San Diego Regional Analysis of Impediments to Fair Housing Choice

May 2020

Prepared on behalf of the
San Diego Regional Alliance for Fair Housing
http://www.sdfairhousing.org/

Participating Jurisdictions

City of Carlsbad
City of Chula Vista
City of Coronado
City of Del Mar
City of El Cajon
City of Encinitas
City of Escondido
City of Imperial Beach
City of La Mesa
City of Lemon Grove
City of National City
City of Oceanside
City of Poway
City of San Diego
City of San Marcos
City of Santee
City of Solana Beach
City of Vista
Unincorporated County

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ES EXECUTIVE SUMMARY

AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

San Diego County boasts an estimated population of over three million residents, making it the second most populous county in California, and fifth in the nation. Diversity among its residents, in terms of cultural backgrounds and socioeconomic characteristics, makes San Diego County a desirable area to live. To continue nurturing this diversity, civic leaders must ensure that an environment exists where equal access to housing opportunities is treated as a fundamental right.

Purpose of the Analysis of Impediments

The communities within San Diego County have established a commitment to providing equal housing opportunities for their existing and future residents. This report, the Analysis of Impediments to Fair Housing Choice (commonly 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.

Participating Jurisdictions

The AI covers the entirety of San Diego County, including the 18 incorporated cities and all unincorporated areas:

- City of Carlsbad
- City of Chula Vista
- City of Coronado
- City of Del Mar
- City of El Cajon
- City of Encinitas
- City of Escondido
- City of Imperial Beach
- City of La Mesa
- City of Lemon Grove
- City of National City
- City of Oceanside
- City of Poway
- City of San Diego
- City of San Marcos
- City of Santee
- City of Solana Beach
- City of Vista
- Unincorporated County

Community Outreach

The San Diego Regional Alliance for Fair Housing (SDRAFFH), comprised of representatives from the participating jurisdictions listed above, fair housing professionals, and housing advocates, helped coordinate the development of the AI, especially the outreach process.

Community Workshops

Six community workshops were held in communities throughout the County in October and November 2019 to gather input regarding fair housing issues in the region. The locations and dates of the workshops were as follows:

Area of County	Location	Date
Central Region	LISC San Diego, San Diego, CA	October 30, 2019
Eastern Region	El Cajon Police Department, El Cajon, CA	November 6, 2019
Northern Region	Escondido City Hall, Escondido, CA	November 7, 2019
Central Region	Valencia Park/Malcolm X Library	November 13, 2019
Southern Region	Chula Vista City Hall, Chula Vista, CA	November 20, 2019
Southern Region	MLK Jr. Community Center, National City, CA	November 21, 2019

During the community workshops, several recurring comments were recorded:

1. Individuals and families in the following protected classes shared experiences of housing discrimination:

    - Homeless
    - Sexual orientation
    - Individual with an emotional support animal
    - Family with deported father
    - Women with adopted children
    - Families with children with autism
    - Source of income or type of work

2. 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.
3. Need to improve how information is provided to community members by relating messaging to people's lives, letting people know they will learn something, simplifying language and documents.
4. Need to make sure that there are representatives at different agencies and providers that can communicate in different languages of local community.

Stakeholder Interviews

In addition to the input given by representatives from local organizations in attendance at the community workshops, key stakeholders were contacted for one-on-one interviews about the AI. Participants represented organizations that provide fair housing services and/or complementary and

related support services. A representative from each of the following organizations participated in a telephone interview:

Stakeholder	Contact
Alliance for Regional Solutions	Mary Lynn McCorkle, Collaborations Manager October 30, 2019
CSA San Diego	Estela De Los Rios, Executive Director November 6, 2019
Elder Help San Diego	Robin Strickland, Housing Services Coordinator November 7, 2019
La Maestra Community Health Centers	John Kuek, Director of Integrated Community Services November 13, 2019
Legal Aid Society of San Diego County	Rosalina Spencer, Lead Lawyer November 20, 2019
National Alliance on Mental Illness	Aaron Basila, Community Outreach Worker November 21, 2019
Regional Task Force on the Homeless	Jennifer Yost, Director of Grants Management
San Diego Housing Federation	Laura Nunn, Director of Policy and Programs
Southern California Rental Housing Association	Molly Kirkland, Director of Public Affairs

The following summary of findings reflects collective input from the interviewees:

1. 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
    - Language barriers

2. Common fair housing misconceptions and misunderstandings include:

    - Difficult or complex laws and requirements, different requirements for different programs, and difficulty navigating process
    - Not understanding role of different agencies or service providers
    - Terminology and different definitions or understanding of terms like discrimination, affordable housing, intent, or eviction
    - Lack of understanding about different individuals or people who are homeless, suffering from mental illness, live in permanent supportive housing

Fair Housing Survey

The survey was available in multiple languages, including English, Spanish, Tagalog, Chinese, Arabic, and Vietnamese on the websites of the County and all participating jurisdictions. Hard copies of the survey were provided to a number of local agencies for distribution to their clients. The community

workshop flyer, including links to the online survey, was mailed to over 1,000 housing and service providers, encouraging them to provide their unique perspective by participating in the Community Needs Survey. A total of 1,132 persons responded to the Housing Discrimination Survey. The majority of survey respondents felt that housing discrimination was not an issue in their neighborhoods. There were 305 persons who answered "YES" to whether they have personally experienced discrimination in housing.

Community Profile

Population Growth

Examination of demographic characteristics provides some insight regarding the need and extent of equal access to housing in a community. Overall, San Diego County experienced a 10 percent increase in population from 2000 to 2010. From both 2000 to 2010 and 2010 to 2019, the cities of San Marcos, Chula Vista, and Carlsbad had the largest growth. All cities experienced a population growth in the last decade except for the city of Coronado, whose population dropped by two percent. The median age in San Diego County is increasing steadily. Based on the 2017 American Community Survey, 12.9 percent of the population in San Diego County was age 65 or over (seniors), with another 11.6 percent in the 55 to 64 age group (future seniors).

Race/Ethnicity

San Diego County's residents have become increasingly diverse in their race and ethnic compositions since 1970. 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.

Race and Ethnic Concentration

A significant portion of San Diego County's population is also foreign born. According to the 2013-2017 ACS, one-fourth of the county's population is foreign born and almost 90 percent of them are from non-European countries. About half of foreign-born residents in the county are from Latin America and a large portion of immigrants are from Asian countries (38 percent).

Housing Age and Condition

Assessing housing conditions in the County can provide the basis for developing policies and programs to maintain and preserve the quality of the housing stock. Housing age can indicate general housing conditions within a community. The housing stock in the San Diego region is older, with a majority of the housing units (54 percent) built before 1979 and is at least 40 years old (Table 36). The highest percentages of pre-1980 housing units are generally found in the older, urbanized neighborhoods of the cities of La Mesa, Lemon Grove, El Cajon, San Diego, Coronado and National City and will most likely have the largest proportions of housing units potentially in need of rehabilitation. Home rehabilitation can be an obstacle for senior homeowners with fixed incomes and mobility issues.

Housing Cost and Affordability

The cost of homeownership varies within San Diego County depending on the community. In 2019, the median sales price for homes in San Diego County was $594,909, an increase of 38 percent from 2014. Home prices vary by area/jurisdiction, with very high median prices in coastal areas such as the

cities of Coronado, Del Mar, and Solana Beach. Imperial Beach and Lemon Grove had the lowest median sales price in the region. 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.

Adverse Community Factors

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology, called the California Communities Environmental Health Screening Tool (CalEnviroScreen), to help identify California communities that are disproportionately burdened by multiple sources of pollution. The CalEnviroScreen reveals that high scoring communities tend to be more burdened by pollution from multiple sources and most vulnerable to its effects, taking into account their socioeconomic characteristics and underlying health status. In San Diego County, the areas indicated as having higher EnviroScreen scores generally match the geographic distribution of minorities, low- and moderate-income persons, and poverty concentrations.

Lending Practices

Overall Lending Patterns

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent lending/credit crisis. In 2017, a total of 37,949 households applied for conventional loans to purchase homes in San Diego County, representing an increase of approximately 41 percent from 2012. This trend is indicative of a housing market that is slowly recovering from its peak in 2006-2007. The loan approval rates varied somewhat by jurisdiction. Applications from the cities of Carlsbad, La Mesa, Poway and Santee generally exhibited higher approval rates (over 67 percent). By contrast, applications from the cities of National City, Imperial Beach, and Chula Vista had slightly lower approval rates (ranging from 57 percent to 61 percent). In 2012, the cities of La Mesa, Carlsbad, and Poway recorded the highest home loan approval rates; these approval rates ranged from 74 to 76 percent. The cities with the lowest loan approval rates were the same in 2012 as in 2017 (Imperial Beach, Chula Vista, and National City, under 65 percent). Aside from income, another major impediment to securing a home loan is insufficient understanding of the homebuying and lending processes. About 14 percent of all applications countywide were withdrawn by the applicants or deemed incomplete by the financial institution in 2012. The rate of withdrawn or incomplete applications was higher in 2017 (21 percent).

Lending by Race/Ethnicity

In an ideal 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. 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), and Imperial Beach (-30 percent).

Top Lenders

In 2017, about 38 percent (39,017 applications) of all loan applications in San Diego County were submitted to one of the County's top ten lenders. The top two lenders in the county in 2017 were Wells Fargo Bank and JP Morgan Chase Bank.

Subprime Lending

Subprime lending can both impede and extend fair housing choice. While Home Mortgage Disclosure Act (HMDA) data does not classify loans as subprime, it does track the interest rate spread on loans. In 2005, the Federal Reserve Board required lenders to report rate spreads for loans whose Annual Percentage Rate (APR) was above the U.S. Department of the Treasury benchmark. Loans with a reported spread are typically referred to as higher-priced or subprime loans. The number of subprime loans issued has decreased substantially over time. In 2012, approximately one percent of all loans issued had a reported spread but, by 2017, almost four percent of loans issued were subprime loans. What appears to be most troubling, however, is that Black and Hispanic applicants seem to be significantly more likely to receive these higher-priced loans. In 2012 and 2017, Blacks and Hispanics were twice as likely as Asians to receive a subprime loan. White applicants utilizing subprime loans were limited.

Public Policies

Housing Element Compliance

Public policies established at the regional and local levels can affect housing development and therefore, may have an impact on the range and location of housing choices available to residents. A Housing Element found by the State Department of Housing and Community Development (HCD) to be in compliance with State law is presumed to have adequately addressed its policy constraints. According to HCD, all 19 Housing Elements for participating jurisdictions (including the County) for the fifth cycle (2013-2020) are in compliance.

Zoning Amendments to Remove Impediments to Special Needs Housing

As part of the 2013-2021 Housing Element update, most jurisdictions have already addressed the provisions for special needs housing. However, some jurisdictions in the region have yet to address issues such as:

- Density bonus
- Residential care facilities
- Farmworker housing
- Employee housing

Fair Housing Data

Two agencies provided fair housing services to San Diego County residents: CSA San Diego County (CSA) and Legal Aid Society of San Diego (LASSD).

CSA San Diego County (CSA): Between FY 2014 and FY 2018, CSA provided fair housing services to approximately 1,000 San Diego County residents per year—for a total of 6, 276 clients over the five-year period. The majority of CSA's clients during this period came from El Cajon (35 percent), Chula Vista (21 percent), and the unincorporated County.

Legal Aid Society of San Diego (LASSD): Between FY 2014 and FY 2018, LASSD served over 19,000 San Diego County residents. The majority of LASSD client households during this five-year time period resided in the City of San Diego (53 percent), El Cajon (nine percent) and Oceanside (eight percent).
In addition, fair housing complaints were filed with HUD and with the State Department of Fair Employment and Housing (DFEH) for investigation and enforcement:

HUD: From October 1, 2014 to September 30, 2019, 414 fair housing complaints in San Diego County were filed with HUD (Table 10). About 44 percent of complaints filed were from residents of the City of San Diego. A fair number of complaints were also filed from residents of Oceanside (11 percent) and Chula Vista (seven percent).

Overall, disability-related discrimination was the most commonly reported—comprising 53 percent of all cases (Table 11). Complaints concerning race (12 percent), retaliation (10 percent), and familial status (nine percent) were also regularly reported. Half of all complaints filed (50 percent or 206 cases) were deemed to have no cause and another 28 percent (115 cases) were conciliated or settled.

Fair Housing Impediments

Based on the analysis conducted for this AI, the following is a preliminary list of fair housing impediments identified in San Diego County:

- **Outreach and Education:** Fair housing education is identified as one of the most important strategies for furthering fair housing. However, traditional outreach methods of publishing notices and press releases in newspapers and posting information on websites are not adequate to reach the general public with diverse needs and interests. Outreach methods should be expanded to include other media of communications, and also utilize networks of neighborhood groups and organizations.
- **Enforcement:** Rigorous enforcement of fair housing laws is most effective in deterring housing discrimination. However, not enough enforcement activities are pursued. Fair housing service providers should encourage victims to pursue litigation and refer victims to agencies and organizations with the capacity to handle litigation. Also, favorable outcomes in litigation should be publicized to encourage other victims to come forward.
- **Linguistic Isolation:** 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.

- **Segregation:** Within San Diego County, there are RECAPs (Racially/Ethnically Concentrated Areas of Poverty) 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.
- **Lending:** Throughout San Diego County, White applicants were noticeably overrepresented in the loan applicant pool, while Hispanics were severely underrepresented. Black and Hispanic applicants also seem to be significantly more likely to receive subprime loans. The SDRAFFH and jurisdictions should meet with the lending community to discuss ways to expand access to financing for all but especially for minority households.
- **Public Policies:** Several jurisdictions within the County have yet to update their zoning ordinances to address recent changes to State Law. Jurisdictions should implement their Housing Element program commitments to amend the zoning ordinances in a timely manner.

CHAPTER 1 INTRODUCTION

AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

San Diego County, one of the most populous counties in the nation, is home to over 3 million residents and an increasingly diverse demographic. The County encompasses 18 incorporated cities and more than 25 rural and urban unincorporated neighborhoods and communities.

Diversity among its residents, in terms of cultural backgrounds and socioeconomic characteristics, makes San Diego County a desirable area to live. To continue nurturing this diversity, civic leaders must ensure that an environment exists where equal access to housing opportunities is treated as a fundamental right.

A. Purpose of Report

The communities within San Diego County have established a commitment to providing equal housing opportunities for their existing and future residents. Through the federally funded Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs, among other state and local programs, the jurisdictions of San Diego County work to provide a decent living environment for all.

Pursuant to CDBG regulations [24 CFR Subtitle A §91.225(a)(1)], to receive CDBG funds, a jurisdiction must certify that it "actively furthers fair housing choice" through the following:

- Completion of an Analysis of Impediments to Fair Housing Choice (AI);
- Actions to eliminate identified impediments; and
- Maintenance of fair housing records.

In 2016, HUD passed the Affirmatively Furthering Fair Housing (AFFH) Rule that would have required the preparation of an Assessment of Fair Housing under the new rule. However, due to extensive comments from grantees, HUD suspended the AFFH Rule in 2018 and is currently working on amending the rule with simplified requirements. In the meantime, fair housing requirements revert to the 1996 Fair Housing Planning Guide prepared by HUD.

This report, the Analysis of Impediments to Fair Housing Choice (commonly known as the "AI"), presents a demographic profile of the County of San Diego, assesses the extent of fair housing issues among specific groups, and evaluates the availability of a range of housing choices for all residents. This report 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.

B. Geographic Area Covered

The AI covers the entirety of San Diego County, including the 18 incorporated cities and all unincorporated areas:

- City of Carlsbad
- City of Chula Vista
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- City of Imperial Beach
- City of La Mesa
- City of Lemon Grove
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- City of Oceanside
- City of Poway
- City of San Diego
- City of San Marcos
- City of Santee
- City of Solana Beach
- City of Vista
- Unincorporated County

C. Fair Housing Legal Framework

Fair housing is a right protected by both Federal and State of California laws. Among these laws, virtually every housing unit in California is subject to fair housing practices.

1. Federal Laws

The Fair Housing Act of 1968 and Fair Housing Amendments Act of 1988 (42 U.S. Code §§ 3601-3619, 3631) are federal fair housing laws that prohibit discrimination in all aspects of housing, including the sale, rental, lease, or negotiation for real property. The Fair Housing Act prohibits discrimination based on the following protected classes:

- Race or color
- Religion
- Sex
- Familial status
- National origin
- Disability (mental or physical)

Specifically, it is unlawful to:

- Refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, disability, familial status, or national origin.
- Discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, sex, disability, familial status, or national origin.
- Make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference,

limitation, or discrimination based on race, color, religion, sex, disability, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.

- Represent to any person because of race, color, religion, sex, disability, familial status, or national origin that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.
- For profit, induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, disability, familial status, or national origin.

Reasonable Accommodations and Accessibility

The Fair Housing Amendments Act requires owners of housing facilities to make "reasonable accommodations" (exceptions) in their rules, policies, and operations to give people with disabilities equal housing opportunities. For example, a landlord with a "no pets" policy may be required to grant an exception to this rule and allow an individual who is blind to keep a guide dog in the residence. The Fair Housing Act also 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, at the tenant's own expense. Finally, the Act requires that new multi-family housing with four or more units be designed and built to allow access for persons with disabilities. This includes accessible common use areas, doors that are wide enough for wheelchairs, kitchens and bathrooms that allow a person using a wheelchair to maneuver, and other adaptable features within the units.

HUD Final Rule on Equal Access to Housing in HUD Programs

On March 5, 2012, the U.S. Department of Housing and Urban Development (HUD) published the Final Rule on "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity." It applies to all McKinney-Vento-funded homeless programs, as well as to permanent housing assisted or insured by HUD. The rule creates a new regulatory provision that generally prohibits considering a person's marital status, sexual orientation, or gender identity (a person's internal sense of being male or female) in making homeless housing assistance available.

2. California Laws

The State Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The **Fair Employment and Housing Act** (FEHA) (Government Code Section 12955 et seq.) prohibits discrimination and harassment in housing practices, including:

- Advertising
- Application and selection process
- Unlawful evictions
- Terms and conditions of tenancy
- Privileges of occupancy
- Mortgage loans and insurance

- Public and private land use practices (zoning)
- Unlawful restrictive covenants

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex
- Marital status
- Source of income
- Sexual orientation
- Familial status (households with children under 18 years of age)
- Religion
- Mental/physical disability
- Medical condition
- Age
- Gender Identity
- Gender Expression
- Genetic Information

In October 2019, the California Legislature passed SB 329 and SB 222, expanding the Source of Income protection to include "federal, state, or local public assistance and federal, state, or local housing subsidies." Prior to these bills, Source of Income protection excluded public housing subsidies, such as the Housing Choice Vouchers, in the definition of income. Both bills went into effect on January 1, 2020.

In addition, the FEHA contains similar reasonable accommodations and accessibility provisions as the federal Fair Housing Amendments Act.

The **Unruh Civil Rights Act** provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists "sex, race, color, religion, ancestry, national origin, disability, and medical condition" as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics.

Furthermore, the **Ralph Civil Rights Act** (California Civil Code Section 51.7) forbids acts of violence or threats of violence because of a person's race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute. Hate violence can be: verbal or written threats; physical assault or attempted assault; and graffiti, vandalism, or property damage.

The **Bane Civil Rights Act** (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act are not allowed for speech alone unless that speech itself threatened violence.

And, finally, **California Civil Code Section 1940.3** prohibits landlords from questioning potential residents about their immigration or citizenship status. Landlords in most states are free to inquire about a potential tenant's immigration status and to reject applicants who are in the United States illegally.[1] In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person's citizenship or immigration status.

In addition to these laws, Government Code Sections 111135, 65008, and 65580-65589.8 prohibit discrimination in State-funded programs and in land use decisions. Specifically, recent changes to Sections 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including permanent supportive housing for the disabled and housing for the homeless.

D. Fair Housing Defined

In light of the various pieces of fair housing legislation passed at the Federal and State levels, fair housing throughout this report is defined as follows:

> *A condition in which individuals of similar income levels in the same housing market have a like range of choice available to them regardless of their characteristics as protected under State and Federal laws.*

1. Housing Issues, Affordability, and Fair Housing

HUD's Office of Fair Housing and Equal Opportunity (FHEO) draws a distinction between housing affordability and fair housing. Economic factors that affect a household's housing choices are not fair housing issues per se. Only when the relationship between household income, household type, race/ethnicity, and other factors create misconceptions, biases, and differential treatments would fair housing concerns arise.

Tenant/landlord disputes are also typically not related to fair housing. Most disputes between tenants and landlords result from a lack of understanding by either or both parties on their rights and responsibilities. Tenant/landlord disputes and housing discrimination cross paths when the disputes are based on factors protected by fair housing laws and result in differential treatment.

[1] http://www.nolo.com/legal-update/california-landlords-ask-immigration-citizenship-29214.html

2. Fair Housing Impediments

Within the legal framework of Federal and State laws, and based on the guidance provided by HUD's *Fair Housing Planning Guide*, impediments to fair housing choice can be defined as:

- Any actions, omissions, or decisions taken because of the characteristics protected under State and Federal laws, which restrict housing choices or the availability of housing choices; or
- Any actions, omissions or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of characteristics protected under State and Federal laws.

To affirmatively promote equal housing opportunity, a community must work to remove impediments to fair housing choice.

E. Organization of Report

This report is divided into seven chapters:

Chapter 1: Introduction defines "fair housing" and explains the purpose of this report.

Chapter 2: Community Participation describes the community outreach program and summarizes comments from residents and various agencies on fair housing issues such as discrimination, housing impediments, and housing trends.

Chapter 3: Community Profile presents the demographic, housing, and income characteristics in San Diego County. Major employers and transportation access to job centers are identified. The relationships among these variables are discussed. In addition, this section evaluates whether community care facilities, public and assisted housing projects, as well as Section 8 recipients in the County are unduly concentrated in Low and Moderate Income areas. Also, the degree of housing segregation based on race is discussed.

Chapter 4: Lending Practices assesses the access to financing for different groups. Predatory and subprime lending issues are discussed.

Chapter 5: Public Policies analyzes various public policies and actions that may impede fair housing within the County and the participating cities.

Chapter 6: Fair Housing Profile evaluates existing public and private programs, services, practices, and activities that assist in providing fair housing in the County. This chapter also assesses the nature and extent of fair housing complaints and violations in different areas of the County. Trends and patterns of impediments to fair housing, as identified by public and private agencies, are included.

Chapter 7: Impediments and Recommendations summarizes the findings regarding fair housing issues in San Diego County and provides recommendations for furthering fair housing practices.

At the beginning of this report are Signature Pages that include the signatures of the Chief Elected Officials (or his/her designee) along with a statement certifying that the Analysis of Impediments

represents the jurisdictions' official conclusions regarding impediments to fair housing choice and the actions necessary to address identified impediments.

F. Data Sources

According to the *Fair Housing Planning Guide*, HUD does not require the jurisdictions to commence a data collection effort to complete the AI. Existing data can be used to review the nature and extent of potential issues. Various data and existing documents were reviewed to complete this AI, including:

- 2000 and 2010 U.S. Census
- American Community Surveys[2]
- State Department of Finance Population and Housing Estimates
- Zoning ordinances, various plans, and resolutions of participating jurisdictions
- California Department of Social Services Community Care Licensing Division
- 2018 Employment Development Department employment and wage data
- 2012 and 2017 Home Mortgage Disclosure Act (HMDA) data on lending activities from LendingPatterns™
- Current market data for rental rates, home prices, and foreclosure activities
- Fair housing records from the Legal Aid Society of San Diego and CSA San Diego County
- Housing Choice Voucher (Section 8) data from local Housing Authorities
- California Department of Education

Sources of specific information are identified in the text, tables, and figures.

[2] The 2010 Census no longer provides detailed demographic or housing data through the "long form". Instead, the Census Bureau conducts a series of American Community Surveys (ACS) to collect detailed data. The ACS surveys different variables at different schedules (e.g. every year, every three years, or every five years) depending on the size of the community. Multiple sets of ACS data are required to compile the data for San Diego County in this report.

CHAPTER 2 COMMUNITY OUTREACH

AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

This ***Analysis of Impediments (AI)*** report has been developed to provide an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual's or a household's access to housing. As part of this effort, the report incorporates the issues and concerns of residents, housing professionals, and service providers. To assure the report responds to community needs, a community outreach program consisting of community workshops, targeted stakeholder interviews, and a fair housing survey was conducted in the development of this report. This chapter describes the community outreach program conducted to involve the community.

To reach the various segments of the community, several methods were used to obtain community input:

- Six community workshops
- Nine targeted stakeholder interviews to service providers and local organizations
- Fair housing survey

Appendix A contains further background on the outreach strategy, public outreach tools, surveys, and summary of meeting notes.

A. Community Workshops

Six community workshops were held in communities throughout the County in October and November 2019 to gather input regarding fair housing issues in the region. The locations and dates of the workshops were as follows:

Table 1: Community Workshop Locations

Area of County	Location	Date
Central Region	LISC San Diego, San Diego, CA	October 30, 2019
Eastern Region	El Cajon Police Department, El Cajon, CA	November 6, 2019
Northern Region	Escondido City Hall, Escondido, CA	November 7, 2019
Central Region	Valencia Park/Malcolm X Library	November 13, 2019
Southern Region	Chula Vista City Hall, Chula Vista, CA	November 20, 2019
Southern Region	MLK Jr. Community Center, National City, CA	November 21, 2019

To encourage attendance and participation, the workshops were publicized through the following methods:

- Multilingual flyers (print and digital) publicizing the six community workshops were mailed to 621 agencies, organizations, and interested individuals throughout the County, including a wide range of housing service providers and community organizations such as community planning groups, housing development corporations, service providers, housing industry professionals, civic organizations, housing authorities, housing groups, business organizations, religious organizations, schools, and local elected officials' offices.
- Multilingual flyers were posted on the websites of the participating cities and the County.
- Multilingual flyers were placed at public counters such as city halls, libraries, and community centers.
- Multilingual email-based ("e-blast") notifications through the participating agencies' email networks.
- Content for participating agencies' and stakeholders' communication channels such as newsletters, public service announcements, websites, and cable television channels.
- Social media posts to Facebook, Twitter, and Next Door.

1. Workshop Participants

A total of 63 individuals attended the community workshops. Aside from interested individuals and staff from the various cities and the County, several service providers and housing professionals participated in the fair housing workshops. These included:

- CSA San Diego County - Fair Housing
- Housing Navigators Homeless
- Housing Opportunities Collaborative
- Legal Aid Society San Diego
- MAAC Project, Kimball
- San Diego Housing Commission
- Solutions for Change
- Tirey & St. John LLP
- San Dieguito Alliance
- Community Resource Center – North Coast Community

2. Key Issues Identified

In reviewing the comments received at these workshops, several key issues are noted:

1. **Experiences with Housing Discrimination**
    - Individuals and families in the following protected classes shared experiences of housing discrimination:
        - Homeless

- Sexual orientation
- Individual with an emotional support animal
- Family with deported father
- Women with adopted children
- Families with children with autism
- Source of income or type of work

2. **Reporting of Housing Discrimination Incidents**
    - Burden of proof is on individual who has been discriminated against
    - Costs and length of time for litigation are a deterrent for reporting incidents
    - Fear of retaliation, harassment, or deportation from reporting incidents

3. **Barriers to Housing in Community**
    - 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.
    - The information on what subsidies or options are available are confusing and the application process is confusing.
    - Many different languages and dialects.
    - The shortage of affordable units and long Section 8 waiting list.
    - Barriers are often layered

4. **Protected Classes that Need Improved Services**
    - Seniors
    - Individuals with mental and physical disabilities
    - Victims of domestic violence
    - Arbitrary factors
    - Country of origin

5. **Misconceptions or Misunderstandings about Fair Housing**
    - If prospective tenants have to pay for a background report for every application
    - What qualified as a reasonable accommodation request

6. **Ways to Build Community Awareness about Fair Housing**
    - Need to improve how information is provided to community members by relating messaging to people's lives, letting people know they will learn something, simplifying language and documents.
    - Need to make sure that there are representatives at different agencies and providers that can communicate in different languages of local community.
    - Go directly to communities to provide information at community gathering places, community centers, churches, schools, colleges, community and cultural events, senior housing complexes, and community meetings.
    - Partner with organizations, cultural and faith-based groups, and organizations holding events to share information.
    - Provide incentives and expand how information can be seen and heard.

7. **Other Comments**
    - There should be a universal rental application.
    - Should tap into 211 Community Information Exchange to help share information.

The comments received during these community workshops have been incorporated into this AI as appropriate and documented in Appendix A.

B. Targeted Stakeholder Interviews

In addition to the input given by representatives from local organizations in attendance at the community workshops, key stakeholders were contacted for one-on-one interviews about the AI. Participants represented organizations that provide fair housing services and/or complementary and related support services. A representative from each of the following organizations participated in a telephone interview:

Table 2: Stakeholder Interviews

Stakeholder	Contact
Alliance for Regional Solutions	Mary Lynn McCorkle, Collaborations Manager October 30, 2019
CSA San Diego	Estela De Los Rios, Executive Director November 6, 2019
Elder Help San Diego	Robin Strickland, Housing Services Coordinator November 7, 2019
La Maestra Community Health Centers	John Kuek, Director of Integrated Community Services November 13, 2019
Legal Aid Society of San Diego County	Rosalina Spencer, Lead Lawyer November 20, 2019
National Alliance on Mental Illness	Aaron Basila, Community Outreach Worker November 21, 2019
Regional Task Force on the Homeless	Jennifer Yost, Director of Grants Management
San Diego Housing Federation	Laura Nunn, Director of Policy and Programs
Southern California Rental Housing Association	Molly Kirkland, Director of Public Affairs

1. Key Issues Identified

In reviewing the comments received at these interviews, several key issues are noted:

1. **Greatest Challenges to Building Community Awareness**
    - Keeping up with updates to laws and regulations
    - Identifying community partners to share information with and provide training
    - Resistance to change by homeowners
    - Language barriers

2. **Barriers to Housing in Community**
    - Large and diverse geographic area

- Language barriers and different dialects
- Housing affordability impacts and low vacancy rate
- Difficulty finding a place to live with Section 8 voucher
- Access to technology
- Limited hours and transportation route options
- Lack of awareness about services and resources
- Miscommunications between landlords and tenants, and tenants and service providers
- Individuals with mental and physical disabilities have difficulty finding housing
- Large families have difficulty finding housing
- Poor quality of housing and landlords that won't improve units

3. Misconceptions or Misunderstandings about Fair Housing

- Difficult or complex laws and requirements, different requirements for different programs, and difficulty navigating process
- Not understanding role of different agencies or service providers
- Terminology and different definitions or understanding of terms like discrimination, affordable housing, intent, or eviction
- Lack of understanding about different individuals or people who are homeless, suffering from mental illness, live in permanent supportive housing

4. Greatest Challenges in Meeting Fair Housing Needs

- Under reporting of discrimination until after the fact, or due to fear of retaliation, or the length of time to pursue legal action
- It is difficult to find the right information and staff at public agencies are overloaded with requests
- Many homeless individuals don't have the right documentation to apply to programs
- Section 8 waitlist is over 10 years long
- Lack of housing affordability is causing people to leave California
- NIMBYs and opposition to growth and siting of new housing

5. Protected Classes that Need Improved Services

- Disabled individuals
- Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ)
- Large families
- Tenants utilizing Section 8 vouchers
- Seniors and aging population
- Religious discrimination
- Homeless individuals and families

6. Community Assets That Can be Leveraged to Further Fair Housing

- Banks can promote first time home buying program
- Community forums in North County
- Community groups and centers
- Pop-up events at transit stations, or libraries where there is high foot traffic

- Postings on Next Door
- Utilizing 211 to help direct people to resources
- Providing additional education and resources including a resource binder at housing service providers and trainings targeted to landlords or property managers.

7. Possible Improvements to Inter-Agency Coordination

- Ensuing that landlords are involved in the discussion
- Reducing bureaucratic layers
- SDRAFFH Fair Housing Conference can provide a venue to develop a shared understanding of challenges and implementation
- Shift focus to thinking about why rules and regulations exist rather than checking boxes
- Create a shared database of agencies and programs
- Provide additional training opportunities and avenues for sharing information such as email blasts
- Collaborate with non-profits to provide wrap around services and trainings
- Have City Council and Board of Supervisors on boards of different organizations

8. Ways to Promote Outreach for AI Workshops and Surveys

- Provide notices and survey links to landlords and property owners
- Place advertisements on billboards, at transit stops, or at churches, stores, swap meets
- Share information at community centers, religious facilities, and with community leaders
- Partner with elected officials or city staff to disseminate information
- Link promotion of AI to other related topics such as homelessness
- Send notification of workshops to individuals on Section 8 waitlist

9. Additional Comments

- Recommend that landlords post evaluation criteria in advertisements
- Need more housing and Fair Housing should be at the center of the discussion about the housing crisis.
- Getting information out to tenants about Fair Housing rights and regulations is important
- Supportive housing with other support services is important
- Siting of permanent supportive housing should occur throughout the County within proximity to other services and amenities.

The comments received during these interviews have been incorporated into this AI, as appropriate, and documented in Appendix A.

C. Fair Housing Survey

The Fair Housing Survey sought to gain knowledge about the nature and extent of fair housing issues experienced and to gauge the perception of fair housing needs and concerns of County residents. The survey was available in multiple languages, including English, Spanish, Tagalog, Chinese, Arabic, and Vietnamese on the websites of the County and all participating jurisdictions. Hard copies of the survey were provided to a number of local agencies for distribution to their clients. The community workshop flyer, including links to the online survey, was mailed to over 1,000 housing and service providers, encouraging them to provide their unique perspective by participating in the Community Needs Survey.

Because responses to the survey were not controlled[3], results of the survey are used only to provide some insight regarding fair housing issues, but cannot be treated as a statistically valid survey. Furthermore, the survey asked for respondents' perception in housing discrimination. A person responding having been discriminated does not necessarily mean discrimination has actually taken place.

1. Summary of Survey Results

Who Responded to the Survey?

A total of 1,132 persons responded to the Housing Discrimination Survey. The majority of survey respondents felt that housing discrimination was not an issue in their neighborhoods. There were 305 persons who answered "YES" to whether they have personally experienced discrimination in housing.

Who Do You Believe Discriminated Against You? [4]

Among the persons indicating that they had experienced housing discrimination, 59 percent (248 persons) indicated that a landlord or property manager had discriminated against them, while eight percent (35 persons) of respondents identified a Government staff person as the source of discrimination. Responses for the fair housing survey are not mutually exclusive; respondents had the option of listing multiple perpetrators of discrimination.

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[3] A survey with a "controlled" sample would, through various techniques, "control" the socioeconomic characteristics of the respondents to ensure that the respondents are representative of the general population. This type of survey would provide results that are statistically valid but is much more costly to administer.

[4] Because respondents could indicate multiple answers on a single questions, the percentages on these multiple choice questions do not add up to 100 percent nor do the total number answers add up to the total number of respondents.

Table 3: Perpetrators of Alleged Discrimination

	Number	Percent
Landlord/Property Manager	248	59%
Other	55	13%
Real Estate Agent	36	9%
Government Staff Person	35	8%
Mortgage Lender	35	8%
Insurance Broker/Company	10	2%
Total Responses	**419**	**--**

Notes:
1. Categories are not mutually exclusive.
2. Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

Where Did the Act of Discrimination Occur?

Among the persons indicating that they had experienced housing discrimination, 38 percent (174 persons) indicated that the discrimination occurred in an apartment complex. About 21 percent (96 persons) indicated that the discrimination occurred in a single-family neighborhood, 10 percent (45 persons) indicated that it took place in a public/subsidized housing project, 11 percent (53 persons) indicated that it took place at a condo/townhome development, and another 10 percent (46 persons) indicated that it took place when applying for City/County programs. Also, three percent (15 persons) indicated that the act of discrimination occurred in a mobilehome park.

Table 4: Location of Alleged Discrimination

Location	Number	Percent
Apartment Complex	174	38%
Single-Family Neighborhood	96	21%
Condo/Townhome Development	53	11%
Applying for City/County Programs	46	10%
Public or Subsidized Housing Project	45	10%
Other	33	7%
Mobilehome Park	15	3%
Total Responses	**462**	**--**

Notes:
1. Categories are not mutually exclusive.
2. Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

On What Basis Do You Believe You Were Discriminated Against?

Of the 305 people who felt they were discriminated against, the most common causes for alleged discrimination were race, other, source of income, and family status.

Table 5: Basis of Alleged Discrimination

Basis	Number	Percent
Race	105	16%
Source of Income	93	15%
Family Status	82	13%
Other	78	12%
Age	60	9%
Disability/Medical Conditions	54	8%
Color	45	7%
Marital Status	40	6%
Gender	40	6%
National Origin	13	2%
Religion	12	2%
Ancestry	10	2%
Sexual Orientation	9	1%
Total Response	**641**	**--**

Notes:
1. Categories are not mutually exclusive.
2. Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

Requests for Reasonable Accommodation or Modification

Among those who responded to the fair housing questions, 25 percent (77 persons) indicated that they had been denied "reasonable accommodation" in rules, policies or practices for their disability or a "reasonable modification" in the access to their homes.

Why Did You Not Report the Incident?

Of the survey respondents who felt they were discriminated against, 18 percent (54 persons) reported the discrimination incident. Many of the respondents (27 percent) who did not report the incident indicated that they don't believe it makes a difference. In addition, 25 percent did not know where to report the incident, 14 percent were afraid of retaliation, and 12 percent felt it was too much trouble.

Table 6: Reason for Not Reporting Alleged Discrimination

Reason	Number	Percent
Other	150	27%
Don't believe it makes a difference	138	25%
Don't know where to report	120	22%
Afraid of Retaliation	77	14%
Too much trouble	66	12%
Total Responses	**551**	**--**

Notes:
1. Categories are not mutually exclusive.
2. Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

Has Any Hate Crime Been Committed in Your Neighborhood?

Of those who responded to the survey, seven percent (158 persons) indicated that a hate crime had been committed in their neighborhood. Most of these respondents (24 percent) indicated that the hate crime committed was based on race. Other notable causes of the alleged hate crimes include religion, national origin, and color.

Table 7: Basis of Alleged Hate Crime

Basis	Number	Percent
Race	86	24%
National Origin	37	10%
Religion	37	10%
Color	36	10%
Sexual Orientation	31	9%
Source of Income	21	6%
Disability/Medical Conditions	21	6%
Age	13	4%
Ancestry	12	3%
Gender	11	3%
Family Status	9	3%
Marital Status	8	2%
Total Responses	**353**	**--**

Notes:
1. Categories are not mutually exclusive.
2. Survey respondents were not required to provide answers for every question; therefore, total responses will vary by question.

D. Public Review of Draft AI

The draft AI was made available for public review beginning in May 2020. During the 30-day public review period, the document was made available at City Halls, County Administration Office, and other public locations. The Draft AI was considered at the following public meetings:

- City of Carlsbad – City Council Meeting, ____, 2020
- City of Chula Vista – City Council Meeting, _____, 2020
- City of El Cajon – City Council Meeting, June 9, 2020
- City of Encinitas – City Council Meeting, June 24, 2020
- City of Escondido – City Council Meeting, June 3, 2020
- City of La Mesa – City Council Meeting, _____, 2020
- City of National City – City Council Meeting, _____, 2020
- City of Oceanside – City Council Meeting, _____, 2020
- City of San Diego – City Council Meeting, _____, 2020
- City of San Marcos – City Council Meeting, _____, 2020
- City of Santee – City Council Meeting, June 10, 2020
- City of Vista – City Council Meeting, _____, 2020

CHAPTER 3

COMMUNITY PROFILE

AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

San Diego County, boasts an estimated population of over three million residents, making it the second most populous county in California and fifth in the nation (In California, only Los Angeles County has a larger population). Encompassing 4,261 square miles, San Diego County's borders include 18 incorporated cities and numerous unincorporated neighborhoods and communities. The county stretches south from Orange County to the U.S.-Mexico border. The Pacific Ocean forms the western boundary, and the county's eastern edge reaches to the Laguna Mountains and the Anza-Borrego Desert.

Like many major metropolitan areas in the United States, the minority population in San Diego County has increased significantly in recent years, especially among Asian and Hispanic groups. As this Chapter and subsequent chapters will discuss, fair housing issues tend to affect racial and ethnic minority groups, as well as persons with disabilities. The cost of living in San Diego County is high and getting higher than many other regions in the nation. Median household incomes have not kept pace with the rising cost of housing and living in the San Diego region, a trend seen nationwide. While housing affordability is not a fair housing issue *per se*, the increased demand for housing and the dwindling supply may create conditions where fair housing violations become a common part of the competition in the housing market.

In an economic market where the need for affordable housing for the county's poorest residents remains overwhelming, various factors may affect the ability of individuals with similar incomes and needs in the same housing market to obtain a like range of housing choices. This section provides an overview of San Diego County's residents and housing stock, including population, economic, and housing trends that help identify housing needs specific to the region. This overview will provide the context for discussing and evaluating fair housing in the following chapters.

A. Demographic Profile

Examination of demographic characteristics provides some insight regarding the need and extent of equal access to housing in a community. Supply and demand factors can create market conditions that are conducive to housing discrimination. Factors such as population growth, age characteristics, and race/ethnicity all help determine a community's housing need and play a role in exploring potential impediments to fair housing choice.

1. Population Growth

Population growth in San Diego County from 2010 to 2019 was slightly lower than the previous decade. Overall, San Diego County experienced a 10 percent increase in population from 2000 to 2010 and a 8.3 percent increase in population from 2010 to 2019 (Table 8). From both 2000 to 2010 and 2010 to 2019, the cities of San Marcos, Chula Vista, and Carlsbad had the largest growth. All cities experienced a population growth in the last decade except for the city of Coronado, whose population dropped by two percent. The San Diego Association of Governments (SANDAG) population projections indicate that by 2035 the county's population could reach 3,853,698, an approximately 15 percent increase from the 2019 population estimates. Several cities are projected to have larger increases between 2019 and 2035 than the

San Diego region as a whole, including Chula Vista, La Mesa, National City, San Diego, and the unincorporated areas of the county.

Table 8: Population Growth (2000-2035)

Jurisdiction	Total Population				Percent Change		
	2000	2010	2019	2035 (Projected)	2000-2010	2010-2019	2019-2035
Urban County							
Coronado	24,100	24,697	24,199	24,165	2.5%	-2.0%	-0.1%
Del Mar	4,389	4,161	4,451	4,672	-5.2%	7.0%	5.0%
Imperial Beach	26,980	26,324	27,448	30,369	-2.4%	4.3%	10.6%
Lemon Grove	24,954	25,320	27,208	28,673	1.5%	7.5%	5.4%
Poway	48,295	47,811	50,320	53,062	-1.0%	5.2%	5.4%
Solana Beach	12,887	12,867	13,933	14,207	-0.2%	8.3%	2.0%
Unincorporated	441,919	486,604	515,403	617,570	10.1%	5.9%	19.8%
Total Urban County	583,524	627,784	662,962	772,718	7.6%	5.6%	16.6%
Entitlement Jurisdictions							
Carlsbad	77,998	105,328	115,241	124,351	35.0%	9.4%	7.9%
Chula Vista	173,860	243,916	271,411	326,625	40.3%	11.3%	20.3%
El Cajon	94,819	99,478	105,559	109,383	4.9%	6.1%	3.6%
Encinitas	58,195	59,518	63,390	65,264	2.3%	6.5%	3.0%
Escondido	133,528	143,911	152,739	172,892	7.8%	6.1%	13.2%
La Mesa	54,751	57,065	60,820	70,252	4.2%	6.6%	15.5%
National City	54,405	58,582	62,307	73,329	7.7%	6.4%	17.7%
Oceanside	160,905	167,086	178,021	188,597	3.8%	6.5%	5.9%
San Diego	1,223,341	1,301,617	1,420,572	1,665,609	6.4%	9.1%	17.2%
San Marcos	55,160	83,781	98,369	109,095	51.9%	17.4%	10.9%
Santee	53,090	53,413	58,408	63,812	0.6%	9.4%	9.3%
Vista	90,131	93,834	101,987	111,771	4.1%	8.7%	9.6%
Total County	**2,813,707**	**3,095,313**	**3,351,786**	**3,853,698**	**10.0%**	**8.3%**	**15.0%**

Sources: U.S. Census Bureau, 2000, 2010 Census; California Department of Finance 2019 Population Estimates (E-5); SANDAG Regional Growth Forecast Series 13 (2012).

2. Age

Housing demand is affected by the age characteristics of residents in a community. Different age groups are often distinguished by important differences in lifestyle, family type, housing preferences and income levels. Typically, young adult households may occupy apartments, condominiums, and smaller single-family homes because of size and/or affordability. Middle-age adults may prefer larger homes as they begin to raise their families, while seniors may prefer apartments, condominiums, mobile homes, or smaller single-family homes that have lower costs and less extensive maintenance needs. Because a community's housing needs change over time, this section analyzes changes in the age distribution of San Diego County residents and how these changes affect housing need.

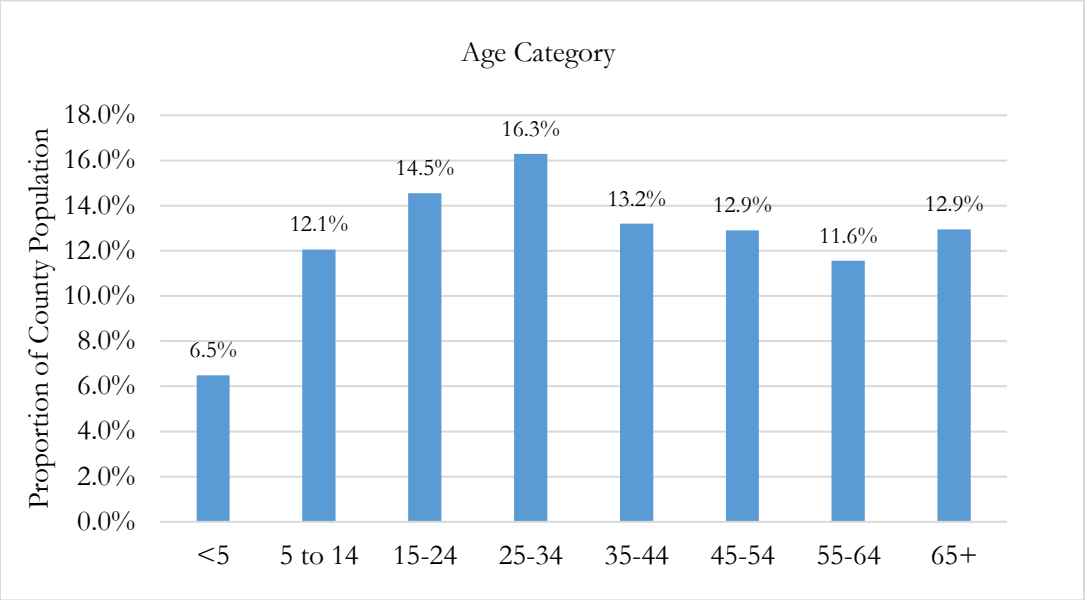
As Table 9 shows, the median age has risen in all but three jurisdictions in San Diego County from 2010 to 2017. Median age decreased in Coronado, Solana Beach, and La Mesa. The county median age was 34.6 years in 2010 and rose to 35.4 by 2017. In 2017, the median age in the various cities ranged from a low of 31.9 years in Imperial Beach to a high of 50.7 years in Del Mar. Based on the 2017 American Community Survey, 12.9 percent of the population in San Diego County was age 65 or over (seniors), with another 11.6 percent in the 55 to 64 age group (future seniors). Close to 12.1 percent of San Diego County residents were school-age children between the ages of five and 14, and over 30 percent of residents were between the age of 15 and 34 (Figure 1). This age structure suggests the county has a high proportion of families with children and has a rapidly increasing older population.

Table 9: Age Characteristics

Jurisdiction	Age Category								Median Age	
	<5	5-14	15-24	25-34	35-44	45-54	55-64	65+	2010	2017
Urban County										
Coronado	4.9%	9.5%	19.3%	13.5%	9.1%	11.1%	13.8%	18.7%	40.7	38.1
Del Mar	1.7%	7.9%	3.7%	15.8%	9.2%	19.7%	16.5%	25.6%	48.6	50.7
Imperial Beach	6.5%	15.1%	16.1%	17.3%	12.6%	11.7%	10.4%	10.3%	31	31.9
Lemon Grove	6.3%	15.4%	11.5%	15.8%	14.7%	11.6%	12.3%	12.4%	35	35.6
Poway	6.3%	13.7%	13.0%	11.1%	12.1%	15.2%	13.8%	14.8%	41.3	40
Solana Beach	3.9%	9.6%	9.1%	13.7%	12.5%	14.8%	13.7%	22.8%	43.7	46.1
Unincorporated	6.7%	11.8%	15.7%	12.9%	11.6%	13.2%	13.1%	15.0%	N/A	N/A
Total Urban County	6.5%	12.1%	15.3%	13.1%	11.7%	13.2%	13.1%	15.1%	N/A	N/A
Entitlement Jurisdictions										
Carlsbad	6.0%	13.9%	10.5%	11.6%	15.0%	16.3%	12.5%	14.0%	38.9	40.4
Chula Vista	7.2%	15.6%	15.3%	13.7%	15.2%	13.8%	9.2%	10.0%	33.0	33.7
El Cajon	7.6%	13.5%	15.8%	14.7%	12.9%	14.3%	10.1%	11.0%	31.9	33.7
Encinitas	5.4%	11.6%	10.0%	13.4%	14.5%	16.9%	15.4%	12.8%	37.9	41.5
Escondido	8.1%	14.9%	15.4%	15.0%	13.5%	13.1%	9.6%	10.5%	31.2	32.5
La Mesa	6.3%	10.0%	14.4%	16.3%	13.1%	14.5%	11.2%	14.2%	37.3	37.1
National City	6.9%	13.8%	20.9%	14.7%	12.4%	12.0%	8.6%	10.6%	28.7	30.2
Oceanside	7.0%	12.7%	15.5%	14.5%	12.9%	14.0%	10.5%	12.9%	33.3	35.2
San Diego	6.2%	11.5%	16.7%	17.6%	14.1%	13.2%	10.1%	10.7%	32.5	33.6
San Marcos	8.4%	15.2%	15.3%	14.4%	15.8%	12.2%	8.7%	10.2%	32.1	32.9
Santee	6.6%	12.8%	13.9%	13.7%	14.0%	16.3%	12.0%	10.7%	34.8	37.2
Vista	8.0%	14.2%	17.1%	16.2%	13.2%	13.3%	8.7%	9.2%	30.3	31.1
Total County	**6.6%**	**12.7%**	**16.0%**	**15.2%**	**13.6%**	**13.9%**	**10.6%**	**11.4%**	**33.2**	**34.6**

Sources: U.S. Census Bureau, 2010 Census; American Community Survey, 2013-2017.

Figure 1: San Diego County Age Structure (2017)



Source: American Community Survey, 2013-2017.

3. Racial and Ethnicity

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. According to 2018 American Community Survey estimates, 40 percent of U.S. residents were non-White. Growing Hispanic and Asian populations have contributed to a major transformation, reducing the number of White majority places and increasing the number of minority-majority and no-majority places. 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.[5]

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.

The State of California's and San Diego County's demographic profiles have become increasingly diverse in their race and ethnic compositions since 1970, a period that coincides with the sharp increase in immigration. 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

[5] Lee, Barrett and Iceland, A. John and Sharp, Gregory. "Racial and Ethnic Diversity Goes Local: Charting Change in American Communities Over Three Decades". Project US2010, (2012).

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 10: Racial and Ethnic Composition

Jurisdiction	White	Black	Hispanic	Asian/ P. Isl.	Other	Percent Minority* 2010	Percent Minority* 2017
Urban County							
Coronado	75.1%	3.5%	14.5%	3.5%	3.4%	20.6%	24.9%
Del Mar	91.3%	0.5%	4.7%	2.6%	1.0%	9.3%	8.7%
Imperial Beach	31.4%	4.0%	51.3%	8.6%	4.8%	64.0%	68.6%
Lemon Grove	31.9%	12.7%	44.4%	6.1%	4.8%	65.3%	68.1%
Poway	63.7%	0.9%	18.5%	12.9%	4.0%	30.9%	36.3%
Solana Beach	78.4%	0.4%	11.5%	5.1%	4.6%	22.7%	21.6%
Unincorporated	58.6%	4.2%	26.9%	5.9%	4.3%	38.6%	41.4%
Total Urban County	58.0%	4.2%	27.1%	6.4%	4.3%	39.1%	42.0%
Entitlement Jurisdictions							
Carlsbad	74%	0.9%	14%	7.8%	3.4%	25%	26%
Chula Vista	18%	4.2%	60%	15%	1.0%	80%	82%
El Cajon	56%	5.4%	29%	4.1%	4.8%	43%	44%
Encinitas	79%	0.6%	13%	4.2%	4.8%	21%	21%
Escondido	37%	2.1%	51%	7.0%	4.0%	60%	63%
La Mesa	56%	6.6%	26%	6.2%	4.6%	38%	44%
National City	10%	4.5%	64%	20%	4.3%	88%	90%
Oceanside	48%	4.9%	35%	7.9%	4.3%	52%	52%
San Diego	43%	6.1%	30%	17%	3.4%	55%	57%
San Marcos	45%	2.5%	39%	10%	1.0%	51%	55%
Santee	70%	1.9%	18%	4.8%	4.8%	26%	30%
Vista	40%	2.8%	50%	4.8%	4.8%	59%	60%
Total County	**46%**	**4.7%**	**33%**	**12%**	**4.0%**	**52%**	**54%**
Total State	38%	5.5%	39%	14%	4.6%	60%	62%

Sources U.S. Census Bureau, 2010. American Community Survey. 2013-2017.
* 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.

Race and Ethnic Concentration

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[6]. Figure 2 illustrates concentrations of minority households by Census block group in San Diego County. A concentration is defined as a block group with a proportion of minority households that is greater than the overall San Diego County minority average of 50.8 percent[7] . An important note on the mapping of racial/ethnic concentrations is that concentration is defined by the proportion of a racial/ethnic group in the total population of a census block group. If a census block group has low population, such as in and near the State and National Parks (eastern portions of the map), the proportion of a racial/ethnic group may appear high even though the number of residents in that group may be limited. Furthermore, block group boundaries may cross jurisdictional boundaries

The minority population in the county is described by sub-region in Table 11. In San Diego County, the minority population is concentrated in the southern areas of the City of San Diego and continuing south (Figure 2). 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.

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6 U.S. Department of Housing and Urban Development. "Annual Report on Fair Housing FY 2017", (2017).

7 This minority percentage differs from the 54 percent in Table 3 due to calculation differences in the unit of measurement. This value was calculated using the census block groups and block group boundaries may cross jurisdictional boundaries.

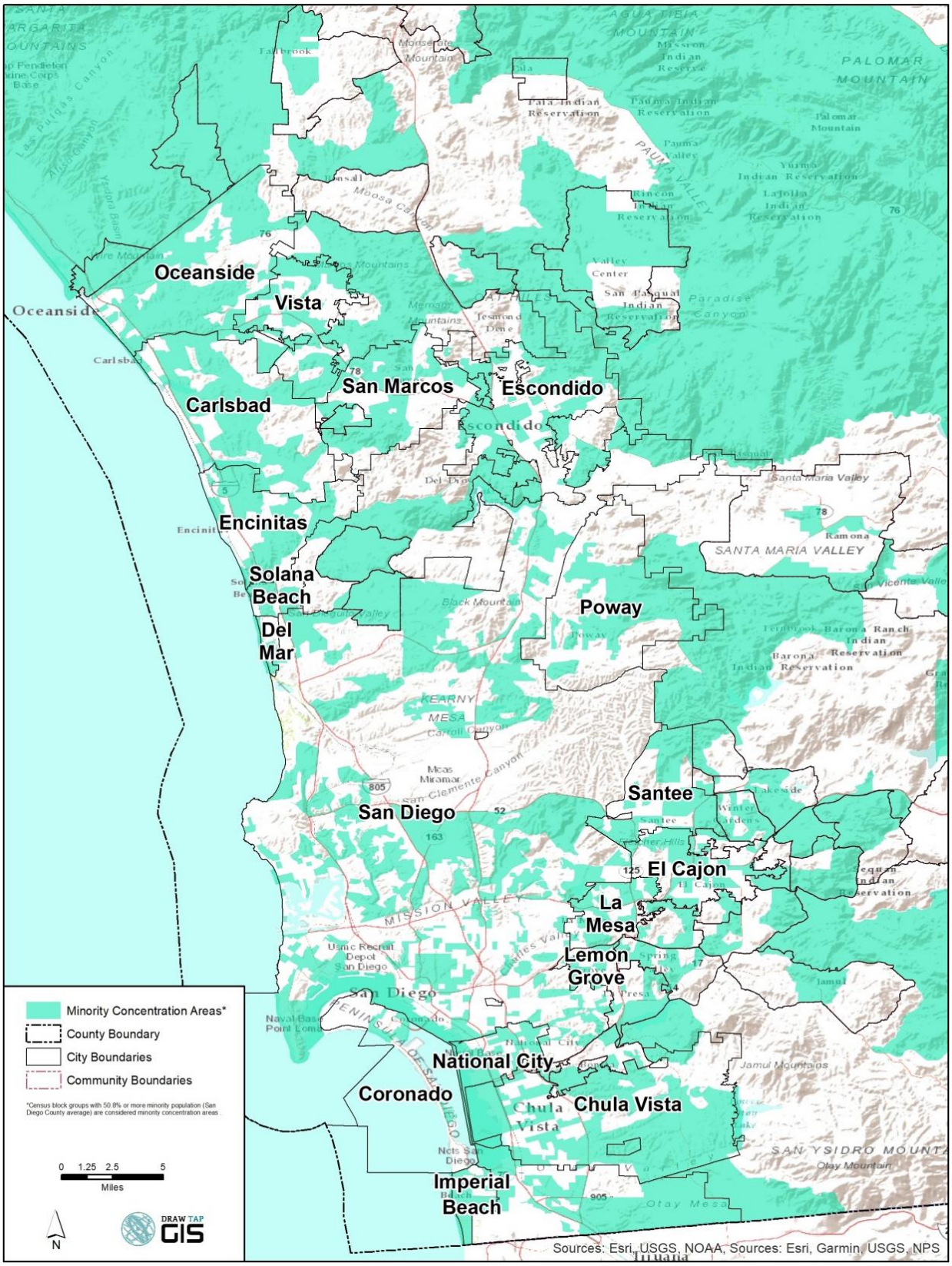
Table 11: Minority Population by Sub-region

MSA	Region	Minority Population		Total Population		% Minority in Region	
		2010	2018	2010	2018	2010	2018
0	Central	414,065	437,635	630,376	679,213	65.7%	64.4%
1	North City	296,118	371,440	733,866	812,706	40.4%	45.7%
2	South Suburban	312,045	335,810	385,468	407,514	81.0%	82.4%
3	East Suburban	187,436	229,518	481,993	509,452	38.9%	45.1%
4	North County West	149,733	174,472	405,715	440,048	36.9%	39.6%
5	North County East	226,139	250,322	431,208	458,801	52.4%	54.6%
6	East County	9,730	9,858	26,687	26,722	36.5%	36.9%
	Total	**1,595,266**	**1,809,055**	**3,095,313**	**3,334,456**	**51.5%**	**54.3%**

Sources: U.S. Census Bureau, 2010 Census; SANDAG, Series 14 (2018).

A significant portion of San Diego County's population is also foreign born. According to the 2013-2017 ACS, one-fourth of the county's population is foreign born and almost 90 percent of them are from non-European countries. About half of foreign-born residents in the county are from Latin America and a large portion of immigrants are from Asian countries (38 percent). More than a third of the foreign-born Asian population came from the Philippines, a Southeast Asian country.

Figure 2: Minority Concentration Areas



Linguistic Isolation

A language barrier can be an impediment to accessing housing of choice. A population that is both minority and does not speak English well may face discrimination based on national origin as well as challenges related to obtaining housing, such as communicating effectively with a property owner, landlord, rental agent, real estate agent, mortgage lender or insurance agent.

According to the 2013-2017 ACS, approximately 37.7 percent of county residents over the age of five spoke a language other than "English only" at home. In some cities with a large minority population, such as the cities of Imperial Beach, Lemon Grove, Chula Vista, El Cajon, Escondido, National City, San Diego, San Marcos, and Vista this figure was higher. In National City, 70.3 percent of the population over the age of five years spoke a language other than English at home.

Table 12: Language and Linguistic Isolation

Jurisdiction	Total Population	Speak Language Other Than English at Home		Speak English Less than "Very Well"		
		Total	% Total Population	Total	% of Speaking Non-English Language	% Total Population
Urban County						
Coronado	22,878	3,311	14.5%	848	25.6%	3.7%
Del Mar	4,264	333	7.8%	60	18.0%	1.4%
Imperial Beach	25,500	12,550	49.2%	4,187	33.4%	16.4%
Lemon Grove	24,968	10,194	40.8%	3,357	32.9%	13.4%
Poway	46,715	12,149	26.0%	5,180	42.6%	11.1%
Solana Beach	12,847	1,847	14.4%	707	38.3%	5.5%
Unincorporated	473,988	119,992	25.3%	43,890	36.6%	9.3%
Total Urban County	611,160	160,376	26.2%	58,229	36.3%	9.5%
Entitlement Jurisdictions						
Carlsbad	106,371	18,183	17.1%	7,025	38.6%	6.6%
Chula Vista	246,395	146,846	59.6%	55,768	38.0%	22.6%
El Cajon	95,405	41,750	43.8%	20,103	48.2%	21.1%
Encinitas	59,177	9,405	15.9%	3,678	39.1%	6.2%
Escondido	138,640	67,537	48.7%	31,749	47.0%	22.9%
La Mesa	55,440	13,332	24.0%	4,324	32.4%	7.8%
National City	56,914	40,019	70.3%	15,991	40.0%	28.1%
Oceanside	163,706	51,440	31.4%	23,118	44.9%	14.1%
San Diego	1,303,777	529,264	40.6%	214,379	40.5%	16.4%
San Marcos	87,085	32,716	37.6%	17,263	52.8%	19.8%
Santee	53,894	8,447	15.7%	2,661	31.5%	4.9%
Vista	92,799	37,659	40.6%	17,757	47.2%	19.1%
Total County	**3,070,763**	**1,156,974**	**37.7%**	**472,045**	**40.8%**	**15.4%**

Source: American Community Survey, 2013-2017.

Linguistically isolated household can be described as a household whose members have at least some difficulty speaking English. The ACS provides information on households with persons five years and over who speak English "less than very well." In San Diego County, 15.4 percent of residents indicated that they spoke English "less than very well" and can be considered linguistically isolated. Of those that speak a language other than English at home, 40.8 percent speak English less than very well. The cities of National City, Escondido, and Chula Vista have the highest percentage of total residents who spoke English less than "very well" (28.1, 22.9 and 22.6 percent of the total population, respectively).

Language barriers may prevent residents from accessing services, information, and housing, and may affect educational attainment and employment. Executive Order 13166 ("Improving Access to Services by Persons with Limited English Proficiency") was issued in August 2000, which requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to Limited English Proficiency (LEP), cannot fully and equally participate in or benefit from those programs and activities. This requirement passes down to grantees of federal funds as well.

B. Household Characteristics

Household type and size, income level, the presence of persons with special needs, and other household characteristics may affect access to housing. This section details the various household characteristics that may affect equal access to housing.

What is a Household?

A household is defined by the Census as all persons occupying a housing unit. Families are a subset of households and include all persons living together who are related by blood, marriage or adoption. Single households include persons living alone but do not include persons in group quarters such as convalescent homes or dormitories. "Other" households are unrelated people living together, such as roommates.

1. Household Composition and Size

According to the 2019 California Department of Finance Housing estimates, there are 1,219,460 households in San Diego County, a 12.2-percent increase since 2010. The cities of San Marcos, Carlsbad, and Chula Vista saw the largest increases in the number of households between 2000 and 2010. However, in the last decade, the cities of Coronado and Del Mar had the greatest increases in the number of households (31.5 percent and 27.2 percent) while San Marcos, Carlsbad, and Chula Vista had moderate household growth (18.1, 13.9, and 13.3 percent). None of the cities saw a decrease in household numbers.

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.

Table 13: Household Growth by Jurisdiction

Jurisdiction	Households		Household Growth
	2010	2019	2010-2019
Urban County			
Coronado	7,409	9,740	31.5%
Del Mar	2,064	2,625	27.2%
Imperial Beach	9,112	10,074	10.6%
Lemon Grove	8,434	9,114	8.1%
Poway	16,128	16,917	4.9%
Solana Beach	5,650	6,569	16.3%
Unincorporated	159,339	178,844	12.2%
Total Urban County	208,136	233,883	12.4%
Entitlement Cities			
Carlsbad	41,345	47,080	13.9%
Chula Vista	75,515	85,535	13.3%
El Cajon	34,134	36,148	5.9%
Encinitas	24,082	26,495	10.0%
Escondido	45,484	48,833	7.4%
La Mesa	24,512	26,869	9.6%
National City	15,502	17,264	11.4%
Oceanside	59,238	65,902	11.2%
San Diego	483,092	545,645	12.9%
San Marcos	27,202	32,126	18.1%
Santee	19,306	21,100	9.3%
Vista	29,317	32,580	11.1%
Total County	**1,086,865**	**1,219,460**	**12.2%**

Sources U.S. Census Bureau, 2010; California Department of Finance Population and Housing Estimates (E-5), 2019.

The majority of San Diego County households are family households, with a roughly even mix between married-couple households with and without children (Table 14). 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.

More than 67 percent of all households within the County of San Diego are family households. Nationally, HUD data show that familial status discrimination ranks third in discrimination of protected classes, behind discrimination due to disability and race.[8] 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

[8] U.S. Department of Housing and Urban Development. "Annual Report on Fair Housing FY 2017". (2017).

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.

Table 14: Household Type

Household Type	2010		2017	
	Number of Households	Percent of Households	Number of Households	Percent of Households
Family Households	720,480	66.3%	747,245	67.2%
Married with Children[1]	263,046	24.2%	259,963	23.4%
Married – no Children	268,879	24.7%	296,702.45	26.7%
Other Family with Children	113,072	10.4%	112,172	10.1%
Other Family – no Children	75,483	6.9%	78,408	7.1%
Non-Family Households	366,385	33.7%	364,494	32.8%
Single, non-senior	174,593	16.1%	169,854	15.3%
Single, senior	86,624	8.0%	96,591	8.7%
Total County	**1,086,865**	**100.0%**	**1,111,739**	**100.0%**

Source: U.S. Census Bureau, 2010 Census; American Community Survey, 2013-2017.
[1] With children categories calculated using the HH with one or more persons under 18

Certain jurisdictions in the county had a higher than average proportion of family households with children and, therefore, may be more vulnerable to this type of discrimination. The proportion of families with dependent children was highest in the City of Chula Vista (39.9 percent) and Poway (37.7 percent). The proportion of families with children in the unincorporated areas (31.5 percent) is similar to the countywide proportion (30.2 percent). Close to nine percent of households in the county included senior members and six percent of households were female-headed households with children. Single-parent households with children and households headed by seniors have unique fair housing issues as discussed later in this chapter.

Table 15: Household Characteristics

Jurisdiction	% Families	% Families with Children	% Elderly Households	% Female-Headed Households w/ Children
Urban County				
Coronado	66.1%	27.0%	12.8%	4.0%
Del Mar	58.2%	13.4%	8.6%	0.9%
Imperial Beach	68.7%	32.0%	6.6%	10.6%
Lemon Grove	70.4%	33.9%	9.9%	7.0%
Poway	80.5%	37.7%	7.5%	4.6%
Solana Beach	55.4%	20.3%	16.1%	2.1%
Unincorporated	76.2%	31.5%	9.1%	2.7%
Total Urban County	75.9%	31.9%	9.4%	3.4%
Entitlement Cities				
Carlsbad	70.8%	31.7%	9.6%	5.6%
Chula Vista	79.0%	39.9%	7.0%	8.6%
El Cajon	72.0%	35.8%	8.3%	20.7%
Encinitas	64.2%	27.7%	11.8%	3.6%
Escondido	72.7%	36.0%	8.9%	7.6%
La Mesa	58.4%	24.5%	13.0%	6.5%
National City	74.3%	34.9%	9.5%	11.8%
Oceanside	67.5%	26.6%	11.0%	5.2%
San Diego	60.4%	27.0%	8.0%	5.7%
San Marcos	73.9%	37.2%	9.4%	5.7%
Santee	73.4%	32.8%	9.7%	6.4%
Vista	70.9%	34.3%	7.3%	7.2%
Total County	**67.2%**	**30.2%**	**8.7%**	**6.0%**

Source: American Community Survey, 2013-2017.

Household Size

The average size and composition of households are highly sensitive to the age structure of the population but they also reflect social and economic changes. For example, economic downturns may prolong the time adult children live at home or result in multiple families and non-family members living together to lower housing costs. The average household size countywide in 2017 was 2.87 persons per household, a very slight increase from 2010 (2.75). Average household size ranged from a low of 2.01 persons in Del Mar to a high of 3.47 in National City. Geographically, average household size increased in the Southern and Eastern areas of the county. Nine cities had an average household size over three persons in 2017, compared to only five in 2019. Notably, no cities in the Urban County had with an average household size over three persons in the 2010 but by 2017, average household size was greater than 3.0 in Imperial Beach, Lemon Grove, and Poway.

Table 16: Average Household Size by Jurisdiction

Jurisdiction	Average Household Size	
	2010	2017
Urban County		
Coronado	2.31	2.40
Del Mar	2.02	2.01
Imperial Beach	2.82	3.02
Lemon Grove	2.96	3.12
Poway	2.93	3.12
Solana Beach	2.28	2.33
Unincorporated	--	--
Entitlement Cities		
Carlsbad	2.53	2.60
Chula Vista	3.21	3.34
El Cajon	2.84	3.09
Encinitas	2.45	2.56
Escondido	3.12	3.29
La Mesa	2.3	2.49
National City	3.41	3.47
Oceanside	2.8	2.81
San Diego	2.6	2.72
San Marcos	3.05	3.17
Santee	2.72	2.86
Vista	3.13	3.19
Total County	**2.75**	**2.87**

Sources: U.S. Census Bureau, 2010 Census; American Community Survey, 2013-2017.

C. Special Needs Groups

Certain households and residents, because of their special characteristics and needs, have greater difficulty finding decent and affordable housing. These circumstances may be related to age, family characteristics, or disability. Table 17 shows a summary of this section and the special needs groups present in San Diego County. The following discussion highlights particular characteristics that may affect access to housing in a community.

Table 17: Residents with Special Needs

Special Needs Group	Number	Percent of County
Households with a Senior (65+)	242,017	21.8%
Senior Persons (65+)	425,217	12.9%
Large Households	129,627	11.7%
Female Headed Households w/Children	80,886	7.3%
Disabled Persons	312,565	9.8%
HIV/AIDS	13,643	0.4%
Homeless Persons (Urban and Rural)	8,102	0.2%
Farm Workers	8,308	0.3%
Active Duty Military Personnel	143,000	4%
Veterans	225,694	7%

Sources: American Community Survey 2013-2017; San Diego Regional Task Force on the Homeless, Annual Report on the Homeless 2019; San Diego Military Advisory Council, San Diego Military Economic Impact Study, 2019; County of San Diego Health and Human Services Agency, HIV Epidemiology Report, 2016.

1. Seniors

Seniors (persons age 65 and above) are gradually becoming a more substantial segment of a community's population. Americans are living longer than ever before in our history and are expected to continue to do so. Senior households are vulnerable to housing problems and housing discrimination due to limited income, prevalence of physical or mental disabilities, limited mobility, and high health care costs. Seniors, particularly those with disabilities, may face increased difficulty in finding housing accommodations and may become victims of housing discrimination or fraud. Seniors sometimes face discrimination in the rental housing market, often based on the perception of increased risks and liabilities associated with the frail conditions or disabilities of senior tenants. A senior on a fixed income can face great difficulty finding safe and affordable housing. Subsidized housing and federal housing assistance programs are increasingly challenging to secure and often involve a long waiting list.

According to the 2013-2017 ACS, 12.9 percent of all residents in San Diego County were ages 65 and over. The proportion of residents over the age of 65 years ranged from a low of 9.7 percent in Vista to a high of 25.6 percent in Del Mar (Table 9). ACS data (2013-2017) estimates that 21.8 percent of households in San Diego County had at least one individual who was 65 years of age or older (Table 18). According to HUD's 2012-2016 Comprehensive Housing Affordability Strategy (CHAS) data, a higher proportion (53.0 percent) of seniors had low and moderate incomes compared to all county residents (45.6 percent).

Table 18: Senior Profile – San Diego County

Residents	Percent of Population	Percent with a Disability	Percent Households with Low/Moderate Incomes	Percent Households with Housing Problems
Seniors	12.9%	33.7%	53.0%	40.5%
All Residents	100.0%	9.5%	45.6%	45.4%

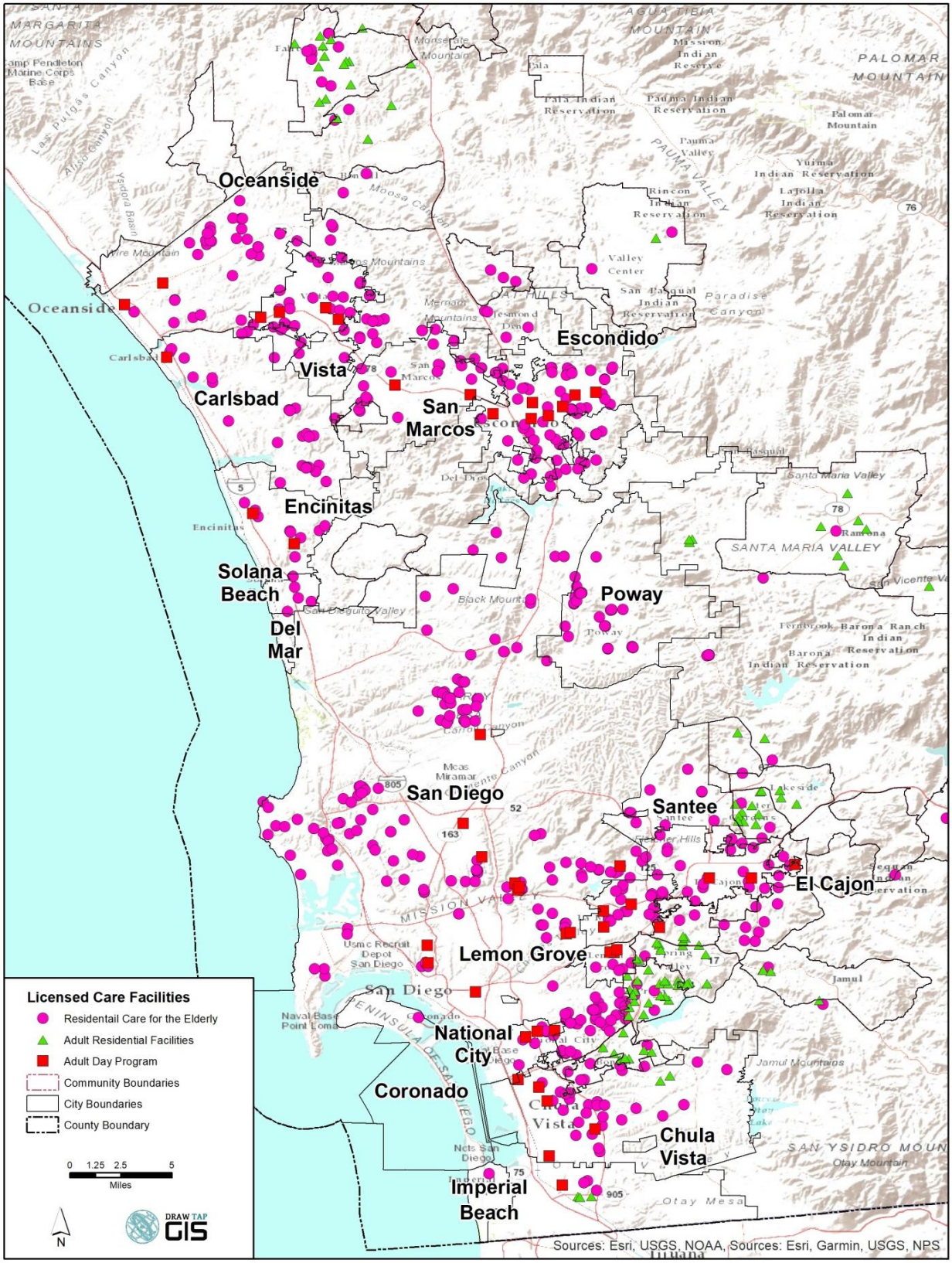
Sources: 2013-2017 American Community Survey (ACS); HUD Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.

The San Diego County Health and Human Services Agency's Aging & Independence Services (AIS) 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 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. In addition to affordable housing located near transportation, the housing needs of seniors include supportive housing, such as intermediate care facilities, group homes, and other housing with a planned service component. 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 the senior population throughout the county. 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 3 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. 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. In the City of San Diego clusters of care facilities can be seen in the southern portion of the City and in the Mira Mesa area.

Figure 3: Licensed Care Facilities



2. Large Households

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.

As indicated in Table 19, 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 19: Large Households

City/Area	Total Large Households		Large Owner Households		Large Renter Households	
	#	% of Total Households	#	% of Owner Households	#	% of Renter Households
Urban County						
Coronado	484	5.7%	137	3.3%	347	8.1%
Del Mar	40	1.9%	40	3.5%	0	0.0%
Imperial Beach	1,291	14.6%	352	12.5%	939	15.6%
Lemon Grove	1,285	15.3%	832	18.3%	453	11.7%
Poway	2,121	13.5%	1,435	12.2%	686	17.0%
Solana Beach	197	3.4%	177	5.3%	20	0.8%
Unincorporated	20,110	12.5%	12,726	11.7%	7,384	14.2%
Total Urban County	25,528	12.2%	15,699	11.5%	9,829	13.4%
Entitlement Cities						
Carlsbad	2,924	6.8%	1,921	6.8%	1,003	6.6%
Chula Vista	14,116	18.0%	8,421	18.5%	5,695	17.3%
El Cajon	5,243	16.1%	1,355	10.9%	3,888	19.3%
Encinitas	1,347	5.5%	876	5.7%	471	5.4%
Escondido	8,414	18.6%	3,305	14.7%	5,109	22.5%
La Mesa	1,588	6.7%	680	6.9%	908	6.6%
National City	3,073	19.0%	1,183	22.7%	1,890	17.2%
Oceanside	6,883	11.1%	3,252	9.4%	3,631	13.3%
San Diego	49,569	10.0%	22,901	9.8%	26,668	10.1%
San Marcos	4,192	14.4%	1,998	11.2%	2,194	19.4%
Santee	1,916	9.8%	1,164	8.7%	752	12.5%
Vista	4,834	15.8%	1,654	11.0%	3,180	20.5%
Total County	129,627	11.7%	64,409	10.9%	65,218	12.5%

Source: American Community Survey, 2013-2017.

3. Families with Children and Single-Parent Families

Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex, confine them to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether, which would violate fair housing laws. Housing discrimination against families with children can also be masked as overcrowding issues. Even when housing providers rent openly to families with children, there can still be an issue of illegal discriminatory policies for families once they become tenants. Neutral rules are expected to apply to all tenants equally, but once a housing provider isolates a particular group upon which to singularly implement those rules, a discriminatory practice is set in motion.

The proportion of families with dependent children was highest in the cities of Chula Vista and National City (Table 15). These communities may be more vulnerable to familial discrimination in the housing market because of their higher than average proportion of families with children.

The proportion of female-headed households decreased between 2010 and 2017 from 7.5 to 6.0 percent (Table 15). The proportion of female-headed households with children was highest in El Cajon (20.7 percent) and National City (11.8 percent). Female single-parent family households are disproportionately affected by poverty. 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). 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.

4. Persons with Disabilities

Affordability, design, location, and discrimination limit the supply of housing for persons with disabilities. Fair housing choice for persons with disabilities may be compromised based on the nature of their disability. Adaptable housing is the most critical housing need for persons with mobility limitations. Many single-family homes may not be adaptable to widened doorways and hallways, access ramps, or other features necessary for accessibility. Furthermore, multi-family units built prior to 1990 are often not wheel-chair accessible and the cost of retrofitting a home is often prohibitive. Many disabled individuals live in households where a member of the household is a homeowner. These disabled individuals are less likely to have accessible units, since the Fair Housing Act (FHA) does not apply to all owner-occupied dwelling units. Amendments to the Fair Housing Act, as well as state law, require ground-floor units of new multi-family construction with more than four units to be accessible to persons with disabilities. However, units built prior to 1989 are not required to be accessible to persons with disabilities. Older units, particularly in older multi-family structures, are very expensive to retrofit for disabled occupants because space is rarely available for elevator shafts, ramps, widened doorways, etc. The site, parking areas, and walkways may also need modifications to install ramps and widen walkways and gates. The location of housing and availability of transportation is also important because disabled people may require access to a variety of social and specialized services.

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. Persons with disabilities may request reasonable accommodations or reasonable modifications from their landlords. A reasonable accommodation is a change, exception or adjustment to a rule, policy, practice or service while a reasonable modification is a structural change made to the premises while. For example, a reasonable accommodation would include making an exception to an existing 'no pet' rule to permit a service dog. A reasonable modification could include installing a ramp for an individual who uses a wheelchair or grab bars in the bathroom.

Landlords are required to make "reasonable accommodations" to rules and policies to accommodate a tenant's disability. According to a HUD-DOJ Statement, requests for reasonable accommodations can be denied when:

> "…the request was not made by or on behalf of a person with a disability or if there is no disability related need for the accommodation. [And]… if it would impose an undue financial and administrative burden on the housing provider or it would fundamentally alter the nature of the provider's operations."[9]

In regard to reasonable modifications, landlords must allow a tenant with physical disabilities to make "reasonable modifications" to the unit in order to address accessibility issues. According to the HUD_JOJ Statement,

> "A person with a disability must have the housing provider's approval before making the modification. However, if the person with a disability meets the requirements under the Act for a reasonable modification and provides the relevant documents and assurances, the housing provider cannot deny the request."[10]

In privately owned properties, the tenant is responsible for the costs of modifications. In government subsidized housing (Section 504, housing set up for those with disabilities, etc.), the housing provider typically pays for the modification unless it is an undue administrative or financial burden.

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). The report stated that since complaints are usually based on denial of a request to make reasonable accommodations or modifications for people with disabilities, or because it involves a multi-family property that is not accessible in obvious ways that violate the Fair Housing Act., discrimination based on disability easier to detect. Discrimination against persons with disabilities also continues to be the largest category of complaints HUD receives each year (59.4 percent in 2017).[11]

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 mental retardation 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.[12]

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[9] Joint Statement of the U.S. Department of Housing and Urban Development and the U.S. Department of Justice on Reasonable Accommodations Under the Fair Housing Act (2004) -Question 7. https://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/joint_statement_ra.pdf

[10] Joint Statement of the U.S. Department of Housing and Urban Development and the U.S. Department of Justice on Reasonable Modifications Under the Fair Housing Act (2008)-Question 16 https://www.hud.gov/sites/documents/reasonable_modifications_mar08.pdf

[11] U.S. Department of Housing and Urban Development. "Annual Report on Fair Housing FY 2017-2018". (2018).

[12] U.S. Department of Housing and Urban Development. "Disability Rights in Housing." (2014). http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/inhousing. Accessed December 23, 2014.

The U.S. Census Bureau classifies disabilities into the following categories:

- **Hearing difficulty**: Deaf or having serious difficulty hearing
- **Vision difficulty**: Blind or having serious difficulty seeing, even when wearing glasses
- **Cognitive difficulty:** Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions
- **Ambulatory difficulty:** Having serious difficulty walking or climbing stairs
- **Self-care difficulty:** Having difficulty bathing or dressing
- **Independent living difficulty:** Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping

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. (Table 20). 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).

Figure 4 shows population density for persons with disabilities in San Diego County. Figure 4 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).

Of those disabilities tallied between 2013 and 2017 (as shown in Table 21), cognitive, ambulatory, and independent living disabilities were the most prevalent. The senior population had a significantly larger percentage of all disability types. 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 should grow considerably, commensurate with the projected growth of this population.

As previously stated, there are approximately 593 State-licensed residential care facilities for the elderly, 401 adult residential facilities, and 60 adult day care facilities throughout the county. These licensed care facilities have a combined capacity of just over 28,000 beds.

Persons with Developmental Disabilities: As defined by federal law, "developmental disability" means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22[13];
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self- sufficiency; and
- Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

According to the U.S. Administration on Developmental Disabilities (ADD), the percentage of the population that can be defined as developmentally disabled is approximately 1.5 percent. The Census does not specifically record developmental disabilities. However, using the ADD percentage to create an estimate, based on the 2019 Department of Finance population estimates, this equates to just over 50,000 persons in the County of San Diego.

The San Diego Regional Center provides a range of services to persons with or affected by developmental disabilities. Services include diagnostic and eligibility assessments, program planning, case management, and other services and supports. The San Diego Regional Center has four offices in the county and is one of 21 non-profit regional centers in California providing lifelong services and support for people with developmental disabilities residing in San Diego and Imperial Counties. As of June 2018, the Regional Center had just over 27,000 clients living in San Diego County. The ARC of San Diego 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.

[13] The State of California defines developmental disabilities slightly differently than federal law. The main difference is at the manifestation age, where California established that threshold at age 18.

Table 20: Disability by Age

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%**

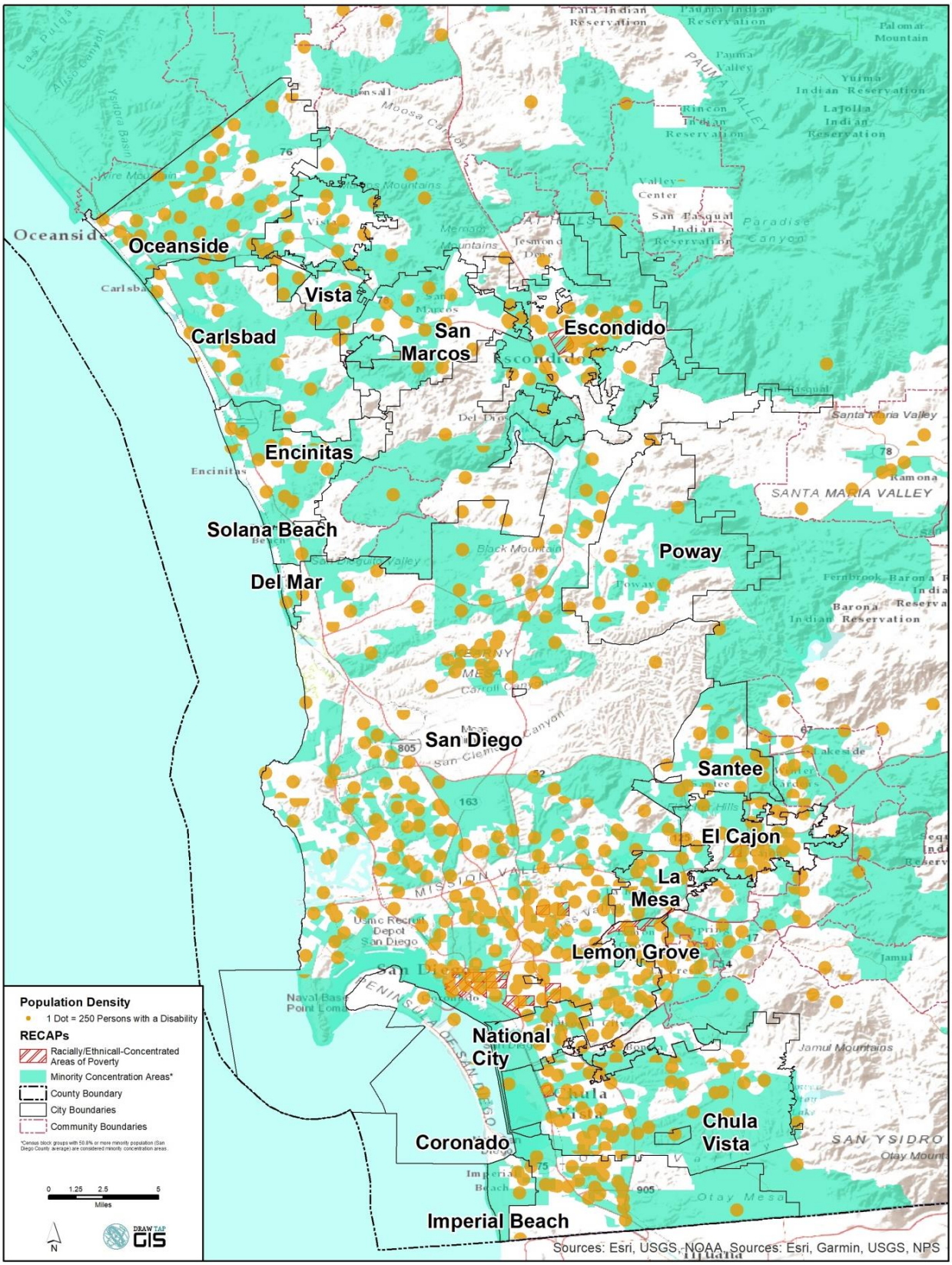
Source: American Community Survey, 2013-2017.

Table 21: Disability Characteristics

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

Figure 4: Persons with Disabilities



5. Persons with HIV/AIDS[14]

The Fair Housing Amendments Act of 1988, which is primarily enforced by HUD, prohibits housing discrimination against persons with disabilities, including persons with HIV/AIDS. California has the largest number of HIV and third largest number of AIDS cases in the United States; San Diego County has the third largest number of people living with HIV and AIDS in California. Since the HIV epidemic began in 1981, nearly 30,785 HIV or AIDS cases have been reported in San Diego County. New drugs, better treatment, and preventative education have reduced the number of fatalities. Persons with HIV/AIDS are living longer.

Of 13,643 PLWHA in San Diego County as of December 2016, 7,395 were diagnosed within the county (Table 23). The City of San Diego had the greatest proportion of diagnoses (67.8 percent), followed by Chula Vista (6.5 percent) and Oceanside (3.2 percent). Trailing behind were the communities in unincorporated areas, where only 2.7 percent of the county's PLWHA were diagnosed.

Individuals diagnosed with HIV or AIDS in San Diego County are most commonly white, male, more than 49 years of age, and have had male-to-male sexual contact. Over the course of the epidemic, there has been a slow increase in the proportion of cases affecting people of color. The percentage of people of color who have been diagnosed with HIV disease has continued to increase over time, from 28 percent in the 1980s to 53 percent in 2016. The average age of HIV diagnosis has also increased from 34 years in 2007-2011 to 36 by 2012-2016. In 2016, 499 new HIV diagnoses were reported in the county, which is near the lower end of the overall range of cases reported annually since 2007 (481-619 cases).

The primary source of funding for HIV/AIDS housing is HUD's Housing Opportunities for Persons with AIDS (HOPWA) program. The City of San Diego is the HOPWA program grantee, but all HOPWA programs are administered by the County of San Diego Department of Housing and Community Development (HCD). Established in 1992, the HOPWA program is designed to provide States and localities with resources and incentives to develop long-term comprehensive strategies that meet the housing and housing-related support service needs of low-income persons living with HIV/AIDS or related diseases and their families. In FY 2020 (HUD PY 2019) , the City of San Diego's Annual Action Plan included a $5.1 million budget for HOPWA programs ($4.2 million from the 2019 Program Year entitlement allocation and $1.4 million from prior year funds). Programs funded through the HOPWA must be housing related and designed to[15]:

- Provide affordable housing for low-income persons living with HIV/AIDS and their families;
- Enable low-income persons living with HIV/AIDS and their families to become housed;
- Provide services needed to enable low-income HIV/AIDS clients to remain housed, locate housing, and prevent homelessness.

Several HOPWA-funded housing resources (Table 23) are in place; however, there are many more people looking for housing than there are units available, particularly affordable housing units.

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14 All statistics in Persons with HIV/AIDS section are taken from the "HIV/AIDS Epidemiology Report 2016" (County of San Diego Health and Human Services Agency, 2016) unless otherwise noted.

15 City of San Diego, Fiscal Year 2020-2024 Consolidated Plan. (2019)

Table 22: People living with HIV and AIDS (PLWHA)

City/Community	CPLWHA[2]	Percent
Urban County		
Coronado	21	0.3%
Del Mar	<20	-
Imperial Beach	48	0.6%
Lemon Grove	53	0.7%
Poway	26	0.4%
Solana Beach	<20	-
Unincorporated	202	2.7%
Entitlement Cities		
Carlsbad	88	1.2%
Chula Vista	478	6.5%
El Cajon	183	2.5%
Encinitas	37	0.5%
Escondido	125	1.7%
La Mesa	105	1.4%
National City	136	1.8%
Oceanside	239	3.2%
San Diego	5,014	67.8%
San Marcos	53	0.7%
Santee	57	0.8%
Vista	122	1.6%
Other[3]	195	2.6%
Other[4]	213	2.9%
Total County	**7,395**	**100.0%**

Notes:

1. Place of residence at time of diagnosis does not represent the place of HIV diagnosis/exposure.
2. Of those known to be diagnosed with HIV in San Diego County and currently living in San Diego County through 12/31/2016.
3. Other communities: San Ysidro, La Jolla, and Camp Pendleton
4. Communities with <5 recent cases or <20 PLWHA: Alpine, Bonsall, Borrego Springs, Boulevard, Campo, Camp Pendleton, Cardiff-by-the-Sea, Del Mar, Jamul, Julian, Pala, Pauma Valley, Rancho Bernardo, Rancho Santa Fe, Santa Ysabel, Solana Beach, Valley Center, Warner Springs.

Source: HIV/AIDS Epidemiology Report 2016. County of San Diego Health and Human Services Agency.

Table 23: HOPWA Program Resources

Agency/Program	Units/Program Capacity
Emergency Housing	
Townspeople - Provides emergency beds in the form of hotel/motel vouchers for up to 21 nights.	4,120
Licensed Care Facility	
Fraternity House, Inc. - Provides 18 beds through Fraternity House (8) and Michaelle House (10) for consumers who need 24-hour comprehensive care.	20
Recovery Housing	
Stepping Stone of San Diego - Provides 15 beds through its Residential Treatment Program located in the City Heights area in San Diego.	6
Transitional Group Home	
St. Vincent de Paul Village, Inc. - Provides 38 beds through its five Josue Homes for consumers who are ambulatory, self-sufficient and recovering substance abusers.	88
Stepping Stone of San Diego - Provides 17 beds through Enya House for consumers who have a minimum of 60 days sobriety and a commitment to long term recovery.	17
Permanent Housing	
Community Housing Works/Marisol Apartments - 10 units in Oceanside for consumers and their families. Support services are provided.	10
Community Housing Works/Old Grove - 4 units in Oceanside for consumers and their families. Support services are provided.	4
Mariposa Apartments - 2 units in San Marcos for consumers and their families.	2
Mercy Gardens - 23 units in the Hillcrest area in San Diego for consumers and their families.	23
Paseo del Oro Apartments - 5 units in San Marcos for consumers and their families.	5
Shadow Hills - 5 units in Santee for consumers and their families.	5
Sierra Vista Apartments - 5 units in San Marcos for consumers and their families.	5
South Bay Community Services/La Posada - 12 units in San Ysidro for consumers and their families. Case management and support services are provided.	12
Sonoma Court Apartments - 2 units in Escondido for consumer and their families.	2
Spring Valley Apartments - 9 units in Spring Valley for consumers and their families.	9
The Center- Sunburst Apartments - 3 units for consumers who are between 18 -24 years of age.	3
Townspeople – 34th Street Apartments - 24 units in San Diego for consumers and their families. Case Management services are provided.	524
Townspeople – Vista del Puente Apartments - 12 units in San Diego for consumers and their families. Case Management services are provided.	12
Townspeople – 51st Street Apartments - 3 units in San Diego for consumers and their families. Case Management services are provided.	3
Townspeople – Wilson Avenue Apartments - 4 units in San Diego for consumers and their families. Case Management services are provided.	4
Tenant Based Rental Assistance	
County of San Diego, Housing and Community Development (HCD) – Program provides rent subsidies/vouchers for up to 80 consumers. Applicants are placed on a waiting list and preference is given to extremely low-income households with at least one family member having an AIDS diagnosis.	80

August 2019. County of San Diego Health & Human Services Agency, August 2019.

6. Homeless

While homelessness is not a protected class, homeless persons are likely to belong to a protected class (e.g. Medical condition, disability). HUD defines homelessness in the following categories:

- **Category 1 (Literally Homeless):** Individual or family who lacks a fixed, regular, and adequate nighttime residence.
- **Category 2 (Imminent Risk of Homelessness):** Individual or family who will imminently lose their primary nighttime residence.
- **Category 3 (Homeless under Other Federal Assistance):** Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition.
- **Category 4 (Fleeing/Attempting to Flee Domestic Violence):** Any individual or family who is fleeing, or is attempting to flee, domestic violence; has no other residence; and lacks the resources or support networks to obtain other permanent housing.

Fair Housing Also Applies to Homeless Shelters

In 2013, the U.S. Department of Housing and Urban Development (HUD) charged a homeless shelter in Pennsylvania and one of its employees with refusing to accept a blind man and his guide dog at a homeless shelter. HUD's investigation found that the homeless man was denied a reasonable accommodation request to allow the man to keep his dog in the shelter, in violation of the Fair Housing Act.

This definition demonstrates the diversity of people experiencing homelessness. The numerous places where people experiencing homelessness can be located complicate efforts to accurately estimate their total population. For example, an individual living with friends on a temporary basis could be experiencing homelessness, but would be unlikely to be identified in a homeless count. Since 2006, the San Diego Regional Task Force on the Homeless (RTFH) has conducted a point-in-time survey (PIT) to measure the county's homeless population, as well as to identify the needs of persons experiencing homelessness. The 2019 San Diego Regional Homeless Point-In-Time Count took place on the night of January 25, 2019. The 2019 PIT count identified 8,102 homeless persons living in San Diego County (Table 24). Of the homeless persons counted, more than half (54.6 percent) were unsheltered – living in a place not meant for human habitation, while 24.8 percent were in an emergency shelter and 19.2 percent in a transitional housing program. When examining the different sub-regions within San Diego County, the City of San Diego had the largest proportion of the homeless persons (63.4 percent), followed by El Cajon with 9.8 percent of the region's homeless persons.

Since 2014, the total number of sheltered and unsheltered homeless persons enumerated during the annual PIT decreased by approximately five percent. Despite the overall decrease in homeless persons, the proportion of unsheltered persons has increased by 8.4 percentage points. The number of homeless persons sheltered on the selected night decreased by 20 percent over the five-year period (4,521 in 2014 to 3,635 in 2019), while the number of unsheltered homeless persons counted increased by 12.3 percent (3,984 in 2014 to 4,476 in 2019). Many homeless service providers attributed the overall decrease to the new "Housing First" model and the Continuum of Care system (described later). This approach recognizes many people cannot to address their other issues (e.g., employment, health, and emotional) until they have a more stable housing arrangement.

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.

In addition, the 2019 PIT count used new methodology under HUD guidance "to survey a higher percentage of those experiencing homelessness where you meet them and to count people rather than structures or vehicles." [16] The change in methodology resulted in changes in the PIT counts from previous years.

Table 24: Homelessness Population by Jurisdiction – 2018 and 2019

Jurisdiction	2018				2019			
	Sheltered	Unsheltered	Total	% of County	Sheltered	Unsheltered	Total	% of County
Urban County								
Coronado	0	6	6	0.1%	0	1	1	0.0%
Del Mar*	0	3	3	0.0%	--	6--	6--	--
Imperial Beach	0	20	20	0.2%	0	12	12	0.1%
Lemon Grove	0	52	52	0.6%	0	35	35	0.4%
Poway	0	15	15	0.2%	0	9	9	0.1%
Solana Beach*	0	0	0	0.0%	--	--	4--	--
Unincorporated	6	445	451	5.3%	0	224	224	2.8%
Entitlement Cities								
Carlsbad	58	152	210	58	59	102	161	2.0%
Chula Vista	108	229	337	108	79	242	321	4.0%
El Cajon	391	288	679	391	489	298	787	9.8%
Encinitas	39	86	125	39	41	79	120	1.5%
Escondido	148	263	411	148	109	241	350	4.4%
La Mesa	29	12	41	29	0	46	46	0.6%
National City	32	201	233	32	0	94	94	1.2%
Oceanside	157	326	483	157	202	193	395	4.9%
San Diego	2,282	2,630	4,912	2,282	2,482	2,600	5,082	63.4%
San Marcos	0	62	62	-	0	46	46	0.6%
Santee	0	46	46	-	0	35	35	0.4%
Vista	336	154	490	336	174	122	296	3.7%
Total County	**3,586**	**4,990**	**8,576**	**3,586**	**3,635**	**4,379**	**8,014**	**100.0%**

Notes: The 2019 San Diego Regional Homeless Profile indicate 8,102 persons enumerated in the Point-in-Time Count. The data presented in the report indicates only 8,014.
* Del Mar and Solana Beach counts reported under the Encinitas community totals.
Source: San Diego Regional Taskforce on the Homeless 2019 Annual Report on Homelessness in the San Diego Region.

[16] San Diego Regional Taskforce on the Homeless 2019 Annual Report on Homelessness in the San Diego Region.

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.

A variety of public and nonprofit agencies in San Diego County also offer services to assist individuals and families in obtaining and maintaining adequate housing, including those who are currently homeless as defined by HUD and formerly homeless persons. These agencies administer programs that include rental assistance, housing rehabilitation, shared housing, public housing, and home purchasing assistance.

7. Farm Workers

As traditionally defined, farm workers are persons whose primary incomes are earned through permanent or seasonal agricultural labor. Permanent farm workers tend to work in fields or processing plants. During harvest periods when workloads increase, the need to supplement the permanent labor force is satisfied with seasonal workers. Often these seasonal workers are migrant workers, defined by the inability to return to their primary residence at the end of the workday. Determining the actual number of farm workers in a region is difficult due to the variability of the definitions used by government agencies and other peculiarities endemic to the farming industry. Agricultural work can include weeding, thinning, planting, pruning, irrigation, tractor work, pesticide applications, harvesting, transportation to the cooler or market, and a variety of jobs at packing and processing facilities.

According to 2013-2017 ACS data, just over 8,300 residents of San Diego County were employed in farming, fishing, or forestry occupations. Estimates provided by other governmental agencies include 8,700 (Total Farm Employment, California Employment Development Department, 2019). The number of farm workers, however, varies depending upon the different growing seasons. The numbers can change quickly as more work becomes available. This population remains highly migratory, following the work as it becomes available and even returning home for short periods during the off-season.

Just under one-third of the estimated farm worker population is located in the unincorporated county areas. The Cities of Escondido, Vista, and San Diego had the greatest proportions of farm worker population (17.8 percent for Escondido and San Diego, 13.5 percent in Vista).. The geographic distribution of farm workers in San Diego County generally corresponds with agricultural production areas. According to the California Department of Conservation's farmland maps, agricultural production in the county is concentrated in the unincorporated north inland areas of the county around Interstate 15, north of the cities of Vista, San Marcos, and Escondido, and west of the Cleveland National Forest areas. County land use data also indicated that most agricultural activity consists of orchards and vineyards or field crops. Only a small portion of agricultural land is used for intensive agricultural uses.

Table 25: Farm Worker Population of San Diego County

Jurisdiction	# of Persons	Percent of All Persons Employed in Farming, Fishing, and Forestry Occupations
Urban County		
Coronado	0	0.0%
Del Mar	0	0.0%
Imperial Beach	0	0.0%
Lemon Grove	22	0.3%
Poway	0	0.0%
Solana Beach	33	0.4%
Unincorporated	2,540	30.6%
Total Urban County	2,595	31.2%
Entitlement Cities		
Carlsbad	125	1.5%
Chula Vista	190	2.3%
El Cajon	64	0.8%
Encinitas	39	0.5%
Escondido	1,477	17.8%
La Mesa	73	0.9%
National City	92	1.1%
Oceanside	640	7.7%
San Diego	1,478	17.8%
San Marcos	405	4.9%
Santee	10	0.1%
Vista	1,120	13.5%
Total County	**8,308**	**100.0%**

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

Although there exists little consensus as to the number of farm workers in San Diego County, analysis reveals that this group has special housing needs. According to San Diego County's 2017 Housing Element Background Report, farmworker housing constitutes a critical housing need in the unincorporated area due to the year-round agricultural production that generates a permanent presence of farm labor force. The median size of a farm San Diego County is less than 10 acres. These small, non-traditional farms often employ temporary workers but are not large enough to accommodate on-site farmworker housing. These rural homeless persons typically reside in camps located throughout the county. These encampments are generally small in size and are frequently at the edge of their employer's property in fields, hillsides, canyons, ravines, or riverbeds. According to the Regional Task Force on the Homeless (RTFH), most of these homeless workers are undocumented immigrants whose families reside elsewhere.[17] Due to the migratory nature of these farmworkers, the camps typically are temporary establishments and are not legally permitted. Consequently, this population is often under-counted. The

[17] Regional Homeless Profile October 2006, Regional Task Force on the Homeless, http://www.rtfhsd.org/docs_profile/unincorporated.doc. As cited in the 2017 Housing Element Background Report.

RTFH reports that much of the recent information they have acquired is anecdotal and that camps have been dwindling.

California Employment Development Department (EDD) estimates that the average salary for farm workers and laborers working in the Farming, Fishing, and Forestry Occupations in the San Diego-Carlsbad-San Marcos MSA in 2019 was approximately $32,872, less than half of the average $68,049 for full-time, year-round workers with earnings. Given the relatively low incomes of farmworker households, an increasingly important need for the permanently employed farmworkers is affordable rental housing.. Low wages, high housing costs, and seasonal nature of this occupational category means many farm workers are homeless at their place of employment while their families may reside elsewhere.

Farm workers can benefit from programs and services that provide assistance to lower and moderate-income households in general, such as the Housing Choice Voucher program, which offers rental assistance to residents. According to the County of San Diego Housing Resources Directory 2020, one development in the City of San Marcos (Firebird Manor) and one in Fallbrook (Fallbrook View Apartments) provide 98 units of affordable housing for farm workers and their families. In addition, 40 affordable units at Old Grove Apartments in the City of Oceanside are reserved for farm workers and and/or Day Laborers.

8. Military Personnel and Veterans

San Diego is one of the largest military regions in the United States. The county is the third largest in the U.S. in terms of veteran residents, and the number one destination for veterans returning from Iraq and Afghanistan as of 2013.[18] San Diego County has a strong military personnel presence due to the various large military bases, including Naval Air Station North Island, Naval Station San Diego, Naval Base Point Loma, Marine Corps Air Station Miramar, and Marine Corps Base Camp Pendleton. The military population increases the demand for low-cost rental housing. Military personnel generally earn lower incomes and their length of residency is often uncertain. Although the need is partially met by the supply of military housing, the demand outweighs the supply. Eligibility for military housing is based on pay grade (which is based on rank) and family size. In addition to housing concerns, veterans may experience specific difficulties when reintegrating into the civilian labor force. These include: trouble translating military experience to civilian work, lack of resume, job search, and interview experience; time needed to "decompress;" and health issues (physical and mental) from military service.[19]

Although one percent of the U.S. population lives in San Diego County, the region is home to more than five percent of the active duty U.S. military population. Approximately 143,000 active duty personnel are stationed in San Diego County. The 2013-2017 ACS data estimates that veterans made up seven percent (225,694 persons) of the population in the county. The City of San Diego was home to a plurality of the regional veteran population (40 percent).

[18] County of San Diego and San Diego Regional Chamber of Commerce, "Military Employment in San Diego" (January 2013).

[19] *Id.*

Due to the region's high cost of living, many families at the lower range of pay and housing allowance barely meet the California Family Needs Standard[20] (formerly the Self-Sufficiency Standard) for San Diego. The Family Needs Calculator measures the minimum income necessary to cover all of a non-elderly (under 65 years old) and non-disabled individual or family's basic expenses – housing, food, child care, health care, transportation, and taxes – without public or private assistance. According to the Calculator, 35 percent of households in San Diego County live below the "standard." The 2019 Regional Homeless Profile estimates that six percent (446 persons) of all homeless adult persons in San Diego (8,102 persons), at a single point in time, were veterans of the U.S. Armed Forces and nearly half of the homeless veterans were chronically homeless.[21]

Housing and supportive service needs for military personnel are addressed by the Department of Defense, while the needs of veterans are addressed at the community level. The Veteran Services division of the County's Health and Human Services Agency provides benefit information and assistance, plus other support to San Diego County veterans and their families. Services offered through Veterans Services includes comprehensive benefits counseling, claims preparation and submission, claims follow-up to ensure final decisions, initiation and development of appeals, and networking and advocacy with federal, state and local agencies.

The Veteran's Village of San Diego (VVSD) provides a continuum of care with a full range of comprehensive and innovative services for military veterans. VVSD has five locations throughout San Diego County where they provide services to more than 3,000 military veterans annually.

D. Hate Crimes

Hate crimes – violent acts against people, property, or organizations motivated by a bias related to victim's race, ethnicity, religion, gender, sexual orientation, national origin, or physical or mental disability – become a fair housing concern when residents are intimidated or harassed at their residence or neighborhood. Fair housing violations due to hate crimes also occur when people will not consider moving into certain neighborhoods or have been run off from their homes for fear of harassment or physical harm. The federal Fair Housing Act makes it illegal to threaten, harass, intimidate or act violently toward a person who has exercised their right to free housing choice. Persons who break the law have committed a serious crime and can face time in prison, large fines or both, especially for violent acts, serious threats of harm, or injuries to victims. In addition, this same behavior may violate similar state and local laws, leading to more punishment for those who are responsible. Some examples of illegal behavior include threats made in person, writing or by telephone; vandalism of the home or property; rock throwing; suspicious fires, cross-burning or bombing; or unsuccessful attempts at any of these. The Matthew Shepard and James Byrd, Jr. Hate Crimes Prevention Act of 2009 greatly expanded the federal government's ability to prosecute hate crimes without having to show that the defendant was engaged in a federally protected activity. The Shepard-Byrd Act also empowers the department to prosecute crimes committed because of a person's sexual orientation, gender identity, gender or disability as hate crimes.

The FBI's Uniform Crime Reporting (UCR) Program releases Hate Crime Statistics annually. Table 26 shows that 71 hate crimes were reported in San Diego County in 2018. The jurisdiction with the largest

[20] The Self-Sufficiency Standard for California, 2018. Center for Women's Welfare, University of Washington. Based on U.S. Census Bureau, 2016 American Community Survey 1-Year Public Use Microdata Sample.

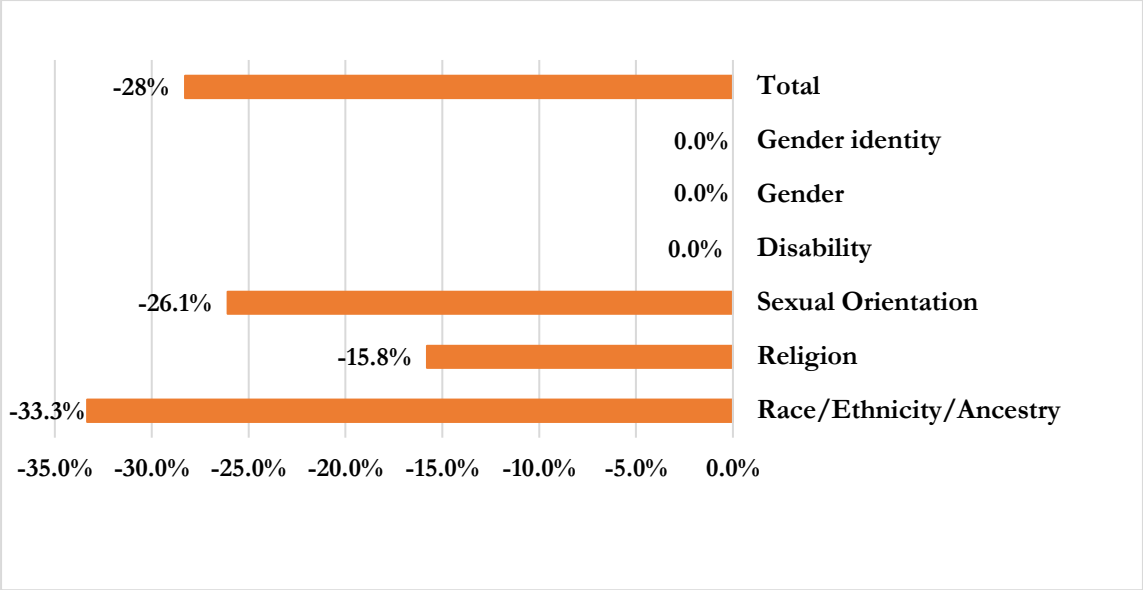
[21] San Diego Regional Taskforce on the Homeless, "2019 San Diego Regional Homeless Profile".

number of hate crimes was the City of San Diego (40 cases). More than half of reported hate crimes appear to have been motivated by the victim's race, ethnicity, or ancestry. Close to a quarter of reported hate crimes appear to be motivated by the victim's sexual orientation and another 23 percent of hate crimes by religion. However, observations by staff and service providers indicated a spike in hate crimes by religion in 2019.

Hate crimes of all motivations have declined in San Diego region by 28 percent between 2013 and 2018 (Figure 5). However, reporting hate crimes is voluntary on the part of the local jurisdictions. Some states started submitting data only recently, and not all jurisdictions are represented in the reports. Many jurisdictions across the country, including those with well-documented histories of racial prejudice, reported zero hate crimes. Another obstacle to gaining an accurate count of hate crimes is the reluctance of many victims to report such attacks.

However, the incidence of hate crimes appear to be increasing since 2018. While 2019 crime reports have not been published as of April 2020, some jurisdictions reported an increase in hate crimes based on religion in 2019. A study by the California State University of San Bernardino reported 15 hate crimes on between January 1 and May 31 in the City of San Diego with religion being the top bias for these hate crimes[22]. In addition, on April 2020, the San Diego County District Attorney launched a hate crime online reporting form and hotline in response to reported incidents of hate crimes against Asian Americans as a result of COVID-19. Whether these are situational upticks or the beginning of trends remains to be seen.[23]

Figure 5: Change in Hate Crimes between 2013 and 2018



Source: U.S. Federal Bureau of Investigation, Hate Crime Statistics, 2018.

[22] Center for the Study of Hate and Extremism. "Factbook on hate & extremism in the U.S. & internationally" (2019). California State University of San Bernardino.

[23] City News Service. "DA launches hate crime hotline due to incidents against Asians during pandemic" (April 30, 2020). Fox 5 News San Diego.

Table 26: Hate Crime Statistics – 2018

Jurisdiction	Race/ Ethnicity/ Ancestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
Urban County Cities							
Coronado	0	0	0	0	0	0	0
Del Mar	0	0	0	0	0	0	0
Imperial Beach	1	0	0	0	0	0	1
Lemon Grove	0	0	0	0	0	0	0
Poway	0	1	0	0	0	0	1
Solana Beach	0	0	0	0	0	0	0
Entitlement Jurisdictions							
Carlsbad	4	2	0	0	0	0	6
Chula Vista	1	1	0	0	0	0	2
El Cajon	3	0	1	0	0	0	4
Encinitas	0	3	0	0	0	0	3
Escondido	2	0	0	0	0	0	2
La Mesa	1	0	0	0	0	0	1
National City	0	0	0	0	0	0	0
Oceanside	2	0	0	0	0	0	2
San Diego	20	8	12	0	0	0	40
San Marcos	1	0	0	0	0	0	1
Santee	1	0	0	0	0	0	1
Vista	0	0	1	0	0	0	1
San Diego County	2	1	3	0	0	0	6
Total County	**38**	**16**	**17**	**0**	**0**	**0**	**71**
Percentage	53.5%	22.5%	23.9%	0.0%	0.0%	0.0%	100.0%

Note: *Hate Crime Statistics, 2018* includes data about bias-motivated incidents reported by law enforcement agencies throughout the nation. However, no estimates are included for agencies that do not submit reports.
Source: U.S. Federal Bureau of Investigation, Hate Crime Statistics, 2018.

E. Income Profile

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.

1. Median Household Income

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 (Figure 6).

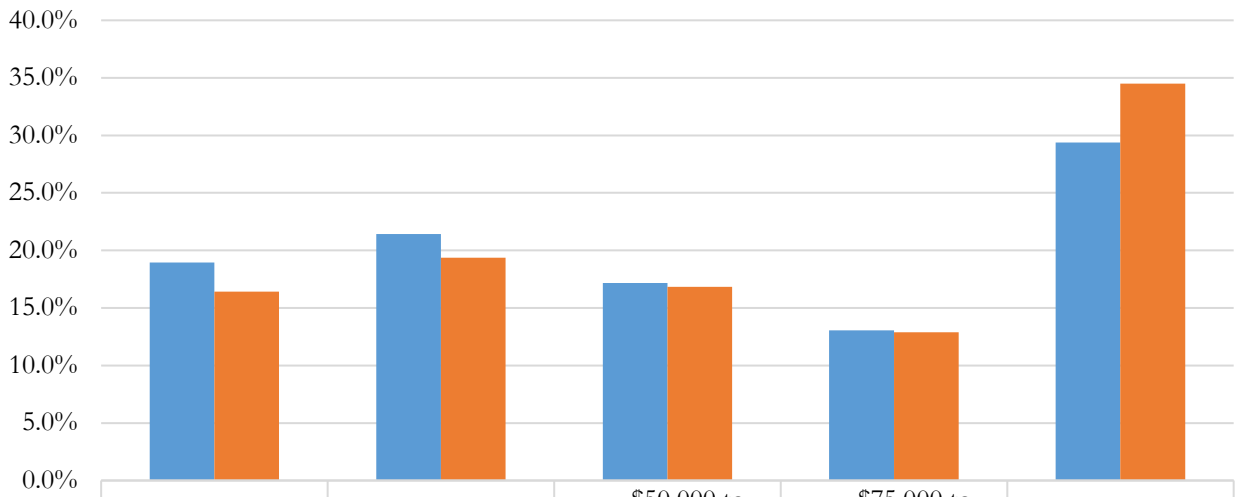
Median income between 2013 and 2017 ranged from a high of $122,563 in Del Mar to a low of $43,168 in National City (Table 27). Areas with high median household incomes are found along the coastal cities of Del Mar and Solana Beach and in Poway. The income gap between cities can be attributed to many factors, including the high cost of housing on the coast, the cities with lower incomes having significantly younger residents, having fewer professional and management employees, or having more students.

Many of the cities with lower median incomes are also cities with a higher proportion of non-white population. For instance, the percent minority population in the jurisdictions with the lowest median incomes Imperial Beach, El Cajon, and National City is 69, 44, and 90 percent, respectively. As stated earlier in this chapter, 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. In another example, per capita income for Black, Asian, and Hispanic households was five, 12 and 33 percent respectively of the county per capita income, compared with White, non-Hispanic households who earned 46 percent of the county per capita income from 2013 to 2017.

According to 2013 and 2017 ACS data, the median income in the county appears to have risen both in absolute terms and when adjusted for inflation (Table 27). Median county income jumped from $62,962 to $70,588 between 2013 and 2017, a 12-percent gain in absolute terms. However, adjusting the 2013 income to 2017, the number becomes $66,602, with a resulting change to a 6-percent increase. Even when adjusted for inflation, most cities saw an increase in median income, except for Imperial Beach which experienced a modest decline of approximately four percent during this period.[24] However, based on Figure 6, it appears that median income increases are due to the increase in the proportion of households earning more than $100,000.

[24] Inflation calculated with U.S. Department of Labor, Bureau of Labor Statistics inflation calculator https://data.bls.gov/cgi-bin/cpicalc.pl

Figure 6: San Diego County Household Income



	Less than 25,000	25,000 to $49,999	$50,000 to $74,999	$75,000 to $99,999	>$100,000
2013	18.9%	21.4%	17.2%	13.1%	29.4%
2017	16.4%	19.4%	16.8%	12.9%	34.5%

Source: American Community Survey (ACS), 2006-2010, 2013-2017.

Table 27: Median Household Income

Jurisdiction	Median Household Income 2013 (Not Adjusted for Inflation)	Median Household Income 2013 (In 2017 Inflation-Adjusted Dollars)	Median Household Income (2017)	% Change 2013-2017 (Inflation-Adjusted Dollars)
Urban County				
Coronado	$91,103	$96,371	$99,641	3.4%
Del Mar	$107,457	$113,670	$122,563	7.8%
Imperial Beach	$49,268	$52,117	$49,950	-4.2%
Lemon Grove	$51,496	$54,474	$60,309	10.7%
Poway	$93,856	$99,283	$102,338	3.1%
Solana Beach	$86,451	$91,450	$103,864	13.6%
Entitlement Jurisdictions				
Carlsbad	$83,908	$88,760	$102,722	15.7%
Chula Vista	$64,801	$68,548	$70,197	2.4%
El Cajon	$44,112	$46,663	$49,445	6.0%
Encinitas	$91,795	$97,103	$103,842	6.9%
Escondido	$49,362	$52,216	$58,834	12.7%
La Mesa	$53,605	$56,704	$59,629	5.2%
National City	$37,933	$40,126	$43,168	7.6%
Oceanside	$58,153	$61,515	$61,778	0.4%
San Diego	$64,058	$67,762	$71,535	5.6%
San Marcos	$53,657	$56,759	$70,417	24.1%
Santee	$70,899	$74,998	$81,430	8.6%
Vista	$47,346	$50,084	$59,833	19.5%
Total County	**$62,962**	**$66,602**	**$70,588**	**6.0%**
State of California	$61,094	$64,626	$67,169	3.9%

Source: Community Survey (ACS), 2009-2013 and 2013-2017; U.S. Department of Labor, Bureau of Labor Statistics.

2. Income Distribution

HUD periodically receives "custom tabulations" of Census data from the U.S. Census Bureau that are largely not available through standard Census products. The most recent estimates are derived from the 2012-2016 ACS. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low-income households. The CHAS cross-tabulates the Census data to reveal household income in a community in relation to the Area Median Income (AMI).

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. Table 28 compares the HUD and State income categories. This AI report is a HUD-mandated study and therefore HUD income definitions are used.

Table 28: Income Categories

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.

Table 29: Income Distribution, 2012-2016

Jurisdiction	Total Households	Extremely Low Income (0-30%)	Low Income (31-50%)	Moderate Income (51-80%)	Middle/Upper Income (80%+)
Urban County					
Coronado	8,980	8.6%	9.4%	14.0%	67.9%
Del Mar	2,260	16.4%	4.0%	2.2%	77.4%
Imperial Beach	9,045	20.6%	18.4%	23.0%	38.0%
Lemon Grove	8,465	14.7%	16.5%	21.8%	47.0%
Poway	15,800	8.7%	8.9%	12.9%	69.5%
Solana Beach	5,750	7.6%	7.7%	12.2%	72.5%
Entitlement Jurisdictions					
Carlsbad	42,925	10.5%	7.5%	11.2%	70.8%
Chula Vista	77,810	15.7%	13.7%	18.4%	52.3%
El Cajon	32,940	24.8%	17.8%	19.1%	38.3%
Encinitas	23,690	9.9%	9.3%	9.6%	71.1%
Escondido	45,220	18.6%	18.4%	19.1%	43.8%
La Mesa	23,770	15.2%	14.6%	19.9%	50.4%
National City	15,860	29.1%	18.1%	23.3%	29.5%
Oceanside	61,475	16.1%	13.7%	21.0%	49.2%
San Diego	490,220	15.1%	12.2%	16.6%	56.1%
San Marcos	29,125	16.6%	14.4%	18.3%	50.7%
Santee	19,520	9.1%	10.0%	18.8%	62.1%
Vista	30,635	16.5%	18.8%	21.2%	43.5%
Total County	**1,103,125**	**15.1%**	**13.0%**	**17.4%**	**54.4%**

Note: Data presented in this table is based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% count due to the need to extrapolate sample data out to total households. Interpretations of this data should focus on the proportion of households in need of assistance rather than on precise numbers.
Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

3. Income by Household Type and Race/Ethnicity

Household income often varies by household type and tenure. As shown, in Table 30, the majority of the City's extremely low, low, and moderate-income households experienced at least one housing problem and cost burden. As defined by CHAS, housing problems include:

- Units with physical defects (lacking complete kitchen or bathroom);
- Overcrowded conditions (housing units with more than one person per room);
- Housing cost burden, including utilities, exceeding 30 percent of gross income; and
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income.

Renter households were also disproportionately affected with housing problems. The percentage of owner households with housing problems was 35.1 percent between 2012 and 2016, compared to the 56.8 percent of renter households. When comparing by household types, a greater proportion of renter elderly, renter small family, and renter large family households faced housing problems than owner households of the same type.

Race/ethnicity can indicate housing need to the extent that different race/ethnic groups earn different incomes. Overall, lower-income households represented just 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 (Table 31). Proportionally fewer Asian (22.8 percent) and Non-Hispanic White households (22.9 percent) fell in the lower-income category compared to the county average.

Table 30: Housing Assistance Needs of Low and Moderate Income Households (2012-2016)

Household by Type, Income & Housing Problem	Renters				Owners				Total Households
	Elderly (65 years or older)	Small Families (1-4 members)	Large Families (5+ members)	Total Renters	Elderly (65 years or older)	Small Families (1-4 members)	Large Families (5+ members)	Total Owners	
Extremely Low Income (0-30% AMI)	**26,585**	**43,555**	**13,770**	**119,030**	**23,750**	**13,230**	**2,210**	**47,700**	**166,730**
% of Household Type	**37.2%**	**19.2%**	**24.6%**	**22.8%**	**12.4%**	**5.1%**	**3.9%**	**8.2%**	**15.1%**
#% with Any Housing Problems	74.1%	85.5%	96.8%	79.7%	69.7%	59.1%	89.6%	66.9%	76.0%
#% with Cost Burden > 30%	73.0%	84.5%	91.8%	78.1%	69.5%	58.2%	84.2%	66.1%	74.6%
Low Income (31-50% AMI)	**15,100**	**41,795**	**13,615**	**93,670**	**26,435**	**13,110**	**4,985**	**49,995**	**143,665**
% of Household Type	**21.1%**	**18.4%**	**24.3%**	**18.0%**	**13.8%**	**5.0%**	**8.7%**	**8.6%**	**13.0%**
#% with Any Housing Problems	81.0%	88.8%	95.5%	89.3%	51.3%	75.6%	84.1%	63.1%	80.2%
#% with Cost Burden > 30%	79.9%	86.1%	81.9%	85.8%	51.0%	74.3%	68.1%	61.0%	77.2%
Moderate Income (51-80% AMI)	**11,930**	**50,650**	**13,550**	**107,295**	**35,855**	**29,855**	**10,295**	**85,145**	**192,440**
% of Household Type	**16.7%**	**22.3%**	**24.2%**	**20.6%**	**18.7%**	**11.4%**	**18.0%**	**14.6%**	**17.4%**
#% with Any Housing Problems	64.4%	66.6%	82.9%	68.4%	40.5%	66.6%	74.4%	56.7%	63.2%
#% with Cost Burden > 30%	60.6%	59.3%	44.9%	59.3%	40.1%	65.3%	56.0%	53.8%	56.9%
Middle/Upper Income (81% + AMI)	**17,800**	**91,365**	**15,015**	**201,495**	**105,865**	**205,680**	**39,815**	**398,805**	**600,300**
% of Household Type	**24.9%**	**40.2%**	**26.8%**	**38.6%**	**55.2%**	**78.5%**	**69.5%**	**68.6%**	**54.4%**
#% with Any Housing Problems	26.6%	20.9%	46.5%	22.1%	19.5%	21.4%	34.4%	23.1%	22.8%
% with cost burden > 30%	23.4%	16.3%	12.5%	16.6%	19.1%	20.5%	21.4%	21.2%	19.7%
Total Households	**71,415**	**227,365**	**55,950**	**521,490**	**191,905**	**261,875**	**57,305**	**581,645**	**1,103,135**
% with Any Housing Problems	62.1%	55.9%	79.6%	56.8%	34.0%	31.2%	48.0%	35.1%	45.4%
% with Cost Burden > 30%	60.0%	51.7%	56.7%	51.9%	33.7%	30.2%	34.1%	33.1%	42.0%

Note: Data presented in this table is based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% count due to the need to extrapolate sample data out to total households. Interpretations of this data should focus on the proportion of households in need of assistance rather than on precise numbers.
Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2012-2016.

Table 31: Income by Race/Ethnicity

Income Level	All Households		Non-Hispanic White	Hispanic or Latino	Black	Asian
Extremely Low Income (0-30% AMI)	166,720	15.1%	12.3%	21.1%	21.8%	12.7%
Low Income (31-50% AMI)	143,680	13.0%	10.6%	19.8%	15.0%	10.1%
Moderate Income (51-80% AMI)	192,440	17.4%	15.6%	22.2%	19.6%	15.6%
Middle/Upper Income (81% + AMI)	600,305	54.4%	61.5%	36.9%	43.5%	61.6%
Percent of Total Households	**1,103,145**	**100.0%**	**57.6%**	**24.5%**	**4.8%**	**10.3%**

Note: Data presented in this table is based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% count due to the need to extrapolate sample data out to total households. Interpretations of this data should focus on the proportion of households in need of assistance rather than on precise numbers.
Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

4. Concentrations of Lower- and Moderate-Income Populations

Figure 7 shows the Lower and Moderate Income (LMI) areas in the county by Census block group. Determining LMI areas is important for programming Community Development Block Grant (CDBG) activities. The CDBG program requires that each CDBG funded activity must "either principally benefit low- and moderate-income (LMI) persons, aid in the prevention or elimination of slums or blight, or meet a community development need having a particular urgency." Activities may also qualify for CDBG funds if the activity will benefit all the residents of a primarily residential area where at least 51 percent of the residents are low- and moderate-income persons.

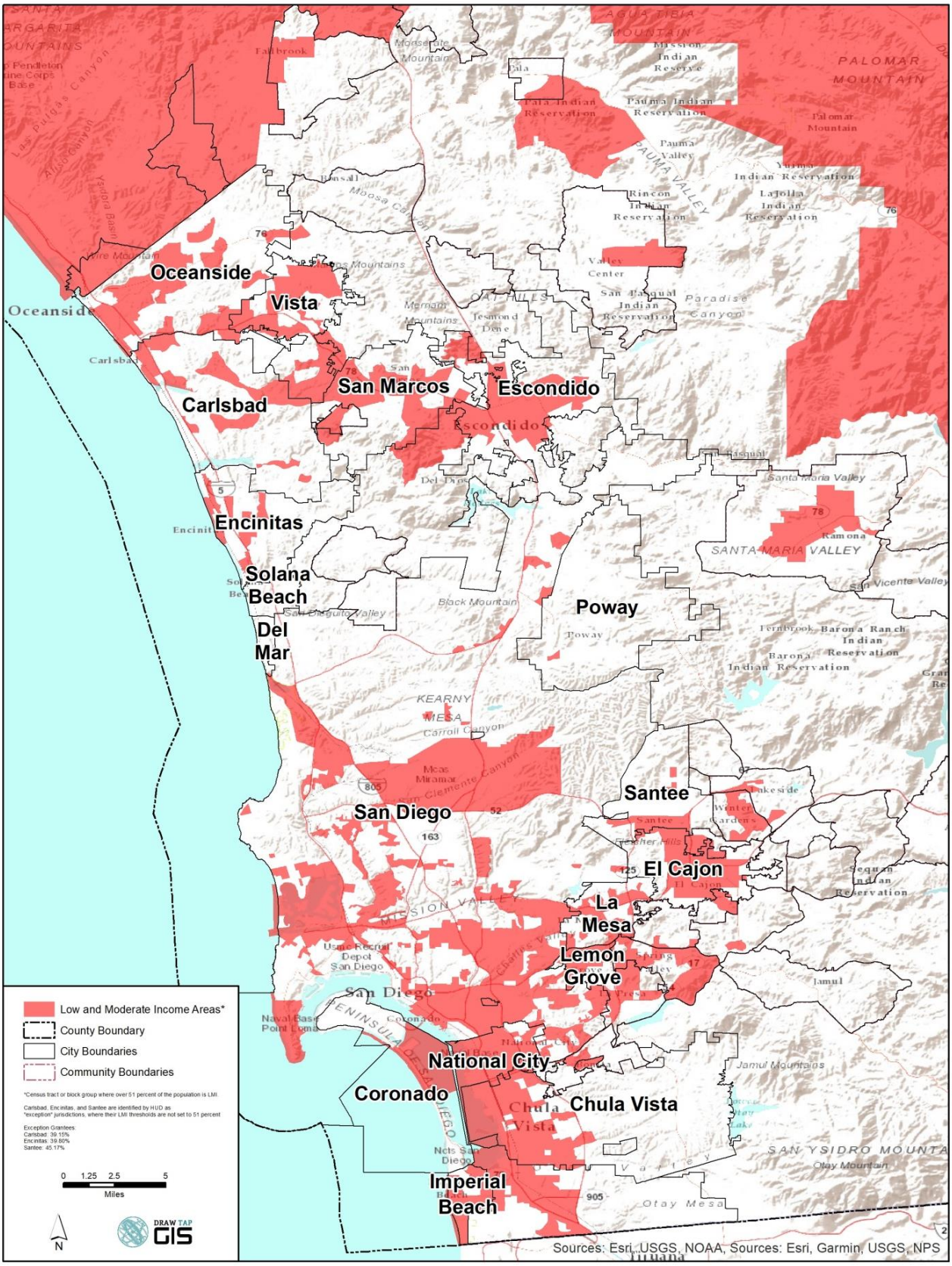
Typically, HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI. However, certain communities are higher income, with few block groups qualifying as LMI using this definition. These communities are considered "exception" jurisdictions. The cities of Carlsbad, Encinitas, and Santee are identified by HUD as "exception" jurisdictions (where their LMI thresholds are not set at 51 percent). LMI areas in these communities are defined as the top 25 percent (fourth quartile) of block groups with the highest concentration of low-and moderate-income population.

For FY 2019-20, the LMI thresholds for these "exception" jurisdictions are:

- City of Carlsbad: 39.2 percent
- City of Encinitas: 39.8 percent
- City of Santee: 45.2 percent

Low- and moderate-income (LMI) areas are concentrated in three very general areas. In the North County area, LMI areas are seen at 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.

Figure 7: Low and Moderate Income Areas



5. Concentrations of Poverty

National poverty data suggests that people living in poverty tend to be clustered in certain communities rather than being evenly distributed across geographic areas. Identifying concentrations of poverty is important because living in areas with many other poor people has been shown to places burdens on low-income families beyond what the families' own individual circumstances would dictate. Other research indicates that this concentration of poverty can result in higher crime rates, underperforming public schools, poor housing and health conditions, as well as limited access to private services and job opportunities.[25] The consequences of poverty are particularly harmful to children. Children who grow up in densely poor neighborhoods and attend low-income schools face many barriers to academic and occupational achievement.

Countywide, over 13 percent of residents (or 427,031 persons) were living below the poverty level (according to 2013-2017 ACS data).[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 8 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.

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.

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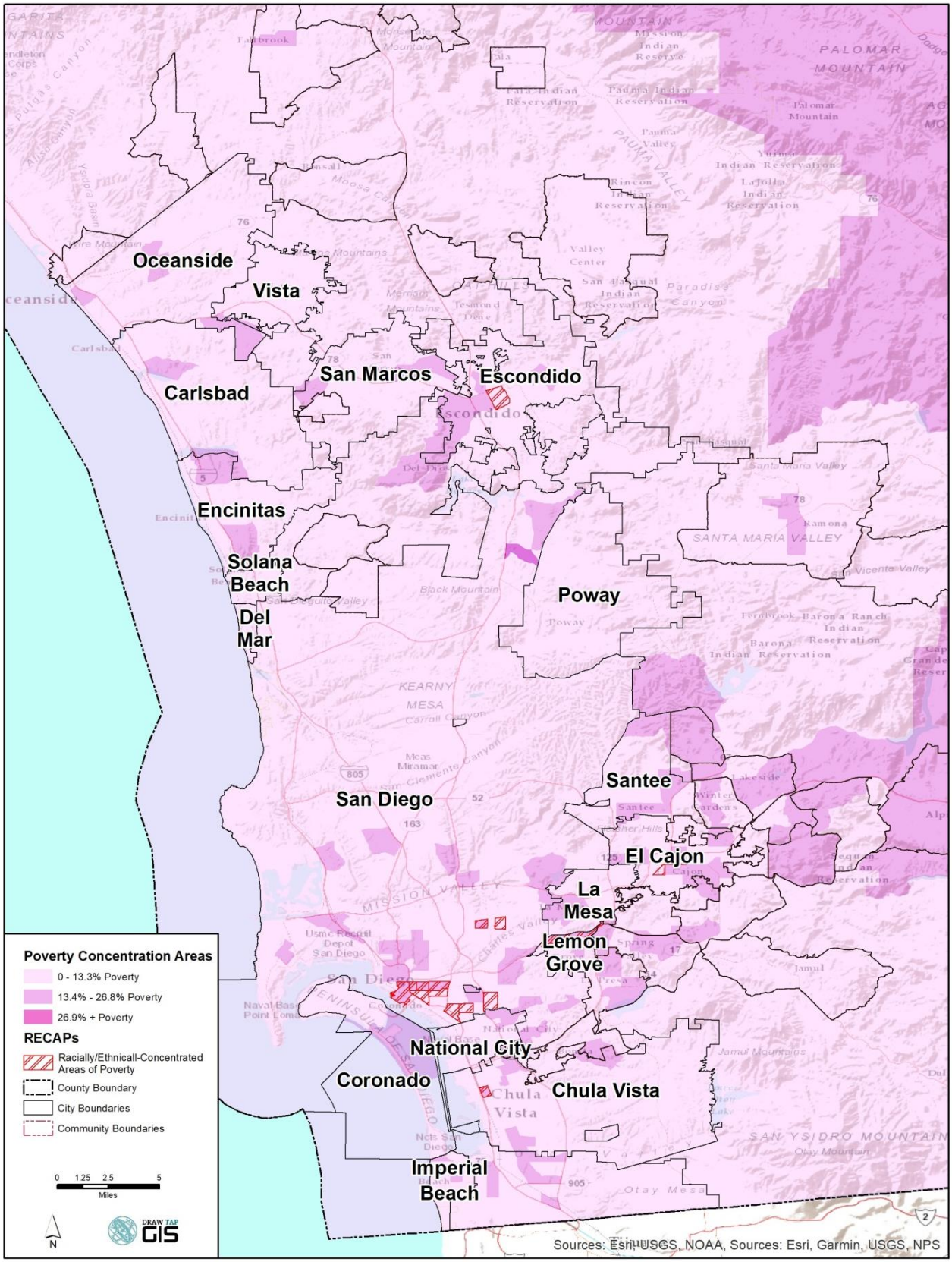
25 U.S. Census Bureau, "Areas with Concentrated Poverty: 2006–2010". American Community Survey Briefs, December 2 011.

26 The U.S. Census Bureau determines poverty status by comparing annual income to a set of dollar values called poverty thresholds that vary by family size, number of children, and age of householder. If a family's before tax money income is less than the dollar value of their threshold, then that family and every individual in it are considered to be in poverty. For people not living in families, poverty status is determined by comparing the individual's income to his or her poverty threshold.

Figure 8: Poverty Concentration Areas



F. Housing Profile

A discussion of fair housing choice must include an assessment of the housing market being analyzed. This section provides an overview of the characteristics of the local and regional housing markets. The Census Bureau defines a housing unit as a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied (or, if vacant, is intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building and which have direct access from outside the building or through a common hall.

1. Housing Growth

Housing data reveals that the San Diego County housing stock increased by almost five percent between 2010 and 2019 (Table 32), the most recent Census data available and the most current housing estimates available.

This growth rate is lower than the preceding decade where housing growth increased by almost 12 percent from 2000 to 2010. Among jurisdictions in the county, the City of San Marcos continued to experience the largest housing growth (12.2 percent) followed by Chula Vista (7.7 percent) and San Diego (5.9 percent). These housing growth rates are small compared to those between 2000 and 2010, where the highest rates ranged from 52 to 32 percent. In the last decade, most jurisdictions in the county experienced housing growth of less than five percent.

SANDAG growth forecasts estimate that by 2035, the county's housing stock will increase by 14.4 percent. The cities of National City, Chula Vista, and San Diego are expected to see housing stock growth that in excess of 15 percent (20.9 percent, 18.3 percent, and 17.4 percent, respectively). The estimated population growth for the county is expected to exceed production marginally (growth from 3.4 to 3.9 million, 15 percent) Inability to produce enough housing units to accommodate growth in the number of households will reduce vacancy rates, could drive up market prices, increase the incidence of overcrowding.

Table 32: Housing Unit Growth

Jurisdiction	# of Units 2010	# of Units 2019	% Change 2010 to 2019	Projected 2035	% Change 2019-2035
Urban County					
Coronado	9,634	9,740	1.1%	9,697	-0.4%
Del Mar	2,596	2,625	1.1%	2,653	1.1%
Imperial Beach	9,882	10,074	1.9%	10,926	8.5%
Lemon Grove	8,868	9,114	2.8%	9,654	5.9%
Poway	16,715	16,917	1.2%	17,685	4.5%
Solana Beach	6,540	6,569	0.4%	6,833	4.0%
Unincorporated	173,756	178,844	2.9%	209,506	17.1%
Total Urban County	227,991	233,883	2.6%	266,954	14.1%
Entitlement Cities					
Carlsbad	44,673	47,080	5.4%	50,261	6.8%
Chula Vista	79,416	85,535	7.7%	101,188	18.3%
El Cajon	35,850	36,148	0.8%	38,163	5.6%
Encinitas	25,740	26,495	2.9%	26,765	1.0%
Escondido	48,044	48,833	1.6%	55,633	13.9%
La Mesa	26,167	26,869	2.7%	30,001	11.7%
National City	16,762	17,264	3.0%	20,877	20.9%
Oceanside	64,435	65,902	2.3%	70,395	6.8%
San Diego	515,275	545,645	5.9%	640,668	17.4%
San Marcos	28,641	32,126	12.2%	35,795	11.4%
Santee	20,048	21,100	5.2%	22,776	7.9%
Vista	30,986	32,580	5.1%	35,307	8.4%
Total County	**1,164,028**	**1,219,460**	**4.8%**	**1,394,783**	**14.4%**

Sources: Bureau of the Census, 2010 Census; SANDAG Series 13 Regional Growth Forecast; California Department of Finance Housing Estimates (E5), 2019.

2. Housing Type

A region's housing stock generally includes three categories: single-family dwelling units, multi-family dwelling units, and other types of units such as mobile homes. Single-family units are attached or detached dwelling units usually on individual lots of land. As shown in Table 33, approximately 60 percent of the housing units in the county are single-family dwellings. The cities of Del Mar, Lemon Grove, Poway, Carlsbad and Encinitas, as well as the unincorporated county areas, have a much larger proportion of this housing unit type (over 70 percent), while El Cajon and Imperial Beach have a much lower proportion (less than 50 percent).

Table 33: Housing Stock Mix 2019

Jurisdiction	Single Family Units			Multi-Family Units			Mobile Homes
	Detached	Attached	Total	2-4 Units	5+ Units	Total	
Urban County							
Coronado	45.7%	10.7%	56.4%	6.8%	36.8%	43.5%	0.0%
Del Mar	51.6%	19.7%	71.3%	7.7%	21.1%	28.7%	0.0%
Imperial Beach	39.1%	7.6%	46.7%	12.3%	37.9%	50.1%	3.2%
Lemon Grove	65.9%	8.7%	74.6%	7.3%	17.2%	24.5%	0.9%
Poway	75.1%	4.1%	79.1%	2.4%	13.6%	16.0%	4.9%
Solana Beach	47.8%	19.4%	67.2%	6.2%	26.4%	32.6%	0.2%
Unincorporated	68.6%	5.9%	74.5%	4.6%	12.4%	17.1%	8.4%
Total Urban County	66.0%	6.7%	72.6%	5.1%	15.3%	20.4%	7.0%
Entitlement Jurisdictions							
Carlsbad	53.1%	16.9%	70.0%	5.5%	21.8%	27.2%	2.7%
Chula Vista	53.5%	9.8%	63.4%	5.9%	26.0%	31.9%	4.8%
El Cajon	41.1%	4.9%	46.0%	7.8%	40.8%	48.7%	5.3%
Encinitas	58.1%	18.7%	76.8%	6.8%	13.8%	20.6%	2.6%
Escondido	50.8%	6.1%	56.9%	6.8%	28.5%	35.3%	7.7%
La Mesa	46.9%	6.0%	52.9%	9.0%	37.4%	46.5%	0.7%
National City	43.3%	9.4%	52.7%	9.2%	35.6%	44.8%	2.5%
Oceanside	52.5%	11.5%	64.0%	8.8%	22.2%	31.0%	5.0%
San Diego	44.3%	8.6%	52.9%	8.3%	37.6%	45.8%	1.2%
San Marcos	51.1%	6.9%	58.0%	3.9%	27.8%	31.6%	10.4%
Santee	55.6%	9.1%	64.8%	5.9%	18.2%	24.1%	11.1%
Vista	49.3%	7.4%	56.8%	7.2%	30.3%	37.4%	5.8%
Total County	**50.9%**	**8.7%**	**59.6%**	**7.2%**	**29.4%**	**36.6%**	**3.8%**

Source: California Department of Finance, Population and Housing Estimates (E5), 2019.

3. Tenure and Vacancy

Housing tenure describes the arrangement by which a household occupies a housing unit; that is, whether a housing unit is owner-occupied or renter-occupied. Tenure preferences are primarily related to household income, composition, and age of the resident. Communities need to have an adequate supply of units available both for rent and for sale in order to accommodate a range of households with varying incomes, family sizes, composition, lifestyles, etc. A person and households may face different housing issues in the rental housing market versus the for-sale housing market. Residential stability is also influenced by tenure with ownership housing resulting in a much lower turnover rate than rental housing.

As seen in Table 34, San Diego County has a higher proportion of owner-occupied housing (53 percent) than renter-occupied housing (47 percent). The ownership level fell by 1.4 percent between 2010 and 2017, but was still below the national level of 63.8 percent and slightly lower than the 54.5 percent State figure for housing ownership. However, ownership rates decreased at all levels between 2010 and 2017. Half of the jurisdictions in the county had more owner-occupied housing units than renter-occupied units.

Exceptions include Coronado, Imperial Beach, El Cajon, Escondido, La Mesa, National City, San Diego, and Vista. The tenure distribution in Coronado, Imperial Beach, and National City may be attributed to the large proportion of military families in those cities living off base due to the lack of, or demand for, housing and the close proximity of the cities to military bases. The large proportion of renters in El Cajon is partially explained by the large amount of multi-family housing in the City.

Table 34: Housing Tenure and Vacancy

Jurisdiction	Percent Owner-Occupied	Percent Renter-Occupied	Vacancy Rate
Urban County			
Coronado	49.2%	50.8%	26.8%
Del Mar	53.4%	46.6%	31.6%
Imperial Beach	31.8%	68.2%	14.3%
Lemon Grove	54.1%	45.9%	5.4%
Poway	74.4%	25.6%	4.1%
Solana Beach	58.6%	41.4%	16.0%
Unincorporated	67.6%	32.4%	9.1%
Total Urban County	64.9%	35.1%	9.9%
Entitlement Jurisdictions			
Carlsbad	65.0%	35.0%	8.9%
Chula Vista	58.0%	42.0%	8.9%
El Cajon	38.2%	61.8%	3.1%
Encinitas	63.8%	36.2%	8.4%
Escondido	49.8%	50.2%	4.5%
La Mesa	41.6%	58.4%	6.4%
National City	32.1%	67.9%	7.1%
Oceanside	56.0%	44.0%	7.6%
San Diego	46.8%	53.2%	7.4%
San Marcos	61.3%	38.7%	4.5%
Santee	69.0%	31.0%	4.3%
Vista	49.2%	50.8%	3.6%
Total County	**65.0%**	**35.0%**	**8.9%**

Sources: American Community Survey, 2013-2017.

4. Tenure by Income and Race/Ethnicity

A substantial income and housing disparity exists between owner- and renter-households. Table 35 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.

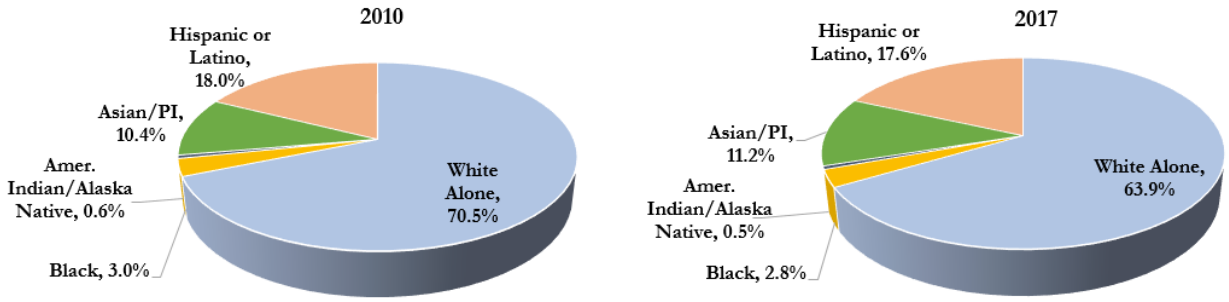
The county's tenure distribution also has a racial and ethnic component as many ethnic minority populations in San Diego County have not achieved housing homeownership as readily as the White population. In fact as of 2017, the majority of owner-occupied households were White (Figure 9). Of those who 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.

Table 35: 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 9: Race of Homeowner



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

G. Housing Condition

Assessing housing conditions in San Diego County can provide the basis for developing policies and programs to maintain and preserve the quality of the housing stock. Housing age can indicate general housing conditions within a community. Housing is subject to gradual deterioration over time. Deteriorating housing can depress neighboring property values, discourage reinvestment, and impact the quality of life in a neighborhood. State and federal housing programs typically consider the age of a community's housing stock when estimating rehabilitation needs. In general, most homes begin to require major repairs or have significant rehabilitation needs at 30 or 40 years of age. Furthermore, housing units constructed prior to 1979 are more likely to contain lead-based paint.

The housing stock in the San Diego region is older, with a majority of the housing units (54 percent) built before 1979 and is at least 40 years old (Table 36). The highest percentages of pre-1980 housing units are generally found in the older, urbanized neighborhoods of the cities of La Mesa, Lemon Grove, El Cajon, San Diego, Coronado and National City and will most likely have the largest proportions of housing units potentially in need of rehabilitation. Home rehabilitation can be an obstacle for senior homeowners with fixed incomes and mobility issues.

1. Lead-Based Paint Hazard

Housing age is a key variable used to estimate the number of housing units with lead-based paint (LBP). Lead based-paint was banned in the United States in 1978. Residences constructed before 1978 may have lead-based paint hazards. According to the federal Centers for Disease Control (CDC), approximately 250,000 children aged one to five years in the United States have elevated levels of lead in their blood. High blood lead levels are a concern because they may be harmful to a child's developing organ systems such as the kidneys, brain, liver, and blood-forming tissues, potentially affecting a child's ability to learn. Very high blood lead levels can cause devastating health consequences, including seizures, coma, and even death. Children are much more vulnerable to lead poisoning than adults because children tend to put items into their mouths and some of these items may contain lead paint. In addition, their bodies absorb up to 40 percent of the lead with which they come into contact, as opposed to only ten percent absorbed by adults. Lead can enter the body through breathing or ingestion. Several factors contribute to higher incidence of lead poisoning:

- All children under the age of six years old are at higher risk.
- Children living at or below the poverty line are at a higher risk.
- Children in older housing are at higher risk.
- Children of some racial and ethnic groups and those living in older housing are at disproportionately higher risk.

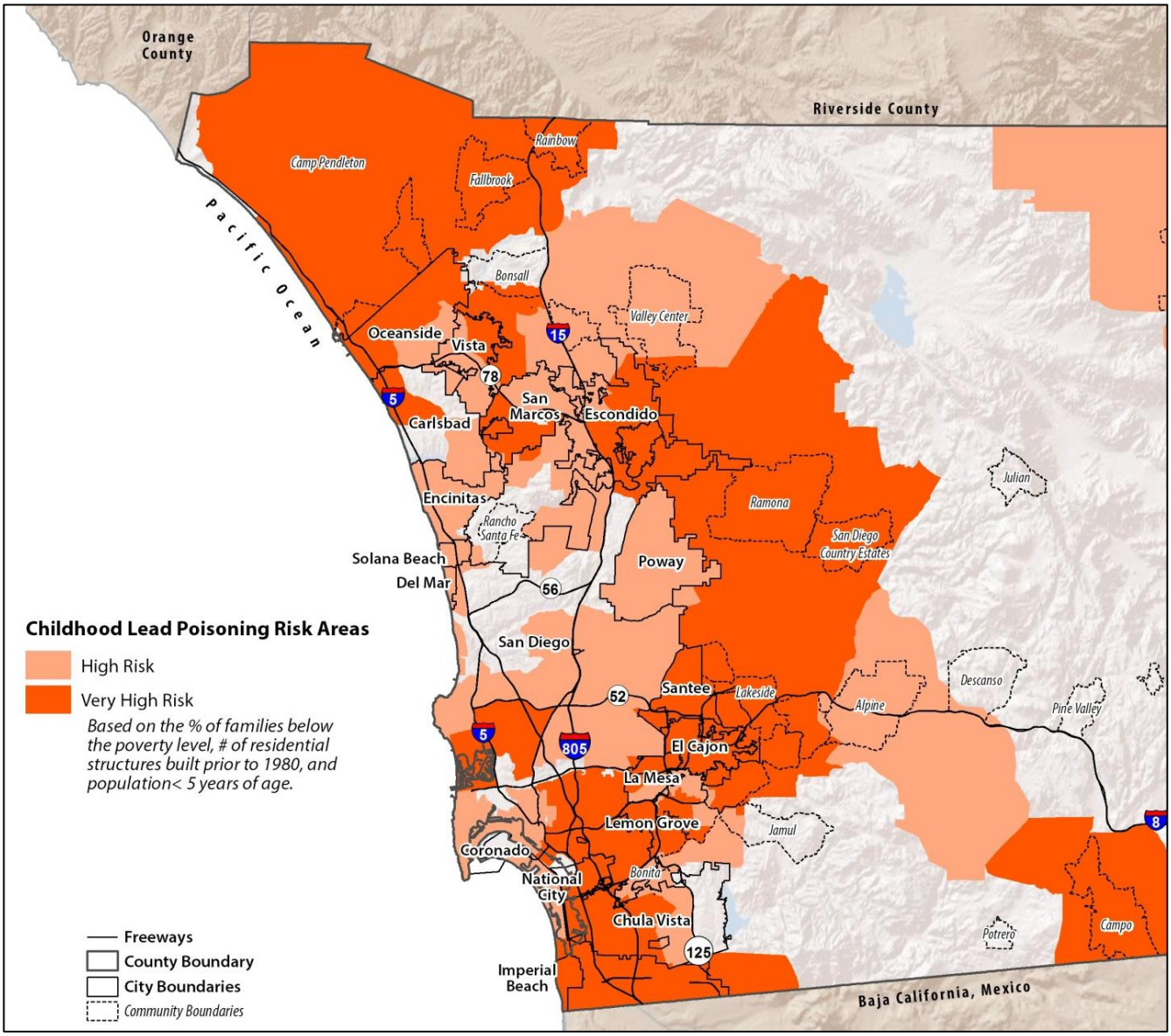
According to the County Health and Human Services Agency, between 2013 and 2017, 273 cases of lead-poisoning (Blood Lead Level > 9.5 mcg/dL or greater) among children under 21 years of age were recorded. This figure is an increase from the reported 104 cases between 2009 and 2013. However, the increase may be due to changes in the reporting threshold from 14.4mcg/dL to 9.5mcg/dL.

Table 36: Housing Age and Lead-Poisoning Cases

Jurisdiction	Built 1960-1979	Built 1940-1959	Built Before 1940	Median Year Built	Lead Poisoning Cases 2009-2013
Urban County					
Coronado	38.0%	19.3%	15.1%	1972	-
Del Mar	53.3%	18.7%	3.1%	1971	-
Imperial Beach	40.9%	30.0%	2.5%	1970	-
Lemon Grove	34.7%	40.8%	4.9%	1963	-
Poway	48.0%	7.0%	0.9%	1978	-
Solana Beach	54.6%	12.4%	2.5%	1976	-
Unincorporated	34.7%	10.4%	2.6%	-	5
Total Urban County	36.9%	12.7%	3.2%	-	5
Entitlement Jurisdictions					
Carlsbad	26.3%	4.6%	1.1%	1987	2
Chula Vista	28.5%	16.4%	1.4%	1983	6
El Cajon	45.3%	23.4%	1.1%	1973	8
Encinitas	42.0%	10.4%	3.3%	1978	2
Escondido	38.3%	7.4%	2.3%	1981	6
La Mesa	41.1%	30.6%	5.0%	1969	1
National City	36.8%	25.3%	8.0%	1970	3
Oceanside	33.2%	7.5%	1.4%	1983	9
San Diego	34.2%	16.7%	6.9%	1976	4
San Marcos	26.8%	2.8%	0.7%	1990	6
Santee	52.0%	8.4%	0.8%	1977	-
Vista	33.5%	8.2%	1.6%	1982	7
Total County	**34.9%**	**14.3%**	**4.4%**	**1978**	**1**

Note: Lead poisoning cases refer to children under 21 years of age with a venous BLL 14.5 ug/dL or greater.
Sources: American Community Survey (ACS), 2009-2013; County of San Diego Childhood Lead Poisoning Prevention Program (CLPPP) Epidemiology & Immunization Services, Public Health Services, 2014.

Figure 10: Childhood Lead Poisoning Risk Areas



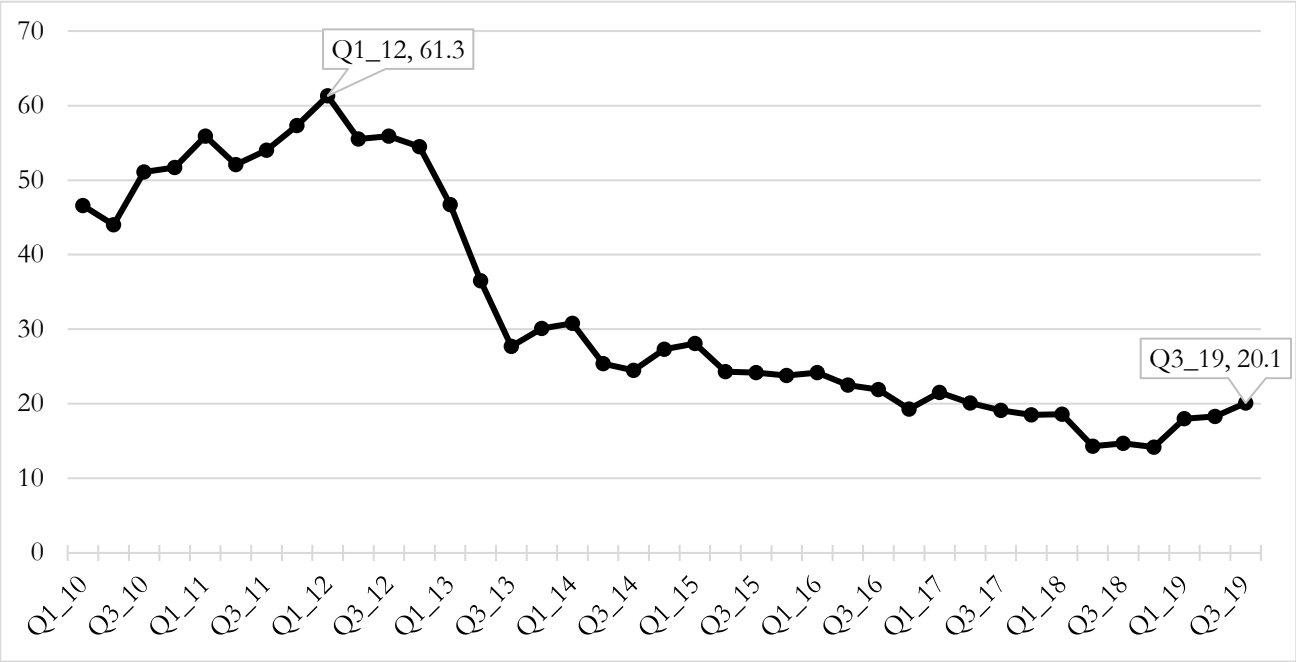
H. Housing Cost and Affordability

This section evaluates the affordability of the housing stock in San Diego County to low and moderate income households. If housing costs are relatively high in comparison to household income, a correspondingly high rate of housing problems occurs. It is important to emphasize that housing affordability alone is not a fair housing issue. However, fair housing concerns may arise when housing affordability interacts with other factors covered under the fair housing laws, such as household type, composition, and race/ethnicity.

1. Housing Cost

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 11 shows that affordability for the region peaked in 2012 during the recession and has dropped considerably since then.

Figure 11: 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).

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. The California Housing Partnership (CHPC) estimates that the county's lowest-income renters spend 69 percent of their income on rent.[27] The CHPC estimated that in 2018, renters needed to earn $38.31/hr (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.

Table 37 displays median home sale prices for each jurisdiction in San Diego County. For 2019, the median sales price for homes in San Diego County was $594,909, an increase of 38 percent from 2014. Home prices vary by area/jurisdiction, with very high median prices in coastal areas such as the cities of Coronado, Del Mar, and Solana Beach. Imperial Beach and Lemon Grove had the lowest median sales price in the region.

Table 37: Median Home Sale Prices by Jurisdiction

County/City/Area	# Sold Nov. 2014	# Sold Nov. 2019	Median Price Nov. 2014	Median Price Nov. 2019	% Change 2014-2019
Urban County					
Coronado	13	42	$1,059,500	$1,820,000	71.8%
Del Mar	23	13	$1,249,000	$1,675,000	34.1%
Imperial Beach	8	17	$427,000	$530,000	24.1%
Lemon Grove	24	19	$331,750	$490,000	47.7%
Poway	35	46	$558,409	$677,000	21.2%
Solana Beach	24	14	$1,022,500	$1,200,000	17.4%
Entitlement Jurisdictions					
Carlsbad	121	13	$687,500	$859,000	24.9%
Chula Vista	214	282	$405,000	$535,000	32.1%
El Cajon	116	165	$365,000	$523,000	43.3%
Encinitas[1]	60	57	$768,000	$992,000	29.2%
Escondido	117	182	$394,000	$580,000	47.2%
La Mesa	69	76	$417,000	$549,000	31.7%
National City	16	14	$277,500	$446,000	60.7%
Oceanside	164	196	$392,500	$549,000	39.9%
San Diego	1023	1,180	$439,500	$625,000	42.2%
Santee	81	110	$350,000	$622,500	51.7%
Vista	53	78	$420,000	$531,000	34.5%
San Diego County	**83**	**102**	**$430,000**	**$565,000**	**38.4%**

Note: 1. Does not include Cardiff-by-the-Sea sales data.
Sources: DQNews.com, California Home Sale Activity by City, November 2014; CoreLogic, California Home Sale Activity by City, November 2019. Accessed January 30,2020.

[27] California Housing Partnership Corporation. "San Diego County Report: San Diego County's Housing Emergency and Proposed Solutions." (May 2018).

The San Diego County Apartment Association (SDCAA) publishes average rental rates biannually. Table 38 displays the average rent by jurisdiction on Fall 2014 and Fall 2018, providing a reasonable five-year timeframe to capture the change in rental rates. The estimated average rental costs in San Diego County increased by an average of 33 percent. 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.

Table 38: Average Rental Rates by Jurisdiction - Fall 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

Table 38: Average Rental Rates by Jurisdiction - Fall 2018

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

Table 38: Average Rental Rates by Jurisdiction - Fall 2018

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.

2. Housing Affordability

Housing affordability can be inferred by comparing the cost of renting or owning a home in a community with the maximum affordable housing costs for households at different income levels. Taken together, this information can generally show who can afford what size and type of housing and indicate the type of households most likely to experience overcrowding and overpayment. While housing affordability alone is not a fair housing issue, fair housing concerns may arise when housing affordability interacts with factors covered under the fair housing laws, such as household type, composition, and race/ethnicity.

HUD conducts annual household income surveys nationwide to determine a household's eligibility for federal housing assistance. Households in the lower end of each income category can afford less by comparison than those at the upper end. Table 39 shows the annual household income by household size and the maximum affordable housing payment based on the standard of 30 to 35 percent of household income. Also shown are general cost assumptions for utilities, taxes, and property insurance.

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.

Based on the rental data presented in Table 38, none of jurisdictions had a rents within the range of affordability for lower-income families. Table 39 shows that extremely low-income households cannot afford rents in any part of the county. Larger, low-income households can afford some of the studio and one-bedroom rental units but those would be inadequate to house a large family. Moderate-income households have a few more options for rentals but again, large households may encounter difficulty

finding adequately sized units. The situation is most difficult for seniors with fixed incomes. When the housing market is tight, with high demand, low vacancies, and rising costs, the potential for discriminatory housing practices also increases.

Table 39: Housing Affordability Matrix - San Diego County (2019)

Income Group	Annual Income Limits	Affordable Payment		Housing Costs		Maximum Affordable Price	
		Renter	Owner	Utilities	Taxes & Insurance (Owner)	Rental (per month)	Home (purchase price)
Extremely Low (0-30% AMI)							
1-Person	$22,500	$563	$563	$160	$197	$403	$47,856
2-Person	$25,700	$643	$643	$201	$225	$442	$50,416
3-Person	$28,900	$723	$723	$241	$253	$482	$53,209
4-Person	$32,100	$803	$803	$283	$281	$520	$55,536
5-Person	$34,700	$868	$868	$345	$304	$429	$50,940
Low (31-50% AMI)							
1-Person	$37,450	$936	$936	$160	$328	$776	$104,396
2-Person	$42,800	$1,070	$1,070	$201	$375	$869	$115,087
3-Person	$48,150	$1,204	$1,204	$241	$421	$963	$126,011
4-Person	$53,500	$1,338	$1,338	$283	$468	$1,055	$136,470
5-Person	$57,800	$1,445	$1,445	$345	$506	$1,006	$138,303
Moderate (51-80% AMI)							
1-Person	$59,950	$906	$1,057	$160	$370	$746	$122,689
2-Person	$68,500	$1,036	$1,208	$201	$423	$835	$135,994
3-Person	$77,050	$1,165	$1,359	$241	$476	$924	$149,531
4-Person	$85,600	$1,295	$1,510	$283	$529	$1,012	$162,603
5-Person	$92,450	$1,398	$1,631	$345	$571	$1,053	$166,451
Middle/Upper (80-120 %AMI)							
1-Person	$72,500	$1,661	$1,938	$160	$678	$1,501	$255,962
2-Person	$82,850	$1,899	$2,215	$201	$775	$1,698	$288,305
3-Person	$93,200	$2,136	$2,492	$241	$872	$1,895	$320,881
4-Person	$103,550	$2,373	$2,769	$283	$969	$2,090	$352,992
5-Person	$111,850	$2,563	$2,990	$345	$1,047	$2,218	$372,071

Assumptions: California Department of Housing and Community Development 2018 income limits; 30 - 35% gross household income as affordable housing costs (depending on tenure and income level); 35% of monthly affordable cost for taxes and insurance; 5% down-payment, 4% interest rate for a 30-year fixed rate mortgage loan; utilities based on the Housing Authority of the County of San Diego's Allowances for Tenant-Furnished Utilities and Other Services, July 2019. Assumed Natural Gas.

Methodology: Affordable housing costs in this table are calculated based on California Health and Safety Code definitions, which generally result in lower affordable housing costs.

Sources: California Department of Housing and Community Development, 2019; Housing Authority of the County of San Diego, 2019.

I. Housing Problems

1. Overcrowding

Some households may not be able to accommodate high cost burdens for housing but may instead accept smaller housing or reside with other individuals or families in the same home. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding. 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 are doubling up to afford housing. However, cultural differences also contribute to the overcrowded conditions since some cultures tend to have a larger household size than others due to the preference of living with extended family members. Not only is overcrowding a potential fair housing concern, it can potentially strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes.

How is Overcrowding Defined?

According to State and federal guidelines, overcrowding is defined as a unit with more than one person per room, including dining and living rooms but excluding bathrooms, kitchens, hallways, and porches. Severe overcrowding is defined as households with more than 1.5 persons per room.

Overcrowding Threshold ≠ Occupancy Standard

Overcrowding thresholds only describe how a unit is occupied but by no means represent the maximum occupancy standard of a unit. In general, there are no occupancy standards except for those established in the building codes. Occupancy standards are discussed later in Chapter 5: Public Policies.

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. 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. Fair housing issues may arise from policies aimed to limit overcrowding that have a disparate impact on specific racial or ethnic groups with 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.

As mentioned, approximately seven 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 had high proportions of minority residents and lower median incomes as a whole as well. Table 40 also shows that overcrowding is significantly more prevalent among renter-households than among owner-households.

Table 40: Overcrowding by Tenure

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%**

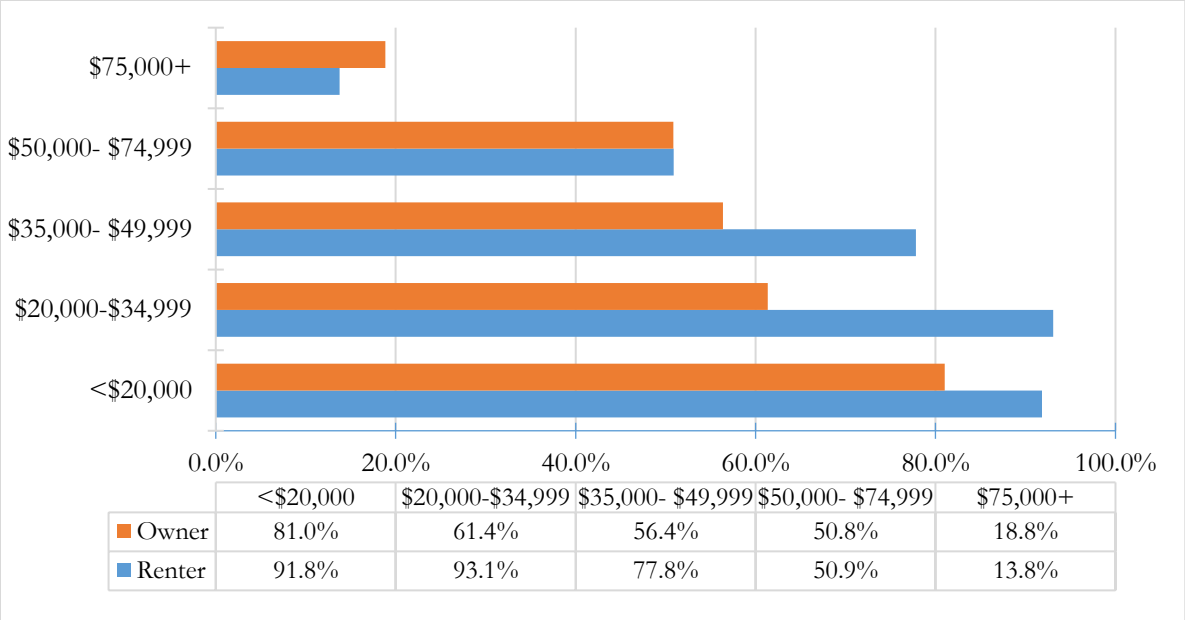
Source: American Community Survey (ACS), 2013-2017.

2. Housing Cost Burden

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 costs increase faster than income. Figure 12 shows how dramatically 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. Among the lower income groups, larger proportions of renter-households experienced housing cost burden.

Figure 12: Housing Cost Burden by Income and Tenure



	<$20,000	$20,000-$34,999	$35,000- $49,999	$50,000- $74,999	$75,000+
Owner	81.0%	61.4%	56.4%	50.8%	18.8%
Renter	91.8%	93.1%	77.8%	50.9%	13.8%

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

About 42 percent of county households experienced cost burden per the 2012-2016 CHAS (Table 41). 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.

Table 41: Housing Cost Burden by Tenure

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

J. Publicly Assisted Housing

The availability and location of public and affordable housing may be a fair housing concern. If such housing is concentrated in one area of a community or a region, a household seeking affordable housing is restricted to choices within a limited geographic area. Public/affordable housing and housing assistance must be accessible to qualified households regardless of race/ethnicity, disability, or other special characteristics.

1. Public Housing

Housing Authority of the County of San Diego (HACSD)

Two housing authorities in the San Diego region own and operate public housing units (Figure 13 on page 91) – the Housing Authority of the County of San Diego (HACSD) and the San Diego Housing Commission (SDHC). HACSD owns and administers public housing rental complexes (121 units), all of which are located in the City of Chula Vista. Eligible residents must be a senior (62 years of age or older), a disabled individual, or a low-income family and must live in one of the jurisdictions covered by HACSD. The household's annual gross income must be at or below 50 percent of the San Diego AMI. As of August 2019, 117 households were being assisted by HACSD. As shown in Table 43, Hispanic and White-headed households make up the majority of households assisted.

San Diego Housing Commission (SDHC)

As federal subsidies to operate and maintain public housing began decreasing, and City-owned units became operationally restrictive and inefficient, SDHC opted out of the Conventional Public Housing Program in 2007 (which provided for the upkeep of 1,366 units). Through a landmark agreement, the U.S. Department of Housing and Urban Development (HUD) transferred ownership and operating authority for these units to SDHC, which then leveraged the equity in these properties to create or preserve 810 additional affordable rental housing units. SDHC now owns the converted units and operates them as rent-restricted affordable rental housing units that are available at varying ranges of affordable rents to households earning no greater than 80 percent of AMI.[28] At the time of conversion from public housing to SDHC ownership, residents of the units were awarded Section 8 Housing Choice Vouchers, which enabled them to choose to remain in their current home or to move to another rental property that would accept Housing Choice Vouchers. Approximately half of the residents at that time moved to another unit and half remained in their existing unit. SDHC provides federal Housing Choice Voucher rental assistance to more than 15,000 low-income households. SDHC retained a small number of Public Housing units (currently 189 units). As of September 2019, 178 households were being assisted by SDHC in Public Housing units. As shown in Table 43 Hispanic-headed and White households make up the majority of households assisted in Public Housing.

[28] San Diego Housing Commission, "Re-positioning of the San Diego Housing Commission's Public Housing Portfolio." Housing Authority Report (November 9, 2006).

Table 42: Public Housing Units

Housing Authority	Name	Address	Units
HACSD	Towncentre Manor	434 F Street, Chula Vista, CA 91910	59 Units
HACSD	Melrose Manor	1678 Melrose Avenue, Chula Vista, CA 91911	24 Units
HACSD	L Street Manor	584 L Street, Chula Vista, CA 91911	16 Units
HACSD	Dorothy Street Manor	778 Dorothy Street, Chula Vista, CA 91911	22 Units
SDHC	Otay Villas	649 Picador Blvd., San Diego, CA 92154	78 Units
SDHC	University Canyon North	2090 Via Las Cumbres, San Diego, CA 92111	36 units
SDHC	Vista Verde	351 South 33rd Street, San Diego, CA 92113	40 units
SDHC	Camulos	32222 Camulos St., San Diego, CA 92110	12 units
SDHC	Mason	3919 Mason St, San Diego, CA 92110	8 units
SDHC	44th St	2420 44th St, San Diego, CA 92105	8 units
SDHC	Trojan	5385-5389 Trojan Ave., San Diego, CA 92115	3 units
SDHC	Valeta	4095 Valeta St, San Diego, CA 92110	4 units

Sources: San Diego Housing and Community Development, August 2019, San Diego Housing Commission, September 2019.

Table 43: Characteristics of Householders in Public Housing Units

Characteristics	HACSD	SDHC
	Number	Number
Senior/Disabled	76	66
Small Family	88	163
Large Family	27	15
Non-Hispanic	39	76
Hispanic	77	102
White	88	118
Black	14	50
American Indian	0	4
Asian/Pacific Islander	5	8
Total Households	**117**	**178**

Note: Values represent head of household characteristics. The count of White households includes Hispanic households. Data for non-Hispanic Whites is not available. Householders may belong to more than one category. For example, a householder may be both a large family householder and Hispanic.
Sources: Housing Authority of the County of San Diego, August 2019; San Diego Housing Commission, September 2019.

The number of persons on the waiting list for public housing far exceeds current capacity. HACSD indicates that as of August 2019, there were 20,136 households on the waiting list. Over 40 percent of waitlisted households were Hispanic and about one quarter were Black. Households with a disabled head of household make up almost 20 percent of the waiting list. There are 76,749 households on the SDHC public housing waiting list (September 2019). Over 25 percent of SDHC waitlisted households included a disabled head of household; 36.1 percent of households are Hispanic and 28.6 percent are Black. With the extremely limited capacity and the length of tenancy, it is unlikely that the characteristics of the public housing residents would change substantially in the near future.

Table 44: Characteristics of Public Housing Waiting list (Households)

Characteristics	HACSD		SDHC	
	Number	Percent	Number	Percent
Senior	2,225	11.0%	7,612	9.9%
Disabled	3,987	19.8%	19,743	25.7%
Family	10,454	51.9%	38,302	49.9%
Non-Hispanic	11,699	58.1%	44,595	58.1%
Hispanic	8,365	41.5%	27,678	36.1%
White	12,865	63.9%	39,121	51.0%
Black	4,710	23.4%	21,948	28.6%
American Indian	465	2.3%	1,599	2.1%
Asian/Pacific Islander	1,581	7.9%	4,871	6.3%
Total	**20,136**	**100.0%**	**76,749**	**100.0%**

Note: Values represent head of household characteristics. The count of White households includes Hispanic households. Data for non-Hispanic Whites is not available.
Sources: Housing Authority of the County of San Diego, August 2019; San Diego Housing Commission, September, 2019.

2. Housing Choice Vouchers Program

The Section 8 Housing Choice Voucher (HCV) program is a rent subsidy program that helps low-income families and seniors pay rents of private units. HCV tenants pay approximately 30 percent of their income for rent, and the local housing authority pays the difference up to the payment standard established by the housing authority. The program offers low-income households the opportunity to obtain affordable, privately owned rental housing and to increase their housing choices. The owner's asking price must be supported by comparable rents in the area. The program participant pays any amount in the excess of the payment standard.

Six Housing Authorities administer the HCV program for San Diego County residents:

- **Housing Authority of the City of Carlsbad** administered 475 HCVs as of February 2020. There are 401 households on the waiting list. The waitlist is closed as of April 2020.
- **Housing Authority of the City of Encinitas** administered 97 vouchers as of February 2020. There are 956 households on the waiting list. The waitlist is open as of April 2020.
- **Housing Authority of the City of National City** administered 1,123 vouchers as of September 2019. There are 3,458 households on the waiting list. The waitlist is open as of April 2020.
- **Housing Authority of the City of Oceanside** 1,539 vouchers as of February 2020. There are 5,532 households on the waiting list. The waitlist is open as of April 2020.
- **San Diego Housing Commission (SDHC, City of San Diego)** administered 15,591 vouchers as of September 2019. There are 98,376 households on the waiting list. The waitlist is open as of April 2020.
- **Housing Authority of the County of San Diego (HACSD)** administered 9,945 vouchers as of August 2019. There are 36,337 households on the waiting list. The waitlist is indefinitely open as of April 2020.

As of February 2020, 29,057 San Diego County households were receiving HCV Assistance, with 89 percent of all vouchers administered by HACSD or SDHC. Table 45 summarizes the race and ethnicity of households assisted by the HCV program. A third of the county's HCV recipients (34 percent) were Hispanic and 22 percent were Black. Senior and/or disabled households represent a significant portion of those assisted by the HCV program, making up 65 percent of all households receiving HCVs.

Due to the geographic disparity in terms of rents, concentrations of voucher use have occurred (Table 46). For example, the City of El Cajon represents about three percent of the county's population but more than eight percent of the HCV use. Furthermore, 27 percent (2,656 participants) of the 9,945 vouchers administered by HACSD are concentrated in the City of El Cajon.

Table 45: Housing Choice Voucher Recipients

Housing Authority	Total	Black	Hispanic	White	Other	Senior	Disabled
City of Carlsbad	475	9.1%	21.7%	65.1%	4.2%	50.9%	54.5%
City of Encinitas	97	3.1%	21.6%	73.2%	2.1%	46.4%	27.8%
City of National City	1,123	5.7%	68.0%	82.0%	0.7%	12.2%	35.9%
City of Oceanside	1,539	16.0%	34.0%	76.0%	7.0%	11.6%	48.0%
San Diego Housing Commission (SDHC)	15,878	28.6%	32.0%	55.3%	16.1%	14.5%	47.3%
County of San Diego (HACSD)	9,945	16.6%	34.9%	78.8%	4.6%	39.9%	53.8%
Total	**29,057**	**22.5%**	**34.3%**	**48.2%**	**10.8%**	**15.7%**	**49.2%**

*Note: The count of White households includes Hispanic households. Data for non-Hispanic Whites is not available.
Source: Area Housing Authorities 2019/2020.

Table 46: Distribution of Housing Choice Voucher Recipients

Jurisdiction	Vouchers	% of All HCV	% County Population
Urban County			
Coronado	18	0.1%	0.7%
Del Mar	1	0.0%	0.1%
Imperial Beach	404	1.3%	0.8%
Lemon Grove	360	1.1%	0.8%
Poway	109	0.3%	1.5%
Solana Beach	17	0.1%	0.4%
Unincorporated	1,545	4.9%	15.4%
Total Urban County	2,454	7.8%	19.8%
Entitlement Jurisdictions			
Carlsbad	475	1.5%	3.4%
Chula Vista	2,436	7.7%	8.1%
El Cajon	2,656	8.4%	3.1%
Encinitas	97	0.3%	1.9%
Escondido	933	3.0%	4.6%
La Mesa	559	1.8%	1.8%
National City	1,123	3.6%	1.9%
Oceanside	1,539	4.9%	5.3%
San Diego	15,878	50.4%	42.4%
San Marcos	230	0.7%	2.9%
Santee	266	0.8%	1.7%
Vista	411	1.3%	3.0%
Total County	**31,511**	100.0%	100.0%

Note: Assisted households exceed allocations to a jurisdiction due to voucher use outside of originating jurisdiction. SDHC's Moving to Work flexibility and funding enable SDHC to issue a higher number of vouchers than its baseline allocation to assist more families. Total number of voucher use deviates slightly from Table 45 due to different timing of data processing. Also, total number of voucher use deviates slightly
Sources: Area Housing Authorities 2019/2020.

In 2019, only 14 percent of metropolitan families with children nationwide that received rent subsidies through HUD lived in low-poverty neighborhoods and only five percent lived in high-opportunity neighborhoods.[29] To help with the de-concentration of HCV use and allow households to locate adequate housing at a location of their choice, SDHC's Moving Forward (also known as Moving to Work, or MTW) program works to provide families with tools to assist them to move from high-poverty neighborhoods to low-poverty neighborhoods. The Choice Communities Initiative (a subset of the Moving Forward program) provides families receiving federal rental assistance administered by SDHC the opportunity to live in neighborhoods in the City of San Diego that offer a broader selection of schools and employment opportunities. SDHC created the Choice Communities Initiative in 2010 and expanded it in 2018. To increase housing opportunities through this initiative and to assist as many low-income families as possible, SDHC updated the payment standards that are used to determine the amount of rental assistance

[29] Mazzara, A. & Knudsen, B. (January 2019). Where families with children use housing vouchers: A comparative look at the 50 largest metropolitan areas. *Center on Budget and Policy Priorities*, Poverty and Race Research Action Council.

each family receives. SDHC divided City of San Diego ZIP Codes into three groups, each with its own payment standards: Choice Communities, Enterprise Communities, and Signature Communities. Higher payment standards are set in Choice or Enterprise Communities, where rental costs would typically be higher.Families moving to Choice or Enterprise Communities are eligible for no-interest security deposit loans and assistance from SDHC's Mobility Counseling Program.

Another important issue with the HCV program is the decreasing number of landlords willing to accept vouchers. In a tight housing market, landlords are typically able to capture high rents for the units and less likely to participate in government programs that place restrictions on rents, policies, and quality standards. Primarily in economically depressed neighborhoods, where the housing and neighborhood conditions are less than ideal, voucher recipients are most likely to find rental units that accept voucher payments. With owners opting out in more integrated neighborhoods, tenants will be increasingly confined to low-income areas, defeating the original purpose of the program. Another issue that related to the HCV program is the amount of time it takes voucher recipients to find a unit. On average, it takes about two months for voucher recipients to find a unit after the issuance of their voucher. According to the San Diego Area Housing Commissions, approximately 70 to 80 percent of householders successfully find a unit with their voucher. Table 47 summarizes the Housing Choice Voucher use metrics for the San Diego Area Housing Authorities.

Since the demand for housing assistance often exceeds the limited resources available, long waiting periods are common. The amount of time spent on the waiting list often varies, but the wait for rental assistance after a family is placed on the waiting list may be 10 or more years. These wait times can disproportionately impact seniors. As of February 2020, there were over 145,000 on the HCV waiting list (Table 48).

In 2019, the State passed SB 329 that prohibits source of income discrimination. Landlords cannot deny an applicant for rental housing based on the use of public assistance for rents. Presumably, the voucher use would increase, the time to locate a property accepting HCV would decrease, and a HCV recipient's locational choices would be expanded.

Table 47: Housing Choice Voucher Use Metrics

Housing Authority	# of Participating Landlords	Time to Find Unit after Voucher Issuance (Days)	% Households that Successfully Find Unit	# of Port-Out Households
Housing Authority of the City of Carlsbad	See Note 5	See Note 5	See Note 5	See Note 5
Housing Authority of the City of Encinitas	39[1]	68	70%	1
Housing Authority of the City of National City	480	44	See Note 2	8
Housing Authority of the City of Oceanside	540	60	76%	12
San Diego Housing Commission (SDHC, City of San Diego)	5,735	51	See Note 3	101 See Note 4
Housing Authority of the County of San Diego (HACSD)	3,427	60	80%	176

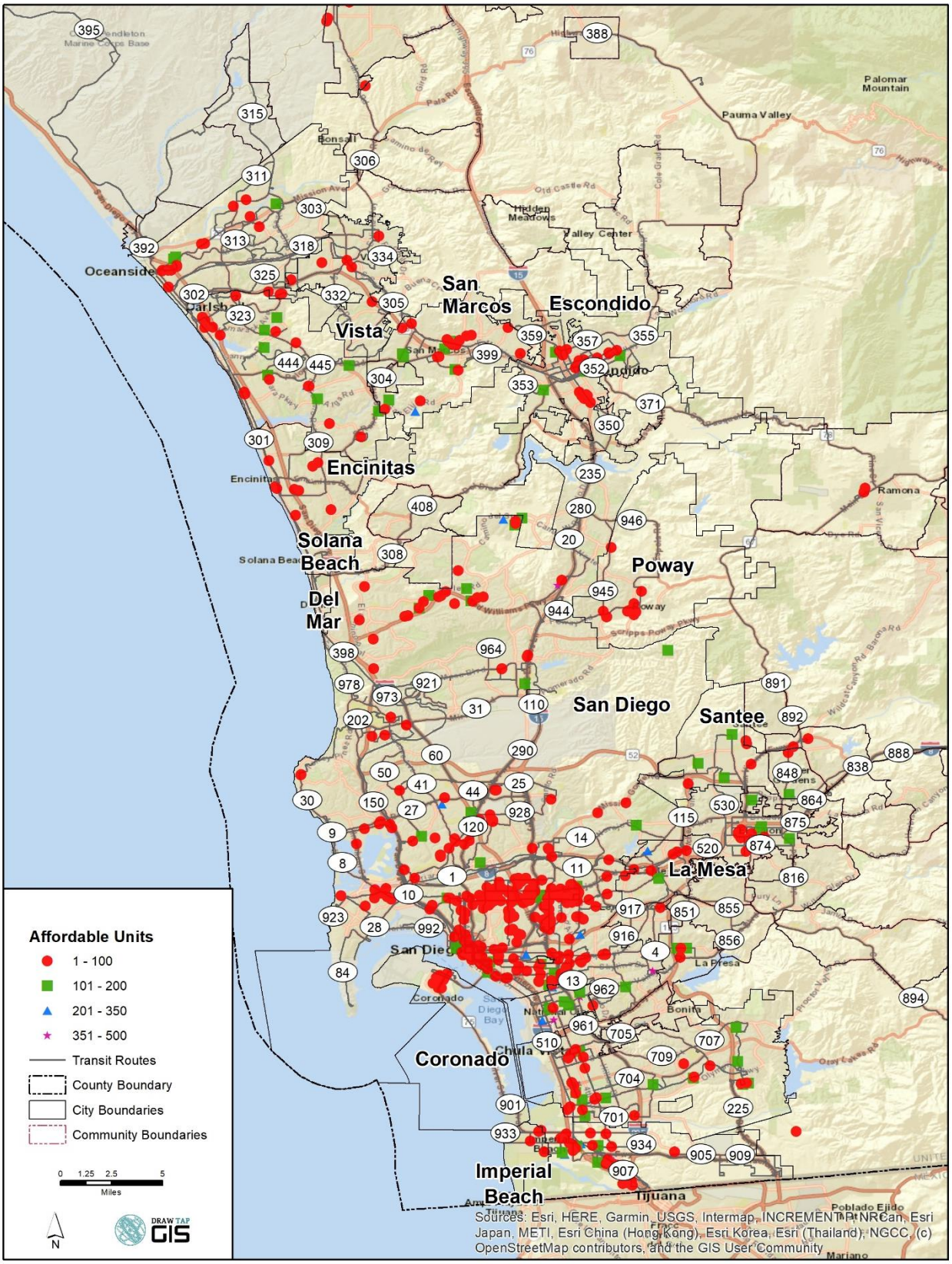
Note 1: These landlords only own one rental unit and it is rented to the HCV participant
Note 2: The Housing Authority of the City of National City reported that 13 households had lost their HCV in the last 6 months (November 2019-April 2020).
Note 3: The SDHC reported that approximately 4% of new admission vouchers issued result in the family not utilizing the rental assistance and either surrendering the voucher, letting it expire, or no longer keeping contact with the Housing Commission.
Note 4: Year-to-date Fiscal Year 2020 data.
Note 5: Data could not be provided by the Housing Authority of Carlsbad prior to the public review period. The data will be added to the final draft of the AI.
Sources: San Diego Area Housing Authorities, April/May 2020.

Table 48: Housing Choice Voucher Waitlist

Housing Authority	Total	Black	Hispanic	White	Other	Senior	Disabled
City of Carlsbad	401	2.9%	4.3%	24.0%	10.8%	16.1%	15.3%
City of Encinitas	956	12.0%	14.1%	67.5%	6.4%	32.6%	41.7%
City of National City	3,458	10.1%	66.3%	73.0%	32.0%	27.1%	24.0%
City of Oceanside	5,532	14.3%	34.1%	71.8%	13.9%	13.2%	19.2%
San Diego Housing Commission (SDHC)	98,376	27.9%	35.0%	50.4%	21.7%	10.0%	23.9%
Count of San Diego (HACSD)	36,337	20.0%	34.4%	66.8%	13.2%	13.3%	18.6%
Total	**145,060**	**24.3%**	**34.1%**	**53.3%**	**18.9%**	**11.1%**	**21.8%**

Sources: San Diego Area Housing Authorities 2019/2020.

Figure 13: Public Transit and Affordable Housing



3. Other Affordable Housing Projects

A number of developments countywide have set aside some or all of the units as affordable for low to moderate-income households. Together these projects provide approximately 39,398 units of affordable housing. The location of these units is shown on Figure 13.

As in typical urban environments throughout the country, lower- and moderate-income households tend to live in higher density neighborhoods. However, as housing becomes increasingly costly to develop due to limited land available, redevelopment of existing neighborhoods such as Little Italy, East Village and other higher density areas have raised the debate about gentrification.

In general, the location of public/assisted housing is partly the result of economic feasibility. Concentrations of affordable housing are located in central San Diego, Chula Vista, National City, and Escondido. Close to 68 percent of all affordable units are located in these cities, much of that is in the City of San Diego (55 percent). Figure 13 also shows that in the western/coastal areas, the distribution of these units follows a somewhat similar pattern exhibited by the distribution of both low- and moderate-income population and minority population. However, this is not true for the desert communities where there is a lack of affordable housing resources but very few affordable housing units.

The lack of affordable housing resources, compared to the magnitude of need, may become acute as the population in the region increases, especially given that the housing market is not keeping pace with the increasing population. According to the California Housing Partnership Corporation, San Diego County needs 143,800 more affordable rental homes to meet current demand.[30] Furthermore, funding sources (such as Tax Credits and Affordable Housing and Sustainable Communities) for affordable housing developments may inadvertently contribute to the concentration of affordable housing in transit-oriented neighborhoods with high-density developments.

K. Licensed Community Care Facilities

Persons with special needs, such as seniors and those with disabilities, must also have access to housing in a community. Community care facilities provide a supportive housing environment to persons with special needs in a group situation. Restrictions that prevent this type of housing represent a fair housing concern. While affordability is not a fair housing issue per se, stakeholders indicated that these facilities are often only available to wealthy persons.

According to the California Department of Social Services, Community Care Licensing Division, there were approximately 593 State-licensed residential care facilities for the elderly, 401 adult residential facilities, and 60 adult day care facilities throughout the county as of August 2019. These licensed care facilities had a combined capacity of just over 28,000 beds. The location of the various licensed care facilities in San Diego County in 2019 is shown on Figure 14. Most of the community care facilities within the county were located within the larger incorporated cities. There was a noticeable presence of facilities in the unincorporated areas, specifically those surrounding the incorporated cities. However, since most of the county's population is located within the incorporated cities, residents living in unincorporated areas would have to travel a great distance to access the region's inventory of care facilities.

[30] California Housing Partnership Corporation. "San Diego County's Housing Emergency and Proposed Solutions" (May 2018)

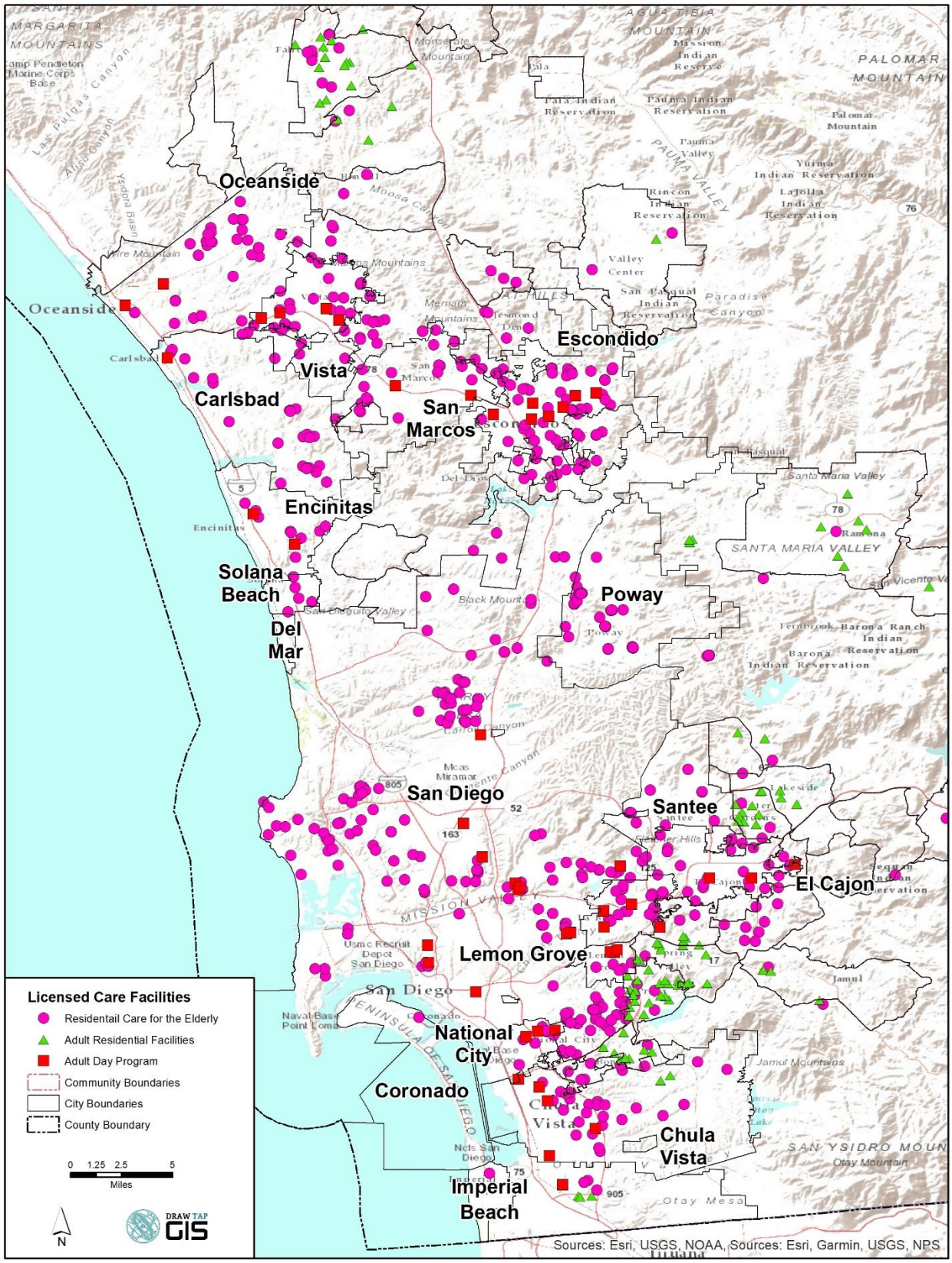
Table 49 provides a tabulation of capacity of licensed care facilities for special needs persons by jurisdiction in 2019. The ratio of beds per 1,000 persons is used to identify concentration of residential care facilities. Licensed care facilities in San Diego County were most concentrated in La Mesa, Carlsbad, Escondido, and Lemon Grove and were least concentrated in Imperial Beach and Del Mar. The Cities of San Diego, Escondido, Chula Vista, and El Cajon had the greatest number of facilities. A high concentration of community care facilities corresponds with the highest proportion of elderly population only for La Mesa. On the other hand, the Urban County jurisdictions of Coronado, Del Mar, and Solana Beach have the highest proportion of senior population but a low concentration of care facilities. These communities also have the highest median age in the County.

Table 49: Licensed Community Care Facilities by Jurisdiction

Jurisdiction	Number of Facilities	Capacity		% Senior Population	Median Age	Zoning Compliant With Lanterman Act
		Beds	Beds/1,000 Population			
Urban County						
Coronado	1	120	5.0	18.40%	34.2	Yes
Del Mar	1	6	1.3	20.80%	43.5	Yes
Imperial Beach	2	38	1.4	9.00%	28.6	Yes
Lemon Grove	17	501	18.4	11.20%	34.7	Yes
Poway	39	373	7.4	12.30%	36.9	Yes
Solana Beach	4	148	10.6	18.70%	41.6	Yes
Unincorporated	168	3,262	6.3	12.80%	N/A	Yes
Total Urban County	232	4,448	6.7	18.40%	34.2	--
Entitlement Jurisdictions						
Carlsbad	29	2,240	19.4	14.00%	38.9	Yes
Chula Vista	73	2,304	8.5	10.00%	33	Yes
El Cajon	98	1,753	16.6	11.00%	31.9	Yes
Encinitas	12	551	8.7	12.80%	37.9	Yes
Escondido	133	2,918	19.1	10.50%	31.2	Yes
La Mesa	35	1,243	20.4	14.20%	37.3	Yes
National City	18	716	11.5	10.60%	28.7	Yes
Oceanside	56	1,608	9.0	12.90%	33.3	Yes
San Diego	349	7,798	5.5	10.70%	32.5	Yes
San Marcos	32	1,166	11.9	10.20%	32.1	Yes
Santee	16	179	3.1	10.70%	34.8	Yes
Vista	72	1,207	11.8	9.20%	30.3	Yes
Total County	**1,155**	**28,131**	**8.4**	**11.40%**	**33.2**	

Source: State of California Department of Social Services, Community Care Licensing Division, January 2020.California Department of Finance, Population Estimates (E5), 2019.

Figure 14: Licensed Care Facilities



L. Accessibility to Opportunities

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. This section addresses access to public transit and employment (Exposure to Adverse Community Factors, inclusive of Public Schools, is addressed in the next Section).

1. Public Transit

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.[31] 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.

The San Diego Association of Governments (SANDAG) is the Regional Transportation Planning Authority responsible for planning and allocating local, state, and federal funds for the region's transportation network. Two primary agencies are responsible for transit operations and services in the county: Metropolitan Transit System (MTS) and the North County Transit District (NCTD). Transit services provided by these agencies include commuter and light rail, fixed-route bus service, demand-response service, and paratransit. Transit services are primarily provided to the larger, more urbanized communities, although limited services are available in unincorporated areas. In addition, tribal governments operating casinos and non-profit agencies also provide transit services for their clients and customers. The NCTD and MTS also own and maintain the main rail line along the coast from downtown San Diego to the Orange County line, which is shared between Amtrak intercity, COASTER, and Metrolink commuter passenger rail services. NCTD also owns the rail corridor between Oceanside and Escondido, operating SPRINTER light rail service. Figure 15 illustrates the transit routes in relation to employment centers.

As shown in Figure 15, public transit providers serve large portions of the western side of the county. In particular, transit use is higher in parts of the region where the greatest investment in transit service has been made: the north coastal, central and south bay regions of the county. Almost all major employment centers in San Diego are served by some form of public transit. However, having regional access to jobs by means of public transit does not necessarily translate into stable employment. Low-income workers, especially female heads of household with children, have unique travel patterns that may prevent them from obtaining work far from home, regardless of access to public transit. Women in general are disproportionately responsible for household-supporting activities such as trips to grocery stores or accompanying young children to and from schools. Women using public transit are often limited to

[31] Ong, Paul and Evelyn Blumenberg, "Job Accessibility and Welfare Usage: Evidence from Los Angeles". UCLA Department of Policy Studies, (1998).

looking for employment near home, allowing them time to complete these household-sustaining trips.[32] The Center for Housing Policy[33] has done extensive research showing that the real cost of housing includes the cost of a household's daily commute to work, and typically low income households spend a much higher proportion of after-tax income on transportation – about one-third – than the average household.[34]

2. Major Employers

As one of the major metropolitan areas in the country, San Diego County has a diverse economy. The San Diego County population and employment growth rates typically correlate to national economic cycles and are sensitive to military spending. Military employment is still concentrated in the region as San Diego County is home to major naval bases and the U.S. Marine base at Camp Pendleton. San Diego is the headquarters of the U.S. Navy's Eleventh Naval District and is the Navy's principal location for West Coast and Pacific Ocean operations. Naval Base San Diego is the principal home to the Pacific Fleet. Naval Air Station (NAS) North Island is located on the north side of Coronado, and is the headquarters for Naval Air Forces and Naval Air Force Pacific, the bulk of the Pacific Fleet's helicopter squadrons, and part of the West Coast aircraft carrier fleet. Marine Corps Base Camp Pendleton is the major west coast base of the United States Marine Corps and serves as its prime amphibious training base.

Major employers, organizations with the largest number of employees, are mostly located throughout the Central Coastal and South Bay sub-regions of San Diego County. Major employers in the region include colleges, university campuses, military, federal and state government, and hospitals and medical centers. Inland/desert areas are still relatively scarce with regard to employment opportunities. The closest major employers to the inland/desert areas are the eight Indian casino/gaming/lodging centers. Because of its location along the Mexican border and adjacent to the Pacific Ocean, international trade is a major economic strength for the region. The border between San Diego and Mexico is the busiest in the world and the San Diego Port contributes a significant number of jobs to the region.

Figure 15 shows that public transit routes provide adequate access to employment centers on the western side of the county. In the eastern inland areas, public transit access and major employers are scarce.

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32 Blumenberg, Evelyn. "Reverse Commute Transit Programs and Single Mothers on Welfare: A Policy Mismatch?", Institute of Transportation Studies, Volume 1 Number 2, (December 2002).

33 Lipman, Barbara J. "A Heavy Load: The Combined Housing and Transportation Burdens of Working Families". Center for Housing Policy, (October 2006).

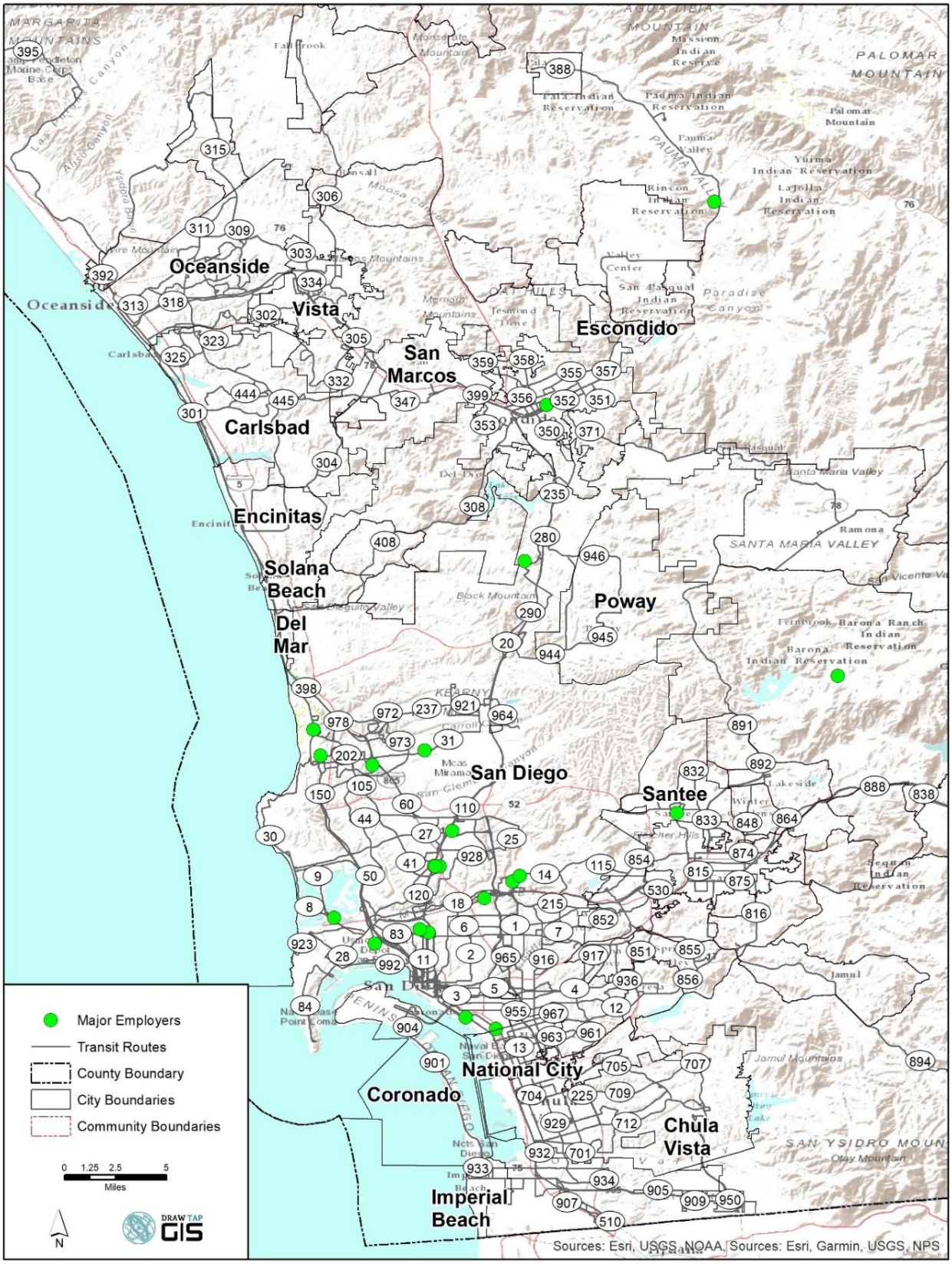
34 Giuliano, Genevieve. "The Role of Public Transit in the Mobility of Low Income Households". School of Policy, Planning, and Development, University of Southern California (May 2001).

Table 50: Major Employers - San Diego County

Name	Address	City	Industry	Employer Size Class
Naval Base San Diego	32nd St Naval Station	San Diego	Federal Government-National Security	10,000+
Barona Resort & Casino	1932 Wildcat Canyon Rd.	Lakeside	Casinos	1,000-4,999
Ceasar Entertainment	33750 Valley Center Rd.	Valley Center	Swimming Pool Construction, Dealers, & Designers	1,000-4,999
Employees' Association-SDG&E	8330 Century Park Ct.	San Diego	Associations	1,000-4,999
General Dynamics NASSCO	2798 Harbor Dr.	San Diego	Ship Builders & Repairers (mfrs)	1,000-4,999
Illumina Inc	5200 Illumina Way	San Diego	Biotechnology Products & Services	1,000-4,999
Kaiser Permanente Vandever Med	4405 Vandever Ave.	San Diego	Physicians & Surgeons	5,000-9,999
Kaiser Permanente Zion Med Ctr	4647 Zion Ave.	San Diego	Hospitals	1,000-4,999
MCCS MCRD (Marine Corps Community Services Marine Corps Recruit Depot)	3800 Chosin Ave.	San Diego	Towing-Marine	10,000+
Merchants Building Maintenance	9555 Distribution Ave.	San Diego	Janitor Service	1,000-4,999
Palomar Pomerado Health Rehab	555 E Valley Pkwy 5th Floor	Escondido	Rehabilitation Services	1,000-4,999
Rady Children's Hospital	3020 Children's Way.	San Diego	Hospitals	1,000-4,999
San Diego Community College	3375 Camino Del Rio S.	San Diego	Junior-Community College-Tech Institutes	5,000-9,999
San Diego County Sheriff	John F. Duffy Administrative Center	San Diego	Police Departments	1,000-4,999
Scripps Mercy Hosp Sn Diego	4077 Fifth Ave.	San Diego	Hospitals	1,000-4,999
Scripps Research Institute	10550 N Torrey Pines Rd.	La Jolla	Laboratories-Research & Development	1,000-4,999
Seaworld San Diego	500 Sea World Dr.	San Diego	Water Parks	1,000-4,999
Sharp Mary Birch Hospital	3003 Health Center Dr.	San Diego	Hospitals	1,000-4,999
Sharp Memorial Hospital	7901 Frost St.	San Diego	Hospitals	1,000-4,999
Sony Electronics	16535 Via Esprillo	San Diego	Electronic Equipment & Supplies-Retail	1,000-4,999
UC San Diego Health	200 W Arbor Dr.	San Diego	Health Care Management	5,000-9,999
University of California San Diego	9500 Gilman Dr.	La Jolla	University-College Dept/Facility/Office	10,000+
US Navy Med Ctr-Orthopedics	34800 Bob Wilson Dr # 112	San Diego	Clinics	1,000-4,999

Source: State of California Employment Development Department, 2020.

Figure 15: Transit Service and Major Employers



3. Affordable Housing and Public Transit

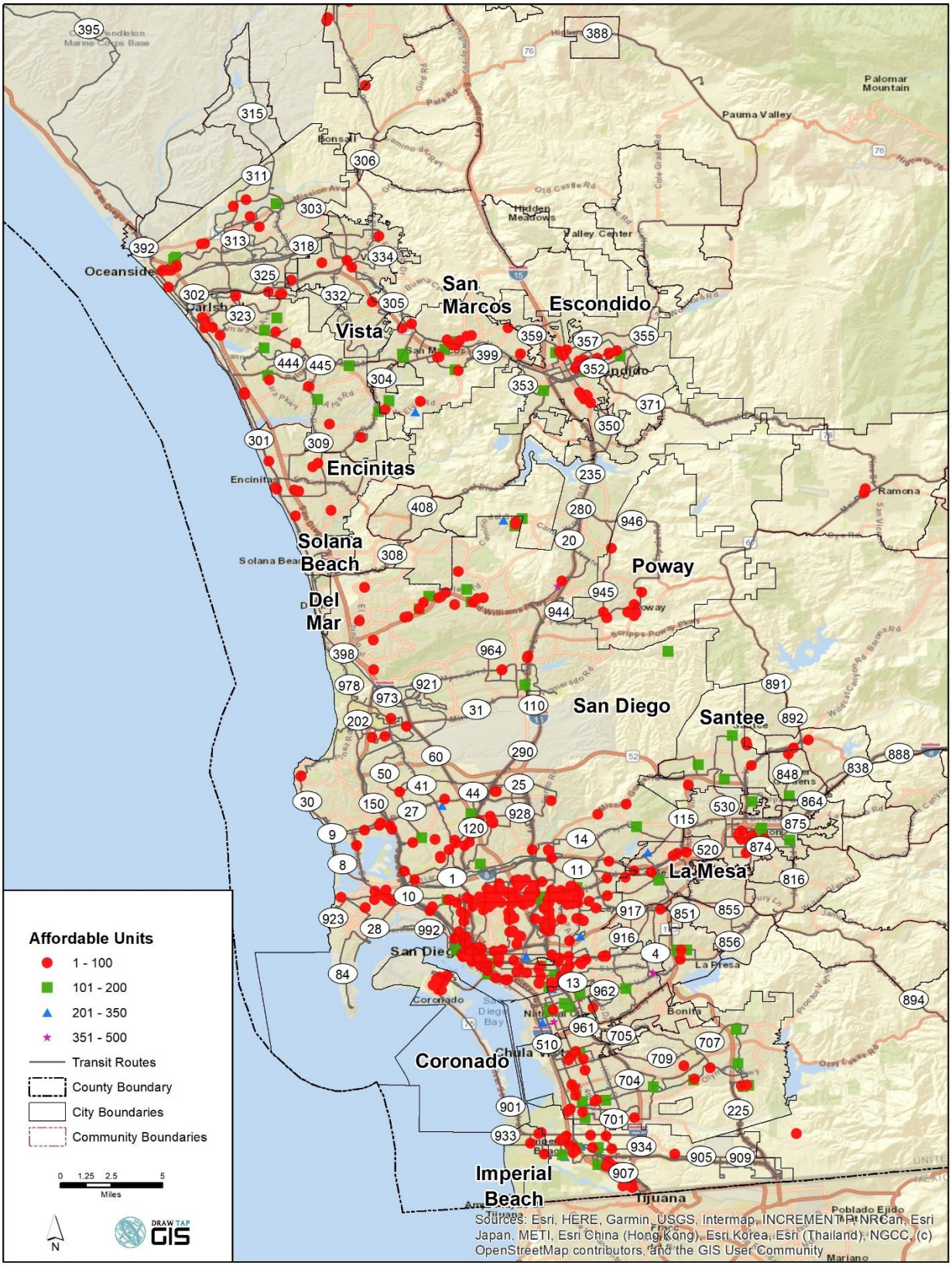
Limited access to public transit may counteract some of the benefits of affordable housing. Current research indicates a strong connection between housing and transportation costs. Housing market patterns in parts of California with job-rich city centers are pushing lower-income families to the outskirts of urban areas, where no transit is available to connect them with jobs and services. In lower-income communities with underserved city centers, many residents must commute out to suburban job-rich areas. In an attempt to save money on housing, many lower-income households are spending disproportionately higher amounts on transportation. A study conducted by the Center for Housing Policy revealed that families who spend more than half of their income on housing spend only eight percent on transportation, while families who spend 30 percent or less of their income on housing spend almost 24 percent on transportation.[35] This equates to more than three times the amount spent by persons living in less affordable housing.

According to the Reconnecting America organization, "for low-income families, the ability to live in an affordable home near good public transportation translates into improved access to healthcare, education and employment opportunities, and reduced commuting costs." [36] Given the benefits of living close to transit, locating assisted housing near public transportation would increase the quality of life of the assisted householders. Figure 16 illustrates the location of the county's affordable housing stock in relation to regional transit services. Many affordable housing projects are located in close proximity to regional transit routes, with the exception of the eastern portions of the county, where few assisted units are located.

[35] Sard, Barbara and Rice, Douglas. "Creating Opportunity for Children How Housing Location Can Make a Difference". Center on Budget and Policy Priorities. (October 2014).

[36] The National Housing Trust Reconnecting America. "Preserving Affordable Housing Near Transit." Enterprise Community Partners (2010).

Figure 16: Transit Service and Publicly Assisted Housing



M. ADA-Compliant Public Facilities (Section 504 Assessment)

Access to civic life by people with disabilities is a fundamental goal of the Americans with Disabilities Act (ADA). To ensure that this goal is met, Title II of the ADA requires State and local governments to make their programs and services accessible to persons with disabilities. This requirement not only extends to physical access at government facilities, programs, and events, but also to policy changes that governmental entities must make to ensure that all people with disabilities can take part in, and benefit from, the programs and services of State and local governments.

The development of an ADA Transition Plan is a requirement of the federal regulations implementing the Rehabilitation Act of 1973, which require that all organizations receiving federal funds make their programs available without discrimination to persons with disabilities. The Transition Plan (also known as a Program Access Plan) identifies physical obstacles that limit the accessibility of facilities to individuals with disabilities, describes the prescribed methods to make the facilities accessible, provides a schedule for making the access modifications, and identifies the public officials responsible for implementation of the transition plan.

Carlsbad, Encinitas, Imperial Beach, National City, San Diego (City), San Diego (County), and Santee provided updates for this report. The County of San Diego has indicated that their government facilities are ADA-compliant. The City of San Diego conducted a Self-Evaluation as mandated under the ADA. From that analysis, a required transition plan was created which included 212 high use city facilities that needed physical modifications to make them accessible. 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 34 of these facilities; an additional 32 facilities are funded and 116 remain unfunded. Both the County of San Diego and the City of San Diego continue to evaluate their public facilities for compliance with current accessibility regulations and update its list of projects needing barrier removal. National City indicated its facilities are not ADA compliant, however the City has a transition plan in place that was adopted in June 2019. Santee also indicated that its City facilities are not fully ADA Compliant, however, there are plans to make all of the City facilities compliant, has an approved ADA Transition Plan, and has made numerous ADA improvements to City Parks, Fire Stations, and other facilities, including City Hall. The City of Carlsbad and City of Imperial Beach indicated that their government facilities are ADA-compliant, as all improvements identified in their ADA Transitions Plans are complete. The City of Encinitas indicated that they have an approved Self-Evaluation and ADA Transition Plan.

Table 51: ADA-Compliant Public Facilities

Jurisdiction	ADA Transition Plan	Facilities ADA Compliant
Urban County		
Coronado		
Del Mar		
Imperial Beach	Yes	Yes
Lemon Grove		
Poway		
Solana Beach		
Entitlement Cities		
Carlsbad	Yes	Yes
Chula Vista		
El Cajon		
Encinitas	Yes	In progress
Escondido		
La Mesa		
National City	Yes	In progress
Oceanside		
San Diego	Yes	In progress
San Marcos		
Santee	Yes	In progress
Vista		
San Diego County		Yes

Note: Jurisdictions with empty cells did not provide information regarding ADA compliance.

N. Exposure to Adverse Community Factors

Communities must consider fair housing when addressing exposure to community factors adverse to their quality of life and poverty mitigation because either the problems themselves, or solution to the problems, may have a disproportionate negative effect on some residents. Community factors of concern include disparities in access to opportunities affecting including public education, transit/transportation, jobs/labor, and environmental health. Another concern are environmental risks to vulnerable populations, including pregnant women, young children, and individuals with disabilities—all of whom are protected under fair housing law.

1. Public Schools

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.

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.

Figure 17 and Figure 18 show the location of Title I schools in San Diego County. 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.[37]

[37] Sard, Barbara and Rice, Douglas. "Creating Opportunity for Children How Housing Location Can Make a Difference". Center on Budget and Policy Priorities. (October 2014).

Figure 17: Distribution of Title I Schools and Low- and Moderate-Income Areas

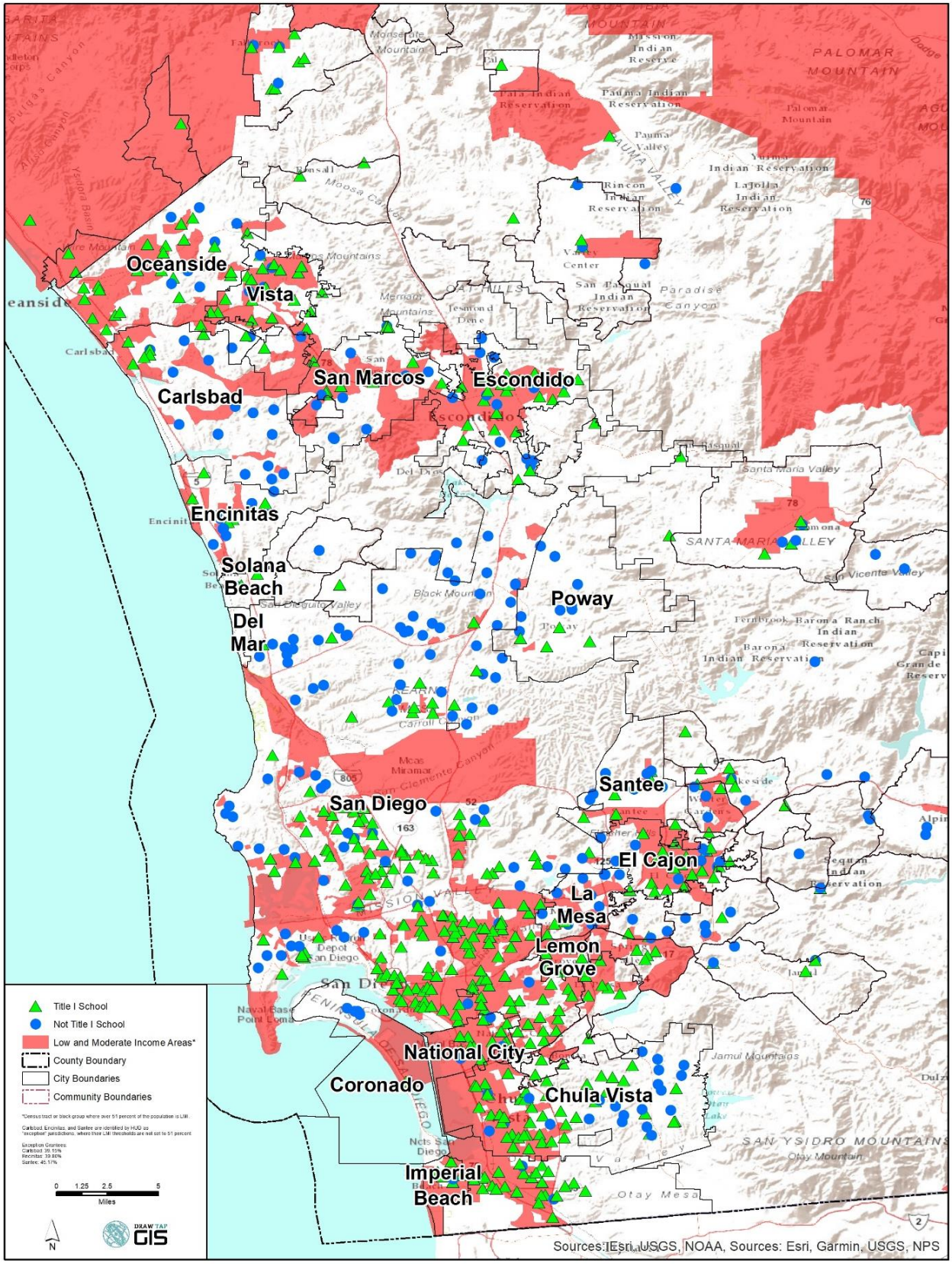
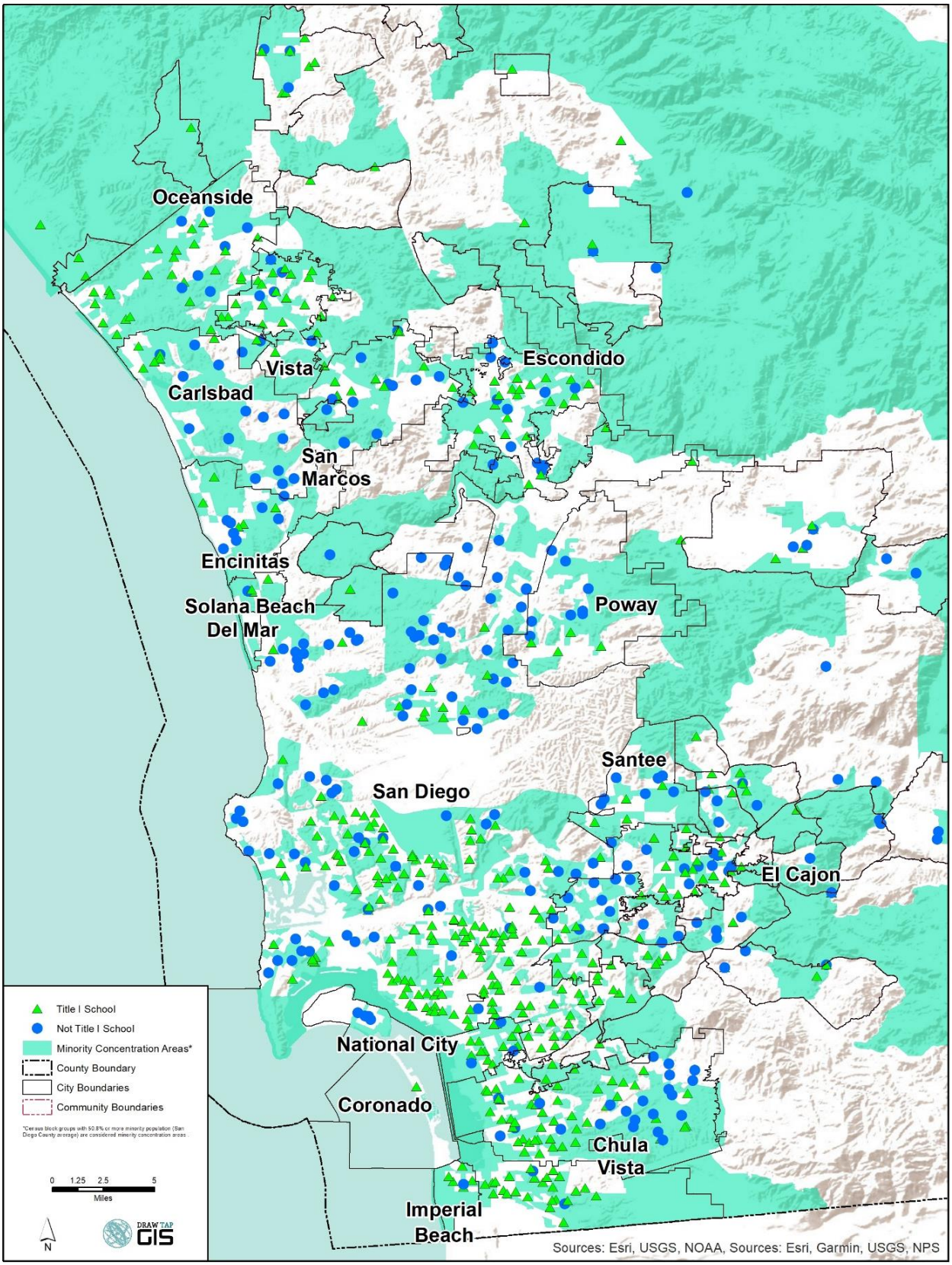


Figure 18: Distribution of Title I Schools and Areas of Minority Concentration Area



2. Disparities in Access to Opportunity

HUD has developed a series of indices 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. These indices are only available to Entitlement Jurisdictions (with population over 50,000 and receiving CDBG funds from HUD). For Urban County jurisdictions for which a HUD-provided index is not provided, a similar analysis as that provided by the indices was conducted using comparable information. For example, for the Low Poverty Index, the poverty status of the population provided by the 2013-2017 American Community Survey estimates were used.

Table 52 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.***

As shown in Table 52, 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. Additional detailed breakdowns by Entitlement Jurisdiction are shown in Table 52. For the smaller jurisdictions (with population less than 50,000) participating in the HUD programs as part of the Urban County, the report utilizes other sources of data to provide similar analysis.

Table 52: Opportunity Indicators by Race/Ethnicity – Entitlement Jurisdictions

	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
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
Carlsbad							
Total Population							
White, Non-Hispanic	56.98	88.09	70.63	87.29	64.71	54.62	56.23
Black, Non-Hispanic	58.41	87.68	72.18	86.91	64.92	63.87	54.04
Hispanic	53.57	84.92	64.92	87.35	67.62	56.59	52.54
Asian or Pacific Islander, Non-Hispanic	58.22	89.63	73.27	87.17	64.04	57.91	56.49
Native American, Non-Hispanic	56.38	83.47	66.64	87.15	66.85	60.13	53.79
Population below federal poverty line							
White, Non-Hispanic	54.04	86.83	67.87	87.02	66.3	54.77	54.96
Black, Non-Hispanic	46.85	93.95	70.88	86.44	57.14	47.44	58.41
Hispanic	48.35	82.09	61.14	87.85	69.88	60.68	50.51
Asian or Pacific Islander, Non-Hispanic	51.63	88.62	69.97	90.35	73.31	46.14	57.38
Native American, Non-Hispanic	31.00	86.82	68.00	92.00	75.00	50.36	71.00

Table 52: Opportunity Indicators by Race/Ethnicity – Entitlement Jurisdictions

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Chula Vista							
Total Population							
White, Non-Hispanic	65.41	69.32	48.41	83.96	64.09	52.89	39.92
Black, Non-Hispanic	62.25	69.74	47.89	86.1	66.52	55.89	38.15
Hispanic	54.71	64.74	38.93	87.71	69.38	53.35	35.32
Asian or Pacific Islander, Non-Hispanic	73.70	74.41	58.92	83.65	61.59	53.95	40.95
Native American, Non-Hispanic	56.87	66.29	40.33	86.75	68.86	55.53	37.19
Population below federal poverty line							
White, Non-Hispanic	54.91	68.71	41.46	86.61	69.61	55.5	37.15
Black, Non-Hispanic	36.78	62.01	27.56	91.31	76.50	56.96	29.09
Hispanic	39.43	61.19	28.35	89.97	75.32	56.76	31.86
Asian or Pacific Islander, Non-Hispanic	46.94	62.93	35.44	88.98	71.40	46.31	30.76
Native American, Non-Hispanic	53.31	69.93	44.32	85.73	68.56	54.61	40.06
El Cajon							
Total Population							
White, Non-Hispanic	34.31	57.15	31.85	87.87	74.73	55.87	25.51
Black, Non-Hispanic	22.38	51.51	24.01	91.16	80.62	58.30	20.24
Hispanic	24.02	52.85	24.75	90.45	78.93	57.18	21.95
Asian or Pacific Islander, Non-Hispanic	30.57	54.15	29.31	88.97	76.95	57.27	23.22
Native American, Non-Hispanic	29.17	55.97	27.51	89.00	76.98	56.93	23.95
Population below federal poverty line							
White, Non-Hispanic	19.39	52.91	20.82	91.51	80.07	55.85	22.47
Black, Non-Hispanic	11.70	49.66	15.47	92.94	83.40	63.33	17.01
Hispanic	17.74	52.63	21.92	91.58	81.06	58.48	20.62
Asian or Pacific Islander, Non-Hispanic	17.43	54.99	22.33	91.85	79.27	50.48	22.24
Native American, Non-Hispanic	12.14	56.01	11.98	94.35	85.6	56.03	15.43

Table 52: Opportunity Indicators by Race/Ethnicity – Entitlement Jurisdictions

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Encinitas							
Total Population							
White, Non-Hispanic	63.69	79.79	76.64	85.15	66.08	62.34	65.91
Black, Non-Hispanic	60.80	81.90	74.07	84.07	65.39	63.41	67.20
Hispanic	59.78	80.52	73.07	85.61	66.44	57.09	65.67
Asian or Pacific Islander, Non-Hispanic	63.94	79.74	75.98	84.26	64.83	63.57	66.08
Native American, Non-Hispanic	61.90	80.83	77.06	86.31	67.7	58.66	66.58
Population below federal poverty line							
White, Non-Hispanic	62.73	81.38	77.22	85.19	67.46	65.58	66.43
Black, Non-Hispanic	40.00	94.94	54.00	73.00	53.00	59.69	70.00
Hispanic	49.48	83.75	73.41	87.92	70.29	57.08	67.57
Asian or Pacific Islander, Non-Hispanic	63.18	78.08	76.72	86.37	65.1	54.08	65.32
Native American, Non-Hispanic	31.00	86.82	68.00	92.00	75.00	50.36	71.00
Escondido							
Total Population							
White, Non-Hispanic	43.28	37.79	41.14	78.66	63.19	41.67	39.58
Black, Non-Hispanic	33.94	28.16	32.53	86.74	71.34	42.83	33.46
Hispanic	30.08	21.66	29.39	88.31	72.37	42.35	30.93
Asian or Pacific Islander, Non-Hispanic	42.64	34.36	39.52	80.57	64.68	40.38	38.63
Native American, Non-Hispanic	37.19	28.36	35.76	84.03	68.32	44.13	34.78
Population below federal poverty line							
White, Non-Hispanic	35.98	32.2	37.19	84.22	68.56	42.83	35.4
Black, Non-Hispanic	26.28	22.15	31.14	88.59	76.63	42.18	30.13
Hispanic	25.71	20.75	26.71	90.17	75.36	46.89	27.52
Asian or Pacific Islander, Non-Hispanic	21.05	16.34	28.22	88.42	68.27	39.84	31.09
Native American, Non-Hispanic	28.73	22.45	26.37	89.23	75.52	28.60	32.84

Table 52: Opportunity Indicators by Race/Ethnicity – Entitlement Jurisdictions

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
La Mesa							
Total Population							
White, Non-Hispanic	61.16	68.68	60.78	89.24	78.00	57.47	30.71
Black, Non-Hispanic	55.07	61.30	55.90	90.02	78.98	59.59	29.24
Hispanic	58.63	64.56	58.06	89.57	78.42	58.95	29.82
Asian or Pacific Islander, Non-Hispanic	58.50	62.51	57.44	89.7	78.28	56.02	30.23
Native American, Non-Hispanic	58.04	63.49	56.41	89.72	78.17	58.13	29.70
Population below federal poverty line							
White, Non-Hispanic	60.07	68.63	59.5	89.63	79.22	63.90	30.92
Black, Non-Hispanic	43.60	55.39	40.49	91.63	81.08	63.07	26.66
Hispanic	51.55	63.82	55.25	90.36	80.26	63.12	28.65
Asian or Pacific Islander, Non-Hispanic	55.39	65.15	53.25	90.82	79.48	58.08	30.81
Native American, Non-Hispanic	64.66	43.29	48.95	89.39	73.23	46.96	29.05
National City							
Total Population							
White, Non-Hispanic	26.34	43.72	23.61	72.63	73.64	69.90	37.58
Black, Non-Hispanic	23.89	43.73	21.65	75.24	75.84	65.29	36.49
Hispanic	21.74	39.84	22.83	87.27	78.85	52.60	36.83
Asian or Pacific Islander, Non-Hispanic	24.64	45.55	27.13	88.11	78.09	59.39	36.80
Native American, Non-Hispanic	23.95	41.65	21.48	74.45	75.35	65.53	37.15
Population below federal poverty line							
White, Non-Hispanic	20.02	43.54	20.63	86.62	80.33	60.64	36.51
Black, Non-Hispanic	14.34	39.00	16.26	92.77	83.85	47.55	35.56
Hispanic	18.64	39.69	21.71	89.20	81.33	53.94	36.15
Asian or Pacific Islander, Non-Hispanic	18.99	46.55	33.29	92.66	83.71	66.3	36.44
Native American, Non-Hispanic	28.82	50.82	32.27	87.56	75.12	47.05	37.46

Table 52: Opportunity Indicators by Race/Ethnicity – Entitlement Jurisdictions

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Oceanside							
Total Population							
White, Non-Hispanic	53.73	50.45	45.6	86.58	65.37	46.16	42.91
Black, Non-Hispanic	50.82	49.21	40.33	87.26	65.64	43.06	41.48
Hispanic	45.20	42.52	36.15	87.80	67.19	38.18	40.28
Asian or Pacific Islander, Non-Hispanic	53.49	51.54	43.13	86.59	63.23	42.73	43.03
Native American, Non-Hispanic	48.60	43.64	39.83	87.25	67.76	46.11	41.52
Population below federal poverty line							
White, Non-Hispanic	46.73	42.01	39.93	88.36	69.82	47.45	41.82
Black, Non-Hispanic	38.33	33.45	31.98	90.09	73.53	46.19	42.61
Hispanic	35.87	30.17	32.26	89.42	72.41	43.46	37.40
Asian or Pacific Islander, Non-Hispanic	51.67	50.85	39.48	87.25	61.54	41.53	43.14
Native American, Non-Hispanic	39.13	30.18	38.02	84.62	65.63	52.66	38.89
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	37.4	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

Table 52: Opportunity Indicators by Race/Ethnicity – Entitlement Jurisdictions

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
San Marcos							
Total Population							
White, Non-Hispanic	51.24	80.35	44.17	86.26	58.76	57.85	47.26
Black, Non-Hispanic	47.23	75.73	40.45	87.51	61.71	56.39	43.82
Hispanic	43.10	65.37	34.64	89.92	65.89	49.74	36.64
Asian or Pacific Islander, Non-Hispanic	45.83	78.76	44.33	86.13	58.59	55.01	47.72
Native American, Non-Hispanic	50.14	72.69	40.00	88.08	63.59	54.76	41.49
Population below federal poverty line							
White, Non-Hispanic	46.98	76.51	41.72	86.81	61.55	54.93	44.75
Black, Non-Hispanic	48.95	72.59	41.78	89.36	63.89	52.96	41.71
Hispanic	36.20	58.52	33.06	91.14	69.37	45.58	33.97
Asian or Pacific Islander, Non-Hispanic	40.97	63.27	34.36	90.16	69.26	58.82	34.83
Native American, Non-Hispanic	58.46	86.70	44.35	86.76	64.26	69.49	47.15
Santee							
Total Population							
White, Non-Hispanic	69.83	78.14	49.29	84.84	64.16	44.37	47.24
Black, Non-Hispanic	68.69	79.70	40.44	83.79	66.05	56.11	45.21
Hispanic	69.41	78.36	47.70	84.77	64.75	48.32	46.15
Asian or Pacific Islander, Non-Hispanic	69.90	79.62	47.36	84.22	64.42	49.78	46.20
Native American, Non-Hispanic	70.35	77.07	48.44	84.06	63.91	43.52	47.93
Population below federal poverty line							
White, Non-Hispanic	65.71	77.7	48.15	84.63	64.63	48.01	44.73
Black, Non-Hispanic	69.79	77.16	56.49	85.38	61.96	63.50	49.63
Hispanic	69.44	79.81	49.54	83.95	64.00	48.99	46.61
Asian or Pacific Islander, Non-Hispanic	75.16	74.24	55.79	86.75	66.23	50.10	46.26
Native American, Non-Hispanic	66.24	83.59	61.38	81.16	59.21	30.44	53.33

Table 52: Opportunity Indicators by Race/Ethnicity – Entitlement Jurisdictions

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Vista							
Total Population							
White, Non-Hispanic	42.50	45.98	33.25	87.97	66.11	53.16	46.57
Black, Non-Hispanic	41.84	42.91	29.49	89.43	68.67	52.55	44.7
Hispanic	37.97	32.22	26.59	90.00	68.53	48.01	41.73
Asian or Pacific Islander, Non-Hispanic	43.33	47.70	33.89	88.5	66.78	54.41	45.63
Native American, Non-Hispanic	39.87	39.52	28.71	89.24	67.84	53.47	43.49
Population below federal poverty line							
White, Non-Hispanic	39.91	39.30	30.72	88.80	67.05	50.27	45.17
Black, Non-Hispanic	30.99	49.43	34.35	89.18	67.87	55.12	45.40
Hispanic	32.99	29.16	24.82	90.26	68.64	48.35	40.60
Asian or Pacific Islander, Non-Hispanic	40.76	51.93	30.98	89.65	69.40	56.11	46.67
Native American, Non-Hispanic	39.96	24.06	26.20	89.68	65.39	51.54	51.34

Source: Affirmatively Furthering Fair Housing (AFFH) Data and Mapping Tool (AFFH-T), 2017

The following tables indicate similar opportunity characteristics for the Urban County jurisdictions. As shown in Table 53, the cities of Imperial Beach (19.0 percent) and Lemon Grove (13.8 percent) had the highest population ratio below the poverty level. In the Urban County, generally American Indian/Alaskan Native and Black or African American residents had the highest poverty rates compared to other racial/ethnic groups.

According to Table 54, a large percentage of schools in Imperial Beach, Lemon Grove and Solano Beach are considered Title I schools, and help low-achieving children meet state standards in core academic subjects. These schools coordinate and integrate resources and services from federal, state, and local sources. To be considered for Title 1 school funds, at least 40 percent of the students must be considered low-income.

When considering labor market participation, the unemployment rates of the Urban County show that the cities of Imperial Beach and Lemon Grove had slightly higher unemployment rates than overall San Diego County (2.8 percent).

Table 54 shows that the majority of Urban County city residents had commutes under 30 minutes. AllTransit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the data provided, the cities of Lemon Grove (7.9), Imperial Beach (6.7), and Coronado (6.6) scored the highest, illustrating a moderate combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work (Table 55).

Table 53: Opportunity Indicator - Poverty Rate – Urban County Participating Jurisdictions

Race/Ethnicity	Coronado			Del Mar			Imperial Beach		
	Total	Below Poverty Level	Percent Below Poverty Level	Total	Below Poverty Level	Percent Below Poverty Level	Total	Below Poverty Level	Percent Below Poverty Level
Population for whom poverty status is determined	20,330	1,082	5.3%	4,321	300	6.9%	27,001	5,117	19.0%
White alone	18,610	961	5.2%	4,146	274	6.6%	19,203	3,636	18.9%
Black or African American alone	188	11	5.9%	21	0	0.0%	1,067	334	31.3%
American Indian and Alaska Native alone	53	0	0.0%	0	0	-	317	72	22.7%
Asian alone	613	44	7.2%	112	26	23.2%	2,206	304	13.8%
Native Hawaiian and Other Pacific Islander alone	23	0	0.0%	0	0	-	195	0	0.0%
Some other race alone	150	12	8.0%	0	0	-	1,524	231	15.2%
Two or more races	693	54	7.8%	42	0	0.0%	2,489	540	21.7%
Race/Ethnicity	**Lemon Grove**			**Poway**			**Solana Beach**		
	Total	**Below Poverty Level**	**Percent Below Poverty Level**	**Total**	**Below Poverty Level**	**Percent Below Poverty Level**	**Total**	**Below Poverty Level**	**Percent Below Poverty Level**
Population for whom poverty status is determined	26,422	3,646	13.8%	49,353	3,331	6.7%	13,340	656	4.9%
White alone	17,161	1,879	10.9%	37,575	2,390	6.4%	11,148	454	4.1%
Black or African American alone	3,547	827	23.3%	607	55	9.1%	81	14	17.3%
American Indian and Alaska Native alone	146	82	56.2%	461	219	47.5%	120	24	20.0%
Asian alone	1,527	104	6.8%	6,480	263	4.1%	685	75	10.9%
Native Hawaiian and Other Pacific Islander alone	122	22	18.0%	18	0	0.0%	0	0	-
Some other race alone	2,205	247	11.2%	1,670	231	13.8%	614	32	5.2%
Two or more races	1,714	485	28.3%	2,542	173	6.8%	692	57	8.2%

Source: American Community Survey 2013-2017, S1701

Table 54: Opportunity Indicators – School Proficiency, Labor Market, Job Proximity – Urban County Participating Jurisdictions

Opportunity Indicator	Coronado	Del Mar	Imperial Beach	Lemon Grove	Poway	Solana Beach
School Proficiency						
Total Title I Schools	1	1	5	5	4	3
Total Schools	5	2	6	5	12	4
% of Schools	20.0%	50.0%	83.3%	100.0%	33.3%	75.0%
Unemployment Rate						
Annual Rate	2.2%	1.5%	3.5%	3.2%	2.2%	1.4%
Job Proximity						
<29 mins.	79.3%	75.7%	51.5%	63.7%	59.6%	70.5%
30-59 mins.	16.2%	16.0%	41.8%	29.2%	35.3%	24.6%
60 mins. or more	4.5%	8.3%	6.7%	7.1%	5.1%	4.9%

Source: California Department of Education, Public Schools and Districts Data File 18-19, Feb 2020; American Community Survey 2013-2017, S0801; CalEnviroScreen 3.0 Results (June 2018 Update).

Table 55: Opportunity Indicators – Transit – Urban County Participating Jurisdictions

	All Transit Performance Score	Transit Trips Per Week within 1/2 Mile	Jobs Accessible in 30-min trip	Commuters Who Use Transit	Transit Routes within 1/2 Mile
Coronado	6.6	916	86,924	2.30%	1
Del Mar	5.1	738	58,060	0.03%	2
Imperial Beach	6.7	1,188	31,400	4.25%	3
Lemon Grove	7.9	1,274	75,237	4.45%	5
Poway	3.1	432	15,312	1.29%	2
Solano Beach	5.9	950	68,617	2.02%	3

Source: https://alltransit.cnt.org/metrics/, accessed March 13, 2020.

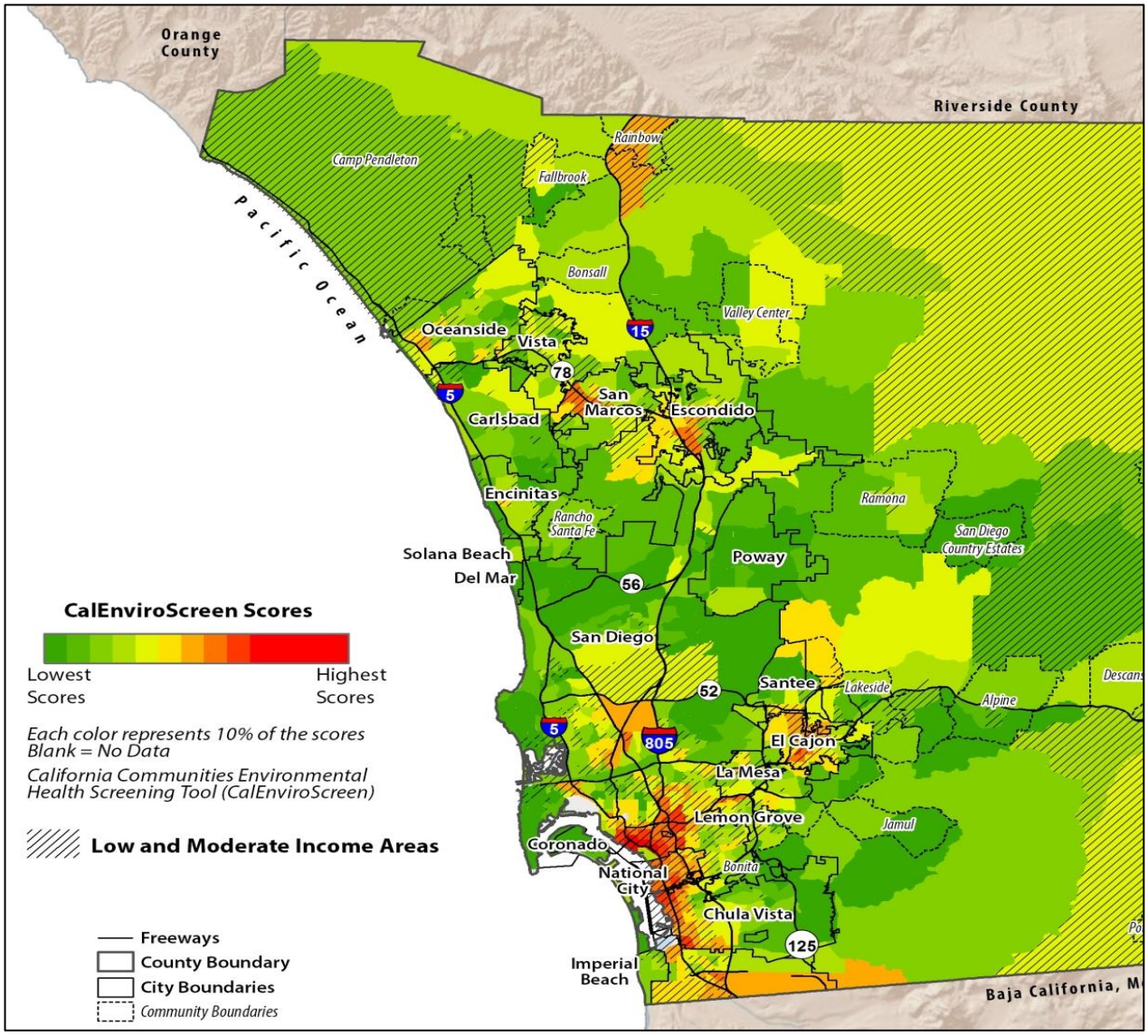
Continuing the analysis of Urban County jurisdictions for which the HUD Environmental Health Index was not provided, the Environmental Health Screening tool (CalEnviroScreen) was used. The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify 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. Table 56 shows the Urban County's CalEnviroScreen scores by census tract in Urban County jurisdictions. High scoring communities tend to be more burdened by pollution from multiple sources and most vulnerable to its effects, taking into account their socioeconomic characteristics and underlying health status. As expected, the areas indicated as having higher EnviroScreen scores generally matched the geographic distribution of minorities, low- and moderate-income persons, and poverty concentrations.

Table 56: Opportunity Indicators – Environmental Health – Urban County Participating Jurisdictions

Urban County	Census Tract	Total Population	CES 3.0 Score
Coronado	6073021600	3391	13.59
	6073011000	2799	6.18
	6073021800	2022	5.73
	6073010800	2390	5.70
	6073010900	1750	4.77
	6073011100	3698	4.71
	6073010601	2127	4.67
	6073009902	2	NA
Del Mar	6073017029	8823	7.62
	6073017306	2818	3.69
	6073017200	4146	2.89
	6073008324	6600	2.11
Imperial Beach	6073010402	5558	30.50
	6073010502	5514	24.30
	6073010200	6800	23.76
	6073010300	4507	23.55
	6073010401	2458	19.82
	6073010501	1433	15.27
Lemon Grove	6073014400	3523	39.22
	6073014300	3618	31.85
	6073014001	4630	24.52
	6073014200	6277	23.65
	6073014101	3507	20.27
	6073014002	4488	19.38
Poway	6073017049	2919	16.25
	6073017048	6123	13.73
	6073017009	4024	10.78
	6073017040	4363	9.05
	6073017020	3694	8.58
	6073017010	3152	8.17
	6073017054	5810	6.87
	6073017041	6147	6.18
	6073017053	3364	5.01
	6073017006	2876	3.73
Solano Beach	6073017304	5508	12.39
	6073017303	3018	6.78
	6073017305	2969	3.05

Source: CalEnviroScreen 3.0 Results (June 2018 Update).

Figure 19: Environmental Exposure



CHAPTER 4

LENDING PRACTICES

AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent lending/credit crisis. This chapter reviews the lending practices of financial institutions and the access to financing for all households, particularly minority households. Lending patterns in low and moderate income neighborhoods and areas of minority concentration are also examined. However, publicly available data on lending does not contain the detailed information necessary to make conclusive statements of discrimination, but it can point out potential areas of concern. Furthermore, except for outreach and education efforts, local jurisdictions' ability to influence lending practices is limited. Such practices are largely governed by national policies and regulations.

A. Background

1. Legislative Protection

In the past, credit market distortions and other activities such as "redlining" were prevalent and prevented some groups from having equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending.

Community Reinvestment Act

The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of their entire communities, including low and moderate income neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance. CRA ratings are provided by the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), and Office of the Comptroller of the Currency (OCC). However, the CRA rating is an overall rating for an institution and does not provide insights regarding the lending performance at specific locations by the institution.

Home Mortgage Disclosure Act

In tandem with the CRA, the Home Mortgage Disclosure Act requires lending institutions to make annual public disclosures of their home mortgage lending activity. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants. This section examines detailed 2012 and 2017 HMDA data for San Diego County.[38]

[38] 2017 HMDA data is the most updated lending data available that can provide consistent comparative analysis of data from 2012. In 2018, the FFIEC changed the reporting format, making comparison with prior years for trends difficult.

HMDA data provide some insight into the lending patterns that exist in a community. However, HMDA data are only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices due to the lack of detailed information on loan terms or specific reasons for denial.

Conventional versus Government-Backed Financing

Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. To assist lower and moderate income households that may have difficulty in obtaining home mortgage financing in the private market due to income and equity issues, several government agencies offer loan products that have below market interest rates and are insured ("backed") by the agencies. Sources of government-backed financing include loans insured by the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the Rural Housing Services/Farm Service Agency (RHA/FSA). Often government-backed loans are offered to the consumers through private lending institutions. Local programs such as first-time homebuyer and rehabilitation programs are not subject to HMDA reporting requirements and therefore are not included in this analysis.

Financial Stability Act

The Financial Stability Act of 2009 established the Making Home Affordable Program, which assists eligible homeowners who can no longer afford their home with mortgage loan modifications and other options, including short sale or deed-in-lieu of foreclosure. The program is targeted toward homeowners facing foreclosure and homeowners who are unemployed or "underwater" (i.e., homeowners who owe more on their mortgage than their home is worth).

For homeowners who can no longer afford their homes but do not want to go into foreclosure, the Home Affordable Foreclosure Alternatives Program (HAFA) offers homeowners, their mortgage servicers, and investor incentives for completing a short sale or deed-in-lieu of foreclosure. HAFA enables homeowners to transition to more affordable housing while being released from their mortgage debt. The program also includes a "cash for keys" component whereby a homeowner receives financial assistance to help with relocation costs in return for vacating their property in good condition.

Helping Families Save Their Homes Act

The Helping Families Save Their Homes Act was passed by Congress in May 2009 and expands the Making Home Affordable Program. This Act includes provisions to make mortgage assistance and foreclosure prevention services more accessible to homeowners and increases protections for renters living in foreclosed homes. It also establishes the right of a homeowner to know who owns their mortgage and provides over two billion dollars in funds to address homelessness. Under this bill, tenants also have the right to stay in their homes after foreclosure for 90 days or through the term of their lease.

Fraud Enforcement and Recovery Act

The Fraud Enforcement and Recovery Act (FERA) enhances the criminal enforcement of federal fraud laws by strengthening the capacity of federal prosecutors and regulators to hold accountable those who have committed fraud. FERA amends the definition of a financial institution to include private mortgage brokers and non-bank lenders that are not directly regulated or insured by the federal

government, making them liable under federal bank fraud criminal statutes. The new law also makes it illegal to make a materially false statement or to willfully overvalue a property in order to manipulate the mortgage lending business.

B. Overall Lending Patterns

1. Data and Methodology

The availability of financing affects a person's ability to purchase or improve a home. Under the HMDA, lending institutions are required to disclose information on the disposition of loan applications by the income, gender, and race of the applicants. This applies to all loan applications for home purchases, improvements, and refinancing, whether financed at market rate or with government assistance.

HMDA data are submitted by lending institutions to the FFIEC. Certain data is available to the public via the FFIEC site either in raw data format or as pre-set printed reports. The analyses of HMDA data presented in this AI were conducted using Lending Patterns™. Lending Patterns is a web-based data exploration tool that analyzes lending records to produce reports on various aspects of mortgage lending. It analyzes HMDA data to assess market share, approval rates, denial rates, low/moderate income lending, and high-cost lending, among other aspects.

General Overview

A detailed summary of the disposition of loan applications submitted to financial institutions in 2012 and 2017 (the most recent HMDA data available) by residents (or prospective residents) of San Diego County can be found in Appendix B. Included is information on loan types and outcomes. In 2017, the cities of San Diego, Chula Vista, and Oceanside recorded the most loan applications, while the cities of Del Mar, Solana Beach, Coronado recorded the fewest due to the built out character of these small communities.

The loan approval rates varied somewhat by jurisdiction. Applications from the cities of Carlsbad, La Mesa, Poway and Santee generally exhibited higher approval rates (over 67 percent). By contrast, applications from the cities of National City, Imperial Beach, and Chula Vista had slightly lower approval rates (ranging from 57 percent to 61 percent). However, the differences are not significant.

Overall, approval rates were slightly lower in 2017 than in 2012. In 2012, the cities of La Mesa, Carlsbad, and Poway recorded the highest home loan approval rates; these approval rates ranged from 74 to 76 percent. The cities with the lowest loan approval rates were the same in 2012 as in 2017 (Imperial Beach, Chula Vista, and National City, under 65 percent). However, the discrepancies in approval rates between the high-rate and the low-rate cities have substantially narrowed since 2012.

Aside from income, another major impediment to securing a home loan is insufficient understanding of the homebuying and lending processes. About 14 percent of all applications countywide were withdrawn by the applicants or deemed incomplete by the financial institution in 2012. The rate of withdrawn or incomplete applications was higher in 2017 (21 percent). The highest rates of withdrawn/closed applications were seen in Lemon Grove, National City, and Solana Beach, which

are also some of the cities with the lowest approval rates. .Withdrawn or closed applications can be indicative of a lack of knowledge about the homebuying and lending process.

Home Purchase Loans

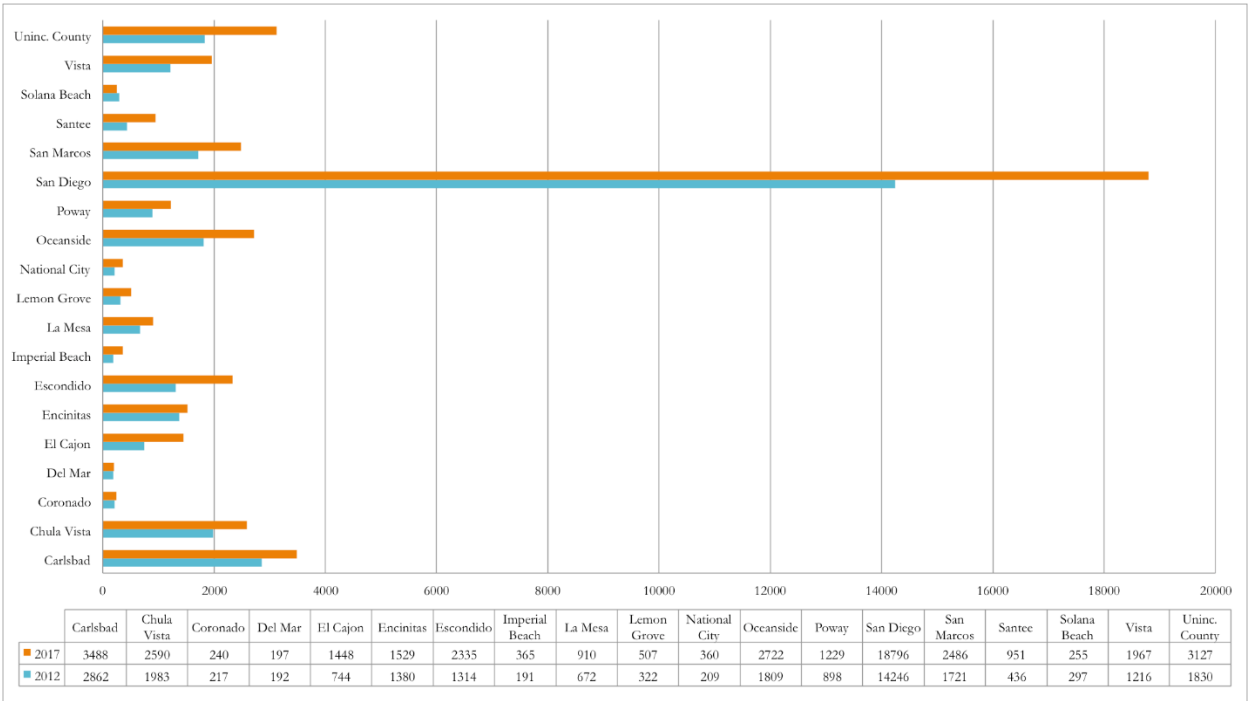
In 2017, a total of 37,949 households applied for conventional loans to purchase homes in San Diego County, representing an increase of approximately 41 percent from 2012. This trend is indicative of a housing market that is slowly recovering from its peak in 2006-2007.

The approval rate countywide in 2017 for conventional home purchase loans was 64 percent, while the denial rate was 15 percent. As mentioned previously, approval rates were slightly higher in 2012. Specifically, the countywide approval rate for conventional home purchase loans was 76 percent in 2012 and the denial rate was 11 percent. When the housing market began to show signs of collapse and foreclosures were on the rise in 2007, many financial institutions instituted stricter approval criteria for potential borrowers, which caused approval rates to drop. However, as time passed, the applicant pool for mortgage lending also became smaller and increasingly selective.

As an alternative to conventional home loans, potential homeowners can choose to apply for government-backed home purchase loans when buying their homes. In a conventional loan, the lender takes on the risk of losing money in the event a borrower defaults on a mortgage. For government-backed loans, the loan is insured, either completely or partially, by the government. The government does not provide the loan itself, but instead promises to repay some or all of the money in the event a borrower defaults. This reduces the risk for the lender when making a loan. Government-backed loans generally have more lenient credit score requirements, lower downpayment requirements, and are available to those with recent bankruptcies. However, these loans may also carry higher interest rates and most require homebuyers to purchase mortgage insurance. Furthermore, government-backed loans have strict limits on the amount a homebuyer can borrow for the purchase of a home. In competitive and high-end housing markets, many of the homes available for purchase exceed the maximum allowable loan amount.

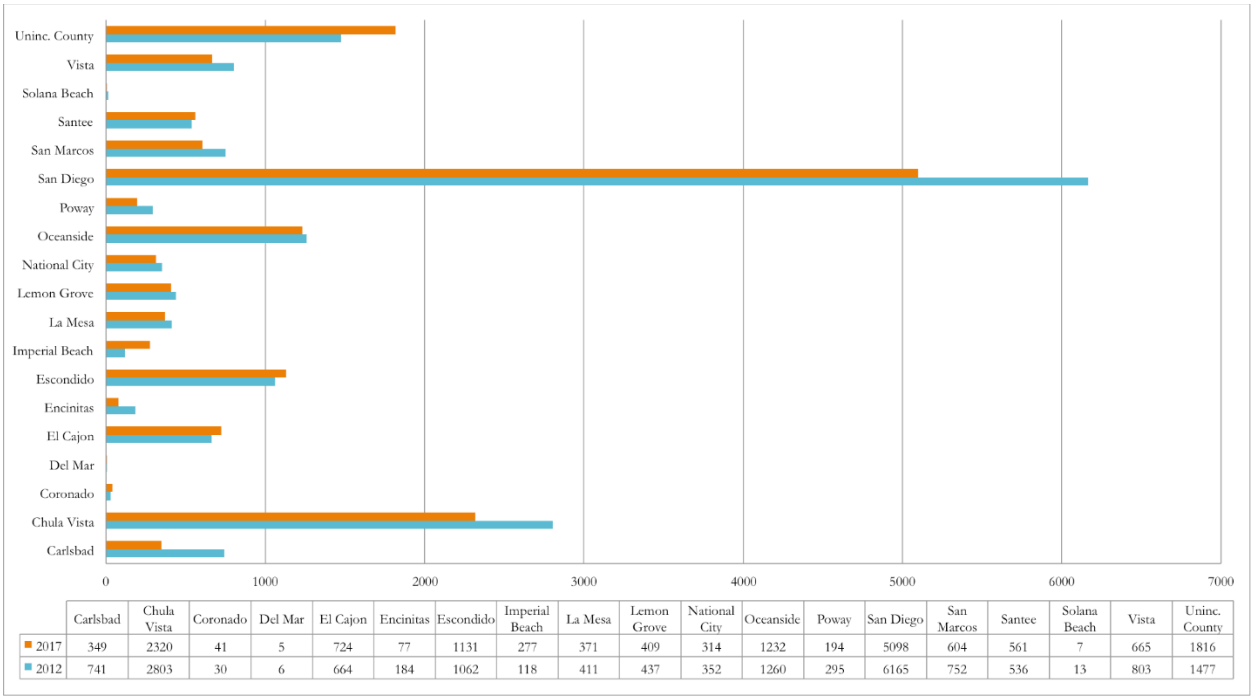
In 2017, 13,515 San Diego County households applied for government-backed loans—comparable in terms of the number of households who applied for this type of loan in 2012 (15,141 households), but represented a lower proportion of all loan applicants in 2017. Unlike approval rates for conventional loans, the approval rate for government-backed loans increased slightly from 2012 to 2017 (from 75 percent to 77 percent).

Figure 20: Conventional Home Purchase Loans (2012 versus 2017)



	Carlsbad	Chula Vista	Coronado	Del Mar	El Cajon	Encinitas	Escondido	Imperial Beach	La Mesa	Lemon Grove	National City	Oceanside	Poway	San Diego	San Marcos	Santee	Solana Beach	Vista	Uninc. County
2017	3488	2590	240	197	1448	1529	2335	365	910	507	360	2722	1229	18796	2486	951	255	1967	3127
2012	2862	1983	217	192	744	1380	1314	191	672	322	209	1809	898	14246	1721	436	297	1216	1830

Figure 21: Government-Backed Home Purchase Loans (2012 versus 2017)



	Carlsbad	Chula Vista	Coronado	Del Mar	El Cajon	Encinitas	Escondido	Imperial Beach	La Mesa	Lemon Grove	National City	Oceanside	Poway	San Diego	San Marcos	Santee	Solana Beach	Vista	Uninc. County
2017	349	2320	41	5	724	77	1131	277	371	409	314	1232	194	5098	604	561	7	665	1816
2012	741	2803	30	6	664	184	1062	118	411	437	352	1260	295	6165	752	536	13	803	1477

Note: HMDA reports data based on census tract. To arrive at numbers for the unincorporated County areas, numbers for individual cities are subtracted from the County total. However, this methodology may underestimate the lending activities in the unincorporated areas because census tracts cross jurisdictional boundaries.
Source: www.lendingpatterns.com, 2020

Home Improvement Loans

Reinvestment in the form of home improvement is critical to maintaining the supply of safe and adequate housing. Historically, home improvement loan applications have a higher rate of denial when compared to home purchase loans. Part of the reason is that an applicant's debt-to-income ratio may exceed underwriting guidelines when the first mortgage is considered with consumer credit balances. Another reason is that many lenders use the home improvement category to report both second mortgages and equity-based lines of credit, even if the applicant's intent is to do something other than improve the home (e.g., pay for a wedding or college). Loans that will not be used to improve the home are viewed less favorably since the owner is divesting in the property by withdrawing accumulated wealth. From a lender's point of view, the reduction in owner's equity represents a higher risk.

In 2017, 9,621 applications for home improvement loans were submitted by San Diego County households—higher than the number of applications for this loan type in 2012 (4,205 applications). Generally, the approval rates for home improvement loans were lower than for home purchase loans. The overall approval rate for home improvement loans in both 2012 and 2017 was 60 percent. In 2012, 30 percent of these loans were denied, while 23 percent of these applications were denied in 2017.

Refinancing

Homebuyers will refinance existing home loans for a number of reasons. Refinancing can allow homebuyers to take advantage of better interest rates, consolidate multiple debts into one loan, reduce monthly payments, alter risk (i.e. by switching from variable rate to fixed rate loans), or free up cash and capital.

The majority of loan applications submitted by San Diego County households in 2017 were for home refinancing (74,811 applications). This figure is nearly half the number of refinancing applications submitted in 2012 (155,940 applications). About 58 percent of refinance applications were approved and 18 percent were denied in 2017. These approval rates represent a decrease from 2012, when 71 percent of refinance applications were approved.

C. Lending by Race/Ethnicity and Income

The federal Fair Housing Act prohibits discrimination in mortgage lending based on race, color, national origin, religion, sex, familial status or handicap (disability). It is, therefore, important to look not just at overall approval and denial rates for a jurisdiction, but also whether or not these rates vary by other factors, such as race/ethnicity. (Race/ethnicity is the only personal characteristic available from the HMDA data.)

1. 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 57, 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). Detailed comparisons of the applicant pool with overall demographics by jurisdiction can be found in Appendix B.

Table 57: 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

Race by Income Level

Table 58 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 downpayment, and knowledge of the homebuying process. HMDA data does not provide insight into these other factors.

Table 58: 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.

D. Lending Patterns by Tract Characteristics

1. Income Level

To identify potential geographic differences in mortgage lending activities, an analysis of the HMDA data was conducted by census tract. Based on the Census, HMDA defines the following income levels:[39]

- Low-Income Tract – Tract Median Income less than or equal to 49 percent AMI
- Moderate-Income Tract – Tract Median Income between 50 and 79 percent AMI
- Middle-Income Tract – Tract Median Income between 80 and 119 percent AMI
- Upper-Income Tract – Tract Median Income equal to or greater than 120 percent AMI

The vast majority of census tracts in San Diego County are considered middle or upper income. Only four percent of the County's census tracts are categorized as low income by HMDA. Most loan applications were submitted by residents from one of the County's upper-income tracts. Table 59 summarizes lending outcomes by the income level of the census tract where an applicant resides. In general, home loan approval rates increased and denial rates decreased as the income level of the census tract increased. Higher income households are more likely to qualify for and be approved for loans, so this trend is to be expected.

Table 59: Outcomes Based on Census Tract Income (2012-2017)

Tract Income Level	Total Applicants		Approved		Denied		Other	
	#	%	#	%	#	%	#	%
2012								
Low	9,918	4.9%	5,467	3.8%	3000	10.1%	1451	5.2%
Moderate	24,729	12.2%	16,207	11.2%	4,860	16.4%	3662	13.1%
Middle	41,607	20.6%	29,820	20.6%	6,180	20.9%	5,607	20.0%
Upper	108,335	53.6%	79,670	55.1%	13,642	46.1%	15,023	53.5%
NA	17,649	8.7%	13,447	9.3%	1,884	6.4%	2,318	8.3%
Total	**202,238**	**100.0%**	**144,611**	**100.0%**	**29,566**	**100.0%**	**28,061**	**100.0%**
2017								
Low	5,818	4.3%	2,342	2.7%	1974	9.8%	1502	5.2%
Moderate	14,814	10.9%	7,918	9.1%	3,336	16.5%	3,560	12.3%
Middle	29,765	21.9%	19,060	21.9%	4462	22.1%	6243	21.6%
Upper	77,357	56.9%	52,349	60.3%	9519	47.2%	15,489	53.7%
NA	8,142	6.0%	5,182	6.0%	889	4.4%	2,071	7.2%
Total	**135,896**	**100.0%**	**86,851**	**100.0%**	**20,180**	**100.0%**	**28,865**	**100.0%**

Source: www.lendingpatterns.com, 2020.

[39] These income definitions are different from those used by HUD to determine low and moderate income areas.

Minority Population

HMDA also records lending outcomes by the proportion of minorities residing in a census tract. Much of San Diego County is comprised of census tracts where 20 to 40 percent of residents are minorities. Table 60 summarizes lending outcomes by the proportion of minority residents in a census tract. In general, approval rates steadily increased as the proportion of minority residents decreased.

Table 60: Outcomes by Minority Population of Census Tract (2012-2017)

Tract Minority Level	Total Applicants		Approved		Denied		Other	
	#	%	#	%	#	%	#	%
2012								
0-19% Minority	28,198	13.9%	20,417	72.4%	3,875	13.7%	3,906	13.9%
20-39% Minority	77,893	38.5%	56,702	72.8%	10,602	13.6%	10,589	13.6%
40-59% Minority	50,590	25.0%	36,556	72.3%	7,141	14.1%	6,893	13.6%
60-79% Minority	25,291	12.5%	17,545	69.4%	4,119	16.3%	3,627	14.3%
80-100% Minority	20,189	10.0%	13,378	66.3%	3,797	18.8%	3,014	14.9%
Unknown/NA	77	0.0%	13	16.9%	32	41.6%	32	41.6%
Total	**202,238**	**100.0%**	**144,611**	**71.5%**	**29,566**	14.6%	**28,061**	**13.9%**
2017								
0-19% Minority	12,930	9.5%	8,343	64.5%	1,982	15.3%	2,605	20.1%
20-39% Minority	44,578	32.8%	29,311	65.8%	6,170	13.8%	9,097	20.4%
40-59% Minority	35,988	26.5%	23,438	65.1%	5,044	14.0%	7,506	20.9%
60-79% Minority	21,213	15.6%	13,206	62.3%	3,334	15.7%	4,673	22.0%
80-100% Minority	20,591	15.2%	12,236	59.4%	3,598	17.5%	4,757	23.1%
Unknown/NA	596	0.4%	317	53.2%	52	8.7%	227	38.1%
Total	**135,896**	**100.0%**	**86,851**	**63.9%**	**20,180**	**14.8%**	**28,865**	**21.2%**

Note: NA=Minority tract percentage data was not available.
Source: www.lendingpatterns.com, 2020.

E. Major Lenders

1. General Overview

Table 61 identifies the top ten lenders in San Diego County in 2017. As shown, these top lenders were similarly active throughout most jurisdictions. In 2017, about 38 percent (39,017 applications) of all loan applications in San Diego County were submitted to one of the County's top ten lenders. The region's top two lenders have remained fairly consistent since 2012 (Table 61). The region's remaining top lenders are all smaller financial institutions that each accounted for less than four percent of the County's market share.

Table 61: Top San Diego County Lenders by City (2017)

Jurisdiction	Top 10 Lenders									
	Wells Fargo Bank, NA	JP Morgan Chase Bank, NA	Navy Federal Credit Union	Quicken Loans, Inc.	Caliber Home Loans, Inc.	Loan depot.com	Bank of America, NA	Shore Mortgage	Nationstar Mortgage	U.S. Bank National Assoc.
Carlsbad	✓	✓		✓	✓		✓	✓	✓	✓
Chula Vista	✓	✓	✓	✓	✓	✓		✓	✓	
Coronado	✓	✓	✓	✓		✓	✓			✓
Del Mar	✓	✓		✓	✓		✓		✓	✓
El Cajon	✓	✓	✓	✓	✓	✓		✓	✓	
Encinitas	✓	✓		✓	✓		✓	✓	✓	✓
Escondido	✓	✓	✓	✓	✓	✓		✓	✓	
Imperial Bch.	✓	✓	✓	✓	✓	✓			✓	✓
La Mesa	✓	✓	✓	✓	✓	✓		✓	✓	
Lemon Grove	✓	✓	✓	✓		✓		✓	✓	
National City	✓	✓	✓	✓		✓		✓	✓	
Oceanside	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Poway	✓	✓	✓	✓	✓	✓	✓	✓		✓
San Diego	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
San Marcos	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Santee	✓	✓	✓	✓	✓	✓		✓	✓	
Solana Beach	✓	✓		✓	✓		✓	✓	✓	✓
Vista	✓	✓	✓	✓	✓	✓	✓	✓	✓	

Notes:
1. Comparison only indicates if a top County lender was also a top lender in a city, and does not compare the specific order of top lenders in the County as a whole.
2. Data for just the unincorporated areas is not available

Source: www.lendingpatterns.com, 2020.

F. Sub-Prime Lending Market

According to the Federal Reserve, "prime" mortgages are offered to persons with excellent credit and employment history and income adequate to support the loan amount. "Subprime" loans are loans to borrowers who have less-than-perfect credit history, poor employment history, or other factors such as limited income. By providing loans to those who do not meet the critical standards for borrowers in the prime market, subprime lending can and does serve a critical role in increasing levels of homeownership. Households that are interested in buying a home but have blemishes in their credit record, insufficient credit history, or non-traditional income sources may be otherwise unable to purchase a home. The subprime loan market offers these borrowers opportunities to obtain loans that they would be unable to realize in the prime loan market.

Subprime lenders generally offer interest rates that are higher than those in the prime market and often lack the regulatory oversight required for prime lenders because they are not owned by regulated

financial institutions. In the recent past, however, many large and well-known banks became involved in the subprime market either through acquisitions of other firms or by initiating subprime loans directly. Though the subprime market usually follows the same guiding principles as the prime market, a number of specific risk factors are associated with this market.

Subprime lending can both impede and extend fair housing choice. On the one hand, subprime loans extend credit to borrowers who potentially could not otherwise finance housing. The increased access to credit by previously underserved consumers and communities contributed to record high levels of homeownership among minorities and lower income groups. On the other hand, these loans left many lower income and minority borrowers exposed to default and foreclosure risk. Since foreclosures destabilize neighborhoods and subprime borrowers are often from lower income and minority areas, mounting evidence suggests that classes protected by fair housing faced the brunt of the recent subprime and mortgage lending market collapse.[40]

While HMDA data does not classify loans as subprime, it does track the interest rate spread on loans. Since 2005, the Federal Reserve Board has required lenders to report rate spreads for loans whose APR was above the Treasury benchmark. Loans with a reported spread are typically referred to as higher-priced or subprime loans.

Table 62: Reported Spread on Loans by Race/Ethnicity (2012-2017)

San Diego County	Frequency of Spread		Average Spread	
	2012	2017	2012	2017
White	1.0%	0.0%	3.10	0.00
Black	1.3%	3.6%	2.67	2.66
Hispanic	1.6%	4.9%	3.41	2.87
Asian	0.5%	1.7%	2.82	2.85
Total	**1.0%**	**3.6%**	**3.10**	**2.86**

Source: www.lendingpatterns.com, 2020.

As shown in Table 62, the frequency of subprime loans issued has increased over time. In 2012, approximately one percent of all loans issued had a reported spread but, by 2017, almost four percent of loans issued were subprime loans. What appears to be most troubling, however, is that Black and Hispanic applicants seem to be significantly more likely to receive these higher-priced loans. In 2012 and 2017, Blacks and Hispanics were twice as likely as Asians to receive a subprime loan. White applicants utilizing subprime loans were limited.

Since 2012, there has been a decrease in the magnitude of spread reported on these loans. Generally, the higher the reported spread on a loan, the worse that loan is compared to a standard prime loan. In 2012, the average reported spread for a subprime loan was just above three points; by 2017, the average reported spread had dropped to below three points. The most significant change in the reported magnitude of spread for subprime loans by race/ethnicity of the applicant was noted for White applicants.

[40] Association of Community Organizations for Reform Now. September 2007. "Foreclosure Exposure: A Study of Racial and Income Disparities in Home Mortgage Lending in 172 American Cities."

CHAPTER 5

PUBLIC POLICIES

AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Public policies established at the regional and local levels can affect housing development, and therefore, may impact the range and location of housing choices available to residents. Fair housing laws are designed to encourage an inclusive living environment, active community participation, and an assessment of public policies. An assessment of public policies and practices can help determine potential impediments to fair housing opportunity. This section presents an overview of government regulations, policies, and practices enacted by each of the 19 jurisdictions in San Diego County that may impact fair housing choice.

A. Policies and Programs Affecting Housing Development

The General Plan of a jurisdiction establishes a vision for the community and provides long-range goals and policies to guide the development in achieving that vision. Two of the eight State-mandated General Plan elements – Housing and Land Use Elements – have direct impact on the local housing market in terms of the amount and range of housing choice. The Environmental Justice Element The zoning ordinance, which implements the General Plan, is another important document that influences the amount and type of housing available in a community – the availability of housing choice. In addition, 11 jurisdictions (Carlsbad, Chula Vista, Coronado, Del Mar, Encinitas, Imperial Beach, National City, Oceanside, Solana Beach, City of San Diego, and unincorporated areas of San Diego County) have Local Coastal Plans that also play a significant role in affordable housing in the Coastal Zone of each jurisdiction.

1. Housing Element Law and Compliance

As one of the eight State-mandated elements of the local General Plan, the Housing Element is the only element with specific statutory requirements and is subject to review by the California Department of Housing and Community Development (HCD) for compliance with State law. Enacted in 1969, Housing Element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law acknowledges that for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for and do not unduly constrain housing development. Specifically, the Housing Element must:

- Identify adequate sites which will be made available through appropriate zoning and development standards, with services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the community's housing goals;

- Assist in the development of adequate housing to meet the needs of extremely low, very low, low, and moderate income households;[41]
- Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities;
- Conserve and improve the condition of the existing affordable housing stock; and,
- Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act, or any other state and federal fair housing laws.

Specifically in 2017, the State passed AB 686, requiring the next Housing Element update to include an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions to affirmatively furthering fair housing.

Compliance Status

Table 63 summarizes the Housing Element compliance status of jurisdictions in San Diego County. A Housing Element found by HCD to be in compliance with State law is presumed to have adequately addressed its policy constraints. According to HCD, all 19 Housing Elements for participating jurisdictions (including the County) for the fifth cycle (2013-2020 are in compliance.

A number of jurisdictions have begun updating the Housing Element for the sixth cycle (2021-2029). As part of the 2021-2029 update, each jurisdiction must demonstrate that it has capacity to meet its housing needs, as determined by SANDAG and HCD. Each jurisdiction is allocated its share of housing during the Regional Housing Needs Assessment (RHNA) process, which identifies the number of housing units each jurisdiction must accommodate by providing adequate sites. As of February 2020, the cities of Coronado, Imperial Beach, Lemon Grove, and Solana Beach had requested reductions in the number of housing units they must accommodate under the RHNA allocation for the 2021-2029 Housing Element cycle.

[41] Under the State Housing Element law, the income categories are: extremely low income (30 percent AMI); very low income (50 percent AMI); low income (80 percent AMI); moderate income (120 percent AMI); and above moderate income (greater than 120 percent AMI).

Table 63: Housing Element Status for 2013-2021 Cycle

Jurisdiction	Document Status	Compliance Status
Carlsbad	Adopted	In
Chula Vista	Adopted	In
Coronado	Adopted	In
Del Mar	Adopted	In
El Cajon	Adopted	In
Encinitas	Adopted	In
Escondido	Adopted	In
Imperial Beach	Adopted	In
La Mesa	Adopted	In
Lemon Grove	Adopted	In
National City	Adopted	In
Oceanside	Adopted	In
Poway	Adopted	In
San Diego (City)	Adopted	In
San Diego (County)	Adopted	In
San Marcos	Adopted	In
Santee	Adopted	In
Solana Beach	Adopted	In
Vista	Adopted	In

Source: Department of Housing and Community Development, State of California, April 2020.

2. San Diego Forward: Regional Plan

SANDAG adopted San Diego Forward: Regional Plan in 2015. Updated periodically, the Regional Plan serves as the long-term planning framework for the San Diego region. It provides a broad context in which local and regional decisions can be made that move the region toward a sustainable future – a future with more choices and opportunities for all residents of the region. The Regional Plan better integrates San Diego's local land use and transportation decisions and focuses attention on where and how the region wants to grow. The Regional Plan contains an incentive-based approach to encourage and channel growth into existing and future urban areas and smart growth communities. SANDAG is in the process of updating the Regional Plan with adoption anticipated in 2021.

3. Land Use Element

The Land Use Element of a General Plan designates the general distribution, location, and extent of uses for land planned for housing, business, industry, open space, and public or community facilities. As it applies to housing, the Land Use Element establishes a range of residential land use categories, specifies densities (typically expressed as dwelling units per acre [du/ac]), and suggests the types of housing appropriate in a community. Residential development is implemented through the zoning districts and development standards specified in the jurisdiction's zoning ordinance.

4. Residential Densities

Many factors, governmental and non-governmental, affect the supply and cost of housing in a local housing market. The governmental factor that most directly influences these market conditions is the allowable density range of residentially designated land. In general, higher densities allow developers to take advantage of economies of scale, reduce the per-unit cost of land and improvements, and reduce developments costs associated with new housing construction. Reasonable density standards ensure the opportunity for higher-density residential uses to be developed within a community, increasing the feasibility of producing affordable housing, and offer a variety of housing options that meet the needs of the community. Minimum required densities in multi-family zones ensure that land zoned for multi-family use, the supply of which is often limited, will be developed as efficiently as possible for multi-family uses.

Table 64 presents a summary of allowable densities by land use type for jurisdictions in the San Diego region. While most jurisdictions have Land Use Elements that allow a range of single-family (0-14 du/ac) and multi-family (6-30+ du/ac) residential uses, Del Mar and Poway due to the characteristics of existing residential neighborhoods, do not accommodate multi-family uses at a density greater than 20 du/ac without a density bonus or other incentive for affordable housing.

As a part of its 2013-2021 Housing Element, the City of Del Mar committed to redesignating two vacant properties in the North Commercial (NC) zone to allow residential development at a density of 20 units per acre or greater. In addition to the land use re-designation noted above, the City of Del Mar also plans to pursue amendments to the North Commercial (NC) and Professional Commercial (PC) zones expanding the list of uses allowed by right to include residential uses at a density of 20 units per acre for projects that include an affordable housing component. The City has prepared an Environmental Impact Report (EIR) to address the proposed re-designation, and the City Council will consider the amendments after the public review period closes in February 2020.

To provide adequate sites for affordable housing development, an Affordable Housing Overlay Zone (AHOZ) was established in the Poway Zoning Code for Low Income (AH-L) and Moderate Income (AH-M) households. In 2012, placement of an AHOZ designation was completed on six publicly-owned sites. An AHOZ may be applied to property within any land use category, including non-residential categories, not including the Open Space or Rural Residential categories. The Poway Municipal Code (PMC) was also amended in 2012 to provide development incentives on AHOZ sites to encourage affordable housing that is consistent with State law. Development incentives include allowing densities up to 30 dwelling units per acre on properties that have the AHOZ applied on them.

All jurisdictions have very low or no minimum density requirements in their General Plan Land Use Elements for at least some of their residentially-zoned land. State law requires a local government to make a finding that a density reduction, rezoning, or downzoning is consistent with its Housing Element prior to requiring or permitting a reduction of density of a parcel below the density used in determining Housing Element compliance. The legislation also allowed courts to award attorneys' fees and costs if the court determines that the density reduction or downzoning was made illegally.

Table 64: Typical Land Use Categories and Permitted Density by Jurisdiction

Generalized Land Use (By Density)	Density Range (du/ac)	Typical Residential Type	Carlsbad	Chula Vista	Coronado	Del Mar	El Cajon	Encinitas
Single-family								
Estate/Rural	<1 unit per acre	Very low-density housing where agricultural is predominant	■	■	■	■	■	■
Very Low	0-1	Single-family homes on large lots in rural areas	■	■	■	■	■	■
Low	1-3	Single-family homes on large lots	■	■	■	■	■	■
Medium	3-6	Single-family homes on medium-sized lots	■	■	■	■	■	■
High	6-14	Smaller single-family homes	■	■	■	■	■	■
Multi-Family								
Low	6-15	Town homes, duplexes, condominiums, and small single-story apartments	■	■	■	■	■	■
Medium	15-20	One and two-story apartment complexes	■	■	■		■	■
High	20-30	Two and three-story apartment complexes	■	■	■		■	■
Very High	30-50	Large multi-story apartment and condo complexes	■	■	■		■	
Special High	50+	High-rise apartment and condo complexes		■				

Source: General Plan Land Use Elements for jurisdictions in San Diego County (February 2020).
Note: This table represents a summary of typical land use categories, as defined by density. These categories are not necessarily representative of a specific jurisdiction's General Plan Land Use categories. Instead, they are meant to provide an overview of the type of land uses and densities permitted in that jurisdiction. The squares identify a jurisdiction as supporting land use densities within the identified range (according to the General Plan's Land Use Element). However, a jurisdiction's land use category might not include all the densities listed in that range. For example, a jurisdiction's Multi-Family Very High density category might support densities from 21 to 35 du/ac, but the High and Very High categories have been marked with a square since the range covers both categories.

Table 64: Typical Land Use Categories and Permitted Density by Jurisdiction

Generalized Land Use (By Density)	Density Range (du/ac)	Typical Residential Type	Escon-dido	Imperial Beach	La Mesa	Lemon Grove	National City	Ocean-side
Single-family								
Estate/Rural	<1 unit per acre	Very low-density housing where agricultural is predominant	■	■	■	■	■	■
Very Low	0-1	Single-family homes on large lots in rural areas	■	■	■	■	■	■
Low	1-3	Single-family homes on large lots	■	■	■	■	■	■
Medium	3-6	Single-family homes on medium-sized lots	■	■	■	■	■	■
High	6-14	Smaller single-family homes	■	■	■	■	■	
Multi-Family								
Low	6-15	Town homes, duplexes, condominiums, and small single-story apartments	■	■	■	■	■	■
Medium	15-20	One and two-story apartment complexes	■	■	■	■	■	■
High	20-30	Two and three-story apartment complexes	■	■	■	■	■	■
Very High	30-50	Large multi-story apartment and condo complexes	■	■	■	■	■	■
Special High	50+	High-rise apartment and condo complexes	■				■	

Source: General Plan Land Use Elements for jurisdictions in San Diego County (February 2020).
Note: This table represents a summary of typical land use categories, as defined by density. These categories are not necessarily representative of a specific jurisdiction's General Plan Land Use categories. Instead, they are meant to provide an overview of the type of land uses and densities permitted in that jurisdiction. The squares identify a jurisdiction as supporting land use densities within the identified range (according to the General Plan's Land Use Element). However, a jurisdiction's land use category might not include all the densities listed in that range. For example, a jurisdiction's Multi-Family Very High density category might support densities from 21 to 35 du/ac, but the High and Very High categories have been marked with a square since the range covers both categories.

Table 64: Typical Land Use Categories and Permitted Density by Jurisdiction

Generalized Land Use (By Density)	Density Range (du/ac)	Typical Residential Type	Poway*	San Diego (City)*	San Diego (County)*	San Marcos	Santee	Solana Beach	Vista
Single-family									
Estate/Rural	<1 unit per acre	Very low-density housing where agricultural is predominant	■	■	■	■	■	■	■
Very Low	0-1	Single-family homes on large lots in rural areas	■	■	■	■	■	■	■
Low	1-3	Single-family homes on large lots	■	■	■	■	■	■	■
Medium	3-6	Single-family homes on medium-sized lots	■	■	■	■	■	■	■
High	6-14	Smaller single-family homes	■	■	■	■	■	■	■
Multi-Family									
Low	6-15	Town homes, duplexes, condominiums, and small single-story apartments	■	■	■	■	■	■	■
Medium	15-20	One and two-story apartment complexes	■	■	■	■	■	■	■
High	20-30	Two and three-story apartment complexes		■	■	■	■	■	■
Very High	30-50	Large multi-story apartment and condo complexes		■	■	■	■		■
Special High	50+	High-rise apartment and condo complexes		■					

Source: General Plan Land Use Elements for jurisdictions in San Diego County (February 2020).
Note: This table represents a summary of typical land use categories, as defined by density. These categories are not necessarily representative of a specific jurisdiction's General Plan Land Use categories. Instead, they are meant to provide an overview of the type of land uses and densities permitted in that jurisdiction. The squares identify a jurisdiction as supporting land use densities within the identified range (according to the General Plan's Land Use Element). However, a jurisdiction's land use category might not include all the densities listed in that range. For example, a jurisdiction's Multi-Family Very High density category might support densities from 21 to 35 du/ac, but the High and Very High categories have been marked with a square since the range covers both categories.

*Indicates jurisdiction with very low, or no minimum density standards in land use or zoning ordinance.

B. Zoning Ordinance

The zoning ordinance implements the General Plan by establishing zoning districts that correspond with General Plan land use designations. Development standards and permitted uses in each zoning district are specified to govern the density, type, and design of different land uses for the protection of public health, safety, and welfare (Government Code, Sections 65800-65863). The Fair Housing Act does not pre-empt local zoning laws. However, the Act applies to municipalities and other local government entities and prohibits them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons, including individuals with disabilities. Another way that discrimination in zoning and land use may occur is when a seemingly neutral ordinance has a disparate impact, or causes disproportional harm, to a protected group. Land use policies such as density or design requirements that make residential development prohibitively expensive, limitations on multi-family housing, or a household occupancy standard may be considered discriminatory if it can be proven these policies have a disproportionate impact on minorities, families with children, or people with disabilities.

Several aspects of the zoning ordinance that may affect a person's access to housing or limit the range of housing choices available are described below. As part of the Housing Element update, jurisdictions are required to evaluate their land use policies, zoning provisions, and development regulations and make proactive efforts to mitigate any constraints identified. However, the following review is based on the current zoning ordinances as of the writing of this AI.

1. Definition of Family

A community's zoning ordinance can potentially restrict access to housing for households failing to qualify as a "family" by the definition specified in the zoning ordinance. For instance, a landlord may refuse to rent to a "nontraditional" family based on the zoning definition of a family.[42] A landlord may also use the definition of a family as an excuse for refusing to rent to a household based on other hidden reasons, such as household size. Even if the code provides a broad definition, deciding what constitutes a "family" should be avoided by jurisdictions to prevent confusion or give the impression of restrictiveness.

California court cases[43] have ruled that a definition of "family" that: 1) limits the number of persons in a family; 2) specifies how members of the family are related (i.e. by blood, marriage or adoption, etc.), or (3) defines a group of not more than a certain number of unrelated persons as a single housekeeping unit is invalid. Court rulings stated that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the jurisdiction, and therefore violates rights of privacy under the California Constitution. A zoning ordinance also cannot regulate residency by discriminating between biologically related and unrelated persons. Furthermore, a zoning provision cannot regulate or enforce the number of persons constituting a family.

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42 Most Zoning Ordinances that define families limit the definition to two or more individuals related by kinship, marriage, adoption, or other legally recognized custodial relationship.

43 City of Santa Barbara v. Adamson (1980), City of Chula Vista v. Pagard (1981), among others.

The cities of Carlsbad (2011), Del Mar (2014), National City (2011) and San Marcos (2012) amended or removed the definition of "family" from their zoning ordinances. As of February 2020, only the City of Solana Beach includes a definition of "family" in its zoning ordinance that constitutes a potential impediment to fair housing choice. The City defines "family" as "Two or more persons living together as a bona fide single housekeeping unit. This definition of a family excludes individuals. Such a definition can be considered an impediment because it may give landlords the opportunity to deny renting single-family or multi-family dwelling units to single persons.

2. Density Bonus Ordinance

California Government Code Section 65915 includes requirements for local governments to provide density bonuses and incentives for housing developers that agree to develop affordable housing units. Density bonus requirements are regularly updated at the state level and must then be adopted by local jurisdictions to comply with state law. The most recent changes to California density bonus law went into effect in January 2020. Because of this, while most San Diego County jurisdictions have density bonus provisions in their zoning ordinances, all cities and the County of San Diego must review their regulations to ensure they continue to remain in compliance with state law.

3. Parking Requirements

Communities that require an especially high number of parking spaces per dwelling unit can negatively impact the feasibility of producing affordable housing by reducing the achievable number of dwelling units per acre, increasing development costs, and thus restricting the range of housing types constructed in a community. Typically, the concern for high parking requirements is limited to multi-family, affordable, or senior housing. The basic parking standards for jurisdictions in San Diego County are presented in Table 65. Many jurisdictions offer reductions in parking requirements in conjunction with density bonuses for affordable and senior housing.

Most jurisdictions in the county have comparable parking requirements. However, Coronado, Imperial Beach, La Mesa, and Lemon Grove have parking standards for multi-family uses that do not distinguish between parking required for smaller units (one or two bedrooms) and larger units (three or more bedrooms). Because smaller multi-family units are often the most suitable type of housing for seniors and persons with disabilities, requiring the same number parking spaces as larger multi-family units can be a constraint on the construction of units intended to serve these populations. Several of these cities, however, do offer reduced parking standards for housing projects serving specific populations, such as senior housing or affordable housing projects.

Table 65: Off-Street Parking Requirements

Jurisdictions	SF	MF					ADU
		1br	2br	3br	4+br	Guest Space	
Carlsbad	2	1.5[1]	2	2	2	0.25 to 0.3[2]	--[3]
Chula Vista	2[4]	1.5	2	2	2	--	1
Coronado[5]	2[6]	2	2	2	2	--	--[3]--
Del Mar	2[7]	1	2	2	3	0.25	1
El Cajon	2	1.5	2	2	2	0.25[8]	1
Encinitas	2 to 3[9]	2	2	2.5	2.5	0.25	1
Escondido	2	1.5	1.75	2	2	0.25	1
Imperial Beach[10]	2	1.5-2	1.5-2	1.5-2	1.5-2	--	2
La Mesa	2[11]	2	2	2	2	4/10	--
Lemon Grove	2	2	2	2	2	0.25	1
National City	2[12]	1.3	1.5	1.5	1.5	0.5[13]	1
Oceanside	2[14]	1.5	2	2	2	0.1 to 0.25[15]	--
Poway	2	1.5 to 1.75	2.25	2.75 to 3	2.75 to 3	--	1
San Diego City [16]	2	1.0 to 1.75	1.75 to 2.25	2.0 to 2.5	2.0 to 2.5	--[17]	1
San Diego County	2	1.5	1.5	2	2	0.2	1
San Marcos	2[18]	1.5	2	2	2	0.33	1
Santee	2	1.5	2	2	2	0.25	--
Solana Beach	2	1.5	2	2	2	0.25	1
Vista	2[19]	2	2	2.5	2.5	0.33[20]	1

*Notes: ADU=accessory dwelling unit; bdrm = bedroom

1. Within the Village outside the Coastal Zone, parking required is 1.0 space per studio or one- bdrm unit and 1.5 spaces per unit with two or more bdrms.
2. For projects up to 10 units, required guest parking is 0.3 spaces per unit; 0.25 spaces per unit for projects larger than 10 units.
3. Parking for the primary unit also serves the ADU.
4. 1.0 additional space required for each bdrm over four bdrms.
5. For multiple-family dwellings in the R-5 Zone and affordable housing, 1.5 spaces per dwelling unit are required. For senior housing, 1.0 parking space is required for each dwelling unit.
6. For houses over 5,000 sf, 1.0 additional uncovered space is required.
7. For single-family dwellings with three or more bedrooms, 1.0 additional on-site parking space is required, including 2.0 garage parking spaces.
8. 1.0 visitor space per unit is required in the RM-6000 zone.
9. 3.0 spaces required for dwelling units in excess of 2,500 square feet.
10. Residential units in the R-1-6000, R-1-3800, R-1500, R-2000, R-3000, and R-3000-D zones require 2.0 spaces per unit (including ADUs, where allowed); and residential dwelling units in the C-1, C-2, C-3, MU-1 and MU-2 zones require 1.5 spaces per unit.
11. 5.0 spaces required on lots with long driveways and panhandle/easement access lots.
12. 3.0 spaces required per dwelling unit for units with more than 2,500 square feet in floor area, plus 1.0 space per bdrm proposed over four bdrms.
13. Additional 0.25 spaces for each unit over 20.
14. For inland and downtown D Districts, 3.0 spaces are required for houses over 2,500 sf.
15. For multifamily projects with four to 10 units,1.0 space per unit is required. For projects with more than 10 units, 1.0 space per unit plus 20 percent of the total number of units is required.
16. 1.0 space per bdrm required for single dwellings with five or more bdrms in campus impact areas. 1.0 space per bdrm, less 1.0 space also required per occupant age 18 and over in high occupancy single dwellings. Lower range of multi-family requirement is for units in transit areas or lower income units. Higher range of multi-family requirement is for units in parking impact areas.
17. Guest spaces are required at a rate of 15-20 percent of total units with Planned Development Permits in specified communities.
18. Dwellings over 3,000 sf required three spaces.
19. Plus 2.0 - 2.5 guest spaces in semi-rural subdivisions.
20. For units with two or more bdrms, 0.5 guest space per unit is required.

4. Short-Term Rentals

The rising popularity of home-sharing websites such as Airbnb and HomeAway in recent years has led to significant increases in homes being offered on a short-term basis to generate rental income. Homes may be offered as "home-shares," where the primary resident offers one or more rooms to visitors while remaining on site, or whole homes may be rented on a daily or weekly basis. Short-term rentals are particularly popular in coastal locations, which have a robust demand for tourist accommodations. While the impact of short-term rentals on housing availability and affordability is still being evaluated, there is evidence that short-term rentals have a negative effect on housing affordability by changing the way residential properties are used and reducing housing availability for local residents.

San Diego jurisdictions vary in their approach to short-term rentals. The cities of Carlsbad, Chula Vista, Del Mar, Encinitas, Imperial Beach, Oceanside, and Solana Beach explicitly allow short-term rentals in at least some zones. With the exception of Imperial Beach, these cities require permits for short-term rentals, and specify that short-term rentals must meet various performance standards to be allowed to operate. The City of Lemon Grove does not allow entire homes to be used as short-term rentals but does permit home-sharing with a permit.

Other jurisdictions, including the cities of El Cajon, Escondido, La Mesa, National City, Poway, San Marcos, Santee, and Vista, and the County of San Diego, do not explicitly address short-term rentals in their adopted regulations; however, the County of San Diego requires short-term rentals to pay transient occupancy taxes. The Santee City Council considered developing regulations for short-term rentals at an April 2019 meeting, but determined that due to the low number of rentals in Santee and lack of complaints to date about their operations, additional regulations were not necessary at the time.

As of February 2020, there was no consensus on the status or appropriate manner of regulating short-term rentals in the City of San Diego. While the most recent (2017) City Attorney opinion on short-term rentals notes that they are prohibited in single-family residential zones as a "commercial use" and not specifically defined or expressly permitted in any other zone. In response to the City Attorney's opinion, the San Diego City Council adopted an ordinance allowing short-term rentals with permits in some zones, but rescinded the new regulations in October 2018. While the City Council has expressed a desire to adopt clear regulations for short-term rentals, as of the writing of this report there have been no new regulations put in place and short-term rentals in the City of San Diego continue to operate in a legal grey area.

The City of Coronado prohibits "transient rentals," including short-term rentals, in residential zones.

C. Variety of Housing Opportunity

To ensure fair housing choice in a community, a zoning ordinance should provide for a range of housing types, including single-family, multi-family, second dwelling units, mobile homes, licensed community care facilities, employee housing for seasonable or migrant workers as necessary, assisted living facilities, emergency shelters, supportive housing, transitional housing, and single room occupancy (SRO) units. Table 66 provides a summary of each jurisdiction's zoning ordinance as it relates to ensuring a variety of housing opportunities.

1. Single- and Multi-Family Uses

Single- and multi-family housing types include detached and attached single-family homes, duplexes or half-plexes, townhomes, condominiums, and rental apartments. Zoning ordinances should specify the zones in which each of these uses would be permitted by right. All of the jurisdictions in San Diego County accommodate the range of residential uses described above without a use permit, although the City of Imperial Beach does require a site plan review by the Planning Commission for developments with five or more units.

Zoning ordinances should also avoid "pyramid or cumulative zoning" (e.g. permitting lower-density single-family uses in zones intended for higher density multi-family uses). Pyramid or cumulative zoning schemes could limit the amount of lower-cost multi-family residential uses in a community and be a potential impediment to fair housing choice. Most jurisdictions in the San Diego region have some form of pyramid zoning and permitting single-family residential uses in multi-family zones is the most prevalent example. The cities of Coronado, Lemon Grove, Oceanside, Poway, San Marcos, and Santee prohibit single-family residential uses in higher-density, multi-family zones.

Allowing or requiring a lower density use in a zone that can accommodate higher density uses is regulated by State law (SB 2292, also known as the Dutra Bill). A local government is required to make a finding that an action that results in a density reduction, rezoning, or downzoning is consistent with its Housing Element, particularly in relation to the jurisdiction's ability to accommodate its share of regional housing needs.

2. Accessory Dwelling Units

Accessory dwelling units (ADUs), also called second dwelling units or granny flats, are attached or detached dwelling units that provide complete independent living facilities for one or more persons, including permanent provisions for living, sleeping, cooking and sanitation. Accessory dwelling units may be an alternative source of affordable housing for lower income households and seniors. These units typically rent for less than apartments of comparable size.

California law requires local jurisdictions to adopt ordinances that establish the conditions under which ADUs are permitted (Government Code, Section 65852.2). A jurisdiction cannot adopt an ordinance that totally precludes the development of ADUs unless the ordinance contains findings acknowledging that allowing second units may limit housing opportunities of the region and result in adverse impacts on public health, safety, and welfare. An amendment to the State's ADU law in 2003 requires local governments to use a ministerial, rather than discretionary, process for approving ADUs

(i.e. ADUs otherwise compliant with local zoning standards can be approved without a public hearing) and allows jurisdictions to count second units towards meeting their regional housing needs goals. A ministerial process is intended to reduce permit processing time frames and development costs because proposed ADUs that are in compliance with local zoning standards can be approved without a public hearing. All jurisdictions in the county currently permit second dwelling units via a variety of review processes such as a zoning clearance or an administrative permit in at least some zones.

Imperial Beach is the only jurisdiction with adopted findings allowing it to preclude second units. Second units are allowed by-right within the City's R-3000, R-2000, and R-1500 residential zones. However, the City Council determined that allowing second units in R1-6,000 and R1-3,800 zones is not in the best interest of public health, safety, and welfare and adopted findings to preclude second units in those zones.

3. Mobile Home Parks

Provisions for mobile home parks vary among the San Diego County jurisdictions. Some jurisdictions have designated mobile home park zones specifically to provide for this type of housing (Carlsbad, Chula Vista, La Mesa, National City, Oceanside, Poway, San Marcos, and Vista). The City of Encinitas provides for mobile home parks in its Mobile Home Park zone, and in higher density zones upon issuance of a Conditional Use Permit, while the City of San Diego has a mobile home park overlay zone to preserve existing sites. Other jurisdictions allow mobile home parks in some residential zones with a Conditional Use Permit or Site Development Permit (Escondido, Imperial Beach, City of San Diego, Poway, San Diego County, Santee, and Solana Beach). El Cajon, Santee and Vista have Mobile Home Park Overlay Zones that permit new mobile home parks and the expansion of current parks with a CUP or Site Development Plan. Coronado, Del Mar, and Lemon Grove have no provisions for mobile home parks in their Zoning Ordinances.

Table 66: Variety of Housing Opportunity

Housing Type	Carlsbad	Chula Vista	Coronado	Del Mar	El Cajon	Encinitas
Single-family	P	P	P	P	P	P
Multi-family	P	P	P	P	P	P
Second Dwelling Units	P	P	P	P	P	P
Mobile Home Parks	P	P			P	P
Manufactured Housing	P	P	P	P	P	P
Residential Care Facilities (≤6 persons)	P	P	P	P	P	P
Residential Care Facilities (≥6 persons)	C	C	C	C	C	C
Emergency Shelters	P[5]	P	P	P	P	C
Transitional Housing	P	P	P	P	P	P
Supportive Housing	P	P	P	P	P	P
SRO	C[3]	P	C		P	P
Farmworker/ Employee Housing	P/C[6]	C			P	P

Notes: P – permitted by right; C – Conditionally permitted. ___ - Potential impediments.

1. Permitted but with a potential impediment.
2. Second units are allowed by-right within the City's R-3000, R-2000, and R-1500 residential zones. However, they are prohibited in the R1-6,000 and R1-3,800 zones.
3. Referred to as "managed living units."
4. Referred to as "transient lodging."
5. Emergency shelters with no more than 30 beds or persons is allowed by right in the M and P-M zones and are conditionally allowed with more than 30 beds or persons in the same zones.
6. "Large farmworker housing complexes" are conditionally permitted: otherwise farmworker housing is permitted by right.
7. Similarly permitted as similar uses in the same zone.

Table 66: Variety of Housing Opportunity

Housing Type	Escondido	Imperial Beach	La Mesa	Lemon Grove	National City	Oceanside
Single-family	P	P	P	P	P	P
Multi-family	P	P[1]	P	P	P	P
Second Dwelling Units	P	P[2]	P	P	P	P
Mobile Home Parks	C	C	C		C	P
Manufactured Housing	P	P	P	P	P	P
Residential Care Facilities (≤6 persons)	P	P	P	P	P	P
Residential Care Facilities (≥6 persons)	C	C	C	C	C	C
Emergency Shelters	P	P	P	P	P	P
Transitional Housing	P	P		P	P	P
Supportive Housing	P	P		P	P	
SRO	C[4]	C		C	P	P[1]
Farmworker/ Employee Housing	P[1]	P				P

Notes: P – permitted by right; C – Conditionally permitted. ___ - Potential impediments.

1. Permitted but with a potential impediment.
2. Second units are allowed by-right within the City's R-3000, R-2000, and R-1500 residential zones. However, they are prohibited in the R1-6,000 and R1-3,800 zones.
3. Referred to as "managed living units."
4. Referred to as "transient lodging."
5. Emergency shelters with no more than 30 beds or persons is allowed by right in the M and P-M zones and are conditionally allowed with more than 30 beds or persons in the same zones.
6. "Large farmworker housing complexes" are conditionally permitted: otherwise farmworker housing is permitted by right.
7. Similarly permitted as similar uses in the same zone.

Table 66: Variety of Housing Opportunity

Housing Type	Poway	San Diego City	San Diego County	San Marcos	Santee	Solana Beach	Vista
Single-family	P	P	P	P	P	P	P
Multi-family	P	P	P	P	P	P	P
Accessory Dwelling Units	P	P	P	P	P	P	P
Mobile Home Parks	C	C	C	P	C	P	P
Manufactured Housing	P	P	P	P	P	P	P
Residential Care Facilities (≤6 persons)	P	P	P	P	P	P	P
Residential Care Facilities (≥6 persons)	C[1]	C	P/C	C	C	C	C
Emergency Shelters		P	P	P	P	P	P
Transitional Housing	P	P	P/C[1]	P	P	P	P[1]
Supportive Housing	P	P	P/C[1]	P	P	P	P
SRO	C[3]	P	P/C	C	C	C	P
Farmworker/ Employee Housing	P	P[1]/C	P[1]	C	P		P

Notes: P – permitted by right; C – Conditionally permitted. ___ - Potential impediments.

1. Permitted but with a potential impediment.
2. Second units are allowed by-right within the City's R-3000, R-2000, and R-1500 residential zones. However, they are prohibited in the R1-6,000 and R1-3,800 zones.
3. Referred to as "managed living units."
4. Referred to as "transient lodging."
5. Emergency shelters with no more than 30 beds or persons is allowed by right in the M and P-M zones and are conditionally allowed with more than 30 beds or persons in the same zones.
6. "Large farmworker housing complexes" are conditionally permitted: otherwise farmworker housing is permitted by right.
7. Similarly permitted as similar uses in the same zone.

4. Manufactured Housing

State law requires local governments to permit manufactured or mobile homes meeting federal safety and construction standards on a permanent foundation in all single-family residential zoning districts (Section 65852.3 of the California Government Code). All jurisdictions in San Diego County comply with this requirement. Mobile homes offer an affordable housing option to many low- and moderate-income households. To further preserve the affordability of mobile homes, several cities in San Diego County, including Chula Vista and Santee, have adopted rent control policies and ordinances for mobile homes.

5. Licensed Residential Care Facilities

The Lanterman Developmental Disabilities Services Act (Sections 5115 and 5116) of the California Welfare and Institutions Code declares that mentally and physically disabled persons are entitled to live in normal residential surroundings. The use of property for the care of six or fewer persons with mental disorders or disabilities is required by law. A State-authorized, certified or authorized family care home, foster home, or group home serving six or fewer persons with disabilities or dependent and neglected children on a 24-hour-a-day basis is considered a residential use to be permitted in all residential zones. No local agency can impose stricter zoning or building and safety standards on these homes (commonly referred to as "group" homes) of six or fewer persons with disabilities than are required of the other permitted residential uses in the zone.

All jurisdictions in San Diego County comply with the Lanterman Act and conditionally permit larger residential care facilities serving seven or more residents in residential zones.

The Lanterman Act covers only licensed residential care facilities. The California Housing Element law also addresses the provision of transitional and supportive housing, which includes non-licensed housing facilities for persons with disabilities. This topic is discussed later.

6. Emergency Shelters

An emergency shelter is a facility that provides temporary shelter and feeding of indigents or disaster victims, operated by a public or non-profit agency. State law requires jurisdictions to identify adequate sites for housing which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all income levels, including emergency shelters and transitional housing (Section 65583(c)(1) of the Government Code). Recent changes in State law (SB 2) require that local jurisdictions make provisions in the zoning code to permit emergency shelters by right in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. Local jurisdictions may, however, establish standards to regulate the development of emergency shelters.

At the writing of this report, 18 of the 19 jurisdictions in the county allow emergency shelters by right consistent with State law. The following jurisdictions: Carlsbad (2012), Chula Vista (2018), Coronado (2014), Del Mar (2013), El Cajon (2015), Encinitas (2019), Escondido (2013), Imperial Beach (2012), La Mesa (2019), Lemon Grove (2019), National City (2011), Oceanside (2013), San Diego City (2016), San Diego County (2010), San Marcos (2012), Santee (2019), Solana Beach (2014) and Vista (2012) have amended their zoning ordinances to permit emergency shelters, consistent with the provisions

of SB 2. However, as of February 2020, the city of Poway did not have adequate provisions for emergency shelters in their zoning ordinance.

The City of Poway does not allow emergency shelters by right in any zone. The currently adopted Housing Element (2013-2020 cycle) acknowledges the need to update the City's zoning ordinance to allow year-round emergency shelters in compliance with state law, but no amendment to the zoning ordinance had been completed as of February 2020.

Furthermore, recent changes to State law require additional changes to the Emergency Shelter provisions:

- AB 139 (Emergency and Transitional Housing) – parking for shelter staff only; definition of sufficient capacity
- AB 101 (Low Barrier Navigation Center) – housing for homeless or at-risk homeless while waiting to transition to permanent housing

Jurisdictions must update their Zoning Ordinances to comply with State law. The City of Encinitas updated their zoning ordinance in 2019 to comply with AB 139.

7. Transitional and Supportive Housing

State law (AB 2634 and SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing. Under Housing Element law, transitional housing means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculation of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance (California Government Code Section 65582(h)).

Supportive housing means housing with no limit on length of stay, that is occupied by the target population and is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population means persons with low incomes who have one or more disabilities, including mental illness, HIV/AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 [commencing with Section 4500] of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (California Government Code Sections 65582(f) and (g)).

Accordingly, State law establishes transitional and supportive housing as a residential use and therefore local governments cannot treat it differently from other similar types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). Of the County's 19 jurisdictions, 17 had amended their zoning ordinances to include these provisions for transitional and supportive housing as of February 2020.

The County of San Diego amended the Zoning Ordinance in 2010 to distinguish between group care facilities for six or fewer people (family care home) and group care facilities for seven or more (group

care). For facilities serving six or fewer persons, a transitional or supportive housing project that requires state community care licensing would be considered a family care home by the County. For facilities serving seven or more persons, a transitional or supportive housing project that requires state community care licensing would be considered a group care facility, which is permitted in RC, C31, C34, C35, C37, and C46 zones and with a Major Use Permit in A70, A72, and all other residential zones.

The City of La Mesa has historically treated transitional housing for the homeless as "residential care facilities" or "community care facilities" in their zoning ordinance. Supportive housing is not expressly addressed in the Zoning Ordinance. The City recognizes that it must update its ordinance to comply with state requirements for transitional and supportive housing, but had not completed amendments to its zoning code as of the writing of this report.

The City of Vista amended its zoning code in 2015 to allow supportive housing subject to development standards applicable to residential uses in the same zone. The City permits transitional housing facilities for battered women and children (serving six or fewer clients) in all residential zones. Other transitional housing facilities are permitted only in the City's RM zone.

The County of San Diego and City of La Mesa do not fully comply with all of the requirements of SB 2 in their treatment of transitional and supportive housing, and their zoning ordinances will need to be further amended in order to maintain consistency with State law.

8. Single-Room Occupancy (SRO)

AB 2634 also mandates that local jurisdictions address the provision of housing options for extremely low-income households, including Single Room Occupancy units (SRO). SRO units are one room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other.

As of February 2020, the cities of Del Mar and La Mesa do not have adequate SRO provisions in their zoning ordinances.

9. Farmworker Employee Housing

The California Employee Housing Act requires that housing for six or fewer employees be treated as a single-family residential use. The Employee Housing Act also requires that housing for agricultural workers consisting of 36 beds or 12 units be treated as an agricultural use and permitted where agricultural uses are permitted in the same way that other agricultural uses are permitted in that zone. No conditional use permit, zoning variance, or other discretionary zoning clearance can be required for these employee housing developments that is not required of any other agricultural activity in the same zone. The permitted occupancy in employee housing in a zone allowing agricultural uses must include agricultural employees who do not work on the property where the employee housing is located. Compliance with these requirements among participating jurisdictions is summarized in Table 67. Some jurisdictions allow employee housing for six or fewer employees as a single-family residential

use but have not updated their zoning ordinance to explicitly permit this use in accordance with the California Housing Act.

Escondido permits a caretaker's residence for farmworkers deriving the majority of their income from employment on the premises in most residential zones that allow agriculture, but does not specify that farmworker employee housing is allowed in all zones where commercial agricultural use is permitted.

The City of La Mesa has no agricultural zones but allows agricultural uses in some single-family residential zones. However, the City considers agricultural uses in these zones accessory the the residential uses and not commercial in nature, with the agricultural products intended for consumption by the household. As such, provisions for farmworker employee housing in these residential zones that allow accessory agricultural use is not required by State law. The City recognizes that it should amend the Zoning Ordinance to clarify the types of non-commercial agricultural activities allowable in the single-family zones as accessory uses.

The City of Solana Beach does not have any agricultural zones, there are no agricultural operations within Solana Beach, and no full-time agricultural workers reside in the City. Because of this, the City argues that other affordable housing options provided by the City can serve the housing needs of farmworkers as well, and there is not a need to specifically provide for farmworker employee housing within the City.

Table 67: Farmworker Employee Housing by Jurisdiction

Jurisdiction	Commercial Agricultural Zoning / Uses	Permits Farmworker Housing in Zoning Ordinance	Compliance with Employee Housing Act
Carlsbad	Yes	Yes	Yes
Chula Vista	Yes	Yes	Yes
Coronado	No	n/a	No
Del Mar	No	n/a	No
El Cajon	Yes	Yes	Yes
Encinitas	No	n/a	Yes
Escondido	Yes	No	No
Imperial Beach	No	n/a	Yes
La Mesa	No	n/a	No
Lemon Grove	No	n/a	No
National City	No	n/a	No
Oceanside	Yes	Yes	No
Poway	Yes	Yes	No
San Diego (City)	Yes	Yes	No
San Diego (County)	Yes	Yes	No
San Marcos	Yes	Yes	No
Santee	Yes	Yes	No
Solana Beach	No	n/a	No
Vista	Yes	Yes	Yes

D. Building Codes and Occupancy Standards

1. Building Codes

Building codes, such as the California Building Standards Code[44] and the Uniform Housing Code are necessary to protect public health, safety, and welfare. However, local codes that require substantial improvements to a building might not be warranted and deter housing construction and/or neighborhood improvement.

The California Building Standards Code is published every three years by order of the California legislature. The Code applies to all jurisdictions in the State of California unless otherwise annotated. Adoption of the triennial compilation of Codes is not only a legal mandate, it also ensures the highest available level of safety for citizens and that all construction and maintenance of structures meets the

[44] California Building Standards Code, adopted by the a Building Standards Commission, is actually a set of uniform building, electrical, mechanical, and other codes adopted by professional associations such as the International Conference of Building Officials, and amended to include California-specific requirements.

highest standards of quality. Most jurisdictions in the San Diego region have adopted the 2019 California Building Standards Code, with the exception of National City, which has adopted the 2016 California Building Code. Other codes commonly adopted by reference within the region include the California Mechanical Code, California Plumbing Code, California or National Electric Code, Uniform Housing Code, and California Fire Code. Less common are the California Uniform Code for the Abatement of Dangerous Buildings, the Urban-Wildland Interface Code, and the Uniform Code for Building Conservation. Most jurisdictions have amended portions of these codes to reflect non-arbitrary local conditions including geographical and topographic conditions unique to each locality. Although minor amendments have been incorporated to address local conditions, no additional regulations have been imposed by the city or county that would unnecessarily add to housing costs or otherwise impede fair housing choice.

2. Occupancy Standards

Disputes over occupancy standards are typical tenant/ landlord and fair housing issues. Families with children and large households may face discrimination in the housing market, particularly in the rental housing market, because landlords are reluctant or flatly refuse to rent to such households. Establishing a strict occupancy standard, either by the local jurisdictions or by landlords on the rental agreements, may be a violation of fair housing practices.

"2+1" Rule

Most State and federal housing programs use the "2+1" rule as an acceptable occupancy standard. The appropriate number of persons per housing unit is estimated at two persons per bedroom plus an additional person. For example, a two-bedroom unit could have five occupants.

In general, no state or federal regulations govern occupancy standards. The State Department of Fair Employment and Housing (DFEH) uses the "two-plus-one" rule in considering the number of persons per housing unit – two persons per bedroom plus an additional person. Using this rule, a landlord cannot restrict occupancy to fewer than three persons for a one-bedroom unit or five persons for a two-bedroom unit, etc. While DFEH also uses other factors, such as the age of the occupants and size of rooms, to consider the appropriate standard, the two-plus-one rule is generally followed.

Other guidelines are also used as occupancy standards. The Uniform Housing Code (Section 503.2) requires that a dwelling unit have at least one room which is not less than 120 square feet in area. Other habitable rooms, except kitchens, are required to have a floor area of not less than 70 square feet. The Housing Code further states that where two persons occupy a room used for sleeping purposes, the required floor area should be increased at a rate of 50 square feet for each occupant in excess of two. There is nothing in the Housing Code that prevents people from sleeping in the living or dining rooms, as long as these rooms have a window or door meeting all the provisions of the California Building Code for emergency egress. The Fire Code allows one person per 150 square feet of "habitable" space. These standards are typically more liberal than the "two-plus-one" rule. For example, three people could sleep in a one-bedroom apartment where the bedroom is at least 120 square feet; and where the living/dining area is at least 170 square feet, an additional three people could sleep there. Therefore, a 290-square foot one-bedroom apartment can accommodate up to six persons or a two-bedroom 410-square foot apartment can sleep up to nine persons.

A review of occupancy standards for jurisdictions within the San Diego region revealed that none of the jurisdictions overtly limit the number of people who can occupy a housing unit. As previously discussed, court rulings stated a Zoning Ordinance cannot regulate residency by discrimination

between biologically-related and unrelated persons. None of the jurisdictions in the county have a definition of "family" in their Zoning Ordinance with references to how members of a family are related or the maximum number of members in the household. However, the definition of "family" in the Solana Beach zoning ordinance excludes individuals. Such a definition can be considered an impediment because it may give landlords the opportunity to deny renting single-family or multi-family dwelling units to single persons.

E. Affordable Housing Development

In general, many minority and special needs households are disproportionately affected by a lack of adequate and affordable housing in a region. While affordability issues are not directly fair housing issues, expanding access to housing choices for these groups cannot ignore the affordability factor. Insofar as rent-restricted or non-restricted low-cost housing is concentrated in certain geographic locations, access to housing by lower-income and minority groups in other areas is limited and can therefore be an indirect impediment to fair housing choice. Furthermore, various permit processing and development impact fees charged by local government results in increased housing costs and can be a barrier to the development of affordable housing. Other policies and programs, such as inclusionary housing and growth management programs, can either facilitate or inhibit the production of affordable housing. These issues are examined in the subsections below.

1. Siting of Affordable Housing

The San Diego region has a large inventory of rent-restricted multi-family housing units. The distribution of these units, however, is highly uneven throughout the region, with dense clusters of assisted housing located in central San Diego, National City, Chula Vista and Escondido (see Figure 13 on page 91). Almost three-quarters (71.4 percent) of the region's rent-restricted multi-family housing stock is concentrated in these four cities. Jurisdictions with the highest concentration of rent-restricted multi-family housing units (as measured by the ratio of rent-restricted units to total housing units) include National City (12.1 percent), San Marcos (5.4 percent) and Carlsbad (4.3 percent) (see Table 68). Jurisdictions with the lowest concentration of rent restricted multi-family units (as measured by the number of restricted units per 500 housing units) are Del Mar (0.0), Solana Beach (0.0), Encinitas (2.9), and Lemon Grove (5.4).

Table 68: Rent-Restricted Multi-Family Housing Units by Jurisdiction

Jurisdiction	Rent Restricted Units	Total Housing Units (2019)	% of Housing Stock Rent Restricted	% of All Rent Restricted Units in County	Rent Restricted Units per 500 Housing Units
Urban County					
Coronado	142	9,740	1.5%	0.4%	7.3
Del Mar	0	2,625	0.0%	0.0%	0.0
Imperial Beach	129	10,074	1.3%	0.3%	6.4
Lemon Grove	98	9,114	1.1%	0.2%	5.4
Poway	704	16,917	4.2%	1.8%	20.8
San Marcos	1,729	32,126	5.4%	4.4%	26.9
Solana Beach	0	6,569	0.0%	0.0%	0.0
Unincorporated Areas	2,215	178,844	1.2%	5.6%	6.2
Entitlement Cities					
Carlsbad	2,037	47,080	4.3%	5.2%	21.6
Chula Vista	2,545	85,535	3.0%	6.5%	14.9
El Cajon	1254	36,148	3.5%	3.2%	17.3
Encinitas	152	26,495	0.6%	0.4%	2.9
Escondido	1,559	48,833	3.2%	4.0%	16.0
La Mesa	566	26,869	2.1%	1.4%	10.5
National City	2,097	17,264	12.1%	5.3%	60.7
Oceanside	1,307	65,902	2.0%	3.3%	9.9
San Diego	21,937	545,645	4.0%	55.7%	20.1
Santee	578	21,100	2.7%	1.5%	13.7
Vista	349	32,580	1.1%	0.9%	5.4
Total County	**39,398**	**1,219,460**	**3.2%**	**100.0%**	**16.2**

Source: California Department of Finance, 2019; HUD, California Housing Partnership, and participating jurisdictions.

2. Development Fees

Housing construction imposes certain short- and long-term costs upon local government, such as the cost of providing planning services and inspections. As a result, San Diego County jurisdictions rely upon various planning and development fees to recoup costs and ensure that essential services and infrastructure are available when needed. Planning fees for the County of San Diego and its jurisdictions are summarized in Table 69. As shown, fees vary widely based on the needs of each jurisdiction.

Table 69: Planning Fees by Jurisdiction

Jurisdiction	General Plan Amendment	CUP	Variance	Tract Map	Parcel Map	Zone Change
Carlsbad	$4,677-$6,747	$4,913	$3,098	$8,193	$3,678	$5,373-$7,279
Chula Vista	$20,000[1]	$11,000[1]	$9,000[1]	$10,000[1]	$2,500[1]	$10,000[1]
Coronado	$5,000[1]	$3,533	$3,846	--	$1,703	$5,000[1]
Del Mar	$10,000[1]	$8,513	$5,370	$6,250	$5,240	$10,000[1]
El Cajon	$3,505	$5,195	$1,025	$6,225 + $74/lot	$3,625 + $26/lot	$4,125
Encinitas	$13,000[1]	$6,000	$3,810	$13,000 + 650/lot	$4,555	$20,000[1]
Escondido	$5,185-$9,880	$3,050	$2,030	$4,107-$6.905	$2,635	$3,900-$5,100
Imperial Beach	$5,000	$2,000	$1,800	$2,500	$2,000	$3,000
La Mesa	$15,179	$2,095-$4,150	$2,097-$4,127	$7,557	$5,859	$13,730
Lemon Grove	$3,000	$1,500	$750	$4,500	$2,700	$1,000
National City	$5,500	$3,700	$3,700	$4,000	$3,000	$5,500
Oceanside	$10,000-$15,000[1]	$5,000[1]	$4,000[1]	$8,000[1]	$3,000[1]	$8,000-$15,000[1]
Poway	$1,917	$3,299	$799	$4,174	$2,711	$1,917
San Diego City	$12,000[1]	$8,000[1]	$8,000[1]	$10,000[1]	$10,000[1]	$12,000[1]
San Diego County	$16,227[1]	$10,224[1]	$3,945[1]	$19,099[1]	$11,711[1]	$10,872[1]
San Marcos	$2,500	$3,476	$564	$2,690 + $50/lot	$2,090	$872
Santee	$13,000[1]	$15,000-$20,000[1]	$2,500[1]	$16,000[1]	$6,000[1]	$13,000[1]
Solana Beach	$10,000[1]	$8,660	$6,555	$14,000	$10,725	$10,000[1]
Vista	$9782	$7,430	$3,119	$6,719-$9,253	$4,368	$9,621

Source: Participating jurisdictions, 2020.
Notes:
1. Indicates initial deposit amount. Actual fee is full cost recovery.

3. Development Impact Fees

Jurisdictions also charge a variety of impact fees to offset the cost of providing the infrastructure and public facilities required to serve new development. Until 1978, property taxes were the primary revenue source for financing the construction of infrastructure and improvements required to support new residential development. The passage of Proposition 13 in 1978 has limited a local jurisdiction's ability to raise property taxes and significantly lowered the ad valorem tax rate, increasing reliance on other funding sources to provide infrastructure, public improvements, and public services. An alternative funding source widely used among local governments in California is the development impact fee, which is collected for a variety of improvements including water and sewer facilities, parks, and transportation improvements.

To enact an impact fee, State law requires that the local jurisdiction demonstrate the "nexus" between the type of development in question and the impact being mitigated by the proposed fee. Also, the amount of the fee must be roughly proportional to the impact caused by the development. Nevertheless, development impact fees today have become a significant cost factor in housing development. Jurisdictions in San Diego County have imposed a variety of impact fees for new development (Table 70).

Table 70: Development Impact Fees by Jurisdiction

	Parks	Transportation/ Traffic	Public Facilities/ Sewer	Public Art
Carlsbad	■	■	■	
Chula Vista	■	■	■	
Coronado		■	■	
Del Mar		■		
El Cajon			■	
Encinitas	■	■	■	
Escondido	■	■	■	■
Imperial Beach		■	■	
La Mesa	■	■	■	
Lemon Grove	■	■	■	
National City	■		■	
Oceanside	■	■	■	
Poway	■	■	■	
San Diego City	■	■	■	■
San Diego County	■	■	■	
San Marcos	■	■	■	
Santee	■	■	■	
Solana Beach	■	■	■	■
Vista	■	■	■	

Source: Participating jurisdictions, 2015.

The contribution of fees to home prices varies temporally as well as spatially. When times are good, housing production tends to lag behind demand, especially in coastal markets. Housing prices during such periods are chiefly affected by the balance between supply and demand and are much less affected by construction and development costs. When economic times are bad and demand is weak, housing prices are more sharply affected by the prices of construction inputs, including fees. The strength of the economy and housing market also determines the degree of fee shifting and who ultimately pays fees. During strong economic times, it is the final homebuyer or renter who ends up paying housing development fees; the builder or developer is mostly an intermediary. During recessionary periods, the burden of paying fees may be shifted backwards to the landowner.

4. Linkage Fees

A linkage fee is a development impact fee applied to non-residential development. This fee can be used by local governments to support affordable housing construction and it is applied in recognition of the housing needs of lower-income workers who often are employed by end users of new development. Linkage fees can facilitate de-concentration of affordable housing development and reduce the negative social and environmental effects of jobs-housing imbalances in a region if the use of this funding is combined with a policy that requires the scattering of affordable units throughout a community and/or require concurrent construction of market-rate and affordable units in new development.

Currently, the City of San Diego is the only jurisdiction that charges a linkage fee to non-residential development to offset the cumulative effects of non-residential development on affordable housing and transportation. The underlying purpose of the City of San Diego's linkage fee is to ensure that new office, retail, research and development, manufacturing, warehouse, and hotel development pay a fair share of the subsidies necessary to house the low-income employees related to such development. The fees are placed in the San Diego Housing Trust Fund and can be utilized to assist the construction of affordable housing units located anywhere within the boundaries of the City of San Diego. The Municipal Code establishes a mechanism to ensure a geographic nexus between the location of new jobs and the expenditure of revenue for housing projects.[45]

F. Other Land Use Policies, Programs, and Controls

Land use policies, programs, and controls can impede or facilitate housing development and can have implications for fair housing choice in a community. Inclusionary housing policies and redevelopment project areas can facilitate new affordable housing projects, while growth management programs can impede new affordable housing development. Jurisdictions that have not sought Article 34 authority may also be prevented from directly engaging in affordable housing development. Table 71 identifies jurisdictions that are affected by or have adopted land use policies, programs, and controls that may have a negative impact on housing development and fair housing choice.

[45] For more information, see Chapter 9, Article 8, Division 6 of the San Diego Municipal Code.

Table 71: Land Use Policies and Controls by Jurisdiction

Jurisdictions	Article 34	Growth Management	Inclusionary Housing
Carlsbad	■	■	■
Chula Vista	■	■	■
Coronado			■
Del Mar			■
El Cajon	■		
Encinitas		■	■
Escondido		■	
Imperial Beach			
La Mesa	■		
Lemon Grove			
National City			
Oceanside	■		■
Poway			■
San Diego City	■	■	■
San Diego County		■	
San Marcos		■	■
Santee			
Solana Beach		■	■
Vista	■		

1. Article 34

Article 34 of the State Constitution requires a majority vote of the electorate to approve the development, construction, or acquisition by a public body of any "low rent housing project" within that jurisdiction. In other words, for any projects to be built and/or operated by a public agency where at least 50 percent of the occupants are low-income and rents are restricted to affordable levels, the jurisdiction must seek voter approval known as "Article 34 authority" to authorize that number of units. Several jurisdictions within the San Diego region have obtained Article 34 authority to be directly involved in the development, construction, or acquisition of low-rent housing.

Carlsbad voters approved an Article 34 measure to allow no more than 200 units of senior low income housing in November 1980; this authority has only been exercised twice since voter approval. The City of Chula Vista currently has 24 remaining Article 34 units allotted and on November 7, 2006 voters approved authority for an additional 1,600 units. No projects requiring Article 34 authority have been proposed in Del Mar, therefore, residents have not been asked to vote on a referendum to allow the City to develop, construct, or acquire affordable housing. The City of El Cajon has voter approval for senior projects only and complies with Article 34 for all other housing types. In 1978, La Mesa residents voted to provide the City with authority to develop, acquire, or construct 200 senior units under Article 34. To date, the City has used 128 units of its Article 34 authority for the development of La Mesa Springs and has a remaining capacity of 72 units. Voters in the City of San Diego approved Measure M in 2016 to allow the City to develop, construct, or acquire up to 49,180

affordable units, an increase in 38,680 units over the previous number of allowable units. The voters of the City of Vista approved Proposition W in 1980, authorizing the development of up to 95 low-income, rental housing units per year without going to a public vote.

In the past, Article 34 may have prevented certain projects from being built because seeking voter approval for such activities was controversial and difficult. In practice, most public agencies have learned how to structure projects to avoid triggering Article 34, such as limiting public assistance to 49 percent of the units in the project. Furthermore, the State legislature has enacted Sections 37001, 37001.3, and 37001.5 of the Health and Safety Code to clarify ambiguities relating to the scope of the applicability of Article 34.

In 2018, two State Senators introduced legislation to repeal Article 34 as Senate Constitutional Amendment 1 (SCA 1). The California Senate passed SCA 1 in September 2019 by unanimous vote. If passed by the California Assembly, the amendment can be placed on the ballot for potential approval by California voters.

2. Growth Management Programs

Growth management programs facilitate well-planned development and ensure that the necessary services and facilities for residents are provided. However, a growth management program may act as a constraint if it prevents a jurisdiction from addressing its housing needs, which could indirectly impede fair housing choice. These programs range from general policies that require the expansion of public facilities and services concurrent with new development, to policies that establish urban growth boundaries (the outermost extent of anticipated urban development), to numerical limitations on the number of dwelling units that may be permitted annually. Of the county's 19 jurisdictions, eight have adopted Growth Management Programs. While the programs are intended to manage growth, the programs are highly variable in detail.

The City of Carlsbad has a growth management program that establishes a maximum amount of dwelling units for each quadrant of the City, and also includes performance standards that require services and infrastructure to be provided to meet the demands of new development. However, the City of Carlsbad is also recognized as having one of the State's most effective inclusionary housing policies with a proven affordable housing production track record.

Chula Vista's Growth Management Program establishes thresholds for eleven areas including traffic, police, fire and emergency services, schools, libraries, parks and recreation, water, sewer, drainage, air quality, and economics.

The Encinitas General Plan Land Use Element includes restrictions on residential construction based on average citywide density, which have been identified as obsolete. While the City's adopted Housing Element acknowledges the need to revise the Land Use Element to eliminate these policies as part of its affordable housing implementation program, amendments to the Land Use Element to eliminate these growth management policies have not yet been adopted. Encinitas requires voter approval to increase residential density or modify land use from non-residential zoning. However, in 2018 a California judge temporarily suspended this requirement to allow the City to adopt land use changes included in the City's 2013-2021 Housing Element.

Escondido requires voter approval for all proposals to increase residential density or non-residential intensity (such as through general plan amendments). However, the City does not require voter approval for increase in density in cases where affordable housing is involved to ensure compliance with housing law.

In 1979, the City of San Diego implemented a Tier System to manage growth. Under this system, the Urban Core would develop first, then the outlying urban area, and finally the Future Urbanizing Area which is now being developed. Growth is managed in the unincorporated areas of San Diego County through the Multiple Species Conservation Plan (MSCP) and establishment of residential buildout ceilings and large minimum lot sizes (40 acres in some cases) within several community planning areas.

Residential growth management requirements in San Marcos require new development in the city to ensure funding and timely construction of all threshold public facilities or services, as required by location.

Solana Beach voters passed Proposition T in 2000, which requires voter approval to change, alter, or increase General Plan residential land use categories. Because the City can meet its RHNA requirements under existing land use designations, it does not consider the growth management plan an impediment to affordable housing.

The cities of Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, Santee, and Vista have not adopted growth management programs.

State housing law mandates a jurisdiction facilitate the development of a variety of housing to meet the jurisdiction's fair share of regional housing needs. Any growth management measure that would compromise a jurisdiction's ability to meet its regional housing needs may have an exclusionary effect of limiting housing choices and opportunities of regional residents or concentrating such opportunities in other areas of the region.

3. Inclusionary Housing Programs

Inclusionary housing describes a local government's requirement specifying a percentage of new housing units be reserved for, and affordable to, lower- and moderate-income households. The goal of inclusionary housing programs is to increase the supply of affordable housing commensurate with new market-rate development in a jurisdiction. This can result in an improved regional jobs-housing balances and foster greater economic and racial integration within a community. The policy is most effective in areas experiencing rapid growth and a strong demand for housing.

Inclusionary programs can be voluntary or mandatory. Voluntary programs typically require developers to negotiate with public officials but do not specifically mandate the provision of affordable units. Mandatory programs are usually codified in the zoning ordinance and developers are required to enter into a development agreement specifying the required number of affordable housing units or payment of applicable in-lieu fee[46] prior to obtaining a building permit.

[46] An in-lieu fee is the payment of a specified sum of money instead of constructing the required number of affordable housing units. The fee is used to finance affordable housing elsewhere in a community.

In San Diego County, 10 jurisdictions had adopted inclusionary housing programs as of February 2020. All programs in the county can be described as mandatory because they require dedication of a fixed percentage of proposed units affordable to lower or moderate income households or payment of an in-lieu fee used to build new affordable housing units in the jurisdiction. Inclusionary housing programs in the county vary considerably by jurisdiction.

The City of Carlsbad requires 15 percent of all base residential units within any Master Plan/Specific Plan community or other qualified subdivision (currently seven units or more) to be restricted and affordable to lower-income households.

Chula Vista requires the provision of 10 percent (five percent low-income and five percent moderate-income) affordable housing within projects of 50 or more dwelling units.

The City of Coronado's inclusionary housing program requires that parcel or subdivision maps involving two or more lots or two or more dwelling units provide 20 percent of the total units in the development for rent to lower-income households. Under this program no inclusionary units have been constructed by market-rate developers as of the writing of this report; however, in-lieu fees collected from these developers have contributed to the expansion of affordable housing in the City through the Community Development Agency programs.

The City of Del Mar Assistance Program requires that certain housing developments pay an in-lieu fee or set aside some of units for affordable housing. In-lieu fees are placed in a Housing Assistance Reserve and used to provide rental subsidies to low-income households.

The City of Encinitas requires residential development to provide 15 percent of units for low-income households or 10 percent for very low-income households unless exempted or an alternative for providing affordable units is approved.

The City of El Cajon's affordable housing requirement was based on its redevelopment housing requirement. However, with the dissolution of redevelopment in California, this requirement is no longer applicable. The City's Housing Element includes an action to evaluate the need for a citywide inclusionary housing ordinance, but the City had not adopted an updated ordinance as of February 2020.

National City's affordable housing requirement was also part of its redevelopment program, which was eliminated in 2011 by changes to state law. Remaining redevelopment funds earmarked for affordable housing are used to increase, maintain, and preserve affordable housing for low- and moderate-income households.

The City of Oceanside requires new residential development to include 1015 percent affordable units or play an in-lieu fee. The City of Poway requires new residential development to make 15 percent of units affordable to low-income households, 20 percent affordable to moderate-income households, or pay an in-lieu fee. The City of San Diego requires all residential development of two or more units to pay an Inclusionary Affordable Housing Fee or provide affordable units on site, unless exempt.
In October 2018 the County Board of Supervisors directed staff to prepare an economic analysis and criteria for a potential General Plan Amendment to create an affordable housing program and/or an

inclusionary housing ordinance. To date the Board has not taken further action on these potential amendments.

San Marcos requires residential development to provide 15 percent of units as affordable or pay an in-lieu fee, depending on the size of the development. The City of Solana Beach requires residential development of five or more units to set aside 15 percent as affordable units.

The City of Vista eliminated their inclusionary housing requirements in 2015.

G. Policies Causing Displacement or Affect Housing Choice of Minorities and Persons with Disabilities

Local government policies could result in displacement or affect representation of minorities or the disabled.

1. Reasonable Accommodation

Under State and Federal laws, local governments are required to "reasonably accommodate" housing for persons with disabilities when exercising planning and zoning powers. Jurisdictions must grant variances and zoning changes if necessary to make new construction or rehabilitation of housing for persons with disabilities feasible, but are not required to fundamentally alter their zoning ordinance.

Although most local governments are aware of State and federal requirements to allow reasonable accommodations, if specific policies or procedures are not adopted by a jurisdiction, disabled residents may be unintentionally displaced or discriminated against. Lemon Grove is the only jurisdiction in the region that had not adopted a formal reasonable accommodation procedure as of February 2020.

Currently, most of the cities with adopted reasonable accommodations procedures (with the exception of Escondido, La Mesa, National City, Oceanside, and Santee) have a definition of disabled person in their Zoning Ordinance. A jurisdiction's definition of a disabled person can be considered an impediment to fair housing if it is not consistent with the definition of disability provided under the Fair Housing Act. The Act defines disabled person as "those individuals with mental or physical impairments that substantially limit one or more major life activities." All of the definitions used by San Diego jurisdictions are consistent with the Fair Housing Act and are not considered an impediment.

H. Local Housing Authorities

In the San Diego region, the HUD Housing Choice Voucher program is administered by six different local housing authorities, two of which also oversee a public housing program. The following housing authorities only administer housing choice vouchers: Carlsbad, Encinitas, Oceanside, and National City. The housing authorities for the City and County of San Diego also own and manage public housing in addition to administering the Housing Choice Voucher program. The availability and use of Housing Choice Vouchers and public housing units must also adhere to fair housing laws. Most local housing authorities in the county have adopted priorities or preferences for Housing Choice Vouchers and/or public housing. Typically, families with children, elderly families, disabled families, and veterans are given preferences.

Section 16(a)(3)(B) of the United States Housing Act (Housing Act) mandates that public housing authorities adopt an admissions policy that promotes the deconcentration of poverty in public housing. HUD emphasizes that the goal of deconcentration is to foster the development of mixed-income communities within public housing. In mixed-income settings, lower income residents are provided with greater access to employment and information networks.

For Housing Choice Vouchers, the Housing Act mandates that not less than 75 percent of new admissions must have incomes at or below 30 percent of the Area Median Income. The remaining balance of 25 percent may have incomes up to 50 percent of the Area Median Income. For public housing, the Housing Act mandates that not less than 40 percent of new admissions must have incomes at or below 30 percent of the Area Median Income. The balance of 60 percent of new admissions may have incomes up to 50 percent of the Area Median Income.

I. California Environmental Quality Act (CEQA)

CEQA is California's broadest environmental law as it applies to all discretionary projects proposed to be conducted or approved by a public agency, including private projects that require government approval. The primary purpose of CEQA is to disclose to the public the significant environmental effects of a proposed project. CEQA also requires that public agencies disclose to the public the decision making process utilized to approve projects and is intended to enhance public participation in the environmental review process.

In October 2011, the Governor signed into law SB 226, which allows for streamlined CEQA review for certain infill development projects, including some Transit Oriented Developments (TODs). The statute allows an exemption or limited environmental review of projects that meet certain criteria and are consistent with earlier policy documents such as General Plans, Specific Plans, or Master Plans. Subsequent environmental review of qualifying projects is limited to new or substantially greater impacts not adequately addressed in an earlier CEQA document.

The streamlined environmental process allowed by SB 226 makes it possible for the environmental impacts of documents like a General Plan, Specific Plan, or Master Plan area to be analyzed long before a physical development project is proposed. Because SB 226 does not include a time limit, CEQA's environmental review and public comment requirements could be satisfied by a document prepared years prior to the proposal of a specific development proposal. Because infill and TOD

projects are often proposed in under-served, lower-income and minority neighborhoods, the disjointed disclosure of potential environmental impacts resulting from SB 226 has potential for disproportionate adverse impacts on protected classes.

J. Community Representation and Participation

Adequate community involvement and representation is important to overcoming and identifying impediments to fair housing. Decisions regarding housing development in a community are typically made by the City Council or Board of Supervisors and applicable Planning Commissions. The Council or Board members are elected officials and answer to the constituents. Planning Commissioners are residents appointed by the Council or Board and often serve an advisory role.

In addition to the City Council, Board of Supervisors, and Planning Commission, most jurisdictions have appointed commissions, committees, and task forces to address specific issues. Commissions dealing directly with housing issues are most common in the region's 19 jurisdictions; however, only National City and the City of San Diego have commissions that specifically address special housing needs and only the City and County of San Diego have commissions specifically addressing the housing needs of persons with disabilities or families with children. These issues are often addressed in the remaining jurisdictions as part of a standing commission.

Community participation can be limited or enhanced by actions or inaction by a public agency. According to the results of the Fair Housing Survey, ten San Diego residents reported being discriminated against by a government staff person.

A broader range of residents may feel more comfortable approaching an agency with concerns or suggestions if that agency offers sensitivity or diversity training to its staff members that typically interface with the public. In addition, if there is a mismatch between the linguistic capabilities of staff members and the native languages of local residents, non-English speaking residents may be unintentionally excluded from the decision making process. Another factor that may affect community participation is the inadequacy of an agency or public facility to accommodate residents with various disabilities.

Most jurisdictions in San Diego County have bi-lingual capabilities to serve Spanish-speaking residents, and many have multi-lingual capabilities. For example, the City of El Cajon offers services in Arabic. The HUD Programs Administration Office at the City of San Diego accommodates Spanish, Arabic and Tagalog speakers, and San Diego (City) has other multilingual capabilities upon request. The cities of Escondido, Oceanside and Vista, as well as the County of San Diego, have contracts with various language lines and are able to accommodate all languages. And the City of San Marcos has multi-lingual capabilities in Vietnamese, Farsi, Mandarin, Russian, Ukrainian, Arabic, Armenian, Afrikaans and Sign Language, in addition to Spanish. In addition, the city halls of all participating jurisdictions and the County Administration Buildings are accessible to persons with disabilities.

The City of San Diego and the County of San Diego also have Community Planning Groups (CPGs) made up of local stakeholders that advise decision makers on land use issues. Planning group members are elected to their positions and their input to decision makers is nonbinding. The 2017/2018 San Diego County Grand Jury received a complaint that City of San Diego CPGs delay hearing agenda

items as a way to de facto restrict growth in the communities they represent. The Grand Jury found that membership of many CPGs in the City may not appropriately reflect diversity with community and that the City had not taken sufficient action to address fair community representation on CPGs. The Grand Jury recommended a number of actions to address these issues, including developing methods and providing resources to improve recruiting to CPGs that could result in more diverse membership, and considering more close monitoring of CPG meetings by City staff to preclude requests for inappropriate project additions or modifications that could delay developments.

Most jurisdictions in the county do not offer periodic sensitivity or diversity training for staff personnel. However, some jurisdictions do send their employees to periodic trainings. For example, both the City of Carlsbad and the City of Escondido send their employees to Respectful Workplace Training every two years. The City of Oceanside requires its Housing Staff to attend periodic trainings regarding Fair Housing Discrimination (Section 504 – Reasonable Accommodation training); these trainings are organized by North County Lifeline. The City of San Diego covers harassment and discrimination topics in its mandatory New Employee Orientation. In addition, a number of training opportunities (including EEO issues, sexual harassment prevention, reasonable accommodations, and customer service) are available to its supervisory employees. The County of San Diego provides at periodic training for its employees covering inclusion, diversity, age discrimination, cultural competency, unconscious bias. Furthermore, the City of Santee conducts mandatory training on a bi-annual basis. Topics covered in the mandatory training include: the types of behaviors that would constitute discrimination, harassment and/or retaliation as defined by the City of Santee; definitions of the types of behaviors that create a hostile, offensive and/or intimidating work environment; and what to do if an employee believes such behaviors have occurred in the workplace.

CHAPTER 6

FAIR HOUSING PROFILE

AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

This chapter provides an overview of the institutional structure of the housing industry with regard to fair housing practices. In addition, this chapter discusses the fair housing services available to residents in San Diego County, as well as the nature and extent of fair housing complaints received by the fair housing providers. Typically, fair housing services encompass the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach, including the dissemination of fair housing information. Tenant/landlord counseling services are usually offered by fair housing service providers, but are not considered fair housing services.

A. Fair Housing in the Homeownership Market

Part of the American dream involves owning a home in the neighborhood of one's choice. Not all Americans, however, have always enjoyed equal access to homeownership due to credit market distortions, "redlining," steering, and predatory lending practices. This sub-section analyzes potential impediments to fair housing in the home ownership sector.

1. The Homeownership Process

The following discussions describe the process of homebuying and likely situations when a person/household may encounter housing discrimination. However, much of this process occurs in the private housing market, over which local jurisdictions have little control or authority to regulate. The recourse lies in the ability of the contracted fair housing service providers in monitoring these activities, identifying the perpetrators, and taking appropriate reconciliation or legal actions.

Advertising

The first thing a potential buyer is likely to do when they consider buying a home is search advertisements either in magazines, newspapers, or the Internet to get a feel for what the market offers. Advertisements cannot include discriminatory references, such as the use of words describing:

- Current or potential residents;
- Neighbors or the neighborhood in racial or ethnic terms;
- Adults preferred;
- Perfect for empty-nesters;
- Conveniently located by a Catholic Church; or
- Ideal for married couples without kids.

In a survey of online listings for homes available for purchase in San Diego County in March 2020, a limited number of advertisements included potentially discriminatory language. Of the total 526 listings surveyed, 103 listings included references to something other than the physical description of the home or included amenities and services (Table 72). All of the potentially discriminatory

advertisements were targeted specifically at families through the identification of quality school districts, nearby schools, and available family amenities.

Table 72: Potential Discrimination in Listings of For-Sale Homes

Discrimination Type	Number of Listings	Potentially Discriminatory Language
No Discriminatory Language	423	--
Household Size/Family Related	103	▪ The right home for a new couple looking to grow ▪ Home is located in a safe neighborhood with a lot of kids ▪ Easiest walk to local high-rated schools ▪ Perfect backyard ready for the family and entertaining! ▪ This home is right next to the ocean, perfect for an active family

Note: Examples are direct quotes from the listings (including punctuation and emphasis).
Source: realtor.com, accessed March 2020.

Lending

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide a lot of sensitive information including their gender, ethnicity, income level, age, and familial status. Most of this information is used for reporting purposes required of lenders by the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA). Chapter 4 of this AI provides a detailed analysis of HMDA data for the San Diego region.

Real Estate Agents

Real estate agents may act as agents of discrimination. Some unintentionally, or possibly intentionally, may steer a potential buyer to particular neighborhoods by encouraging the buyer to look into certain areas; others may choose not to show the buyer all choices available. Agents may also discriminate by who they agree to represent, who they turn away, and the comments they make about their clients.

The California Association of REALTORS® (CAR) has included language on many standard forms disclosing fair housing laws to those involved. Many REALTOR® Associations also host fair housing trainings/seminars to educate members on the provisions and liabilities of fair housing laws, and the Equal Opportunity Housing Symbol is also printed on all CAR forms as a reminder.

Covenants, Conditions, and Restrictions (CC&Rs)

Covenants, Conditions, and Restrictions (CC&Rs), are restrictive promises that involve voluntary agreements, running with the land with which they are associated and are listed in a recorded Declaration of Restrictions. The Statute of Frauds (Civil Code Section 1624) requires them to be in writing, because they involve real property. They must also be recorded in the County where the property is located in order to bind future owners. Owners of parcels may agree amongst themselves as to the restrictions on use, but in order to be enforceable they must be reasonable.

The California Department of Real Estate reviews CC&Rs for all subdivisions of five or more lots, or condominiums of five or more units. This review is authorized by the Subdivided Lands Act and mandated by the Business Professions Code, Section 11000. The review includes a wide range of

issues, including compliance with fair housing law. The review must be completed and approved before the Department of Real Estate will issue a final subdivision public report. This report is required before a real estate broker or anyone can sell the units, and each prospective buyer must be issued a copy of the report. If the CC&Rs are not approved, the Department of Real Estate will issue a "deficiency notice", requiring the CC&Rs be revised. CC&Rs are void if they are unlawful, impossible to perform or are in restraint on alienation (a clause that prohibits someone from selling or transferring his/her property). However, older subdivisions and condominium/townhome developments may contain illegal clauses that are enforced by the homeowners associations.

As California laws regarding Accessory Dwelling Units (ADUs) have substantially changed in recent years, many jurisdictions are encountering issues with homeowners associations that have CC&Rs that require HOA approval for such construction.

Homeowners Insurance Industry

Without insurance, banks and other financial institutions lend less. For example, if a company excludes older homes from coverage, lower income and minority households who may only be able to afford to buy in older neighborhoods may be disproportionately affected. Another example includes private mortgage insurance (PMI). PMI obtained by applicants from Community Reinvestment Act (CRA) protected neighborhoods is known to reduce lender risk. Redlining of lower income and minority neighborhoods can occur if otherwise qualified applicants are denied or encouraged to obtain PMI.[47]

2. National Association of REALTORS® (NAR)

The National Association of REALTORS® (NAR) has developed a Fair Housing Program to provide resources and guidance to REALTORS® in ensuring equal professional services for all people. The term REALTOR® identifies a licensed professional in real estate who is a member of the NAR; however, not all licensed real estate brokers and salespersons are members of the NAR.

Code of Ethics

Article 10 of the NAR Code of Ethics provides that "REALTORS® shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. REALTORS® shall not be parties to any plan or agreement to discriminate against a person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity."

Additionally, Standard of Practice Article 10-1 states that, "When involved in the sale or lease of a residence, REALTORS® shall not volunteer information regarding the racial, religious or ethnic composition of any neighborhood nor shall they engage in any activity which may result in panic selling, however, REALTORS® may provide other demographic information." Standard of Practice 10-3 adds that "REALTORS® shall not print, display or circulate any statement or advertisement with respect to selling or renting of a property that indicates any preference, limitations or discrimination

[47] "Borrower and Neighborhood Racial Characteristics and Financial Institution Financial Application Screening"; Mester, Loretta J; Journal of Real Estate Finance and Economics; 9 241-243; 1994

based on race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity."

Diversity Certification

NAR has created a diversity certification, "At Home with Diversity: One America" to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR "At Home with Diversity" course. The certification will signal to customers that the real estate professional has been trained on working with diversity in today's real estate markets. The coursework provides valuable business planning tools to assist real estate professionals in reaching out and marketing to a diverse housing market. The NAR course focuses on diversity awareness, building cross-cultural skills, and developing a business diversity plan.

3. California Department of Real Estate (DRE)

The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons. As noted earlier, not all licensed brokers and salespersons are members of the National or California Association of REALTORs®.

The DRE has adopted education requirements that include courses in ethics and in fair housing. To renew a real estate license, each licensee is required to complete 45 hours of continuing education, including three hours in each of the four mandated areas: Agency, Ethics, Trust Fund, and Fair Housing. The fair housing course contains information that will enable an agent to identify and avoid discriminatory practices when providing real estate services to clients.

The law requires, as part of the 45 hours of continuing education, completion of five mandatory three-hour courses in Agency, Ethics, Trust Fund Handling and Fair Housing and Risk Management. These licensees will also be required to complete a minimum of 18 additional hours of courses related to consumer protection. The remaining hours required to fulfill the 45 hours of continuing education may be related to either consumer service or consumer protection, at the option of the licensee.

4. California Association of REALTORS® (CAR)

The California Association of Realtors (CAR) is a trade association of realtors statewide. As members of organized real estate, realtors also subscribe to a strict code of ethics as noted above. CAR has recently created the position of Equal Opportunity/Cultural Diversity Coordinator. CAR holds three meetings per year for its general membership, and the meetings typically include sessions on fair housing issues. Current outreach efforts in the Southern California area are directed to underserved communities and state-licensed brokers and sales persons who are not members of the CAR.

REALTOR® Associations Serving San Diego County

REALTOR® Associations are generally the first line of contact for real estate agents who need continuing education courses, legal forms, career development, and other daily work necessities. The frequency and availability of courses varies amongst these associations, and local association membership is generally determined by the location of the broker for which an agent works. Complaints involving agents or brokers may be filed with these associations.

Monitoring of services by these associations is difficult as detailed statistics of the education/services the agencies provide or statistical information pertaining to the members is rarely available. The following associations serve San Diego County:

- Greater San Diego Association of REALTORS (SDAR)
- North County Association of REALTORS (NSDCAR)
- Pacific Southwest Association of REALTORS (PSAR)

B. Fair Housing in the Rental Housing Market

1. Rental Process

Advertising

Like with ad listings for for-sale homes, rental advertisements cannot include discriminatory references. A total of 524 rental listings were surveyed in March 2020 and 123 advertisements were found to contain potentially discriminatory language (Table 73). The problematic language typically involved references to household size, familial status, schools or children (49 ads) and pets (74 ads).

Under California's fair housing law, source of income is a protected class. It is, therefore, considered unlawful to prefer, limit, or discriminate against a specific income source for a potential homebuyer. Until 2020, source of income protection did not include Section 8 assistance. In 2019, the State passed SB 329 (effective January 1, 2020), making Section 8 and other public assistance as legitimate source of income for rents.

Rental advertisements with references to pets in San Diego County were a significant issue in the listings surveyed. Persons with disabilities are one of the protected classes under fair housing law, and apartments must allow "service animals" and "companion animals," under certain conditions. Service animals are animals that are individually trained to perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure, or performing other special tasks. Service animals are working animals, not pets. Companion animals, also referred to as assistive or therapeutic animals, can assist individuals with disabilities in their daily living and as with service animals, help disabled persons overcome the limitations of their disabilities and the barriers in their environment.

Persons with disabilities have the right to ask their housing provider to make a reasonable accommodation in a "no pets" policy in order to allow for the use of a companion or service animal. However, in the case of rental ads that specifically state "no pets," some disabled persons may not be aware of their right to ask for an exception to this rule. Because of this, a person with a disability may

see themselves as limited in their housing options and a "no pets" policy could, therefore, be interpreted as potentially discriminatory. Of the rental listings surveyed, 74 ads included language to specifically ban pets.

Table 73: Potential Discrimination in Listings of Homes for Rent

Discrimination Type	Number of Listings	Potentially Discriminatory Language
No Discriminatory Language	401	--
Disability Related	74	▪ No dogs allowed in home ▪ Only a small dog may be considered. ▪ No pets ▪ Pets are not accepted, especially dogs. ▪ Only one pet allowed, preferably small. ▪ Additional deposit for pet may be required ▪ NO PETS ALLOWED
Household Size/Family Related	49	▪ Close distance to downtown close to shopping centers freeways and schools ▪ Good for a couple and baby ▪ Its located near schools and shopping centers ▪ with our convenient location to schools ▪ Great neighborhood- close to schools! ▪ Good for a couple and baby ▪ Easy walk to some of the best schools! ▪ Located in the highly rated Poway School District ▪ Big pool and spa perfect for a family and entertaining ▪ Close to Woodland Park Middle School ▪ Big house with plenty of room for a couple wanting to expand their family

Notes:
1. Examples are direct quotes from the listings (including punctuation and emphasis).
2. Ads may contain multiple types of potentially discriminatory language.

Source: www.craigslist.org, accessed March 2020.

Responding to Ads

Differential treatment of those responding to advertisements is a growing fair housing concern. In a 2011 study conducted nationally, comprehensive audit-style experiments via email correspondence were used to test for racial discrimination in the rental housing market. This study was particularly unique because it tested for two variables – discrimination based on race and social class. By responding to online rental listings using names associated with a particular racial/ethnic group and varying message content grammatically to indicate differing levels of education and/or income (i.e. social class), researchers found that, overall, Blacks continued to experience statistically significant levels of discrimination in the rental housing market. This discrimination was even more pronounced when the housing inquiry was made to look like it originated from a Black individual of a lower social class.[48]

[48] Do Landlords Discriminate in the Rental Housing Market? Evidence from an Internet Field Experiment in U.S. cities. Andrew Hanson and Zackary Hawley. May 2011.

Viewing the Unit

Viewing the unit is the most obvious place where the potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, or judge on appearance whether a potential renter is reliable or may violate any of the rules.

In a follow up to the study discussed above, researchers developed an experiment to test for subtle discrimination. Subtle discrimination is defined as unequal treatment between groups that occurs but is difficult to quantify, and may not always be identifiable through common measures such as price differences. Researchers found that, in general, landlords replied faster and with longer messages to inquiries made from traditional "white" names. The study also found that landlords were more likely to use descriptive language, extend invitations to view a unit, invite further correspondence, use polite language, and make a formal greeting when replying to e-mail inquiries from a white home seeker.[49]

Credit/Income Check

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history/salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent. Many landlords often use credit history as an excuse when trying to exclude certain groups. Legislation provides for applicants to receive a copy of the report used to evaluate applications.

The study on subtle discrimination mentioned earlier found no statistically significant evidence of discrimination in using language related to fees, asking for employment or rental history, or requesting background information.

The Lease

Typically, the lease or rental agreement is a standard form completed for all units within the same building. However, the enforcement of the rules contained in the lease or agreement may not be standard for all tenants. A landlord may choose to strictly enforce the rules for certain tenants based on arbitrary factors, such as race, presence of children, or disability.

Lease-related language barriers can impede fair housing choice if landlords and tenants do not speak the same language. In California, applicants and tenants have the right to negotiate lease terms primarily in Spanish, Chinese, Tagalog, Vietnamese or Korean. If a language barrier exists, the landlord must give the tenant a written translation of the proposed lease or rental agreement in the language used in the negotiation before the tenant signs it.50 This rule applies to lease terms of one month or longer and whether the negotiations are oral or in writing.

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[49] Subtle Discrimination in the Rental Housing Market: Evidence from E-mail Correspondence with Landlords. Andrew Hanson, Zackary Hawley, and Aryn Taylor. September 2011.

[50] California Civil Code Section 1632(b)

Security Deposit

A security deposit is typically required. To deter "less-than-desirable" tenants, a landlord may ask for a security deposit higher than for others. Tenants may also face discriminatory treatment when vacating the units. For example, the landlord may choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear. A landlord may also require that persons with disabilities pay an additional pet rent for their service animals, a monthly surcharge for pets, or a deposit, which is also a discriminatory act.

During the Tenancy

During tenancy, the most common forms of discrimination a tenant may face are based on familial status, race, national origin, sex, or disability. Usually this type of discrimination appears in the form of varying enforcement of rules, overly strict rules for children, excessive occupancy standards, refusal to make a reasonable accommodation for handicapped access, refusal to make necessary repairs, eviction notices, illegal entry, rent increases, or harassment. These actions may be used as a way to force undesirable tenants to move on their own without the landlord having to make an eviction.

2. California Apartment Association (CAA)

The California Apartment Association has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared towards improving the approach, attitude and professional skills of on-site property managers and other interested individuals. The CCRM program consists of 31.5 hours of training that includes fair housing and ethics along with the following nine course topics:

- Preparing the Property for Market
- Professional Leasing Skills and the Application Process
- The Move-in Process, Rent Collection and Notices
- Resident Issues and Ending the Tenancy
- Professional Skills for Supervisors
- Maintenance Management: Maintaining a Property
- Liability and Risk Management: Protecting the Investment
- Fair Housing: It's the Law
- Ethics in Property Management

The CAA supports the intent of all local, State, and federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation, or national origin. Members of the CAA agree to abide by the provisions of their Code for Equal Housing Opportunity.

3. National Association of Residential Property Managers (NARPM)

The National Association of Residential Property Managers promotes a high standard of property management business ethics, professionalism and fair housing practices within the residential property management field. NARPM is an association of real estate professionals who are experienced in managing single-family and small residential properties. Members of the association adhere to a strict Code of Ethics to meet the needs of the community, which include the following duties:

- Protect the public from fraud, misrepresentation, and unethical practices of property managers.
- Adhere to the Federal Fair Housing Stature.
- Protect the fiduciary relationship of the Client.
- Treat all Tenants professionally and ethically.
- Manage the property in accordance with the safety and habitability standards of the community.
- Hold all funds received in compliance with state law with full disclosure to the Client.

NARPM offers three designations to qualified property managers and property management firms:

1. Residential Management Professional, RMP ®
2. Master Property Manager, MPM ®
3. Certified Residential Management Company, CRMC ®

Various educational courses are offered as part of attaining these designations including the following fair housing and landlord/tenant law courses:

- Ethnics (required for all members every four years)
- Habitability Standards and Maintenance
- Marketing
- Tenancy
- ADA Fair Housing
- Lead-Based Paint Law

4. Western Manufactured Housing Communities Association (WMA)

Western Manufactured Housing Communities Association (WMA) is a nonprofit organization created in 1945 for the exclusive purpose of promoting and protecting the interests of owners, operators and developers of manufactured home communities in California. WMA assists its members in the operations of successful manufactured home communities in today's complex business and regulatory environment. WMA has over 1,700 member parks located in all 58 counties of California.

WMA offers an award winning manager accreditation program as well as numerous continuing education opportunities. The Manufactured Home Community Manager (MCM) program is a manager accreditation program that provides information on effective community operations.

WMA's industry experts give managers intensive training on law affecting the industry, maintenance standards, HCD inspections, discrimination, mediation, disaster planning, and a full range of other vital subjects.

C. Fair Housing Services

In general, fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection regulations, as well as mediating disputes between tenants and landlords. This section reviews the fair housing services available in San Diego County, the nature and extent of fair housing complaints, and results of fair housing testing/audits.

1. CSA San Diego County (CSA)

The CSA San Diego County (CSA), is an agency whose mission is to actively support and promote fair housing through education and advocacy. CSA provides the following fair housing related services:

- Tenant-Landlord mediation
- Fair housing counseling and dispute mediation
- Educational fair housing seminars for tenants and landlords (English and Spanish and other languages upon request)
- Services to tenants, landlords, and apartment managers
- Real estate and rental practice discrimination audits
- Free rental housing handbooks in English, Spanish, and Arabic
- Legal services and advocacy
- Enforcement of fair housing laws through conciliation, litigation, or administrative referrals.

CSA assists residents and reports fair housing data for the cities of:

- Chula Vista
- La Mesa
- El Cajon
- Santee
- National City
- Unincorporated East County

2. Legal Aid Society of San Diego (LASSD)

The Legal Aid Society of San Diego (LASSD) provides fair housing services to guarantee equal housing opportunity for San Diego City and County residents. LASSD provides support through outreach, education, and enforcement of both federal and state fair housing laws. To receive services provided by LASSD the act of housing discrimination must have occurred within the County of San Diego. The LASSD Housing Team is the only full service resource in the County, providing counseling, direct legal intervention and in-Court representation for eligible San Diego County residents. LASSD provides the following services:

- Assist or advise eligible clients
- Educate community groups and tenants to increase awareness of tenant's rights and the workings of the judicial system
- Conduct outreach
- Assist tenants in organizing themselves to take legal action

LASSD is currently under contract with the City of San Diego to provide fair housing services. However, the agency assists residents throughout the County and the cities of:

- Carlsbad
- Encinitas
- Lemon Grove
- San Diego
- Vista
- Coronado
- Escondido
- Oceanside
- San Marcos
- San Diego County
- Del Mar
- Imperial Beach
- Poway
- Solana Beach

3. Overall Service Coverage

Overall, the region is well served by multiple agencies for fair housing services. However, residents may find it hard to navigate the service system and identify the appropriate agency for contact. A jurisdiction's contract for fair housing service providers may also change year to year. To ensure the public is well aware of available services, the SDRAFFH and local jurisdictions should update their websites and outreach materials frequently. Furthermore, consistent recordkeeping formats would assist in the compilation and analysis of fair housing data across agencies.

D. California Department of Fair Employment and Housing (DFEH)

The California Department of Fair Employment and Housing (DFEH) investigates complaints of employment and housing discrimination based on race, sex, religious creed, color, national origin, medical condition (cured cancer only), ancestry, physical or mental disability, marital status, or age (over 40 only). DFEH also investigates complaints of housing discrimination based on the above classes, as well as children/age, and sexual orientation.

DFEH established a program in May 2003 for mediating housing discrimination complaints, which is a first for the State of California and is the largest fair housing mediation program in the nation to be developed under HUD's Partnership Initiative with state fair housing enforcement agencies. The program provides California's tenants, landlords, and property owners and managers with a means of resolving housing discrimination cases in a fair, confidential, and cost-effective manner. Key features of the program are: 1) program is free of charge to the parties; and 2) mediation takes place within the first 30 days of the filing of the complaint, often avoiding the financial and emotional costs associated with a full DFEH investigation and potential litigation.

After a person calls in for a complaint, an interview takes place, documentation is obtained and issues are discussed to decide on the course to proceed. Mediation/conciliation is offered as a viable alternative to litigation. If the mediation/conciliation is successful, the case is closed after a brief case

follow-up. If the mediation/conciliation is unsuccessful, the case is then referred to DFEH or HUD. If during case development further investigation is deemed necessary, testing may be performed. Once the investigation is completed, the complainant is advised of the alternatives available in proceeding with the complaint, which include: mediation/ conciliation, administrative filing with HUD or DFEH, referral for consideration to the Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, or referral to a private attorney for possible litigation.

E. Fair Housing Statistics

As part of the enforcement and tracking services provided by the above mentioned fair housing service providers, intake and documentation of all complaints and inquiries result in the compilation of statistics provided to each jurisdiction in the form of quarterly and annual reports. However, because the various agencies that provide fair housing services in the County each have their own intake forms, the amount and specificity of available fair housing data is highly uneven throughout the County and difficult to use for regional comparisons and analyses. The following sections summarize fair housing statistics in San Diego County using available data and sources.

1. CSA San Diego County (CSA)

Housing Discrimination Complaints

Between FY 2014 and FY 2018, CSA provided fair housing services to approximately 1,000 San Diego County residents per year—for a total of 6, 276 clients over the five-year period (Table 74). The majority of CSA's clients during this period came from El Cajon (35 percent), Chula Vista (21 percent), and the unincorporated County.

Table 74: CSA Clients Served (FY 2014-2018)*

Jurisdiction	Clients Served FY 2014-2019	% of Total
Carlsbad	192	3%
Chula Vista	1,329	21%
El Cajon	2,191	35%
La Mesa	611	10%
National City	688	11%
Santee	276	4%
Unincorporated	989	16%
Total Clients	**6,276**	**100%**

Source: CSA San Diego, February 2020.
*Data provided only for FY 2014 and FY 2015 for Carlsbad and the Unincorporated communities.

Statistics reported throughout San Diego County indicate that low-income persons, regardless of race, are the most frequently impacted by fair housing issues. The vast majority of CSA's clients (95 percent) between FY 2014 and FY 2018 were either extremely low or very low income (Table 75). Consistent with the demographic makeup of the region, White residents represented a substantial

proportion of clients served (41 percent, Table 76). However, there is some indication that fair housing issues disproportionately affect certain racial/ethnic groups. For example, Black residents made up less than an average 4.1 percent of the population in the cities that CSA serves (Table 76), but represented 10 percent of fair housing clients served.

Table 75: CSA Clients Served by Income Level (FY 2014-2018)*

Income	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Extremely Low Income (<30% AMI)	1,410	1,474	890	843	587	5,204	83%
Low Income (<50% AMI)	152	111	104	113	294	774	**12%**
Moderate Income (<80% AMI)	31	35	15	13	68	162	**3%**
>80% AMI	40	24	24	10	38	136	**2%**
Total Clients	**1,633**	**1,644**	**1,033**	**979**	**987**	**6,276**	**100%**

Source: CSA San Diego, February 2020.
*Data provided only for FY 2014 and FY 2015 for Carlsbad and the Unincorporated communities

Table 76: CSA Clients Served by Race/Ethnicity (FY 2014-2018)*

Income	2014-15	2015-16	2016-17*	2017-18	2018-19	Total	Percent
Race							
Hispanic	527	561	423	395	486	2,392	**38%**
Non- Hispanic	1,106	1,083	610	584	500	3,883	**62%**
Total Clients	**1,633**	**1,644**	**1,033**	**979**	**986**	**6,275**	**100%**
Ethnicity							
White	757	741	402	373	269	**2,542**	**41%**
Black/African American	175	171	90	100	92	**628**	**10%**
Asian	27	32	45	38	22	**164**	**3%**
Hawaiian/Pacific Islander	32	18	5	19	75	**149**	**2%**
American Indian/Alaska Native	7	5	2	44	106	**164**	**3%**
Other/Multi-Racial	635	677	489	405	423	**2,629**	**42%**
Total Clients	**1,633**	**1,644**	**1,033**	**979**	**987**	**6,276**	**100%**

Source: CSA San Diego, February 2020.
*Data provided only for FY 2014 and FY 2015 for Carlsbad and the Unincorporated communities

Education and Outreach Efforts

CSA conducts regular workshops and educational presentations, including general Fair Housing workshops and those specifically held to educate and address the needs of small property owners. Workshops and presentations cover a wide range of issues including tenant and landlord rights and responsibilities, notices to vacate, substandard conditions, and foreclosures. From FY 2014 to FY 2018, CSA conducted over 424 fair housing events in Carlsbad, Chula Vista, El Cajon, La Mesa, National City, San Diego, Santee, and unincorporated communities like East County and Bonita. A list of the events and location of events hosted by CSA from FY 2015 to FY 2018 is found in Appendix C.

Additionally, as members of the Newcomer Network, which provides resources to new and non-English speaking immigrants/refugees, CSA commits to providing services to the local immigrant community. These include helping develop and distribute resource guides for this community such as the English as a Second Language (ESL) Resource Guide, and being a resource for landlord/tenants' rights, hate crime prevention and immigration advocacy. To remain involved and up-to-date on issues concerning fair housing, CSA attends the quarterly meetings and serves on the steering committee of the San Diego Regional Alliance for Fair Housing (SDRAFFH). During these meetings CSA and other fair housing providers discuss challenges, resources and strategies for addressing fair housing in San Diego County.

2. Legal Aid Society San Diego (LASSD)

Housing Discrimination Complaints

Between FY 2014 and FY 2018, LASSD served over 19,000 San Diego County residents (Table 77). The majority of LASSD client households during this five-year time period resided in the City of San Diego (53 percent), El Cajon (nine percent) and Oceanside (eight percent).

Table 77: LASSD- Clients Served (FY 2014-2018)

Jurisdiction	Clients Served FY 2014-2019	% of Total
Carlsbad	323	2%
Chula Vista	1,494	8%
Coronado	38	0%
Del Mar	17	0%
El Cajon	1,646	9%
Encinitas	116	1%
Escondido	861	4%
Imperial Beach	341	2%
La Mesa	597	3%
Lemon Grove	310	2%
National City	557	3%
Oceanside	1,452	8%
Poway	81	0%
San Diego	10,303	53%
San Marcos	287	1%
Santee	224	1%
Solana Beach	21	0%
Vista	658	3%
Total Clients	**19,326**	**100%**

Source: Legal Aid Society San Diego, February 2020.

The vast majority of clients served by LASSD were lower income (87 percent) and white (66 percent) (Table 77 and Table 78). Based on the data reported by LASSD, fair housing issues disproportionately affected some San Diego County residents. For example, Black residents made up less than five percent of the total County population, yet represented 24 percent of fair housing complainants.

Table 78: LASSD- Clients Served by Income Level (FY 2014-2018)*

Income	2014-15	2015-16	2016-17	2017-18	2018-19*	Total	Percent
Extremely Low Income (<30% AMI)	5,603	5,177	5,187	5,256	2,542	**23,765**	**54%**
Low Income (<50% AMI)	3,193	3,233	3,214	2,985	1,541	**14,166**	**32%**
Moderate Income (<80% AMI)	653	813	875	682	362	**3,385**	**8%**
>80% AMI	459	467	544	579	315	**2,364**	**5%**
Total Clients	**9,908**	**9,690**	**9,820**	**9,502**	**4,760**	**43,680**	**100%**

Source: LASSD, February 2020.
* Only includes data for Q1 and Q2 of FY2018-19

Table 79: LASSD- Clients Served by Race/Ethnicity (FY 2014-2018)

Race and Ethnicity	2014-15	2015-16	2016-17	2017-18*	2018-19	Total	Percent
Race							
Hispanic	1,138	1,134	1,160	1,144	1,231	**5,807**	**29%**
Non- Hispanic	2,673	2,655	2,854	2,860	2,977	**14,019**	**71%**
Total Clients	**3,811**	**3,789**	**4,014**	**4,004**	**4,208**	**19,826**	**100%**
Ethnicity							
White	2,532	2,532	2,651	2,610	2,782	**13,107**	**66%**
Black/African American	897	926	980	970	968	**4,741**	**24%**
Asian	152	141	159	137	117	**706**	**4%**
Hawaiian/Pacific Islander	0	0	0	0	0	**0**	**0%**
American Indian/ Alaska Native	33	51	38	54	50	**226**	**1%**
Other/Multi-Racial	197	139	186	238	291	**1,051**	**5%**
Total Clients	**3,811**	**3,789**	**4,014**	**4,009**	**4,208**	**19,831**	**100%**

Source: LASSD, February 2020.

Education and Outreach Efforts

LASSD works to stop housing discrimination, ensuring equal housing opportunities for all people in the City and County of San Diego; through outreach, education, and enforcement of Federal and State Fair Housing Laws. They provide free help for those who qualify that are having housing problems or questions about their rights as a tenant, as well as, those who have questions about their security deposits.

LASSD also meets monthly with the City of San Diego and Housing Opportunities Collaborative in order to evaluate service gaps and to ensure an adequate level of service is available to all residents. In addition, LASSD has established a Fair Housing Hotline to ensure its Fair Housing services are readily

available to the community and that a resident may promptly report any act of housing discrimination that may have occurred. Walk-in services are also offered at three office locations in San Diego County- Southeast, Midtown, and North County.

F. Fair Housing Testing

The purpose of fair housing testing is to determine if, and to what extent, discriminatory business practices exist in apartment rental housing and related markets. In response to the recommendation from the previous AI, some jurisdictions have begun to conduct fair housing testing routinely. Other jurisdictions contracted for fair housing testing for the purpose of this AI report in order to provide additional information on potential housing discrimination in their communities. However, it should be noted that since fair housing testing was not conducted consistently and systematically by all jurisdictions, more findings of discriminatory practices in one community that conducts regular fair housing tests cannot be interpreted as having more extensive housing discrimination, compared to other communities that have not conducted testing as frequently.

1. Methodology

Methodologies may vary, but generally, testing involves volunteer testers screened for appropriateness and then trained. Training may include an overview and history of fair housing laws, methodology of testing, and reinforcement of the qualities needed in a tester. Those qualities include objectivity, reliability, flexibility and the ability to maintain confidentiality throughout the project. A practice test and/or role-playing a site visit are also included to assure that testers are fully prepared. The project supervisor will find apartment vacancies by viewing advertisements on Craig's List, For Rent Magazine, other rental guides and online resources. A matched pair of testers, one representing the variable being tested, and the other as a control are then assigned and given their identity for each project.

Legal Aid Society and CSA San Diego provided the results of Fair Housing Testing between FY 2015 and FY 2018 in the cities of Chula Vista, Carlsbad, El Cajon, Encinitas, Escondido, Imperial Beach, La Mesa, National City, Oceanside, San Diego City, Santee, Vista, and San Diego County. All testing was done in the rental market. Detailed breakdown of tests by jurisdiction and testing variables can be found in Table 9.

2. Testing Results

Chula Vista: Between FY 2015 and FY 2020, Chula Vista tested for discrimination on the basis of race, familial status, disability, and gender. Of the eight sites tested, one showed differential treatment on the basis of race, four were inconclusive, and three showed no differential treatment.

Carlsbad: Between FY 2017 and FY 2018, Carlsbad tested for discrimination on the basis of disability, familial status, sexual orientation, and race. Of the 47 sites tested, four showed unequal treatment to the potential renter, three on the basis of disability (reasonable accommodation) and one on the basis of sexual orientation.

El Cajon: El Cajon tested for discrimination based on familial status, race, and gender. Of the eight sites tested, five showed differential treatment; three due to familial status and two due to race.

Encinitas: In Encinitas, during tests conducted in FY 2016 through FY 2018, only one out of 13 sites showed some disparity in treatment when testing for sexual orientation.

Escondido: Between FY 2016 and FY 2018, 53 sites were tested in Escondido for discrimination on the basis of disability, familial status, sexual orientation, and race. Of the 53 tests, eight showed disparate treatment. Five showed unequal treatment when testing for disability (reasonable accommodation) and three showed unequal treatment on the basis of sexual orientation.

Imperial Beach: In FY 2020, Imperial Beach tested for discrimination based on national origin at one site and showed disparate treatment.

La Mesa: La Mesa tested for discrimination based on disability and race at two sites. The site tested for race showed unequal treatment and the site tested for disability was inconclusive.

National City: In FY 2020, National City tested for discrimination based on disability, national origin and race. Of the six sites tested, three showed unequal treatment; one based on national origin and two based on race.

Oceanside: Oceanside tested for discrimination based on disability, familial status, sexual orientation, and race. Of the 47 sites tested, eight sites showed disparate treatment; six due to disability (reasonable accommodation) and two due to familial status.

San Diego City: The City of San Diego conducted a total of 134 audit tests between FY 2016 and FY 2020. The following variables were tested in the rental housing market: disability (reasonable accommodation and reasonable modification), familial status, national origin, race, and religion. When testing for discrimination in San Diego, it was more likely to find disparate treatment requesting reasonable accommodations. Of the 18 sites that had disparate treatment, 12 of them were due to reasonable accommodations. Additionally, three sites had unequal treatment due to familial status and three due to national origin.

San Marcos: Of the 28 audit tests conducted in the City of San Marcos between FY 2016 through FY 2018, two sites had discriminatory treatment- one based on sexual orientation and one based on race. The City also tested for familial status and disability (reasonable accommodation) but no discriminatory treatment was found.

Vista: In the 43 fair housing audits conducted in the City of Vista, four variables were tested: disability (reasonable accommodation and reasonable modification), sexual orientation, and race. The tests found that individuals were discriminated against on the basis of disability (reasonable accommodation) (two cases) and race (one case).

Santee: In FY 2020, Santee tested for discrimination based on national origin and race at two sites. The site tested for race showed differential treatment.

San Diego Urban County: Testing was conducted in the County with a total of 118 sites tested for familial status, race, and disability (reasonable accommodation). Disparate treatment was found at 16 sites for all variables: five cases for familial status, six cases for race, and five cases for disability.

Table 80: Fair Housing Audit Testing FY 2015-FY 2020

City	FY	Test Variable	Test Market	Total # of Sites	Findings					
					Differential Treatment		Inconclusive		No Differential Treatment	
					Total	%	Total	%	Total	%
Chula Vista	2015	Race	Rental	3	1	33%	0	0%	2	67%
	2020	Familial Status	Rental	1	0	0	1	100%	0	0
	2020	Dis-RA	Rental	3	0	0	2	66%	1	33%
	2020	Gender	Rental	1	0	0	1	100%	0	0
	Total			**8**	**1**	**13%**	**4**	**50%**	**3**	**38%**
Carlsbad	2017	Dis-RA	Rental	15	1	4%	1	4%	13	54%
	2017	Familial Status	Rental	1	0	0%	0	0%	1	4%
	2017	Sexual Orientation	Rental	8	1	4%	0	0%	7	29%
	2018	Dis-RA	Rental	15	2	9%	3	13%	10	43%
	2018	Dis-RM	Rental	1	0	0%	0	0%	1	4%
	2018	Race	Rental	7	0	0%	0	0%	7	30%
	Total			**47**	**4**	**9%**	**4**	**9%**	**39**	**83%**
El Cajon	2020	Familial Status	Rental	5	3	60%	2	40%	0	0%
	2020	Race	Rental	2	2	100%	0	0%	0	0%
	2020	Gender	Rental	1	0	0%	1	100%	0	0%
	Total			**8**	**5**	**63%**	**3**	**38%**	**0**	**0%**
Encinitas	2016	Dis-RA	Rental	1	0	0%	0	0%	1	25%
	2016	Familial Status	Rental	3	0	0%	0	0%	3	75%
	2017	Dis-RA	Rental	1	0	0	0	0	1	0.25
	2017	Sexual Orientation	Rental	3	1	0.25	0	0	2	0.5
	2018	Dis-RA	Rental	3	0	0	0	0	3	0.6
	2018	Race	Rental	2	0	0	0	0	2	0.4
	Total			**13**	**1**	**8%**	**0**	**0%**	**12**	**92%**
Escondido	2016	Dis-RA	Rental	10	0	0%	1	7%	9	60%

Table 80: Fair Housing Audit Testing FY 2015-FY 2020

City	FY	Test Variable	Test Market	Total # of Sites	Findings					
					Differential Treatment		Inconclusive		No Differential Treatment	
					Total	%	Total	%	Total	%
	2016	Familial Status	Rental	3	0	0%	0	0%	3	20%
	2016	Familial Status	Rental	2	0	0%	1	7%	1	7%
	2017	Dis-RA	Rental	8	2	11%	0	0%	6	32%
	2017	Sexual Orientation	Rental	11	3	16%	0	0%	8	42%
	2018	Dis-RA	Rental	7	3	16%	0	0%	4	21%
	2018	Dis-RM	Rental	5	0	0%	0	0%	5	26%
	2018	Race	Rental	7	0	0%	0	0%	7	37%
	Total			**53**	**8**	**15%**	**2**	**4%**	**43**	**81%**

Table 80: Fair Housing Audit Testing FY 2015-FY 2020

City	FY	Test Variable	Test Market	Total # of Sites	Findings					
					Differential Treatment		Inconclusive		No Differential Treatment	
					Total	%	Total	%	Total	%
Imperial Beach	2020	National Origin	Rental	1	1	100%	0	0%	0	0%
	Total			**1**	**1**	**1**	**0**	**0%**	**0**	**0%**
La Mesa	2020	Dis-RA	Rental	1	0	%	1	100%	0	%
	2020	Race	Rental	1	1	100%	0	0%	0	0%
	Total			**2**	**1**	**50%**	**1**	**50%**	**0**	**0%**
National City	2020	Dis-RA	Rental	1	0	0%	0	0%	1	100%
	2020	National Origin	Rental	1	1	100%	0	0%	0	0%
	2020	Race	Rental	4	2	50%	2	50%	0	0%
	Total			**6**	**3**	**50%**	**2**	**33%**	**1**	**17%**
Oceanside	2016	Dis-RA	Rental	10	2	13%	2	13%	6	40%
	2016	Familial Status	Rental	4	1	7%	0	0%	3	20%
	2016	Familial Status	Rental	1	1	7%	0	0%	0	0%
	2017	Dis-RA	Rental	8	3	19%	0	0%	5	31%
	2017	Sexual Orientation	Rental	8	0	0%	0	0%	8	50%
	2018	Dis-RA	Rental	6	1	6%	1	6%	4	25%
	2018	Dis-RM	Rental	5	0	0%	0	0%	5	31%
	2018	Race	Rental	5	0	0%	0	0%	5	31%
	Total			**47**	**8**	**17%**	**3**	**6%**	**36**	**77%**
San Diego City	2016	Dis-RA	Rental	27	4	9%	6	13%	17	36%
	2016	Familial Status	Rental	14	**0**	0%	3	6%	11	23%
	2016	Familial Status	Rental	6	1	2%	2	4%	3	6%
	2017	Dis-RA	Rental	21	3	14%	1	5%	17	81%
	2018	Dis-RA	Rental	24	4	9%	3	7%	17	37%
	2018	Dis-RM	Rental	1	0	0%	0	0%	1	2%

Table 80: Fair Housing Audit Testing FY 2015-FY 2020

City	FY	Test Variable	Test Market	Total # of Sites	Findings					
					Differential Treatment		Inconclusive		No Differential Treatment	
					Total	%	Total	%	Total	%
	2018	National Origin	Rental	21	1	2%	0	0%	20	43%
	2019	Familial Status	Rental	3	0	0%	3	100%	0	0%
	2019	Race	Rental	1	0	0%	1	100%	0	0%
	2019	Religion	Rental	2	0	0%	2	100%	0	0%
	2019	National Origin	Rental	3	2	66%	1	33%	0	0%
	2020	Familial Status	Rental	3	1	33%	2	66%	0	0%
	2020	Dis-RA	Rental	1	1	100%	0	0%	0	0%
	2020	Race	Rental	3	0	0%	3	100%	0	0%
	2020	Familial Status	Rental	4	1	25%	3	75%	0	0%
	Total			**134**	**18**	**13%**	**30**	**22%**	**86**	**64%**
San Marcos	2016	Familial Status	Rental	4	0	0%	0	0%	4	80%
	2016	Familial Status	Rental	1	0	0%	1	20%	0	0%
	2017	Dis-RA	Rental	5	0	0%	2	20%	3	30%
	2017	Sexual Orientation	Rental	5	1	10%		0%	4	40%
	2018	Dis-RA	Rental	9	0	0%	0	0%	9	69%
	2018	Race	Rental	4	1	8%	0	0%	3	23%
	Total			**28**	**2**	**7%**	**3**	**11%**	**23**	**82%**
Vista	2016	Dis-RA	Rental	9	0	0%	2	22%	7	78%
	2017	Dis-RA	Rental	8	2	13%		13%	6	13%
	2017	Sexual Orientation	Rental	8	0	13%	1	13%	7	13%
	2018	Dis-RA	Rental	10	0	0%	0	0%	10	50%
	2018	Dis-RM	Rental	2	0	0%	0	0%	2	10%
	2018	Race	Rental	8	1	5%	0	0%	7	35%
	Total			**45**	**3**	**7%**	**3**	**7%**	**39**	**87%**

Table 80: Fair Housing Audit Testing FY 2015-FY 2020

City	FY	Test Variable	Test Market	Total # of Sites	Findings					
					Differential Treatment		Inconclusive		No Differential Treatment	
					Total	%	Total	%	Total	%
Santee	2020	National Origin	Rental	1	0	0%	1	%	0	0%
	2020	Race	Rental	1	1	100%	0	0%	0	0%
	Total			**2**	**1**	**50%**	**1**	**50%**	**0**	**0%**
San Diego County	2016	Familial Status	Rental	40	5	13%	10	25%	25	63%
	2017	Race	Rental	37	6	16%	4	11%	27	73%
	2018	Dis-RA	Rental	39	5	12%	0	0%	34	83%
	2018	Familial Status	Rental	1	0	0%	0	0%	1	2%
	2018	Race	Rental	1	0	0%	0	0%	1	2%
	Total			**118**	**16**	**14%**	**14**	**12%**	**88**	**75%**

Note: Dis-RA refers to disability- reasonable accommodation (RA) and Dis-RM refers to disability- reasonable modification (RM).
Source: LASSD, February 2020; CSA San Diego, May 2020.

G. U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (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. From October 1, 2014 to September 30, 2019, 414 fair housing complaints in San Diego County were filed with HUD (Table 10). About 44 percent of complaints filed were from residents of the City of San Diego. A fair number of complaints were also filed from residents of Oceanside (11 percent) and Chula Vista (seven percent).

Overall, disability-related discrimination was the most commonly reported—comprising 53 percent of all cases (Table 11). Complaints concerning race (12 percent), retaliation (10 percent), and familial status (nine percent) were also regularly reported. Half of all complaints filed (50 percent or 206 cases) were deemed to have no cause and another 28 percent (115 cases) were conciliated or settled.

Table 81: Basis for Discrimination of Fair Housing Cases filed with HUD (FY 2014-2018)*

Jurisdiction	Color	Disability	Familial Status	National Origin	Race	Religion	Retaliation	Sex	Total	# of Cases	%
Carlsbad	1	11	1	0	3	1	0	0	17	14	3.4%
Chula Vista	1	18	5	3	2	1	4	1	35	29	7.0%
Coronado	0	2	0	0	0	0	0	0	2	2	0.5%
Del Mar	0	1	0	0	0	1	0	0	2	2	0.5%
El Cajon	0	10	10	6	5	3	2	3	39	25	6.0%
Encinitas	0	4	1	0	0	0	0	0	5	5	1.2%
Escondido	0	9	0	1	3	0	2	0	15	13	3.1%
Imperial Beach	0	4	1	0	2	0	2	1	10	7	1.7%
La Mesa	0	7	0	1	1	0	2	1	12	9	2.2%
Lemon Grove	0	3	0	0	0	0	0	0	3	3	0.7%
National City	0	10	0	0	1	0	2	0	13	11	2.7%
Oceanside	0	40	5	0	4		4	3	56	47	11.4%
Poway	0	2	0	0	0	2	0	1	5	4	1.0%
San Diego	1	122	14	17	30	4	24	24	236	183	44.2%
San Marcos	0	4	0	1	4	0	1	0	10	9	2.2%
Santee	0	6	1	0	1	0	2	1	11	9	2.2%
Solana Beach	0	3	0	1	0	0	1	0	5	4	1.0%
Vista	0	6	2	2	1	0	0	0	11	10	2.4%
Unincorporated	1	19	6	0	6		6	5	43	28	6.8%
Total	**4**	**281**	**46**	**32**	**63**	**12**	**52**	**40**	**530**	**414**	**100.0%**
%	**0.8%**	**53.0%**	**8.7%**	**6.0%**	**11.9%**	**2.3%**	**9.8%**	**7.5%**	**100.0%**		

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

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

	Dismissed for Lack of Jurisdiction	Unable to Locate Compliant	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)

H. Hate Crimes

Hate crimes are crimes that are committed because of a bias against race, religion, disability, ethnicity, or sexual orientation. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting Program collects statistics on these incidents.

To a certain degree, hate crimes are an indicator of the environmental context of discrimination. These crimes should be reported to the Police or Sheriff's department. On the other hand, a hate incident is an action or behavior that is motivated by hate but is protected by the First Amendment right to freedom of expression. Examples of hate incidents can include name-calling, epithets, distribution of hate material in public places, and the display of offensive hate-motivated material on one's property. The freedom guaranteed by the U.S. Constitution, such as the freedom of speech, allows hateful rhetoric as long as it does not interfere with the civil rights of others. Only when these incidents escalate can they be considered an actual crime.

Statistics compiled by the FBI found that a total of 479 hate crimes were committed in San Diego County from 2013 to 2018 (Table 83). Race-based hate crimes were the most common (54 percent); though, hate crimes motivated by sexual orientation (26 percent), and religion (19 percent) were also commonly reported.

During the six-year period from 2013 to 2018, the incidence of reported hate crimes in all of San Diego County was less than one per 1,000 people (0.15 per 1,000 persons). This figure has also substantially declined from a decade earlier (the seven-year period from 2007 to 2013) when the incidence of hate crimes in the County was 0.23 per 1,000 persons. Hate crime statistics varied somewhat from jurisdiction to jurisdiction—with the cities of Del Mar (zero incidents), Solana Beach (zero incidents), and Coronado (0.04) having the lowest incidence rates and the cities of Imperial Beach (0.22), Escondido (0.17), Oceanside (0.16), and San Diego (0.16) having the highest incidence rates. It should be noted that these statistics may also reflect a higher incidence of reporting crime in certain communities, which consistently have very low overall crime rates.

Table 83: Hate Crimes (FY 2013-2018)

Jurisdiction	Race/ Ethnicity/ Ancestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total	%	Incidence
Urban County Cities									
Coronado	0	1	0	0	0	0	1	0.2%	0.04
Del Mar	0	0	0	0	0	0	0	0.0%	0.00
Imperial Beach	4	1	1	0	0	0	6	1.3%	0.22
Lemon Grove	2	0	1	0	0	0	3	0.6%	0.11
Poway	0	2	1	0	0	0	3	0.6%	0.06
Solana Beach	0	0	0	0	0	0	0	0.0%	0.00
Entitlement Jurisdictions									
Carlsbad	10	5	1	0	0	0	16	3.3%	0.14
Chula Vista	8	3	6	0	0	0	17	3.5%	0.06
El Cajon	9	0	4	0	0	0	13	2.7%	0.12
Encinitas	4	4	0	0	0	0	8	1.7%	0.13
Escondido	23	2	1	0	0	0	26	5.4%	0.17
La Mesa	4	1	1	0	0	0	6	1.3%	0.10
National City	5	0	2	0	0	0	7	1.5%	0.11
Oceanside	19	5	5	0	0	0	29	6.1%	0.16
San Diego	102	51	72	0	0	7	232	48.4%	0.16
San Marcos	3	2	1	0	0	0	6	1.3%	0.06
Santee	5	1	2	0	0	0	8	1.7%	0.14
Vista	9	2	4	0	0	0	15	3.1%	0.15
Unincorporated	50	9	24	0	0	0	83	17.3%	0.02
Total County	257	89	126	0	0	7	479	100.0%	0.14
Percentage	53.7%	18.6%	26.3%	0.0%	0.0%	1.5%	100.0%		

Source: U.S. Department of Justice Federal Bureau of Investigation, Crime Statistics, 2013-2018.

CHAPTER 7 FAIR HOUSING ACTION PLAN

AN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

This chapter builds upon the previous analyses and presents a list of specific actions jurisdictions in the region are planning to undertake in order to address the impediments. Impediments and recommendations are grouped in the following categories:

A. Regional Impediments

The following is a summary of recommended actions to address regional impediments. Impediments and recommended actions are modified to reflect current conditions, feasibility, and past efforts.

1. Lending and Credit Counseling

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

- 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 Imperial Beach (-30 percent), Vista (-32 percent), and Escondido (-33 percent).
- Approval rates for Black and Hispanic applicants were well below the approval rates for White and Asian applicants in the same income groups. 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.
- Black and Hispanic applicants continued to get higher-priced (subprime) loans more frequently than White and Asian applicants.

Recommended Actions	Timeframe												
	Carlsbad	Chula Vista	Encinitas	El Cajon	Escondido	La Mesa	National City	Oceanside	San Diego City	San Diego Urban County	San Marcos	Santee	Vista
Coordinate with the Reinvestment Task Force to receive annual reporting from the Task Force on progress in outreach and education.	Annually												

2. Overconcentration of Housing Choice Vouchers

<u>Impediments:</u> Due to the geographic disparity in terms of rents, concentrations of Housing Choice Voucher use have occurred.

- El Cajon and National City continue to experience high rates of voucher use.

Recommended Actions	Timeframe												
	Carlsbad	Chula Vista	Encinitas	El Cajon	Escondido	La Mesa	National City	Oceanside	San Diego City	San Diego Urban County	San Marcos	Santee	Vista
Expand the affordable housing inventory, as funding allows.	Ongoing												
Promote the Housing Choice Voucher program to rental property owners, in collaboration with the various housing authorities in the region.	Ongoing												
Increase outreach and education, through the fair housing service providers, regarding the State's new Source of Income Protection (SB 329 and SB 222), defining Housing Choice Vouchers as legitimate source of income for housing. These new housing laws went into effect January 1, 2020.	By the end of 2020, and annually thereafter												

3. Housing Options

<u>Impediments</u>: Housing choices for special needs groups, especially persons with disabilities, are limited.

- Housing options for special needs groups, especially for seniors and persons with disabilities, are limited. Affordable programs and public housing projects have long waiting lists.
- Approximately 23 percent of the applicant-households on the waiting list for Public Housing and 22 percent on the waiting list for Housing Choice Vouchers include one disabled member.
- Approximately 10 percent of the applicant-households on the waiting list for Public Housing and 11 percent on the waiting list for Housing Choice Vouchers are seniors.

Recommended Actions	Timeframe												
	Carlsbad	Chula Vista	Encinitas	El Cajon	Escondido	La Mesa	National City	Oceanside	San Diego City	San Diego Urban County	San Marcos	Santee	Vista
Increase housing options for special needs populations, including persons with disabilities, senior households, families with children, farmworkers, the homeless, etc. Specifically, amend the Zoning Code to address the following pursuant to new State laws: ▪ Low Barrier Navigation Center (AB 101) ▪ Supportive Housing (AB 139) ▪ Emergency Shelter for the Homeless (AB 139) ▪ Accessory Dwelling Units (ABs 68, 671, 881, and 587 and SB 13) See actions under Jurisdictional - Specific Impediments – Public Policies.	Review zoning provisions as part of the 6th cycle Housing Element update, due April 15, 2021												
Encourage universal design principles in new housing developments.	Ongoing												
Educate city/county building, planning, and housing staff on accessibility requirements	Ongoing												
Encourage inter-departmental collaboration	Ongoing												

4. Enforcement

Impediments: Enforcement activities are limited.

- Fair housing services focus primarily on outreach and education; less emphasis is placed on enforcement.
- Fair housing testing should be conducted regularly.

Recommended Actions	Timeframe												
	Carlsbad	Chula Vista	Encinitas	El Cajon	Escondido	La Mesa	National City	Oceanside	San Diego City	San Diego Urban County	San Marcos	Santee	Vista
Provide press releases to local medias on outcomes of fair housing complaints and litigation.	Semi-annually												
Support stronger and more persistent enforcement activity by fair housing service providers.	Ongoing												
Conduct random testing on a regular basis to identify issues, trends, and problem properties. Expand testing to investigate emerging trends of suspected discriminatory practices	Conduct testing every other year or as warranted by emerging trends												

5. Outreach and Education

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

- Increasingly fewer people rely on the newspapers to receive information. Public notices and printed flyers are costly and ineffective means to reach the community at large.
- Frequent workshops with targeted population should be conducted to allow for meaningful discussions and dissemination of useful information.

Recommended Actions	Timeframe												
	Carlsbad	Chula Vista	Encinitas	El Cajon	Escondido	La Mesa	National City	Oceanside	San Diego City	San Diego Urban County	San Marcos	Santee	Vista
Education and outreach activities to be conducted as a multi-media campaign, including social media such as Facebook, Twitter, and Instagram, as well as other meeting/discussion forums such as chat rooms and webinars.	Ongoing												
Involve neighborhood groups and other community organizations when conducting outreach and education activities.	Ongoing												
Include fair housing outreach as part of community events.	Ongoing												

6. Racial Segregation and Linguistic Isolation

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

- 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.
- Within San Diego County, there are RECAPs (Racially/Ethnically Concentrated Areas of Poverty) 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.

Recommendations	Timeframe												
	Carlsbad	Chula Vista	Encinitas	El Cajon	Escondido	La Mesa	National City	Oceanside	San Diego City	San Diego Urban County	San Marcos	Santee	Vista
Diversify and expand the housing stock to accommodate the varied housing needs of different groups.	As part of the 6th cycle Housing Element update, evaluate the community's varied housing needs and adjust housing and land use policies to accommodate the community's Regional Housing Needs Assessment (RHNA), by April 15, 2021												
Promote equal access to information for all residents. Update LEP plan to reflect demographic changes in community per Executive Order 13166 of August 11, 2000.	Periodically but at least when new Census data becomes available												

B. Jurisdiction-Specific Impediments

The following is a list of actions that will be taken to address jurisdiction-specific impediments carried over from previous AIs. Impediments and recommended actions are modified to reflect current conditions, feasibility, and past efforts.

1. Public Policies

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

- **Recent Changes to Density Bonus Law:** The most recent changes to California density bonus law went into effect in January 2020. Because of this, while most San Diego County jurisdictions do include regulations allowing for density bonuses, jurisdictions must review their regulations to ensure continued compliance with state law.
- **Definition of Family:** The zoning ordinance of Solana Beach contains a definition of family that may be considered discriminatory.
- **Accessory Dwelling Units:** Most jurisdictions have not yet amended the ADU provisions to comply with the recent changes to State law (e.g., SB 13, AB 68, AB 881, AB 587, and AB 671).
- **Emergency Shelters:** The City of Poway does not have adequate provisions for emergency shelters in their zoning ordinance. The currently adopted Housing Element for Poway acknowledges the need to update the zoning ordinance, but no amendment has been completed at this time.

  Furthermore, recent changes to State law (AB 101 and AB 139) require additional revisions to local zoning regulations regarding the provision of Low Barrier Navigation Centers (LBNC) and emergency shelters. Specifically AB 139 requires the assessment of shelter needs be based on the most recent Point-in-Time Count and the parking standards for shelters be based on staffing levels.
- **Transitional and Supportive Housing:** The County of San Diego, La Mesa, and Vista do not fully comply with all of the requirements of SB 2. Furthermore, recent changes to State law AB 139 requires supportive housing to be permitted by right where multi-family and mixed uses are permitted. Jurisdictions should revise the zoning ordinance to specifically state supportive housing as a by-right use.
- **Farmworker Housing/Employee Housing:** Some jurisdictions allow employee housing for six or fewer employees but have not updated their zoning ordinance to permit the use in accordance with the California Housing Act.

Recommended Actions	Zoning Amendments Needed						
	Density Bonus	Accessory Dwelling Units	Emergency Shelters Zoning	LBNC and ES Capacity and Parking Standards	Transitional/ Supportive Housing	Farmworker Employee Housing	Definition of Family
Carlsbad	■	■		■	■		
Chula Vista	■	■		■	■		
Coronado	■	■		■	■	■	
Del Mar	■	■		■	■	■	
El Cajon	■	■		■	■		
Encinitas	■	■		■			
Escondido	■	■		■	■	■	
Imperial Beach	■	■		■	■		
La Mesa	■	■		■	■	■	
Lemon Grove	■	■		■	■	■	
National City	■	■		■	■	■	
Oceanside	■	■		■	■	■	
Poway	■	■	■	■	■	■	
San Diego City	■	■		■	■	■	
San Diego County	■	■		■	■	■	
San Marcos	■	■		■	■	■	
Santee	■	■		■	■	■	
Solana Beach	■	■		■	■	■	■
Vista	■	■		■	■		