

# APPENDIX HE-D - ADEQUATE SITES INVENTORY

The City has an obligation under Housing Element law to identify sites for all types of housing, and with aggregate capacity that is adequate to meet the City's housing needs for the current Housing Element cycle. The Adequate Sites Inventory is an assessment of the housing capacity of land within the City, which must demonstrate that the **RHNA target of 108,036 housing units, including 44,880 lower income (extremely low, very low, and low income) affordable units**, can reasonably be achieved under the City's current land use plans and zoning regulations. Through the Adequate Sites Inventory for the 2021-2029 planning period, the City has demonstrated that it has **capacity for at least 174,678 housing units, including 72,191 housing units on sites adequate for lower income housing** based on criteria in California Government Code Section 65583.2 (full inventory report follows). Much of this capacity has been generated by community plan updates adopted since 2014.

Through its site inventory, the City identified 11,805 sites that are adequate for development of housing at above moderate and moderate income levels, and that have zoned housing capacity that is reasonably developable within the planning period. These sites have capacity for at least 174,678 net housing units under the sites' existing zoning (or proposed land use designation in certain circumstances), net of existing residential units on these sites. A subset of these sites meet the suitability criteria for sites adequate for lower-income (very low and low income) housing established by Government Code Section 65583.2. Out of the total 11,805 sites adequate for housing development, 1,036 sites meet the lower-income suitability criteria. These sites have zoned capacity for at least 72,191 net potential lower-income housing units.

## COMMUNITY PLAN UPDATES AND NEW HOUSING CAPACITY

The City's Adequate Sites Inventory includes many sites that have increased residential capacity resulting from a community plan update (an updated land use plan with associated rezoning) or focused community plan amendment (an amendment to a land use plan for a portion of a community with associated rezoning) adopted since the last Housing Element. Through community plan updates and focused plan amendments adopted since 2014, the City has created new housing capacity for over 74,000 units (see Table HE-D-1 below). Community plan updates and amendments adopted since the 2008 update to the City's General Plan have focused on identifying opportunities for transit-oriented residential and mixed-use development in accordance with the General Plan's City of Villages Strategy and the City's Climate Action Plan. Further, one of the priorities for recent community plan updates and amendments has been to increase opportunities for by right permit processing through the preparation

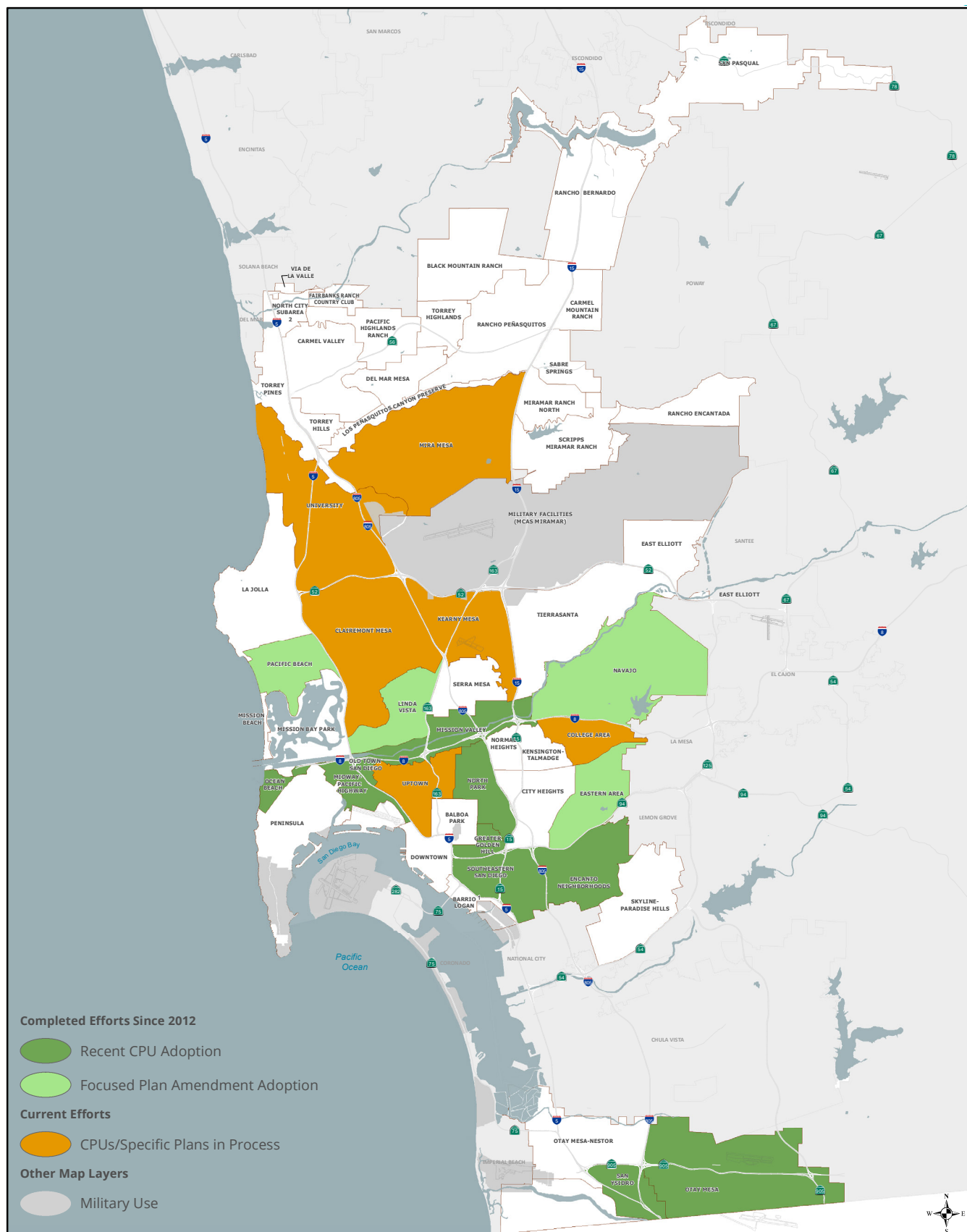
and adoption of an accompanying programmatic environmental document. Development projects consistent with the updated community plans and zoning can tier off the certified programmatic environmental document for the community plan or amendment, which simplifies and speeds up permit processing.

Through the community plan update and amendment processes, sites are carefully assessed to determine opportunities and constraints to development. This ensures that appropriate land uses and zones with realistic residential densities are applied. Some of the sites assessed through recent community plan updates and amendments were identified in the 4th Cycle or 5th Cycle Housing Element's Adequate Sites Inventory, but since have been redesignated and rezoned for increased residential capacity. Through in-process and future community plan updates and amendments, the City will continue to create new housing capacity throughout the 6th Housing Element cycle, expanding housing opportunities for all San Diegans.

**Table HE-D-1. New Housing Capacity Through Community Plan Updates Since 2014**

Community Plan Update / Amendment Name	Adoption Year	Added Housing Capacity (Units)
Mission Valley	2019	27,913
Morena Corridor (Linda Vista & Clairemont Mesa Community Plans)	2019	5,630
Balboa Avenue Station Area (Pacific Beach & Clairemont Mesa Community Plans)	2019	3,508
Old Town San Diego	2018	835
Midway-Pacific Highway	2018	6,545
North Park	2016	2,275
Golden Hill	2016	45
San Ysidro	2016	1,760
Ocean Beach	2015	102
Southeastern San Diego	2015	3,010
Encanto	2015	7,874
Grantville (Navajo Community Plan)	2015	8,275
Chollas Triangle (Mid-City Communities Plan)	2015	75
Otay Mesa	2014	6,374
<b>Total</b>		<b>74,221</b>

**Figure HE-D-1. Communities with Community Plan Updates (CPUs) and Amendments Since 2014**



# DEVELOPABLE SITES AND POTENTIAL CAPACITY

## METHODOLOGIES

State law requires that each jurisdiction demonstrate enough zoned housing capacity to meet each Housing Element Cycle's RHNA target. The City determines its housing capacity through a comprehensive review of vacant and non-vacant developable land throughout the City that may reasonably develop within the Housing Element planning period. The City of San Diego broadly inventory potentially developable land throughout the City. This approach has been adopted in acknowledgment that many factors affect housing development feasibility, trends, and developer and property owner choices within the City, and that the City cannot mandate housing development on private property or property owned by other government agencies.

The 6th Cycle Adequate Sites Inventory process has utilized multiple data sets combined with specified site criteria to identify sites where planned/zoned residential capacity can realistically be achieved. Further analyses of recent building permit data as well as community-specific constraints and opportunities have been used to inform assumptions made for the housing capacity of sites identified as developable. This assessment utilized SanGIS parcel data, City/San Diego Association of Governments (SANDAG) Series 14 land use capacity data; City land use designation, Environmentally Sensitive Lands (ESL), Multi-Habitat Planning Area (MHPA, i.e. conserved open space), historical resources, zoning, and building permit data; and other knowledge and information compiled by City staff in the Planning and Real Estate Assets Departments. This data has been compiled, organized, and mapped using Geographic Information Systems (GIS).

As stated above, through its site inventory, the City identified 11,805 sites that are adequate for development of housing at above moderate and moderate income levels, and that have housing capacity that is reasonably developable within the planning period. These sites have capacity for at least 174,678 net housing units under the sites' existing zoning (or proposed land use designation in certain circumstances), at 90 percent of maximum zoned capacity and net of existing residential units on these sites. These "net potential units" are shown for each assessed site in the Adequate Sites Inventory Report portion of this appendix. The methodology for determining housing capacity is described further below.

A subset of these sites meet the suitability criteria for sites adequate for lower-income (very low and low income) housing established by Government Code Section 65583.2. Out of the total 11,805 sites adequate for housing development, 1,036 sites meet the lower-income suitability criteria. These sites have zoned capacity for at least 72,191 net potential lower-income housing units, at 90 percent of maximum zoned capacity and net of existing residential units on these sites. These sites and the associated net potential units are described further in the "Suitability of Sites for Lower Income Housing" section of this appendix.



Developable sites identified through this assessment includes vacant and non-vacant sites with land use designations and zoning that permit residential uses, that are at least 4,000 square feet in size (smaller sites may be difficult to develop). Sites identified for lower income capacity, in accordance with State law, have a parcel size of greater than or equal to 0.5 acres and less than 10 acres; and have a zone that permits a minimum of 29 dwelling units per acre or greater, which is substantially equivalent to the City's default lower-income density of 30 dwelling units per acre.

To ensure that identified residential capacity could be achieved during the planning period, the following types of sites with zoning that permits residential uses have been excluded from the list of potential housing sites:

- Sites that have a small area (less than 4,000 square feet), difficult-to-develop shape, difficult-to-develop topography, or difficult to develop location (i.e. no existing or potential street or alley access)
- Sites that are known to Planning Department staff to have developed or redeveloped in the last 30 years, as the development likely has remaining useful life based on financial and operational considerations, and which do not appear to offer opportunities for additional development on the site based on existing structure placement and/or topography.
- Sites with rent-restricted affordable units that are legally required to remain affordable through the Housing Element planning period under applicable deed restrictions or other legal covenants
- Certain government-owned sites:
  - » City-owned sites that are needed for an existing or planned City use
  - » City-owned sites that are not currently utilized for City operations but have not yet been identified as potentially surplus and suitable for sale (i.e. having potential not to be needed for an existing or planned City use)
  - » Sites that are owned by other government agencies (e.g. County of San Diego, State of California, Federal government, San Diego Unified School District, Port of San Diego, etc.) that are outside of the land use jurisdiction of the City

## **HOUSING CAPACITY AND PAST HOUSING PRODUCTION BY COMMUNITY AND COMMUNITY TYPE**

For the purposes of assessing future development likelihood, the City's communities have been categorized into development typologies, as described below. These typologies, combined with past housing development data, illuminate recent trends in housing development interest and viability and demonstrate the impact of community plan updates on housing capacity and production.

## Community Typologies

The concepts “urban” and “suburban,” while describing development form and characteristics, are influenced by their context. The City of San Diego includes communities that exhibit varying degrees of the characteristics generally associated with these concepts/terms. Generally, San Diego’s more urban communities were the earliest communities to experience development, during eras where walking, horses, and streetcars were the predominant methods of personal transportation. Communities that developed prior to the popularization of the automobile tend to be more dense, walkable, and provide a diverse mix of single family and multi-family housing types.

Common qualities of urban areas include:

- Rectilinear, interconnected grid street network
- Walkable block sizes and connected sidewalk network due to regular street connections
- Commercial corridors and commercial buildings near residential areas
- Diversity of housing types and densities, including significant proportion of multifamily housing
- More transit services/routes and transit priority areas
- Pedestrian-oriented buildings and developments

Common qualities of suburban areas include:

- Meandering street network that insulates residential neighborhoods from major streets
- Large block sizes, especially on major streets, due to few street connections to residential neighborhoods
- Concentration of commercial uses in shopping centers separate from residential areas
- Predominantly low-density single family housing, with some areas of multifamily housing
- Fewer transit services/routes and transit priority areas
- Automobile-oriented buildings and developments

To categorize the City’s communities into typologies for the purposes of assessing past development trends and future development likelihood, the following community typologies will be used:

- 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 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.

### **Housing Capacity by Community and Community Typology**

The Adequate Sites Inventory has identified developable housing capacity primarily in urban communities, and in suburban communities that include employment centers. The identified housing capacity by community is as follows:

**Table HE-D-2. Housing Capacity by Community with Community Typology**

Community	Community Typology	Total Capacity (Housing Units)	Lower-Income Capacity (Housing Units)*
Barrio Logan <sup>2</sup>	Urban Tier 2 – Coastal & Employment	1,464	181
Carmel Mountain Ranch <sup>2</sup>	Suburban Tier 2	1,245	585
Clairemont Mesa <sup>2</sup>	Suburban Tier 1	4,710	2,501
College Area <sup>2</sup>	Suburban Tier 1	5,345	3,579
Downtown	Urban Core – Coastal & Employment	21,315	6,205
Encanto Neighborhoods <sup>1</sup>	Suburban Tier 1	5,972	2,766
Greater Golden Hill <sup>1</sup>	Urban Tier 1	1,401	181
Kearny Mesa <sup>1</sup>	Suburban Tier 1 - Employment	14,146	13,012
La Jolla	Suburban Tier 1 - Coastal	335	42

Community	Community Typology	Total Capacity (Housing Units)	Lower-Income Capacity (Housing Units)*
Linda Vista <sup>1</sup>	Urban Tier 2	4,401	2,064
Mid-City: City Heights	Urban Tier 1	5,640	1,695
Mid-City: Eastern Area <sup>1</sup>	Suburban Tier 1	6,265	3,829
Mid-City: Kensington – Talmadge	Urban Tier 2	1,422	561
Mid-City: Normal Heights	Urban Tier 1	1,307	233
Midway – Pacific Highway <sup>1</sup>	Urban Tier 2 - Employment	7,161	3,935
Mira Mesa <sup>2</sup>	Suburban Tier 2 - Employment	5,802	479
Miramar Ranch North	Suburban Tier 2	30	30
Mission Valley <sup>1</sup>	Urban Tier 2 - Employment	28,744	13,309
Navajo <sup>1</sup>	Suburban Tier 1 - Employment	8,314	6,122
North Park <sup>1</sup>	Urban Tier 1	8,858	503
Ocean Beach <sup>1</sup>	Urban Tier 2 - Coastal	1,101	121
Old Town <sup>1</sup>	Urban Tier 2	90	0
Otay Mesa <sup>+, 1, 2</sup>	Suburban Tier 2 - Employment	10,096	2,321
Otay Mesa-Nestor	Urban Tier 2	873	66
Pacific Beach <sup>1</sup>	Urban Tier 2 - Coastal	4,587	1,804
Pacific Highlands Ranch <sup>+</sup>	Suburban Tier 2	372	0
Peninsula <sup>2</sup>	Suburban Tier 1 - Coastal	3,478	1,064
Rancho Bernardo	Suburban Tier 2 - Employment	12	0
Rancho Encantada <sup>+</sup>	Suburban Tier 2	9	0
Rancho Penasquitos <sup>2</sup>	Suburban Tier 2	893	308
San Ysidro <sup>1</sup>	Urban Tier 2	1,850	668
Serra Mesa	Suburban Tier 1	796	723
Skyline – Paradise Hills	Suburban Tier 2	1,213	27
Southeastern San Diego <sup>1</sup>	Urban Tier 2	3,243	1,072
Torrey Pines	Suburban Tier 2 - Coastal	31	0

Community	Community Typology	Total Capacity (Housing Units)	Lower-Income Capacity (Housing Units)*
University <sup>2</sup>	Urban Tier 2 - Employment	749	405
Uptown <sup>1, 2</sup>	Urban Tier 1	11,408	1,800
TOTAL		174,678	72,191

\* 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).

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

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

### Recent Past Housing Production by Community

During the approximate period of the 5th Housing Element Cycle, development in the City of San Diego has occurred predominantly in urban communities (over 11,700 housing units), recently developed communities in Suburban Tier 2 (over 6,300 housing units), and Suburban Tier 1 communities which are typically within 10 miles of Downtown (over 4,800 units). Additionally, a significant number of housing units has been developed in communities where a Community Plan Update was adopted during the 5th Cycle (over 11,800 units), which can be attributed to some of the recently adopted community plans as well as continuing development interest in these communities. Recent past housing development figures by community are shown in the table below.

**Table HE-D-3. 2012–2018\* Housing Production by Community with Community Typology**

Community	Community Typology	Single Family	Multifamily	Total
Barrio Logan <sup>2</sup>	Urban Tier 2 – Coastal & Employment	0	204	204
Black Mountain Ranch <sup>+</sup>	Suburban Tier 2	1,196	678	1,874
Carmel Mountain Ranch <sup>2</sup>	Suburban Tier 2	0	0	0
Carmel Valley <sup>+</sup>	Suburban Tier 2 - Employment	3	84	87
Clairemont Mesa <sup>2</sup>	Suburban Tier 1	24	0	24
College Area <sup>2</sup>	Suburban Tier 1	39	465	504
Del Mar Mesa <sup>+</sup>	Suburban Tier 2	203	5	208
Downtown	Urban Core – Coastal & Employment			
East Elliott <sup>+</sup>	Suburban Tier 2	471	174	618
Encanto Neighborhoods <sup>1</sup>	Suburban Tier 1	115	947	1,062

Community	Community Typology	Single Family	Multifamily	Total
Fairbanks Country Club	Suburban Tier 2	57	0	57
Greater Golden Hill <sup>1</sup>	Urban Tier 1	10	91	101
Kearny Mesa <sup>1</sup>	Suburban Tier 1 - Employment	0	0	0
La Jolla	Suburban Tier 1 - Coastal	23	42	65
Linda Vista <sup>1</sup>	Urban Tier 2	20	63	83
Mid-City: City Heights	Urban Tier 1	41	22	63
Mid-City: Eastern Area <sup>1</sup>	Suburban Tier 1	15	607	622
Mid-City: Kensington – Talmadge	Urban Tier 2	11	0	11
Mid-City: Normal Heights	Urban Tier 1	14	0	14
Midway – Pacific Highway <sup>1</sup>	Urban Tier 2 - Employment	0	0	0
Mira Mesa <sup>2</sup>	Suburban Tier 2 - Employment	57	3,071	3,128
Miramar Ranch North	Suburban Tier 2	0	0	0
Mission Beach	Urban Tier 2 - Coastal	4	3	7
Mission Valley <sup>1</sup>	Urban Tier 2 - Employment	0	4,024	4,024
Navajo <sup>1</sup>	Suburban Tier 1 - Employment	93	2,338	2,431
Naval Air Station Miramar	N/A – Military Base	0	1,400	1,400
North Park <sup>1</sup>	Urban Tier 1	41	435	476
Ocean Beach <sup>1</sup>	Urban Tier 2 - Coastal	4	0	4
Old Town <sup>1</sup>	Urban Tier 2	1	0	1
Otay Mesa <sup>+, 1, 2</sup>	Suburban Tier 2 - Employment	0	2,037	2,037
Otay Mesa-Nestor	Urban Tier 2	1	199	200
Pacific Beach <sup>1</sup>	Urban Tier 2 - Coastal	29	33	62
Pacific Highlands Ranch <sup>+</sup>	Suburban Tier 2	2,310	460	2,770
Peninsula <sup>2</sup>	Suburban Tier 1 - Coastal	17	117	134
Rancho Bernardo	Suburban Tier 2 - Employment	4	144	148
Rancho Encantada <sup>+</sup>	Suburban Tier 2	21	0	21
Rancho Penasquitos <sup>2</sup>	Suburban Tier 2	48	342	390
San Ysidro <sup>1</sup>	Urban Tier 2	2	286	288
Scripps Miramar Ranch	Suburban Tier 2	0	95	95



Community	Community Typology	Single Family	Multifamily	Total
Serra Mesa	Suburban Tier 1	4	0	4
Skyline – Paradise Hills	Suburban Tier 2	41	0	41
Southeastern San Diego <sup>1</sup>	Urban Tier 2	48	266	314
Tierrasanta	Suburban Tier 2	1	0	1
Torrey Highlands <sup>+</sup>	Suburban Tier 2	310	242	552
Torrey Hills <sup>+</sup>	Suburban Tier 2	0	0	0
Torrey Pines	Suburban Tier 2 - Coastal	3	0	3
University <sup>2</sup>	Urban Tier 2 - Employment	14	2,298	2,312
Uptown <sup>1, 2</sup>	Urban Tier 1	24	367	391
Via De La Valle	Suburban Tier 2	6	0	6

\*Does not include 2017, as 2017 data by community is not available. May include differences from other reported data due to differing data sources and compilation methods.

<sup>+</sup> Recently developed community (former or developing greenfield land).

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

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

## HOUSING POTENTIAL ASSUMPTIONS – GENERAL

In general, the reasonable residential development potential of vacant and non-vacant sites has been assumed conservatively to be 90 percent of the maximum permitted density of the applicable zone. This assumption is based on analysis of multifamily building permits issued in the City over a 5-year period from 2012-2017, which showed an average residential project density of 80 percent of the zone maximum for market-rate projects and an average density of 122 percent of the zone maximum for projects utilizing the affordable housing density bonus program. The City's commitment to increasing residential development opportunities in combination with the high price of land in San Diego is resulting in increasingly efficient development at higher densities than was typical in past decades. Also, because of the strong demand for new residential units in San Diego, many recent development project applications are being submitted with residential densities near the maximum density allowed.

The City's community plans provide residential and mixed-use land use designations with maximum and minimum densities in dwelling units per acre. Zones that permit residential uses provide maximum allowed densities, but not minimum densities. Community plan maximum allowed densities generally correspond to the maximums allowed by the related zoning. The City enforces the zone maximum permitted residential density for projects that do not utilize the affordable housing density bonus program.

Projects seeking a higher-level discretionary permit are reviewed for project consistency with the General Plan and the associated community plan. Consistent with the General Plan’s guidance to enforce density minimums (Policy LU-C.4), the City enforces the community plan land use designation minimum permitted residential densities for applicable discretionary projects. City staff also encourage development projects to achieve densities as close as possible to the allowed maximums. Projects that propose to exceed the zone maximum permitted density are given the option to utilize the affordable housing density bonus program (or other related program), reduce the proposed density to the zone maximum, or apply for a community plan amendment and rezone to increase the permitted residential density in order to proceed with permit processing. Discretionary projects that are subject to General Plan consistency review and that propose a density below the community plan minimum permitted density are given the option to revise the project to increase the proposed density or to proceed to hearing to make their case for the lower proposed density to the permit decision maker.

## HOUSING POTENTIAL METHODOLOGY – SITES WITH COMMERCIAL AND MIXED USE ZONES

A substantial portion of the City’s reasonably developable housing capacity is attributable to sites with zoning that allows both residential and commercial uses. The zones that allow a mix of commercial and residential uses include the commercial zones in the CC, CN, CO, CV, and CR categories, as well as the City’s new mixed-use zones (EMX and RMX). The total number and percentage of sites in the inventory with commercial-residential permitted or mixed use zoning and their net potential units are shown in Table D-4.

The City has included all sites with commercial or mixed use zoning that have zoned residential capacity in this inventory, and utilized the methodologies described below for calculating realistic residential development potential.

**Table D-4. Commercial and Mixed Use Sites and Net Potential Units**

	Total (All Zones)	Total Lower Income	Commercial or Mixed Use	Commercial or Mixed Use (% of Total)	Commercial or Mixed Use - Lower Income	Commercial or Mixed Use - Lower Income (% of Total)
Sites	11,805	1,036	5,364	45.4%	623	60.1%
Net Potential Units	174,678	72,191	106,811	61.1%	42,551	58.9%

### Properties with a Commercial Zone that Permits Residential Uses

Per the City’s Municipal Code, Residential development in a commercial zone is permitted only when a commercial structure exists on the premises or is a part of the proposed development. A mixed-use

commercial and residential structure is considered a commercial structure, and the portion of a mixed use structure that must be comprised of commercial uses varies by zone as follows:

- CC-3-4, CC-3-5, CC-3-6, CC-3-7, CC-3-8, CC-3-9, CC-4-4, CC-4-5, CC-4-6, CC-5-4, CC-5-5, CC-5-6, CN-1-6, CO-3-1, CUPD-CT-2-4, CUPD-CU-2-4, CUPD-CU-2-5, CUPD-CU-3-3, and CV-1-2 zones: Residential uses prohibited on the ground floor in the front 30 feet of the lot.
- CC-1-1, CC-1-2, CC-1-3, CC-4-1, CC-4-2, CC-4-3, CC-5-1, CC-5-2, CC-5-3, CN-1-1, CN-1-2, CN-1-3, CN-1-4, CN-1-5, CO-1-1, CO-1-2, CO-3-2, CO-3-3, CR-1-1, CV-1-1, LJPD-1, LJPD-3, and LJPD-4 zones: Residential uses prohibited on the ground floor in the front 50 percent of the lot.

Given the limited extent of the ground floor residential prohibitions, these requirements are unlikely to preclude a development from reaching the zone maximum potential density. Further, many commercial zones provide for a Floor Area Ratio (FAR) bonus for mixed-use projects that incorporate residential and commercial uses. Therefore, consistent with general housing potential methodology, the housing potential of sites in these zones is calculated as 90 percent of zone maximum.

### **Properties with a Mixed Use Zone**

In late 2019, the City adopted six new mixed-use zones with the intention to increase residential density, support the need to locate housing near jobs; accommodate a flexible mix of uses; ground-floor flexibility to promote activation; and integrate vertical mixing of project components into a single structure or a horizontal mixing of uses. These new zones can be used to promote high-quality development without the need for discretionary permits or deviations from the existing zones which could decrease time and costs for applicants.

- The RMX zones (RMX-1, RMX-2, and RMX-3) are residential-focused mixed use zones that require that at least 50 percent of the site be utilized for residential use and allow up to 100 percent of the site to be used for residential use. Potential units on sites with an RMX zone are calculated as 90 percent of the maximum residential density of the applicable land use designation, rather than 90 percent of the maximum density of the applicable zone as in the general methodology, because the RMX zone limits residential development only by FAR and building height. The total number of sites in the inventory with RMX zoning is 16 (14 lower income-suitable), with 4,086 net potential units (2,970 net potential lower income units).
- The EMX zones (EMX-1, EMX-2, and EMX-3) are employment-focused mixed use zones that permits residential use as a secondary use (occupying less than 50 percent of development). Therefore, residential capacity for sites with the EMX zones is calculated as: site area multiplied by 50 percent, then multiplied by the maximum residential density of the applicable land use designation, then multiplied by 90 percent. Potential units are calculated using the maximum density of the applicable land use designation rather than the maximum density of the applicable

zone because the EMX zone limits development only by FAR and building height. The total number of sites in the inventory with EMX zoning is 56 (45 lower income-suitable), with 13,738 net potential units (5,573 net potential lower income units).

### **Likelihood of Development of Sites with Commercial or Mixed Use Zoning with Residential Uses**

It is difficult for the City to forecast which properties with zones that permit both stand-alone commercial use and commercial-residential mixed use will develop with mixed uses or with solely commercial. However, the City has seen significant numbers of development projects on sites with commercial-residential and mixed use zoning. Table D-5 provides examples of development with residential units that has occurred on such sites.

**Table D-5. Commercial-Residential Permitted and Mixed Use Zoned Sites Developed with Residential Units**

Project Location	Community & Community Type	Site Zone	Project Description
4890 Sunroad Centrum Ln.	Kearny Mesa Suburban Tier 1 - Employment	CC-1-3	419 market-rate residential units and 23 affordable units.
3877 Highlands Pl.	Pacific Highlands Ranch Suburban Tier 2	CC-1-3	77 affordable residential units.
5395 Napa St.	Linda Vista Urban Tier 2	CC-3-4	163 market-rate residential units and retail space.
6161 Fairmount Ave.	Navajo Suburban Tier 1	CC-3-8	383 market-rate residential units, including live-work storefront units.
2225 Commercial St.	Southeastern San Diego Urban Tier 2	CC-3-8	69 affordable residential units and 61 market-rate units.
2957-2979 C St.	Greater Golden Hill Urban Tier 1	CC-3-9, RM-3-9	40 market-rate residential units and retail space.
3531-3537 Del Rey St.	Pacific Beach Urban Tier 2 - Coastal	CC-4-2	15 market-rate residential units and office space.
4275 Mission Bay Dr.	Pacific Beach Urban Tier 2 - Coastal	CC-4-2	158 market-rate residential units and 14 affordable units with commercial space.
5135 University Ave.	Mid-City: City Heights Urban Tier 2	CC-5-4, RM-2-5	67 affordable residential units and 2 manager's units.

Project Location	Community & Community Type	Site Zone	Project Description
1475 Imperial Ave.	Downtown Urban Core	CCPD-E	275 affordable residential units.
320 W. Cedar St.	Downtown Urban Core	CCPD-R	43 market-rate residential units and commercial space.
1 14th St.	Downtown Urban Core	CCPD-MC	403 affordable residential units and 4 manager's units.
5003 Imperial Ave.	Encanto Neighborhoods Suburban Tier 1	CN-1-3	35 affordable residential units and 10 market-rate units.
7785 Mission Gorge Rd.	Navajo Suburban Tier 1	CN-1-2	89 affordable residential units and 1 manager's unit.
3233 Kemper St.	Midway-Pacific Highway Urban Tier 2 - Employment	CO-1-2	81 market-rate residential units and commercial space.
4029 43rd St.	Mid-City: City Heights Urban Tier 2	CUPD-CU-2-3	92 affordable residential units and retail space.
3808 El Cajon Blvd.	Mid-City: Normal Heights Urban Tier 1	CUPD-CU-2-4	53 affordable residential units and retail space.
1010 Outer Rd.	Otay Mesa-Nestor Urban Tier 2	CV-1-1	82 Single Room Occupancy units converted from hotel.
801 Pearl St.	La Jolla Suburban Tier 1 - Coastal	LJPD-4, RM-1-1	26 residential units and retail space.
3939 Iowa St.	North Park Urban Tier 1	MCCPD-CN-1, MCCPD-MR800B*	108 affordable residential units and office space.
3752 Park Blvd.	Uptown Urban Tier 1	MCCPD-CN-2*	25 market-rate residential units and 4 affordable units with office and retail space.

\* Former community-specific commercial-neighborhood and multifamily residential zones.

Also, the City has implemented the following incentives which can encourage residential uses on sites with commercial-residential permitted and mixed use zoning.

- FAR bonuses for commercial-residential developments in 30 of the 35 commercial zones that permit residential development.

- Interim ground floor residential use: Permits interim use of required ground floor commercial space in commercial zones for residential use for a period of up to 10 years with a Neighborhood Use Permit, to lessen the risk and potential financial impact of unleased commercial space.
- Infill development streamlining: Under the City's Affordable Housing, In-Fill Projects, and Sustainable Buildings Development Regulations, residential or mixed-use development in a Transit Priority Area (TPA) or San Diego Promise Zone with requested deviations to applicable Land Development Code regulations (with some exclusions regarding ESL and Historical Resources Regulations) can be processed through a Process 2 (staff approval with discretion) Neighborhood Development Permit.
- Amendments to Municipal Code to facilitate the construction of new development on a property with an existing use: As of 2019, the City provides a by-right process (Development on a Premises with a Utilized Development Permit) for achieving unrealized site capacity where the zone permits. This process increases opportunities for non-vacant sites to maintain the existing use and simultaneously take advantage of a site up-zone or any change in regulations, such as reduced parking requirements, that provide options for utilizing a site's full residential capacity. Additionally, this process encourages the build-out of communities as planned for and ensures that an existing use on a site is not a constraint to development.
- TPA parking standards: In 2019, the City Council adopted zero minimum parking regulations for multifamily residential developments (including multifamily residential units in mixed-use developments) in TPAs. The new parking regulations allow for more multifamily residential units to be built without parking to lower housing costs and encourage residents to use alternative modes of transportation such as walking, biking and transit.
- Shared parking: The shared parking requirements in the City's Parking Regulations allow for two or more nearby uses, including multiple unit residential uses, to share a portion of their required parking spaces.

## **HOUSING POTENTIAL METHODOLOGY – COMMUNITY-SPECIFIC AND SITE-SPECIFIC CONDITIONS**

Area-specific housing potential assumptions were made for certain communities and sites within the City to reflect differing land use planning and development regulation methodologies, as well as new development potential that may be adopted in the next few years through community plan amendments and updates. The area-specific housing potential assumptions utilized are as follows:

- Downtown: The remaining capacity under Downtown Community Plan Environmental Impact Report (EIR) was allocated to likely redevelopment sites, which may be less than the potential units per the Centre City Planned District Ordinance zoning for individual sites.



- Specific Plan Areas in Otay Mesa: Potential housing unit assumptions are consistent with Otay Mesa Community Plan EIR assumptions but less than potential units per zone, because the environmental analysis of the EIR was/will be utilized for the adoption of the Specific Plans.
- City's Sports Arena site: 1,400 potential housing units were assumed for the City-owned Sports Arena site, consistent with the Program EIR for the Midway-Pacific Highway Community Plan Update, which is less than potential units per the applicable land use designation and zone, due to presence of Sports Arena, multiple planned parks, and multiple planned new roads.
- Properties in the Kearny Mesa community: The Planning Department is in the late stages of preparing an update to the community plan for Kearny Mesa. The updated Kearny Mesa Community Plan is expected to go to the City Council for adoption in 2020. The community's land use designations and zoning currently permit residential uses only in a few, mostly developed areas. The proposed land use map and accompanying proposed zoning developed through the community plan update would allow significantly broadened and increased residential uses, but is not yet adopted. To capture the potential for residential uses in the community, the proposed land use map and zoning of the Kearny Mesa Community Plan Update are utilized as the basis for the community's housing unit capacity.
- Sites with a proposed community plan amendment: These are sites that are currently in process of changing the land use and density for a specific project. Sites are shown as proposed land use and density rather than the existing land use and density to reflect the housing potential of and development interest in these sites.
- Sites containing ESL or land within the MHPA have had their residential capacity calculated based solely on the site area outside of the ESL and/or MHPA.

## VACANT SITES

The Adequate Sites Inventory has identified vacant developable residential sites throughout the City that could develop within the current RHNA cycle. Vacant sites zoned for residential uses number 1,350 (11.4% of total sites) and could provide 22,595 future housing units (12.9% of total net potential units). Given the limited amount of vacant developable land remaining in the City, future housing will occur primarily on non-vacant sites.

Some vacant sites have been included in previous Housing Element cycles (see the "AB 1397 Requirements" section below). However, consistent with Government Code Section 65583.2(c), only sites with zones that allow multi-family housing by right (the San Diego Municipal Code does not differentiate between affordable and market-rate housing) and a maximum residential density at or above 29 dwelling units per acre (substantially equivalent to the City's default density of 30 dwelling units per acre) have been counted toward the City's capacity for lower income housing.

## NON-VACANT SITES

The City of San Diego has largely developed to the edges of its boundaries. Relatively few large, undeveloped areas outside of conserved open space remain, and much of the City's housing capacity is in the form of infill development opportunities. Correspondingly, recent development activities and trends indicate that the development of residential uses on non-vacant sites that are underutilized (based on adopted land use and zoning) is prevalent within urban areas throughout the City. This is consistent with the policies of the City's General Plan and its City of Villages strategy.

The City has identified 10,455 potential future non-vacant housing opportunity sites capable of accommodating 152,083 housing units. Many of these sites are located within communities that initially developed prior to or soon after World War II and that have been experiencing relatively recent redevelopment activity. The non-vacant housing opportunity sites are located predominantly in areas where the General Plan and other City policies encourage additional infill development such as in "village" areas near light rail stations or other transit hubs and along transit and commercial corridors. Some non-vacant sites have been included in previous Housing Element cycles. However, consistent with Government Code Section 65583.2(c), only sites with zones that allow multi-family housing by right (the San Diego Municipal Code does not differentiate between affordable and market-rate housing) and at or above 29 dwelling units per acre (substantially equivalent to the City's default density of 30 dwelling units per acre) have been counted toward the City's capacity for lower income housing. For additional discussion on the identification of sites for lower income housing, refer to the "Suitability of Sites for Lower Income Housing" section below.

Given the diversity and complexity of factors that influence property owner decisions regarding property development, and the large number of non-vacant sites with zoned residential capacity within the City of San Diego, it has been necessary for the purposes of this inventory to utilize simplified, standardized factors to decide which sites may realistically develop during the planning period. The broadest factor that the City has utilized is remaining residential development capacity, calculated as the difference between a site's zoned residential capacity and existing residential units on site, and expressed as a percentage of the site's zoned residential capacity. This factor was chosen over other potential factors (such as existing Floor Area Ratio) based on the availability of data for sites throughout the City.

Only non-vacant sites with at least 25 percent of remaining residential development capacity have been included in the inventory. This method for estimating reasonable potential for new development during the 2021-2029 period has been chosen based on a similar methodology used for Community Plan Updates. For its future land use assumptions for the purposes of Community Plan Updates and the associated environmental analysis, the City typically assumes that sites with at least 15 percent remaining residential capacity will redevelop during the Community Plan's useful life (20-30 years). For the purposes of the adequate sites inventory, the City has utilized a similar but more conservative figure of at least 25 percent remaining residential capacity as a threshold for realistic potential for residential

development during the Housing Element planning period. Sites with 25 percent or more remaining residential capacity are included in the inventory; sites with less than 25 percent remaining capacity are excluded from the inventory. Table D-6 shows the distribution of the sites and housing capacity in the adequate sites inventory by remaining undeveloped housing capacity. The City has adequate capacity on sites with 100 percent of their zoned housing capacity remaining undeveloped (i.e. no existing residential units on the site) to meet its total and lower-income RHNA targets.

**Table D-6. Sites and Housing Capacity by Undeveloped Site Housing Capacity**

Percent Undeveloped Site Capacity	Number of Sites	Net Potential Units	Net Potential Units (Lower Income)
25-49%	800	3,896	1,457
50-74%	3,116	13,966	3,450
75-99%	2,038	14,542	3,047
100%	5,851	142,274	64,237
Total	11,805	174,678	72,191

Non-vacant sites that are under condominium ownership have also been excluded from the inventory, due to the low likelihood that all condominium owners within a development would jointly decide to sell their units. Additionally, non-vacant sites that include designated historic resources have been excluded due to the protections afforded to the existing development under the City's Historical Resources Regulations.

The existing infrastructure in already developed areas can greatly reduce the cost of infrastructure needed to serve a new development, thereby facilitating development. To increase the realistic potential for the development of non-vacant sites during the planning period, the City has adopted and implemented many incentives and processes that encourage the development of non-vacant parcels:

- By-right permitting: The City provides a by-right process (Development on a Premises with a Utilized Development Permit) for achieving unrealized site capacity where the zone permits, to facilitate the construction of new development on a property with an existing use,. This process increases opportunities for non-vacant sites to maintain the existing use and simultaneously take advantage of a site up-zone or any change in regulations, such as reduced parking requirements, that provide options for utilizing a site's full residential capacity. Additionally, this process encourages the build-out of communities as planned for and ensures that an existing use on a site is not a constraint to development.
- Streamlining infill development with deviations: Under the City's Affordable Housing, In-Fill Projects, and Sustainable Buildings Development Regulations, residential or mixed-use development in a TPA or San Diego Promise Zone with requested deviations to applicable Land Development Code regulations (with some exclusions regarding ESL and Historical Resources regulations) can be processed through a Process 2 Neighborhood Development Permit.

- TPA parking standards: In 2019, the City Council adopted zero minimum parking regulations for multifamily residential developments (including multifamily residential units in mixed-use developments) in TPAs. The new parking regulations allow for more multifamily residential units to be built without parking to lower housing costs and encourage residents to use alternative modes of transportation such as walking, biking and transit.

The following statistics illustrate the realistic potential of sites with existing lower density development to redevelop with higher density development, and the increasing share of new development comprised by higher density multifamily housing. Changes in land uses since 2014 have increased allowed densities in much of the central portion of the City, which has resulted in the largest proportion of recent residential development being projects with 20 or more dwelling units. Between 2012 and 2017:

- The City's housing stock increased by six percent
- New development that included 20 or more dwelling units increased by 53 percent
- New development of single-family homes increased by ten percent
- The percentage of the City's housing stock consisting of developments with 2 to 19 units declined by 34 percent

Table HE-D-7 shows the number of units permitted in 2018 in the top 10 most active communities for development. The 2018 most active communities for development are primarily already developed communities, where development takes the form of infill and site redevelopment, capitalizing on the existing infrastructure and amenities that urbanized communities offer. Table HE-D-8 provides recent examples of redevelopment of non-vacant sites to higher-density residential use.

**Table HE-D-7. Top Ten Communities for Housing Units Permitted, 2018**

Community	Community Typology	2018 Units Permitted
Mission Valley	Urban Tier 2	844
Downtown	Urban Core	752
University	Urban Tier 2	235
Otay Mesa	Suburban Tier 2	230
San Ysidro	Urban Tier 2	207
East Elliot	Suburban Tier 2	188
Uptown	Infill	169
Black Mountain Ranch	Suburban Tier 2	160
Rancho Bernardo	Suburban Tier 2	148
North Park	Urban Tier 1	126

**Table HE-D-8. Non-Vacant Sites Redeveloped for Higher-Density Residential Use**

Project Location	Community & Community Typology	Permit Issued (Year)	Project Description
3752 Park Blvd.	Uptown Urban Tier 1	2014	A residential, retail, and office mixed-use project with 29 residential units, including four low-income affordable units, built on the former site of an auto repair garage.
4058 Utah St.	North Park Urban Tier 1	2016	6 dwelling units built on the former site of 3 residential units.
3740-3750 Third Ave.	Uptown Urban Tier 1	2016	12 dwelling units built on the former site of 2 residential structures (likely single-family residences).
123 Camino de la Reina	Mission Valley Urban Tier 2	2017	A residential, commercial, and retail mixed-use project with 284 residential units built on the former site of a commercial office complex.
500 Hotel Circle North	Mission Valley Urban Tier 2	2017	Partial redevelopment of the 40-acre site of the existing Town & Country hotel and convention center with 840 new residential units and accessory uses.
1492 K St.	Downtown Urban Core	2017	89 dwelling units built on the former site of a 24-unit Single Room Occupancy (SRO) hotel.
3047 North Park Way	North Park Urban Tier 1	2017	6 dwelling units built on the former site of a single-family residence.
3250 Adams Ave.	Mid-City: Normal Heights Urban Tier 2	2017	10 dwelling units and commercial space built on the former site of a commercial structure.
320 W. Cedar St.	Downtown Urban Core	2018	43 dwelling units and commercial space built on the former site of a commercial/residential building with one residential unit and stand-alone residential unit.
588 Camino Del Rio North	Mission Valley Urban Tier 2	2018	227 residential units in a mixed-use development on the former site of commercial structures and a car dealership.
392 Sycamore Rd.	San Ysidro Urban Tier 2	2019	18 residential units, including 2 low-income affordable units, built on the former site of a single-family residence.
1445 Washington St.	Uptown Urban Tier 1	2019	35 residential units, including 3 very-low income affordable units, built on the former site of four single family units.

As San Diego's economy continues to diversify, through its growing technology sectors and other job creation, it is experiencing a strong demand for infill housing to meet the needs of the workforce. At the same time, the City is experiencing market factors such as a limited land supply and low housing inventory. Many landowners of older commercial properties are willing to consider converting their land to residential use, or adding new structures to sites with existing development to increase densities or create mixed-use developments, because of the significantly higher market land value.

In addition to the aforementioned process for "Development on a Premises with a Utilized Development Permit," the City has adopted a number of incentives and Land Development Code provisions intended to provide increased flexibility for developing infill residential on non-vacant and/or small sites. The Land Development Code includes the Residential - Small Lot Zone, the Residential - Townhouse Zone, the Small Lot Subdivision regulations, and new Mixed Use zones in order to encourage higher density, transit-oriented development. Multiple-unit developments proposed for a legally-created lot are permitted through a ministerial action to enable an owner to generate the maximum number of units permitted by the designated zoning.

The City has also allowed for reduced minimum parking requirements in order to facilitate higher residential densities and reduce the cost of housing development, and to encourage the development of underutilized surface parking lots. Opportunities for reduced parking include the following:

- The City's TPA Multifamily Residential Parking Standards, as described above;
- The City's Transit Area Overlay Zone is applied in areas where there is a high level of transit service and allows lower off-street parking requirements;
- The Residential Tandem Parking Overlay Zone is also applied in certain areas where tandem parking spaces may be counted as two parking spaces, increasing efficiency in lot or building area devoted to parking; and
- The City's affordable housing parking regulations are applied to regulated rental affordable housing units where the units are affordable to very low income, low income, or moderate income households for a term of at least 55 years. The regulations apply parking ratios that vary based on the proposed housing type (family housing, SRO hotel, senior housing, studio & one bedroom, and special needs) and project location characteristics (walkability and transit access).

## **ACCESSORY DWELLING UNITS**

The City's Adequate Sites Inventory does not assess capacity for accessory dwelling units (ADUs, also known as companion units and junior units, as defined in the Municipal Code). ADUs are permitted in the City, including on sites zoned for single-family residential use, and incentives for ADU construction have been adopted. However, there is not yet sufficient data on ADU building permits since the adoption of ADU incentives to adequately identify likely sites and rates of future ADU construction.



## **AB 1486 CITY-OWNED LAND**

AB 1486, signed into State law in 2019, expands surplus property requirements for state and local government agencies. The bill includes amendments to Housing Element law to require that jurisdictions include government-owned sites that are zoned for residential use, vacant and non-vacant, in the Adequate Sites Inventory. The City's Real Estate Assets Department (READ) maintains a database of all City-owned properties. As an ongoing aspect of its operations and responsibilities, READ systematically reviews these properties to assess whether the properties are needed for City operations or whether they have potential to be declared surplus land and should be sold or leased.

If an assessment identifies a site as having potential to be surplus, READ staff follows a process to thoroughly review the property and the City's existing and future needs to ensure that property that could serve City operations or the needs of its citizens for public facilities is not disposed of prematurely. This review process includes notifications to all City departments of potential surplus property to provide an opportunity for City staff to inform READ of a City need for which a property should be retained. If no existing or planned City need is identified through this process, a site is considered "cleared for sale" and presented to the City Council for a decision whether the property is "surplus" and whether it should be sold or leased.

For the purposes of this adequate sites inventory, consistent with the provisions of AB 1486 regarding "exempt surplus land," the following types of city-owned sites are not included in the inventory:

- Sites that are needed for existing or planned City use, including storm water drainage, water storage and delivery, etc.
- Sites that have not been identified as potentially surplus and suitable for sale
- Sites that have been acquired by the City in relation to a legal claim
- Sites that are subject to a right-of-way easement that would need to be vacated by action of the City Council prior to potential housing permitting and development

Sites that have been identified as being potentially surplus and having potential for sale are included in the Inventory and grouped under the header "City-Owned Sites as of April 2020." This group includes 41 sites, including 12 sites that have been offered for sale by the City and are in escrow for purchase. These City-owned properties will be subject to the disposition requirements in AB 1486 with which the City will fully comply.

## **SUITABILITY OF SITES FOR MODERATE-INCOME HOUSING**

As stated in the Developable Sites and Potential Capacity Methodologies section above, the City has assessed sites generally suitable for housing development to be suitable for both moderate-income and above moderate income housing. Sites in the following zones are suitable for moderate-income

housing: AR-1-1, AR-1-2, BLPD-REDEVL-P-SUBD, BLPD-SUBD-A, BLPD-SUBD-B, CC-1-1, CC-1-2, CC-1-3, CC-3-4, CC-3-5, CC-3-6, CC-3-7, CC-3-8, CC-3-9, CC-4-1, CC-4-2, CC-4-3, CC-4-4, CC-4-5, CC-4-6, CC-5-1, CC-5-2, CC-5-3, CC-5-4, CC-5-5, CC-5-6, CCDC-AWAITS-CCC-APPR, CCPD-BP, CCPD-CORE, CCPD-E, CCPD-ER, CCPD-MC, CCPD-NC, CCPD-PC, CCPD-R, CN-1-1, CN-1-2, CN-1-3, CN-1-4, CN-1-5, CN-1-6, CO-1-1, CO-1-2, CO-3-1, CO-3-2, CO-3-3, CR-1-1, CUPD-CT-2-3, CUPD-CT-2-4, CUPD-CT-3-3, CUPD-CT-5-4, CUPD-CU-1-1, CUPD-CU-1-2, CUPD-CU-2-3, CUPD-CU-2-4, CUPD-CU-3-3, CUPD-CU-3-6, CUPD-CU-3-7, CUPD-CU-3-8, CV-1-1, CV-1-2, EMX-1, EMX-2, EMX-3, GLPD-GASLAMP-QTR, IP-3-1, LJSPD-SF, LJPD-1, LJPD-2, LJPD-3, LJPD-4, MPD-MARINA, OR-1-1, OR-1-2, OTCC-2-1, OTCC-2-2, OTCC-2-3, OTCC-3-1, OTCC-3-2, OTMCR-1-1, OTMCR-1-2, OTMCR-1-3, OTRM-1-1, OTRM-2-1, OTRM-2-2, RM-1-1, RM-1-2, RM-1-3, RM-2-4, RM-2-5, RM-2-6, RM-3-7, RM-3-8, RM-3-9, RM-4-10, RM-4-11, RM-5-12, RMX-1, RMX-2, RMX-3, RS-1-1, RS-1-2, RS-1-3, RS-1-4, RS-1-5, RS-1-6, RS-1-7, RS-1-8, RS-1-9, RS-1-10, RS-1-11, RS-1-12, RS-1-13, RS-1-14, RT-1-1, RT-1-2, RT-1-3, RT-1-4, RX-1-1, RX-1-2.

## SUITABILITY OF SITES FOR LOWER INCOME HOUSING

The adequate sites inventory identifies 72,191 total potential housing units on 1,036 sites that are suitable for lower income development, based on the criteria established by Housing Element law and the Department of Housing and Community Development. These units are identified on sites that:

- Have a minimum zoned and/or designated residential density of 29 dwelling units per acre;
- Have a minimum parcel size of 0.5 acres;
- Have a maximum parcel size of 9.99 acres; and
- Are both vacant and non-vacant.

**Table HE-D-9. Identified Sites Suitable for Lower-Income Housing**

	Total (All Income Levels)	Total Lower Income	Vacant	Vacant (% of Total Lower Income)	Non-Vacant	Non-Vacant (% of Total Lower Income)
Sites	11,805	1,036	118	11.4%	918	88.6%
Net Potential Units	174,678	72,191	4,900	6.8%	67,291	93.2%

### Sites Zoned/Designated for Adequate Density

The City of San Diego, as a metropolitan jurisdiction, has been assigned a default density of 30 dwelling units per acre for sites to be considered suitable for lower income housing. The City's zones and land use designations utilize the residential density ranges shown in Table HE-D-10, as established by the City's General Plan and codified in its Municipal Code. The City has also adopted Mixed Use Zones and

Planned District Ordinances that govern residential density by FAR rather than dwelling units per acre. See the Housing Potential Methodology – Sites with Commercial and Mixed Use Zones section above for additional information on Mixed Use Zones.

The Adequate Sites Inventory includes sites zoned/designated for a maximum of 29 dwelling units per acre as having potential for lower-income housing. The City considers this approach consistent with the default density of 30 dwelling units per acre, as the difference between 29 dwelling units per acre and 30 dwelling units per acre is negligible and as affordable housing density bonuses (available with a ministerial permit) can be utilized to meet and exceed 30 dwelling units per acre. Table HE-D-11 provides examples of affordable housing projects developed on sites zoned for maximum densities at or below 29 dwelling units per acre.

**Table HE-D-10. Zone/Designation Housing Densities and Associated Density Ranges**

Housing Density Description	Residential Density Range	Commercial / Industrial Density Range
Very Low	0 - 4 dwelling units per acre	N/A
Low	5 - 9 dwelling units per acre	N/A
Low-Medium	10 - 14 dwelling units per acre	N/A
Medium	15 - 29 dwelling units per acre	0-29 dwelling units per acre
Medium-High	30 - 44 dwelling units per acre 0 - 54 dwelling units per acre	0-44 dwelling units per acre
High	45 - 74 dwelling units per acre	0-74 dwelling units per acre
Very High	75 - 109 dwelling units per acre 110 - 218 dwelling units per acre	0-109 dwelling units per acre 0-218 dwelling units per acre

**Table HE-D-11. Sites Zoned At or Below 29 Dwelling Units Per Acre Developed for Affordable Housing**

Project Name and Address	Community & Community Typology	Zone & Maximum Density	Affordability
Verbena 3774 Beyer Blvd.	San Ysidro Urban Tier 2	RM-1-1: 15 du/ac RS-1-7: 9 du/ac	Very Low Income (55 units) Low Income (24 units)
Creskide Trails 2170 Coronado Ave.	Otay Mesa-Nestor Urban Tier 2	RM-1-1: 15 du/ac	Very Low Income (35 units) Low Income (14 units)
Mesa Commons 6470 El Cajon Blvd.	College Area Suburban Tier 1	RM-1-1: 15 du/ac RM-1-2: 17 du/ac	Very Low Income (40 units) Low Income (37 units)
Terramar Apartments 13481 Silver Ivy Ln.	Rancho Pensquitos Suburban Tier 2	RM-1-3: 22 du/ac RS-1-7: 9 du/ac	Very Low Income (4 units) Low Income (16 units)

Project Name and Address	Community & Community Typology	Zone & Maximum Density	Affordability
Cielo Carmel 6050 Camino San Fermin	Pacific Highlands Ranch Suburban Tier 2	RM-1-3: 22 du/ac	Very Low Income (21 units) Low Income (174 units)
Riverwalk Apartments 1194 Hollister St.	Otay Mesa-Nestor Urban Tier 2	RM-2-4: 25 du/ac	Very Low Income (35 units) Low Income (14 units)
Vista Del Puente 3934 Gamma St.	Southeastern San Diego Urban Tier 2	RM-2-5: 29 du/ac	Very Low Income (43 units) Low Income (8 units)
San Ysidro Senior Village 517 W. San Ysidro Blvd.	San Ysidro Urban Tier 2	RM-2-5: 29 du/ac	Very Low Income (50 units)
Paseo La Paz 160 W. Seaward Ave.	San Ysidro Urban Tier 2	RM-2-5: 29 du/ac	Very Low Income (32 units) Low Income (105 units)
El Pedregal 104 Averil Rd.	San Ysidro Urban Tier 2	RM-2-5: 29 du/ac	Very Low Income (32 units) Low Income (12 units)
Independence Point 327 S. Willie James Jones Ave.	Encanto Neighborhoods Suburban Tier 1	RM-2-5: 29 du/ac	Very Low Income (28 units) Low Income (3 units)
Mesa Verde 7785 Mission Gorge Rd.	Navajo Suburban Tier 1	RM-2-5: 29 du/ac CN-1-2: 29 du/ac	Very Low Income (9 units) Low Income (80 units)
Auburn Park 5135 University Ave.	Mid-City: City Heights Urban Tier 2	RM-2-5: 29 du/ac CC-5-4: 29 du/ac	Very Low Income (42 units) Low Income (25 units)
Luna 3877 Highlands Pl.	Pacific Highlands Ranch Suburban Tier 2	CN-1-3: 29 du/ac	Very Low Income (8 units) Low Income (69 units)
Ouchi Courtyards 5003 Imperial Ave.	Encanto Neighborhoods Suburban Tier 1	CN-1-3: 29 du/ac	Very Low Income (23 units) Low Income (11 units)

## Non-Vacant Sites

The inventory identifies 918 non-vacant sites that are zoned for the default density for sites that can accommodate development for lower income households in the City of San Diego. Non-vacant sites make up 88.6 percent of all sites identified as suitable for lower income affordable housing per Government Code Section 65583.2.

Relatively few large, non-open space areas remain within the City's boundaries; therefore, much of the City's housing capacity for all income levels is in the form of non-vacant and infill development opportunities. To implement climate action goals and reduce automobile reliance, the development of underutilized land within the City's urbanized areas in proximity to infrastructure, jobs, and amenities

has become increasingly necessary. Recent development activities and trends indicate that the development of residential uses on non-vacant sites that are underutilized (based on adopted land use and zoning) is occurring, including lower income housing. Data and examples supporting the suitability of already urbanized communities and non-vacant sites for the development of lower income housing is provided in Tables HE-D-12 and HE-D-13.

**Table HE-D-12. Affordable Units Permitted by Community, 2018**

Community	Community Type	Community Development Status	2018 Affordable Units Permitted
Mission Valley	Urban Tier 2	Developed	207
Encanto Neighborhoods	Suburban Tier 1	Developed	65
San Ysidro	Urban Tier 2	Developed	50
Downtown	Urban Core	Developed	48
Otay Mesa	Suburban Tier 2	Recently Developed	41
Uptown	Urban Tier 1	Developed	22
North Park	Urban Tier 1	Developed	8
Linda Vista	Urban Tier 2	Developed	8
Greater Golden Hill	Urban Tier 1	Developed	4
Mid-City: City Heights	Urban Tier 2	Developed	4

**Table HE-D-13. Non-Vacant Sites Developed for Lower-Income Housing**

Project Name and Location	Community & Community Type	Permit Issued (Year)	Affordability	Project Description
Auburn Park 5135 University Ave.	Mid-City: City Heights Urban Tier 2	2007	Very Low Income (42 units) Low Income (25 units)	An industrial site was redeveloped to build 67 affordable units and 2 manager's units.
Ten Fifty B 1050 B St.	Downtown Urban Core	2010	Very Low Income (126 units) Low Income (100 units)	A commercial structure was demolished to build 226 affordable units and 3 market-rate units.
Cedar Gateway 1612 6th Ave.	Downtown Urban Core	2011	Very Low Income/ MHSA (23 units) Low Income (42 units)	A church parking lot was developed to build 65 affordable units.

Project Name and Location	Community & Community Type	Permit Issued (Year)	Affordability	Project Description
Verbena 3774 Beyer Blvd.	San Ysidro Urban Tier 2	2011	Very Low Income (55 units) Low Income (24 units)	Two single-family residences were demolished to build 79 affordable units and one manager's unit.
Riverwalk Apartments 1194 Hollister St.	Otay Mesa-Nestor Urban Tier 2	2011	Very Low Income (35 units) Low Income (14 units)	A single-family residence was redeveloped to build 49 affordable units and one manager's unit.
Kalos 3795 Florida St.	North Park Urban Tier 1	2012	Very Low Income (9 units) Low Income (73 units)	Several single-family units were demolished to build 82 affordable units and one manager's unit.
Comm 22 Family Housing 225 Commercial St.	Southeastern San Diego Urban Tier 2	2013	Very Low Income (69 units)	A school district fleet facility was demolished to build 69 affordable units and 61 market-rate units.
Independence Point 327 S. Willie James Jones Ave.	Encanto Neighborhoods Suburban Tier 1	2014	Very Low Income (28 units) Low Income (3 units)	Three single-family units were redeveloped to build 31 affordable units and one manager's unit.
Los Vientos 1668 National Ave.	Barrio Logan Urban Tier 2	2015	Very Low Income (85 units) Low Income (3 units)	Single-family units and a commercial structure were demolished to build 88 affordable units and one manager's unit.
Ouchi Courtyards 5003 Imperial Ave.	Encanto Neighborhoods Suburban Tier 1	2015	Very Low Income (23 units) Low Income (11 units)	A commercial plant nursery was redeveloped to build 35 affordable units and 10 market-rate units.
Iowa Senior Housing 3939 Iowa St.	North Park Urban Tier 1	2015	Very Low Income (54 units) Low Income (51 units)	A commercial structure was demolished to build 105 affordable units and 3 market-rate units.
Talmadge Gateway 4412 Euclid Ave.	Mid-City: Kensington-Talmadge Urban Tier 2	2016	Very Low Income (59 units)	Strip commercial structures were demolished to build 59 affordable units and one manager's unit.



Project Name and Location	Community & Community Type	Permit Issued (Year)	Affordability	Project Description
Mesa Verde 7785 Mission Gorge Rd.	Navajo Suburban Tier 1	2016	Very Low Income (9 units) Low Income (80 units)	A commercial structure was demolished to build for 89 affordable units and one manager's unit.
Villa Encantada 505 62nd St.	Encanto Neighborhoods Suburban Tier 1	2016	Very Low Income (44 units) Low Income (15 units)	A transit station parking lot was redeveloped to build 59 affordable units and one manager's unit.
Nook East Village 1492 K St.	Downtown Urban Core	2017	Low Income (82 units) Low Income/VASH (8 units)	90 affordable units and one manager's unit were built on the former site of a 24-unit SRO hotel.
Bluewater 6121 Fairmount Ave.	Navajo Suburban Tier 1	2017	Very Low Income (12 units) Low Income (67 units)	Industrial structures were demolished to build 79 affordable units and one manager's unit.
Zephyr 4380 Alvarado Canyon Rd.	Navajo Suburban Tier 1	2017	Very Low Income (85 units)	An existing motel was repurposed into 85 affordable units for homeless veterans.
Stella 4304 Twain Ave.	Navajo Suburban Tier 1	2017	Very Low Income (79 units)	An industrial building was demolished to build 79 affordable units for veterans and one manager's unit.
Vista del Puente 3934 Gamma St.	Southeastern San Diego Urban Tier 2	2017	Very Low Income (43 units) Low Income (8 units)	A single family residence was demolished to build for 51 affordable units.
The Beacon 1425 C St.	Downtown Urban Core	2018	Very Low Income (44 units)	A 6-unit apartment building was demolished to build 44 affordable units.
Encanto Village 6317 Imperial Ave.	Encanto Neighborhoods Suburban Tier 1	2018	Very Low Income (8 units) Low Income (57 units)	A gas station and a commercial structure were demolished to build 65 affordable units.
Paseo la Paz 160 W. Seaward Ave.	San Ysidro Urban Tier 2	2018	Very Low Income (14 units) Low Income (123 units)	Three duplexes and four single-family residences were demolished to build 137 affordable units.

Project Name and Location	Community & Community Type	Permit Issued (Year)	Affordability	Project Description
San Ysidro Senior Village 517 W. San Ysidro Blvd.	San Ysidro Urban Tier 2	2018	Very Low Income (50 units)	A single family residence was demolished to build 50 affordable units.

## ASSEMBLY BILL (AB) 1397 REQUIREMENTS

Adopted in 2017, AB 1397 implemented new requirements for the adequate sites inventory regarding non-vacant sites that were identified in one previous Housing Element and vacant sites that were identified in two previous Housing Elements. In order to be eligible to be counted toward the City's lower income housing capacity, these sites must meet both of the following criteria:

- Zoned to allow a maximum residential density consistent with the City's default residential density of 30 dwelling units per acre
- Allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households
  - » Sites in the adequate sites inventory have been evaluated to identify whether they are subject to the AB 1397 requirements. Sites in communities where a Community Plan Update (including rezone) have been adopted during the 5th Cycle have been excluded from this analysis, because the zoning and development conditions for these sites have changed since the adoption of previous Housing Elements. Also, consistent with its methodology for determining lower-income housing suitability, the City has considered sites zoned for a maximum of 29 dwelling units per acre substantially equivalent to the City's default density of 30 dwelling units per acre. The results of this evaluation are indicated in the Adequate Sites Inventory Report in the column labeled "Subject to AB 1397 Review." In summary:
    - Non-vacant sites included in one prior Housing Element (2013 5th Cycle Housing Element): 127 sites
    - Vacant sites included in two prior Housing Elements (2013 5th Cycle Housing Element and 2005 4th Cycle Housing Element): 3 sites

Sites that are subject to the AB 1397 requirements have been further evaluated to identify whether they meet the criteria to be counted toward the City's lower income housing capacity. The results of this evaluation are indicated in the Adequate Sites Inventory Report in the column labeled "Meets AB 1397 Suitability Criteria." Six sites do not meet the AB 1397 criteria; these sites are therefore shown in the inventory report with zero net potential units (lower income). The sites, by community, are:

- Barrio Logan: 4 sites, 124 total net potential units
  - » Site ID BL3402, 55 net potential units
  - » Site ID BL3413, 25 net potential units
  - » Site ID BL3487, 22 net potential units
  - » Site ID BL3660, 22 net potential units
- Peninsula: 2 sites, 27 total net potential units
  - » Site ID PEN7589, 13 net potential units
  - » Site ID PEN10521, 14 net potential units

The above sites meet the default density suitability criterion but do not meet the affordable housing development by right criterion because they are located within the City's Coastal Overlay Zone (Municipal Code Chapter 13, Article 2, Division 4), which implements the California Coastal Act within the City of San Diego. While affordable housing development is permitted by right wherever residential uses are permitted within the City of San Diego, sites within the City's Coastal Overlay Zone are required to obtain a discretionary permit to verify the consistency of the proposed development with the California Coastal Act. Specifically: "Development, as defined by the California Coastal Act Section 30106, within the Coastal Overlay Zone requires a Coastal Development Permit decided by Process 2 (staff decision with discretion) or Process 3 (Hearing Officer decision), if the project is within the City of San Diego's permit jurisdiction area, or decided by the California Coastal Commission of the project site is within the Coastal Commission's permit jurisdiction area." For additional information, see Table 132-04A, Coastal Overlay Zone Applicability, accessible online at this link: <https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art02Division04.pdf>

## **SENATE BILL (SB) 330 REQUIREMENTS**

Adopted in 2019, SB 330 also implements new requirements applicable to the adequate sites inventory to conserve existing affordable housing units and units that are occupied by lower income households. Per SB 330, sites with existing residential units can't be counted toward the City's lower income capacity unless the City has adopted a mechanism to require replacement of existing units that are or units that within the last 5 years were affordable to low or very low income households or occupied by low or very low income households (referred to by SB 330 as "protected units"). The replacement requirements of SB 330 itself will provide one mechanism to require replacement until the replacement requirement within the law sunsets on January 1, 2025. In order to meet the requirements of SB 330 for the remainder of the Housing Element planning period after the sunset of the replacement requirement in Government Code Title 7 Division 1 Chapter 12, as part of the Annual Municipal Code Updates program, the City plans to amend its Municipal Code prior to January 1, 2025 to implement an ongoing requirement that all

units affordable to or occupied by a lower income household in the previous 5 years must be replaced in order to obtain a building permit.

## **SB 1333 REQUIREMENTS - “NO NET LOSS”**

Recent modifications to Housing Element law adopted through SB 1333, known as the “No Net Loss” provisions, require that the City maintain adequate capacity to accommodate the remaining unmet portion of its RHNA target for each of the income categories throughout the eight-year Housing Element planning period. The City must also monitor housing production as the planning period progresses, and ensure that the City does not reduce the housing capacity below what is needed to meet its RHNA target by income level through either (1) adoption of reductions in allowable residential densities for sites identified in the Adequate Sites Inventory through community plan update/amendment or rezone, or (2) approval of development or building permits for sites identified in the Inventory that authorize the construction or development of fewer units (by income level) than identified as possible in the Inventory. To address the intent of the “No Net Loss” provisions, in preparing its Adequate Sites Inventory, the City:

- Made conservative estimates of site housing capacity (90% of the net potential housing units based on the zone/land use designation)
- Identified enough sites with housing capacity to provide a substantial (61-62%) capacity buffer above its RHNA targets to ensure that the City maintains adequate capacity to meet its targets.

The City will also amend the procedures and requirements in its Land Development Manual to address the capacity analysis and approval findings required by State law. Also, the City will monitor its Adequate Sites Inventory regularly through the Housing Element period to ensure that the City maintains sufficient housing capacity; and will continue to update its community plans and zoning to identify opportunities to increase housing capacity in a manner consistent with the General Plan and Climate Action Plan.

## **DEVELOPMENT SITE ACCESS TO WATER, SEWER, AND DRY UTILITIES**

### **WATER AND SEWER**

Water and sewer facilities exist or are planned to accommodate residential and mixed-use development within the boundaries of the City of San Diego. The City’s Public Utilities Department (PUD) provides water and sewer service for the City of San Diego, with the exception of small areas that are served by adjacent water districts. The City plans needed water and sewer infrastructure, and the installation and maintenance of water and sewer pipelines and mains. New mains in previously undeveloped areas, such as Otay Mesa, and service lines are installed by developers/property owners as part of construction projects. With development in San Diego gradually shifting to be primarily infill, the need to construct additional water and sewer pipelines facilities is lower than in previous eras when development was

primarily occurring in previously undeveloped areas. In the unlikely event of a shortage in water supply or sewage capacity, affordable housing will be given priority for allocation, consistent with SB 1087.

The City plans for its water needs at the City level and the regional level. The City's 2015 Urban Water Management Plan (UWMP) is a long-range planning document for the City's water supply through 2035. It details the City's water system, water demands, sources of water supplies, water conservation efforts, climate change impacts, energy intensity, water shortage contingency planning, and projected water supply reliability during normal, dry, and multi-year drought conditions. The UWMP projects that the City's water service area population will increase at a rate of about 1 percent annually through 2040. The City receives most of its water from San Diego County Water Authority, which obtains water principally from the Metropolitan Water District of Southern California and transferred water from Imperial Irrigation District. The City also generates some water from local sources, and is in the process of implementing the Pure Water program to generate potable recycled water. The UWMP demonstrates that there will be sufficient water supplies to meet demands that are projected to occur by 2040.

At the regional level, the City also participates in the San Diego Integrated Regional Water Management Group. This group has created and regularly updates an Integrated Regional Water Management (IRWM) Plan. The 2019 IRWM Plan provides a mechanism for: 1) coordinating, refining and integrating existing planning efforts within a comprehensive, regional context; 2) identifying specific regional and watershed-based priorities for implementation projects; and 3) providing funding support for the plans, programs, projects and priorities of existing agencies and stakeholders.

In addition to requirements for long-term water planning, state law requires information on water supply availability and certain local land-use decisions. Water supply assessments are required for projects with 500 or more residential units subject to the California Environmental Quality Act (CEQA), including community plan updates. In addition, water supply verifications are required for large residential subdivisions to ensure water supplies to serve new large subdivisions. Water Supply Assessments have also been completed for the Environmental Impact Reports for all Community Plan Updates and Specific Plans adopted during the 2013-2020 Housing Element period. These assessments concluded that the City has adequate water capacity to serve planned development.

The City also has sufficient existing and planned sewer capacity to accommodate the City's portion of the Regional Housing Needs Assessment for the 6th cycle. The Wastewater branch of the City's PUD operates the Metropolitan Sewerage System (Metro System) which provides regional wastewater treatment and disposal for the City and 12 Participating Agencies. The system was designed to provide sufficient capacity to accommodate a regional population in excess of 2.5 million, and covers a 450-square-mile area including most of the City, stretching from Del Mar and Poway to the north, Alpine and Lakeside to the east, and south to San Ysidro. The Metro System consists of thousands of miles of sewer pipelines, wastewater treatment plants, conveyance facilities (including major pipelines and pump stations), two ocean outfalls, water reclamation plants, and a regional biosolids processing facility.

As part of any new development, the City analyzes if the existing infrastructure has adequate capacity to serve the project. If required, the developers/property owners would construct additional infrastructure to meet the needs of the proposed development.

## **DRY UTILITIES**

San Diego Gas & Electric (SDG&E) is the utility provider within the City of San Diego. As with water and sewer services, with development in San Diego gradually shifting to be primarily infill, new development will largely occur as infill in areas with existing utility infrastructure or in the few remaining newly developing areas that are located near developed areas with existing utility infrastructure.

## **FAIR HOUSING & ADEQUATE SITES**

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 seem 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 citizens of San Diego and the City as a whole. The City has mapped its adequate sites inventory in comparison to the following fair housing-related information:

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

The terms "minority concentration areas," "poverty concentration areas," and "racially and ethnically concentrated areas of poverty (R/ECAP)" are defined and discussed in detail in the San Diego County Regional Analysis of Impediments to Fair Housing Choice. 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>

Table HE-D-14 summarizes the data shown on the maps found in this section. The maps of lower income-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 HE-D-14. Adequate Sites & Fair Housing Considerations**

	All Areas	Minority Concentration Areas	Poverty Concentration Areas	R/ECAP Areas	CTCAC High and Highest Resource Areas
Total Sites	11,805	3,573	6,859	768	5,722
Sites (% of Total)	--	30.2%	58.1%	6.5%	48.5%
Total Net Potential Units	174,678	59,006	89,002	9,121	86,592
Net Potential Units (% of Total)	--	33.8%	50.1%	5.2%	49.6%
Lower-Income Suitable Sites <sup>1</sup>	1,036	437	595	43	375
Lower-Income Suitable Sites <sup>1</sup> (% of Total)	8.8%	42.2%	57.4%	4.2%	36.2%
Lower-Income Net Potential Units <sup>2</sup>	72,191	29,848	37,975	3,959	30,490
Lower-Income Net Potential Units <sup>2</sup> (% of Total)	41.3%	41.3%	52.6%	5.5%	2.2%

<sup>1</sup> 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.

<sup>2</sup> 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 Lower Income Housing Potential: Figure HE-D-2**

Compared to the City’s inventory of sites and net potential units as a whole, more lower income suitable sites and lower income net potential housing units (12% and 7.5% more, respectively) are located in minority concentration areas. Concentrations of lower income sites and housing units in minority concentration areas are found in the Otay Mesa, Encanto, Mission Valley, Navajo, and Kearny Mesa communities. These concentrations are due to the larger parcel sizes and concentrations of higher density-zoned sites in transit priority areas in these communities, which are consistent with the lower income housing suitability criteria in state law.



### **Poverty Concentration Areas and Lower Income Housing Potential: Figure HE-D-3**

Compared to the City's inventory of sites and net potential units as a whole, 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 sites and 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 housing units in poverty concentration areas is likely due to the concentrations of higher density-zoned sites in transit priority areas in these communities.

### **R/ECAP Areas and Lower Income Housing Potential: Figure HE-D-4**

Compared to the City's inventory of sites and net potential units as a whole, fewer lower income suitable sites (2.3% fewer) and substantially the same amount of lower income net potential housing units (0.3% more) are located in R/ECAP areas. Concentrations of lower income sites and housing units in R/ECAP areas are found in the Encanto, Southeastern San Diego, Downtown, and Mid-City: City Heights communities.

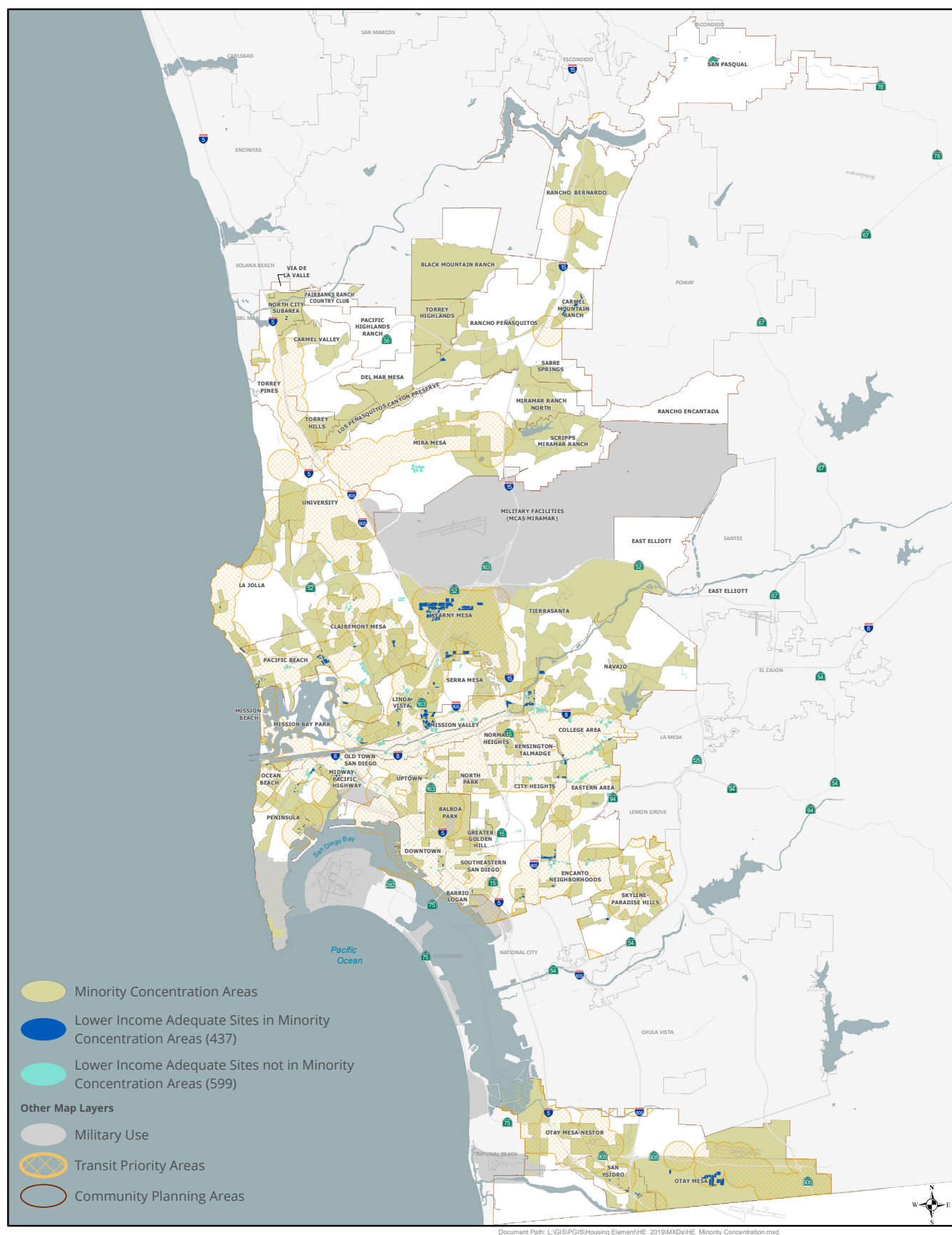
### **CTCAC High & Highest Resource Areas and Lower Income Housing Potential: Figure HE-D-5**

Compared to the City's inventory of sites and net potential units as a whole, fewer lower income suitable sites and lower income net potential housing units (12.3% and 7.3% 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 concentrations of higher density-zoned sites in transit priority areas in these communities, which are consistent with the lower income housing suitability criteria in state law. 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 are likely to increase opportunities for lower-income housing in these communities, will include rezoning of sites, and are anticipated to be completed during the 6th Housing Element cycle.

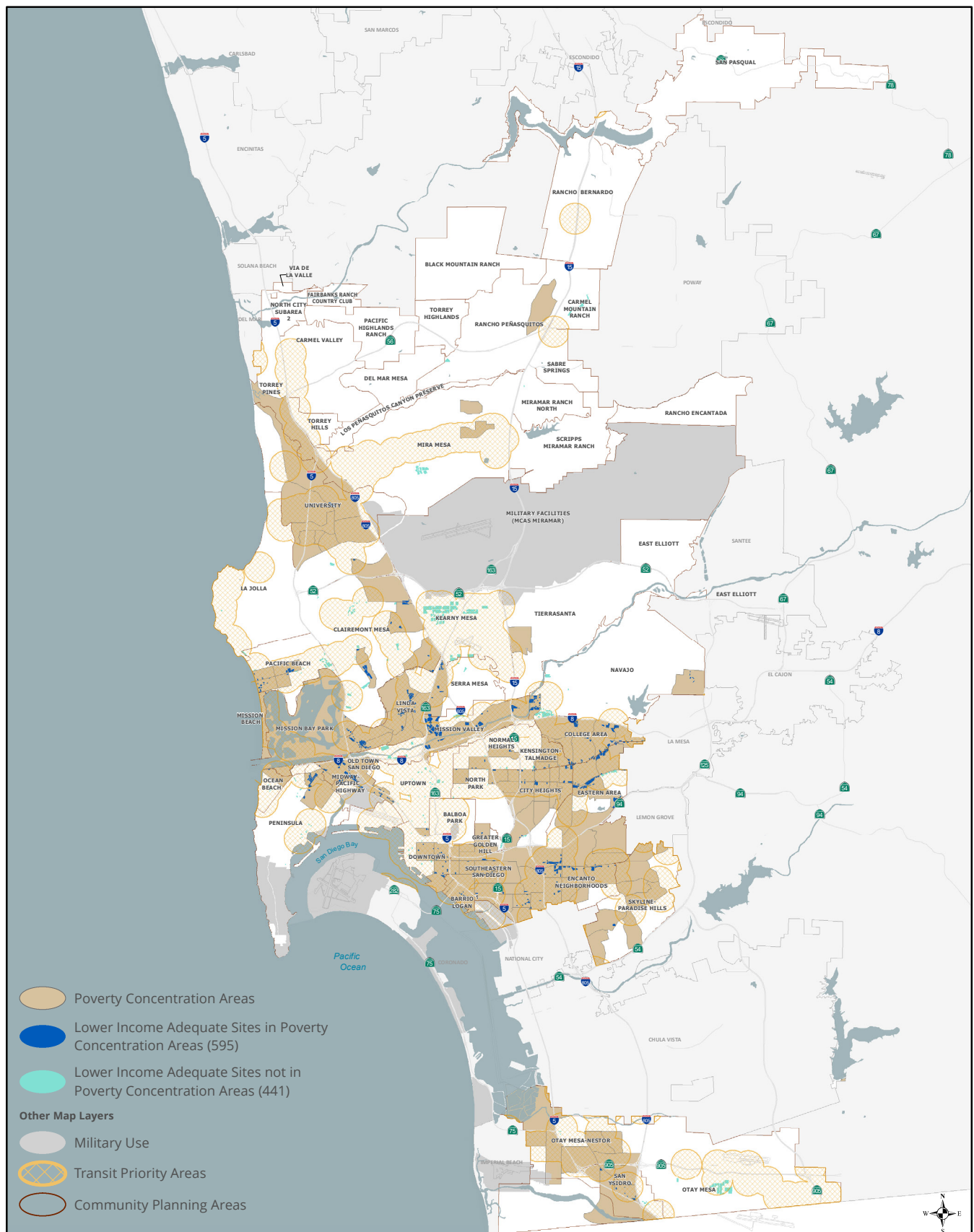
### **Existing Affordable Housing and Lower Income Housing Potential: Figure HE-D-6**

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

**Figure HE-D-2. Location of Lower-Income Suitable Adequate Sites Compared to Minority Concentration Areas**

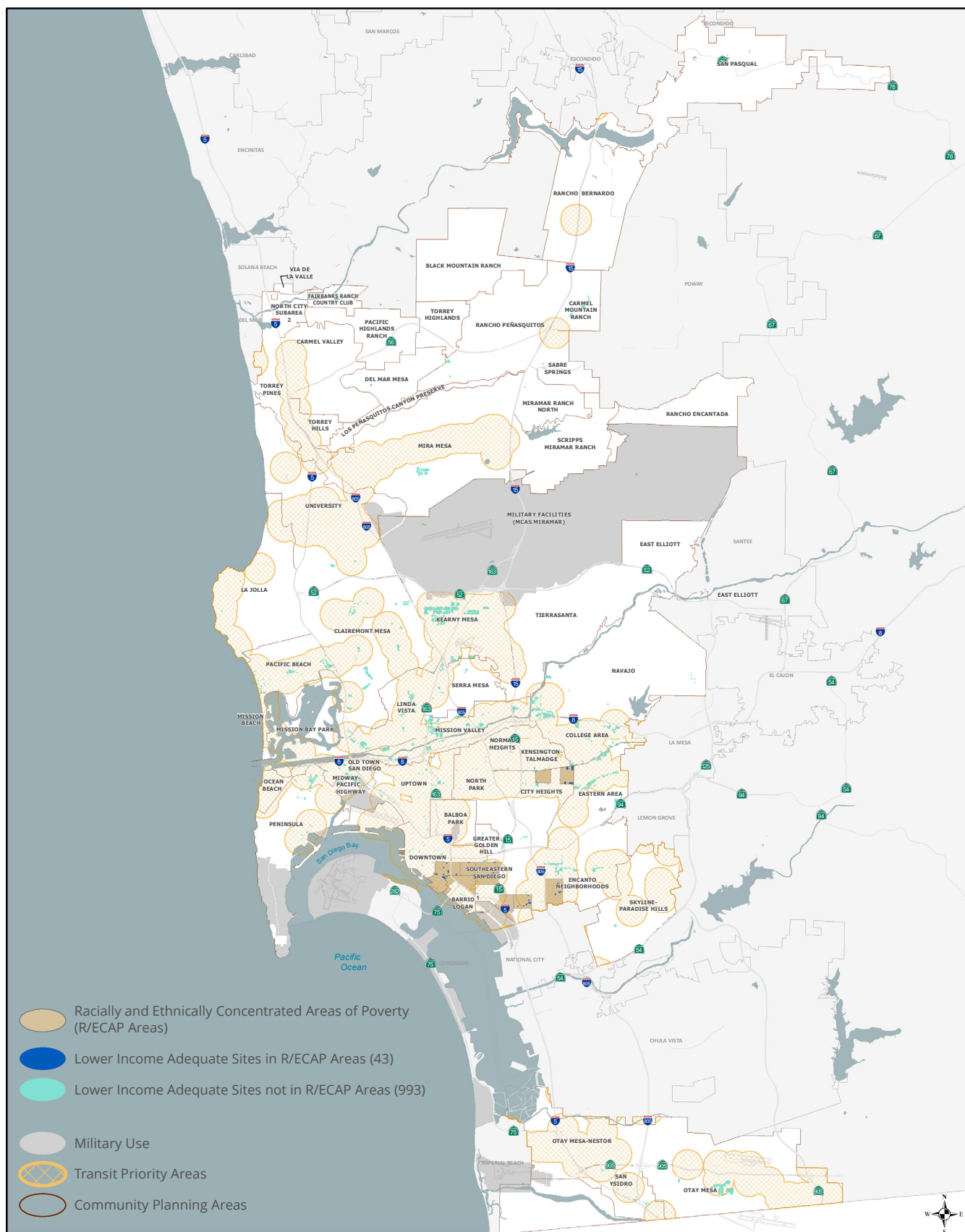


**Figure HE-D-3. Location of Lower-Income Suitable Adequate Sites Compared to Poverty Concentration Areas**

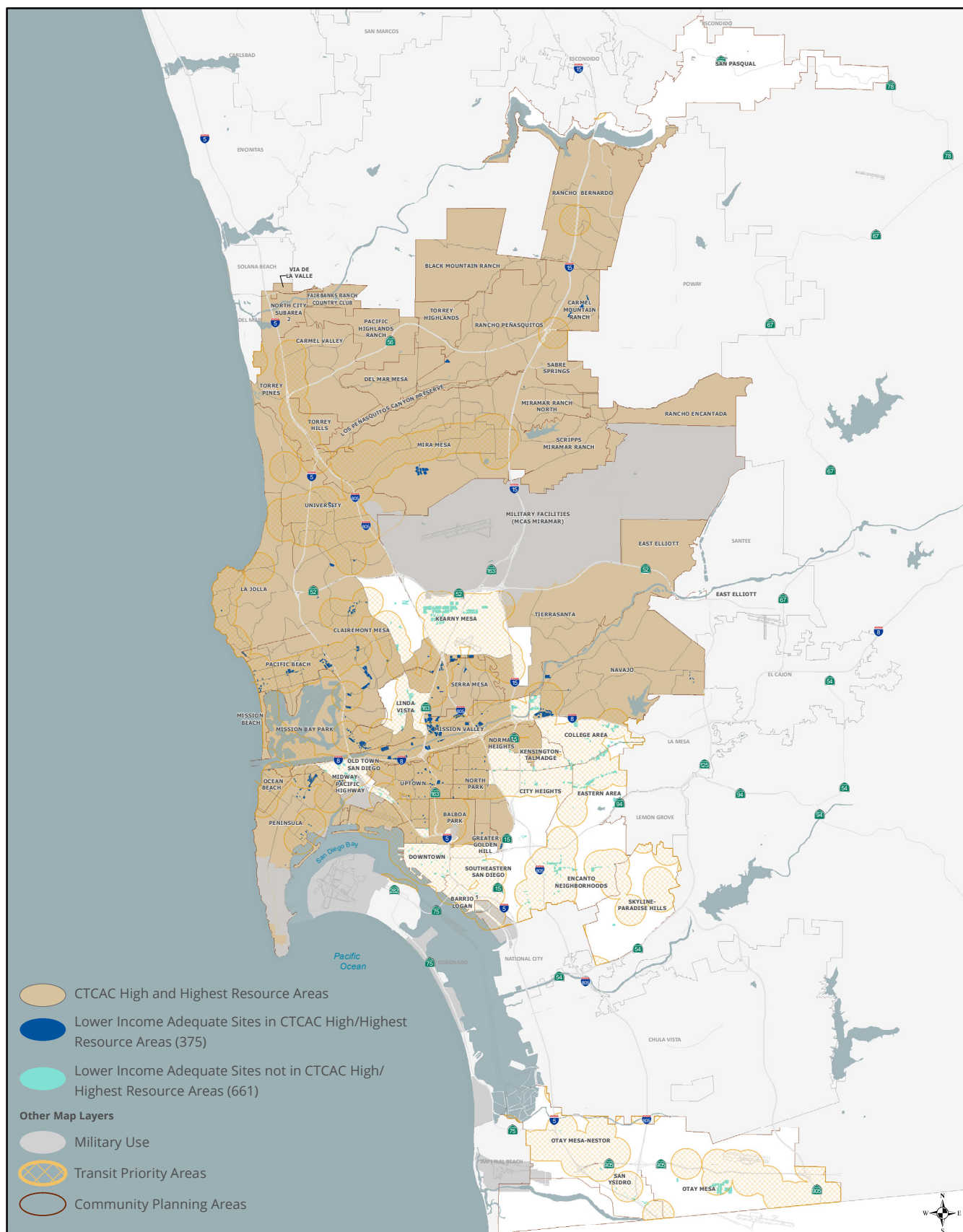




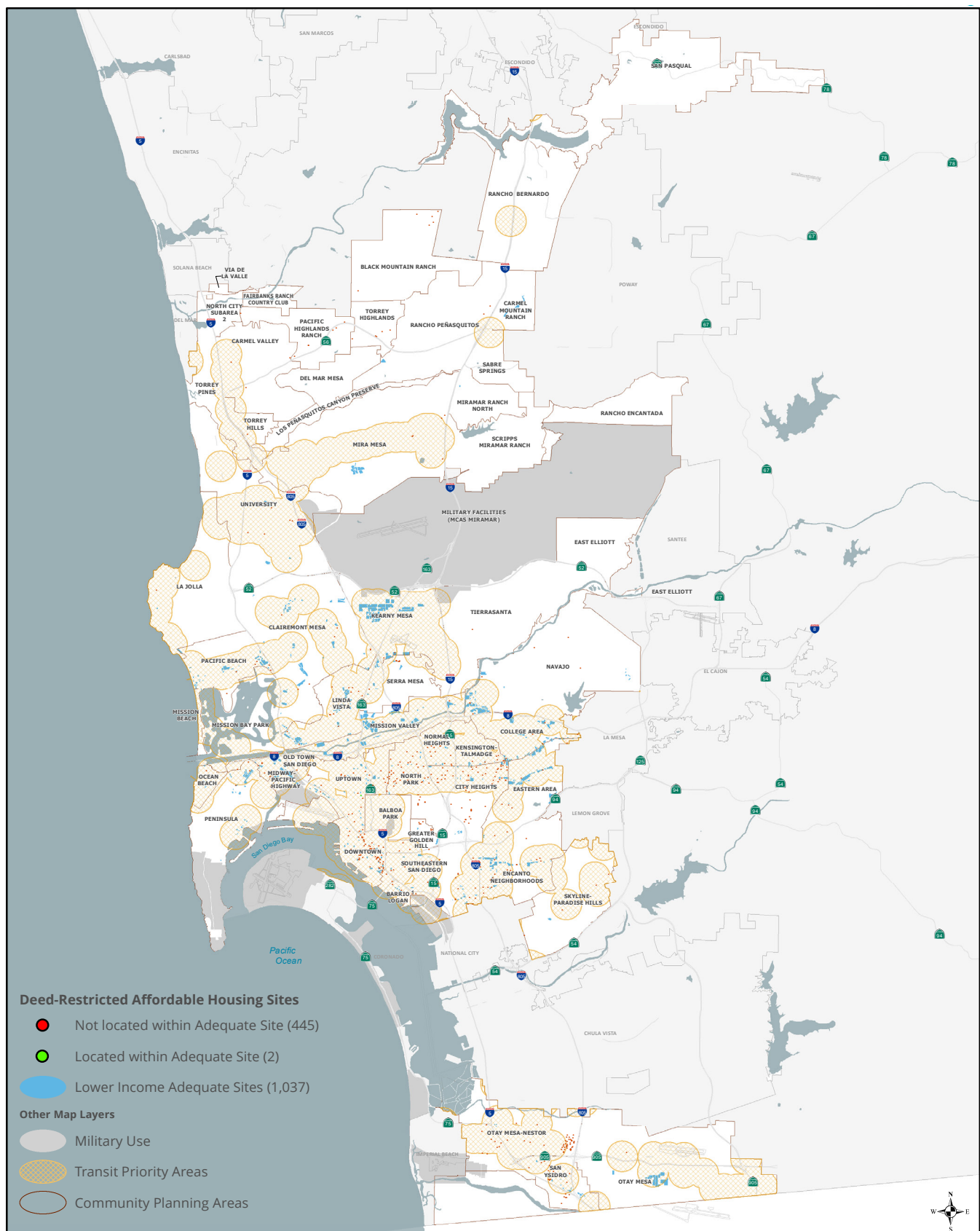
**Figure HE-D-4. Location of Lower-Income Suitable Adequate Sites Compared to Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)**



**Figure HE-D-5. Location of Lower-Income Suitable Adequate Sites Compared to CTCAC High and Highest Resource Areas**



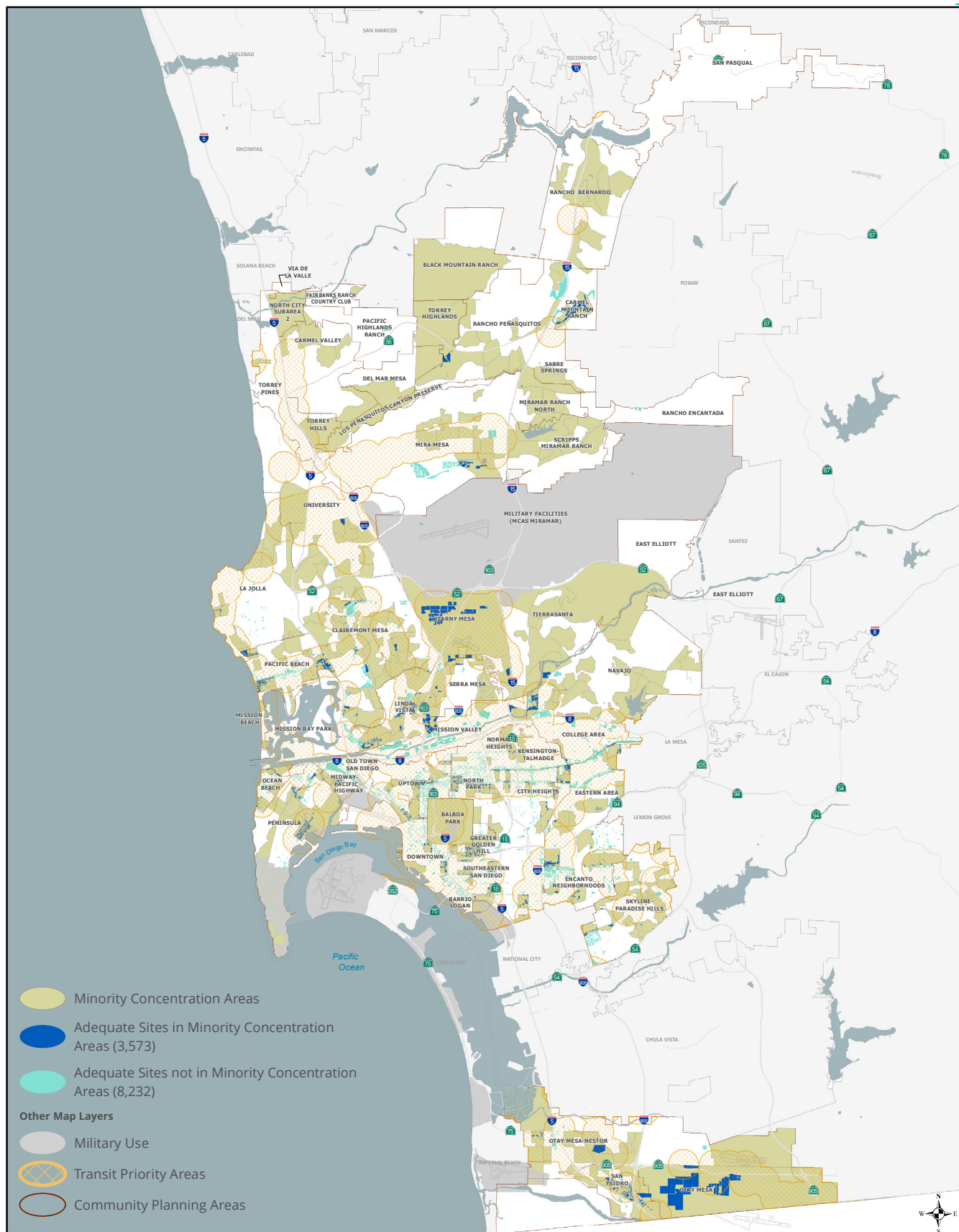
**Figure HE-D-6. Location of Lower-Income Suitable Adequate Sites Compared to Existing Deed-Restricted Affordable Housing**



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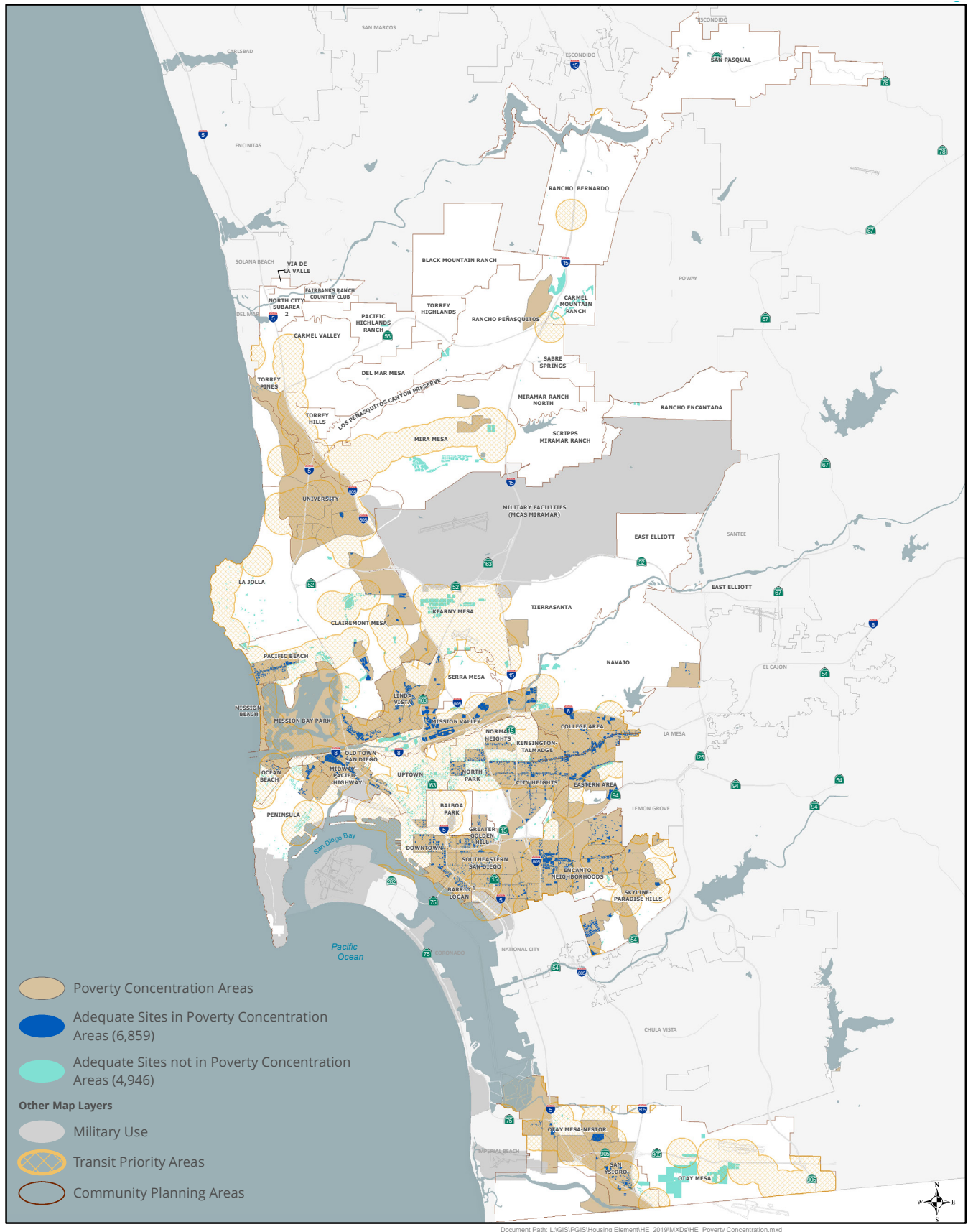


**Figure HE-D-7: Location of Adequate Sites Compared to Minority Concentration Areas**

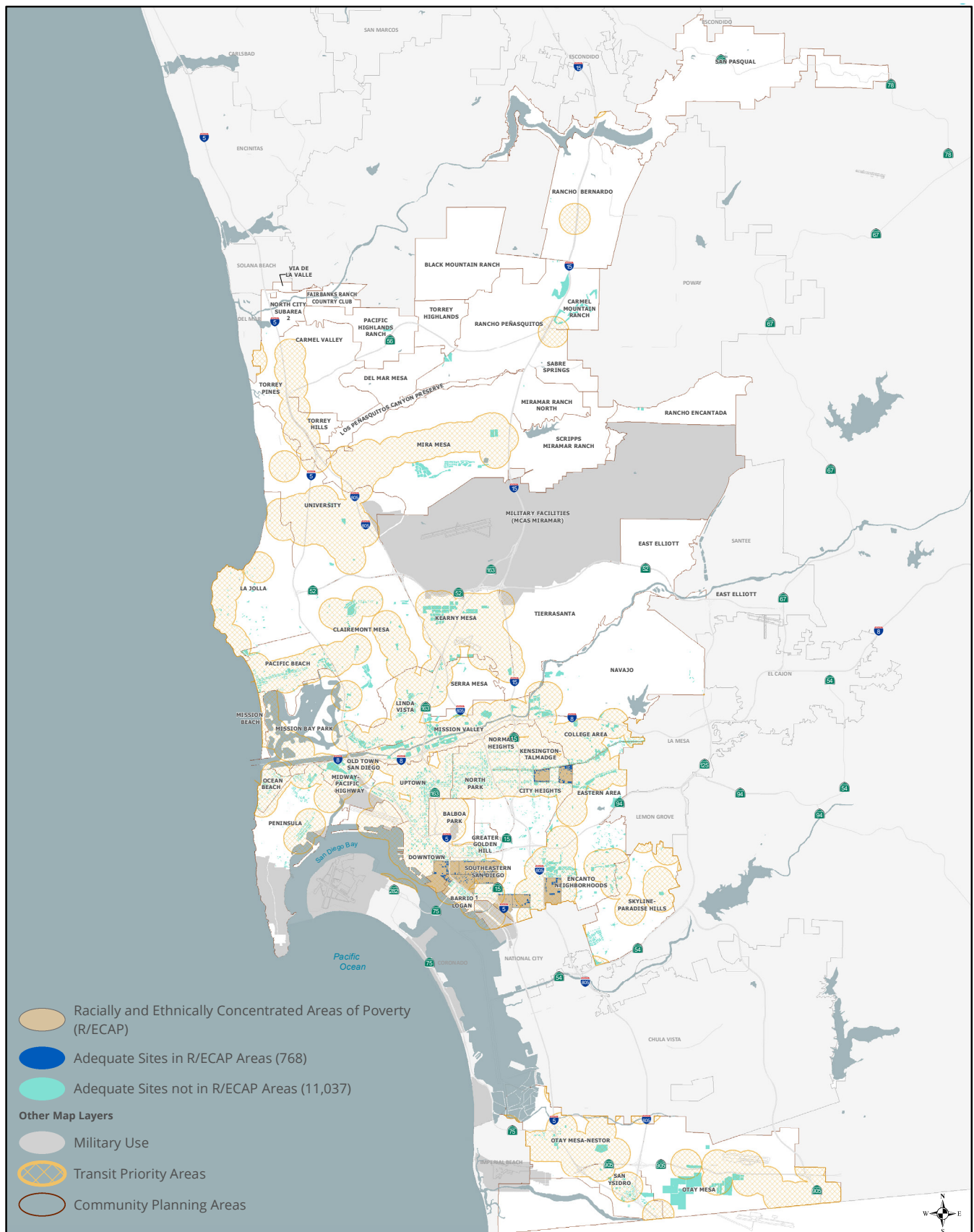




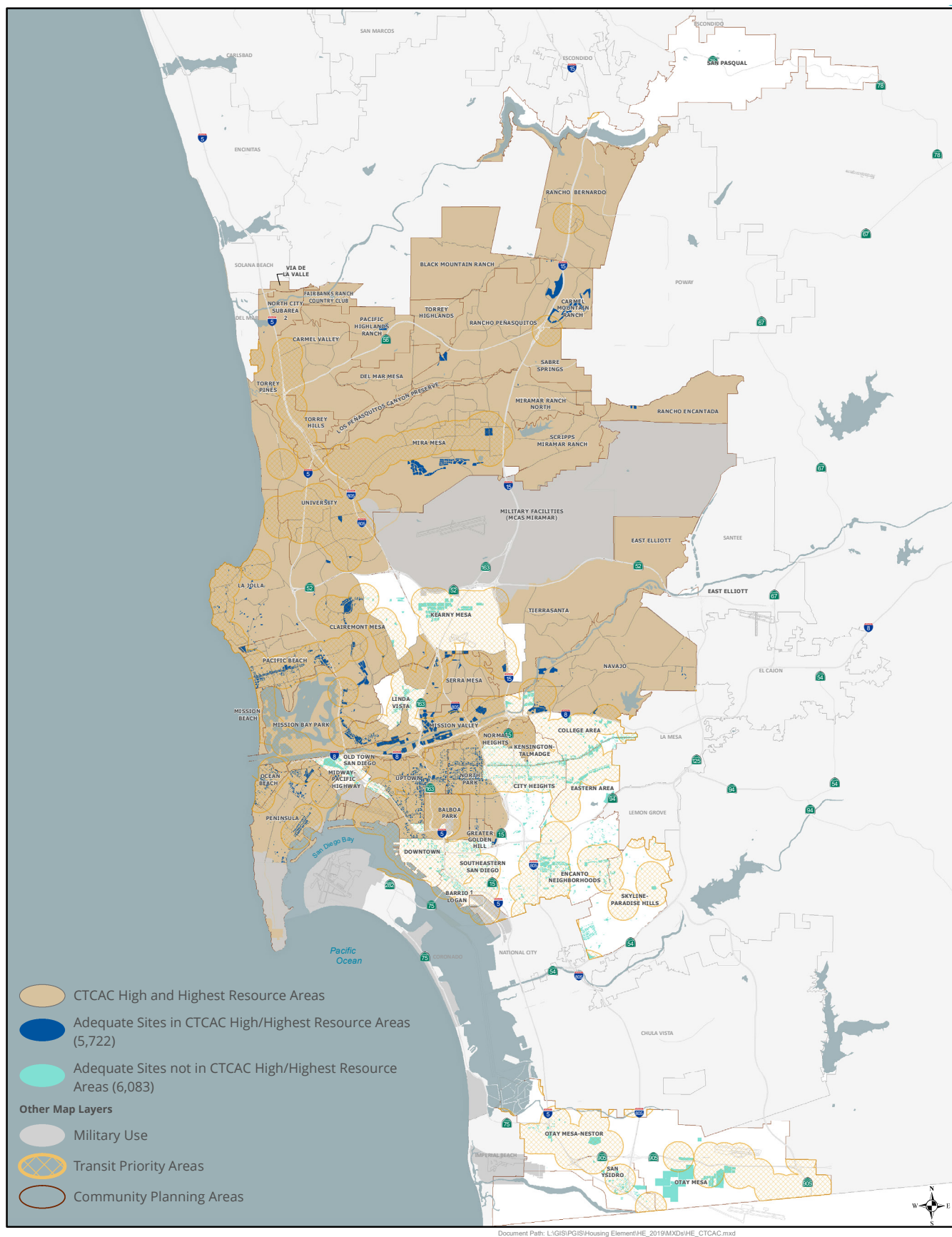
**Figure HE-D-8: Location of Adequate Sites Compared to Poverty Concentration Areas**



**Figure HE-D-9. Location of Adequate Sites Compared to Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)**



**Figure HE-D-10. Location of Adequate Sites Compared to CTCAC High and Highest Resource Areas**





**Figure HE-D-11. Location of Adequate Sites Compared to Existing Deed-Restricted Affordable Housing**

