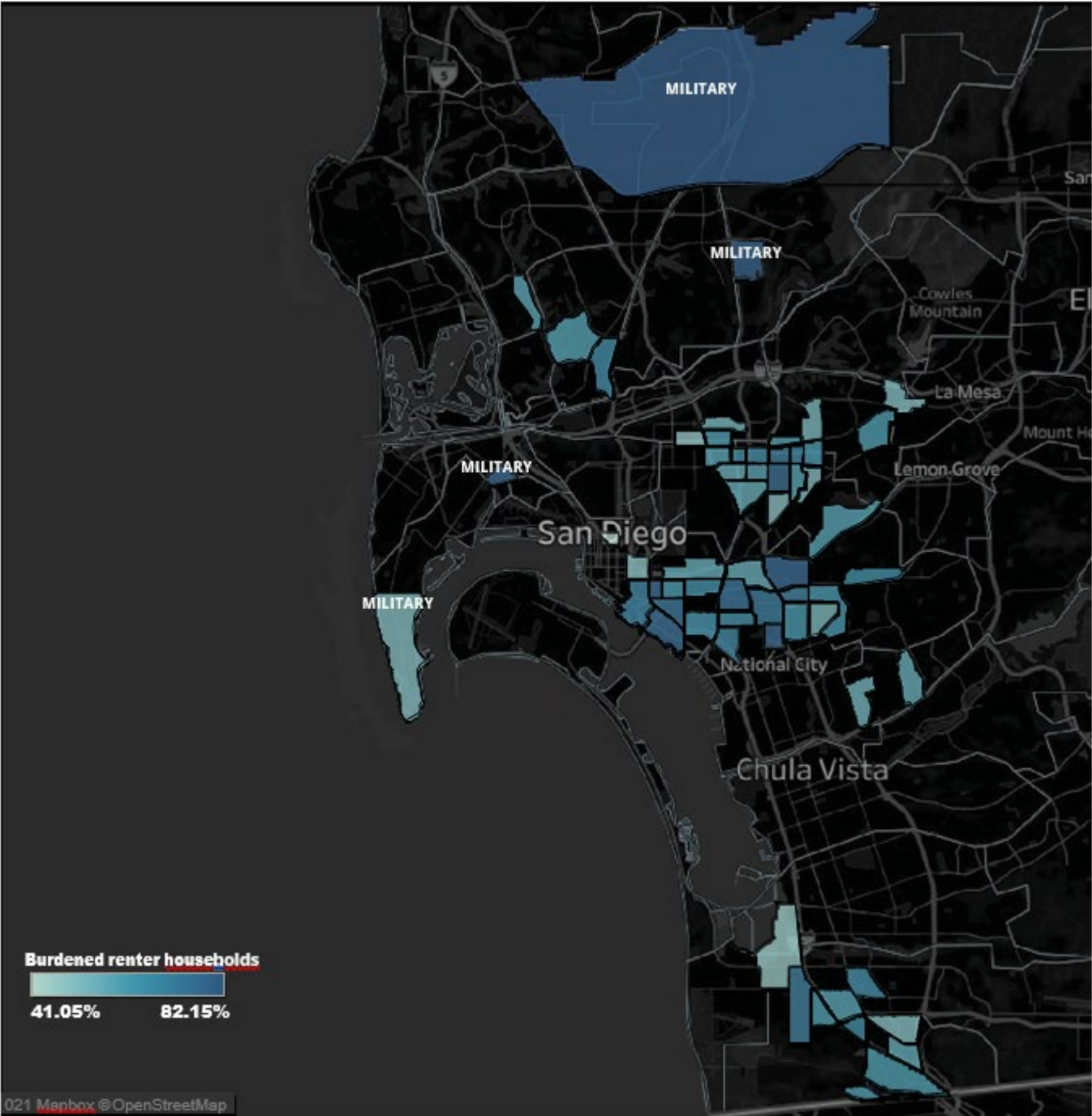
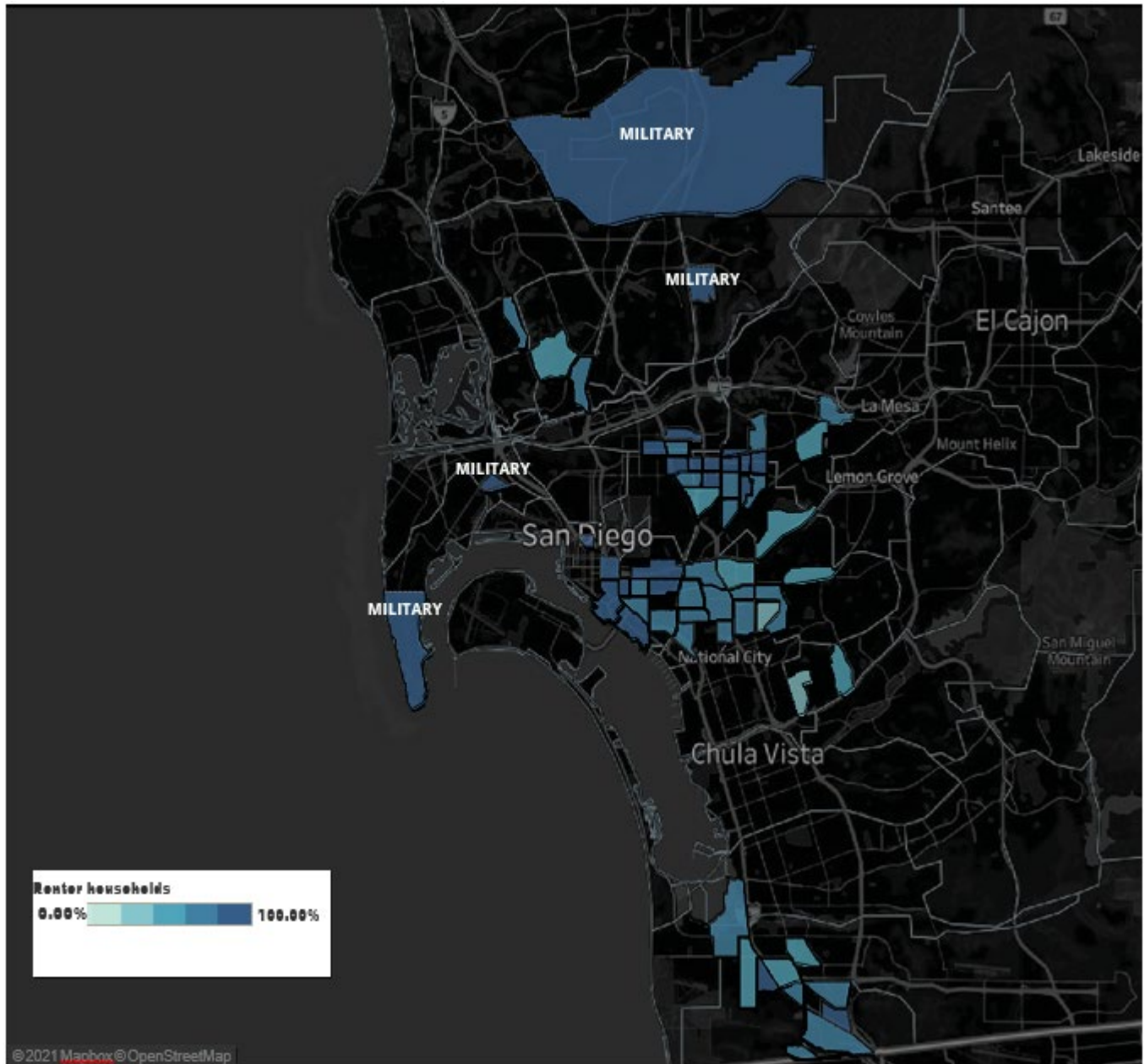


Figure A-85: Percent Renter Households in Displacement Risk Areas- City of San Diego



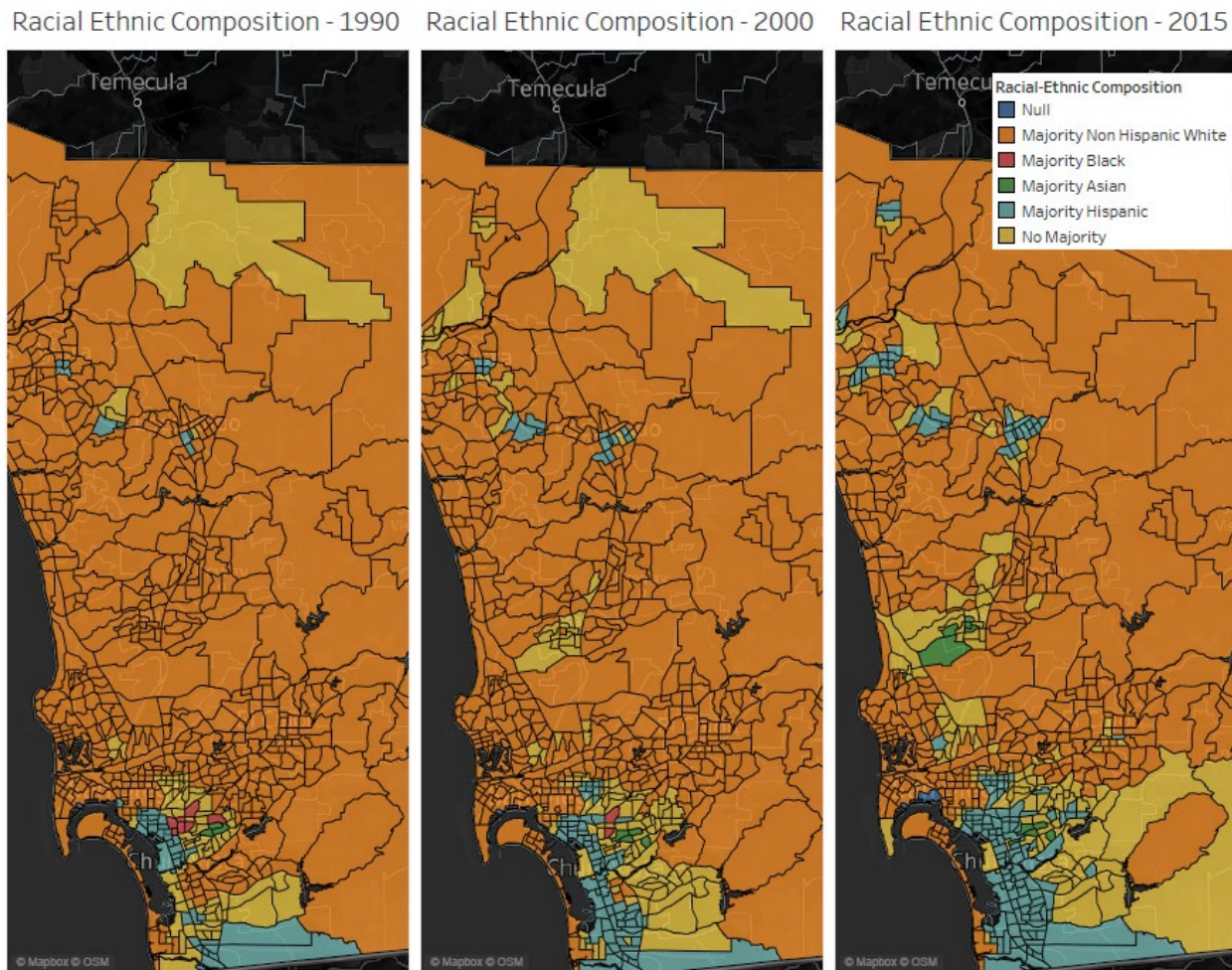
Inadequate Housing Supply

Inadequate supply of housing, regardless of affordability, contributes to increasing rents and inadequate supply of affordable housing decreases housing options for a range of household incomes. As discussed in the Housing Element, average monthly rents have risen by 42 percent since 2012. In the current situation, where housing supply is low and costs continue to increase, the potential for displacement of low income households increases as rents and property value rise and, and access to opportunity decreases as income and wealth barriers to housing in communities with opportunity and job proximity grow.

Regional Patterns and Trends

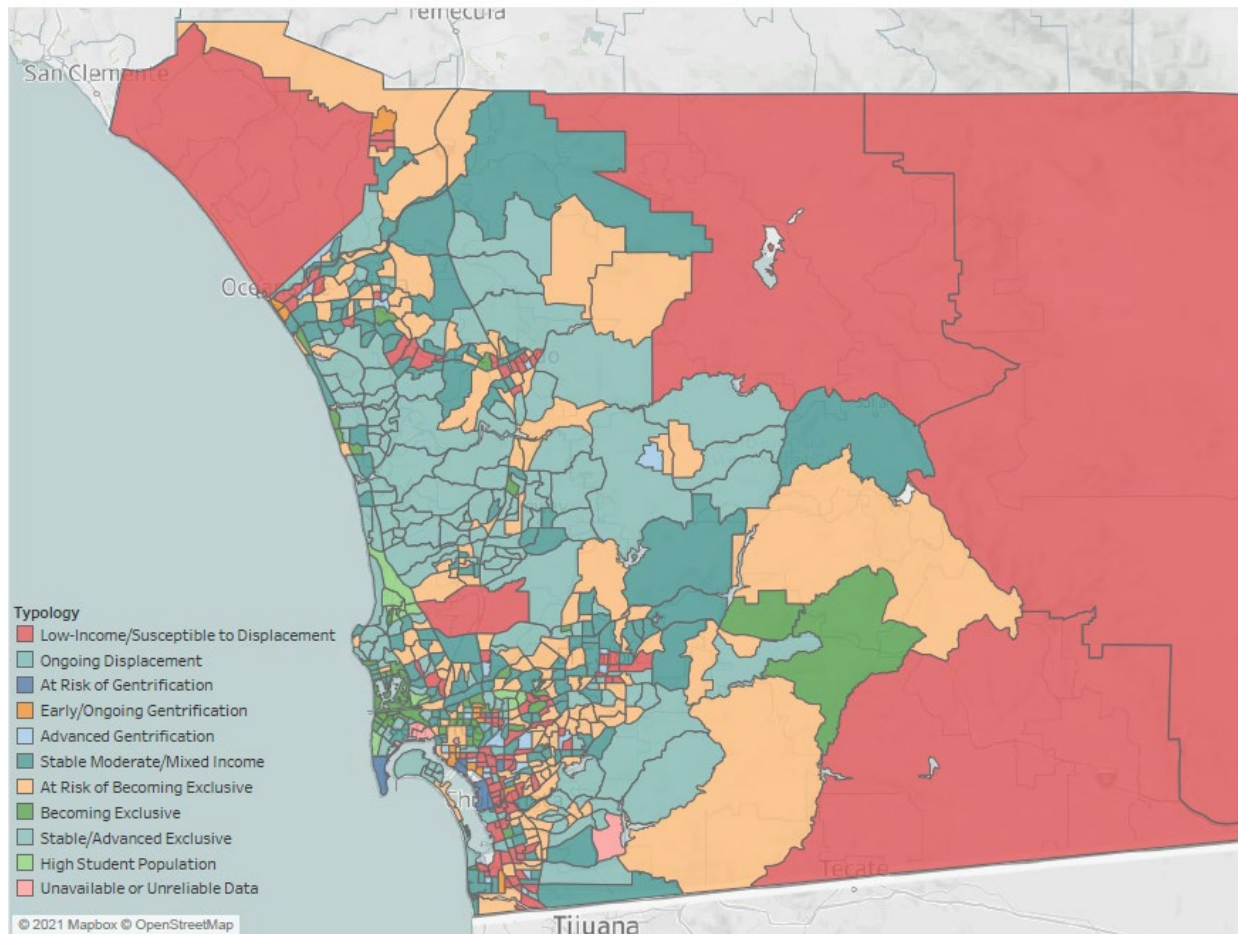
Racial-Ethnic Composition 1990-2015 - San Diego County

Figure A-86: Racial-Ethnic Composition 1990-2015 - San Diego County Region



The maps in Figure A-86 illustrate the change in race and ethnicity in the San Diego region. In 1990, much of the region was majority white except for the areas in the City of San Diego reflecting a history of redlining, restrictive covenants, disparate treatment, and suburban expansion inhabited by Non-Hispanic White households. In the southern areas of the City of San Diego there are areas of with majority Hispanic, Asian, and Black. Along with areas that do not have a Majority indicating a mix of races and ethnicities. By the year 2000, the northern region of San Diego is changing from majority Non-Hispanic white to Majority Hispanic or No Majority. The central region shows changes from a Majority Non-Hispanic White racial and ethnic composition to No Majority. Within the City of San Diego, there are changes from No Majority to Majority Hispanic, the Majority Asian increased in a small area, and the Majority Black, decreased to Majority Hispanic and No Majority. In the southern region, of National City and Chula Vista, changes include more Hispanic majorities, and the Majority Non-Hispanic White is changing to No Majority. In 2015, the maps show a much larger concentration of Majority Hispanic, and No Majority indicating these areas are in transition. The Majority Asian population has increased in the central region, and Majority Black areas in the City of San Diego have disappeared. The southern region has converted to a Majority Hispanic or No Majority.

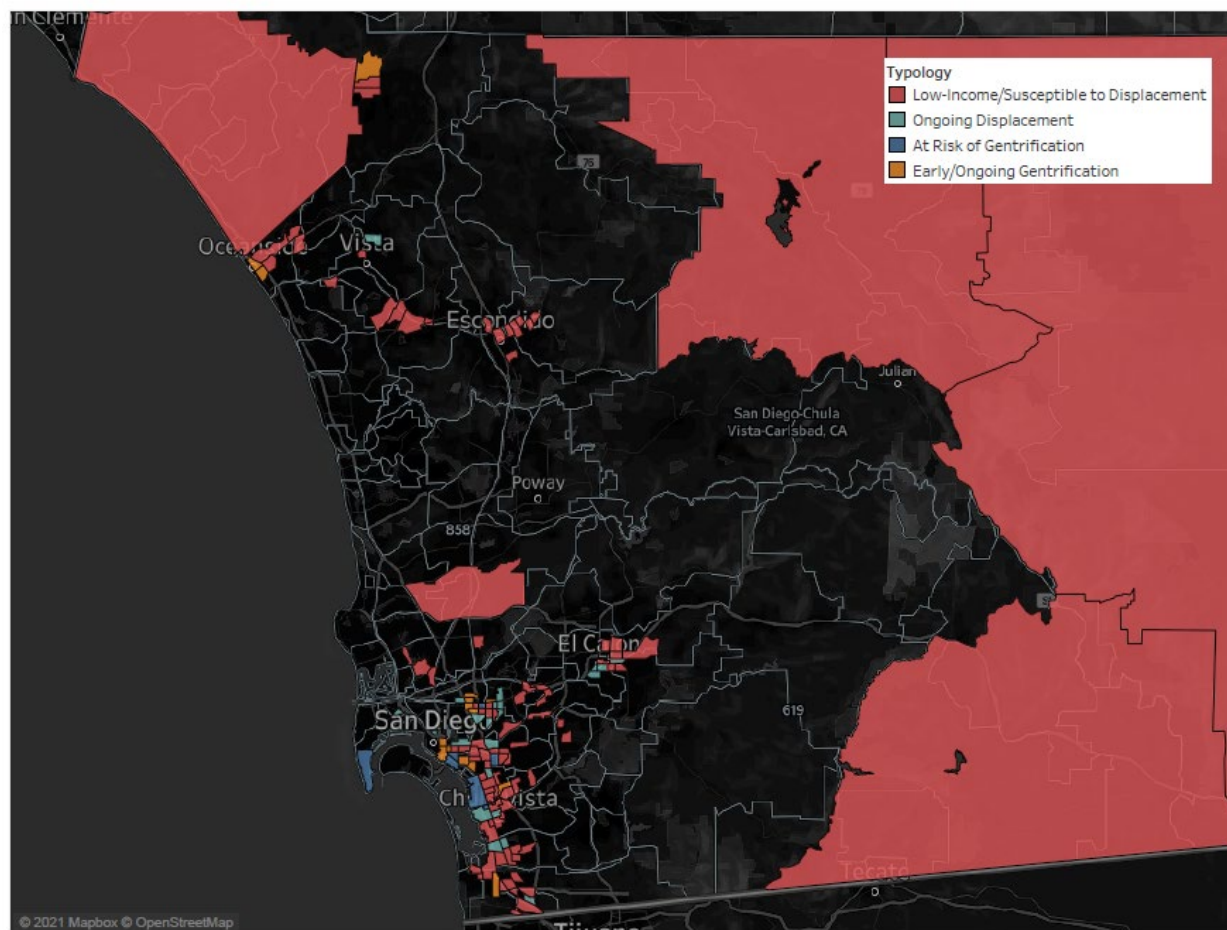
Figure A-87: UCLA Urban Displacement Project Neighborhood Change Typologies – San Diego County Region



Displacement Risk and Risk Factors

The UCLA Urban Displacement Project identifies the following four typologies as displacement risks; Low Income/Susceptible to Displacement, Ongoing Displacement, At Risk of Gentrification, and Early/Ongoing Gentrification. According to the map of the San Diego region, a large majority of the region falls into one of the typologies and is therefore at displacement risk. Low income/Susceptible to Displacement areas include Marine Corps Camp Pendleton and Marine Corps Air Station Miramar (MCAS Miramar) as well as the largely uninhabited desert areas to the east. Also falling in this category are areas in the north, areas within the City of San Diego and stretching into the southern region of the county along the waterfront. Ongoing Displacement is prominent on the map and can be found throughout the region but is most prominent in the central region of the county. As Risk of Gentrification are smaller areas along San Diego Bay in National City and Chula Vista as well as Naval Base Point Loma. Early/Ongoing Gentrification areas are located in the San Diego communities of Gaslamp Quarter Barrio Logan, and Normal Heights and the cities of National City, Chula Vista and Imperial Beach.

Figure A-88: Displacement Risk Areas – San Diego County Region



This map displays only areas with the following displacement risks: Low Income/Susceptible to Displacement, Ongoing Displacement, At Risk of Gentrification, and Early/Ongoing Gentrification. The same data is displayed as the previous map, though the information is specifically focused on the displacement risks.

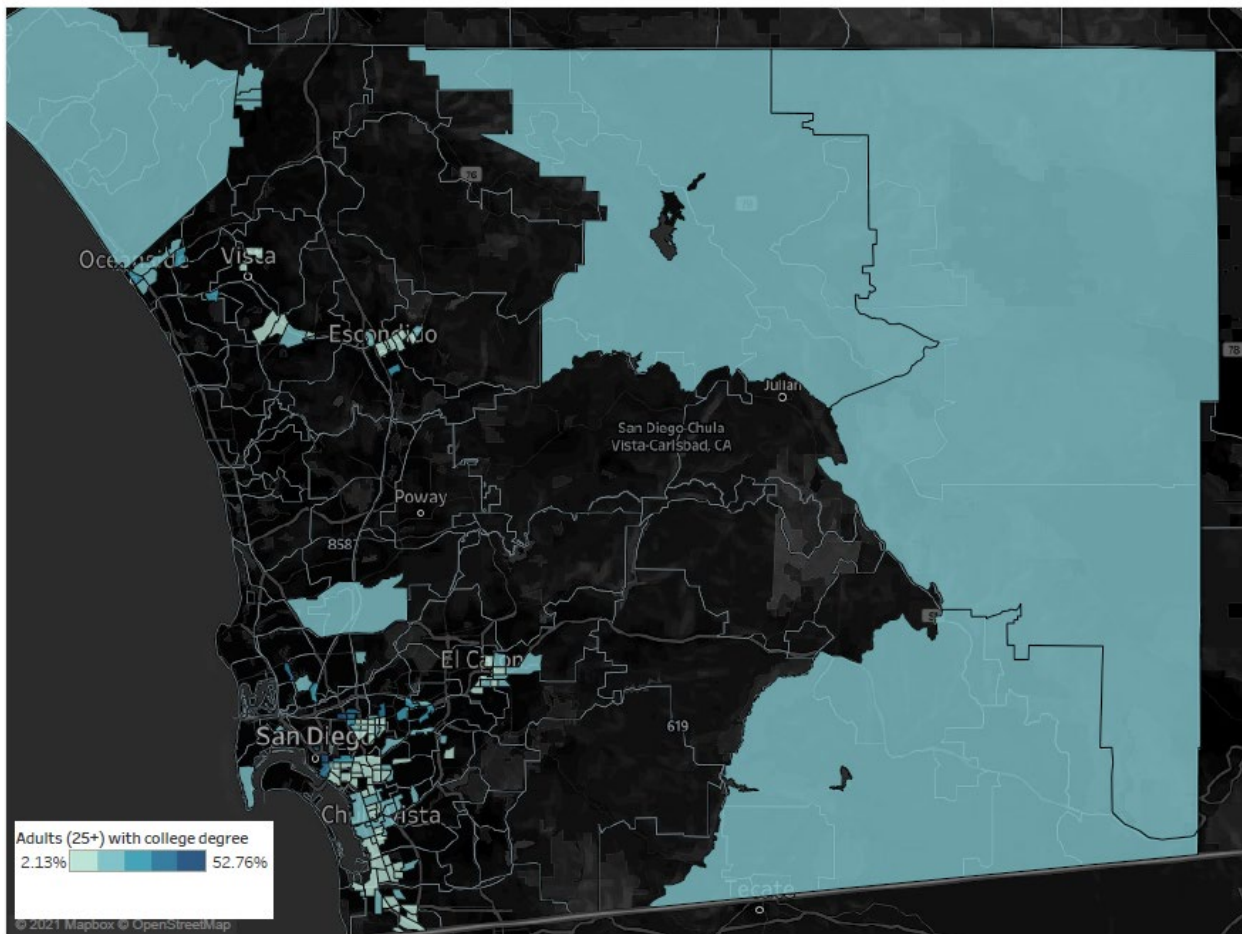
Median household Income

16,414 181,155

© 2021 Mapbox © OpenStreetMap

Lower household incomes are disproportionately likely to experience cost burden and overcrowding. The median household income is low as displayed in this map. A few areas in northern San Diego county show very low median incomes as well as many areas in Southeastern San Diego, El Cajon, and into National City, Chula Vista, and San Ysidro. In the Displacement Risk Areas, the median household income is very low. In most cases the median household income is less than \$20,000. A low median household income places residents of these areas at a high risk for displacement. With a low median household income, tenants in these areas will not be able to absorb rent increases. When rent increases, displacement will likely take place.

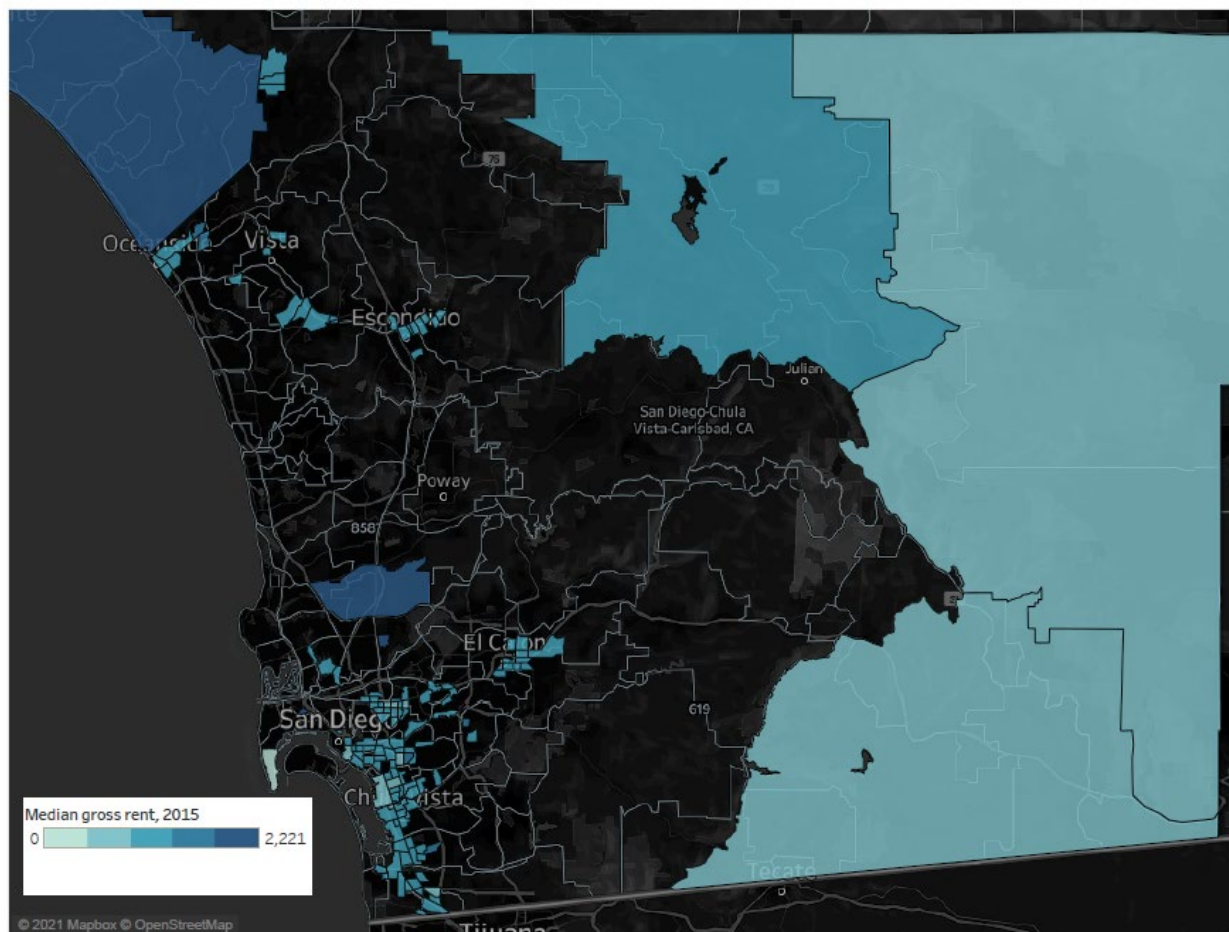
Figure A-90: Percent of Adults with a College Degree in Displacement Risk Areas



Lack of Access to Opportunity

Within the Displacement Risk Area, the percent of adults with a college degree is very low, in most cases closer to 2 percent and in the majority of cases the percent of adults with a college degree is about 25 percent. Adults with a college degree have a greater chance of finding and obtaining higher paying jobs. Without a college degree, wages can remain low, making residents vulnerable to displacement.

Figure A-91: Median Gross Rent in Dollars in Displacement Risk Areas – San Diego County Region



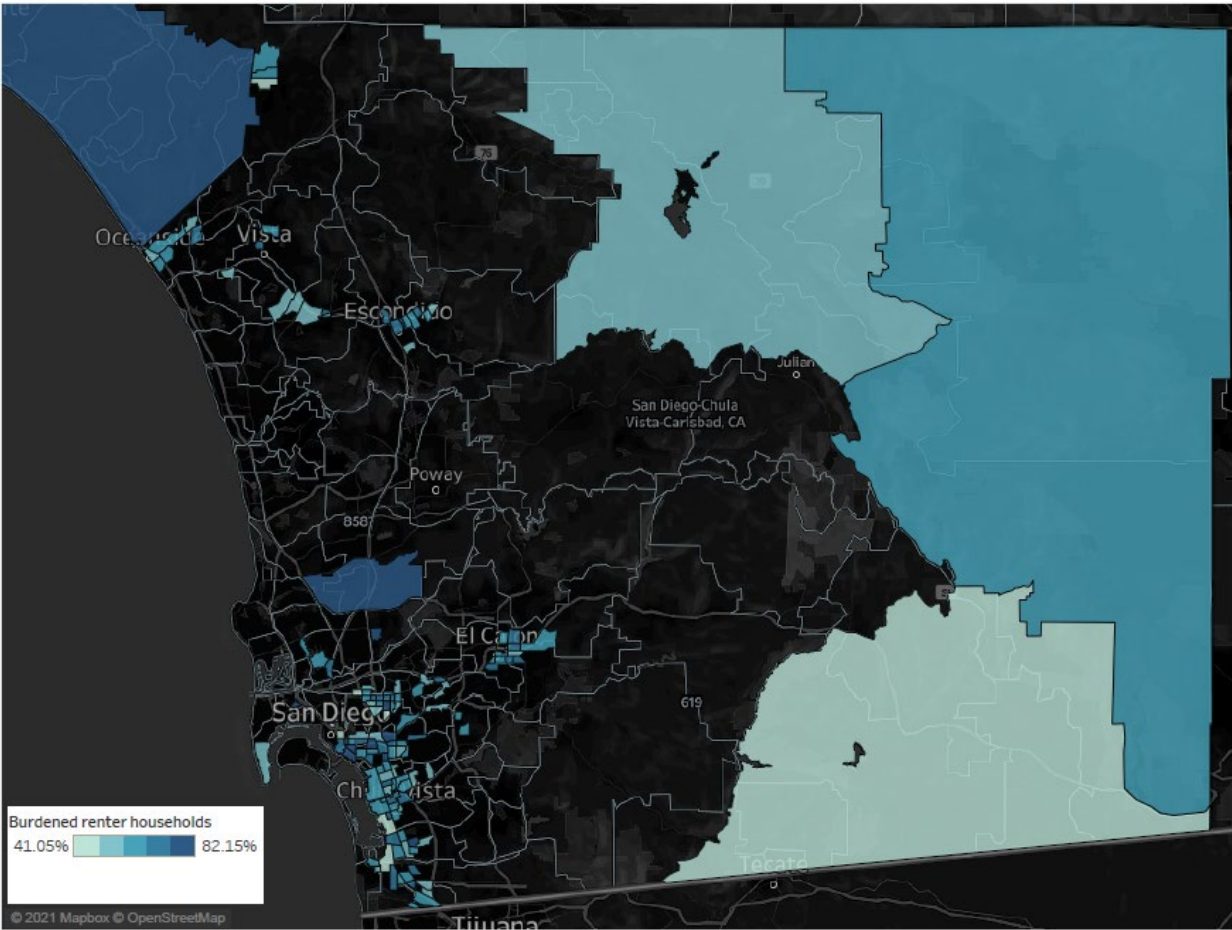
Increasing Rents

The median gross rent in Displacement Risk Areas is over \$1000. According to the San Diego Housing Commission's report on Preserving Affordable Housing, affordable rent in the City of San Diego at Very Low Income, for a two-bedroom unit is \$1,204. Additionally, "almost two-thirds of renter households in San Diego are in the extremely low-income, very low income, or low-income groups, a total of 61 percent".³ Therefore, for 61 percent of renters in San Diego the median gross rent in the most affordable areas of the City is too high leading to rent burden, as 88 percent of households in the extremely low-income and very low-income groups, are housing cost burdened.⁴

3 “Preserving Affordable Housing in the City of San Diego,” San Diego Housing Commission, May 2020. <https://www.sdhc.org/wp-content/uploads/2020/05/Affordable-Housing-Preservation-Study.pdf>, p.19.

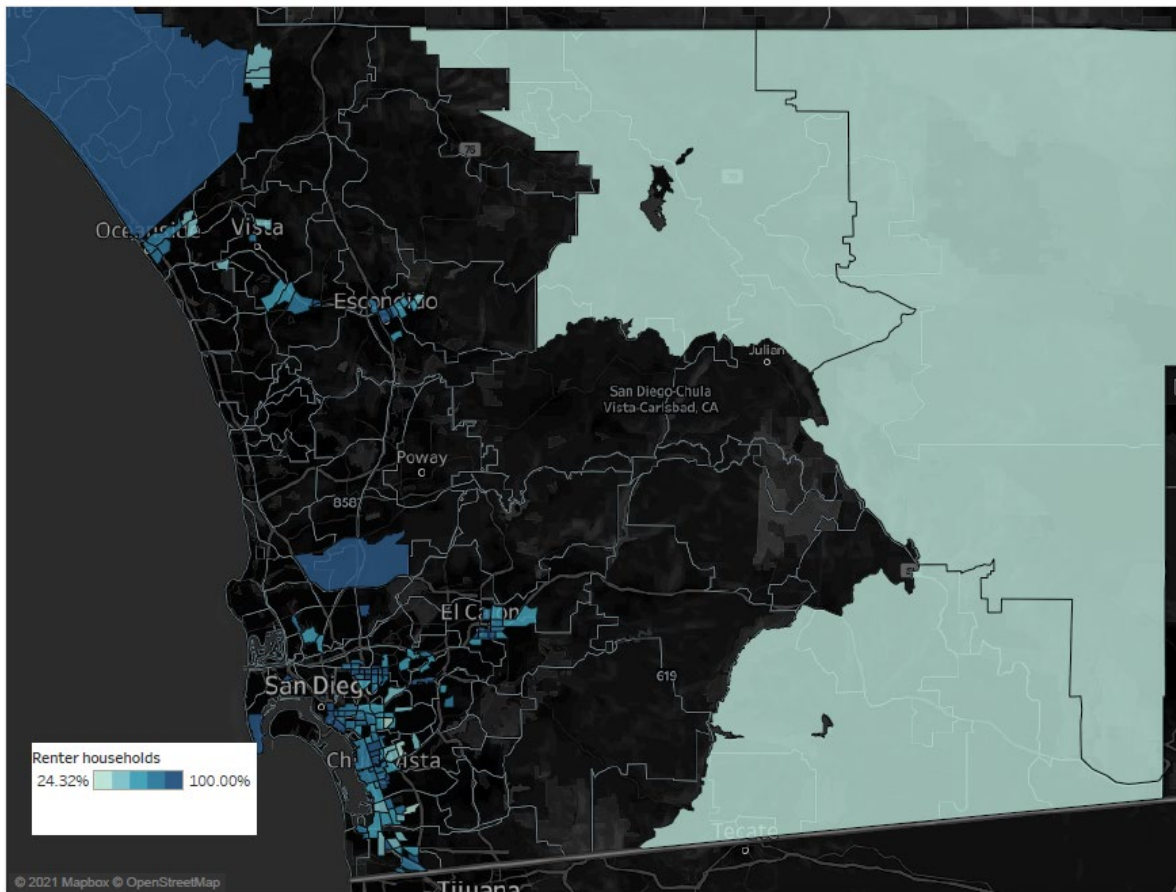
4 “Preserving Affordable Housing in the City of San Diego,” San Diego Housing Commission, May 2020. <https://www.sdhc.org/wp-content/uploads/2020/05/Affordable-Housing-Preservation-Study.pdf>, p.19.

Figure A-92: Percent Rent - Burdened Households in Displacement Risk Areas – San Diego County Region



Rent burden is defined by paying more than 30 percent of household wages on rent. Within the Displacement Risk areas of the San Diego region, close to half or 50 percent of households are rent burdened. With such a high percentage of households with rent burden stability in these areas is low and displacement risk is high.

Figure A-93: Percent Renter Households in Displacement Risk Areas – San Diego County Region



In some areas of the San Diego region the percent of renters is 100 percent within the Displacement Risk Areas. These areas are located within southeast San Diego, in Chula Vista, National City and Otay Mesa. A small area of 100 percent renters also exists in Escondido and El Cajon. Within the rest of the Displacement Areas the percent of renters is still very high, most times about 50 percent. With a high percent of renter households, displacement risk is very high. With increases in rent, households may be forced to find other affordable areas to live.

LOCAL DATA AND KNOWLEDGE

Data collected as part of the AI was summarized in Appendix A, Public Outreach Summary Report.⁵ The outreach was centered around Impediments to Fair Housing Choice. The Outreach consisted of interviews with Stakeholders and Service Providers as well as six community workshops. When Stakeholders were interviewed regarding building awareness for Fair Housing, they indicated that it was difficult to keep up with the constant changes in laws and regulations regarding Fair Housing and many owners and managers were not well informed. Additionally housing instability

⁵ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, Appendix A, https://www.sandiego.gov/sites/default/files/fhaifinal2020_appa_outreachreport.pdf, accessed May 2021.

was caused by “tenants not having a clear understanding of different housing program requirements”.⁶

Additionally, Stakeholders stated that Housing Affordability is a large barrier to housing. Specifically indicating that, “More than 35% of people living in shelters have a job and income but still don’t have the means to an affordable home”.⁷ There is also a shortage of apartments to accommodate large families and those families in need of larger accommodations also lack the financial resources to afford a larger unit. The rental market is tight in the region, therefore landlords can be selective with who they choose to rent from and “often are not following Fair Housing rules”.⁸ Additionally, when affordable housing is found, it may also be of poor quality. Stakeholders noted that many times landlords are unwilling to fix up properties and tenants are not aware of their rights regarding the condition of the rental units. Thus forcing tenants into a substandard housing situation.

Housing affordability, lack of understanding of tenant’s rights under Fair Housing, lack of availability of units, and a tight rental market all lead to displacement risk in the region. When confronted with these issues tenants will be consistently moving to new locations due to substandard housing, increasing rents, and changes in family situations and/or difficult landlord situations. Service providers in the region are available to assist with these situations as they relate to Fair Housing, but a longer-term strategy will address the stability of the displacement risk areas. For instance, the proposed activity in the Housing Element to connect lower-income residents to homeownership in their communities will assist in stabilizing these areas.

OTHER RELEVANT FACTORS

The study conducted by the San Diego Housing Commission (SDHC) in May 2020 regarding “Preserving Affordable Housing in the City of San Diego” found that, “The continued erosion of San Diego’s deed-restricted and naturally occurring affordable housing (NOAH) inventory threatens San Diegans’ quality of life. Without intervention, at-risk affordable homes will continue to be lost. San Diego cannot solely rely on new construction of housing units to mitigate the housing affordability crisis the City faces; this necessitates a robust preservation strategy”.⁹ A large number of the Naturally Occurring Affordable Housing (NOAH) units within the City of San Diego are located in the Displacement Risk areas from the SDHC report and included below as Figure A-94. According to the study, “approximately 78 percent of the City’s NOAH units are in census tracts with median incomes below the City average, compared to 62 percent of the multifamily rental housing stock overall”.¹⁰ The study also found that preservation of NOAH units is more cost effective than building new affordable housing units and proposed ten recommendations to preserve NOAH units within the City. The recommendations generally fell along the lines of establishing capital resources for funding activities, creating

⁶ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, Appendix A, pA-30.

⁷ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, Appendix A, pA-30.

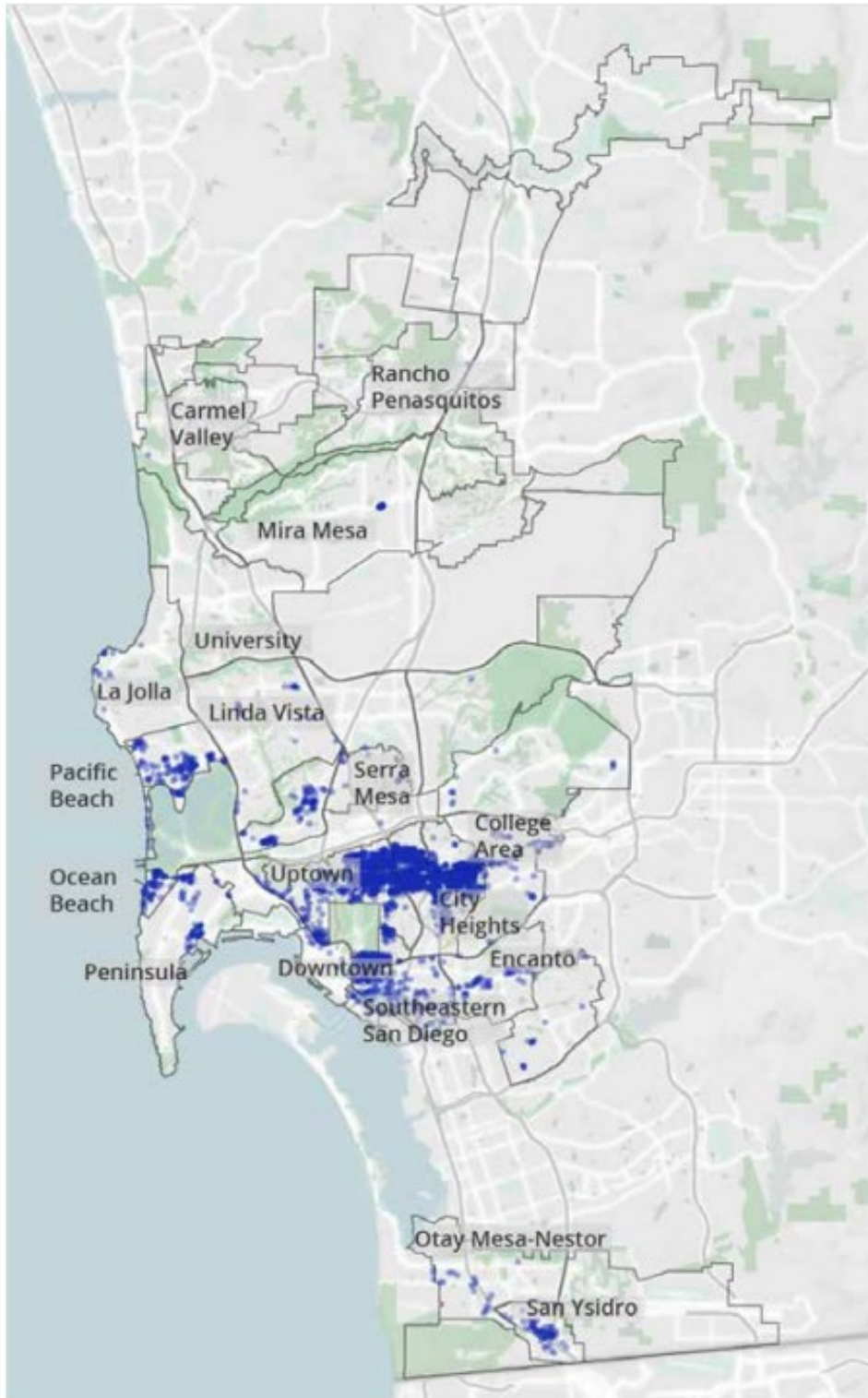
⁸ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, Appendix A, pA-31.

⁹ “Preserving Affordable Housing in the City of San Diego,” San Diego Housing Commission, May 2020. <https://www.sdhc.org/wp-content/uploads/2020/05/Affordable-Housing-Preservation-Study.pdf>, p46.

¹⁰ “Preserving Affordable Housing in the City of San Diego,” San Diego Housing Commission, May 2020. <https://www.sdhc.org/wp-content/uploads/2020/05/Affordable-Housing-Preservation-Study.pdf>, p41.

preservation policies, establishing tenant protections, and capacity building such as creating a preservation collaboration between governmental and private stakeholders.

Figure A-94: Parcels with Naturally Affordable Unrestricted Units



CONCLUSIONS, SUMMARY OF ISSUES, AND CONTRIBUTING FACTORS

When reviewing available information regarding local and regional patterns and trends within displacement risk areas, it appears that within the areas the average median income is low and a very small percentage of the population within the displacement risk areas have a college degree. Additionally, more than 50 percent of the population within the displacement risk areas lack a high school degree. The majority of the displacement risk areas have a high rent, leading to a high rent burden for the majority of the population with the displacement risk areas. While most of the population within displacement risk areas within the City of San Diego are renters, it is not true for displacement risk areas within the region.

Almost all displacement risk areas within the City of San Diego are disadvantaged and most of the housing is Naturally Occurring Affordable Housing. This indicates that any investment within the displacement risk areas can lead to further gentrification of these neighborhoods. While the City is brainstorming ways to increase the housing inventory and up zoning and re-zoning is being discussed, it is clear that any re-zone or up-zone will need to incorporate the mandatory affordable housing component to ensure housing for all income categories is provided.

SITES INVENTORY

LOCAL PATTERNS AND TRENDS

Potential sites for housing and lower income housing have been identified throughout the City based predominantly on existing community plans and zoning. The General Plan's City of Villages strategy, which aims focus growth into mixed-use activity centers that are pedestrian-friendly, centers of community, and linked to the regional transit system, and the Climate Action Plan (CAP), which aims to substantially reduce the City's greenhouse gas emissions, have guided and continue to guide updates to the City's community plans. To meet the needs of the City and its citizens while implementing the General Plan and CAP, community plan updates aim to identify opportunities for transit- and active transportation-oriented housing and housing densities near existing and planned transit service, areas with supportive infrastructure and public facilities, and employment areas.

Fair housing opportunities and fair access to opportunity and resources are also important planning considerations, in order to support the well-being of the residents of San Diego and the City as a whole. The City's adequate sites inventory (total/above moderate and moderate income suitable sites, and lower income suitable sites) has been mapped in comparison to the following fair housing information:

- Minority concentration areas
- Poverty concentration areas
- Racially and ethnically concentrated areas of poverty (RECAPs)
- 2019 California Tax Credit Allocation Committee (CTCAC) high and highest resource areas
- Deed-restricted affordable housing sites
- Displacement risk areas

The terms "minority concentration areas," "poverty concentration areas," and "racially and ethnically concentrated areas of poverty (RECAP)" are utilized consistent with the 2021-2025 San Diego County Regional Analysis of Impediments to Fair Housing Choice and defined as follows:

- Minority concentration area: a census block group with a proportion of minority households that is greater than the overall San Diego County minority average of 50.8 percent
- Poverty concentration area: area where the proportion of persons living in poverty is greater than the countywide rate (13.3 percent of the population according to the 2013-2017 ACS estimates)
- Racially and ethnically concentrated area of poverty: census tracts with a majority non-White population (greater than 50 percent) and a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower

The methodology used by CTCAC for its 2019 Opportunity Mapping, which is the source for the high and highest resource areas data, can be found here: <https://www.treasurer.ca.gov/ctcac/opportunity/final-opportunity->

[mapping-methodology.pdf](#). Displacement risk areas are identified using the methodology described in the Displacement Risk section of this Appendix.

Table A-34 summarizes the data shown on the maps found in this section. The maps of suitable sites compared to fair housing-related information are also briefly described below. Due to the importance locating housing capacity in proximity to transit to implementing the General Plan and meeting the goals of the Climate Action Plan, each map shows transit priority areas in relation to the adequate sites and fair housing-related information.

Table A-34: Adequate Sites & Fair Housing Considerations

	All Areas	Minority Concentration Areas	Poverty Concentration Areas	RECAPs	CTCAC High & Highest Resource Areas	Displacement Risk Areas
Total Sites	11,804	3,573	6,858	768	5,722	4,285
Sites (% Total)	--	30.2%	58.1%	6.5%	48.5%	36.3%
Total Net Potential Units	174,673	59,006	88,997	9,121	86,592	37,905
Net Potential Units (% Total)	--	33.8%	50.1%	5.2%	49.6%	21.7%
Above Moderate & Moderate Income Sites	11,804	3,573	6,858	768	5,722	4,285
Above Moderate & Moderate Income Sites (% Total)	100%	30.2%	58.1%	6.5%	48.5%	36.3%
Above Moderate & Moderate Income Net Potential Units	174,673	59,006	88,997	9,121	86,592	37,905
Above Moderate & Moderate Income Net Potential Units (% Total)	100%	33.8%	50.1%	5.2%	49.6%	21.7%
Lower Income Suitable Sites ¹	1,036	437	595	43	375	213
Lower-Income Suitable Sites ¹ (% Total)	8.8%	42.2%	57.4%	4.2%	36.2%	20.6%
Lower Income Net Potential Units ²	72,191	29,848	37,975	3,959	30,490	13,291

Lower Income Net Potential Units ² (% Total)	41.3%	41.3%	52.6%	5.5%	42.2%	18.4%
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¹ Sites meeting Government Code Section 65583.2 criteria for sites suitable for lower income development. See “Suitability of Sites for Lower Income Housing” section above for additional information.

² Potential housing units on sites meeting Government Code Section 65583.2 criteria for sites suitable for lower income development. See “Suitability of Sites for Lower Income Housing” section above for additional information.

Minority Concentration Areas and Housing Potential: Figures A-95 & A-96

Of the City's total suitable sites, 30.2% are located in minority concentration areas along with 33.8% of its total potential housing units; as well as 30.2% of its above moderate and moderate income suitable sites and 33.8% of above moderate and moderate income potential housing units; and 42.2% of its lower income suitable sites and 41.3% of its potential lower income housing units. Compared to the total and above moderate/moderate suitable sites and net potential units, more lower income suitable sites and lower income potential housing units (12% and 7.5% more, respectively) are located in minority concentration areas. Concentrations of lower income suitable sites and potential housing units in minority concentration areas are found in the Otay Mesa, Encanto, Mission Valley, Navajo, and Kearny Mesa communities. This is due to the larger parcel sizes and concentrations of higher density-zoned sites in transit priority areas in these communities, as required by the lower income site suitability criteria.

More than half of lower income suitable sites (57.8%, 599 sites) and more than half of the lower income potential housing units (58.7%, 42,343 units) are located outside of minority concentration areas. Therefore, there is substantial potential for the adequate sites inventory to improve minority concentration conditions within the City of San Diego. Nevertheless, a substantial portion of lower income suitable sites and potential units are located in minority concentration areas. Based on the City's RHNA need of 44,860 lower income housing units and identified housing capacity, some lower income housing units will in all probability be built in minority concentration areas.

Poverty Concentration Areas and Housing Potential: Figures A-97 & A-98

Of the City's total suitable sites, 58.1% are located in poverty concentration areas along with 50.1% of its total potential housing units; as well as 58.1% of its above moderate and moderate income suitable sites and 50.1% of above moderate and moderate income potential housing units; and 57.4% of its lower income suitable sites and 52.6% of its potential lower income housing units. Compared to the total and above moderate/moderate suitable sites and net potential units, fewer lower income suitable sites (0.7% fewer) and more lower income net potential housing units (2.5% more) are located in poverty concentration areas. Concentrations of lower income suitable sites and potential housing units in poverty concentration areas are found in the Encanto, Mid-City: City Heights, Mid-City: Eastern Area, College Area, Midway-Pacific Highway, Mission Valley, Navajo, Linda Vista, Clairemont Mesa, and Pacific Beach communities. The greater percentage of lower income potential housing units in poverty concentration areas is likely due to the concentrations of higher density-zoned sites in transit priority areas in these communities.

Fewer than half of lower income suitable sites (42.6%, 441 sites) and slightly fewer than half of the lower income potential housing units (47.4%, 34,216 units) are located outside of poverty concentration areas. There is potential for the adequate sites inventory to exacerbate poverty concentration conditions but also potential for the sites inventory to improve poverty concentration conditions by providing lower income affordable housing outside of areas of concentrated poverty. Based on the City's RHNA need of 44,860 lower income housing units and identified housing capacity, some lower income housing units will in all probability be built in poverty concentration areas.

RECAPs and Housing Potential: Figures A-99 & A-100

Of the City's total suitable sites, 6.5% are located in RECAPs along with 5.2% of its total potential housing units; as well as 6.5% of its above moderate and moderate income suitable sites and 5.2% of above moderate and moderate income potential housing units; and 4.2% of its lower income suitable sites and 5.5% of its potential lower income housing units. Compared to the City's suitable sites and net potential units as a whole, fewer lower income suitable sites (2.3% fewer) and slightly more (0.3% more) lower income net potential housing units are located in RECAPs. Concentrations of lower income suitable sites and housing units in RECAPs are found in the Encanto, Southeastern San Diego, Downtown, and Mid-City: City Heights communities. The large majority of lower income suitable sites and potential housing units are located outside of RECAPs. Therefore, the sites inventory is likely to improve RECAP conditions in the City.

CTCAC High & Highest Resource Areas and Housing Potential: Figures A-101 & A-102

Of the City's total suitable sites, 48.5% are located in CTCAC high or highest resource areas along with 49.6% of its total potential housing units; as well as 48.5% of its above moderate and moderate income suitable sites and 49.6% of above moderate and moderate income potential housing units; and 36.2% of its lower income suitable sites and 42.2% of its potential lower income housing units. Compared to the City's suitable sites and net potential units as a whole, fewer lower income suitable sites and lower income net potential housing units (12.3% and 7.4% fewer, respectively) are located in high or highest resource areas. Concentrations of lower income sites and housing units in high and highest resource areas are found in the Peninsula, Mission Valley, Navajo, Linda Vista, Clairemont Mesa, Pacific Beach, Mira Mesa, and Carmel Mountain Ranch communities. These concentrations are due to the larger parcel sizes and higher density-zoned sites in transit priority areas in these communities, which are consistent with the lower income housing suitability criteria in state law.

Fewer than half of lower income suitable sites (375 sites) and the lower income potential housing units (30,490 units) are located in high or highest resource areas. Therefore, there is potential for the adequate sites inventory to exacerbate access to opportunity conditions but also potential for the sites inventory to improve access to opportunity for some residents by providing lower income affordable housing in high or highest opportunity areas. Based on the City's RHNA need of 44,860 lower income housing units and identified housing capacity, some lower income housing units will in all probability be built in areas of low to moderate resources.

The City is currently in the process of updating the community plans for the Clairemont Mesa, Mira Mesa, and University communities, all of which are high resource areas with larger parcel sizes, to identify more opportunities for transit-supportive housing densities near existing and planned transit routes. These community plan updates, which will include rezoning of sites, are likely to increase opportunities for lower-

income housing in high resource areas and are anticipated to be completed during the 6th Housing Element cycle.

Existing Affordable Housing and Housing Potential: Figures A-103 & A-104

Compared to the locations of existing deed-restricted affordable housing developments in the City, there are lower income suitable sites both in proximity to existing deed-restricted affordable housing and in areas of the City with fewer or no existing deed-restricted affordable housing.

Displacement Risk Areas and Lower Income Housing Potential: Figure A-105 & A-106

Of the City's total suitable sites, 36.3% are located in displacement areas along with 21.7% of its total potential housing units; as well as 36.3% of its above moderate and moderate income suitable sites and 21.7% of above moderate and moderate income potential housing units; and 20.6% of its lower income suitable sites and 18.4% of its potential lower income housing units. Concentrations of total/above moderate and moderate income suitable housing sites and lower income housing suitable sites in displacement risk areas are found in the Mid-City: City Heights, Mid-City: Eastern Area, Mid-City: Normal Heights, Barrio Logan, Downtown, Golden Hill, Southeastern San Diego, and Encanto communities. Smaller areas of displacement risk are found in the Uptown, North Park, Mid-City: Kensington-Talmadge, College Area, Linda Vista, Clairemont Mesa, and Skyline-Paradise Hills communities. The proportions of total/above moderate and moderate income and lower income suitable sites and potential housing units in displacement areas is likely due to the concentrations of higher density-zoned sites in transit priority areas, which is consistent with the City's General Plan and Climate Action Plan. It is likely that the sites inventory will exacerbate displacement conditions due to the colocation of existing high frequency transit routes with a substantial portion of the City's naturally occurring affordable housing supply.

There are some measures which will lessen displacement in displacement risk areas during the 6th Housing Element Cycle. The low and very low income housing unit replacement requirements of SB 330, implemented through the Dwelling Unit Protection Regulations in Chapter 14 Article 3 Division 12 of the City's Municipal Code, will apply to all development permitted before January 1, 2025 (<https://docs.sandiego.gov/municode/MuniCodeChapter14/Ch14Art03Division12.pdf>). Also, the City is currently in the process of updating the community plans for the Clairemont Mesa, Mira Mesa, University, College Area, and Uptown communities, which have smaller or no areas of displacement risk. These community plan updates, which will include rezoning of sites, will identify more opportunities for transit-supportive housing densities near existing and planned transit routes. Additional housing capacity outside of displacement risk areas may somewhat decreased displacement pressure on identified adequate sites. These community plan updates are anticipated to be completed during the 6th Cycle. Further, the San Diego Association of Governments (SANDAG) is currently in the process of developing a new Regional Plan which reexamines transportation patterns and demand and reimagines the County's public transit system. Once the Regional Plan is adopted, which will occur during the 6th Cycle, the City can identify additional opportunities for transit-supportive plans and housing densities outside of displacement risk areas.

Figure A-95: Location of Lower Income Suitable Adequate Sites Compared to Minority Concentration Areas

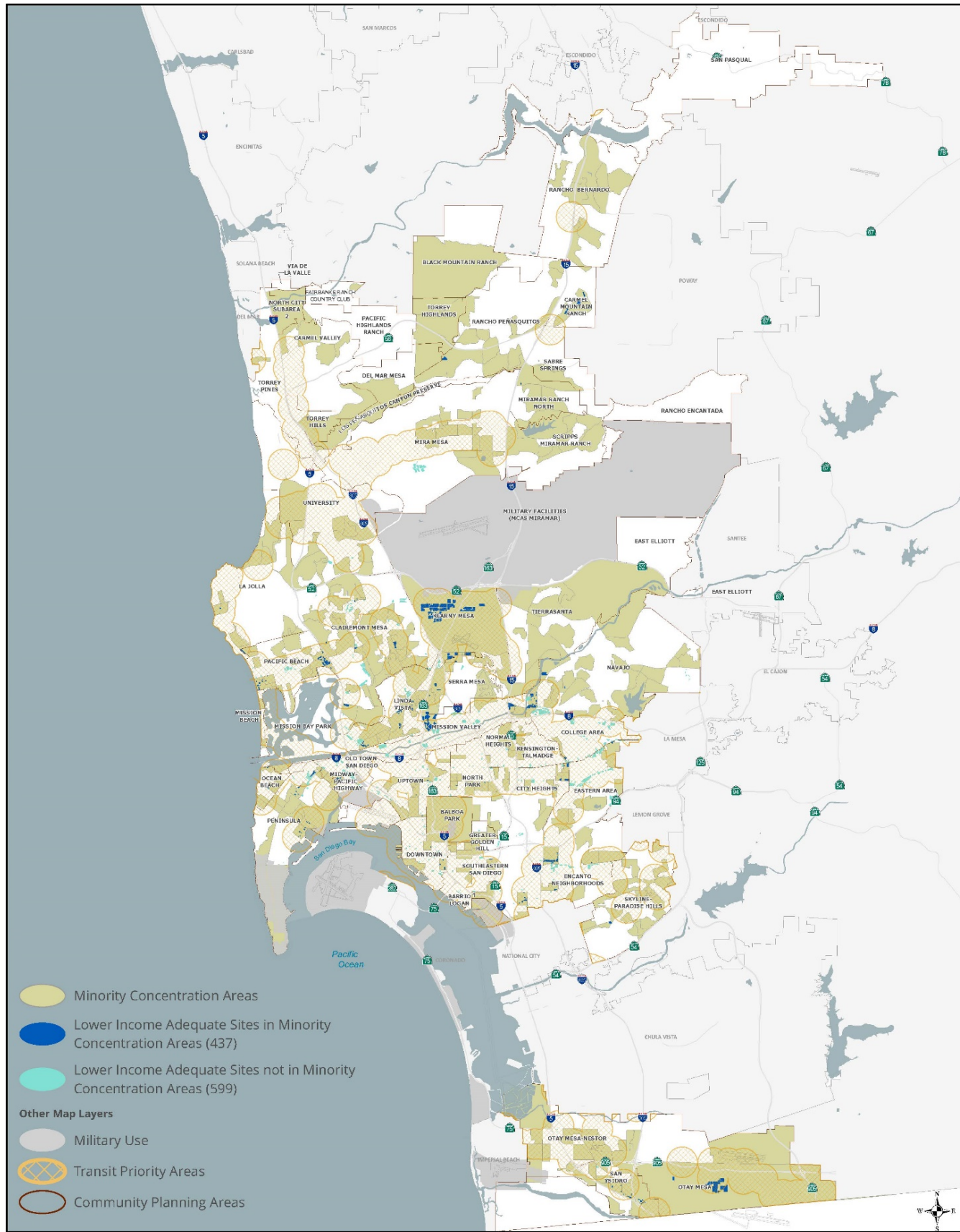


Figure A-96: Location of Adequate Sites Compared to Minority Concentration Areas

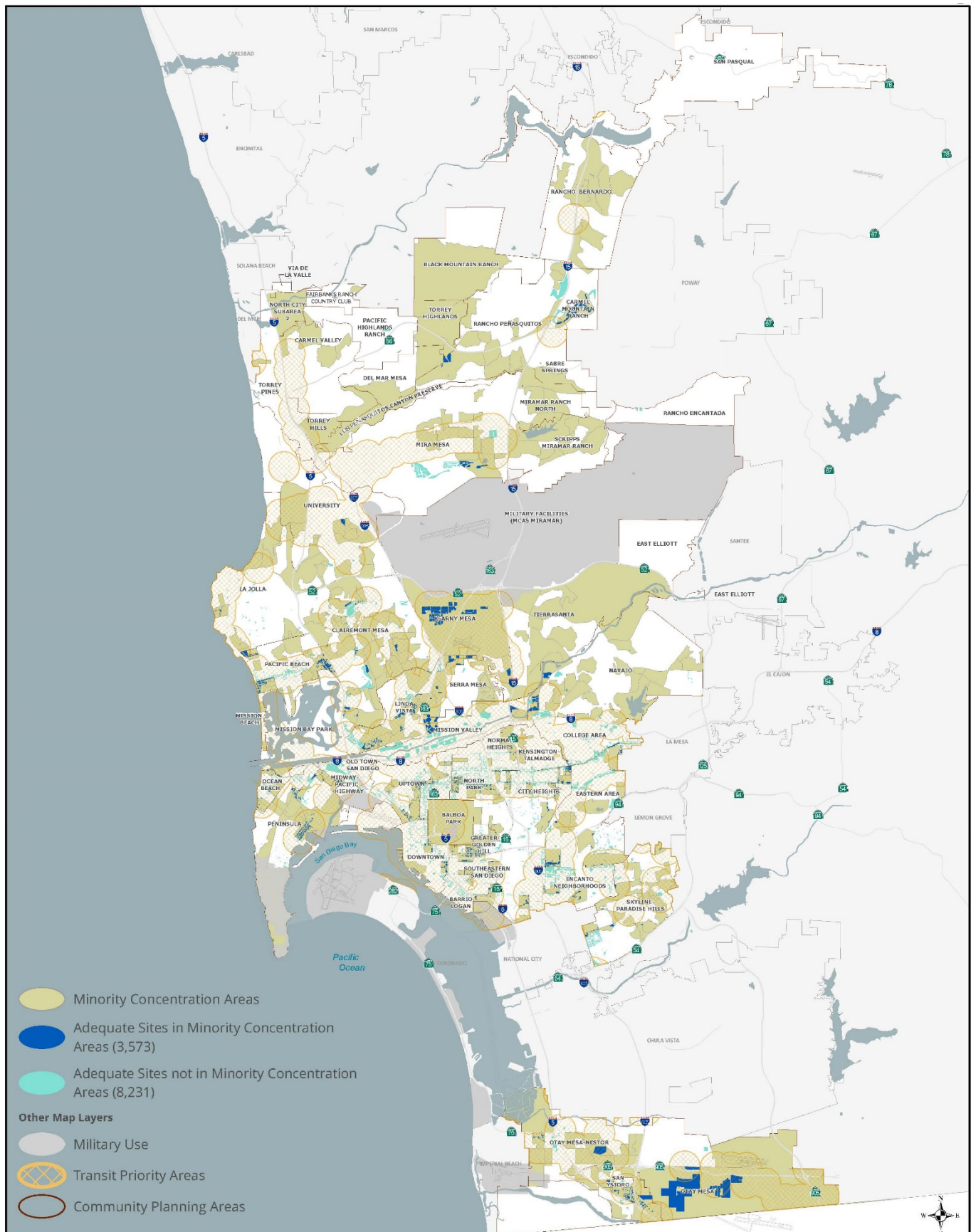


Figure A-97: Location of Lower Income Suitable Adequate Sites Compared to Poverty Concentration Areas

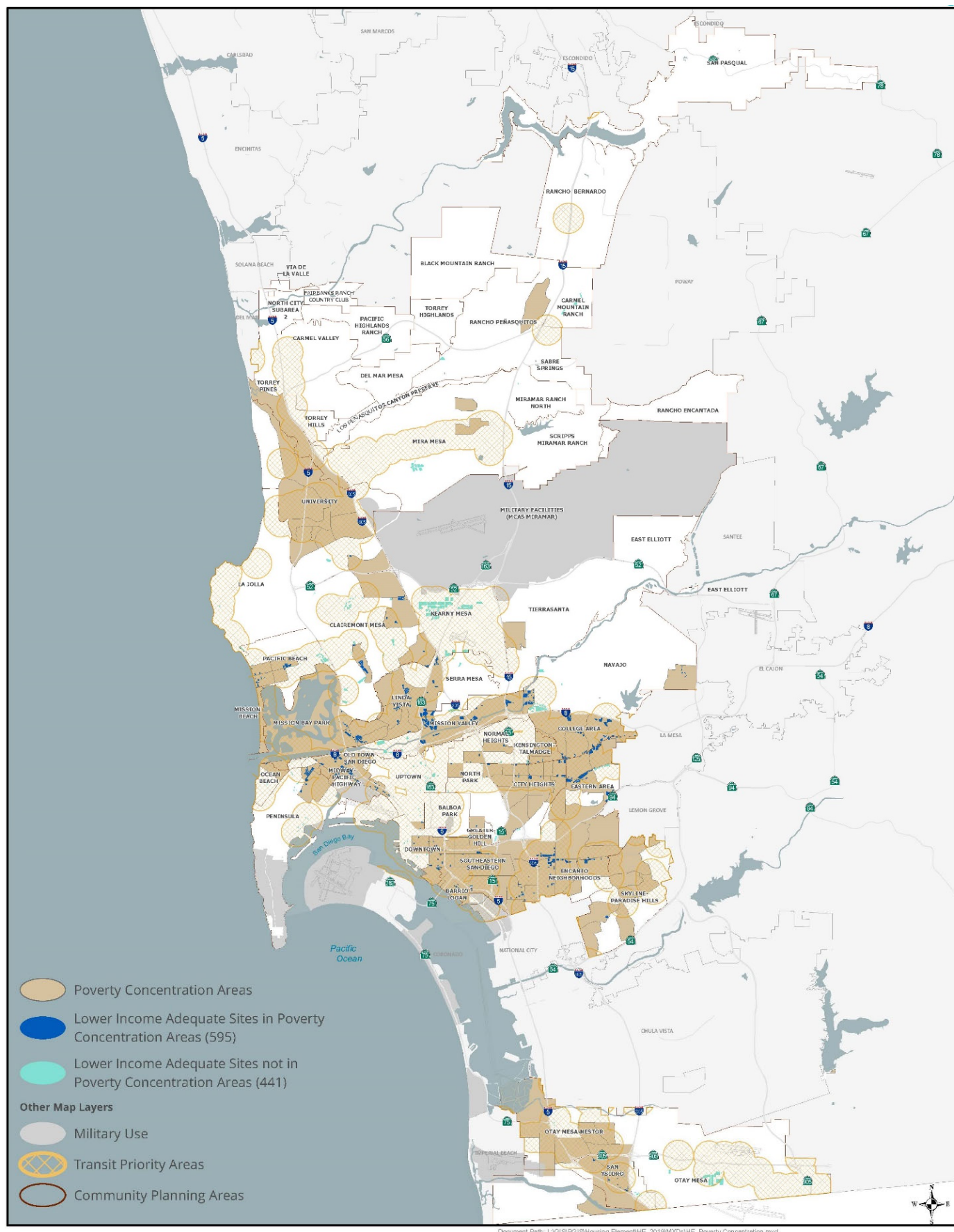
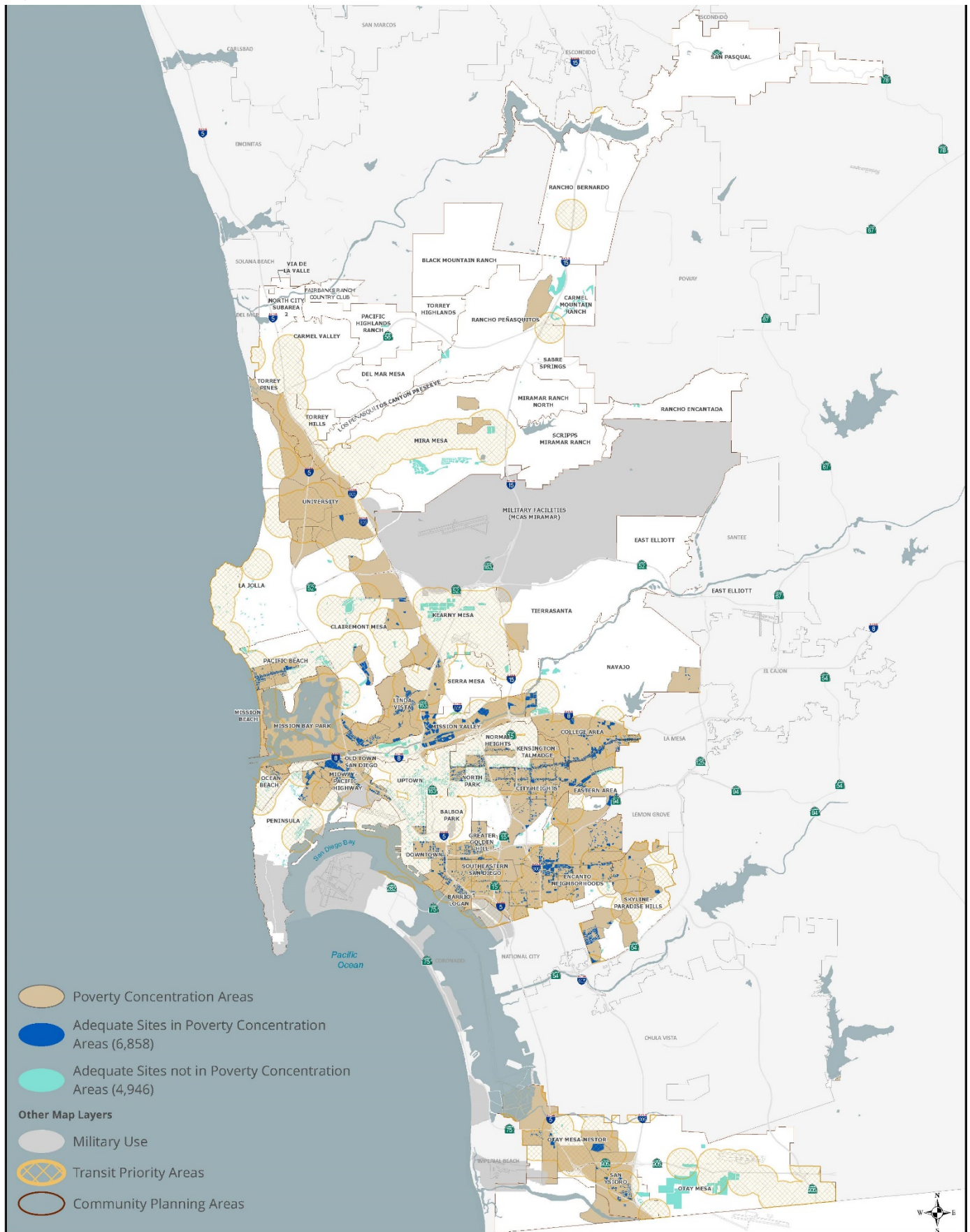


Figure A-98: Location of Adequate Sites Compared to Poverty Concentration Areas



Legend:

- Racially and Ethnically Concentrated Areas of Poverty (R/ECAP Areas)
- Lower Income Adequate Sites in R/ECAP Areas (43)
- Lower Income Adequate Sites not in R/ECAP Areas (993)
- Military Use
- Transit Priority Areas
- Community Planning Areas

Figure A-100: Location of Adequate Sites Compared to Racially and Ethnically Concentrated Areas of Poverty (RECAPs)

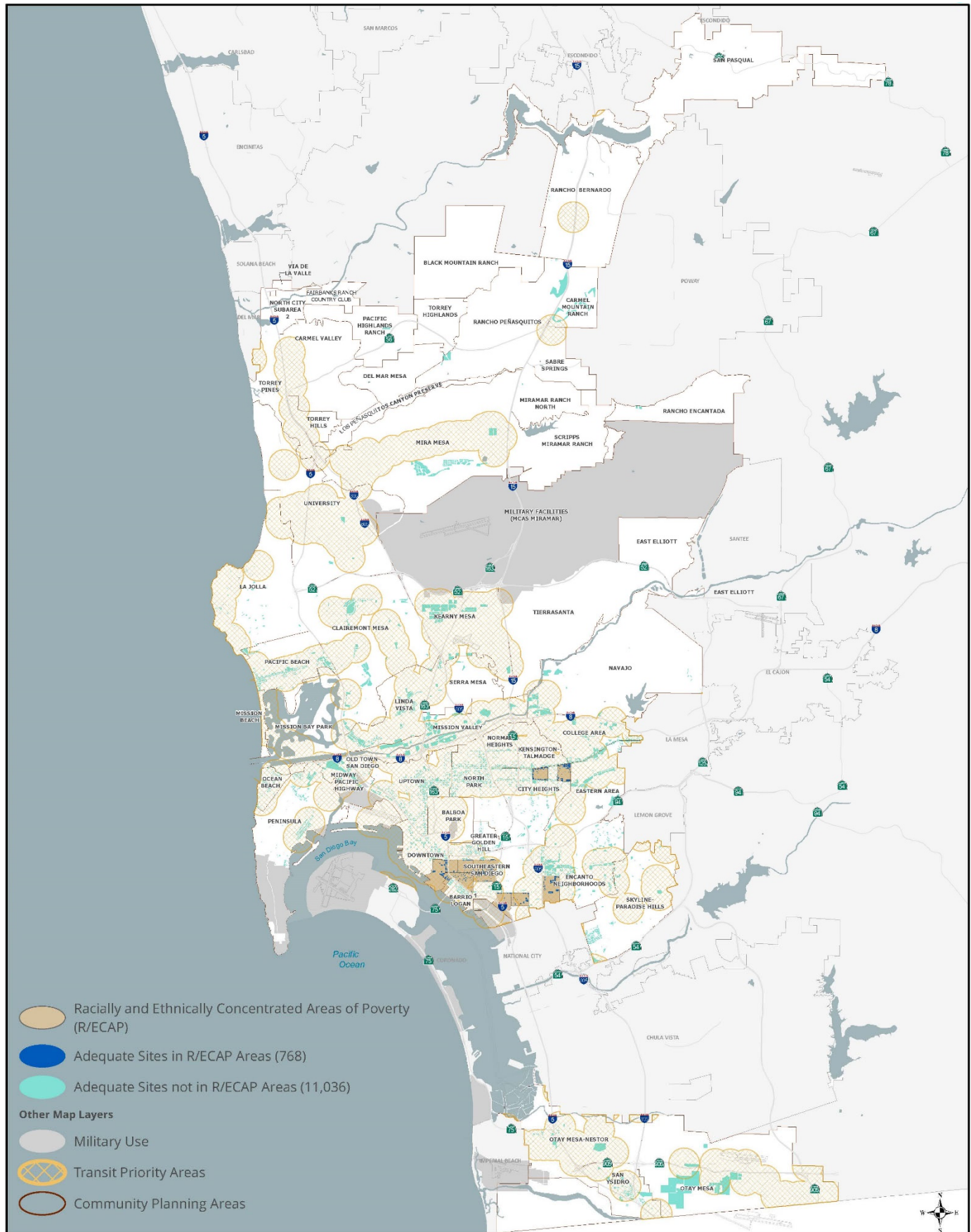


Figure A-101: Location of Lower Income Suitable Adequate Sites Compared to CTCAC High and Highest Resource Areas

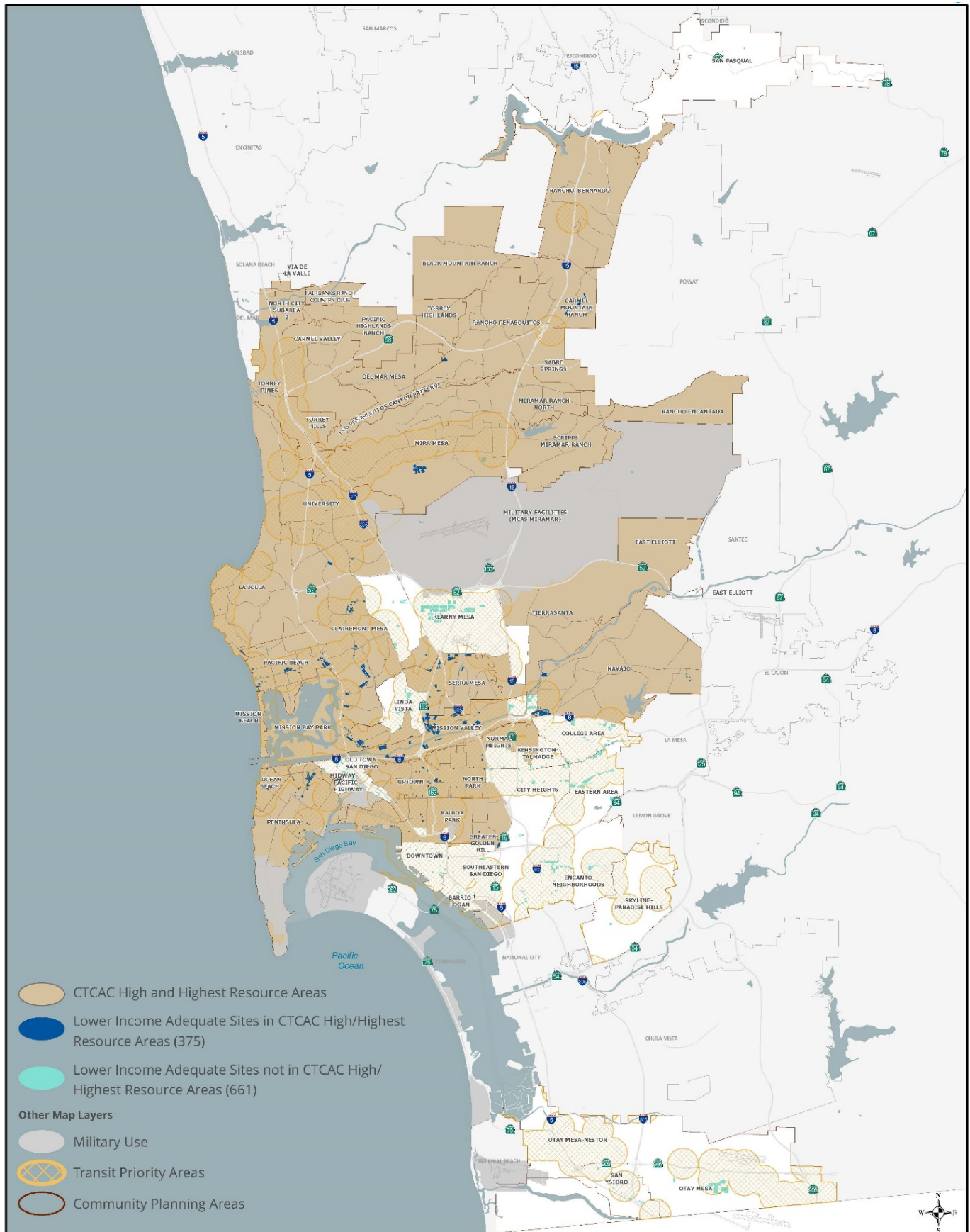


Figure A-102: Location of Adequate Sites Compared to CTCAC High and Highest Resource Areas

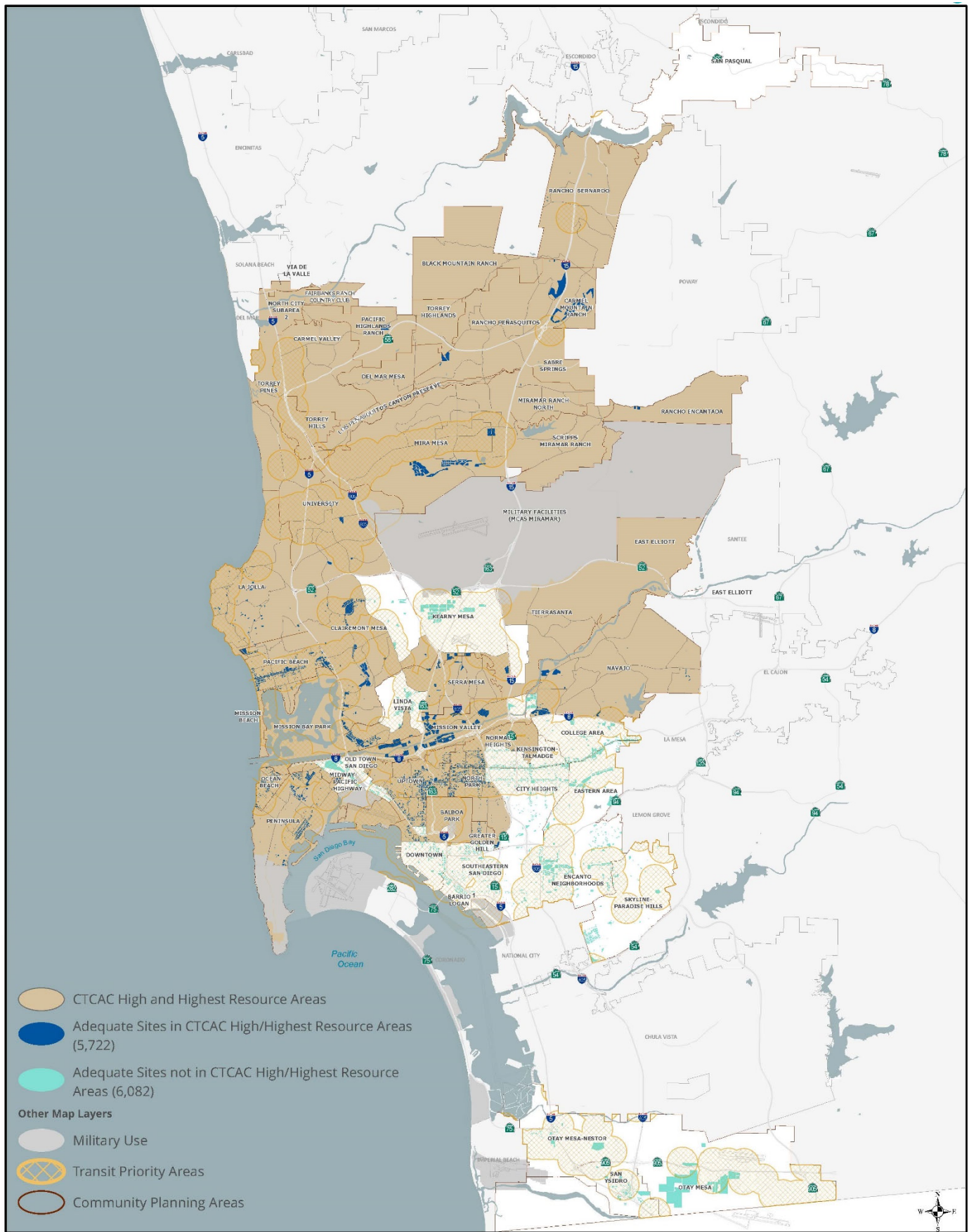


Figure A-103: Location of Lower Income Suitable Adequate Sites Compared to Existing Deed-Restricted Affordable Housing

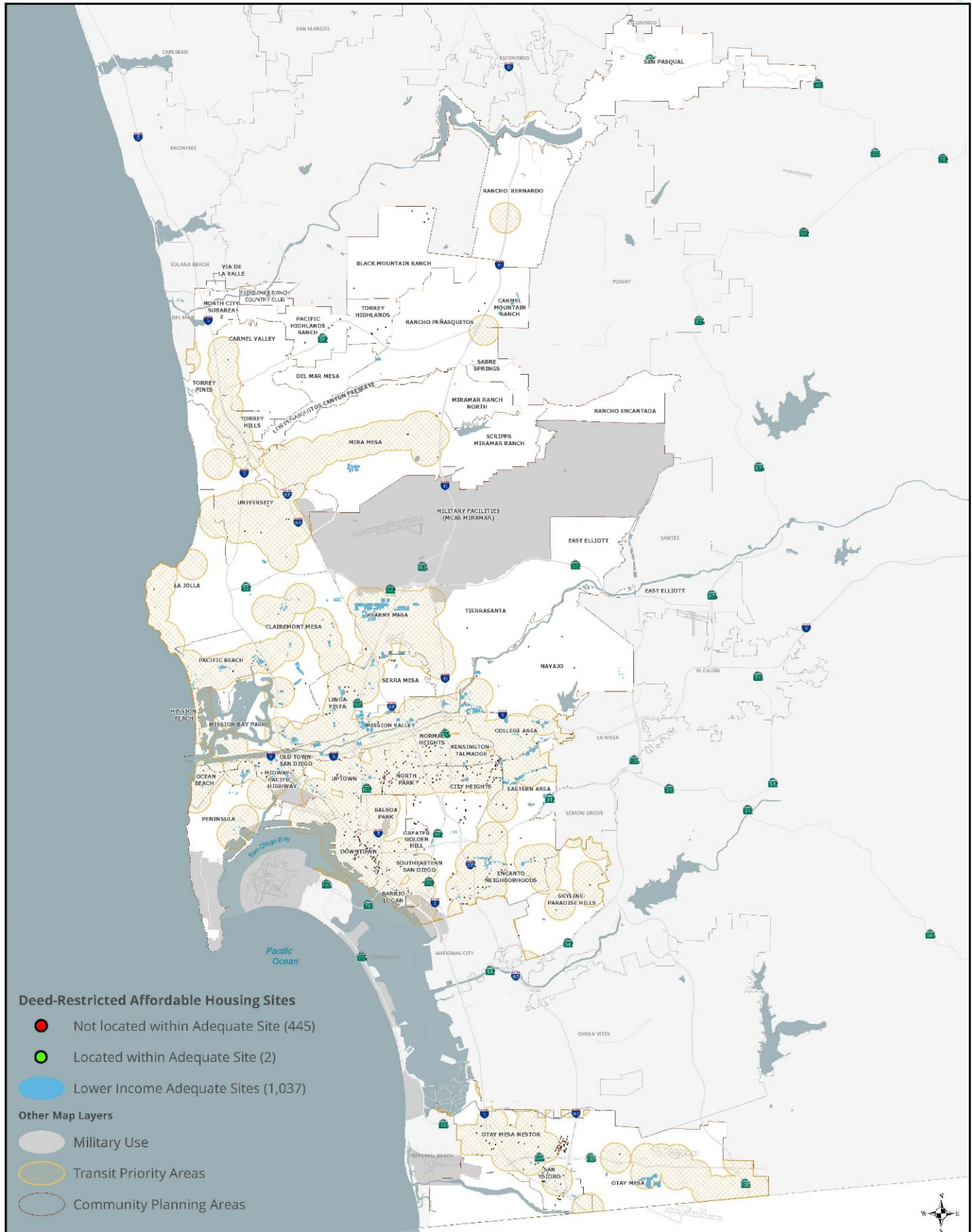


Figure A-104: Location of Adequate Sites Compared to Existing Deed-Restricted Affordable Housing

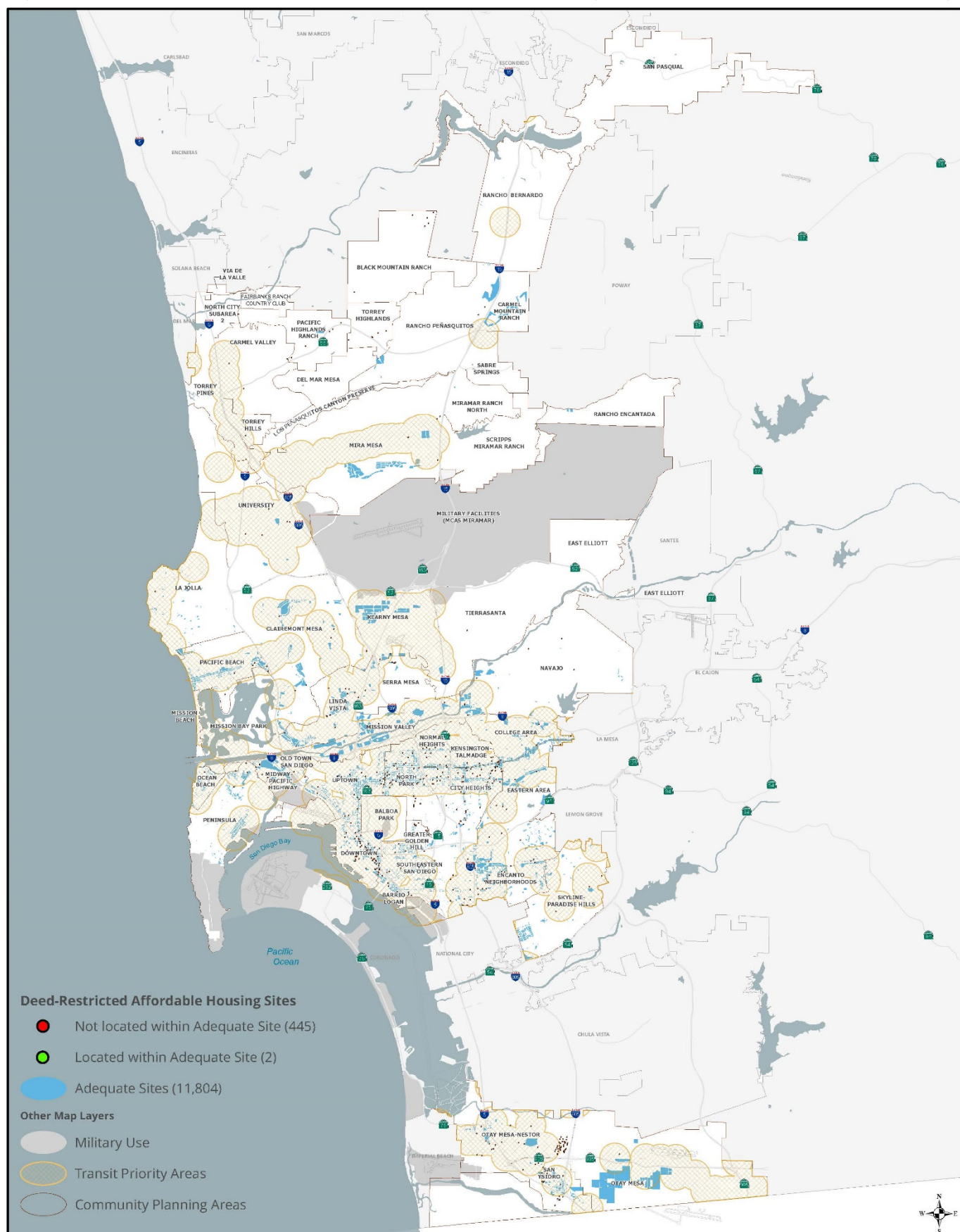


Figure A-105: Location of Lower Income Suitable Adequate Sites Compared to Displacement Risk Areas

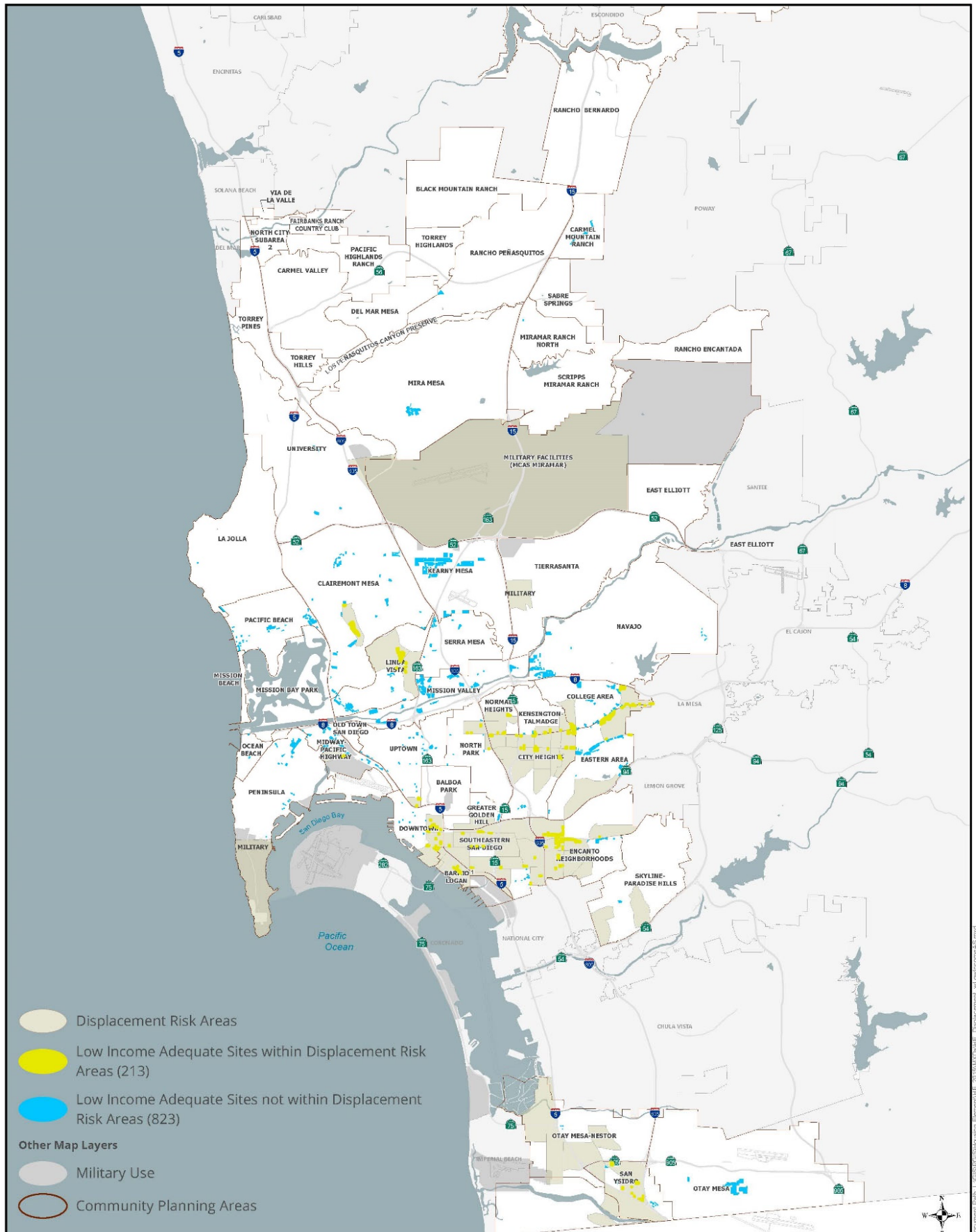
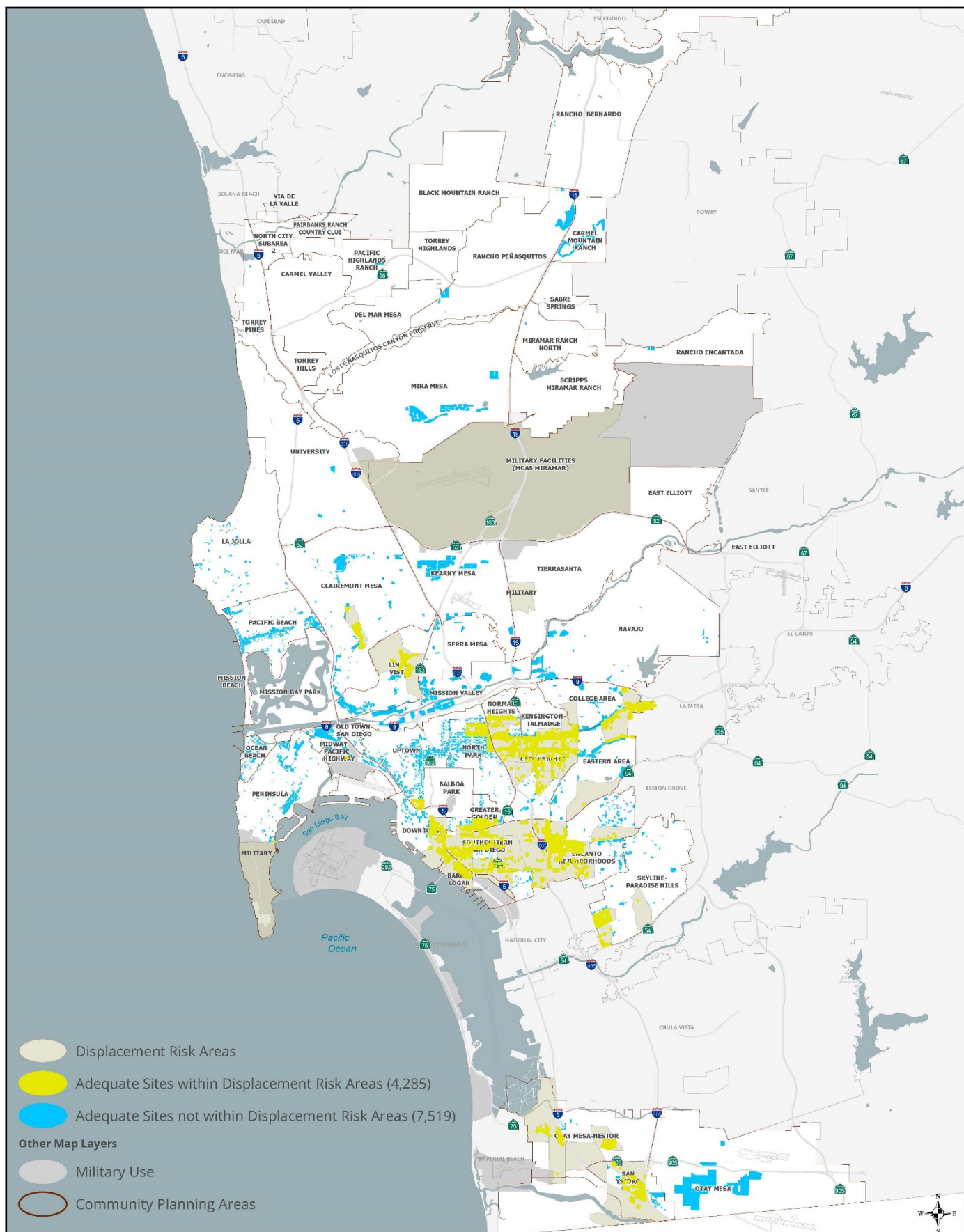


Figure A-106: Location of Adequate Sites Compared to Displacement Risk Areas



ADEQUATE SITES & HOUSING CAPACITY CONCENTRATION ANALYSIS

This section evaluates whether the housing capacity by income category identified in the adequate sites inventory is concentrated in any areas of the city, and what any such concentration means for fair housing choice in the city.

The adequate sites inventory has identified developable housing capacity primarily in urban communities and in suburban communities that include employment centers and/or are connected to the existing or planned high-quality transit routes. This distribution of housing capacity results from a number of factors, including the development history and urban form of the City; past history of and current plans for investment in the City's public transportation system; the policies of the City's General Plan (adopted in 2008), including the City of Villages strategy which calls for growth to be focused into mixed-use activity centers that are pedestrian-friendly districts linked to an improved regional transit system; the City's Climate Action Plan, which guides actions including land use planning to reduce greenhouse gas emissions; and the work program and capacity of the City's Planning Department. Appendix D (Adequate Sites Inventory) Figure HE-D-1 shows the communities for which community plans have been updated or amended since adoption of the General Plan and the wide geographic extent of those communities.

Appendix D also includes Table HE-D-2, which provides the Housing Capacity in Housing Units by Community, with Community Typology, identified through the site inventory. Community typology is included in the table for the purposes of assessing past development trends and future development likelihood. The typologies identified for the City's communities are:

- Urban Core – the area of the most intensive development in the City, i.e. the Downtown community.
- Urban Tier 1 – Communities that possess many urban qualities and moderate residential density but less intensity than in Downtown. These communities were often built around San Diego's early streetcar lines that were first constructed in the 1910-1920s.
- Urban Tier 2 – Communities that include a mix of urban and suburban development patterns, or a mix of residential and non-residential areas in an urban development pattern.
- Suburban Tier 1 – Communities with development patterns that reflect early sprawl and automobile-dependent development patterns. These communities were primarily developed in the 1950s during the post-World War II development boom.
- Suburban Tier 2 – These communities are the newer communities built in the City, lie the furthest from Downtown, and primarily consist of development through specific plans and large, mass-built subdivisions. Development in these communities is highly auto-oriented, and several of these are former greenfield (undeveloped) communities that are currently developing or completing development.

While the adequate sites inventory assessed housing capacity throughout the City based on adopted and draft land use plans and zoning, as described in detail in Appendix D, the distribution of housing capacity among the City's communities reflects the City's development history, its community typologies, and the Planning Department's work program since adoption of the current General Plan. Table A-35 below combines adequate sites inventory total capacity, above moderate and moderate income capacity, and lower income capacity with community typology, footnotes indicating recent or in-process land use plan and zoning changes. It also ranks adequate sites inventory housing capacity by income category by community (from rank 1 to 37 in descending order of capacity).

Interpreting the information in Table A-35, most of the City's total and lower income housing capacity is located within communities in the Urban Core, Urban Tier 1, Urban Tier 2, and Suburban Tier 1 communities. Some capacity has also been identified in the Suburban Tier 2 communities of Mira Mesa and Otay Mesa, both of which are employment centers and include areas undergoing transition from relatively undeveloped conditions to developed conditions. The majority of Suburban Tier 2 communities, which are largely in the northern portions of the City and began substantial development in the 1970s or later, feature expansive areas of low-density single-family residential development, and have auto-oriented urban form, have low or zero available capacity. Differences in rank and capacity between total/above moderate and moderate income capacity and lower income capacity are most notable in the following communities:

- Uptown, North Park, and Mid-City: City Heights: Differences in ranks and capacity due to small parcel sizes that do not meet the State's criteria for lower income housing suitability
- Otay Mesa and Mira Mesa: Differences in ranks and capacity due to large parcel sizes, and low zoned housing densities pending the preparation of specific plans and land use plan amendments, that do not meet the State's criteria for lower income housing suitability
- Mission Valley: Difference capacity due to large parcel sizes that do not meet the State's criteria for lower income housing suitability
- Downtown and many other communities: Difference in capacity due to a predominance of parcels less than 0.5 acre in size that do not meet the State's criteria for lower income housing suitability

Table A-35: Community Housing Capacity in Housing Units by Income Category, Ranked

Community	Community Typology	Total Capacity/ Above Moderate & Moderate Income Capacity	Total Capacity/ Above Moderate & Moderate Income Capacity Rank	Lower Income Capacity *	Lower Income Capacity Rank
Mission Valley ¹	Urban Tier 2 - Employment	28,744	1	13,309	1
Downtown	Urban Core – Coastal & Employment	21,315	2	6,205	3
Kearny Mesa ¹	Suburban Tier 1 - Employment	14,146	3	13,012	2

Community	Community Typology	Total Capacity/ Above Moderate & Moderate Income Capacity	Total Capacity/ Above Moderate & Moderate Income Capacity Rank	Lower Income Capacity *	Lower Income Capacity Rank
Uptown ^{1, 2}	Urban Tier 1	11,408	4	1,800	13
Otay Mesa ^{+, 1, 2}	Suburban Tier 2 - Employment	10,096	5	2,321	10
North Park ¹	Urban Tier 1	8,858	6	503	21
Navajo ¹	Suburban Tier 1 - Employment	8,314	7	6,122	4
Midway-Pacific Highway ¹	Urban Tier 2 - Employment	7,161	8	3,935	5
Mid-City: Eastern Area ¹	Suburban Tier 1	6,265	9	3,829	6
Encanto Neighborhoods ¹	Suburban Tier 1	5,967	10	2,766	8
Mira Mesa ²	Suburban Tier 2 - Employment	5,802	11	479	22
Mid-City: City Heights	Urban Tier 1	5,640	12	1,695	14
College Area ²	Suburban Tier 1	5,345	13	3,579	7
Clairemont Mesa ²	Suburban Tier 1	4,710	14	2,501	9
Pacific Beach ¹	Urban Tier 2 - Coastal	4,587	15	1,804	12
Linda Vista ¹	Urban Tier 2	4,401	16	2,064	11
Peninsula	Suburban Tier 1 - Coastal	3,478	17	1,064	16
Southeastern San Diego ¹	Urban Tier 2	3,243	18	1,072	15
San Ysidro ¹	Urban Tier 2	1,850	19	668	18
Barrio Logan ²	Urban Tier 2 – Coastal & Employment	1,464	20	181	26
Mid-City: Kensington – Talmadge	Urban Tier 2	1,422	21	561	20
Greater Golden Hill ¹	Urban Tier 1	1,401	22	181	27
Mid-City: Normal Heights	Urban Tier 1	1,307	23	233	25
Carmel Mountain Ranch ²	Suburban Tier 2	1,245	24	585	19

Community	Community Typology	Total Capacity/ Above Moderate & Moderate Income Capacity	Total Capacity/ Above Moderate & Moderate Income Capacity Rank	Lower Income Capacity *	Lower Income Capacity Rank
Southeastern San Diego ¹	Urban Tier 2	3,243	18	1,072	15
San Ysidro ¹	Urban Tier 2	1,850	19	668	18
Barrio Logan ²	Urban Tier 2 – Coastal & Employment	1,464	20	181	26
Mid-City: Kensington – Talmadge	Urban Tier 2	1,422	21	561	20
Greater Golden Hill ¹	Urban Tier 1	1,401	22	181	27
Mid-City: Normal Heights	Urban Tier 1	1,307	23	233	25
Carmel Mountain Ranch ²	Suburban Tier 2	1,245	24	585	19
Skyline – Paradise Hills	Suburban Tier 2	1,213	25	27	32
Ocean Beach ¹	Urban Tier 2 - Coastal	1,101	26	121	28
Rancho Penasquitos ²	Suburban Tier 2	893	27	308	24
Otay Mesa - Nestor	Urban Tier 2	873	28	66	29
Serra Mesa	Suburban Tier 1	796	29	723	17
University ²	Urban Tier 2 - Employment	749	30	405	23
Pacific Highlands Ranch ⁺	Suburban Tier 2	372	31	0	33
La Jolla	Suburban Tier 1 - Coastal	335	32	42	30
Old Town ¹	Urban Tier 2	90	33	0	34
Torrey Pines	Suburban Tier 2 - Coastal	31	34	0	35
Miramar Ranch North	Suburban Tier 2	30	35	30	31
Rancho Bernardo	Suburban Tier 2 - Employment	12	36	0	36
Rancho Encantada ⁺	Suburban Tier 2	9	37	0	37

* Potential housing units on sites meeting Government Code Section 65583.2 criteria for sites suitable for lower-income development. See “Suitability of Sites for Lower Income Housing” section below for additional information.

+ Recently developed community (former or developing greenfield land).

¹ Community Plan Update or amendment adopted or anticipated to be adopted during 5th Cycle planning period.

² Community Plan Update or amendment in process and anticipated to be adopted during 6th Cycle planning period.

LOCAL DATA AND KNOWLEDGE

During the outreach conducted for the Housing Element and other engagement with residents in underserved communities, the following concerns that relate to the adequate sites inventory were expressed.

San Diegans want:

- More housing, for rent and for purchase
- More housing in areas with good jobs and schools
- More housing in the areas they want to live in
- More housing in buildings with more housing units
- Housing that is affordable to people of all income levels
- Rent-restricted affordable housing
- Reduction of the scale of homelessness
- Increased assistance and housing for people experiencing homelessness
- More affordable senior housing
- More retirement communities
- Senior housing that is located where services are within walking distance
- More ownership housing that is within the price range of San Diegans
- More housing in single family neighborhoods
- More backyard units/ADUs
- More housing near transit
- Housing in safe neighborhoods
- Housing in neighborhoods with quality infrastructure and public facilities

San Diegans are also concerned about:

- Availability of housing
- Cost of housing
- Low-quality housing
- Sudden rent increases

- Long-term residents' ability to stay in their neighborhoods
- Eviction

OTHER RELEVANT FACTORS

The City is currently in the process of updating the community plans for the Clairemont Mesa, Mira Mesa, University, College Area, and Uptown communities, which have smaller or no areas of displacement risk and no RECAP areas. The Clairemont Mesa, Mira Mesa, Uptown, and University communities are also racially/ethnically diverse and high opportunity areas. The University and College Area communities are identified as poverty concentration areas; however, these areas also have large student populations which affect poverty measures. These community plan updates, which will include rezoning of sites, will identify more opportunities for transit-supportive housing densities near existing and planned transit routes. These community plan updates are anticipated to be completed during the 6th Cycle. Further, the San Diego Association of Governments (SANDAG) is currently in the process of developing a new Regional Plan which reexamines transportation patterns and demand and reimagines the County's public transit system. Once the Regional Plan is adopted, which will occur during the 6th Cycle, the City can identify additional opportunities for transit-oriented land use and zoning changes and housing densities that will support housing for all income ranges in high opportunity areas and areas with income and racial/ethnic diversity.

CONCLUSIONS, SUMMARY OF ISSUES, AND CONTRIBUTING FACTORS

Conclusions

The adequate sites inventory has identified housing capacity for above moderate, moderate, and lower income housing throughout the city in communities that largely developed before the 1970s and in areas that are newly developing or transitioning areas from minimal development to developed. The inventory has also identified housing capacity across income levels both within and outside of minority concentration areas, poverty concentration areas, RECAPs, displacement risk areas, areas with significant existing affordable housing supplies, and high resource areas.

Issues

While the city has identified lower income housing capacity both within and outside of minority and poverty concentration areas, development of lower income housing without applying the fair housing lens and without guidance from the city could exacerbate existing conditions that concentrate lower income San Diegans and San Diegans from certain racial and ethnic groups.

While the city has identified lower income housing capacity both within and outside of high opportunity areas, development of lower income housing without applying the access to opportunity lens and without guidance from the city could exacerbate existing conditions that limit lower income San Diegans' access to opportunity. Housing capacity in high opportunity areas is more limited than housing capacity in areas with moderate to low opportunity.

Without mitigation, development in displacement risk areas can result in displacement of residents in naturally occurring affordable housing and residents of lower incomes. However, new development in displacement risk areas can bring the benefit of improving poverty and minority concentration issues even as it threatens displacement of lower income individuals and renters. The City needs to address fair housing conditions and seek ways to mitigate displacement.

Contributing Factors

The factors contributing to the fair housing conclusions and issues identified above include:

- Low incomes for many San Diegans, and disproportionately for Black, Latino, Native American, Pacific Islander, and disabled individuals
- Limited housing supply
- Demand for housing that increases housing costs to levels many San Diegans are not able to afford
- Suburban development patterns with large areas of low-density and single-family housing near large employment centers and areas of high opportunity that limit housing supply and therefore access to employment and opportunity areas
- Limited transit service in and connecting to high opportunity areas due to low density land uses
- Limited financial resources to subsidize affordable housing development

FAIR HOUSING ENFORCEMENT AND OUTREACH CAPACITY

The City of San Diego intends to further fair housing efforts by promoting fair and equal housing opportunities for its residents. Fair housing enforcement and outreach is part of making community members aware of fair housing laws and rights and addressing compliance with fair housing laws. While the City of San Diego leads and coordinates many of the activities that support efforts related to fair housing, City leaders and staff also work collaboratively with other jurisdictions, community organizations, and stakeholders when addressing and reporting:

- Fair housing enforcement and housing outreach capacity;
- Findings, lawsuits, enforcement actions, settlements, or judgments related to fair housing or civil rights;
- Compliance with existing fair housing laws and regulations; and
- Conclusion and findings.

PATTERNS AND TRENDS

Local Enforcement Activities and Outreach Capacity

The City of San Diego has dedicated staff who oversee local fair housing programs and service contracts, housing policy updates, and compliance with reporting procedures. The Economic Development Department is the City's lead for the regional Analysis of Impediments to Fair Housing Choice (commonly known as an "AI"). The Economic Development Department's Community Development Block Grant (CDBG) program webpage includes information on fair housing.¹ This site provides information and resources related to fair housing laws and rights, training events and links to service providers. For regional initiatives, the Economic Development Department works collaboratively with agencies and organizations who have the expertise and capacity to further fair housing and provide outreach to residents.

The Planning Department is the lead on the General Plan Housing Element update, housing policy and zoning updates, as well as annual reporting on housing production targets. In 2018 a dedicated Housing, Implementation and Policy Team was assigned to create long-term policies, programs, and incentives to address a shortage of affordable housing. The Planning Department's website includes a Housing Toolkit with a guide to the residential development process, a summary of relevant City development regulations, and affordable housing programs

¹ City of San Diego Economic Development Department: <https://www.sandiego.gov/cdbg/fairhousing>, accessed May 2021.

the City has to offer.² The resources, which are available in English and Spanish, include targeted materials for housing accessibility, senior housing, disabled veterans, homelessness housing, etc.

Additional agencies and organizations are active participants and partners in the efforts, programs, and service delivery. The primary activities of each organization are summarized below along with the detailed services and outreach provided by Legal Aid Society of San Diego, Inc. (LASSD), as the City of San Diego's housing provider. While most organizations respond to fair housing issues across the region, they serve residents within the City of San Diego.

- The San Diego Regional Alliance for Fair Housing (SDRAFFH) is a longstanding coalition of members of the fair housing community, government entities, enforcement agencies and housing providers. SDRAFFH conducts outreach on behalf of the City of San Diego as well as participating cities and San Diego County. SDRAFFH oversees the preparation of the region's AI, promotes training and fair housing events, and responds to experiences with housing discrimination issues and concerns.
- Center for Social Advocacy (CSA) San Diego County is a nonprofit focused on programs and advocacy for the eradication of housing discrimination and fair housing for all individuals. This organization is a U.S. Department of Housing and Urban Development (HUD) Approved Housing Counseling nonprofit agency that works on enforcement, outreach and education, and ensuring equal housing opportunities for protected classes.
- South Bay Community Services is a community-based nonprofit organization with a staff who provide a range of services for children, youth, and families in San Diego county, including the City of San Diego. Some of these services including housing support and rental assistance.
- LASSD is a non-profit that provides fair housing services including training and legal assistance for people with fair housing complaints and issues.

LASSD ensures an adequate level of service is available to all residents in the city and provides the following services: Community Outreach and Education; Investigation and Enforcement; Fair Housing Policy Development; and Documentation, Performance Reports and Monitoring. LASSD's end of the year reports summarize the city-wide fair housing program and housing discrimination issues in the City of San Diego. The work performed by LASSD, as the City's fair housing provider, is need-based which means that the number of calls related to housing discrimination varies from year to year. However, as part of the scope of work certain metrics are defined as detailed below:

- A minimum of two presentations or workshops on fair housing rights to home seekers, home buyers, and tenants.

² City of San Diego Planning Department: <https://www.sandiego.gov/planning/programs/housing/toolkit>, accessed May 2021.

- Power Point presentations provided to the City for posting on the City's website for public access.
- Outreach to segments of the population likely to encounter housing discrimination through the distribution of at least (6) six articles in print and web-based media educating the community on what unlawful housing discrimination is and how to report it.
- Free fair housing training for property managers and landlords in English and Spanish using an updated training manual approved by the City.
- At least one fair housing training for nonprofit agencies within the City of San Diego who apply for and/or receive CDBG funding.

Based on a review of year-end reports for 2018 through 2020 in the City of San Diego Grants Management System, LASSD exceeded their contracted services agreement by holding at least 30 training events per year for housing consumers, housing providers and community groups about the new local fair housing protection directed or promoted specifically to residents within the City of San Diego. While some data is tracked and disclosed—such as the number of trainings offered and total participants in attendance at outreach events—the residential address of participants and the location of complaints, cases and other outreach and enforcement services is not reported by census tract or zip code. However, from reporting by LASSD, as well as the input obtained through the AI, patterns and trends emerged to inform the response to fair housing as well as the policies and programs in the City's Housing Element.

Fair Housing Testing

Several service areas related to outreach overlap with important enforcement measures. For example, LASSD has established a Fair Housing Hotline that is posted and publicized by LASSD and the City of San Diego to encourage the prompt reporting and enforcement for housing discrimination. While this is the City's most accessible method for residents to address compliance with fair housing laws such as investigating complaints, additional auditing and reporting supplements this method.

LASSD conducts random, paired fair housing rental tests, and complaint-based tests as needed. The tests assist LASSD in identifying issues, trends, and problem properties within the City. At approximately 1.4 million people, the City of San Diego has the largest population of all local jurisdictions in the region and the highest number of audit tests conducted. As listed in the AI, a total of 134 audit tests conducted for the City of San Diego between FY 2016 and FY 2020 tested the following conditions: disability (reasonable accommodation and reasonable modification), familial status, national origin, race, and religion.³ Other jurisdictions with a population over 100,000 (Carlsbad, Chula Vista, El Cajon, Escondido, Oceanside, and Vista) conducted between 8 and 47 audits during this same time period; however, no other jurisdiction reported audit tests conducted for every year during this period.

³ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, p188.

The AI summarized these results for the region and indicated that between 7 and 63 percent of the tests resulted in disparate treatment.⁴ The majority of large jurisdictions list reasonable accommodations as a factor in the disparate treatment. For the City of San Diego, the LASSD reported that 18 of the tests, or 34 percent, resulted in disparate treatment. In the tests where disparate treatment was shown, 12 related to reasonable accommodations.⁵ The remainder were related to unequal treatment due to familial status and 3 due to national origin.

In addition to the findings on discrimination, LASSD conducted tests in 2020 based on the protected class of Source of Income. In two tests (13 percent) showed differential treatment of a rental subsidy holder when the protected tester was given a different monthly rent amount and management did not follow-up with the protected tester.⁶

In the prior year, 2019, LASSD conducted testing based on the protected class of National Origin and Disability protection. During the test for disability protection, testers asked for a reasonable accommodation to the housing provider's pet policy and requested an emotional support animal. In the results for these two fair housing tests, differential treatment on the basis of national origin occurred in less than one percent of tests while 15 percent of the test resulted in a finding of differential treatment meaning the housing provider denied the tester the reasonable accommodation request for their emotional support animal.⁷

LASSD also conducted trainings targeted to protected classes and reached a total of 470 people in specific protected categories alone.⁸ This number did not include attendees in protected classes at general fair housing presentations. Because of the targeted outreach, LASSD reported an increase in the volume of fair housing calls placed to LASSD. Examples of the trainings and protected classes targeted include:

- Source of Income: San Diego Housing Commission
- Disability: The Meeting Place, The Center for the Blind, Friendship Clubhouse, Street Links
- National Origin/Ancstry, Race, Color: International Rescue Committee, Criminal Re-entry roundtable

Fair Housing Complaints

In the year-end reporting for the City of San Diego, LASSD provided a summary of emerging trends in housing discrimination. The programmatic reports for the last three years were reviewed. Based on the meritorious fair housing complaints received for FY 2018, LASSD reported

⁴ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, Table 80, p187-188.

⁵ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, p183.

⁶ Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2019-2020 # 10056902-15-V Year End Programmatic Report, p1.

⁷ Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2019 # 10056902-15-V Year End Programmatic Report, p1.

⁸ Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2019-2020 # 10056902-15-V Year End Programmatic Report, p5.

a continuing trend showing that persons with disabilities face discriminatory conduct by housing providers that equate to a violation of their housing civil rights. Of the 166 fair housing complaints processed, LASSD received 56 complaints on disability (34 percent).⁹ LASSD provided these conclusions:

- Discrimination against persons with disabilities increased concerning discrimination involving assistive animals.
- Reasonable accommodations of a closer parking spot due to a disability were a continuing issue.
- Often, housing providers would deny the reasonable accommodation and not allow the assistive animal, or place unlawful verification information such as certified letters or notarized letters from veterinarians.

Otherwise, the most often reported allegations of housing discrimination continue to be problems in the “protected class” categories of race, national origin, and familial status (including domestic violence).

The year-end reporting for 2019 had similar conclusions. According to LASSD, the majority of complaints involved housing discrimination against persons with disabilities. LASSD received 229 complaints, more complaints than the previous year, and a total of 99 allegations of discrimination were based on disability (43 percent).¹⁰ The second most reported type of housing discrimination in San Diego was on the basis of race. The third most reported type of housing discrimination was based on source of income. The fourth most reported allegation of housing discrimination was based on national origin. Tied for fifth and sixth was discrimination based on sex and familial status.

For the most recent year, the majority of complaints received by LASSD also involved housing discrimination against persons with disabilities. Of the total 242 housing discrimination complaints received for 2020, 161 (66 percent) were related to discrimination based on disability.¹¹ The second most reported type of housing discrimination in San Diego was source of income. The third most reported type of housing discrimination was based on race. Source of income and race switched places from the prior year. The fourth most reported allegation of housing discrimination was based on gender/sex. The fifth most reported allegation of housing discrimination was national origin. Tied for sixth was discrimination based on age and familial status. The seventh most reported allegation of housing discrimination was religion and eighth was sexual orientation.

⁹ Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2018 # 10056902-15-V Year End Programmatic Report, p5.

¹⁰ Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2019 # 10056902-15-V Year End Programmatic Report, p5.

¹¹ Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2019-2020 # 10056902-15-V Year End Programmatic Report, p3.

Summary of Settlements and Judgments Related to Fair Housing

HUD maintains a record of all housing discrimination complaints filed in local jurisdictions. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. The California Department of Housing and Community Development (HCD) also provides data for each County and census tracts, when available, through the Affirmatively Furthering Fair Housing Data and Mapping Resources. Data compiled by HUD's Office of Fair Housing and Equal Opportunity (FHEO) and provided to the state database shows 36 cases for the City of San Diego.¹² Of this dataset, approximately 60 percent, or 22 cases, are related to a disability bias. This is the same pattern reported by the claims filed locally with LASSD for the City as discussed below.

Included in the annual reporting to the City of San Diego by LASSD are any legal actions related to fair housing. A review of the City's Fair Housing Action Plan/Report in its annual Consolidated Annual Performance and Evaluation Report (CAPER) submitted to HUD for the years 2018 through 2020 showed that while most of the services are not fair housing related, there are housing discrimination complaints that are received and require investigation.¹³ While cases investigated are not necessarily completed or resolved in the same year and there may be carry over of investigations into the next year, the CAPER reports indicate that generally more than half of all cases are resolved through the reporting process and assistance of LASSD.

Table A-36: Housing Discrimination Complaints 2018-2020¹⁴			
Total Number	2018	2019	2020
Unduplicated Housing Discrimination Complaints Received	166	229	242
Fair Housing Intakes Assisted By Referral to internal or external resource (non-Fair Housing referrals)	2,760	2,905	4,093
Unduplicated Investigations Implemented	156	225	242
Unduplicated Investigations Resolved	119	113	280

According to the summary prepared for the AI, 414 fair housing cases in San Diego County were filed with HUD over the most recent five-year reporting period from 2014 to 2019.¹⁵ Half of all complaints filed (50 percent or 206 cases) were deemed to have no cause and another 28 percent

¹² HCD Affirmatively Furthering Fair Housing Data and Mapping Resources, "FHEO Cases _ Total _2020_ dataset" is a list of all the Title VIII fair housing cases filed by FHEO from 01/01/2006 - 06/30/2020, accessed May 2021.

¹³ City of San Diego Economic Development Grants Management System Consolidated Annual Performance and Evaluation Report (CAPER) for 2018-2020.

¹⁴ City of San Diego Economic Development Grants Management System Consolidated Annual Performance and Evaluation Report (CAPER) for 2018-2020.

¹⁵ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, Table 81, p191.

(115 cases) were conciliated or settled. Disability-related discrimination comprised 53 percent of all cases.

The City of San Diego has approximately 42 percent of the region's population. Of the total complaints filed for the region, 183 complaints filed, about 44 percent, were from residents of the City of San Diego.¹⁶ Of the total cases in the City of San Diego, the majority (55 percent or 101 cases) were deemed to have no cause and 26 percent (47 cases) were conciliated or settled. The City of San Diego reports indicate that 122 cases were disability related (67 percent). This is a higher percentage of cases that are disability-related compared to the region as a whole.

In addition to looking at the total number of cases and the basis of discrimination, the AI also reports on the number and type of closing of those cases. The summary of closing categories for HUD cases from the AI is replicated below to show that the majority of cases in the City of San Diego (101 cases or 55 percent) had a no cause determination.¹⁷ The next highest closing category of housing cases filed with HUD (47 cases or 26 percent) were settled.

Table 82: Closing Categories for Fair Housing Cases filed with HUD (FY 2014-2018)*

	Dismissed for Lack of Jurisdiction	Unable to Locate Complainant	Compliant Failed to Cooperate	No Cause Determination	FHAP Judicial Consent Order	Complaint Withdrawn by Complainant Without Resolution	Complaint Withdrawn by Complainant After Resolution	Conciliation / Settlement successful	N/A	# of Cases	%
Carlsbad	0	0	0	5			2	6	1	14	3.4%
Chula Vista	0	0	0	11	1	1	4	11	1	29	7.0%
Coronado	0	0	0	1	0	0	0	1	0	2	0.5%
Del Mar	0	0	0	0	0	0	0	2	0	2	0.5%
El Cajon	0	0	0	12	0	0	3	6	4	25	6.0%
Encinitas	0	0	0	2	0	0	2	1	0	5	1.2%
Escondido	0	0	0	7	0	1	0	5	0	13	3.1%
Imperial Beach	0	0	0	4	0	1	0	1	1	7	1.7%
La Mesa	0	0	0	5	0	1	0	3	0	9	2.2%
Lemon Grove	0	0	0	1	0	0	1	0	1	3	0.7%
National City	0	0	0	6	0	0	2	3	0	11	2.7%
Oceanside	1	0	0	22	4	5	3	12	0	47	11.4%
Poway	0	0	0	3	0	0	1	0	0	4	1.0%
San Diego	5	0	4	101	0	4	8	47	14	183	44.2%
San Marcos	0	0	0	4	0	1	0	3	1	9	2.2%
Santee	0	0	0	4	0	0	1	3	1	9	2.2%
Solana Beach	0	0	0	3	0	0	0	1		4	1.0%
Vista	0	0	0	4	0	0	3	1	2	10	2.4%
Unincorporated	3	1	0	11	0	1	3	9	0	28	6.8%
Total County	9	1	4	206	5	15	33	115	26	414	100.0%
%	2.2%	0.2%	1.0%	49.8%	1.2%	3.6%	8.0%	27.8%	6.3%	100.0%	

Source: U.S. Department of Housing and Urban Development, February 2020. * Data represents HUD's fiscal years (October 1-September 30)

Recent HUD enforcement actions related to fair housing cases were also reviewed. Documents issued by HUD for 2020 Fair Housing Act Charges and 2020-2019 Conciliation Agreements

¹⁶ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, p191.

¹⁷ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, Table 82, p192.

included several disability-related discrimination cases and allegations of discriminatory redlining in several southern California counties, including San Diego¹⁸:

- Conciliation Agreement/Voluntary Compliance Agreement filed in October 2019 under Title VIII of the Civil Rights Act of 1968 Section 504 of the Rehabilitation Act of 1973 Americans With Disability Act (HUD Case Numbers: 09-20-8488-8, 09-20-8488-4, 09-20-8488-D).
- Title VIII Conciliation Agreement filed in May 2019 under HUD Case Name: Inland Fair Housing and Mediation Board v Pacific Diversified No. 4 LLC, et. al. (HUD Case Numbers: 09-19-6700-8).
- Conciliation Agreement in July 2019 between California Reinvestment Coalition and CIT Group, Inc., and CIT Bank, N.A. dba OneWest Bank (Respondent) under Title VIII of the Civil Rights Act of 1968, as amended (Fair Housing Act) (FHEO Case Number: 09-17-7199-8).

HCD also has a role in enforcing state housing laws and may get involved with monitoring or providing letters that involve a potential violation of a jurisdiction's housing element; however, HCD did not issues letters to the City of San Diego in 2018-2019.¹⁹

In reviewing the Department of Justice housing enforcement case records for the City of San Diego, there was one case filed with the California Southern District.²⁰ On June 11, 2019, the United States filed a complaint in *United States v. Nelson* (S.D. Cal.), alleging a pattern or practice of sexual harassment in violation of the Fair Housing Act against an owner/manager.²¹

In reviewing the letters of findings issued and lawsuits filed by the State of California Department of Justice, Office of the Attorney General from 2018-2020, there were no reports pertaining to housing rights enforcement for the City of San Diego.²² There also did not appear to be reports of complaints or cause determinations from DFEH against the City of San Diego or San Diego County.²³ In a search on the DFEH website, there were notices of settlements for cases within the city of San Diego:

¹⁸ HUD Fair Housing Enforcement Activity, "Documents Issued by HUD in Fair Housing Cases," https://www.hud.gov/program_offices/fair_housing_equal_opp/enforcement, accessed May 2021.

¹⁹ HCD Accountability and Enforcement, "Enforcement Letters Issued," updated: 05/18/2021, <https://www.hcd.ca.gov/community-development/accountability-enforcement.shtml>, accessed May 2021.

²⁰ U.S. Department of Justice Civil Rights Division, "Housing and Civil Enforcement Cases," <https://www.justice.gov/crt/housing-and-civil-enforcement-cases>, accessed May 2021.

²¹ U.S. Department of Justice. "Justice Department Files Sexual Harassment Lawsuit Against Owner and Manager of Rental Properties in San Diego, California, Area," <https://www.justice.gov/opa/pr/justice-department-files-sexual-harassment-lawsuit-against-owner-and-manager-rental>, June 11, 2019.

²² California HCD, "Accountability and Enforcement," <https://www.hcd.ca.gov/community-development/accountability-enforcement.shtml>, accessed May 2021.

²³ California Department of Fair Employment and Housing (DFEH), "Legal Records and Reports," <https://www.dfeh.ca.gov/legalrecords/#reportsBody>, accessed on May 2021.

- In response to a civil complaint filed in February 2017, DFEH released a statement in 2020 that a settlement against a San Diego homeowners association, two members of its board, and a former property management company was reached after DFEH found cause to believe a violation occurred against the Fair Employment and Housing Act based on board members' retaliation against a homeowner.²⁴
- DFEH also released news of a settlement based on a claim filed in April 2017 for housing discrimination and violations of the Unruh Civil Rights Act alleging that a property management company discriminated on the basis of a disability when they rejected an application without addressing the reasonable accommodation request.²⁵
- Another case in San Diego was settled in 2018 by DFEH based on a complaint filed after a potential tenant was offered a lease for a home in San Diego, and was then told both he and his partner had to individually satisfy a yearly income standard because they were not married. DFEH found cause to believe a violation of the Fair Employment and Housing Act and Unruh Civil Rights Act had occurred since the landlord applied discriminatory income standards to deny housing to qualified applicants.²⁶
- DFEH also settled a case in 2018 on behalf of a prospective tenant denied an apartment because she has a disability. DFEH found cause to believe a violation of the Fair Employment and Housing Act had occurred when the property manager rescinded the approval after seeing the tenant used a wheelchair.²⁷
- DFEH filed a civil complaint in San Diego Superior Court in October 2016 in response to a homeowners association failing to provide reasonable accommodations for a tenant's disability. The case, which DFEH settled, was based on a violation of the Fair Employment and Housing Act when the elevator became inoperable and a tenant was unable to leave his third-floor apartment for almost three months.²⁸
- DFEH settled a religious discrimination case after a complaint for was filed in June 2019 against a homeowners association and its management who refused to allow

²⁴ California Department of Fair Employment and Housing (DFEH), "San Diego Homeowners Association, Board Members and Property Management Co. to pay \$120,000 to Settle Housing Retaliation Case," https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/06/Venetian_PR.pdf, June 15, 2020, accessed May 2021.

²⁵ California Department of Fair Employment and Housing (DFEH), "DFEH Settles Housing Discrimination Case Against San Diego Property Manager," <https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2018/08/KandR-PR20180808.pdf>, August 8, 2018, accessed May 2021.

²⁶ California Department of Fair Employment and Housing (DFEH), "DFEH Settles Marital Status Housing Discrimination Case Against San Diego Property Owner and Manager," <https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2018/07/DFEHvSarsfield-PR.pdf>, July 17, 2018, accessed May 2021.

²⁷ California Department of Fair Employment and Housing (DFEH), "DFEH Settles Disability Discrimination Case Against San Diego Senior Housing Complex," https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2018/12/Oak-Terrace_PR20181217.pdf, December 17, 2018, accessed May 2021.

²⁸ California Department of Fair Employment and Housing (DFEH), "DFEH Settles Housing Discrimination Case Against San Diego Homeowner's Association," <https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2018/04/CasadeAlvarado-PR20180409.pdf>, April 9, 2018, accessed May 2021.

complainant to post a mezuzah on her front doorpost. The management's enforcement of the HOA's Covenants, Conditions and Restrictions was found to make housing unavailable for many observant Jews was housing discrimination and a violation of the Unruh Civil Rights Act.²⁹

As part of the settlement for most of these cases, the property owners and managers agreed to develop fair housing policies, including updating antidiscrimination policies and adding policies for reasonably accommodating applicants and tenants with disabilities, post fair housing posters, and attend annual fair housing training.

The City of San Diego and SDHC are involved with a case regarding the City's Section 8 voucher program: Choice Communities Program for Section 8 Housing Choice Voucher Holders. The lawsuit proceeding through the court system is San Diego Superior Court Case 2019-12582. The plaintiffs are the San Diego Branch of the NAACP, San Diego Tenants Union, and Darlisa McDowell. The issue that prompted the lawsuit was a resident using the City's voucher program would require extra assistance for rental costs in a neighborhood of her choice where housing costs are higher.³⁰ The City's local voucher levels may be below market rents for those neighborhoods. In addition, there is a claim that the City's allowance is less than what would be available through a federal program. The concern is by not providing families who have Section 8 vouchers with a higher allocation to use their vouchers outside lower income areas, the use of vouchers may be concentrated in racially-segregated areas of the City.

LOCAL DATA AND KNOWLEDGE

Community Outreach and Issue Identification

Fair Housing issues are complex, which requires the City of San Diego to employ a variety of methods to both connect with people who may experience discrimination when looking for housing and grow community knowledge on what common practices are illegal in landlord/tenant interactions. The use of both on-going and seasonal outreach helps the City of San Diego to keep a pulse on issues within the community as well identify trends and new issues as they arise. Information gathered through various methods such as workshops, surveys, public trainings, and reporting procedures provided important local data that informed the policies included in the Housing Element.

Through a service agreement, the LASSD provides ongoing Fair Housing ongoing outreach and education services related to Fair Housing on behalf of the City of San Diego. This work included group trainings on housing discrimination and fair housing rights. Since 2015 LASSD has provided the following services. A summary of the City's Public Information, Education, and Outreach from 2020 are listed below as an example of the annual outreach activities. In addition, LASSD counsels

²⁹ California Department of Fair Employment and Housing (DFEH), "DFEH Settles Religious Discrimination Case Against San Diego County Homeowners Association," <https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2019/12/TreoReligiousDiscrimination20191217.pdf>, December 17, 2019, accessed May 2021.

³⁰ "San Diego Housing Commission Sued Over Housing Voucher Program," Claire Trageser, KPBS. <https://www.kpbs.org/news/2019/mar/18/san-diego-housing-commission-sued-over-housing-vou/>. March 18, 2019.

individuals to identify if they have been a victim of discrimination and provides case management for qualified individuals.

Table A-37: Public Information, Education, and Outreach³¹	
Outreach Event	Total Participants
Presentations or Workshops Conducted for Home Seekers, Homebuyers, and Tenants on Fair Housing Rights	24
Attendees Educated at Workshops Conducted for Home Seekers, Homebuyers, and Tenants on Fair Housing Rights	337
Fair Housing Brochures Distributed Throughout the City Limits	3,187
Attendees Educated at Outreach and Educational Workshops Conducted for Unduplicated Groups	548
Public/Community Events Attended	14
<i>All Activities</i>	<i>4,110</i>

To collect input on issues related to Fair Housing, the City of San Diego also leveraged two community outreach programs that are tied to cycles of programs administered by the HCD and HUD. The first was input collected as part of the overall outreach program for the Housing Element. The second was the focused effort on the AI. Both community outreach efforts relied on in-person workshops and on-line surveys. The following sections detail the information gathering process and key information gleaned from both processes.

Housing Element

In development of the Housing Element, the City of San Diego sought the input of individuals throughout the city to identify housing challenges and solicit input on possible solutions. Over 600 people took advantage of the in-person and online opportunities.

Five public workshops were held in September and October 2019 in locations throughout the city:

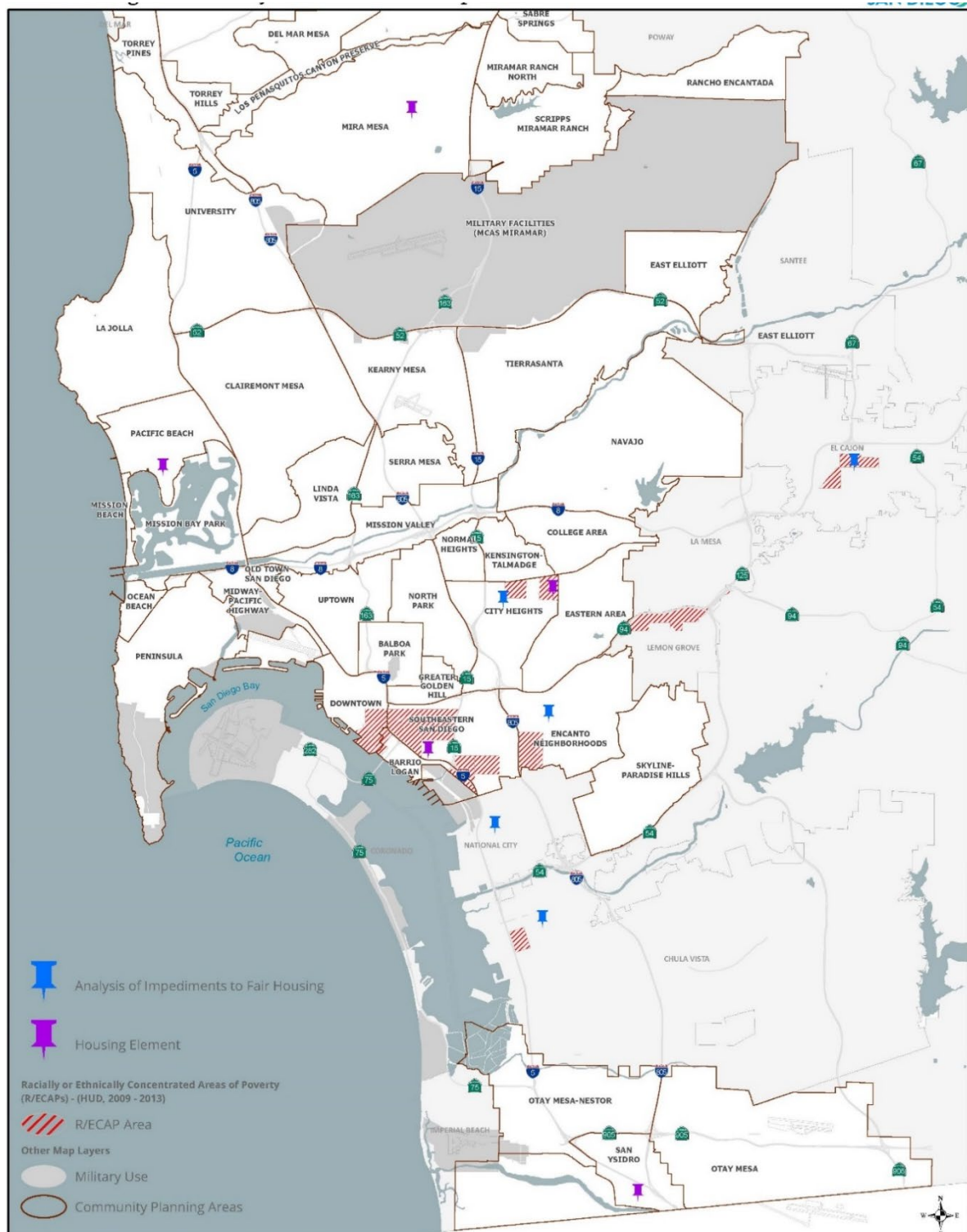
- South: Cesar Chavez Community Center in San Ysidro
- East: Dolores Magdaleno Memorial Recreation Center in Southeastern San Diego
- North: Mira Mesa Recreation Center in Mira Mesa
- Mid-City: Colina Del Sol Recreation Center in City Heights
- West: Crown Point Elementary School Auditorium in Pacific Beach

The locations were selected to cover both the geographic extent of the city as well as to attempt to collect input from the areas most likely to experience housing discrimination. The workshops held in Southeastern San Diego and City Heights were in close proximity to areas of the city

³¹ City of San Diego Economic Development Grants Management System Consolidated Annual Performance and Evaluation Report (CAPER) for 2018-2020.

identified as Racially or Ethnically Concentrated Areas of Poverty (see Figure A-107). The combined number of workshop participants for all locations was 163.

Figure A-107: Fair Housing Community Outreach Workshop Locations



Although the workshops focused on all subject areas of the Housing Element, one specific topic area allowed participants to identify if housing discrimination is a problem with the following prompt:

Many San Diegans face one or more barriers to finding quality housing. What do you believe is the most pressing issue to finding quality housing in San Diego?

In addition to the in-person community workshop, an online survey was used. The number of responders to the survey was 464. The same question related to identifying barriers to housing was included as a question of the online survey. Of the 163 workshop participants, 5 individuals (4 percent) selected Discrimination (e.g., based on race, family status, disability) as the most pressing issue. Of the online responders 28 individuals (6 percent) selected Discrimination (e.g., based on race, family status, disability) as the most pressing issue.

In addition to the selection in the closed-selection instrument, comment card and open-ended questions were used in the in-person and online engagement respectively. Of the hundreds of responses received, five individuals made comments related to discrimination, and two of those related to discrimination specifically related to Section 8 vouchers.

The engagement activities for the Housing Element also included attendance at community events in City Heights (Transit and Tacos event) and Encanto (Clean Air Day at First Saturdays); meetings with the HEAL group of persons experiencing or having experienced homelessness; a meeting All of Us or None, an organization advocating for individuals formerly involved in the justice system; and meetings with affordable and market rate housing developers and operators.

A number of the ideas expressed at the community-based outreach interviews were in response to the increase and extent of homelessness in San Diego. Participants also shared information on the struggles they have found when seeking housing. Specifically, there is currently a wave of people who have been evicted, which is causing congestion at the County General Relief Office. Others noted that the exclusion of people on certain lists from public and affordable housing, such as those with a criminal record or drug use, leaves few options for those individuals. It was identified that individuals experiencing homelessness can have post-traumatic stress disorder (PTSD) that makes entry into shelter or housing difficult. Finally, some shared that there is a rapidly growing population of seniors experiencing homelessness and many of them are lonely. The participants also identified there is a need for better coordination and consolidation of existing outreach efforts, along with a need to use counselors for homeless outreach instead of police officers.

Other ideas presented were based on real-life experiences and challenges. For example, participants expressed that the City should consider more City-owned land for affordable housing. In response to housing programs, participants stated housing voucher holders are not allowed to use more than one voucher for a unit, so there are few opportunities to get a larger space with multiple roommates. Creative and group living ideas were encouraged by participants, such as a home sharing program, “pod housing,” and co-living options that have common spaces. Some stated that even when there are shelter, transitional, and permanent supportive housing

opportunities, there is a need for outreach and community introductions after residents move to new facilities. When outreach is conducted after-the-fact, locals can see that their new neighbors are not disruptive.

Analysis of Impediments to Fair Housing Choice

Every five years, the City of San Diego in its partnership with San Diego Regional Alliance for Fair Housing (SDRAFFH) undertakes an extensive outreach program to assess issues with fair housing locally and develops an action plan to address these issues. This information is collected for the preparation of the AI, which is prepared every five years to meet the requirements of HUD.

The SDRAFFH is comprised of representatives from the 18 cities in the San Diego region and the County of San Diego. Together with Fair Housing professionals and housing advocates, the SDRAFFH conducted a comprehensive outreach process throughout San Diego County to identify barriers to Fair Housing choice, as well as strategies to address those challenges. Over 1,204 community members and service providers provided input through the online questionnaire, stakeholder interviews, and community workshops.

Overall, the goal of the AI outreach program was to educate and engage key stakeholders and the public related to the AI process and outcomes. To do so, the outreach goals included:

- Develop an inclusive and expansive database of key stakeholders and interested parties to involve in the process.
- Create and communicate clear, consistent and understandable explanations and messages about the purpose, process, and desired outcomes for the SDRAFFH and AI.
- Engage key stakeholders and interest groups early in the process to:
 - Build interest in, commitment to and trust in the process.
 - Develop initial understandings of effectiveness of existing Fair Housing programs and services.
 - Identify issue areas or gaps in service, opportunities and constraints across the region and within specific communities; and
 - Extend outreach through their networks to hard-to-reach stakeholders.
- Apply a diverse outreach toolkit of targeted communications and public participation activities that meet stakeholders' varying needs and ways of accessing information, and that best inform the technical process.
- Identify stakeholders' needs and priorities for Fair Housing at the local and regional levels to effectively inform the AI.

The SDRAFFH sought to engage a broad range of community members and geographies across the County. In particular, the outreach program emphasized targeted engagement of "hard-to-

reach” populations such as seniors, youth, people with disabilities, limited-English proficient communities, and low- and moderate-income residents. These traditionally under-represented groups are typically more vulnerable to housing discrimination.

Six community workshops were held in communities throughout the County in October and November 2019 to inform community members about fair housing issues, to gather input on housing needs, barriers, and priorities. Community workshops were publicized using multi-lingual flyers, e-blasts, websites updates, direct emails, and news and social media.

The interactive workshop format included brief presentations to describe fair housing and protected classes, as well as a description of the AI purpose and development process. Next, workshop attendees participated in a large group discussion regarding fair housing barriers and issues facing protected classes in San Diego County. Bilingual interpreters and staff assisted with workshop facilitation in areas that were likely to attract Spanish and Arabic speaking residents.

Approximately 63 individuals attended the community workshops. The locations of the meetings were as follows:

- LISC San Diego City Heights Center, San Diego
- Valencia Park/Malcolm X Library, San Diego
- Police Department Community Room, El Cajon
- City Hall, Escondido
- City Hall, Chula Vista
- MLK Jr. Community Center, National City

Five of the six locations were located in close proximity or within the areas identified as Racially or Ethnically Concentrated Areas of Poverty (see Figure A-107 above).

In addition to community workshops, and online survey collected input from residents and stakeholders on Fair Housing and discrimination in October 2019. The survey remained open for approximately six months until February 2020, collecting a total of 1,132 responses as follows:

Table A-38: Fair Housing Survey Responses	
Language	Responses
English	1,089
Spanish	35
Arabic	3
Vietnamese	3
Tagalog	2
Chinese	0
Total	1,132

In November and December 2019, the project consultant team conducted interviews with key housing and community stakeholders to gather their insights into housing barriers, housing discrimination and fair housing priorities in San Diego County. A representative from each of the following nine organizations participated in a telephone interview: Alliance for Regional Solutions, CSA San Diego, Elder Help San Diego, La Maestra Community Health Centers, Legal Aid Society of San Diego County, National Alliance on Mental Illness, Regional Task Force on the Homeless, San Diego Housing Federation and Southern California Rental Housing Association.

The information collected as part of the community outreach efforts was used to help inform the policies within the Housing Element related to fair housing. The key findings from the comprehensive public outreach and engagement process and the programs from the Housing Element in response to the input are summarized below.

Table A-39: Housing Element Programs Summary	
Findings	Programs
Frequent targets of discrimination include seniors, people with physical and/or mental disabilities, families with children, Section 8 recipients, undocumented immigrants, and non-native English speakers.	Objective S: Make Information More Easily Accessible – Program: Affordable Housing Resource Guide, and Proposed program: Publicize Fair Housing challenges, programs, and solutions.
The inadequate supply of housing in San Diego County impacts low-income households, large families, and households of color.	Objective I: Promote A Diversity Of Housing Available To All Income Groups Across All Communities – Program: Choice Communities Program for Section 8 Housing Choice Voucher Holders
Underreporting of discrimination occurs due to fear of retaliation, harassment, or deportation.	Objective E: Support Programs Aimed At Housing Vulnerable And Special Needs Populations – Proposed program: Coordinate with non-profit partners to provide services to vulnerable populations.
Finding and accessing information about what housing is available, services, programs, and Fair Housing laws and regulations can be difficult and confusing.	Objective S: Make Information More Easily Accessible – Proposed program: Publicize Fair Housing challenges, programs, and solutions.
Language barriers, different dialects, and cultural differences can present challenges to building community awareness about Fair Housing.	Objective S: Make Information More Easily Accessible – Program: Equity-Specific Outreach and Language Access Plan.
There are often misconceptions and misunderstandings about application requirements, reasonable accommodation requests, and the complex Fair Housing laws and terminology.	Objective S: Make Information More Easily Accessible – Proposed program: Publicize Fair Housing challenges, programs, and solutions.
Community leaders and representatives should be utilized to disseminate information and resources on Fair Housing issues, rights,	Objective S: Make Information More Easily Accessible – Proposed program: Build networks and relationships with local organizations

and services.	
The SDRAFFH and service providers should go directly to the community and share information at community events, libraries, community centers, churches, swap meets, schools, transit centers, and other places where people congregate, particularly those people with the greatest needs.	Objective S: Make Information More Easily Accessible – Proposed program: Build networks and relationships with local organizations and Offer more offline engagement opportunities.

Case Studies

The year-end reporting from LASSD provides a sample of case studies that exemplify the observed and emerging trends. The reports of discrimination show the scenarios and discrimination experienced by residents that lead them to seek out fair housing assistance. Below are five fair housing client contacts from 2019 and 2020 that warranted reasonable accommodations to be provided, and in two cases, fair housing complaints to be filed on behalf of the residents.

- Client's son was her caregiver to assist her with tasks because of her disability. Management told Client that her son was no longer able to come to the property. Client contacted LASSD and LASSD was able to conciliate the **reasonable accommodation** request for her son to continue to be her caregiver. Management agreed and allowed her son to visit the property.³²
- Client contacted LASSD because she received a termination notice with the stated reason of renovations. Client asked for a **reasonable accommodation** request to rescind the notice and stay in the unit. The request also asked to delay the renovations due to her disability and the risk of the pandemic. LASSD was able to conciliate the reasonable accommodation and the housing provider agreed to rescind the notice and delay the renovations.³³
- Client was looking for housing last year and came across a post on Craigslist that mentioned a unit available for rent. The advertisement stated that the rent was \$1400. When the client applied, she was quoted \$1400 but when the housing provider found out that her minor son would be moving in with her, he demanded she pay an additional \$200. An investigation was initiated and at its conclusion a **DFEH complaint will be filed**.³⁴

³² Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2019-2020 # 10056902-15-V Year End Programmatic Report, p2.

³³ Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2019-2020 # 10056902-15-V Year End Programmatic Report, p2.

³⁴ Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2019 # 10056902-15-V Year End Programmatic Report, p1.

- Client lives in a low-income senior building. Prior to reaching out to Legal Aid, he made a **reasonable modification request** for grab bars in the bathroom. The housing provider told him he'd have to hire someone and pay for the installation himself. The client was able to receive assistance from a non-profit to pay for and install the grab bars, but the housing provider refused to let the nonprofit pay for and complete the modification. Legal Aid conciliated the matter and the client's modification was approved at no cost to him.³⁵
- Client informed her housing provider that her rent was going to be late, but she had secured assistance from a local social services agency that would cover her rent. When she met with her housing provider, the provider was extremely hostile and refused to accept the rent. The housing provider made racially charged statements such as, "you people... someone else is paying your rent... I won't accept this." The housing provider also treated the client differently and ignored her when she came to the rental office with her social worker. A **HUD complaint was filed** on the client's behalf and is still pending.³⁶

OTHER RELEVANT FACTORS

Compliance with Fair Housing Laws and Regulations

The City of San Diego maintains and develops fair housing policies in response to advancements in state law and best practices. The City is assisted in this effort by various advocacy groups as well as LASSD's fair housing attorneys who develop fair housing procedures that can be implemented within the City of San Diego to ensure that housing discrimination is eliminated.

In preparing the City of San Diego Housing Element, the plan addressed a number of critical state fair housing laws and described how the City complies with those laws. Within the Housing Element is a summary of the recent state laws and the City's implementation of regulations and policies to comply and implement the changes locally.³⁷ In addition, a number of the overarching state laws and requirements are addressed through policies and other proposed activities in the Housing Element.

Table A-40: Housing Element Compliance with Fair Housing	
Requirement	Housing Element
California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2),	The Introduction to the Housing Element defines fair housing under the California Fair Employment and Housing Act and states the City's intent to further fair housing in accordance with state requirements by identifying and removing impediments and constraints. ³⁸ In addition, a key policy states HE-I.3 Take affirmative actions to further

³⁵ Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2019 # 10056902-15-V Year End Programmatic Report, p2.

³⁶ Legal Aid Society of San Diego, Inc. Fair Housing Services - Legal Services, FY 2019 # 10056902-15-V Year End Programmatic Report, p2.

³⁷ City of San Diego General Plan Housing Element 2021-2029, pHE-36-HE-37.

³⁸ City of San Diego General Plan Housing Element 2021-2029, pHE-15.

	fair housing choice in the City, and implement the solutions developed in the AI.
FEHA Regulations (California Code of Regulations (CCR), title 2, sections 12005-12271)	In summarizing and applying the information and results of the AI, the Housing Element discusses the need for the City of San Diego to prevent discrimination among the important actions, specifically to educate tenants and landlords about housing discrimination laws and challenges. ³⁹ In support of Policy HE-S.2 Develop ongoing outreach activities on Fair Housing challenges, programming, and solutions, one of the proposed activities is to publicize tenants' rights topics, like reasonable accommodation and common discrimination challenges, so more residents can report and take action on unlawful housing activities.
Government Code section 65008	The policy framework and recommended programs in the Housing Element are based on the foundation that state law requires citizens in the City of San Diego to have fair housing choice, free from discrimination based on membership in a protected class, as stated in the introduction of the Housing Element. ⁴⁰ In addition, several policies specifically support housing opportunities for individuals and communities. Several of these policies include: HE-E.8 Require that SDHC maintain a comprehensive, consolidated informational resource of units reserved for lower-income households; HE-E.11 Support the provision of an array of housing for persons with physical and developmental disabilities; and HE-I.4 Emphasize the need for affordable housing options for seniors and people with disabilities and / or special needs near transit, healthcare services, shopping areas, and other amenities.
Government Code section 8899.50	State law requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing. The San Diego Housing Commission (SDHC) operates all of the City's direct housing and housing subsidy programs. The SDHC fair housing statement is: "The San Diego Housing Commission (SDHC) is committed to affirmatively furthering fair housing by promoting fair and equal housing opportunities for individuals living in the City of San Diego. This commitment extends to all housing programs managed or owned by SDHC and to all grant-funded programs provided by SDHC. It is the policy of SDHC to provide services without regard to race, color, religion, national origin, ancestry, age, gender, familiar status or physical/mental disability." ⁴¹ The Housing Commission is an agency of the City, reports to the City Council, has its budget approved annually by the City Council. In addition, the Housing Commissioners are appointed by the City Council. In addition, for

³⁹ City of San Diego General Plan Housing Element 2021-2029, pHE-10 and HE-76.

⁴⁰ City of San Diego General Plan Housing Element 2021-2029, pHE-15.

⁴¹ San Diego Housing Commission, "Affirmatively Furthering Fair Housing Statement," <https://www.sdhc.org/affirmatively-furthering-fair-housing-statement/>, accessed May 2021.

	federal grant programs administered by the City, the Economic Development Department includes a fair housing requirement in CDBG/HUD grant contracts.
Government Code section 11135 et seq.	The City complies with the full and equal access provisions of standard state grant funding agreements.
Density Bonus Law (Gov. Code, § 65915.)	Over the past few years, the City of San Diego has amended the San Diego Municipal Code in order to bring local regulations in line with state regulations related to housing density bonuses and other streamlining measures. The Housing Element provides a breakdown of several housing-related bills signed into law in 2019 that include requirements for local density bonus programs, the Housing Element, surplus lands, ADU streamlining, and removing local barriers to housing production. ⁴²
Housing Accountability Act (Gov. Code, § 65589.5.)	The City has established objective approval requirements for the types of housing covered by the Housing Accountability Act. In addition, the Housing Element Appendix C provides a comprehensive Constraints and Zoning Analysis based on housing types covered by the Housing Accountability Act (e.g., housing development projects, emergency shelters, farmworker housing).
No-Net-Loss Law (Gov. Code, § 65863)	The goals, policies, and programs listed throughout the Housing Element are intended to help reduce barriers to and create opportunities for housing production. In accordance with State requirements, the City prepares Housing Element Annual Progress Reports after each calendar year to assess the City's progress toward its eight-year regional housing needs target (RHNA) housing production targets and toward the implementation of housing activities identified in the Housing Element. Appendix D of the Housing Element provides the City of San Diego Adequate Sites Inventory based on the housing unit target meet the RHNA target, the City, per California Government Code. Since 2008, the City has updated many of its community plans and by doing so, increased housing capacity. As described in the Housing Element, while State law requires that the City demonstrate enough housing capacity to meet RHNA targets, the City chooses to inventory all potentially developable land. ⁴³ In addition, there are sufficient properties Citywide for lower-income housing according to State requirements. In addition, Policy HE-A.9 requires the City to also look at housing production goals by Community Planning Area based on an analysis of feasible site suitability.
Least Cost Zoning Law (Gov. Code, § 65913.1)	In 2019 the SANDAG Board approved the draft methodology for the region's RHNA allocation and directed staff to submit the draft methodology to HCD. The City is compliant with this section, as demonstrated by the Adequate Sites Inventory in the 2021-2029 Housing Element which identified capacity of over 174,000 units to

⁴² City of San Diego General Plan Housing Element 2021-2029, pHE-36-HE-37.

⁴³ City of San Diego General Plan Housing Element 2021-2029, pHE-38.

	<p>meet a housing need of 108,000 housing units. The City has determined its housing capacity for the Adequate Sites Inventory through an in-depth review of all vacant and developable land. While State law requires that the City demonstrate enough housing capacity to meet RHNA targets, the City chooses to inventory all potentially developable land. This approach has been adopted in acknowledgment that many factors affect housing development feasibility, including decisions by private property owners and developers.⁴⁴</p>
Excessive subdivision standards (Gov. Code, § 65913.2.)	<p>This is a longstanding section of the state code that restricts a jurisdiction from imposing criteria that would make housing development infeasible and consider the effect of ordinances adopted and actions taken by it with respect to the housing needs. The City's code is in compliance with state law. In addition, all land use actions that go before the Planning Commission and City Council are required to provide a housing impact summary that indicates if any housing is being negatively affected by a proposed project.</p>
Limits on growth controls (Gov. Code, § 65302.8.)	<p>Housing elements in California are required to demonstrate the jurisdiction can accommodate the projected housing need and analyze the impact of any growth management controls. While the City does not have a growth control ordinance, other governmental and non-governmental constraints to housing production are acknowledged and discussed in the Housing Element.⁴⁵ In addition, Appendix C provides analysis of constraints and zoning analysis. Actions the City has taken to reduce constraints include: streamlining accessory dwelling unit, density bonus program for micro-units, allow by-right development of transitional housing facilities and permanent supportive housing in zones that allow multifamily housing.</p>
Housing Element Law (Gov. Code, § 65583, esp. subds. (c)(5), (c)(10).)	<p>As the first 6th Cycle housing element prepared in San Diego County, the City's Housing Element is among the first in the State to address several new state laws and requirements and obtained conditional state certification. The plan strives to identify more than needed housing capacity in order to facilitate compliance with the new No Net Loss requirements and provide a comprehensive set of goals, objectives, policies and proposed programs to affirmatively further fair housing opportunities and promote housing for all in San Diego. It identifies this housing capacity primarily on sites located near transit and in walkable areas, consistent with General Plan and Climate Action Plan, many of which are non-vacant. The Housing Element supports the developability of non-vacant sites with substantial data, analysis, and recent development examples.</p>

⁴⁴ City of San Diego General Plan Housing Element 2021-2029, pHE-38.

⁴⁵ City of San Diego General Plan Housing Element 2021-2029, pHE-29 and HE-30.

As discussed in the Chapter 7, Fair Housing Action Plan of the AI, various land use policies, zoning provisions, and development regulations may affect the range of housing choice available.⁴⁶ In the discussion of jurisdiction-specific impediments, recent changes to California density bonus law went into effect in January 2020, and jurisdictions must review their regulations to ensure continued compliance with state law. Most jurisdictions also need to amend the ADU provisions to comply with the recent changes to State law. At the time that the AI was released, the City of San Diego was required to update regulations related to Density Bonus, Accessory Dwelling Units, Transitional/ Supportive Housing, and Farmworker Employee Housing.

In recent years, the number and scope of housing-related legislative updates has required both procedural updates and code updates. In some cases, the legislation sets new standards and procedures for local jurisdictions to follow that may require updates to forms or process. In other cases, the Municipal Code is amended to bring the City into compliance with local regulations.

On an annual basis, the City of San Diego conducts outreach and processes requested amendments to the Land Development Code of the San Diego Municipal Code. As part of these comprehensive updates or as a separate process to meet state deadlines, the code is amended to reflect requirements and changes to state law. In 2020, the City adopted numerous amendments in response to state law, including but not limited to: Low-Barrier Navigation Centers (AB 101), Emergency Shelters (SB 2), Efficiency Units (AB 352), Density Bonus for Lower Income Student Housing (SB 1227), Incentives for ADUs (AB 68, AB 881, AB 587).

The Housing Element also provides a summary of the steps taken by the City of San Diego to reduce constraints to development since the last housing cycle, from streamlining accessory dwelling unit (i.e., granny flat or companion unit) regulations to allowing by-right development of transitional housing and permanent supportive housing in zones that allow multifamily housing.⁴⁷ In addition to the summary provided in the Housing Element, the following measures and programs support fair housing laws⁴⁸:

Access to Opportunity

- Developed programs and updated or amended regulations to allow:
 - Development of ADUs by-right, a waiver of the development impact fees associated with ADU construction, increased flexibility of the development regulations regarding ADU size and setbacks, and creation of a handbook to guide homeowners seeking to construct an ADU.
 - Ground-floor commercial spaces to be temporarily converted to housing units.

⁴⁶ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, p201.

⁴⁷ City of San Diego General Plan Housing Element 2021-2029, pHE-30-HE-31.

⁴⁸ City of San Diego General Plan Housing Element 2021-2029, pHE-38 and Appendix C.

- New mixed-use zones that open up more areas for residential-commercial mixed use throughout the City.
 - Emergency shelters by-right in approximately 90 acres of the City.
- Approved updates to the City of San Diego's Inclusionary Housing Ordinance after extensive outreach and input from stakeholders. The updated ordinance approved in 2019 applies to residential developments with 10 or more units or condominium conversions of two or more units and requires new residential and mixed-use developments to include 10 percent of the on-site rental units as affordable housing for individuals with income up to 60 percent AMI. The update to the regulations supplemented the Inclusionary Affordable Housing requirement in the northern part of the City known as the North City Future Urbanizing Area requires housing developers to dedicate 20 percent of their units to affordable buyers or renters.
- Brought forward Complete Communities Housing Solutions, an affordable housing incentive program for low and middle-income housing with investments in neighborhood amenities and the preservation of existing affordable housing units (San Diego Municipal Code Chapter 14, Article 3, Division 10).
- Completed eight Community Plan Updates (CPU) from 2015 through 2020 (San Ysidro, Golden Hill, North Park, Uptown, Old Town, Midway-Pacific Highway, Mission Valley, and Kearny Mesa), two Specific Plans (Morena Corridor and Balboa Station), and a focused amendment (Navajo) to allow for more housing, including affordable housing, in high opportunity areas near transit. The added capacity contributed to and is reflected in the City's Adequate Sites Analysis (see Appendix D).
- Included a housing impact statement with information on existing affordable housing stock on staff reports to Planning Commission and City Council for 2019 and 2020.

Disproportionate Housing Needs

- Funded housing preservation and development activities:
 - Preserved 1,443 affordable housing units at 60% of AMI or lower during the 2013-2018 period through actions by the San Diego Housing Commission (SDHC), the City's public housing agency.
 - Issued over \$1 billion in tax-exempt multifamily affordable housing bonds and almost \$150 million in affordable housing development and acquisition / rehabilitation loans by SDHC.
- Released an RFP seeking multifamily affordable housing developments for former Redevelopment Agency-owned housing assets for the purpose of developing affordable housing within the City of San Diego anticipated to be between \$30 million to \$50 million to support the new construction of affordable housing.

Displacement

- Enacted eviction protection ordinances to protect renters during the COVID-19 pandemic with a temporary ban on evictions that took effect on July 1, 2021. The SDHC took the lead on providing assistance and worked with community organizations to spread the word about tenants' rights and the temporary eviction ban with City of San Diego residents:
 - Casa Familiar
 - Chicano Federation
 - City Heights Community Development Corporation
 - ElderHelp of San Diego
 - Logan Heights Community Development Corporation
 - The San Diego LGBT Community Center
 - Serving Seniors
 - Union of Pan Asian Communities
 - Urban League of San Diego County
- Administered the COVID-19 Housing Stability Assistance Program for qualifying households for residents in the City of San Diego pay rent and utilities through federal award from the U.S. Department of the Treasury.
- Maintained the City's Mobilehome Park Discontinuance and Tenant Relocation Regulations (San Diego Municipal Code Chapter 14 Article 3 Division 6) to minimize adverse impacts on the housing supply and on displaced persons.

Enforcement

- Provided fair housing outreach and enforcement with LASSD as the City's fair housing provider for critical fair housing services.
- Published annual reports on housing production in San Diego from 2018 through 2020 with data on the City's existing housing stock and new housing by community planning area, including naturally affordable housing and deed-restricted residential development.

Racially and Ethnically Concentrated Areas of Poverty (RECAPs) and Integration/Segregation

- Provided SDHC Choice Communities Program for Section 8 Housing Choice Voucher Holders. SDHC's designation by HUD as a "Moving to Work" (MTW) agency allows the City to administer a program for voucher-holders to move to neighborhoods that offer more transportation, education, and employment opportunities.

CONCLUSIONS, SUMMARY OF ISSUES, AND CONTRIBUTING FACTORS

In line with the trends and data maintained at the local and regional levels, the majority of fair housing cases and complaints reported to HUD are related to disability status. Disability complaints were the most prevalent type of housing discrimination complaint (56 percent) according to the National Fair Housing Alliance 2019 Fair Housing Trends Report.⁴⁹ This trend is also reflected in the outreach and feedback and warrants additional response for people with a disability who are having fair housing challenges. In reviewing the results of the outreach conducted for the AI, those residents surveyed who felt they were discriminated against responded that the most common causes for alleged discrimination were race. The other top causes from respondents were source of income and family status.

The trends related to fair housing cases filed are reflected in the larger pool of clients who seek out services locally. During a five-year period from FY 2014 to FY 2020, LASSD responded to housing discrimination complaints by serving over 19,000 San Diego County residents.⁵⁰ Based on the data reported by LASSD, most clients served by LASSD were lower income (87 percent) and white (66 percent).⁵¹ In addition, the results showed that fair housing issues disproportionately affected some City of San Diego County residents, specifically racial/ethnic groups. Black residents made up less than five percent of the total County population, yet represented 24 percent of fair housing complaints.⁵²

According to the AI, the majority of LASSD clients served resided in the City of San Diego. Over 10,000 residents had a housing discrimination complaint.⁵³ While the complaints average to less than 2,000 complaints per year, recent end of the year reports submitted by LASSD for the City indicate that the annual total number of fair housing intakes grew from 2,760 in 2018 to 2,905 in 2019. The total intakes grew again for a total of 4,093 in 2020.⁵⁴ Of those complaints that became clients, the majority of people were listed as extremely low income at or below 30 percent AMI (57 to 72 percent) and white (48 to 66 percent).

Action Steps

While the outreach and fair housing services generally increased throughout the region, the AI observed that information is obtained through many media forms, not limited to traditional newspaper noticing or other print forms. Increasingly fewer people rely on the newspapers to receive information, and public notices and printed flyers were not the most cost-effective and effective means to reach the community at large. Due to this impediment to outreach and fair

⁴⁹ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, p39.

⁵⁰ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, Table 77, p180.

⁵¹ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, Table 78 and Table 79, p181.

⁵² 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, p181.

⁵³ 2021-2025 San Diego Regional Analysis of Impediments to Fair Housing Choice, Table 77, p180.

⁵⁴ City of San Diego Economic Development Grants Management System Consolidated Annual Performance and Evaluation Report (CAPER) for 2018-2020

housing services, frequent workshops with targeted population should be conducted to allow for meaningful discussions and dissemination of useful information.

The recommended action steps in the AI include:

- Conduct education and outreach activities 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; and
- Include fair housing outreach as part of community events.

According to the AI prepared for the San Diego region, the major impediment to enforcement of fair housing is that enforcement activities are limited. Fair housing services focus primarily on outreach and education, and less emphasis is placed on enforcement. The main enforcement mechanism is regular fair housing testing. The recommended actions for all jurisdictions are to

- Provide press releases to local medias 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; and
- Expand testing to investigate emerging trends of suspected discriminatory practices

Increasing Housing Supply

Beyond additional outreach and enforcement, creating more housing at all income levels can be one of the best ways to address fair housing challenges. Any area where the supply of housing is much less than the demand, landlords and sellers will have many options on who they want to do business with, which creates opportunities for discrimination. To help mitigate this, the Housing Element contains many programs that address local supply issues. When vacant units have multiple offers, personal bias can become a large determinant of who becomes the successful candidate. But with a healthy balance of vacancies and home-seekers, factors related to economics can outweigh personal bias in candidate selection. As such, every program in the Housing Element that addresses supply challenges also addresses fair housing issues. This in combination with increased outreach and enforcement as described will be strong tools in ending housing discrimination in San Diego.

SUMMARY OF CONTRIBUTING FACTORS AND CONCLUSION

FAIR HOUSING ISSUE AREAS

The Assessment of Fair Housing for the City of San Diego's 2021-2029 Housing Element covers Integration and Segregation Patterns, Racially and Ethnically Concentrated Areas of Poverty (RECAPs), Disparities in Access to Opportunity, and Disproportionate Housing Needs including Displacement. This section provides a summary of these fair housing issue areas as well as the Sites Inventory and Fair Housing Enforcement and Outreach Capacity as key components of fair housing. As an introduction to the conclusion, it is important to not only summarize the trends for each of these issues, but also to see how the contributing factors related to demographics, discussed throughout the report are common to more than one issue area.

Table A-41: Summary of Contributing Factors					
	Integration/ Segregation	RECAPs	Access to Opportunities	Disproportionate Housing Needs	Displacement
<u>Race/Ethnicity</u>					
Legacy of redlining/Racially restrictive covenants and discriminatory rental and lending practices	X	X	X	X	X
Language barriers/cultural barriers	X	X	X	X	
<u>Income/Economic</u>					
Low household income	X	X	X	X	X
Low access to low poverty areas	X	X	X	X	X
Legacy of employment discrimination on family/ intergenerational resources	X	X	X	X	X
Low access to jobs	X	X	X	X	X
Low labor market engagement				X	X
Transportation time/cost			X		
Less than a high school education	X	X			X
Low access to proficient schools	X	X	X	X	X
Impacts of justice system involvement	X	X	X	X	X
Discrimination due to race, gender, familial status, immigration status	X	X	X	X	
Female single parent households	X	X		X	X
"Social network poverty" (family and friend network have fewer financial resources to assist loved ones/friends in need)				X	
Disability/Discrimination against families with members with disabilities/Limited accessible housing	X	X	X	X	

<u>Housing Type/Cost</u>					
Low housing supply/Tight housing supply and competition	X	X	X	X	X
Low overall supply of housing that is affordable compared to household incomes	X	X	X	X	X
Poor quality housing/options				X	X
Large supply of older naturally occurring affordable housing	X	X	X	X	X
Significant at-risk naturally occurring affordable housing supply				X	X
Insufficient affordable housing in wider community	X	X	X	X	X
Large families/Few large family units and the cost of large family units		X		X	X
Long Section 8 voucher waiting list	X	X	X	X	X
Gentrification				X	X
High rates of rentership		X		X	X
Rent increases/High rental costs		X		X	X
Financial burdens of security deposits and credit checks		X		X	
Credit checks/Background checks		X		X	
<u>Fair Housing</u>					
Property owners/managers lack of up-to-date fair housing knowledge			X	X	X
Landlord unwillingness to make repairs or conduct maintenance				X	
Tenants lack of fair housing knowledge				X	X
Cost/time to address discrimination and fair housing cases	X			X	X
Finding and accessing housing and fair housing information and services/Confusing Fair housing information	X	X		X	X
Challenges with technology for finding information on housing and fair housing		X	X	X	X
Transportation to/from fair housing providers		X		X	X

Integration/Segregation

Like many other cities across the nation, San Diego shares a history of social and employment discrimination, redlining of neighborhoods occupied by lower income residents and people of color, “White flight” around the turn of the 20th century, and more recent growth management initiatives that have disproportionately impacted lower income individuals and people of color. San Diego’s patterns of segregation are also the result of implementation of zoning in 1923 that protected single-family homes and reinforced racial and economic segregation, rezoning actions

that permitted encroachment of industrial uses near neighborhoods occupied by lower income individuals and people of color, and construction of freeways that displaced lower income residents. While many of the practices and government actions have since been deemed unconstitutional and/or immoral, the effects of these past actions are evident in the levels of segregation and integration throughout the City.

Within the City of San Diego, the pattern of development and history of discriminatory practices has resulted in concentrations of individuals on the basis of race, ethnicity, income, familial status, and to a lesser degree disability. Lower income individuals and people of color are disproportionately concentrated in areas to the east and south of downtown. In these areas, the residents have lower rates of homeownerships, higher rates of poverty, and less access to opportunity. Because of the patterns and the current inadequate housing supply for all income groups and populations, fair housing challenges exist and persist. More is needed to remove barriers to fair housing choice for all San Diegans.

RECAPs

Racially and Ethnically Concentrated Areas of Poverty (RECAPs) are found in the City of San Diego, as evidenced by the City's Climate Equity Index, the TCAC Area of High Segregation and Poverty Map, and the TCAC Opportunity Areas (2021) Map. These maps generally reflect the redlining maps from the 1930s, indicating that redlining has made a lasting impression on San Diego's neighborhoods.

The San Diego Regional Analysis of Impediments to Fair Housing Choice 2020 (AI) shows a higher percentage of Hispanic and Black residents living below the poverty line in San Diego county than White residents, minorities are underrepresented in terms of homeownership, and additionally, Black applicants consistently had the lowest approval rates when compared to other ethnic groups with the same income. When the percentage of owner-occupied households was compared with the race data in the County, the data in the AI shows that white loan applicants were overrepresented in the County while Hispanics were underrepresented, White applicants at all income levels had the highest loan approval rates, and the majority of owner-occupied households in San Diego County are White. The compilation of data shows that income, mortgage lending practices, and homeownership rates, which are not equal for individuals in San Diego County, affect access to opportunities.

Access to Opportunity

The City of San Diego's disparities in access to opportunity are a result of regional segregation of communities and schools; a transportation system that does not meet the needs of low income users; job centers located away from population centers, especially low income and RECAP communities; and governmental and private actions that have resulted in environmental hazards that disproportionately impact lower income residents and people of color. In San Diego County, Native American, Black, and Hispanic residents were more likely (compared to other racial/ethnic groups) to be impacted by poverty, limited access to proficient schools, lower labor participation rate. Black

residents were most likely to reside in areas with challenges related to environmental quality and accessibility to employment centers.

Access to Opportunity for Persons with Disabilities

Special mention is given to access to opportunities for persons with disabilities. The majority of the City's housing stock was built prior to the 1990 passage of the Americans with Disabilities Act. The current inventory of accessible housing units within the City is not only unknown, it is likely to be insufficient to meet the needs of persons with disabilities given that as of 2017, almost one in ten City residents had a disability, including almost one in three residents age 65 and older. Employment discrimination and regulations regarding earned income combined with high housing costs and low inventory in San Diego compound challenges faced by disabled individuals.

Persons with disabilities living in the City of San Diego are more likely to be unemployed and often rely on fixed income sources. Less income affects housing choice in that there are less financial resources available for living expenses. As it is acknowledged that individuals with disabilities have less financial resources, they also have more needs related to affordable housing and services. When what is needed are modifications and accommodations, there is actually a prevalence of housing discrimination against persons with disabilities by property owners and managers. The housing challenges faced by disabled individuals can too often extend to homelessness, as the majority of adults in emergency shelters, transitional housing, and permanent supportive housing are disabled.

While persons with disabilities are living in a fairly dispersed pattern throughout the City, non-elderly persons with disabilities are more likely to be living in inland areas and areas that coincide with RECAPs, low and moderate income areas, and displacement risk areas while elderly persons with disabilities are more likely to be living in coastal areas with high median incomes. While there are some supportive housing facilities located in central San Diego, a larger proportion are located away from the central city and in unincorporated areas or cities just outside of the City of San Diego. This pattern perhaps results from the location of housing units with 3 or more bedrooms and/or rental or ownership housing cost patterns. City of San Diego zoning requirements may also contribute to the gap. Current regulations for Residential Care Facilities, which are categorized with supportive housing for drug and alcohol rehabilitation facilities, require a physical separation between facilities. This requirement could be a barrier to the development of additional supportive housing facilities within the City.

The barriers to access to opportunity extend beyond the local zoning regulations to include a lack of publicly supported housing for persons with disabilities, affordable in-home or community-based supportive services, affordable and accessible housing in range of unit sizes, affordable and integrated housing for individuals who need supportive services, and assistance for housing accessibility modifications.

Disproportionate Housing Needs

Multiple factors contribute to disproportionate housing needs, starting with income.

- Low income: Lower income households were disproportionately likely to experience the housing problems of incomplete kitchen and bathroom facilities, cost burden, and overcrowding. Because race is a factor in income, Hispanic and Black households experience this housing burden more than others. Lower-income households represented over 28 percent of all households in San Diego County in 2012-2016, and within that group, Hispanic (40.9 percent) and Black (36.8 percent) households had a considerably higher proportion of lower-income households than the rest of the county.
- Access to opportunity: Educational attainment is a main predictor of household income. In turn, lack of access to opportunity (quality schools, educational attainment, employment opportunities, and transportation options) contributes to low household income, housing problems, and displacement risk. In the City of San Diego, Black and Hispanic residents have the lowest access to proficient schools, labor market engagement, jobs, and healthy environments. This is reflected in the low rates of adults with a college degree and high rates of adults with less than a high school diploma in Displacement Risk Areas.
- Disconnection between jobs and housing: When there is a lack or imbalance of affordable housing near the job centers within the city and the region, this affects the income and opportunities for lower income, non-white and disabled populations. The coastal and northern areas of the city and county tend to be the areas with a wide range of wage levels and employment sectors along with the highest housing costs. While bus and trolley transit service connections are available within these employment areas, transit is not always the most convenient travel option often due to infrequent or lack of service and mobility connections or longer commute distances from the areas with more affordable housing options. When a single-occupant motor vehicle is the travel mode of choice, persons who lack ready access to an automobile due to cost or driving ability are disproportionately affected.
- Increasing rents: Increasing rents exacerbate housing cost burden, decrease housing options and increase likelihood of households having to accept insufficiently sized and substandard housing. Rising rents also result in household moves due to rent increases and increased evictions. Overall, not only are rent increases shown to disproportionately affect non-White residents, ethnic minority populations in San Diego County experience lower rates of homeownership than the White population. According to the 2013-2017 ACS data, Whites are 46 percent of the county population yet represent 64 percent of the owner occupied housing units. As a comparison, Hispanics are 33 percent of the population and represent only 18 percent of the owner-occupied housing units.

- Inadequate housing supply: The inadequate housing supply in the City and the region has contributed to increasing rents and availability of affordable housing for a range of household incomes. As discussed in the Housing Element, average monthly rents have risen by 42 percent since 2012. In the current situation, where housing supply is low and costs continue to increase, the potential for displacement of low income households increases as rents and property values rise and, access to opportunity decreases as income and wealth barriers to housing in communities with opportunity and job proximity grow.

Displacement Risk

When reviewing available information regarding local and regional patterns and trends within displacement risk areas, it appears that average median income and the average number of people with a high school degree or college degree are lower. The majority of the areas have a high rent, leading to a high rent burden for the majority of the population. Almost all displacement risk areas within the City of San Diego are disadvantaged and most of the housing is Naturally Occurring Affordable Housing. This indicates that any investment within the displacement risk areas can lead to further gentrification of these neighborhoods. While the City seeks out ways to increase the housing inventory, it is clear that any re-zone or up-zone will need to incorporate the mandatory affordable housing component to ensure housing for all income categories is provided.

Sites Inventory

The adequate sites inventory is one way to address displacement risk as well as RECAPS and access to opportunities. The City's adequate sites inventory has identified housing capacity for above moderate, moderate, and lower income housing throughout the city in communities that largely developed before the 1970s and in areas that are newly developing or transitioning areas from minimal development to developed. The inventory has also identified housing capacity across income levels both within and outside of minority concentration areas, poverty concentration areas, RECAPs, displacement risk areas, areas with significant existing affordable housing supplies, and high resource areas.

While there is capacity both within and outside of minority and poverty concentration areas, development of lower income housing without applying the fair housing lens could exacerbate existing conditions that concentrate lower income San Diegans and San Diegans from certain racial and ethnic groups. Housing capacity in high opportunity areas is more limited than housing capacity in areas with moderate to low opportunity. However, the same is true for the capacity both within and outside of high opportunity areas. Development of lower income housing without applying the access to opportunity lens could exacerbate existing conditions that limit lower income San Diegans' access to opportunity.

The City needs to address fair housing conditions and seek ways to mitigate displacement. Without mitigation, development in displacement risk areas can result in

displacement of residents in naturally occurring affordable housing and residents of lower incomes. However, new development in displacement risk areas can bring the benefit of improving poverty and minority concentration issues even as it threatens displacement of lower income individuals and renters.

Fair Housing Enforcement

Consistent with trends and data at the regional and national level, the majority of local fair housing cases and complaints are disability-related, with the majority of client seeking services listed as low income. According to the AI, fair housing issues disproportionately affected minority racial/ethnic groups who represent a higher proportion of fair house complaints than they make up in the total population across the City and the County. Even though there are documented cases and a pattern of alleged discrimination based on race, income and family status, fair housing enforcement is limited. Beyond training and outreach, more enforcement resources are required to more adequately investigate, address, and reduce discriminatory practices that contribute to fair housing challenges.

CONCLUSION

While the factors contributing to the fair housing conclusions and issues identified above are numerous and comprehensive, several factors are repeated throughout for the trends they show and their impact:

- Low incomes for many San Diegans, and disproportionately for Black, Latino, Native American, Pacific Islander, and disabled individuals
- Suburban development patterns with large areas of low-density and single-family housing near large employment centers and areas of high opportunity that limit housing supply and therefore access to employment and opportunity areas
- Limited transit service in and connecting to high opportunity areas due to low density land uses
- Limited housing supply combined with a demand for housing that increases housing costs to levels many San Diegans are not able to afford
- Limited financial resources to subsidize affordable housing development

Creating more housing at all income levels and creating programs to address segregated areas are needed to address fair housing challenges. Investments are needed in key areas. Any area where the supply of housing is much less than the demand can open up opportunities for discrimination. To help mitigate this, the Housing Element contains many programs that address local supply issues, better jobs housing balance, the supply of affordable housing and programs and services for vulnerable populations.

FAIR HOUSING CONTRIBUTING FACTORS AND PROGRAMS DESIGNED TO MEANINGFULLY ADDRESS FACTORS

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
Access to Opportunity, RECAPs, and Integration/ Segregation	<ul style="list-style-type: none"> • Insufficient affordable housing in wider community • Low access to low poverty areas • Discrimination due to race, gender, familial status, immigration status • Legacy of employment discrimination on family/ intergenerational resources 	<ul style="list-style-type: none"> • High (all) 	<p>➤ Access to Opportunities and Housing Legislative and Action Package components:</p> <ul style="list-style-type: none"> • Complete the Plan Hillcrest, University, Mira Mesa, and Clairemont Community Plan Updates (CPU) and Amendments (CPA) to allow for more affordable housing in high opportunity areas • Include an equity statement within the housing impact statement section of all staff reports to Planning Commission and City Council • Revise CPU prioritization criteria following adoption of the SANDAG Regional Plan to identify plan amendment or update opportunities along new planned transit routes and to consider greater equity factors • Develop an initiative to open up housing opportunities for all income groups in all zones that allow residential development • Present an ordinance to City Council to allow for affordable housing development on public agency and non-profit affiliated properties • Present an ordinance to City Council to allow for by-right residential development in all commercial zones with access to transit • Expand the offsite density bonus program to allow for covenant-restricted units to be located outside of the same community planning area if the receiver site is located 	<ul style="list-style-type: none"> • [Housing and employment] Mobility strategies • New housing choices in areas of opportunity

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			<p>in a high resource area within a TPA and the community has a low percentage of covenant-restricted housing units</p> <ul style="list-style-type: none"> ➤ Fair Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Develop educational program to address mortgage lending discrimination that disproportionately • Pursue increasing public transportation services and decreasing costs for residents reliant on transit • Partner with local schools to increase awareness of and pathways to employment • Expand Fair Housing outreach and enforcement • Expand funding of existing enforcement reporting to include location information and better inform regional and local trends • Identify opportunities to collaborate with local organizations to support Fair Housing training and education for property owners, property managers, and tenants in multiple languages and formats • Increase support for Fair Housing services, outreach, and publicity to reduce discrimination against Black residents, undocumented residents, non-native English speaker residents, families with children, and Section 8/ Housing Choice Voucher holders • Support non-profit organizations that improve the employment options for residents with less than a high school or college education ➤ Community Plan Updates ➤ Housing Ordinance and Policy Team ➤ Annual Municipal Code Updates ➤ Accessory Dwelling Unit Incentive Program 	

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			<ul style="list-style-type: none"> ➤ Affordable Housing Density Bonus Program ➤ Affordable/Infill Housing and Sustainable Buildings Expedite Program ➤ Historic Neighborhood Accessory Dwelling Unit Guidance ➤ Moderate Income Density Bonus Program ➤ Community Balance ➤ Choice Communities Program for Section 8 Housing Choice Voucher Holders ➤ Deferred Payment 3% Interest Loan Program ➤ Closing Cost Assistance Program ➤ First-Time Homebuyers Education, Counseling, Training and Workshops ➤ Low-Interest Loans for Housing Development ➤ Mortgage Credit Certificate Program ➤ City-County Reinvestment Task Force ➤ City Council Policy 900-09, Community Reinvestment 	
Access to Opportunity, RECAPs, and Integration/Segregation	Legacy of redlining/Racially restrictive covenants and discriminatory rental and lending practices	High	<ul style="list-style-type: none"> ➤ Fair Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Allocate funding for youth programs and other services in RECAPs and segregated areas ➤ Access to Opportunities and Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Present the Parks Master Plan (PMP) to the City Council for adoption. The PMP prioritizes parks in disadvantaged and underserved communities to ensure park improvements benefit the most in need • Implement the “Infrastructure Now” initiative to prioritize infrastructure improvements in disadvantaged and underserved communities to ensure the improvements benefit the most in need 	<ul style="list-style-type: none"> • Place based strategies to encourage community conservation and revitalization • Protecting existing residents from displacement

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			<ul style="list-style-type: none"> • Implement the Neighborhood Enhancement Fee (NEF), in which at least 25% of the funds collected citywide are expended on affordable housing preservation activities and at least 25% of the funds are expended on recreation amenities, active transportation, and transit infrastructure projects within disadvantaged communities • Implement the Active Transportation Fee, in which at least 50% of the funds collected citywide are expended on walking, bicycling, or transit infrastructure projects within disadvantaged communities • Pursue amendment to the Land Development Code to make the SB 330 Dwelling Unit Protection Regulations permanent (currently set to sunset in 2025) • Prepare a Priority Preference ordinance for new covenant-restricted affordable units within disadvantaged communities • Participate in the San Diego Housing Commission Housing Preservation Working Group to develop policies, programs, and funding sources for greater housing preservation citywide <ul style="list-style-type: none"> ➤ HUD Entitlement Grants, the City's Consolidated Plan, and the Consolidated Plan Advisory Board ➤ Placemaking Program ➤ Innovative Public Engagement ➤ Equity-Specific Outreach ➤ Climate Action Plan ➤ Transportation Demand Management 	

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
Access to Opportunity for Persons with Disabilities	Limited accessible and/or supportive housing	High	<p>➤ Access to Opportunities and Housing Legislative and Action Package components:</p> <ul style="list-style-type: none"> • Through CPUs and Municipal Code amendments, incentivize and encourage the development of more permanent supportive housing for people with physical and developmental disabilities and other residents living in areas of high need and high opportunity • Adopt an ADA Accessible Housing Incentive Program to expand opportunities for ADA accessible housing in all residential zones • Work with SANDAG to provide greater transit access for residents with disabilities and provide access to job centers, health care, and regional places of interest • Fair Housing Legislative and Action Package components: • Seek and support additional funding for Independent Living services • Pursue additional funding for organizations that provide State-mandated support for persons with disabilities • Increase support for Fair Housing services, outreach, and publicity to address reasonable accommodations, disability discrimination, senior discrimination and accessibility discrimination in housing • Fund housing preservation and development activities • Increase funding for enforcement actions to remedy substandard rental housing 	<ul style="list-style-type: none"> • Place based strategies to encourage community conservation and revitalization • [Housing and employment] Mobility strategies • New housing choices in areas of opportunity • Protecting existing residents from displacement

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			<p>conditions and provide education to property owners</p> <ul style="list-style-type: none"> • Pair code enforcement activities with requirements to minimize tenant displacement during repairs • Increase funding for housing repair assistance and subsidy programs, especially in displacement risk areas <p>➤ Housing Ordinance and Policy Team</p> <p>➤ Annual Municipal Code Updates</p> <p>➤ Accessory Dwelling Unit Incentive Program</p> <p>➤ Voluntary Accessibility Program</p>	
Access to Opportunity for Persons with Disabilities	Discrimination against families with members with disabilities	High	<p>➤ Access to Opportunities and Housing Legislative and Action Package components:</p> <ul style="list-style-type: none"> • Through CPUs and Municipal Code amendments, incentivize and encourage the development of more permanent supportive housing for people with physical and developmental disabilities and other residents living in areas of high need and high opportunity • Adopt an ADA Accessible Housing Incentive Program to expand opportunities for ADA accessible housing in all residential zones <p>➤ Affirmatively Furthering Fair Housing</p> <p>➤ Fair Housing Legislative and Action Package components:</p> <ul style="list-style-type: none"> • Seek and support additional funding for Independent Living services • Pursue additional funding for organizations that provide State-mandated support for persons with disabilities • Increase support for Fair Housing services, outreach, and publicity to address reasonable accommodations, disability 	<ul style="list-style-type: none"> • New housing choices in areas of opportunity • Protecting existing residents from displacement

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			discrimination, senior discrimination and accessibility discrimination in housing	
Access to Opportunity for Persons with Disabilities	Low household income	High	<ul style="list-style-type: none"> ➤ Fair Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Identify funding for and publicize employment support for persons with disabilities • Seek and support additional funding for Independent Living services • Pursue additional funding for organizations that provide State-mandated support for persons with disabilities ➤ Accessory Dwelling Unit Incentive Program ➤ Affordable Housing Density Bonus Program ➤ Affordable/Infill Housing and Sustainable Buildings Expedite Program ➤ Moderate Income Density Bonus Program ➤ Rental Housing Assistance Program (Section 8 Housing Choice Voucher Program) 	<ul style="list-style-type: none"> • New housing choices in areas of opportunity
Disproportionate Housing Needs – Overcrowding, Substandard Housing, Rent Burden	<ul style="list-style-type: none"> • Low household income • Insufficient affordable housing • Large supply of older naturally occurring affordable housing 	High (all)	<ul style="list-style-type: none"> ➤ Access to Opportunities and Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Create a Large Family Unit affordable housing incentive program encouraging 3-bedroom units in quality transit areas • Present an ordinance to City Council to allow for affordable housing development on public agency and non-profit affiliated properties • Implement the Complete Communities Housing Solutions program in areas near quality transit ➤ Fair Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Increase funding for Rapid Rehousing and Homelessness Prevention services 	<ul style="list-style-type: none"> • Place based strategies to encourage community conservation and revitalization • [Housing and employment] Mobility strategies • New housing choices in areas of opportunity • Protecting existing residents from displacement

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			<ul style="list-style-type: none"> • Increase funding and outreach in multiple languages about the City's Minimum Wage Enforcement program • Fund housing preservation and development activities • Increase funding for enforcement actions to remedy substandard rental housing conditions and provide education to property owners • Pair code enforcement activities with requirements to minimize tenant displacement during repairs • Increase funding for housing repair assistance and subsidy programs, especially in displacement risk areas • Increase education and outreach on City and State Source of Income Discrimination laws and regulations • Advocate for federal funding increases and simplified applicant requirements for the Temporary Assistance for Needy Families (TANF) program • Partner with local schools to increase awareness of and pathways to employment • Support non-profit organizations that improve the employment options for residents with less than a high school or college education <ul style="list-style-type: none"> ➤ Community Plan Updates ➤ Housing Ordinance and Policy Team ➤ Annual Municipal Code Updates ➤ Accessory Dwelling Unit Incentive Program ➤ Affordable Housing Density Bonus Program ➤ Affordable/Infill Housing and Sustainable Buildings Expedite Program ➤ Historic Neighborhood Accessory Dwelling Unit Guidance 	

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			<ul style="list-style-type: none"> ➤ Moderate Income Density Bonus Program ➤ Homeowner Repair Programs ➤ Housing Acquisition and Rehabilitation Program ➤ Housing Preservation Program ➤ Rental Housing Assistance Program (Section 8 Housing Choice Voucher Program) 	
Disproportionate Housing Needs – Homelessness	<ul style="list-style-type: none"> • Low household income • Limited accessible and/or supportive housing 	High (all)	<ul style="list-style-type: none"> ➤ Access to Opportunities and Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Through Municipal Code amendments, incentivize the development of more permanent supportive housing for homeless persons • Present an ordinance to City Council to allow for affordable housing development on public agency and non-profit affiliated properties • Through Municipal Code amendments, incentivize the development of more permanent supportive housing for homeless persons • Pursue amendment to the Land Development Code to make the SB 330 Dwelling Unit Protection Regulations permanent (currently set to sunset in 2025) • Participate in the San Diego Housing Commission Housing Preservation Working Group to develop policies, programs, and funding sources for greater housing preservation citywide • Implement Single Resident Occupancy preservation ordinance updates ➤ Fair Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Increase funding for Rapid Rehousing and Homelessness Prevention services 	<ul style="list-style-type: none"> • Place based strategies to encourage community conservation and revitalization • [Housing and employment] Mobility strategies • New housing choices in areas of opportunity • Protecting existing residents from displacement

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			<ul style="list-style-type: none"> • Increase funding and outreach in multiple languages about the City's Minimum Wage Enforcement program • Fund housing preservation and development activities • Increase funding for enforcement actions to remedy substandard rental housing conditions and provide education to property owners • Pair code enforcement activities with requirements to minimize tenant displacement during repairs • Increase funding for housing repair assistance and subsidy programs, especially in displacement risk areas • Consider legislative and other options to limit use of arrest and incarceration history in the housing application and rental process • Increase education and outreach on City and State Source of Income Discrimination laws and regulations • Advocate for federal funding increases and simplified applicant requirements for the Temporary Assistance for Needy Families (TANF) program • Partner with local schools to increase awareness of and pathways to employment • Support non-profit organizations that improve the employment options for residents with less than a high school or college education <ul style="list-style-type: none"> ➤ Community Plan Updates ➤ Housing Ordinance and Policy Team ➤ Annual Municipal Code Updates ➤ Accessory Dwelling Unit Incentive Program ➤ Affordable Housing Density Bonus Program 	

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			<ul style="list-style-type: none"> ➤ Affordable/Infill Housing and Sustainable Buildings Expedite Program ➤ Historic Neighborhood Accessory Dwelling Unit Guidance ➤ Moderate Income Density Bonus Program ➤ 2-1-1 San Diego ➤ City of San Diego Community Action Plan on Homelessness ➤ Connections Housing Downtown ➤ Family Reunification Program ➤ Flexible Funding Program ➤ Homeless Outreach Team ➤ Housing Navigation Center ➤ Housing Opportunities for Persons with AIDS (HOPWA) ➤ Landlord Engagement and Assistance Program (LEAP) ➤ (Neil Good) Day Center Facility for Homeless Adults ➤ Project Homeless Connect ➤ Rapid Re-Housing ➤ Safe Parking Lots ➤ Homelessness Prevention / Diversion ➤ Storage Centers ➤ Temporary Bridge Shelters ➤ Veterans Village of San Diego ➤ Year-Round Interim Housing Program ➤ Housing Acquisition and Rehabilitation Program ➤ Housing Preservation Program ➤ HUD Entitlement Grants, the City's Consolidated Plan, and the Consolidated Plan Advisory Board ➤ Rental Housing Assistance Program (Section 8 Housing Choice Voucher Program) 	

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
Disproportionate Housing Needs – Homelessness	Impacts of justice system involvement	High	<ul style="list-style-type: none"> ➤ Fair Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Consider legislative and other options to limit use of arrest and incarceration history in the housing application and rental process ➤ Prosecution and Law Enforcement Assisted Diversion Services (PLEADS) 	<ul style="list-style-type: none"> • Other
Displacement Risk	<ul style="list-style-type: none"> • Low household income • Insufficient affordable housing • Significant at-risk naturally occurring affordable housing supply • Redevelopment of non-vacant residential sites • Gentrification/rent increases/high rental costs 	High (all)	<ul style="list-style-type: none"> ➤ Access to Opportunities and Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Pursue amendment to the Land Development Code to make the SB 330 Dwelling Unit Protection Regulations permanent (currently set to sunset in 2025) • Prepare a Priority Preference ordinance for new covenant-restricted affordable units within disadvantaged communities • Participate in the San Diego Housing Commission Housing Preservation Working Group to develop policies, programs, and funding sources for greater housing preservation citywide • Implement Single Resident Occupancy preservation ordinance updates • Present an ordinance to City Council to allow for affordable housing development on public agency and non-profit affiliated properties • Implement the Complete Communities Housing Solutions program in areas near quality transit ➤ Fair Housing Legislative and Action Package components: <ul style="list-style-type: none"> • Increase funding for Rapid Rehousing and Homelessness Prevention services • Increase funding and outreach in multiple languages about the City's Minimum Wage Enforcement program 	<ul style="list-style-type: none"> • Place based strategies to encourage community conservation and revitalization • [Housing and employment] Mobility strategies • New housing choices in areas of opportunity • Protecting existing residents from displacement

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			<ul style="list-style-type: none"> • Fund housing preservation and development activities • Pair code enforcement activities with requirements to minimize tenant displacement during repairs • Increase funding for housing repair assistance and subsidy programs, especially in displacement risk areas • Increase education and outreach on City and State Source of Income Discrimination laws and regulations • Develop greater tenant protections for City Council consideration • Seek and increase funding for tenant assistance and representation services for City residents • Advocate for federal funding increases and simplified applicant requirements for the Temporary Assistance for Needy Families (TANF) program • Partner with local schools to increase awareness of and pathways to employment • Support non-profit organizations that improve the employment options for residents with less than a high school or college education ➤ Mobilehome Park Regulations ➤ Legal Aid for Eviction/Unlawful Detainer Recipients ➤ Community Plan Updates ➤ Housing Ordinance and Policy Team ➤ Annual Municipal Code Updates ➤ Accessory Dwelling Unit Incentive Program ➤ Affordable Housing Density Bonus Program ➤ Affordable/Infill Housing and Sustainable Buildings Expedite Program 	

Fair Housing Issue	Contributing Factor(s)	Factor Priority (High, Medium, Low)	Meaningful Programs/Actions	Program/Action Type
			<ul style="list-style-type: none"> ➤ Historic Neighborhood Accessory Dwelling Unit Guidance ➤ Moderate Income Density Bonus Program ➤ 2-1-1 San Diego ➤ Rapid Re-Housing ➤ Safe Parking Lots ➤ Homelessness Prevention / Diversion ➤ Housing Acquisition and Rehabilitation Program ➤ Housing Preservation Program ➤ HUD Entitlement Grants, the City's Consolidated Plan, and the Consolidated Plan Advisory Board ➤ Rental Housing Assistance Program (Section 8 Housing Choice Voucher Program) 	