Appendix 6-I:
Affirmatively Furthering Fair Housing

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AFFIRMATIVELY FURTHERING FAIR HOUSING

INTRODUCTION AND OVERVIEW OF AB 686

Assembly Bill (AB) 686, passed in 2017, requires the inclusion in the Housing Element of an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions to affirmatively further fair housing. The bill states that if the public agency completes or revises an assessment of fair housing or analysis of impediments to fair housing choice, the public agency may incorporate relevant portions of that assessment of fair housing into the Housing Element.

ASSESSMENT OF FAIR HOUSING ISSUES

ENFORCEMENT AND OUTREACH

The County also has a contract with Legal Aid Society of San Diego (LASSD) for fair housing services. In terms of enforcement, LASSD conducts fair housing testing on a quarterly basis. Upon a finding of possible discrimination, LASSD conducts follow-up tests, reviews the site for prior complaints, issues a warning, and presents findings. Additionally, LASSD assists with fair housing outreach in a number of ways including:

- Developing and conducting public seminars on fair housing laws and issues.

- Developing, disseminating, and submitting verification of publication or broadcast regarding fair housing issues, laws, and resources.

- Producing and distributing high-quality and, as appropriate, bilingual brochures and/or pamphlets to the public regarding fair housing law and regulatory issues.

- Operating a website that contains fair housing information and email capability, and providing the text of fair housing laws to the public, upon request.

- Annually conducting and/or participating in a regional San Diego Fair Housing Fair intended to educate the public on fair housing issues, laws, and resources.

- Consulting and participating with nonprofit, governmental, and private sector housing, and fair housing agencies active within the San Diego region, including membership and participation in the San Diego Regional Alliance for Fair Housing.

LASSD provided data for its activities in San Diego County during the 2020 to 2021 fiscal year. Data exclusive to the unincorporated areas was not available; *Table 6-I-1* also includes data from the cities of Del Mar, Coronado, Imperial Beach, Lemon Grove, Poway, and Solana Beach. Overall, LASSD assisted with 68 fair housing cases during the 2020 to 2021 fiscal year.

Table 6-I-1: LASSD FY 2020-2021 Actions

| No. of Cases	Service Provided
43	Education and Advice
6	Assisted with Reasonable Accommodation
4	Private Conciliation
2	Administrative Complaint
13	Withdrew from Services
Total cases: 68	

The HCD AFFH Data and Resources Mapping Tool only includes fair housing enforcement data at the County level, including the incorporated cities. The 2010 and 2020 maps for total Fair Housing Equal Opportunity (FHEO) cases, and cases of racial bias and disability, show that there are more cases for disability (60%-85% of total cases) than racial bias (5%-20% of total cases); that the total number of cases and racial bias cases as a percent of the population did not change significantly between 2010 and 2020 (0.01 and 0.025 per 1,000 population); and that the number of cases for disability bias decreased between 2010 and 2020.

The Housing Choice Voucher Program is a federal program operated by HUD that provides assistance to low-income families, the elderly, and the disabled so that they can access safe and sanitary housing. *Figure 6-I-1* shows the dispersion of Housing Choice Vouchers by census tract in the County and the vouchers as a percentage of renter-occupied housing units. There is relatively little use of vouchers in the unincorporated County areas. Many of the census tracts in the unincorporated County have no vouchers used, primarily due to the housing types available. Areas in the unincorporated County with voucher use correspond with the Village areas of Fallbrook, central Ramona, Spring Valley, Valle De Oro, and Lakeside. There are affordable and subsidized units that are maintained by private owners throughout the unincorporated areas, but there are no public housing buildings (i.e., owned by a local housing authority) in the unincorporated County.

Figure 6-I-1: Housing Choice Vouchers by Census Tract – San Diego County
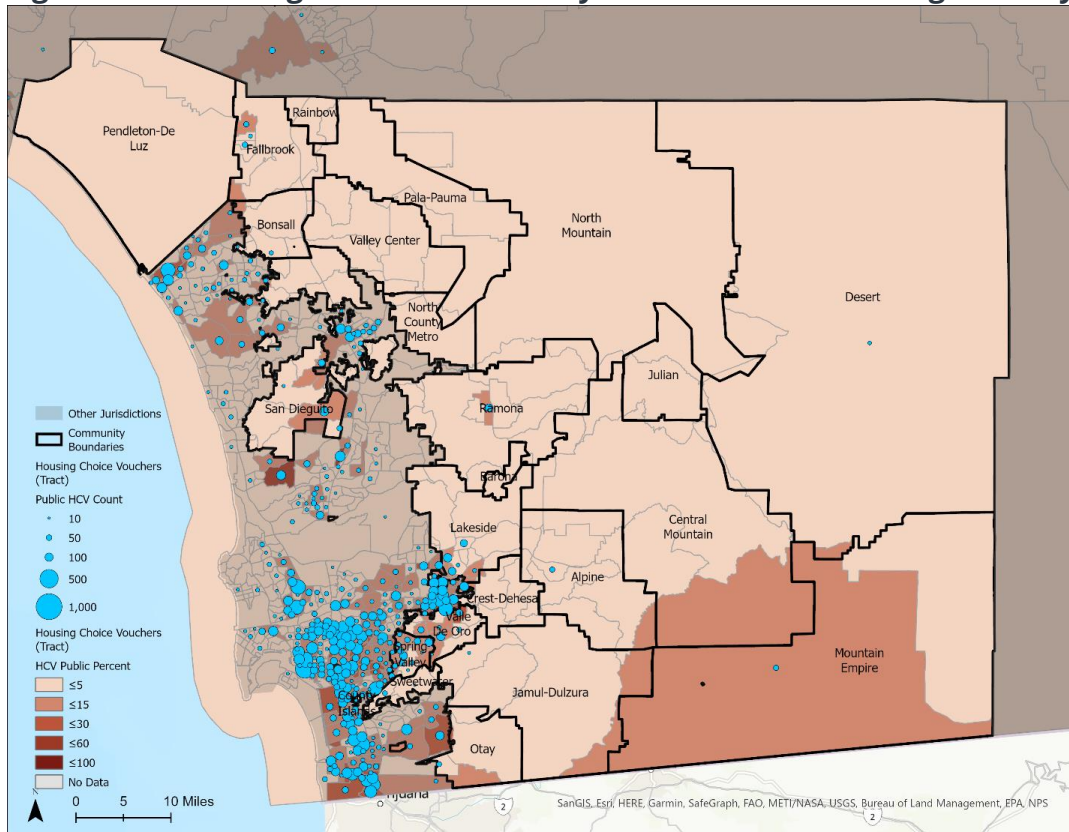
SOURCE: AFFH Data and Resources Mapping Tool.

Compliance with State and Federal Fair Housing Law

The County has taken the following actions to ensure compliance with state and federal fair housing laws.

- In 2019 the County adopted ordinances to ensure compliance with state laws regarding ADUs, JADUs, and density bonuses.

- The adopted Density Bonus Ordinance provides more incentives than what is mandated under state law. For example, state density bonus law provides 4 incentives for projects that provide 100% affordable housing. The County's zoning ordinance allows 4 incentives if the project provide 15% very-low, 30% low, or 30% moderate units.

- The County has updated all forms and handouts to comply with recent housing laws. This includes AB 2162 (Supportive Housing Ministerial Approval), AB 587, AB 671, AB 68, and SB 13, (ADU/JADU), and AB 1763 (Density Bonus).

- As a response to the Covid-19 pandemic, the Board of Supervisors adopted a local ordinance placing a moratorium on residential rent increase and prohibiting evictions on May 19, 2021.The ordinance goes beyond the state requirements.

- The County has a Mobile Home Park Conversion Board Policy (I-105) to support and protect mobile homes as a source of affordable housing. The policy establishes criteria permitting the waiver of improvement requirements for resident-initiated subdivisions of existing mobile home parks. The intent is to enable residents to compete in the marketplace more effectively for the purchase of their park by reducing cost and time in receiving subdivision approval.

- The County maintains a Comprehensive Homeless Policy (A-128) that embraces the State's housing first approach. The policy includes developing a Coordinated Assessment and Housing Placement The policy works to increase leadership, collaboration, and civic engagement, promote collaborative leadership, increase access to affordable housing and economic security, and improve the health and stability of those experiencing homelessness.

- In delivering housing services and programs, HCDS adheres to state and federal fair housing requirements to affirmatively further fair housing, including in its outreach, program delivery, program management and monitoring activities.

- The County maintained compliance with no-net-loss of units during the fifth Housing Element Cycle (Gov. Code, § 65863). The County developed a Housing Dashboard to track its progress of housing development on RHNA sites during the fifth Housing Element Cycle. For the 6th planning cycle, the County will continue to track housing production on RHNA sites to ensure to ensure compliance with RHNA during the entire housing element cycle. The Housing Dashboard will be expanded to track development more effectively on the identified RHNA sites. In addition, the County will require minimum density of 70% to avoid General Plan loss of units. Also, the County's Site Inventory provides over 30% buffer to ensure compliance with no-net loss. Finally, the County's housing portal shows that the County's General Plan has an overall capacity of 58,113 units. These units can provide buffer to ensure that the County continues to maintain capacity for the construction of above-moderate income housing.

- As a recipient of federal funds and part of the HUD-mandated Consolidated Plan and Annual Plan processes, HCDS certifies annually it will affirmatively further fair housing.

- As required by HUD for CDBG entitlement jurisdictions, to affirmatively further fair housing, HCDS allocates CDBG funds towards a Regional Fair Housing Program that provides fair housing outreach, education, testing, and referrals.

- To increase the stock of affordable housing, in 2017 the County Board of Supervisors created the Innovative Housing Trust Fund (San Diego County Code of Administrative Regulations, Section 232.5) with an initial amount of $50 million dollars. HCDS administers these funds to help facilitate affordable housing development across the region.

Summary of Enforcement and Outreach

- The County contracts with LASSD, which assists the County in conducting quarterly fair housing testing and numerous public outreach efforts.

- The use of Housing Choice Vouchers is primarily in the incorporated cities. The few uses in the unincorporated County appear to be in the more urbanized villages where apartments are located. These patterns make sense since the vast majority of rental housing exists in the cities and areas with the infrastructure and services capable of supporting higher-density housing.

- Disaggregated fair housing enforcement data is only available for incorporated cities and the County as a whole. No data is available for individual unincorporated communities, which are diverse and may face different fair housing issues.

INTEGRATION AND SEGREGATION

Race and Ethnicity

To measure segregation in a given jurisdiction, the US Department of Housing and Urban Development (HUD) provides racial or ethnic dissimilarity trends. Dissimilarity indices are used to measure how evenly two groups are distributed throughout a jurisdiction. Racial and ethnic dissimilarity trends for San Diego County CDBG jurisdictions, which includes the unincorporated areas and small cities that are participating in the CDBG program, and the San Diego County region are presented in *Table 6-I-2: Racial or Ethnic Dissimilarity Trends*. The following scale shows how HUD views various levels of the index:

- <40: Low Segregation

- 40-54: Moderate Segregation

- ≥55: High Segregation

Dissimilarity between racial or ethnic minorities and White communities has worsened in San Diego County CDBG jurisdictions since 1990. However, segregation between non-White and White communities in CDBG jurisdictions is considered low, while non-White and White communities regionally are considered moderately segregated. The CDBG jurisdictions showed less segregation between both Hispanic and White communities and Asian/Pacific Islander and White communities than the region, but higher segregation between Black and White communities. The dissimilarity index for Black and White communities in CDBG jurisdictions indicates that the two groups are highly segregated.

Table 6-I-2: Racial or Ethnic Dissimilarity Trends

| Racial/Ethnic Groups	1990 Trend	2000 Trend	2010 Trend	2020 Trend
San Diego County CDBG Jurisdictions				
Non-White/White	30.28	33.43	31.87	35.66
Black/White	54.49	53.01	48.66	55.96
Hispanic/White	29.50	35.08	35.4	37.03
Asian or Pacific Islander/White	36.64	34.53	37.11	43.58
San Diego County Region				
Non-White/White	43.4	45.18	42.85	46.42
Black/White	58.00	53.8	48.37	54.08
Hispanic/White	45.22	50.59	49.61	51.74
Asian or Pacific Islander/White	48.06	46.83	44.38	49.75

SOURCE: HUD AFFH data, 2020.

While the ethnic dissimilarity trend for White/Hispanic populations is lower compared to other racial or ethnic dissimilarity trends, it is geographically concentrated in certain communities. Ethnic dissimilarity trends between non-Hispanic and Hispanic populations by block group are shown in *Figure 6-I-2*. Census block groups mapped with more intense colors have a higher level of individual segregation than less intensively colored census block groups. Generally, the western and more populated areas of the County have higher indices of dissimilarity between non-Hispanic and Hispanic populations than the rural areas of the County. The highest level of dissimilarity is in south San Dieguito. This area is where the relatively new communities of Black Mountain Ranch (City of San Diego) and 4S Ranch (unincorporated) are located. The communities of Fallbrook, Valley Center, Ramona, Alpine, Lakeside, and Spring Valley also show higher indices of dissimilarity. Spatial analyses of White and Asian and White and Black populations showed higher dissimilarity indices throughout block groups but with little

geographic variation between block groups. The exception to this is high indices of dissimilarity of both White/Asian and White/Black in Sweetwater and San Dieguito.

Figure 6-I-2: Non-Hispanic/Hispanic Dissimilarity Index by Block Group
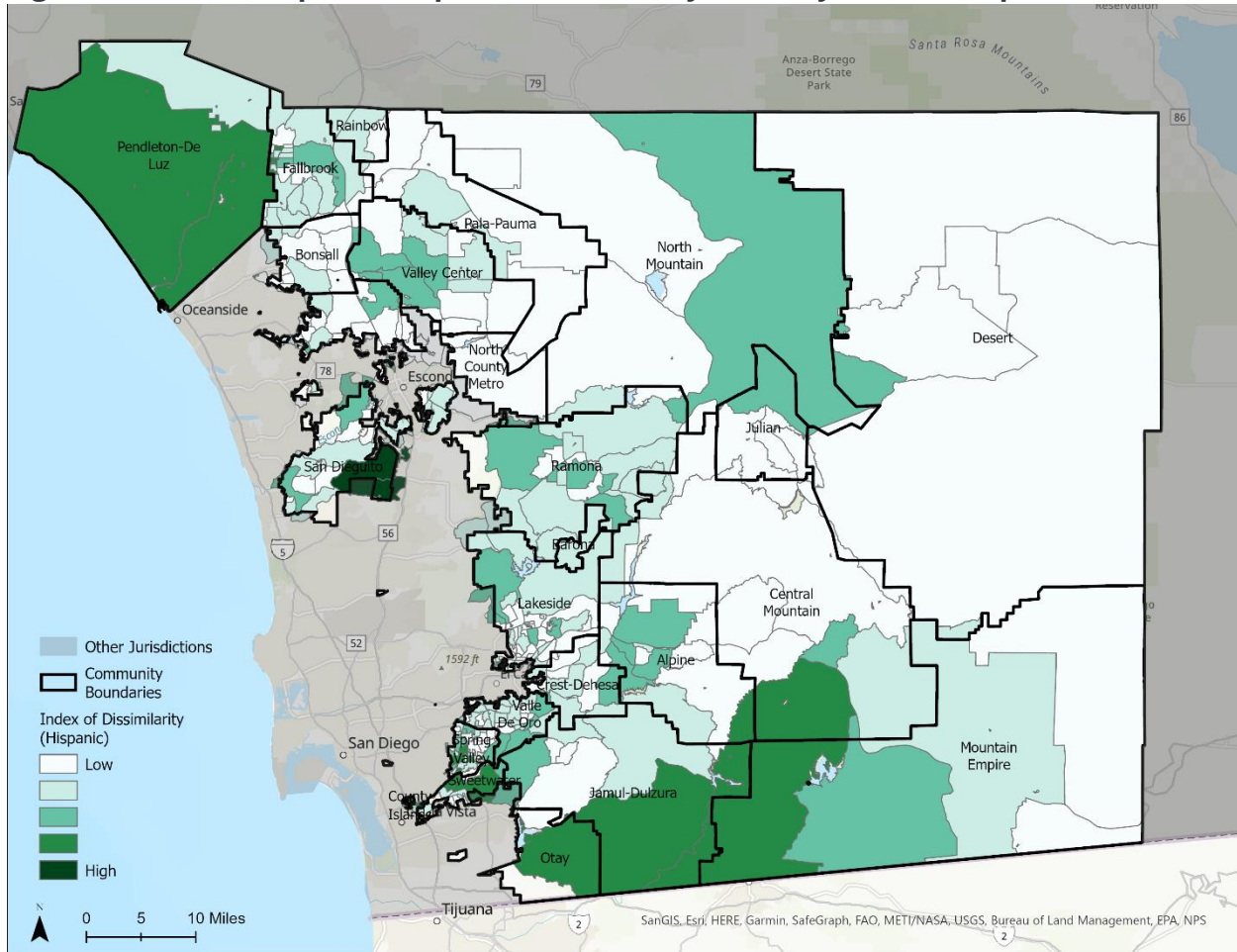
SOURCE: US Census, ACS 2017.

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. According to 2020 San Diego Association of Governments (SANDAG) estimates, approximately 44.9 percent of unincorporated San Diego County residents belong to a racial or ethnic minority group.

Figure 6-I-3 shows census tracts in San Diego County by the racial or ethnic groups that make up the majority of the population. The categories show the percentage population gap between the majority racial/ethnic group and the next largest racial/ethnic group. The more intense the color, the higher the percentage gap between the predominant racial/ethnic group and the next largest racial/ethnic group. Most of the population in the eastern and northern unincorporated County areas are majority White by a sizable or predominant gap. There are a few census tracts in Fallbrook, Sweetwater, Spring Valley, and the County Islands that have a Hispanic majority. Countywide, White residents make up 55.5 percent of the population and Hispanic residents make up 29.6 percent of the population.

Figure 6-I-3: Racial and Ethnic Majority by Census Tract – San Diego County
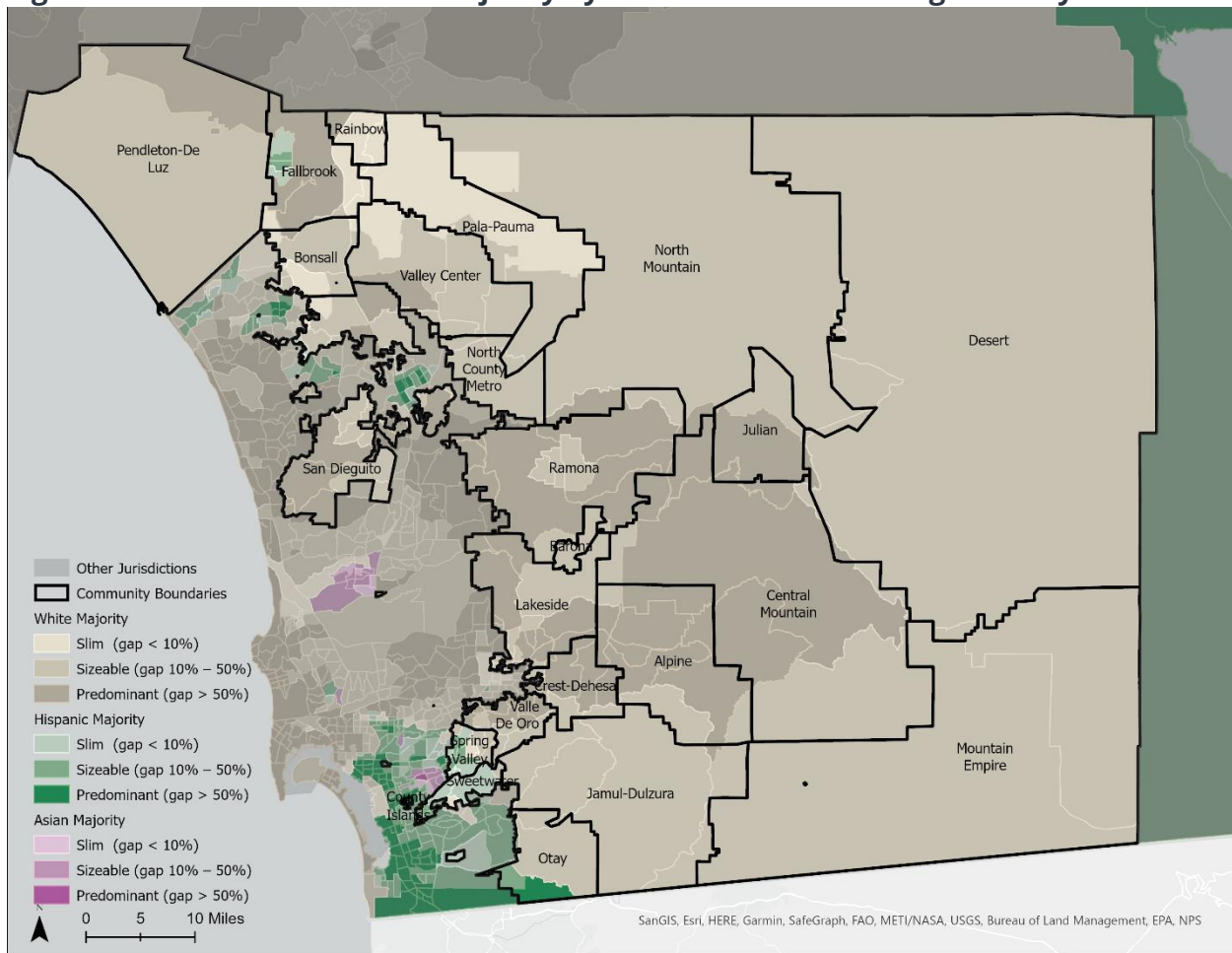
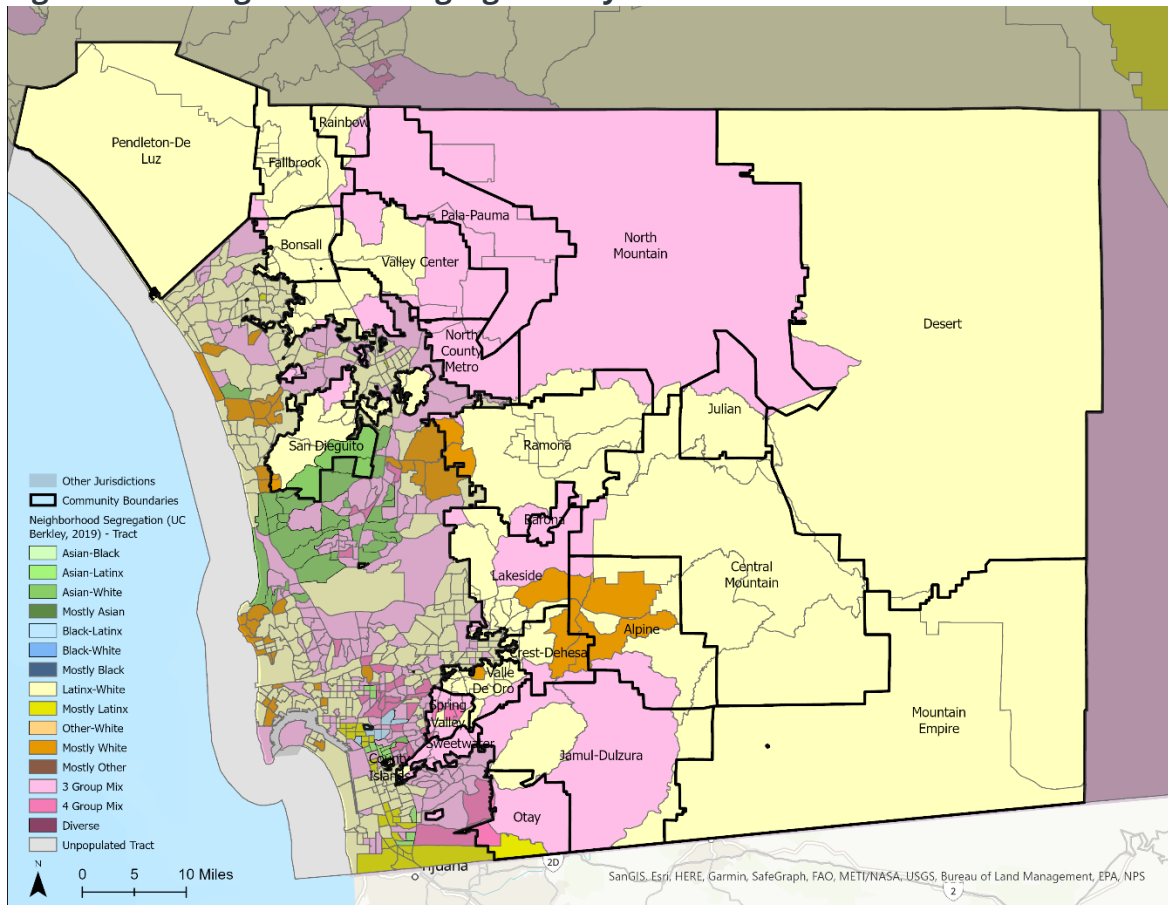SOURCE: AFFH Data and Resources Mapping Tool, May 2021.

Figure 6-I-4 shows what racial/ethnic groups represent more than 10 percent of each census tract. Unincorporated areas in the northeastern section of the County, such as the Palomar and North Mountain communities, have three ethnic groups that each make up over 10 percent of the population. All other racial/ethnic groups represent less than 10 percent of the population in these census tracts. *Figure 6-I-5* shows areas in San Diego County that have minority populations above the County average of 50.8 percent.

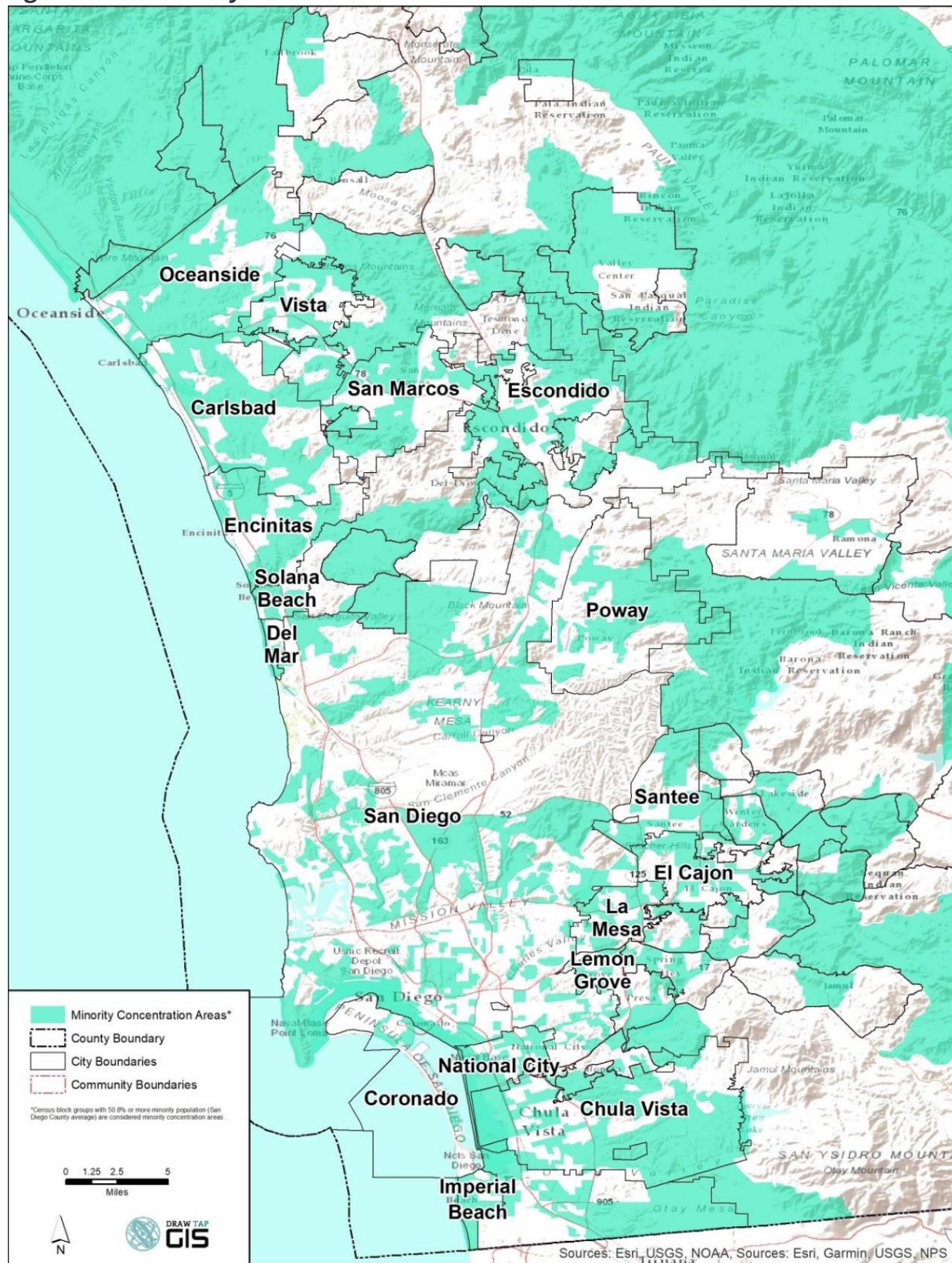**Figure 6-I-4: Neighborhood Segregation by Census Tract**

SOURCE: AFFH Data and Resources Mapping Tool; University of California, Berkeley, Gentrification and Displacement Map: Neighborhood Segregation (based on 2011-2015 ACS), July 2018.

Figure 6-I-5: Minority Concentration Areas

SOURCE: San Diego Regional Analysis of Impediments to Fair Housing Choice (based on 2013-2017 ACS), August 2020.

Disability

According to the 2014-2018 ACS, 11 percent of unincorporated San Diego County residents have a disability, compared to 9.8 percent Countywide. *Figure 6-I-6* shows the percentage of the population with a disability per census tract. No census tract has greater than 20 percent of the population with a disability. Populations with a disability are not concentrated in any particular area of the County. A comparison of the 2010-2014 and 2015-2019 maps shows a general increase in the percentage of the population with disabilities in the western unincorporated County, and a decrease in the Mountain Empire and eastern Alpine areas. Regional patterns indicate that concentrations of populations with a disability generally mirror larger population trends; there is no area in the region that has a disproportionate concentration of persons with a disability.

Many people with disabilities are also cost burdened due to their relatively fixed incomes.

Figure 6-I-7 shows concentrations of persons with disabilities compared to racially or ethnically concentrated areas of poverty (R/ECAPs) and minority concentrations Several unincorporated communities, such as San Dieguito (south of San Marcos), Spring Valley (south of Lemon Grove) and the surrounding areas, have higher concentrations of both disabled and minority populations.

Figure 6-I-6: Percent of Population with a Disability, 2010-2014 and 2015-2019, by Census Tract
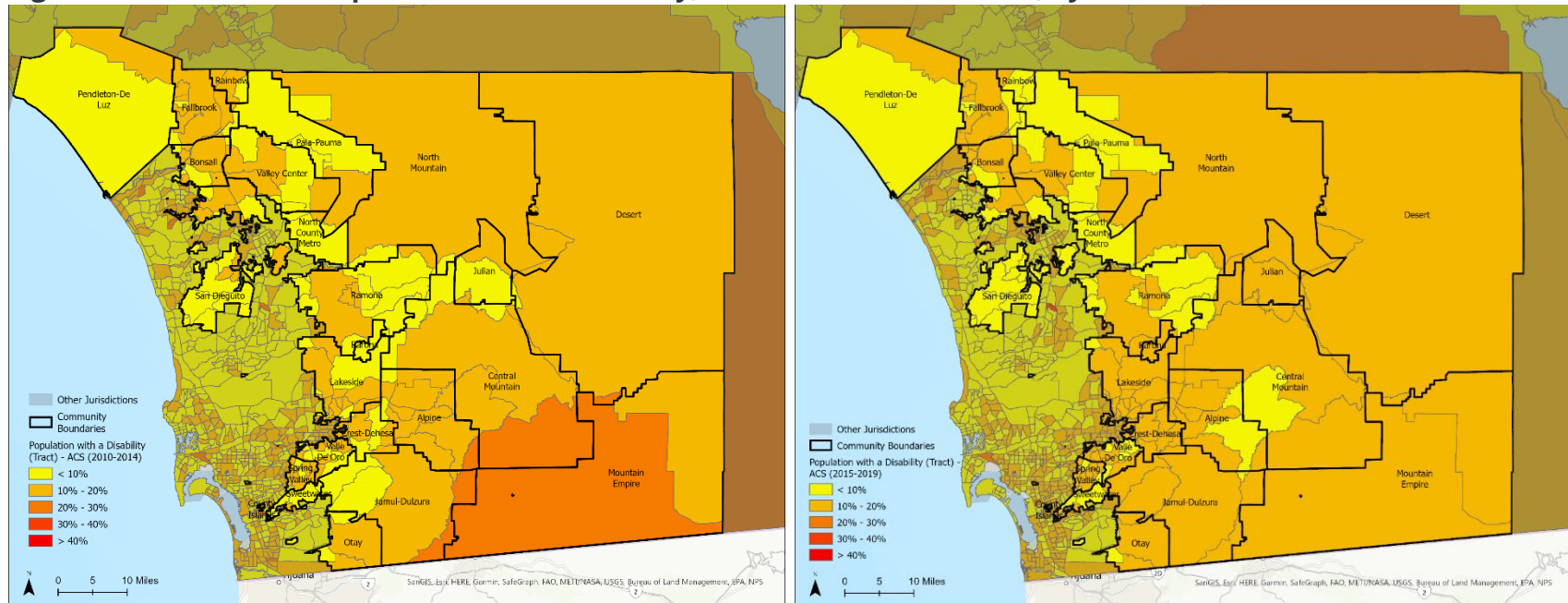
SOURCE: AFFH Data and Resources Mapping Tool.

Figure 6-I-7: Persons with Disabilities, Minority Concentration Areas and San Diego County R/ECAPs
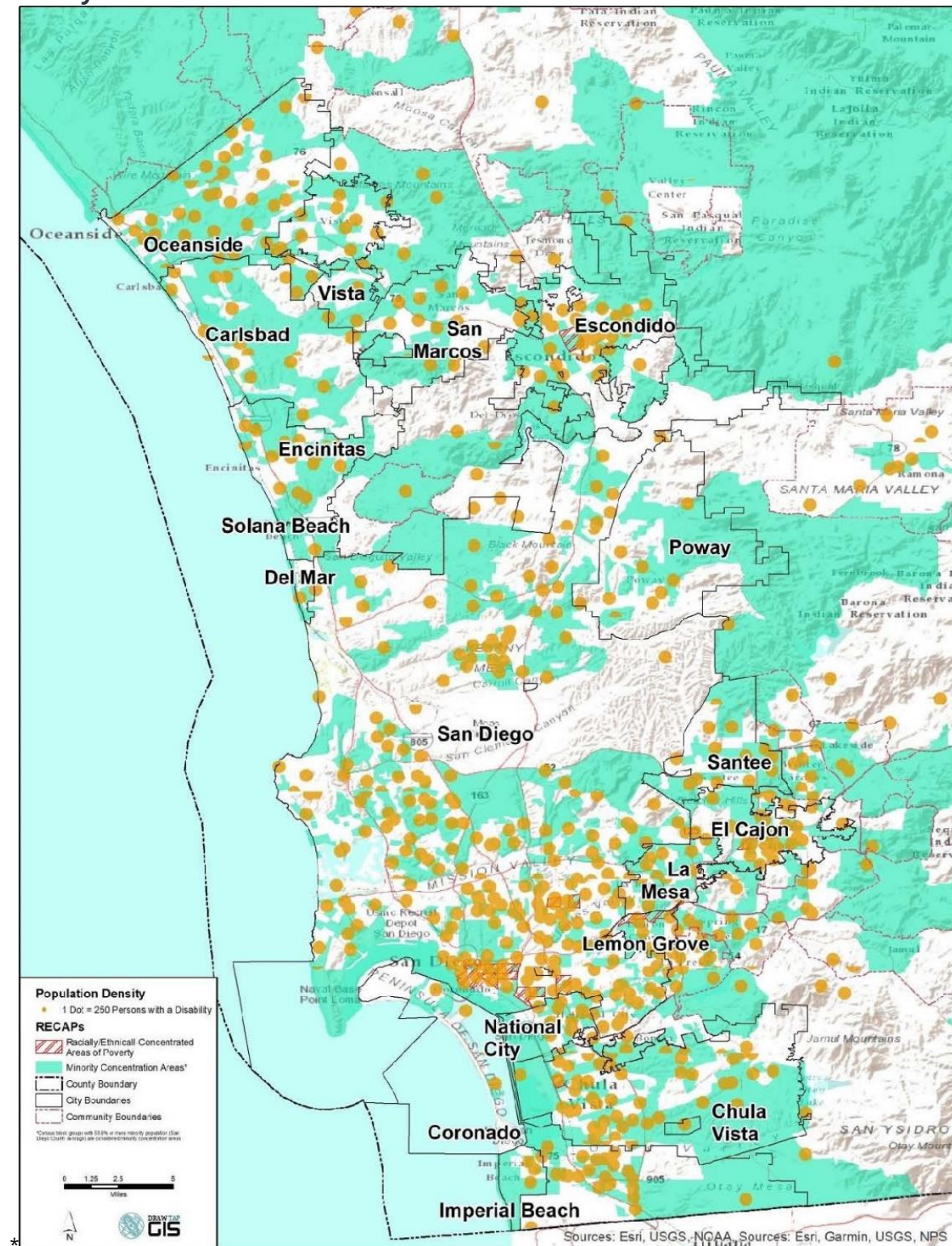
SOURCE: San Diego Regional Analysis of Impediments to Fair Housing Choice (based on 2013-2017 ACS), August 2020.

Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of household. 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. The 2014-2018 ACS estimates that 31.3 percent of unincorporated County households are families with children. The unincorporated County has a slightly higher share of families with children than the County as a whole (30 percent).

Single-parent households are also protected by fair housing law. Approximately 24 percent of households with children in the unincorporated County are single-parent households. *Figure 6-I-8* shows the percentage of children in married-couple households by census tract. Tracts in central Ramona, Spring Valley, and Valle De Oro have fewer children in married-couple households.

Figure 6-I-8:Percent of Children in Married-Couple Households
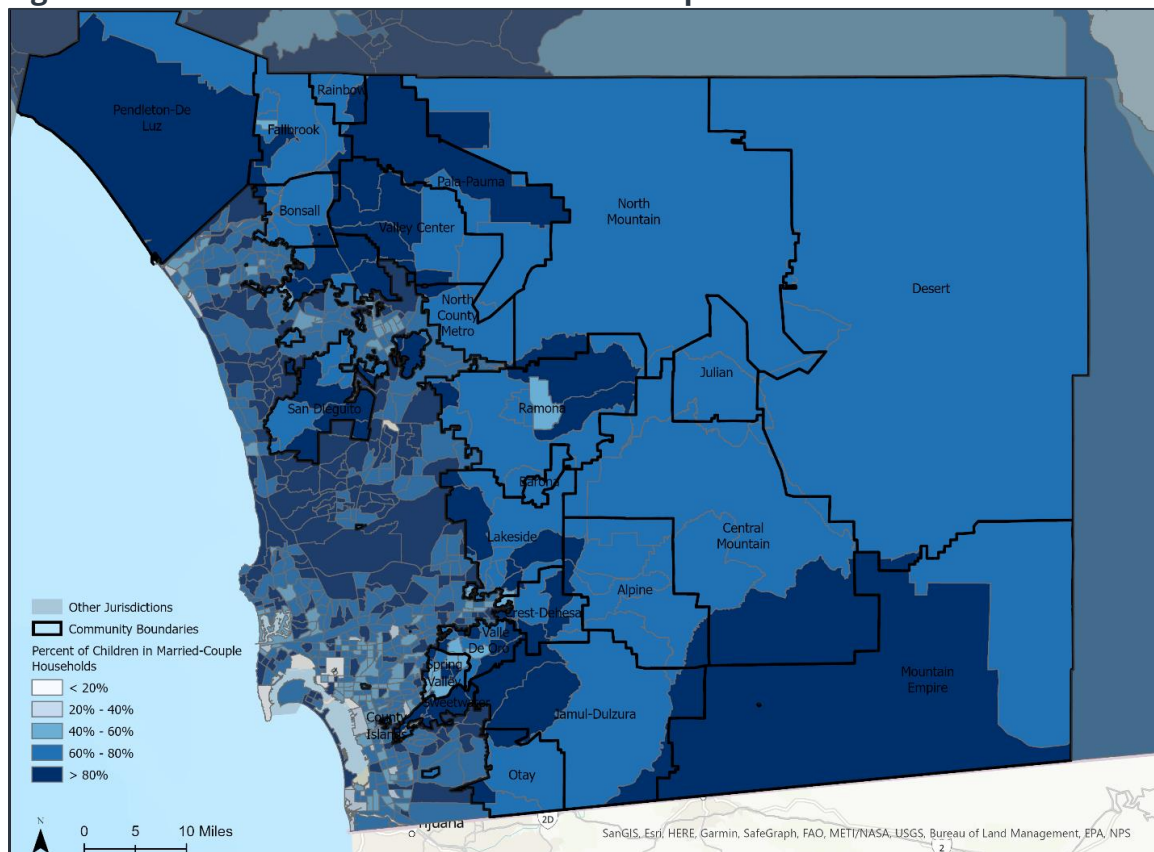
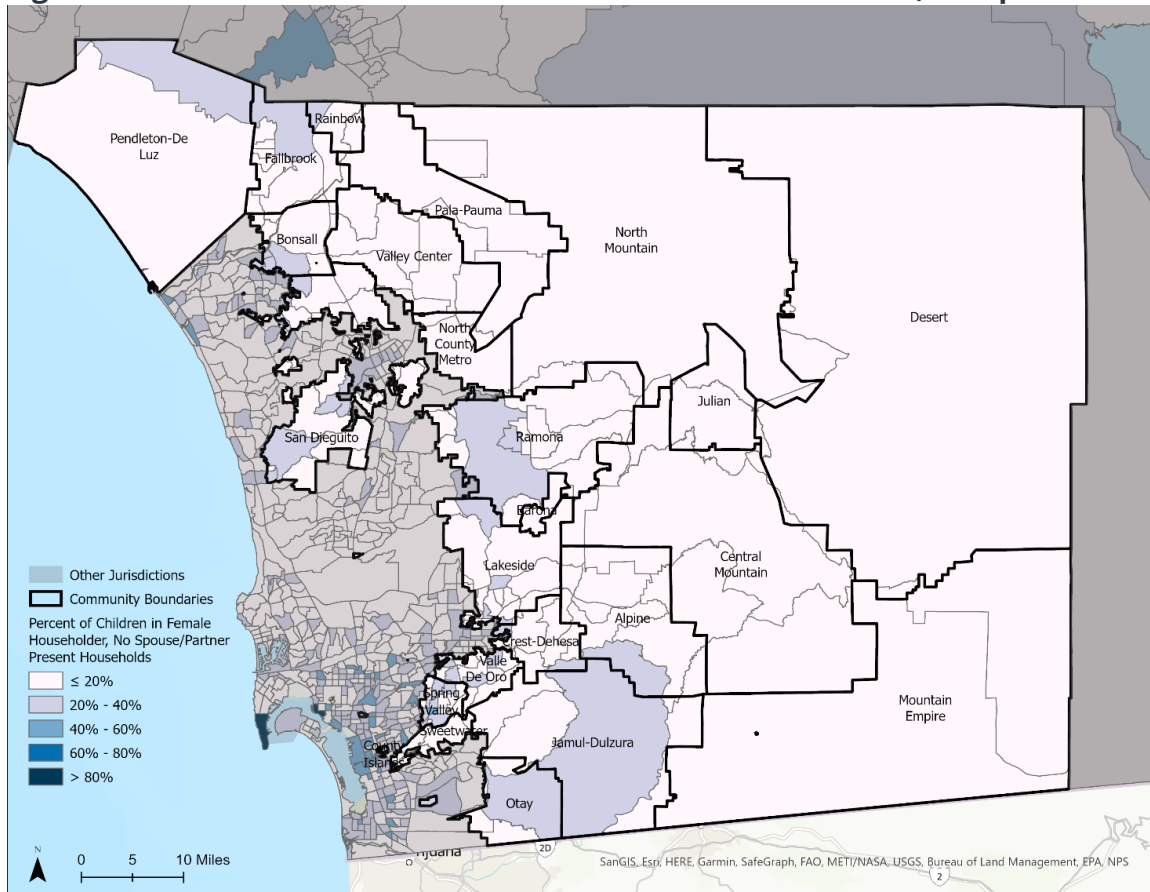SOURCE: HCD AFFH Data and Resources Mapping Tool, US Census ACS 2015-2019.

Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Approximately 16 percent of households with children in the unincorporated County are single female-headed households. The percentage of children in female-headed, single-parent households is shown by census tract in *Figure 6-I-9.* Most census tracts have less than 20 percent of children in female-headed single-parent households; however, there is one census tract with 40-60 percent of children in a single female-headed household, located in Spring Valley. Census tracts in the areas of Fallbrook, Bonsall, San Dieguito, Ramona, Valle De Oro, and Spring Valley register 20-40 percent of children in female-headed, single-parent households. One large census tract spanning Jamul-Dulzura, Otay, and Alpine also shows 20-40 percent of children in a female-headed, single-parent household.

Regional patterns among familial status show that in more populated areas of the region there tend to be a slightly higher percentage of children in female-headed households and a lower percentage of children in married couple households. Typically, high density development represents generally smaller unit sizes and are therefore, more attractive and affordable to young families without children. The Downtown San Diego area shows the highest concentration of children in female-headed households. These patterns mirror population trends; there are no other clear regional trends.

Figure 6-I-9: Percent of Children in Female-Headed Households, No Spouse Present

SOURCE: HCD AFFH Data and Resources Mapping Tool, US Census ACS 2015-2019.

Income

Identifying low-income geographies and individuals is important to overcome patterns of segregation. According to the 2014-2018 ACS, 30.8 percent of unincorporated County households earn 80 percent or less than the area median income and are considered lower income. In comparison, 43 percent of households in the region are considered lower income (2020 HUD CHAS data). Thus, the unincorporated County has a lower percentage of low income households than the region as a whole.

Figure 6-I-10 displays the percentage of each census block group in the low- or moderate-income category. This includes a majority of the population in the northwestern section (unincorporated Pendleton-DeLuz community), southern Lakeside/Bostonia, central Ramona, portions of Spring Valley and Valle de Oro, and unincorporated eastern section of the County the sparsely populated North Mountain, Desert and most of the Mountain Empire communities that are considered lower income. The remaining unincorporated areas (Fallbrook, Rainbow, Valley Center, Bonsall, North County Metro, Central Mountain, Otay, Alpine, Crest-Dehesa, Jamul-

Dulzura, Lakeside) have higher populations of moderate- and above moderate-income households.

Figure 6-I-10: Percent of Low- to Moderate-Income Households by Census Block Group
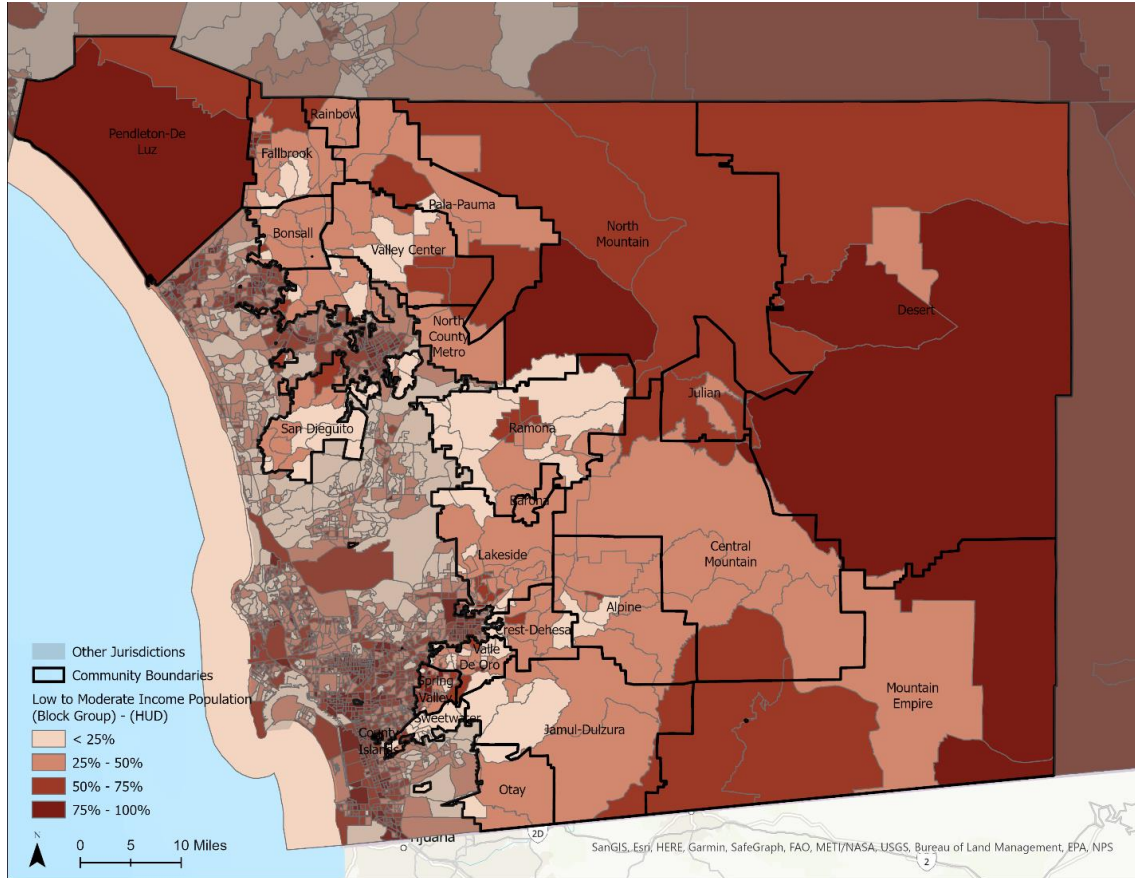
SOURCE: HCD AFFH Data and Resources Mapping Tool. May 2021.

A comparison of median household income from 2010-2014 and 2015-2019 is shown in *Figure 6-I-11* below. The maps show an increase in median household incomes in the North County/I-15 corridor and decreases in the Pala Pauma area. Apparent changes in other areas reflect the increased precision of data mapping between the census tract data (2010-2014) and census block group data (2015-2019). Changes in the unincorporated County tend to align with regional income patterns. Incomes in suburban areas of the region are higher than those in concentrated urban centers and rural areas.

Figure 6-I-12 shows the percentage of population under the federal poverty line from both 2010-2014 and 2015-2019. Only two tracts in the County fall into the 20-30 percentage group, one in the Mountain Empire and one spanning the south end of Lakeside and northwest portion of Crest-Dehesa. There are no community plan areas experiencing high concentrations of poverty.

A comparison of the 2010-2014 and 2015-2019 Poverty Status maps shows that most areas in the unincorporated County improved (decreased) the percentage of households below the poverty level. Two census tracts west and northeast of Ramona and the western Mountain Empire tract increased the percentage of population below the poverty level. The Mountain Empire area is sparsely populated and the changes in the map categories may be attributed to small changes in a very small data set. It appears that lower-income households in this area may be on limited incomes or otherwise have not had access to employment opportunities that kept pace with housing and other costs of living increases. Again, regional patterns show higher rates of households below the poverty line in concentrated urban centers than in less dense areas. Urban centers typically have higher concentration of rental housing, more affordable to lower income households, whereas homeownership is often beyond the reach of poverty level households.

Figure 6-I-11: Median Household Income 2010-2014 (Tract) and 2015-2019 (Block Group)
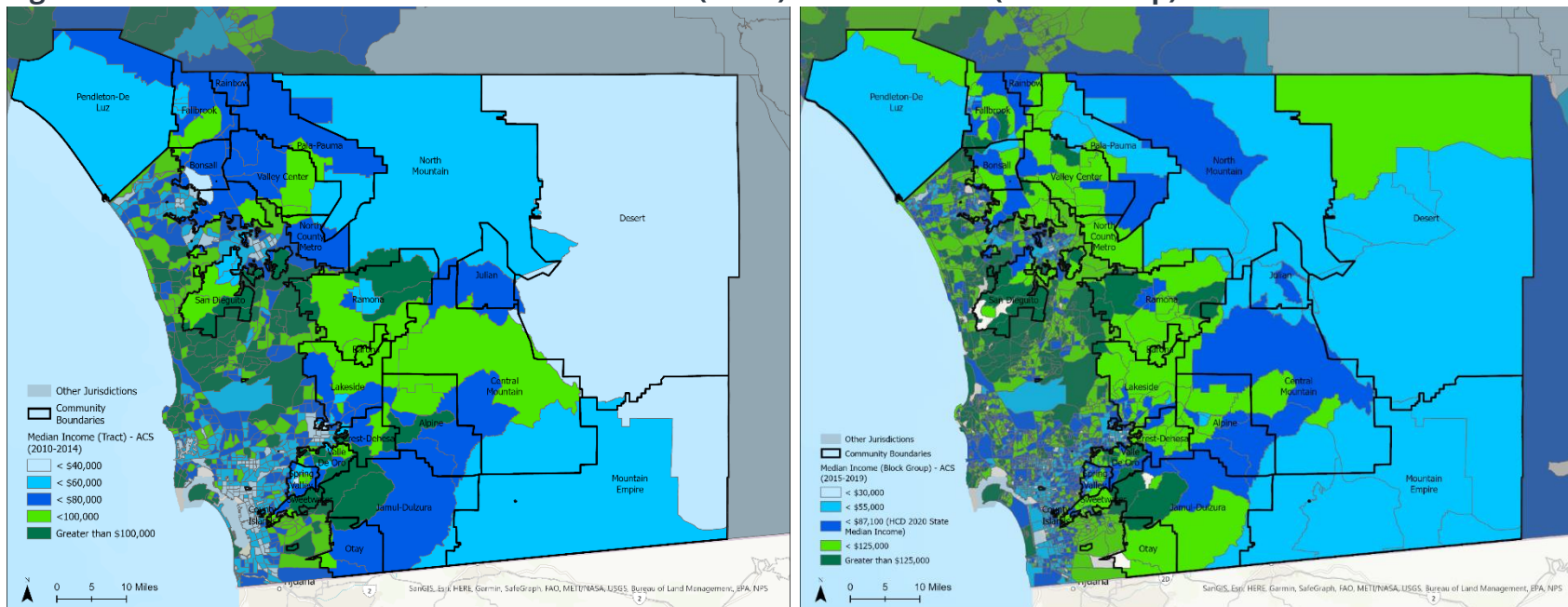
SOURCE: HCD AFFH Data and Resources Mapping Tool, US Census ACS 2010-14 and 2015-2019.

Figure 6-I-12: Percent of Population in Poverty, 2010-2014 and 2015-2019, by Census Tract
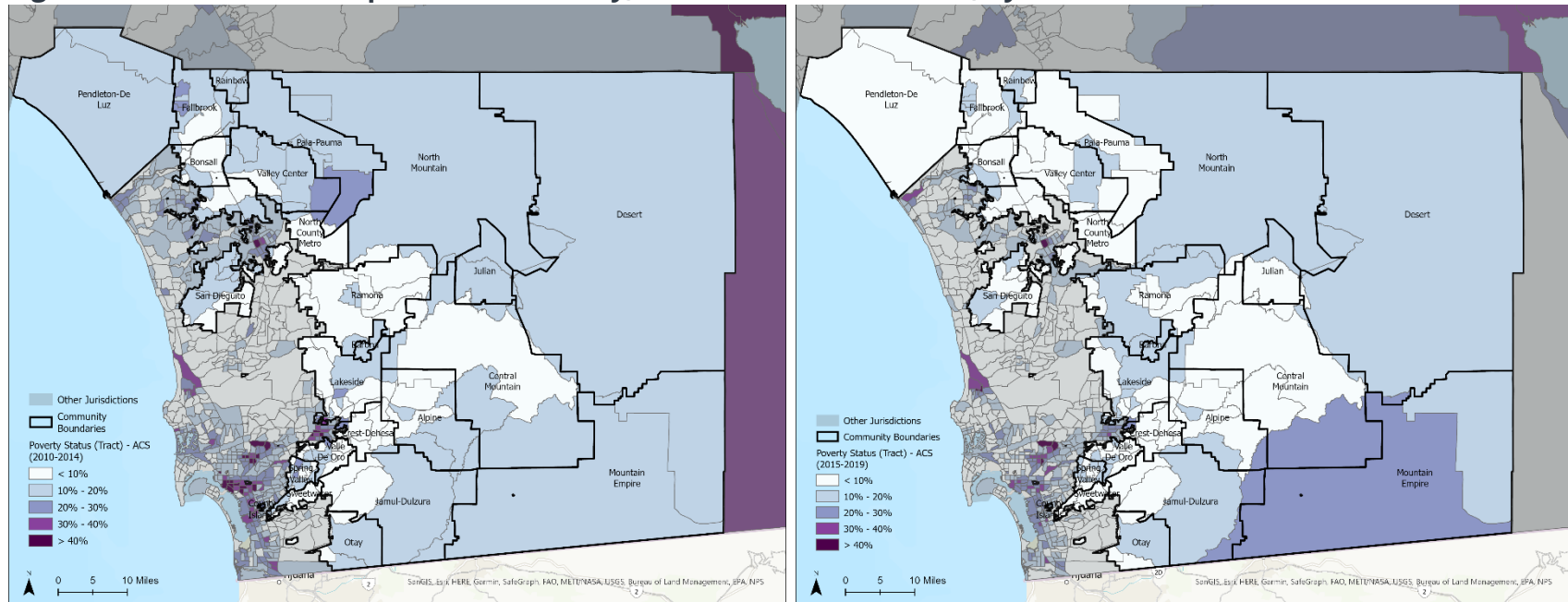
SOURCE: AFFH Data and Resources Mapping Tool US Census ACS 2010-14 and 2015-2019.

Racially/Ethnically Concentrated Areas of Poverty

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) with 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. According to HUD's 2020 R/ECAP database, there are 16 R/ECAPs in San Diego County, located in the Cities of San Diego, Escondido, El Cajon, La Mesa, Lemon Grove, National City, and Chula Vista. There are no R/ECAPs located in the unincorporated County areas. R/ECAPs in San Diego County are shown in *Figure 6-I-13*.

Figure 6-I-13: R/ECAPS in San Diego County
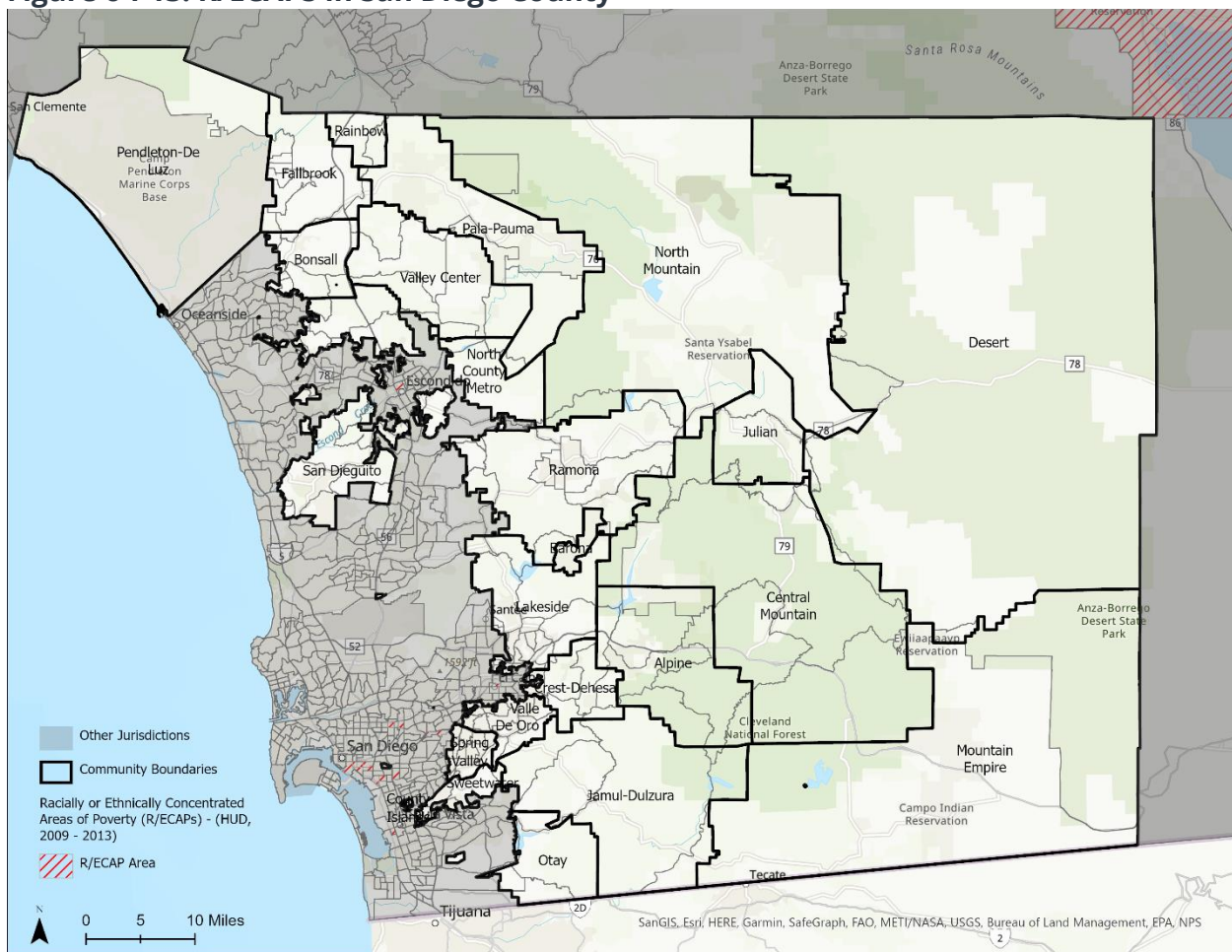
SOURCE: HUD AFFH Mapping Tool, July 2020.

Racially/Ethnically Concentrated Areas of Affluence

While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. A HUD policy paper defines RCAAs as affluent White communities. According to this report, Whites are the most racially segregated group in the United States and "in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities."[55]

Because RCAAs have not been studied extensively nor has a standard definition been published by HCD or HUD, this fair housing assessment uses the percentage of the non-Hispanic White population and median household income as proxies to identify potential areas of affluence. As shown in *Figure 6-I-3*, unincorporated areas east of El Cajon and north of Escondido have mostly White populations. However, White populations do not appear to be concentrated in a specific area anywhere in the unincorporated areas. The northwestern section (Pendleton-DeLuz community) and less populated eastern County have a higher percentage of lower-income households. A comparison of 2010-2014 and 2015-2019 Median Household Income maps shows an increase in median household incomes in the North County/I-15 corridor and decreases in the Pala Pauma Valley block group areas.

Local knowledge and evaluation also indicate Rancho Santa Fe (part of the San Dieguito Community) as a RCAA. Rancho Santa Fe has some of the highest home costs in the region, and appears to be disproportionately white. When Rancho Santa Fe was originally developed, racial covenants prevented minorities from owning or occupying homes in the community. After racial covenants were made illegal, Rancho Santa Fe maintained race restrictions in 'The Covenant,' a homeowners agreement which governed development in the area. These restrictions were removed after the Fair Housing Act was passed in 1968. Rancho Santa Fe is a registered historic landmark, which likely contributes to its high home values and its status as an RCAA.

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[55] Goetz, Edward G., A. Damiano, and R. A. Williams. 2019. "Racially Concentrated Areas of Affluence: A Preliminary Investigation." Published by the Office of Policy Development and Research (PD&R) of the US Department of Housing and Urban Development in *Cityscape: A Journal of Policy Development and Research* (21,1, 99-123).

Summary of Integration and Segregation

- There are no R/ECAPs in the unincorporated County.

- Several areas are identified in the segregation evaluation maps with more than one concentration issue include:

  o Pala Pauma Valley – higher percentage of lower-moderate income households; decreased median household income trend; higher concentrations of minority populations

  o Western Fallbrook – four town center tracts show lower median incomes; higher percentages of lower-moderate income households; and racial and ethnic minority majorities (Hispanic, White)

  o Spring Valley – higher concentrations of minority populations; higher percentage of lower-moderate income households

  o Southern Lakeside/Bostonia – high concentrations of minority populations; high percentage of low-moderate income households

  o Mountain Empire – more than 75% of households are low to moderate income; the percentage of households below the poverty level increased to 20-30%

- Contributing factors for higher concentrations of lower income households and minority populations these areas include the presence of older higher-density housing that can no longer command higher rents, and therefore attract lower-income households to the relatively lower rents. Spring Valley is immediately west of former redlined areas in the City of San Diego and may have suffered from the same lingering effects of discriminatory lending and rental practices. The Pala Pauma Valley area is sparsely populated and is likely to have more households on limited fixed incomes that do not keep pace with the increasing costs of living.

- Several communities exhibited some racially concentrated areas of affluence (RCAAs) characteristics including both higher relative median household income and majority white populations. However, local knowledge does not support the conclusion that they are RCAAs as the areas are not concentrated or of particularly high incomes, and are relatively diverse racially and ethnically and economically overall.

- Rancho Santa Fe – The Rancho Santa Fe Homeowners Agreement ('The Covenant') prohibited most minority groups from living in the community until 1968. This is a

contributing factor to why this neighborhood is disproportionately White compared to the County as a whole.

ACCESS TO OPPORTUNITIES

HUD Index Scores

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. *Table 6-I-3: Opportunity Indicators by Race/Ethnicity—San Diego County* 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 fourth 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 percent 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. *Figure 6-I-15* displays a map of the jobs proximity index for the County.

- 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 6-I-3,* in San Diego County (including incorporated cities), 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, and lower labor participation rates. 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.

As expected, populations living below the poverty line of all ethnic/racial groups had lower indices for most opportunity indicators than the total population of that ethnic/racial group. Still, for populations living below the federal poverty levels, Native American, Black, and Hispanic residents were more likely to have limited access to opportunities like lower exposure to poverty, high quality schools, high labor force participation, and proximity to jobs.

Table 6-I-3: Opportunity Indicators by Race/Ethnicity—San Diego County

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
San Diego County (including cities)							
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

SOURCE: HUD AFFH Data Tool.

Access to Transportation

Access to adequate transportation and a variety of transit options can help illustrate disparities in access to opportunities. In the unincorporated County, access to transportation varies. Transportation infrastructure in the unincorporated County tends to be car-centric, especially in the low-density and rural areas of the County. There are two interstates within the unincorporated County, I-8 and I-15. This aligns with regional, auto-centric transportation patterns in San Diego County.

Two transit providers operate in the region. The areas in which each provider operates are shown in 6-I-14. The Metropolitan Transit System (MTS) provides light rail (trolley) and bus services to the central, southern, and eastern areas of San Diego County. The North County Transit District (NCTD) provides rail (Coaster and Sprinter) and bus services to North County San Diego, which includes the unincorporated communities of Ramona, San Dieguito, North County Metro, Valley Center, Pala-Pauma, Bonsall, Fallbrook, Rainbow and Pendleton-DeLuz.

6-I-14 also displays areas within a half-mile radius of a transit stop. Village centers have better access to transit than the rural East County areas. Bus access is provided to all the Village centers; however, the unincorporated areas of the county tend to have lower access to non-automobile transportation options. Village areas with high access to public transportation include Spring Valley and Lincoln Acres. The Buena Creek Sprinter site provides transit access to the communities of Fallbrook and North County Metro. Compared to the rest of San Diego County, the unincorporated area has less proximity to public transit. This is in part due to the rural nature and low density of much of the unincorporated County. Regional trends show access to public transit mirror population and density makeup of the area.

The County's *Active Transportation Plan* was approved by the County Board of Supervisors in October 2018. The purpose of the plan is to provide goals, policies, objectives, and actions related to safety for pedestrians and cyclists, increasing accessibility of active transportation, and encouraging modes of active travel.[56] The plan takes into consideration SANDAG's regional transportation planning efforts throughout the County.

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[56] San Diego County Active Transportation Plan. Accessed July 2021.
https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/activetransportationplan/FinalATPOctober2018.pdf

Figure 6-I-14: Areas within a Half-Mile of a Transit Stop and Transit Districts

Access to Employment Centers

Another aspect of equal access to opportunity is access to regional employment centers. *Figure 6-I-15* displays the job proximity index by census block group. It shows that the job centers are in the incorporated cities, with smaller employment centers and clusters in the more urbanized villages in the unincorporated County. It is noted that there appears to be a counterintuitive mapping result where the census tracts in the unincorporated County that are nearest the major and smaller employment centers are symbolized as being farthest away. These include the areas immediately east of downtown San Diego such as Sweetwater, Spring Valley, and Valle de Oro, as well as commercial and mixed-use village centers in Ramona, Lakeside, and Fallbrook. The mapping methodology appears to assign low values for these areas as within the influence and draw of, but relatively distant to, the major employment centers in the City of San Diego. Despite the HUD methodology indicating that these communities are farthest from employment, local knowledge and evaluation of these factors supports that these areas have more adequate access to major employment centers in Downtown San Diego, Sorrento Valley, and Kearny Mesa,

relative to other unincorporated areas. These unincorporated communities may have low numbers of employment within the community, but still have access to the region's job clusters. *Figure 6-I-16* illustrates regional employment centers identified by SANDAG. The SANDAG map supports the conclusion that the communities of Sweetwater, Spring Valley, Valle de Oro, and Lakeside should not be classified as "Furthest Proximity" based on their direct access to San Diego's major employment hubs. Ramona also has access to agricultural jobs and a regional employment center in Poway, which increases the amount of employment opportunities and transportation options for Ramona residents compared to other unincorporated communities.

Figure 6-I-15: Job Proximity Index by Census Block Group
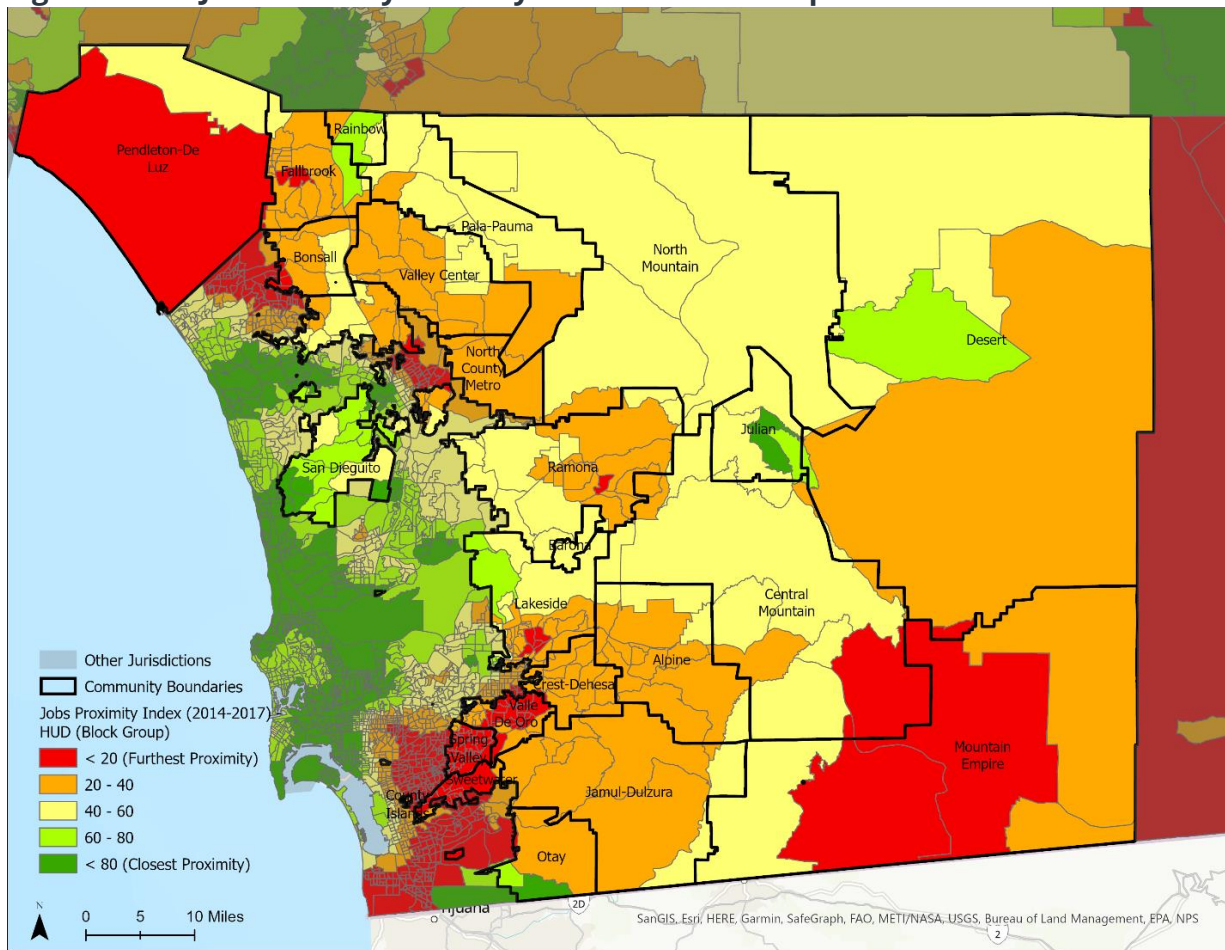
Source: HCD AFFH Data and Resources Mapping Tool. May 2021.

Figure 6-I-16: SANDAG Employment Centers Map
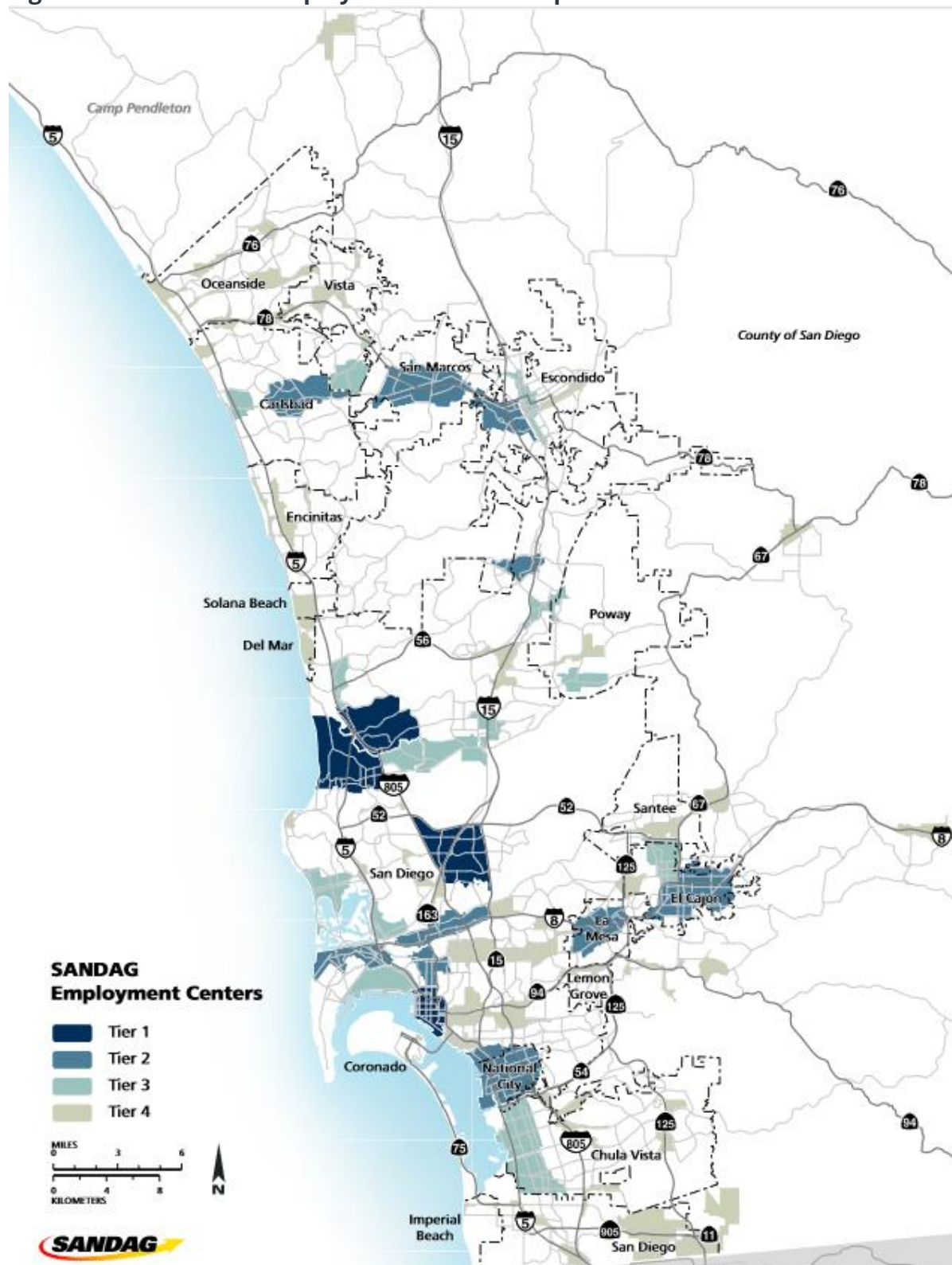
Source: SANDAG Employee Centers and Number of Employees, May 2019.

CalEnviroScreen 4.0

Figure 6-I-17 displays CalEnviroScreen 4.0 scores for the region. CalEnviroScreen is a statewide tool that helps identify which communities in the state are most affected by various pollutants. A higher score signifies a higher pollution burden. Areas in the County that experience the most burden from pollution are Spring Valley, the Mountain Empire, Pendleton-DeLuz and parts of Lakeside and Otay. No areas of the unincorporated County have a score above the 51-60% bracket. The Mountain Empire has a higher score due to its reliance on wells for drinking water. Local knowledge suggests higher scores in Spring Valley may be due to industrial uses in close proximity of commercial and residential uses.

Figure 6-I-17: CalEnviroScreen 4.0 Scores
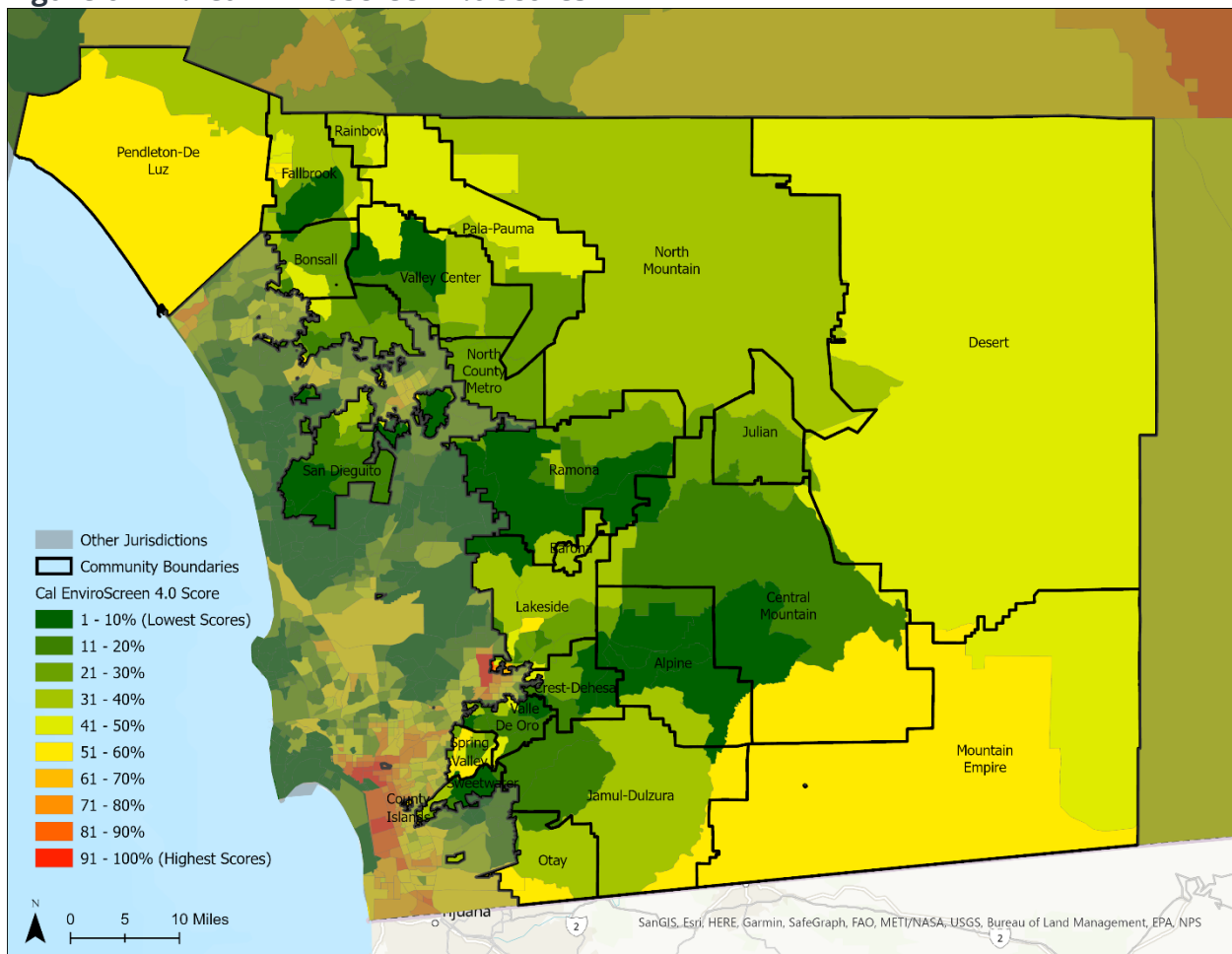
SOURCE: HCD AFFH Data and Resources Mapping Tool. May 2021.

California Tax Credit Allocation Committee (TCAC) Opportunity Areas

Another tool that can analyze disparities in access to opportunities are the California Tax Credit Allocation Committee's (TCAC) Opportunity Area scores. These were prepared by a taskforce commissioned by TCAC and HCD to identify areas statewide whose economic, educational and environmental characteristics support positive outcomes for low-incomes families. The tool is updated annually. Opportunity maps are made for three domains, economic, environmental, and education. Each of these three maps uses a number of indicators to determine their individual score. Economic indicators include poverty, adult education, employment, job proximity and median home value. The environmental domain utilizes CalEnviroScreen 3.0 indicators. Education indicators include math and reading proficiencies of fourth graders, high school graduation rates and the student poverty rate. A composite score and resource designation combining all three designations is then assigned to each block group.

Figure 6-I-18 shows the TCAC Composite score for San Diego County. Along with the composite score, opportunity areas are given an economic, education and environment score, shown in figures *Figure 6-I-19*, *Figure 6-I-20*, and *Figure 6-I-21,* respectively. The areas in the maps displayed as missing/insufficient data are considered rural areas and are excluded from the TCAC mapping application. This includes large portions of the North Mountain, Desert, Central Mountain and Mountain Empire areas. Pendleton-DeLuz is excluded from the TCAC since the majority of the area is comprised of the Marine Corps base Camp Pendleton.

In the unincorporated area, the communities with the highest resources are located in the western and central portions of the unincorporated County. The areas of Lakeside, parts of Fallbrook, North County Metro, and Pala-Pauma, and Spring Valley are low resource. Higher resource areas of the County include Ramona, Alpine, Julian, San Dieguito and parts of Fallbrook, Bonsall, and Valley Center.

Economic scores are highest in Fallbrook, Bonsall Ramona, San Dieguito and areas of Alpine Sweetwater in Valle De Oro. They tend to reflect the pattern of median household income. Economic scores are lower for eastern census tracts that tend to have lower home values and are further away from job centers. Education scores have a very similar pattern to economic outcomes. They are higher in San Dieguito, Bonsall, areas of Ramona, Alpine, Sweetwater and Julian. They are lowest in Spring Valley, North County Metro and Pala-Pauma.

Environmental scores tend to have a slightly differing trends when compared to economic and education scores. They are higher in Valley Center, Pala-Pauma, Ramona and some tracts of Fallbrook, Spring Valley and Valle De Oro. Areas with less positive environmental outcomes

include Rainbow, North County Metro, San Dieguito, Lakeside, Crest-Dehesa, Jamul-Dulzura and Otay.

Generally, the same patterns are expressed in the component TCAC maps for economic, education and environment, though this is not always the case. For example, the areas of Valley Center, Spring Valle and Pala-Pauma have positive environmental outcomes with a lower education score. Conversely, the areas of Bonsall, San Dieguito and central Alpine have lower environmental outcomes with higher educational outcomes. It is noted that the large area in Otay and Jamul-Dulzura communities identified as having the highest resources in the composite score map appears to be inconsistent with the relatively low scores (less positive outcomes) in two of the three component data sets and maps. It is possible that lack of data for education may have skewed the results.

Figure 6-I-18: TCAC Composite Score
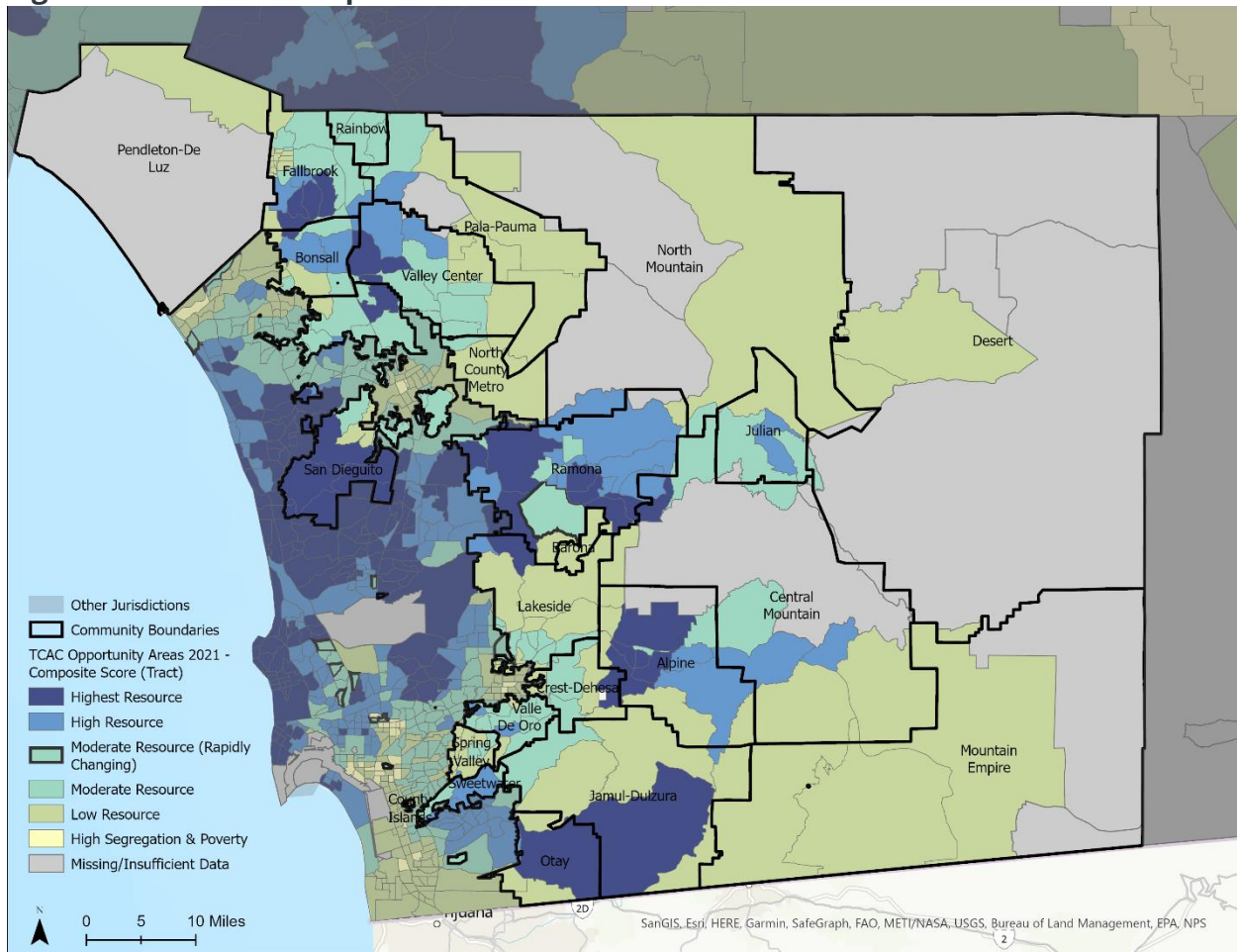
SOURCE: HCD AFFH Data and Resources Mapping Tool. May 2021.

Figure 6-I-19: TCAC Economic Score
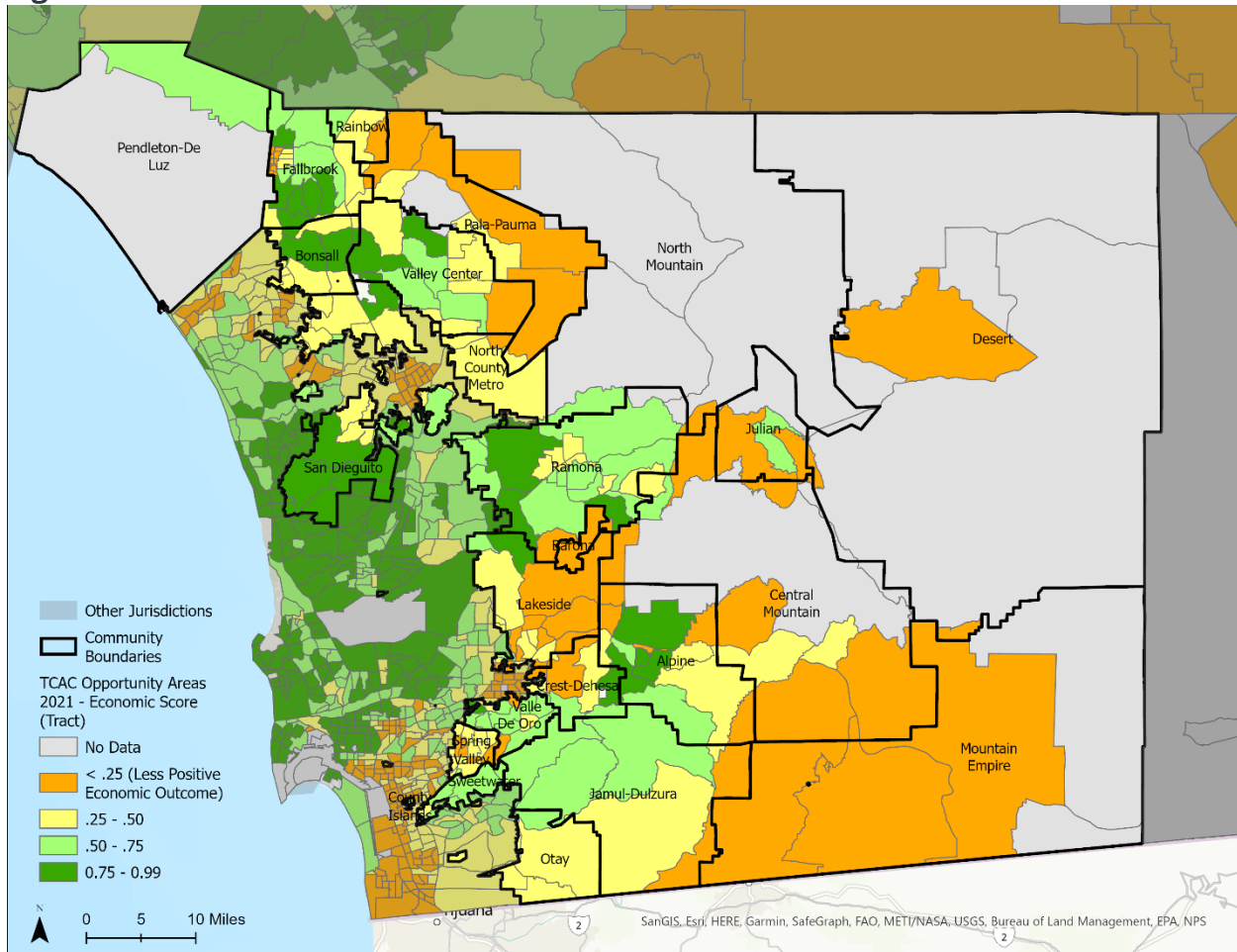
SOURCE: HCD AFFH Data and Resources Mapping Tool. May 2021.

Figure 6-I-20: TCAC Education Score
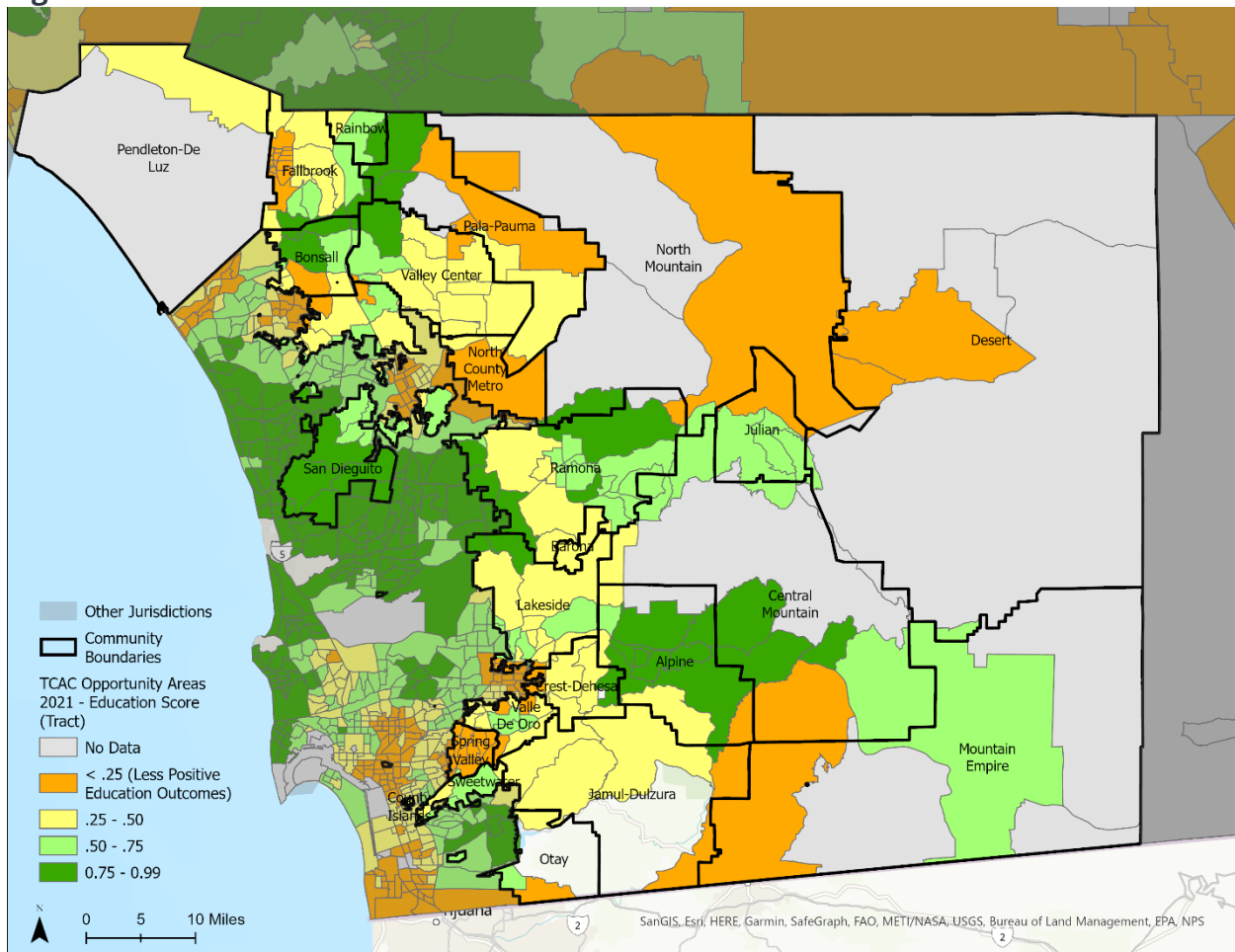
SOURCE: HCD AFFH Data and Resources Mapping Tool. May 2021.

Figure 6-I-21: TCAC Environmental Score
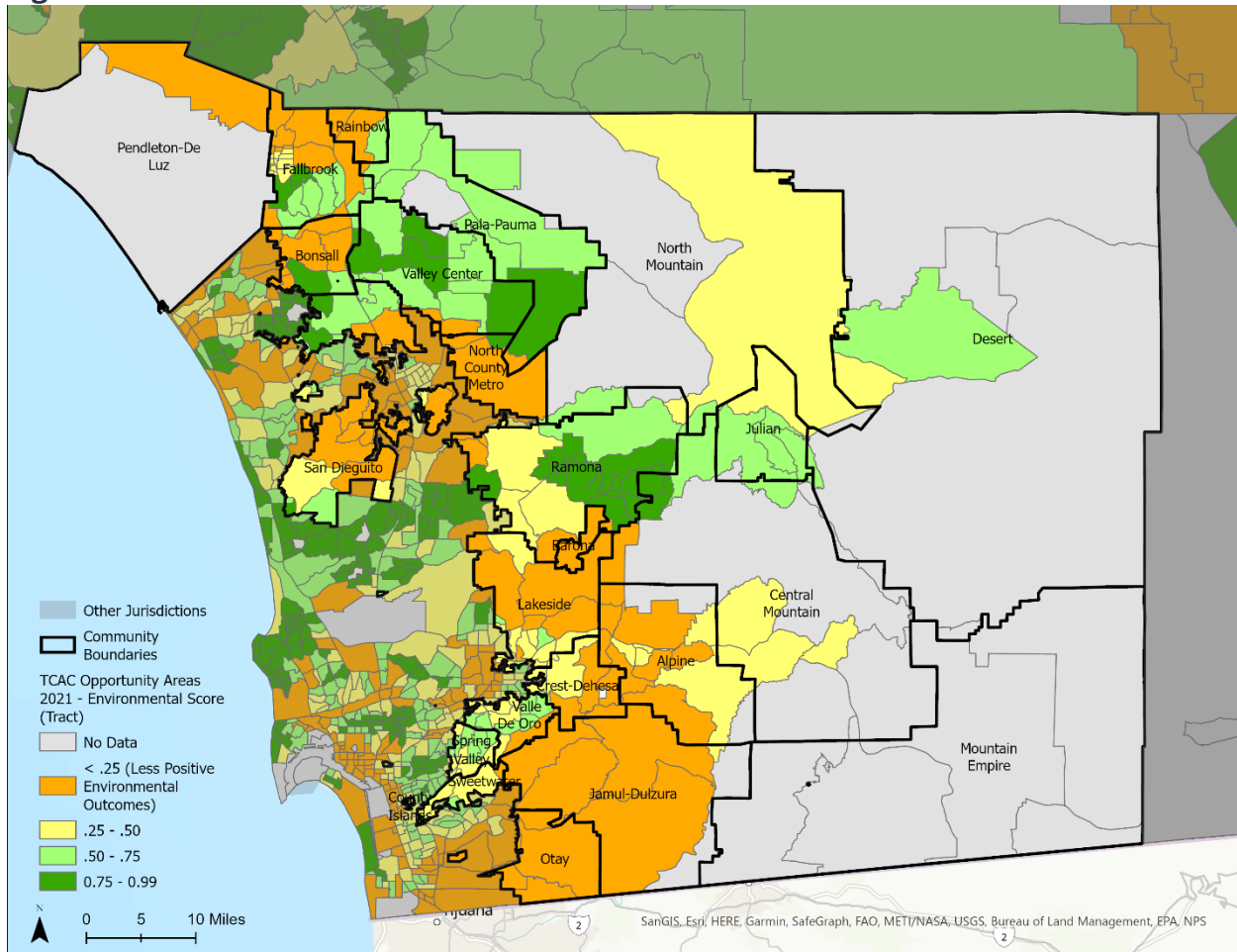
SOURCE: HCD AFFH Data and Resources Mapping Tool. May 2021.

TCAC Regional Trends and Patterns

Figure 6-I-22 compares the mean and median TCAC percentile scores for San Diego County as a whole with that of the unincorporated County. It displays the mean and median for the environmental, economic, and education scores. Generally, the unincorporated County has slightly lower TCAC percentile scores in each category than the whole of the County. The difference in percentile scores for environmental, economic, and education scores are 0.067, 0.049 and 0.066, respectively. Regional trends show higher education and economic scores in coastal and central county areas. Environmental outcomes in the region vary more geographically than economic or educational outcomes.

Figure 6-I-22: Regional TCAC Percentile Comparison
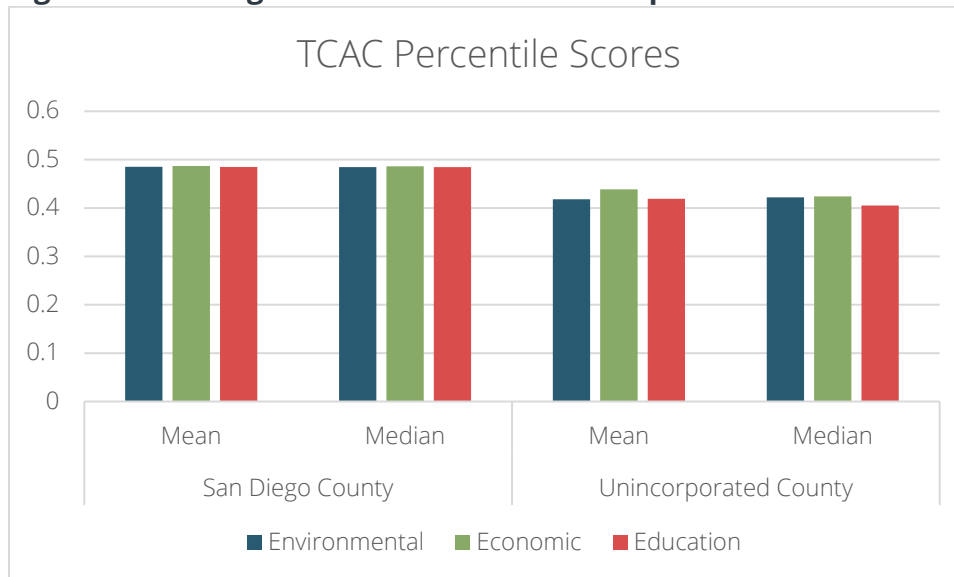
Figure 6-I-23 compares the percentage of census tracts in each TCAC category. The unincorporated County has a lower percentage of tracts in the highest and high resource categories by 5% and 4%, respectively. They unincorporated County also has a higher percentage of low and moderate resource tracts, by about 6% in both categories. Compared to the region as a whole, the unincorporated County has lower proximity to job centers, is less dense and is generally less accessible via public transit.

Figure 6-I-23: Regional TCAC Composite Category Comparison
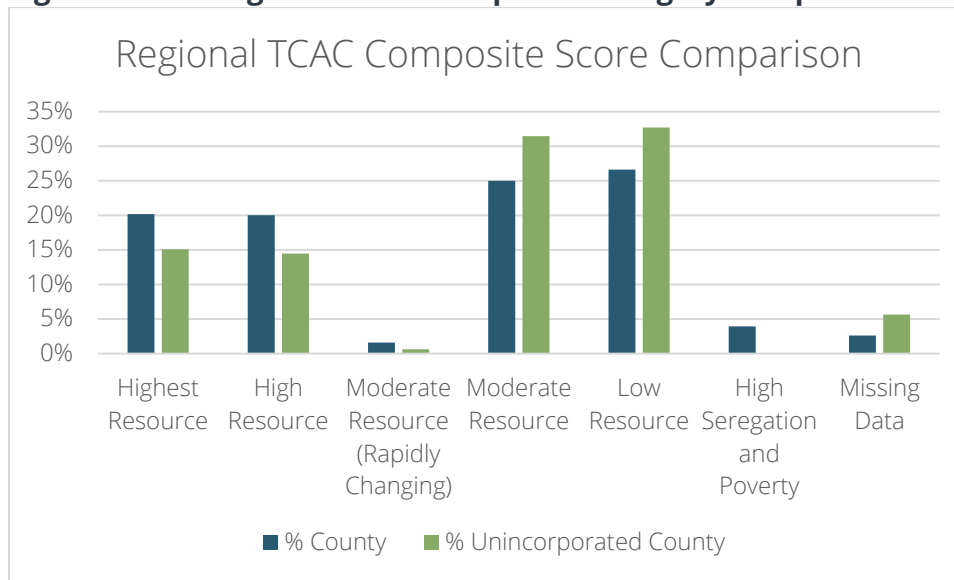
Summary of Access to Opportunities

- Native American, Black, and Hispanic residents were more likely to have limited access to opportunities like lower exposure to poverty, high quality schools, high labor force participation, and proximity to jobs. Contributing factors include decades of redlining and discriminatory lending and rental practices that limited the ability of persons of color to own property and build wealth. This resulted in generations of lost opportunity, increased housing cost burden that led to decreased wealth and household income, and increased poverty. These lower income households of color were then limited to the relatively few and smaller areas with higher density- and lower-income housing. This led to a concentration of lower income and racially segregated households.

- Several areas were noted as having low resource areas, including four small census tracts that cover the town center in western Fallbrook, the Pala-Pauma Valley area, North County Metro, Spring Valley, Barona, and Lakeside, and the backcountry areas in the eastern portions of the County. These areas appear to receive relatively low resource rankings for other components such as local school proficiency, higher concentrations of poverty, educational attainment and household income relative to nearby populations in the incorporated cities and wealthier suburban communities. Within the unincorporated County, the urbanized village areas of Fallbrook, Spring Valley, Lakeside and North County Metro have among the most access to resources in terms of proximity to infrastructure, higher density and relatively more affordable housing, local employment centers, transportation, and commercial and professional services. These areas are identified as Smart Growth communities on the SANDAG Smart Growth Concept Map with the intent

and implication of long-term planning, programmatic and capital improvements as part of the regional plan. These long-term commitments mean these areas will be improved through a combination of public and private investment that will improve the resources and opportunities, and quality of life.

▪ Casa de Oro has remained largely unchanged since the late 1970s. Prior to the 94-eastbound extension to Avocado Boulevard in early 1969-1970, Kenwood Drive was the end of the road on the 94 and contained the only shopping area for miles. The extension of the highway separated the area and by-passed Casa de Oro. This allowed other nearby shopping centers to open during the mid-1970s and the commercial center of Casa de Oro never recovered. This may contribute to a lack of opportunity and prevalence of both legal and illegal uses, particularly liquor stores and marijuana shops along Campo Road.

DISPROPORTIONATE HOUSING NEEDS

Housing Problems

Housing problems for the unincorporated County were calculated using HUD's 2020 Comprehensive Housing Affordability Strategy (CHAS) data based on the 2013-2017 ACS. *Table 6-I-4* breaks down households by race and ethnicity and presence of housing problems including cost burden for the unincorporated County households. The following conditions are considered housing problems:

▪ Substandard Housing (incomplete plumbing or kitchen facilities)

▪ Overcrowding (more than 1 person per room)

▪ Cost burden (housing costs greater than 30% gross household income)

Table 6-I-4: Housing Problems by Race/Ethnicity

Race/Ethnicity	With 1 or More Housing Problem		Cost Burden		Total Households
	Total	Percent	Total	Percent	
White, non-Hispanic	45,825	41.4%	44,185	40.0%	110,565
Black/African American, non-Hispanic	3,654	60.9%	3,442	57.3%	6,003
Asian, non-Hispanic	2,360	32.7%	2,105	29.1%	7,227
American Indian/Alaska Native, non-Hispanic	470	24.9%	398	21.1%	1,885
Pacific Islander, non-Hispanic	386	60.0%	382	59.4%	643
Hispanic, any race	16,432	53.5%	14,095	45.9%	30,690
Other (including two or more races), non-Hispanic	1,628	47.6%	1,567	45.8%	3,423
Total	70,755	44.1%	66,174	41.2%	160,436

SOURCE: HUD CHAS Data (2013-2017 ACS), April 2021.

In the unincorporated County, 44 percent of households experienced one or more housing problems. The unincorporated County had a slightly higher proportion of households with a housing problem compared to the County, where 43 percent of households had a housing problem. In the unincorporated County, Black, Pacific Islander, and Hispanic households have the highest instance of housing problems. Approximately 61 percent of Black households, 60 percent of Pacific Islander households, and 53 percent of Hispanic households experience one or more housing problems, compared to 24 percent of American Indian households, 33 percent of Asian households, 41 percent of White, non-Hispanic households.

As shown in *Figure 6-I-24*, census tracts with high proportions of households with problems (burdens) are located throughout the County. However, census tracts with the highest concentration of households with housing problems (over 43 percent) are located in the Northwestern and Southwestern areas of the unincorporated County and the eastern part of the County.

Figure 6-I-24: Housing Problems By Census Tract
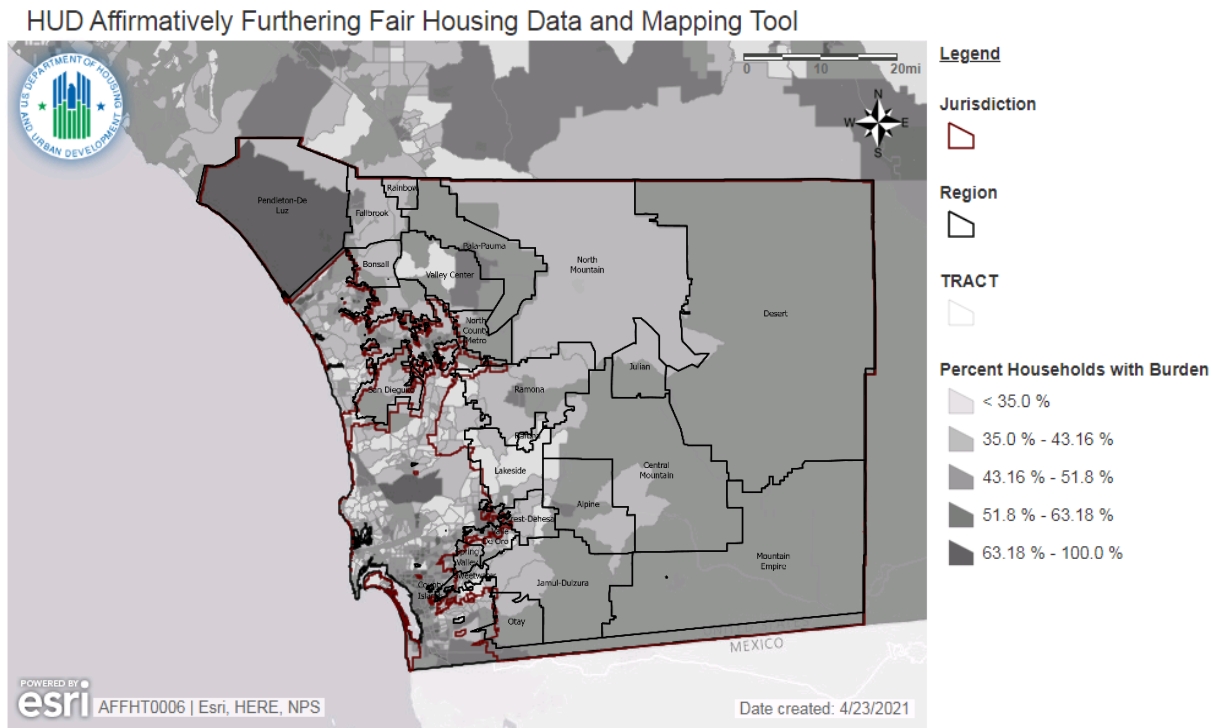
SOURCE: HUD AFFH Data and Mapping Tool. AFFHT006, July 2020.

Cost Burden

A household is considered cost burdened if it spends more than 30 percent of its gross income on housing. As stated in *Appendix 6-A*, lower income households, especially renters, experience cost burdens. Overall, 44 percent of the households in the unincorporated area experienced housing cost burden according to the 2014-2018 ACS (*Table 6-A-34: Cost Burden by Household Income and Tenure—Unincorporated County: 2014-2018*). Renter households (62 percent) were more severely impacted by cost burden compared to 36 percent of owner households. Among both owner and renter households, the extremely low-income households faced the greatest burden.

As *Table 6-I-4* shows, some ethnic/minority households are also disproportionally affected by cost burdens. Black (57 percent), Pacific Islander (59 percent), Hispanic (46 percent) and other race households (46 percent) experience cost burden at higher rates than the unincorporated

County overall (41 percent), white (40 percent), Asian (29 percent), and American Indian (21 percent) households. Contributing factors may include decades of discriminatory housing practices including redlining that limited housing opportunities, increased housing costs, and limited opportunity to build wealth through home and property ownership for persons of color. The effects can persist for generations. In contrast, white households were able to get loans, buy property, and build and pass along family wealth. This wealth was invested in property that increased in value beyond the means of lower-income households. Single-family zoning was also used as a means of increasing housing costs and segregating communities based on income. This increased the wealth gap and exacerbated the housing access and household wealth problem.

Figure 6-I-25 shows the percentage of renters households in San Diego County considered "cost-burdened," (spending more than 30% of their household income on housing costs) According to this map, the highest concentration of cost-burdened renters is located on the northwestern, southwestern, and eastern tracts of the unincorporated County. The communities of Pendleton-DeLuz, Bonsall, Valley Center, Lakeside, Alpine, Central Mountain, Valle de Oro, Spring Valley and Sweetwater all contain one or more census tracts with more than 60% of renter households paying more than 30% of household income. This tends to match the housing problems map above *(Figure 6-I-24)*. A comparison of the 2010-2014 and 2015-2019 maps shows that the percentage of renter households that are cost burdened increased between the two periods in most areas of the unincorporated County including Desert, eastern Alpine, western Central Mountain, Valley Center, Bonsall, Barona and Lakeside. A few areas experienced a reduced rental cost burden including northern Central Mountain, Pala-Pauma, Jamul-Dulzura and Otay. These are all rural areas where housing costs (rents) may have not increased at the same pace as renter household income due to relatively little demand.

A comparison of the burdened renter and homeowner households shows that renters generally carry a higher housing cost burden than homeowners.

Figure 6-I-26 displays overpayment by homeowners in the unincorporated County. This map shows a similar pattern where the northwestern, eastern and southern portions of the unincorporated County have the highest percentages of housing cost burdened households. A comparison of the 2010-2014 and 2015-2019 maps shows that percentage of housing cost burdened households in the majority of the unincorporated County generally decreased or remained the same over the period. However, the number of housing cost burdened households increased in the Mountain Empire and Desert communities in the eastern backcountry areas. These communities experienced the opposite trend for owner households (increased burden) as experienced for renters (decreased burden). This may be explained by

the relative mobility of renters versus homeowners. It is possible that renters were able to move to housing that is more affordable whereas homeowners may have experienced increased costs and/or decreased household income, but were unable to move or otherwise reduce their costs to match their income.

Figure 6-I-25: Overpayment by Renters by Census Tract, 2010-2014 and 2015-2019
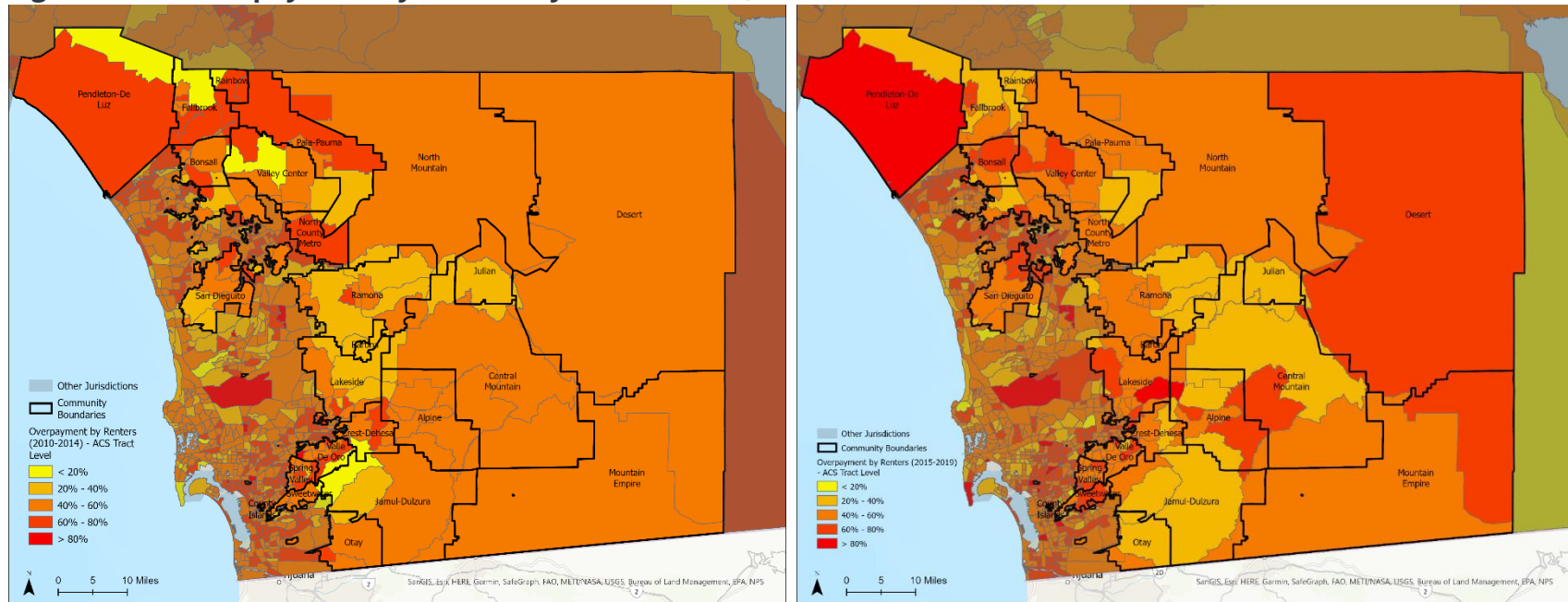
SOURCE: HCD AFFH Data and Resources Mapping Tool, US Census ACS 2015-2019.

Figure 6-I-26: Overpayment by Homeowners by Census Tract, 2010-2014 and 2015-2019
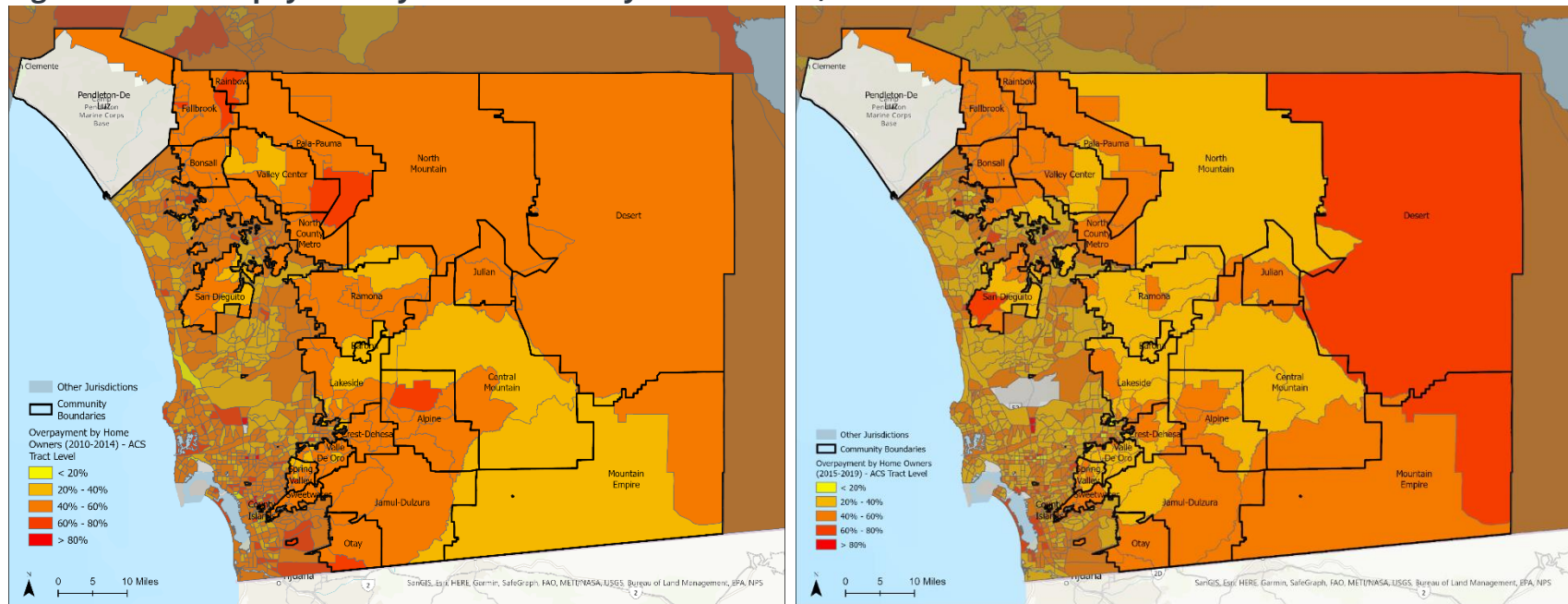
SOURCE: HCD AFFH Data and Resources Mapping Tool, US Census ACS 2015-2019.

Overcrowding

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). According to the 2018 five-year ACS estimates, a lower percentage of households in the unincorporated County (5.0 percent) are living in overcrowded conditions than the County (6.7 percent). Overcrowding tends to affect renter households disproportionately, with 9.1 percent of all renter households compared to nearly 2.5 percent owner-households in the unincorporated area being overcrowded (*Table 6-I-5*). Overcrowding also disproportionately affects lower income households, regardless of tenure. *Figure 6-I-27* shows the percent of households that are overcrowded by census tract, as compared to the statewide average of 8.2 percent. The majority of census tracts in the County are at or below the state average. Census tracts with higher rates of overcrowding are spread throughout the County and are not clustered in one geographic area. These areas included a few small census tracts in western Fallbrook and Ramona, Spring Valley, Valle de Oro, and the Pala-Pauma and Mountain Empire areas.

Table 6-I-5: Overcrowding per Tenure and Income Level

Income Level	>1 Person per Room (renter)		>1 Person per Room (owner)		>1 Person per Room (Overcrowded)		>1.5 Persons per Room (Severely overcrowded)	
	Total	Percent	Total	Percent	Total	Percent	Total	Percent
0-30% HAMFI	1,080	10.4%	191	2.2%	1,271	6.6%	375	1.9%
31-50% HAMFI	1,212	10.9%	329	3.6%	1,541	7.7%	555	2.8%
51-80% HAMFI	1,410	11.8%	731	4.5%	2,141	7.6%	741	2.6%
81-100% HAMFI	523	8.5%	442	4.4%	965	5.9%	204	1.3%
>100% HAMFI	495	4.0%	1,031	1.6%	1,526	2.0%	346	0.5%
Total	4,720	9.1%	2,724	2.5%	7,444	4.6%	2,221	1.4%

SOURCE: HUD CHAS Data (2013-2017 ACS).
NOTE: HAMFI = HUD Area Median Family Income

Figure 6-I-27: Overcrowded Households by Census Tract
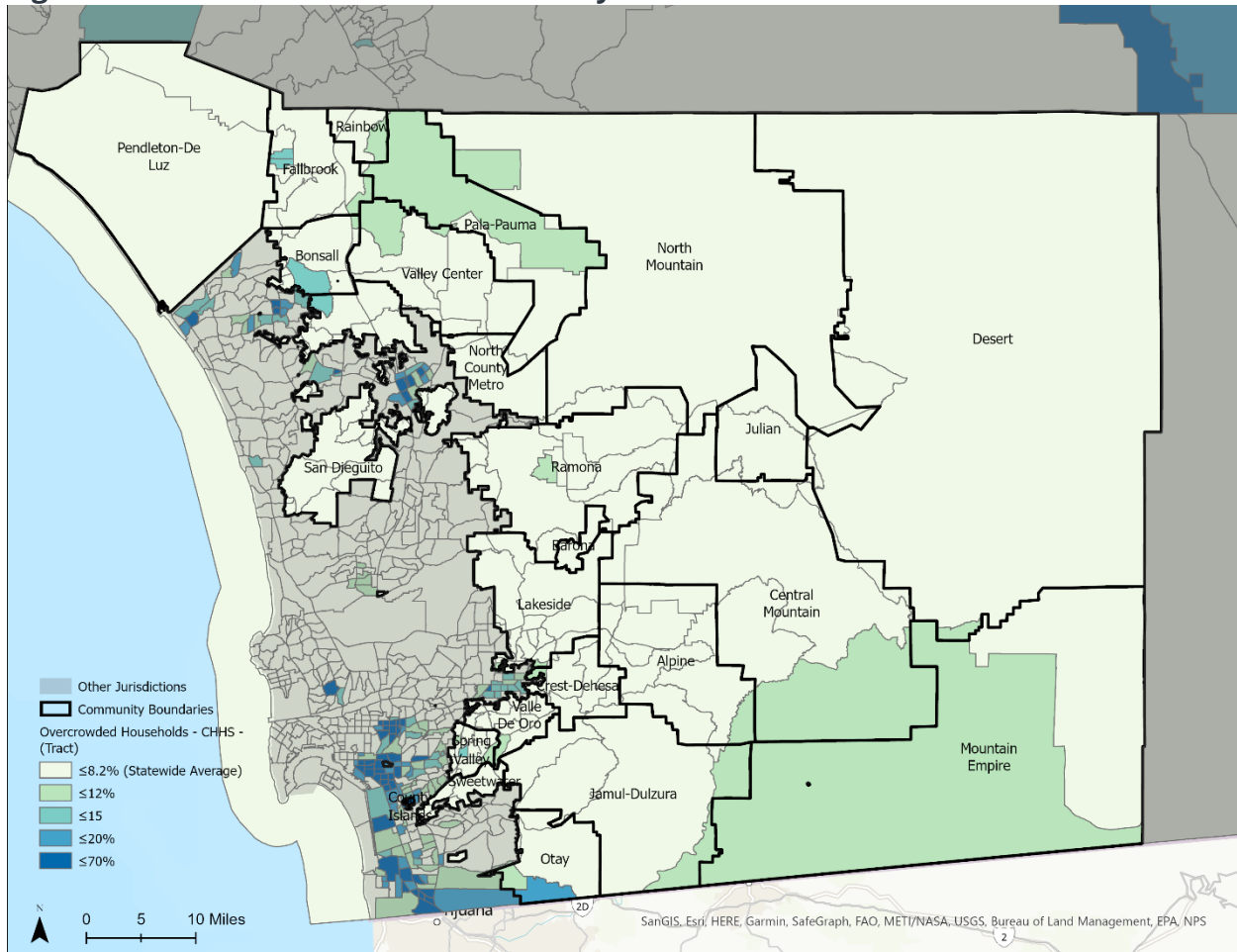
SOURCE: HCD AFFH Data and Resources Mapping Tool, CHHS.

Substandard Housing

Incomplete plumbing or kitchen facilities can be used to measure substandard housing conditions. In the unincorporated County, only 0.6 percent of households lacked complete plumbing or kitchen facilities (*Table 6-I-6*). San Diego County had a similar percentage of households lacking complete plumbing or kitchen facilities (0.9 percent). Lower income households were disproportionately affected by substandard facilities in both the unincorporated County and the County overall. For example, 1.2 to 1.7% for very low and extremely low income households in the unincorporated County reported problems versus less than 0.5% of all other households. The significantly higher rate of housing problems is likely the result of the extreme housing burden and inability to make repairs and regular maintenance. The rates of housing problems are lower than the entire county including the incorporated cities for all income levels.

Table 6-I-6: Households Lacking Complete Kitchen and/or Plumbing Facilities

	Unincorporated County		San Diego County	
	Total	Percent	Total	Percent
0-30% HAMFI	325	1.7%	3,150	2.0%
31-50% HAMFI	236	1.2%	2,055	1.5%
51-80% HAMFI	97	0.3%	1,915	1.0%
81-100% HAMFI	76	0.5%	1,010	0.9%
>100% HAMFI	290	0.4%	2,305	0.4%
Total	1,024	0.6%	10,435	0.9%

SOURCE: HUD CHAS Data (2013-2017 ACS)
NOTE: HAMFI = HUD Area Median Family Income

While HUD CHAS data only reports less than 1 percent of housing units as lacking complete facilities, a report from the National Center for Healthy Housing reported the basic housing quality for the San Diego Metropolitan service area as 7.2 percent. The basic housing quality metric is based on the percentage of homes with "severe" or "moderate" housing problems. Based on this metric, the County estimates that 12,236 units of the total 172,807 reported by SANDAG 2018 estimates in the unincorporated County are in substandard condition. A discussion with County Code Compliance staff determined that there are approximately 2,000 general code compliance cases per year. About 5 percent, approximately 8,750 of the total 175,000 housing units in the unincorporated County's housing stock, are in need of repairs. Approximately 400 per year (2% of total cases), involve unsafe structures or dilapidated housing that needs severe repair or replacement. These observed trends suggest that estimated 3,500 units (2% of the total 175,000 housing units within the County) may be substandard and in need of significant repair or replacement.

Housing age is also frequently used as an indicator of housing condition. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. Over 68 percent of housing is older than 30 years old in the unincorporated County, with 24 percent being older than 50 years old (*Table 6-A-32- Appendix 6-A*). In Fallbrook, Julian, Lakeside, Rainbow, Ramona, Rancho Santa Fe (San Dieguito), and Spring Valley, a greater proportion (over 68 percent) of housing stock is over 30 years old than the overall unincorporated County. The proportion of housing stock over 50 years old in Spring Valley (32 percent) far exceeds the unincorporated proportion of 24 percent.

Displacement Risk

The Urban Displacement Project[57] defines residential displacement as "the process by which a household is forced to move from its residence - or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control." As part of this project, the team has an interactive map that display changes in neighborhood characteristics that may indicate displacement. Two key factors in visualizing displacement are the loss of low income households and increases in rent. As *Figure 6-I-28* shows, between 2000 and 2015, the unincorporated County experienced among the highest increase in median income and median gross rents occurred in along the western census tracts (North to South) of the region. These areas correspond to Pala-Pauma Valley, North Mountain, Ramona, Lakeside, and Alpine communities.

Changes in cost burdened population, especially renters, is also important to identify potential displacement. Households are at risk of being displaced when rents increase. In the unincorporated County, households in the Pala-Pauma Valley, North Mountain, North County Metro, Desert. Ramona, Lakeside, and Alpine communities had the highest increase in cost burdened renter households. The overlap between increase in cost-burned renters, increases in rent, and increases in median gross income occurred in Pala-Pauma Valley, North Mountain, Ramona, Lakeside, and the Alpine communities.

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[57] Chapple, K. & Thomas, T. (2020). Berkeley, CA: Urban Displacement Project.

Figure 6-I-28: Displacement Indicators

(A) Change in Median Gross Income (2000-2015)
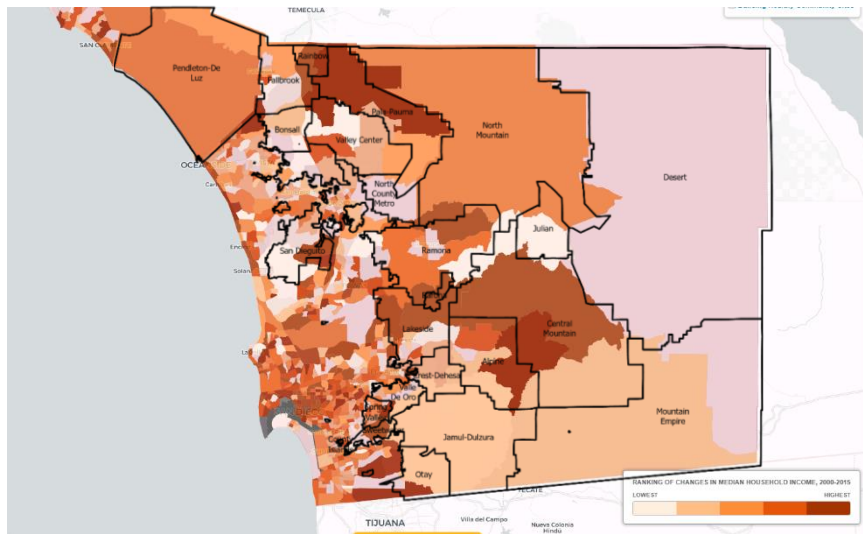
(B) Change in Median Gross Rent (2000-2015)
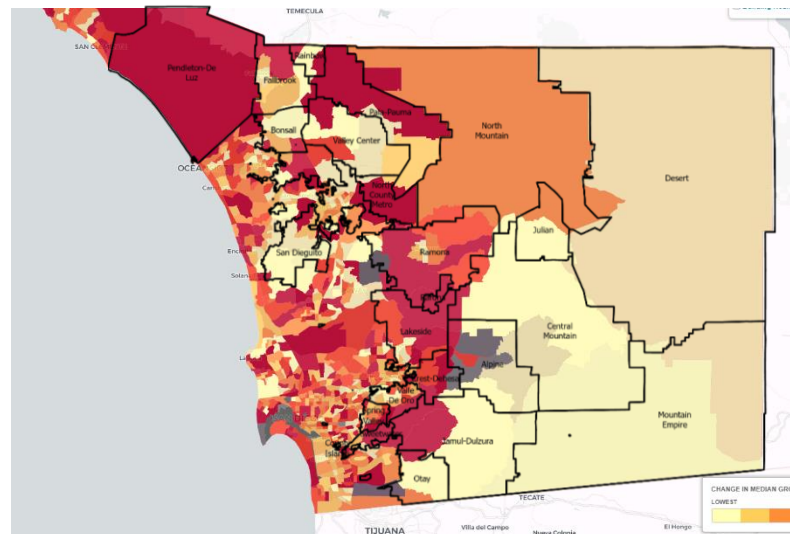
C) Change in Burdened Renter Households (2000-2015)
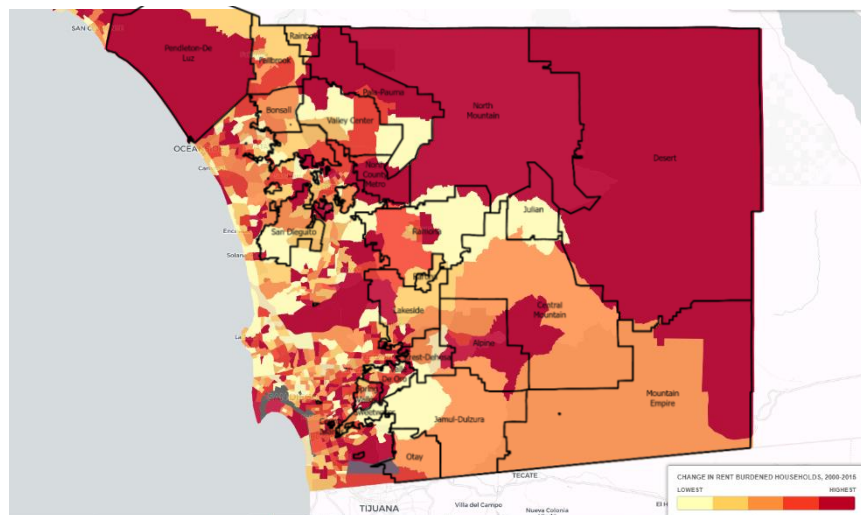
SOURCE: Urban Displacement Project. https://www.urbandisplacement.org/map/socal.

The Location Affordability Index is a tool used by HUD to provide standardized housing and transportation costs estimates for the entire United States. *Figure 6-I-29* displays this index for the County of San Diego. It shows a common and predictable pattern of increasing affordability with distance from the incorporated cities, employment centers toward the rural and sparsely populated backcountry areas including North Mountain, Desert, Mountain Empire and Jamul-Dulzura.

Figure 6-I-29: Location Affordability Index
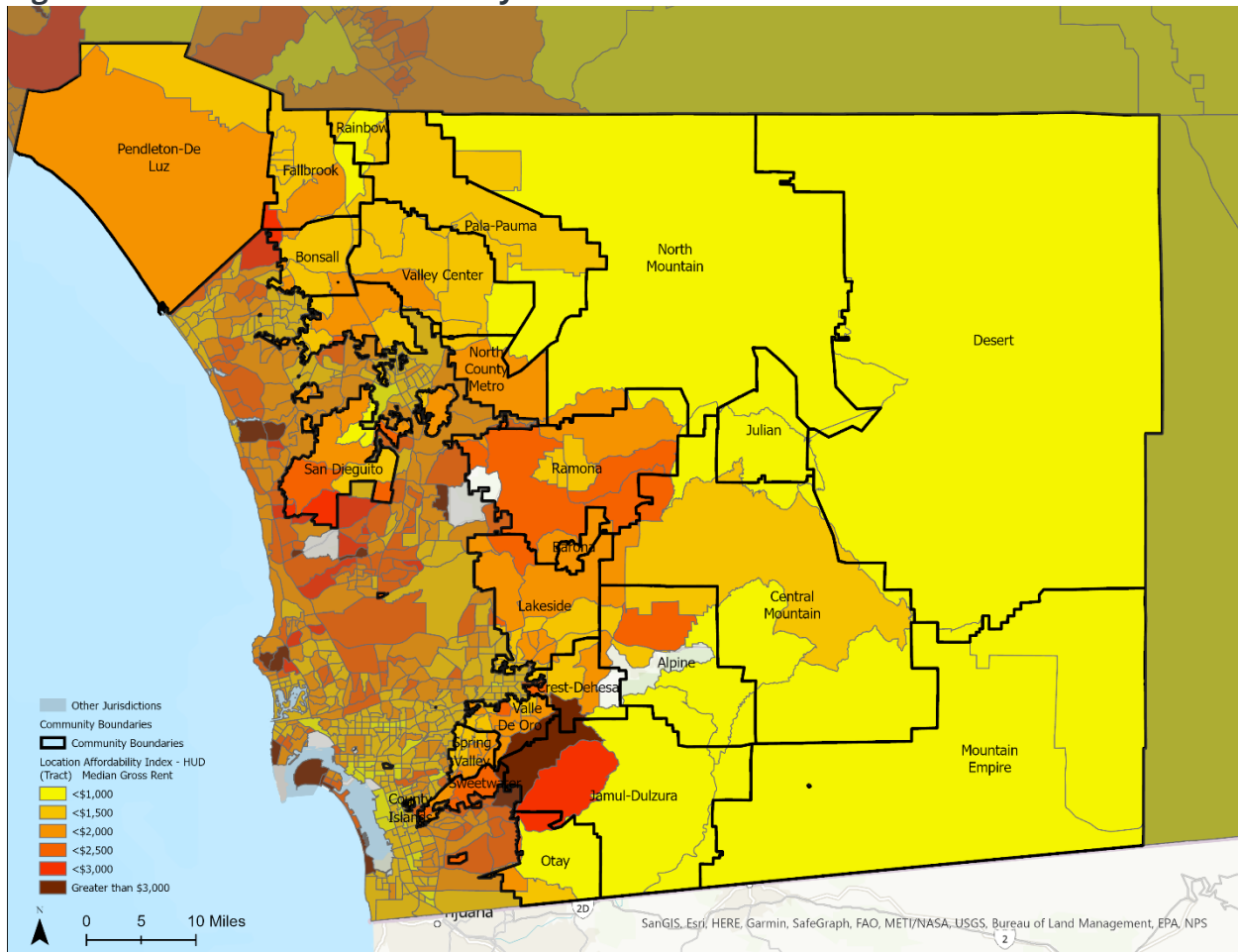
SOURCE: HCD AFFH Data and Resources Mapping Tool.

Persons Experiencing Homelessness

Persons experiencing homelessness and unhoused individuals are groups with disproportionate housing needs. As previously discussed, the RTFH is San Diego's planning body on homelessness. The RTFH's 2020 We All Count Report summarized the results from its January 2020 Point in Time Count (PITC). The PITC identified 193 total unsheltered individuals

experiencing homelessness in the unincorporated county. The PITC Counts for included unincorporated village areas are shown in *Table 6-I-7*. From 2019 to 2020, counts decreased in Alpine, Fallbrook and Lakeside but increased in Ramona and Spring Valley. The We All Count Report also notes several disparities in the homeless population as compared to the general population. For instance, Black/African Americans, make up 21% of the homeless population while only making up 4.7% of the total population. Additionally, 58% of the unsheltered homeless population is recorded as having a disability, as compared to only 10% of the total population.[58]

Table 6-I-7: PITC Homelessness Counts by Village Areas

Village Area	2020 Sheltered	2020 Unsheltered	2020 Total	2019 Total	% Change (2019-2020)
Alpine (Crest-Dehesa)	0	1	1	10	-90%
Fallbrook	0	51	51	61	-16.4%
Lakeside	0	24	24	72	-66.7%
Ramona	0	20	20	14	42.9%
Spring Valley (Casa de Oro)	0	97	97	67	44.8%
Total	0	193	193	224	-13.8%

Source: San Diego Regional Task Force on the Homeless. 2020. WeAllCount Results. https://www.rtfhsd.org/wp-content/uploads/WeAllCount.pdf. Accessed July 2021.

Though the PITC provides a snapshot of populations experiencing homelessness within the urban areas of San Diego County, it does not provide a count of homelessness in the rural parts of the county. Rural homelessness is more difficult to estimate, and the rural homeless population may face greater lack of access to resources and services than the population experiencing homelessness in urban areas. HUD's 2020 Annual Homeless Assessment Report to Congress found that there are lower numbers of people experiencing homelessness in rural areas and that they are disproportionately White compared to the rest of the population.[59]

Regionally, the 2020 PITC saw a 6% decrease in the total number of those experiencing homelessness. There was. an 11% decrease in unsheltered individuals throughout San Diego County. [60] However, the point-in-time count was conducted prior to the COVID-19 crisis. With skyrocketing unemployment rates throughout the state, homelessness is expected to increase. As of June 2020, the preliminary unemployment rates from the California Employment

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[58] San Diego Regional Task Force on the Homeless. 2020. WeAllCount Results. https://www.rtfhsd.org/wp-content/uploads/WeAllCount.pdf. Accessed June 2021.

[59] HUD 2020 Annual Homeless Assessment Report to Congress https://www.huduser.gov/portal/sites/default/files/pdf/2020-AHAR-Part-1.pdf

[60] San Diego Regional Task Force on the Homeless. 2020. WeAllCount Results. https://www.rtfhsd.org/wp-content/uploads/WeAllCount.pdf. Accessed July 2020.

6TH CYCLE HOUSING ELEMENT UPDATE
APPENDIX 6-I ▪ AFFIRMATIVELY FURTHERING FAIR HOUSING

Development Department reported a countywide unemployment rate of nearly 14 percent in San Diego. However, certain CPAs have higher unemployment rates: Bonita (20 percent) and Spring Valley (19 percent). Prior to the original COVID-19 Shelter-in-Place Order issued in March 2020, the countywide unemployment rate was reported at 4 percent.

Table 6-I-8 summarizes the 2020 PITC results for the region. The unincorporated County accounts for only 2.5% of the region's individuals experiencing homelessness as recorded by the PITC. The City of San Diego accounts for the largest percentage of individuals experiencing homelessness at 64.1%. Regionally, the PITC decreased by 12.3% from 2016-2020. Every geographic area except East County saw their PITC decrease throughout that period.

**Table 6-I-8: Individuals Experiencing Homelessness Estimates—
County of San Diego: 2020**

	Sheltered	Unsheltered	Total	% by Region	% Change (2016-2020)	% Change (2019-2020)
City of San Diego	2,604	2,283	4,887	64.1%	-4.0%	-3.8
East County	474	527	1,001	13.1%	49.9%	-4.8
North County Inland	214	409	623	8.2%	-46.2%	-19.7
North County Coastal	252	383	635	8.3%	-27.5%	-16.9
South County	104	369	473	6.2%	-47.2%	10.5
San Diego County	3,648	3,971	7,619	100%	-12.3%	-6.0
Unincorporated	0	193	193	2.5%	-42.6%	-13.8

SOURCES: San Diego Regional Task Force on the Homeless, 2020 WeAllCount. San Diego County Housing Element, 2014-2021.

As a means to combat homelessness, HCDS participates as a member of the Governance Board for the Continuum of Care (CoC) and in general membership. The CoC is a regional planning body of more than 550 stakeholders that coordinate housing and services for homeless families and individuals; these housing options include rapid re-housing, emergency, permanent supportive housing, and prevention programs to keep "at risk" people from becoming homeless.

Summary of Disproportionate Needs and Displacement Risk

- Renters experienced greater housing cost burdens as well as greater increases in household costs than owner households.

- Owner households in most communities in San Diego generally saw a reduced housing burden trend since 2010.

- Lower income households were disproportionately affected by substandard facilities in both the unincorporated County and the County overall (1.2 to 1.5% for very low and

extremely low income households reported problems versus less than 0.5% of all other households). The significantly higher rate of housing problems is likely the result of the extreme housing burden and inability to make repairs and regular maintenance.

▪ Overcrowding above the State average was noted in four census tracts in western Fallbrook and Ramona, and the Pala-Pauma and Mountain Empire areas.

▪ The Pala-Pauma Valley, North Mountain, Ramona, Lakeside, and the Alpine communities are areas of high risk for displacement due increases in cost-burned renters, increases in rent, and increases in median gross income.

▪ Backcountry Communities have more limited access to infrastructure, which may contribute to conditions associated with substandard housing.

OTHER CONTRIBUTING FACTORS

Zoning and Land Use Planning

Zoning and land use planning is a contributing factor to a lack of housing options and fair housing choice issues. Based on the AFFH review, many of the communities of note (discussed below) are within the more intense areas of the unincorporated County. While these higher-density uses are largely clustered around jobs and transit, high concentrations of multi-family uses, along with a lack of multi-family housing options in other areas, contribute to communities with disproportionate needs and income-based spatial segregation.

The unincorporated areas with the most multi-family housing (Lakeside/Bostonia, Spring Valley, and Fallbrook) tend to have lower median incomes and higher racial/ethnic minority populations than the unincorporated County as a whole. Many of the County's multi-family housing stock is older in nature, making it more naturally affordable than new multi-family or single-family homes.

The single-family neighborhoods in the unincorporated County tend to have higher median incomes, likely due to the higher price of single-family homes acting as a barrier to entry for lower and moderate-income households. Therefore, zoning or land use regulations that limit housing typology to single-family homes may be a contributing factor to a lack of fair housing choice.

Nearly half of the County's Village zoning limits building types to single-family residential typology (building types B, C, D), while only 30 percent of parcels allow some form of multi-family development, including duplexes (building types E through V). This lack of zoning for "missing middle" housing types may contribute to concentrations of disproportionate needs and income segregation in the unincorporated areas. Based on this review, the County is including three

programs to further allow and incentivize different multi-family typologies in higher resource areas: 3.6.5.A will remove constraints to the development of multi-family housing, and programs 3.1.1.C and 3.1.1.D will allow and incentivize different building types (such as duplexes) where they are currently not allowed due to the building type designator. This program will apply to the County's RCAA, and encourage new and more affordable housing typologies in RCAAs.

Community Opposition to Housing

Community opposition to new housing may also be a contributing factor to a lack of housing choices in the unincorporated area. While many projects are approved ministerially, some projects with discretionary level review attract community opposition to new housing. Oftentimes, this leads to appeals to the Planning Commission or Board of Supervisors, or threats of litigation pursuant to CEQA. On a larger scale, opposition to new housing makes it more challenging to adopt more comprehensive zoning and land-use reforms. Several recent projects have been appealed or litigated, increasing the costs and timeline for approval. The County is going to implement a program (3.5.1.A) to educate residents about the benefits of new housing with the goal of mitigating community opposition to new housing projects.

Mortgage Lending

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 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. 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. *Table 6-I-9* through *Table 6-I-10* examine detailed 2017 HMDA data for the unincorporated County and San Diego County.

Approval, and denial rates did not change much for the incorporated County between 2012 and 2017 (*Table 6-I-9*). Approval and denial rates in 2017 also did not differ between the unincorporated County and San Diego County overall in 2017. About 63 percent of applicants were approved for loans in 2017.

Race composition of the applicant pool was similar for the unincorporated County and the entire San Diego County (*Table 6-I-10*). The majority of applicants were white (58 percent in the unincorporated County and 48 percent in the San Diego County), followed by Hispanics at a

distant 10 and 15 percent. Hispanics were greatly underrepresented, making up only 10 percent of the unincorporated County's applicant pool but 30 percent of the unincorporated County's population. By contrast, White and Asian applicant pools reflected the population makeup. In the San Diego County, Hispanics were also greatly underrepresented in the applicant pool.

Table 6-I-9: Disposition of Home Loans 2012 and 2017

Jurisdiction	Total Applicants		Percent Approved		Percent Denied		Percent Other[1]	
	2012	2017	2012	2017	2012	2017	2012	2017
Unincorporated County								
Government Backed Purchase	1,477	1,816	72.0%	76.8%	14.8%	8.8%	13.2%	14.5%
Conventional Purchase	1,830	3,127	70.8%	67.0%	15.4%	13.5%	13.8%	19.6%
Refinance	12,191	7,825	67.7%	57.9%	16.9%	17.1%	15.4%	25.0%
Home Improvement	437	965	51.9%	60.7%	36.8%	23.3%	11.2%	16.0%
Total	15,935	13,733	68.0%	62.7%	17.1%	15.6%	14.9%	21.7%
San Diego County								
Government Backed Purchase	15,141	13,515	74.6%	77.1%	12.8%	7.6%	12.6%	15.2%
Conventional Purchase	26,952	37,949	75.6%	72.0%	11.3%	9.7%	13.1%	18.4%
Refinance	155,940	74,811	70.8%	58.0%	15.0%	17.7%	14.2%	24.3%
Home Improvement	4,205	9,621	60.3%	59.7%	29.6%	23.1%	10.1%	17.1%
Total	202,238	135,896	71.5%	63.9%	14.6%	14.8%	13.9%	21.2%

SOURCE: www.lendingpatterns.com, 2020.

Note: 1. "Other": Withdrawn/Incomplete

Table 6-I-10: Demographics of Loan Applicants vs. Total Population

Jurisdiction	Percent of Applicant Pool	Percent of Total Population	Variation
Unincorporated County			
White	58.3%	55.5%	2.8%
Black	2.8%	4.4%	-1.6%
Hispanic	10.2%	29.6%	-19.6%
Asian	2.5%	6.1%	-3.5%
San Diego County			
White	48.2%	45.8%	2.4%
Black	2.8%	4.4%	-1.6%
Hispanic	15.0%	34.6%	-19.6%
Asian	9.0%	10.9%	-1.9%

SOURCE: www.lendingpatterns.com, 2020. 2013-2017 ACS 5-Year Estimates.

Note:

1. Percent of applicant pool does not take into account applicants indicated as "MultiRace" or whose race was" Unk/NA". Therefore, total percentage of applicant pool does not add up to 100%.

2. Percent of total population estimates are based on 2018 ACS 5-year estimates and compared to 2017 applicant data

Redlining

During the 1930s, the Home Owners Loan Corporation (HOLC) evaluated and rated neighborhoods across the United States for suitability of investment and mortgage lending. Areas that were marked 'A', or green were seen as the best places for investment, while those marked 'C' or 'D' were seen as risky locations. The HOLC ratings were heavily influenced by the existing population of the neighborhood, and communities with high numbers of minority residents were "redlined," making it difficult for them to obtain mortgages or other investments.

While there were no areas of the unincorporated County that were redlined, there is direct adjacency of redlined areas to Spring Valley and Lincoln Acres. As the region urbanized and development spread eastward, minority communities that were previously constrained to redlined areas may have also moved east. Even though these neighborhoods were not directly graded by HOLC, the proximity to redlined neighborhoods in nearby cities could be a contributing factor to large minority populations in Spring Valley and Lincoln Acres.

Figure 6-I-30: Home Owners Loan Corporation Redlining Grade
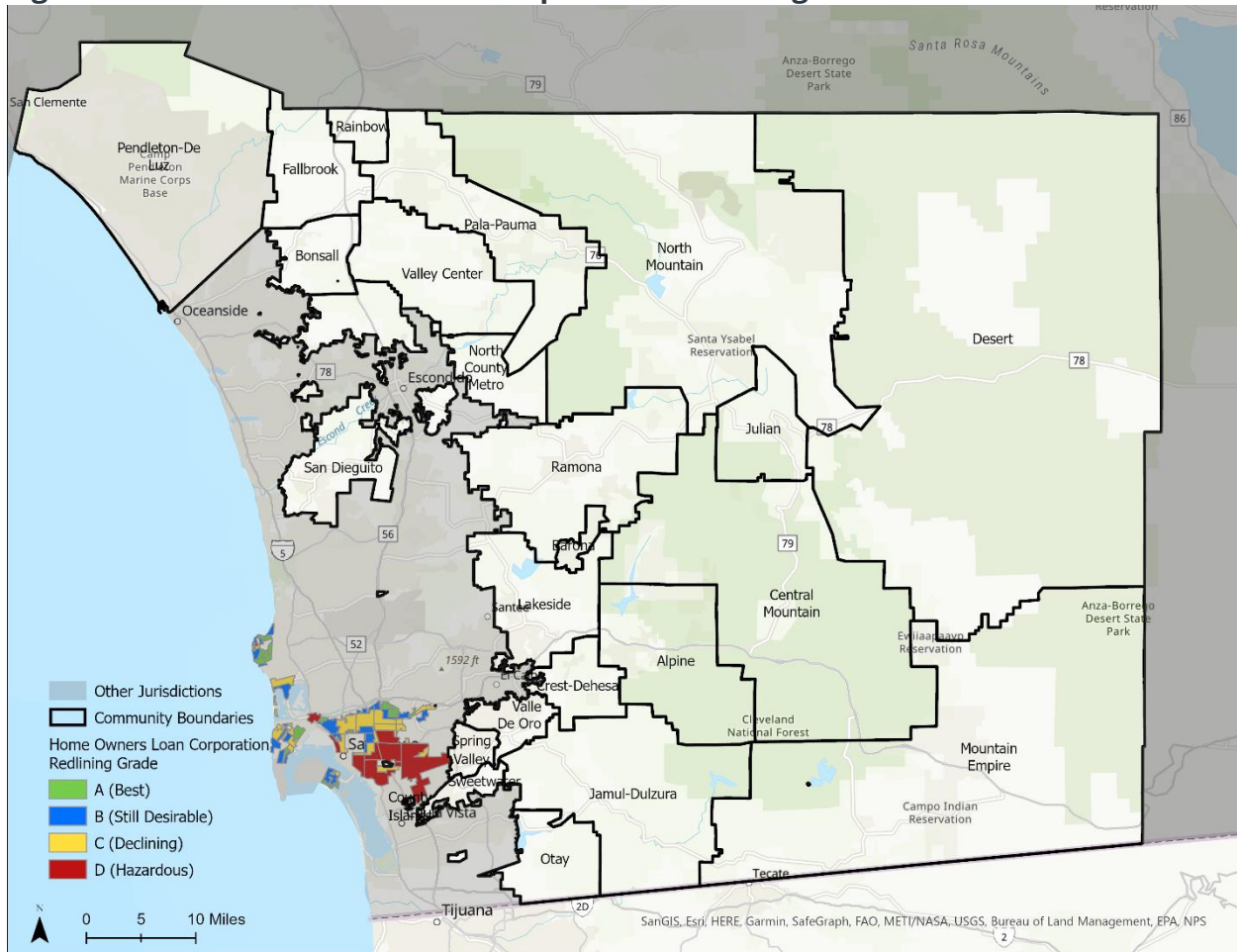
SOURCE: HCD AFFH Data and Resources Mapping Tool. 2021

SUMMARY OF FAIR HOUSING ISSUES

Following an analysis of integration and segregation, access to opportunity, and disproportionate housing needs and displacement risk, fair housing issues can be broadly summarized as follows:

▪ Areas with higher concentration of racial/ethnic minority populations and lower incomes have lower access to opportunities, as defined by the California TCAC.

▪ Urbanized areas of the County have higher percentages of minority populations and segregation indices.

▪ There are no R/ECAPs in the unincorporated County.

- Renters had disproportionately higher housing cost burdens, had higher housing cost increases, were more likely to experience overcrowding, and were at a higher risk of displacement than homeowners.

- Rural and backcountry portions of the County demonstrated higher and increased rates of poverty and housing burden than higher density areas.

- Several planning areas and neighborhoods show up in multiple fair housing evaluation criteria and suggest that these areas may require more evaluation, attention, and possible focused intervention with fair housing programs or place-based improvements.

Planning Areas and Neighborhoods of Note

Throughout the assessment of fair housing, there are some planning areas or specific neighborhoods within a planning area that repeatedly appear in the spatial analyses. Descriptions and reasons for these are provided to better summarize the assessment of fair housing.

Pendleton-DeLuz Planning Area

The Pendleton-DeLuz planning area frequently appears as a community of need or low resource in the fair housing analysis; however, over 90% of this area is comprised of the Marine Corps Base Camp Pendleton and Cleveland National Forest. As such, the County has little to no control over land use and development in the area. The planning area is mostly occupied by active duty marine core and military family. Camp Pendleton houses over 42,000 active duty personnel and 38,000 military family members on base.[61]

Fallbrook

Fallbrook consists of approximately 30,000 people and is located directly east of Camp Pendleton. The community, especially census tracts bordering Camp Pendleton have higher levels of segregation, lesser access to opportunities, and possibly have disproportionate housing needs. Fallbrook is identified as a drive through community for the military base. As such, its proximity and relationship to Camp Pendleton area contributing factors that affect fair housing in the area.

Additionally, parts of Fallbrook have strong agricultural employment bases due to the surrounding orchards and rolling hills. These different employment bases and prevalence of seasonal labor could be contributing factors to cost burdened or overcrowded households.

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[61] US Department of Defense: https://installations.militaryonesource.mil/in-depth-overview/camp-pendleton

Fallbrook has a town center near the western boundary. In 2014 the County adopted specific Village Regulations for the town center because of the unique mix of higher density housing and higher intensity commercial uses. The County recently initiated a subarea plan to promote additional housing and physical improvements to revitalize the town center area.

Bostonia/Lakeside

Bostonia is a neighborhood in the southern part of the Lakeside planning area, adjacent to the City of El Cajon. Viewed on a sub-regional basis, the geographic trends and patterns of Bostonia tend to align more with the City of El Cajon than with the rest of Lakeside. Bostonia has higher numbers of minority residents and lower-median incomes than both the unincorporated area as a whole and the larger community of Lakeside. Generally, it appears to have disproportionate housing needs and lower access to opportunity.

The US Navy maintains two large housing sites for military dependents in Lakeside. Proximity to El Cajon and Santee likely increases the amount of employment opportunities and transportation options available to Lakeside/Bostonia residents compared to other unincorporated communities. Lakeside was a rural community until the 1950s. With the completion of Interstate 8, convenient access was provided to the employment centers to the west. The quick suburbanization of Lakeside may be a contributing factor towards challenges of access to opportunity. Portions of Bostonia/North El Cajon are identified as Environmental Justice Communities in the Environmental Justice Element, and will be subject to specific place-based programs to increase health, equity, and wellbeing.

Spring Valley

Spring Valley is a community planning area that showed disproportionate needs, high levels of segregation, and low incomes throughout the fair housing analysis. The Spring Valley Community Planning Area borders parts of the City of San Diego that were redlined in the 1930s. While Spring Valley itself was not redlined, the proximity to redlined areas may be a contributing factor towards challenges of integration and segregation and historic access to opportunity. Due to the lack of proper planning before the establishment of zoning and oversight of construction in the 1970s, heavy industrial uses are located adjacent to residential uses. This may be a contributing factor towards challenges to the creation of land use patterns that provide access to opportunities.

Spring Valley is an identified community in the County's Environmental Justice Element. The County is developing place-based programs and improvements to address the needs of Spring

Valley and improve quality of life. These Environmental Justice place-based programs are identified in the "Place-Based Actions to Further Fair Housing" section of this appendix below.

Rancho Santa Fe (San Dieguito)

Rancho Santa Fe is a neighborhood within the San Dieguito planning area that has high income, access to opportunities, and high levels of segregation. Compared to the rest of the County it is disproportionately White. It is one of the most expensive zip codes in the county. The Rancho Santa Fe Homeowners Agreement ('The Covenant') prohibited most minority groups from living in the community until the Fair Housing Act was passed in 1968, contributing directly to its high levels of segregation.

Southern Otay (census tract 100.15)

Census tract 100.15 includes the southern portion of the Otay community area of the unincorporated County of San Diego which is undeveloped and unpopulated. However, because the tract extends along the border and includes populated areas in the cities of San Diego and Imperial Beach to the west, it consistently shows in the fair housing maps as if it is developed and with characteristics that are not actually present in the unincorporated County portion of the census tract.

Backcountry Communities

Rural and backcountry portions of the County include the North Mountain, Desert, Julian, Central Mountain and Mountain Empire community planning areas. Throughout the fair housing analysis, these areas demonstrated higher and increased rates of poverty and housing burden since 2010. Backcountry Communities typically have very limited infrastructure, and higher rates of lower-income households, which may contribute to conditions associated with substandard housing. However, significant portions of the backcountry community are state, federal, or tribal lands over which the County has little to no land use and development authority.

County of San Diego Regional Analysis of Impediments to Fair Housing Choice

In 2020, the County of San Diego collaborated with all jurisdictions in the County to prepare a Regional Analysis of Impediments (AI) to Fair Housing Choice. The impediments found by the AI complements the analysis of fair housing in the unincorporated County, offers regional context of fair housing issues and provides a regional summary of fair housing issues. The AI draft dated August 2020 found the following impediments that apply to all 19 jurisdictions in the San Diego region:

- Hispanics and Blacks continue to be underrepresented in the homebuyer market and experience large disparities in loan approval rates.

- Due to the geographic disparity in terms of rents, concentrations of HCV use have occurred, with a high rate of voucher use in El Cajon and National City.

- Housing choices for special needs groups, especially for seniors and persons with disabilities, are limited. Affordable programs and public housing projects have long waiting lists.

- 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.

- Fair housing outreach and education should expand to many media forms, not be 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 an ineffective means to reach the community at large.

- Patterns of racial and ethnic concentration are present within particular areas of the San Diego region. In San Diego County, just over 15 percent of residents indicated they spoke English "less than very well" and can be considered linguistically isolated.

- Various land use policies, zoning provisions, and development regulations may affect the range of housing choice available. Zoning amendments related to density bonuses, accessory dwelling units, low barrier navigation centers, emergency shelter capacity, parking standards, and transitional and supportive housing are needed in San Diego County.

SITES INVENTORY

AB 686 (Affirmatively Furthering Fair Housing) requires that the Housing Element further address fair housing for under-resourced groups. The County must "take meaningful actions to overcome patterns of segregation. For purposes of the housing element site inventory, this means that sites identified to accommodate the lower-income need are not concentrated in low-resourced areas (lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Instead, sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing."

The unincorporated County is by nature largely rural, agricultural, and open space. It has a limited supply of urbanized areas with services and infrastructure appropriate to support higher-density housing. These areas are primarily limited to the older and larger villages and a number of islands of unincorporated County lands in the urbanized areas of several incorporated cities. Despite these limitations, sites suitable to produce housing for lower-income households are distributed among these village and island areas. The communities of Fallbrook and North County Metro together account for a substantial amount of the very low-income housing capacity. This is largely due to the high potential of the Buena Creek Sprinter Site and potential for additional infill in the Fallbrook Village mixed-use area.

The Buena Creek Sprinter Site has been retained from the Sites Inventory of the Housing Element Updates adopted in 2011 and 2017. The Sprinter is a 22-mile light rail line built between Oceanside and Escondido. It offers regular train service on a rebuilt rail line that roughly parallels Highway 78. Most of the rail line passes through urbanized jurisdictions but one station is located in the unincorporated community of North County Metro. To promote the opportunity for transit-oriented development, the County identified large, undeveloped, or underutilized parcels near the Buena Creek Sprinter Station for intensification as part of the 2011 General Plan update and increased residential densities from the existing 1 unit per acre to ranges of 20 to 30 units per acre. These parcels are not subject to the Williamson Act or within an agricultural preserve. With the introduction of the light rail line and the higher densities of surrounding cities, this area has the potential to support high-density housing. It is free of environmental constraints and is located within the Buena Vista Sanitation District, in close proximity to the City of Vista. The primary existing use is greenhouse agriculture and the structures can be easily removed. The increase in density in the General Plan update will substantially increase the value of the land and provide owners with an incentive to redevelop. Additionally, this location is listed as a Smart Growth Opportunity Area by SANDAG, which has the potential to receive planning funds. Developers with experience in large-scale projects have contacted the County and expressed an interest in working with staff to create a transit-oriented comprehensive plan for the area. The unincorporated County currently lacks the mass transit facilities that are more common in the cities, so the Buena Creek Sprinter Station presents an important opportunity to provide the more urbanized, high-density development that can support more affordable housing products.

All of the lower-income sites are in areas with reasonable access to schools and services, and are not in areas disproportionately exposed to pollution or other health impacts. The sites with the greatest potential were specifically zoned for 30 du/ac as part of the 2017 Housing Element to take advantage of the location with the best access to transit and nearby high-quality services.

Racial and Ethnically Concentrated Areas of Poverty (RECAP)

There are no RECAPs within the unincorporated County; no housing element sites are located within RECAPs.

California Tax Credit Allocation Committee Composite Score Map

To assess the fair distribution of low- and moderate-income units, the County utilized the California Tax Credit Allocation Committee's Composite Score maps. These maps account for socioeconomic and environmental indicators to establish different "opportunity categories" for census tracts across California. The maps are updated annually; 2021 maps were used to assess the equitable distribution of units in the Sites Inventory by income category.

Figure 6-I-31 displays the low and moderate income identified sites in the context of the TCAC Composite Score for each census tract. Identified sites fall into a range of TCAC resource areas. The majority of sites fall into a moderate resource area, with some falling into low resource areas.

The identified sites in the low resource area of Otay are part of a planned community in a currently undeveloped area. As the area is developed, it is anticipated that it will change from a low to a moderate or high resource area.

Figure 6-I-31 illustrates the parts of the County by the California TCAC opportunity category. Many of the tracts considered "High" or "Highest" resource are located in rural or semi-rural areas of the unincorporated County. Despite appearing to represent a significant portion of the unincorporated County's gross area, most of these tracts are large in area and characterized by agriculture, open space, or protected resources. Nearly all of these areas are located in very high fire hazard severity zones, lack infrastructure, and are isolated from jobs and transit. Review of many of these high resource areas excluded them from consideration for the Sites Inventory based on a detailed analysis of local conditions.

As the County is focusing new growth in Village areas, the acreages of the Village areas (not including rights of way) were totaled by opportunity category, as opposed to using the gross acreage by opportunity category. This method provides a more accurate and representative view of the TCAC categories as related to RHNA sites and developable areas. *Table 6-I-11* shows that most County Villages are within moderate resource and low resource areas (85.5 percent) while only 12 percent is within high or highest resource areas. The unincorporated area does not have any census tracts considered "high segregation and poverty" by TCAC.

Figure 6-I-31: RHNA Site Distribution and TCAC Composite Score
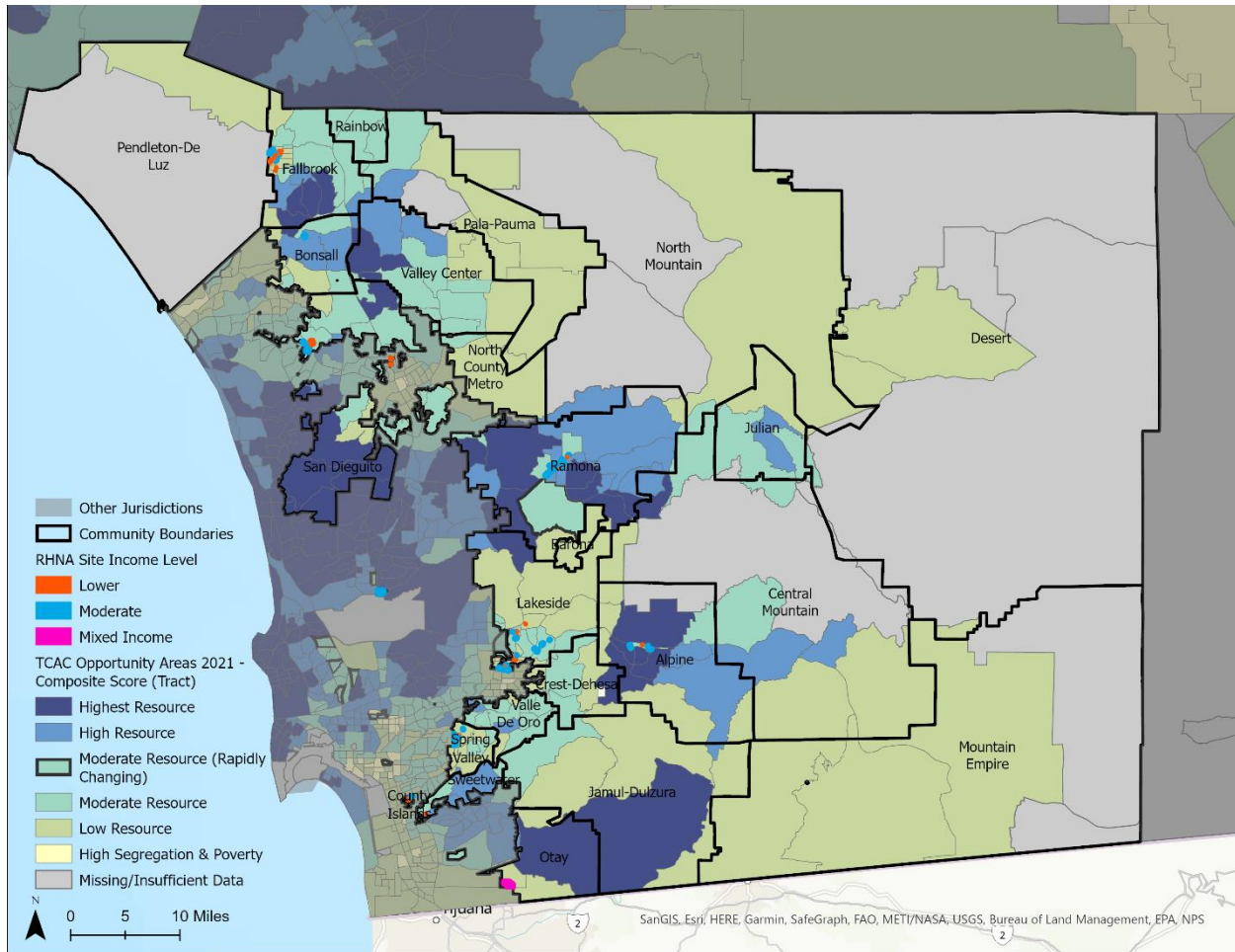
SOURCE: AFFH Data and Resources Mapping Tool. May 2021.

Table 6-I-11: TCAC Opportunity Categories and Identified Sites

Opportunity Category	% of Land in County Villages	% Low Income	% Moderate Income	% of Identified Low- and Moderate-Income Units*
Highest Resource	6.31%	0.00%	28.28%	13.48%
High Resource	5.73%	0.52%	11.94%	5.96%
Moderate Resource	56.97%	61.53%	0.00%	48.67%
Moderate Resource (Rapidly Changing)	2.38%	0.79%	34.56%	0.41%
Low Resource	28.61%	37.16%	25.22%	31.47%

Note: The above total does not include the potential lower-income units in Otay 250, ADUs, or building permit credits. Otay 250 falls within a low resource census tract, but the tract has very few existing residential units, and the TCAC may be skewed by the presence of a state prison. Once the specific plan vision is implemented, the area will be characterized by access to high-paying jobs, amenities, and a high-quality transit corridor. See the Otay Community description below for more information.

The distribution illustrates that the County has located sites in higher opportunity areas where feasible. While 31 percent of lower- and moderate-income units are within low resource areas, this proportion is roughly equivalent to the distribution of these areas within unincorporated villages as a whole. Additionally, areas designated as "highest resource" received a proportionately higher percentage of lower- and moderate-income units. The high and highest resource areas only account for 12 percent of the unincorporated Village areas but are absorbing more than 19 percent of the lower- and moderate-income units.

Table 6-I-11 does illustrate a disparity between the County land area and the location of the lower-and moderate-income sites. In particular, there are no lower-income units in the highest resource and minimal units in the high resource TCAC areas, though there are many moderate units located in these areas. The lower-income sites are disproportionately located in both the moderate and low TCAC tracts relative to the distribution of village land. In response, the County is including specific programs to both implement place-based improvements to lower-resource areas and encourage new multi-family housing in high-resource areas, which are included in the Housing Element Implementation Plan and further described below. Furthermore, the TCAC index does not provide a full representation of an area's opportunity; other factors, such as access to transit, jobs, and amenities, must also be considered. These factors are further discussed in the "Other Factors and Knowledge" section. The County is also conducting a number of place based improvement programs to improve and invest in areas considered to have "low" opportunity (see the Place-Based Improvement section below). Finally, the County's upcoming inclusionary housing ordinance, as well as high levels of ADU production will provide lower and moderate income housing in areas of higher opportunity. While these sites and units are not included in the geographic breakdown above, they will meaningfully contribute to adding new housing for all incomes in areas of higher opportunity.

The TCAC scores of different unincorporated communities are further described below.

DISTRIBUTION OF SITES

Table 6-I-12 below illustrates the sites inventory capacity of each of the County's community planning areas. As illustrated, the communities of Otay (through the Otay 250 Specific Plan), North County Metro, Fallbrook, and County Islands accommodate much of the lower- and moderate-income RHNA capacity. The remaining sites are dispersed throughout the communities of Lakeside, Ramona, Spring Valley, Sweetwater, and Bonsall.

As noted in *Appendix 6-C*, the criteria used for selecting RHNA sites included access to infrastructure and resources, as well as avoidance of environmental constraints. While some of the sites may be within communities designated as "low resource" by TCAC, all of the selected

sites have access to amenities such as grocery stores, schools, and employment. The lower and moderate-income sites are located within the County's Village designated areas which have infrastructure to support higher density housing, the most access to transit and services and community facilities. The proposed inventory does not disproportionately concentrate new development in existing communities of concern.

Table 6-I-12: Distribution of Units by Community

Community	Lower	Moderate	Above Moderate	Grand Total
Alpine	19	69	-	88
Bonsall	-	139	-	139
County Islands	134	576	-	710
Fallbrook	474	305	-	779
Lakeside	182	275	-	457
North County Metro	1,209	194	-	1,403
Otay (Otay 250 Specific Plan)	663	-	1,547	2,210
Ramona	106	441	-	547
Spring Valley	154	87	-	241
Sweetwater	12	-	-	12
Grand Total	**2,953**	**2,086**	**1,547**	**6,586**

Alpine

Alpine is a village located east of El Cajon along Interstate 8. It is characterized by a small downtown/main-street, and has a diversity of housing stock, from single-family homes to higher density apartments and condominiums. Alpine has public transit access through MTS bus routes and is in close proximity to sub-regional employment centers in El Cajon. Alpine has CES 3.0 scores below 20% of the statewide average, with tracts considered highest resource and moderate resource by TCAC.

Bonsall

Bonsall is a small village located between Vista and Fallbrook along SR-76. It is characterized mainly by semi-rural residential and agricultural uses, but also has concentrations of commercial development and high density housing. Bonsall has public transit access through a NCTD bus, and has regional access to job centers in Vista, Carlsbad, and Escondido. Bonsall has CES 3.0

scores between 15% and 30% of the statewide average, with tracts considered high and moderate resource by TCAC.

County Islands

County Islands are regions of unincorporated area surrounded by incorporated jurisdictions. The sites inventory includes sites within the Lincoln Acres island and the Miramar Island. Lincoln Acres is located between National City and Chula Vista, and largely consists of single-family residential uses. It has access to MTS trolley stations and bus lines, as well as commercial and employment in the nearby cities. Lincoln Acres has CES 3.0 scores between 55% and 60% of the statewide average, and the tract is considered as low resource by TCAC.

The Miramar Island is surrounded by the City of San Diego and is located east of I-15. The Miramar Island has excellent transit access and is located approximately one mile from a new transit center at Miramar Community College. The site is located in close proximity to Marine Corps Air Station Miramar, the Miramar Industrial Area, and the Sorrento Valley High-Tech cluster, as well as neighborhood serving commercial. The tract has a CES 3.0 score between 5% and 10% of the statewide average and is considered highest resource by TCAC.

Fallbrook

Fallbrook is a village located in the northernmost part of the County, near the border with Riverside County. Fallbrook has a wide variety of existing uses, including single-family residential, multi-family residential, commercial, industrial and agriculture. It has public transit access via an NCTD bus line. Fallbrook has significant employment through its agricultural, commercial, and industrial sectors, but also has access to other regional employment centers, notably Marine Corps Base Camp Pendleton and distribution centers in southern Riverside County. The community is identified as a location with disproportionate needs, and the locating of sites in Fallbrook could potentially have the effect of exacerbating concentrations of fair housing issues. However, the County does not expect that the identification of sites in Fallbrook will exacerbate fair housing issues, as new housing will create opportunities to stabilize rents and locate residents in areas with access to services, transit, and employment. Furthermore, the County is conducting an update to the Fallbrook Community Plan, which will identify specific place-based improvements, spur community investment, and enhance the quality of life for residents. The update to the Fallbrook Community Plan is anticipated to be completed by the end of 2022. Fallbrook's core (where inventory sites are located) has CES 3.0 scores between 40% and 60% of the statewide average. All tracts are considered low resource by TCAC.

Lakeside

Lakeside is a community located southeast of Santee and northeast of El Cajon. The community planning area also includes the neighborhoods of Bostonia and Winter Gardens. Existing uses mainly consist of single family homes, but also has a mix of multi-family, commercial, and industrial uses. Multiple bus-lines serve these communities. It is with close proximity to regional employment areas in El Cajon and to San Diego State University. CES 3.0 scores range widely, with scores between 15% and 70% of the statewide average in the residential areas. The area is considered low and moderate resource by TCAC.

North County Metro

The North County Metro area is located near the Cities of Escondido, Vista, and San Marcos. Most of the sites within the sites inventory are located near the Buena Creek Sprinter Station, the only light rail stop in the unincorporated area. This part of the North County Metro has some of the best public transit access in the unincorporated County, and also is in close proximity to commercial and professional services located in the nearby cities. North County Metro also has access to regional employment centers in Vista, Escondido, and Carlsbad. Generally, CES 3.0 scores range from 20% to 35% of the statewide average, and TCAC considers the census tracts moderate resource.

Otay

Otay is an area located east of the City of San Diego along the US-Mexico border. All of the sites included in the Otay Community Area are within Otay 250, part of the East Otay Mesa Business Park Specific Plan. Otay 250 is within a SANDAG Smart Growth Area and is expected to be served by high-quality Bus Rapid Transit when the Otay Mesa East Port of Entry opens. While the land is currently vacant and lacks amenities, the Specific Plan calls for a mix of residential, employment, and commercial uses to serve the new community. The Specific Plan contains a number of policies dedicated to ensuring a high quality of life for residents, incentivizing residential development, and improving job opportunities along the border by creating high quality jobs in a complete community. Additionally, the Otay 250 amendment was initiated by a residential developer, and it already has an approved infrastructure plan, tentative map, and EIR, giving certainty that the project can be constructed over the 6th Cycle. The CES 3.0 score is between 55% and 60% of the statewide average, and the tracts are considered low resource by TCAC. These TCAC scores are not representative of the community, as the only population in the area is located in the Donovan State Correctional Facility. The presence of the prison and lack of existing development likely skews the TCAC, and makes a more site-specific evaluation more appropriate and accurate. Since the site is part of a specific planning area, has developer

interest, and will be adjacent to a high quality transit corridor, it is likely to be transformed from a "low" opportunity area to a high opportunity area when it is built. In addition, the County will work with the project applicant to ensure that sufficient community amenities (such as parks, neighborhood commercial, etc.) are included in the final project. The Otay 250 site is also discussed in *Appendix 6-C*.

Ramona

Ramona is a large village located northeast of the City of Poway. It has a diversity of existing uses, including single-family residential, multi-family residential, commercial, and agriculture. It is served by public transit and is close to employment centers in Poway and the City of San Diego. Ramona has CES 3.0 scores ranging from 5% to 30% of the statewide average and is considered high and moderate resource by TCAC.

Spring Valley

Spring Valley is located south of SR-94 and East of the cities of San Diego and Lemon Grove. Most uses are single-family residential, multi-family residential, and industrial, with many neighborhood serving shopping centers. Spring Valley has transit access through numerous MTS bus lines. CES 3.0 scores vary widely, from 25% to 60% of the statewide average, with most of the community being considered low resource by TCAC.

Sweetwater

The community of Sweetwater is located south of the City of San Diego and northeast of Chula Vista. It is centered along the Sweetwater River, and generally consists of single-family residential uses, open-space, and limited neighborhood commercial and multi-family. The area has transit access through an MTS bus-line that connects to the MTS trolley station in Chula Vista and Southwestern Community College. CES 3.0 scores range from 30% to 50%, and the census tracts are considered moderate to high resource.

EFFECT OF SITES INVENTORY ON COMPONENTS OF FAIR HOUSING

The sites inventory distributes low and moderate-income sites throughout urbanized villages in the County, and will expand opportunities for high quality, accessible housing across the unincorporated areas. The potential impacts of the sites inventory on all components of fair housing are discussed below.

Integration and Segregation and R/ECAPs

As discussed above, the County's lower and moderate income sites are distributed among its urbanized villages in the western county. The County does not have any R/ECAPs, so the sites inventory will not create any concentration of lower-income units in R/ECAPs. Additionally, the County does not have any tracts classified as "High Segregation and Poverty" by TCAC, so the sites inventory will not further contribute to concentrated segregation in these areas.

Although the County does not have existing clusters of isolation/segregation, the sites inventory has the potential to inadvertently create additional segregation. The unincorporated County is highly diverse, both within and among the different community planning areas. The lower and moderate income sites are distributed throughout the County's urbanized villages, and while some communities have a higher number of low to moderate income sites, the villages with higher number of sites generally represent areas of higher opportunity, with greater access to jobs, infrastructure, and transit.

Effect of Sites on Income Segregation

The County used HCD's recommended methodology to analyze income segregation both regionally and within the unincorporated areas.[62] It should be noted that the census information used to analyze demographic segregation is difficult to isolate for unincorporated areas only; the information contained herein includes information for census block groups that cross jurisdictional boundaries with nearby cities, which has the potential to skew the data. Based on HUD Lower and Moderate Income (LMI) Population data, the regional average (countywide) percent of LMI populations by block group is 47.95 percent. The unincorporated County has an average LMI of 43.71 percent, slightly lower than the regional average. Within County Villages, the County has an average LMI population per block group of 46 percent, which is closer to the regional average, and indicates that LMI populations are slightly more concentrated in villages than the unincorporated region as a whole.

The average LMI population for the lower and moderate income inventory sites inventory is 66 percent, higher than the Village average as a whole. This indicates that the lower and moderate income sites are disproportionately located in lower-income areas of the unincorporated area, and have the potential to inadvertently contribute to additional income segregation. *Table 6-I-13* illustrates that the inventory sites are typically located in block groups with larger low and moderate income populations. Despite the appearance of over-concentrating these sites in lower-income areas, there are a number of other factors and additional considerations that

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[62] HCD Affirmatively Furthering Fair Housing Guidance, page 47.

make these site selections appropriate. Additionally, the communities selected for these sites have planned place-based improvements that will improve health, well-being, and access to opportunity. These local factors and planned programs are further discussed and substantiated below.

**Table 6-I-13: Distribution of Sites by LMI Population**

LMI Population (Block Groups)	Lower Income Units	Moderate Income Units	Grand Total
LMI Below Village Average	0.94%	17.34%	18.28%
LMI Between 100% and 125% of Village Average	25.96%	2.97%	28.93%
LMI between 125% and 150% of Village Average	9.80%	13.60%	23.40%
LMI Between 150% and 200% of Village Average	15.63%	13.48%	29.11%
LMI More than Twice Village Average	0.00%	0.27%	0.27%
Grand Total	52.33%	47.67%	100.00%

Figure 6-I-32 displays low and moderate income sites against census block groups with greater than 50 percent of the population falling into low and moderate income categories. The map illustrates that many of the County village areas and backcountry communities have high percentages of low and moderate income families. Low and moderate sites were concentrated in village areas, indicating that the sites inventory has the potential to inadvertently increase income segregation in the unincorporated areas.

Figure 6-I-32: RHNA Site Distribution and Low to Moderate Income Block Groups
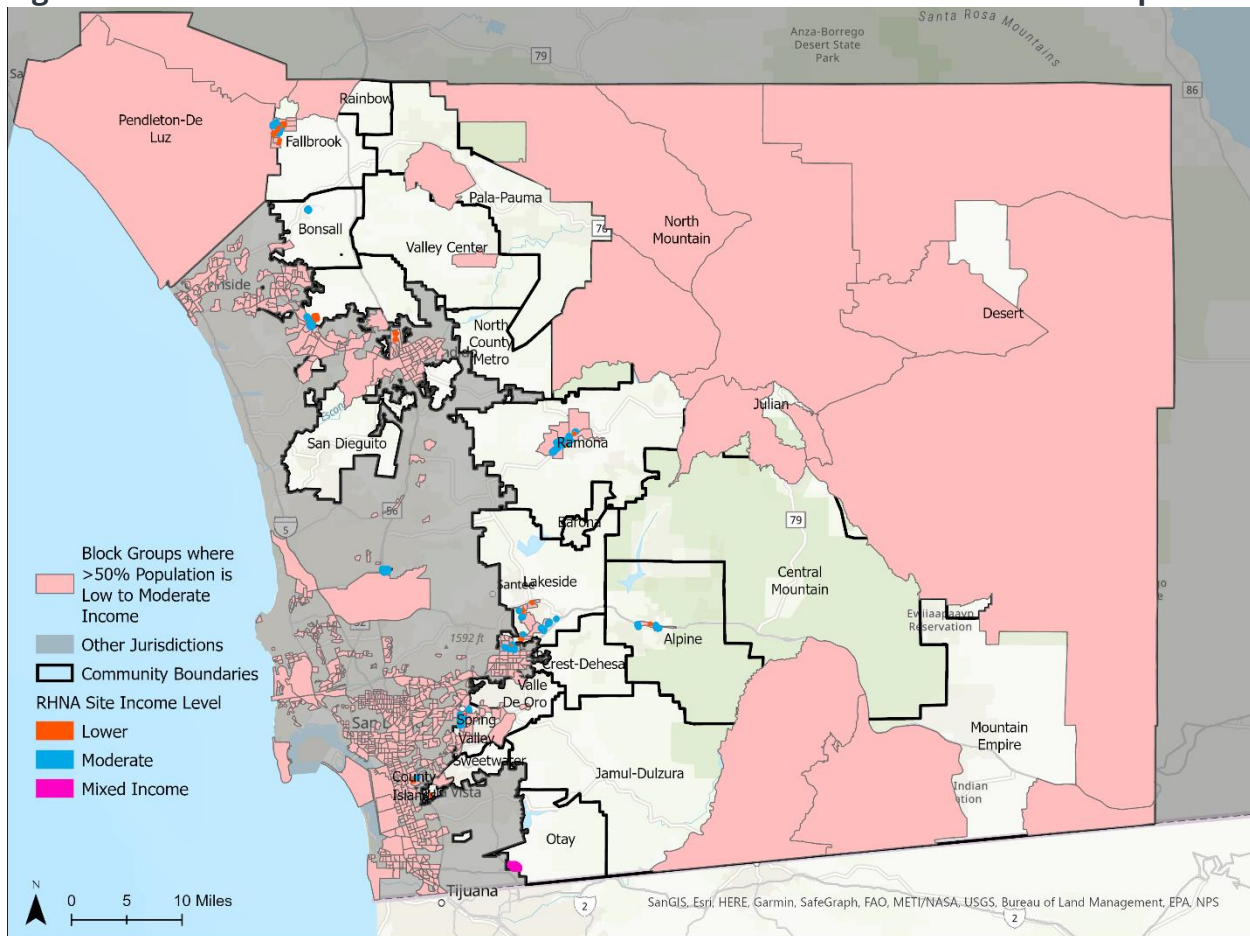
SOURCE: San Diego Regional Analysis of Impediments to Fair Housing Choice, 2020.

Figure 6-I-33 shows low and moderate income sites in the context of poverty population density. Poverty population density is higher in the eastern and more rural portions of the County. Most of the identified low and moderate income sites do not fall into areas with existing high poverty population density. However, there are some lower and moderate-income sites in areas of higher poverty population in the communities of Spring Valley and Lakeside.

Figure 6-I-33: RHNA Site Distribution and Poverty Population Density
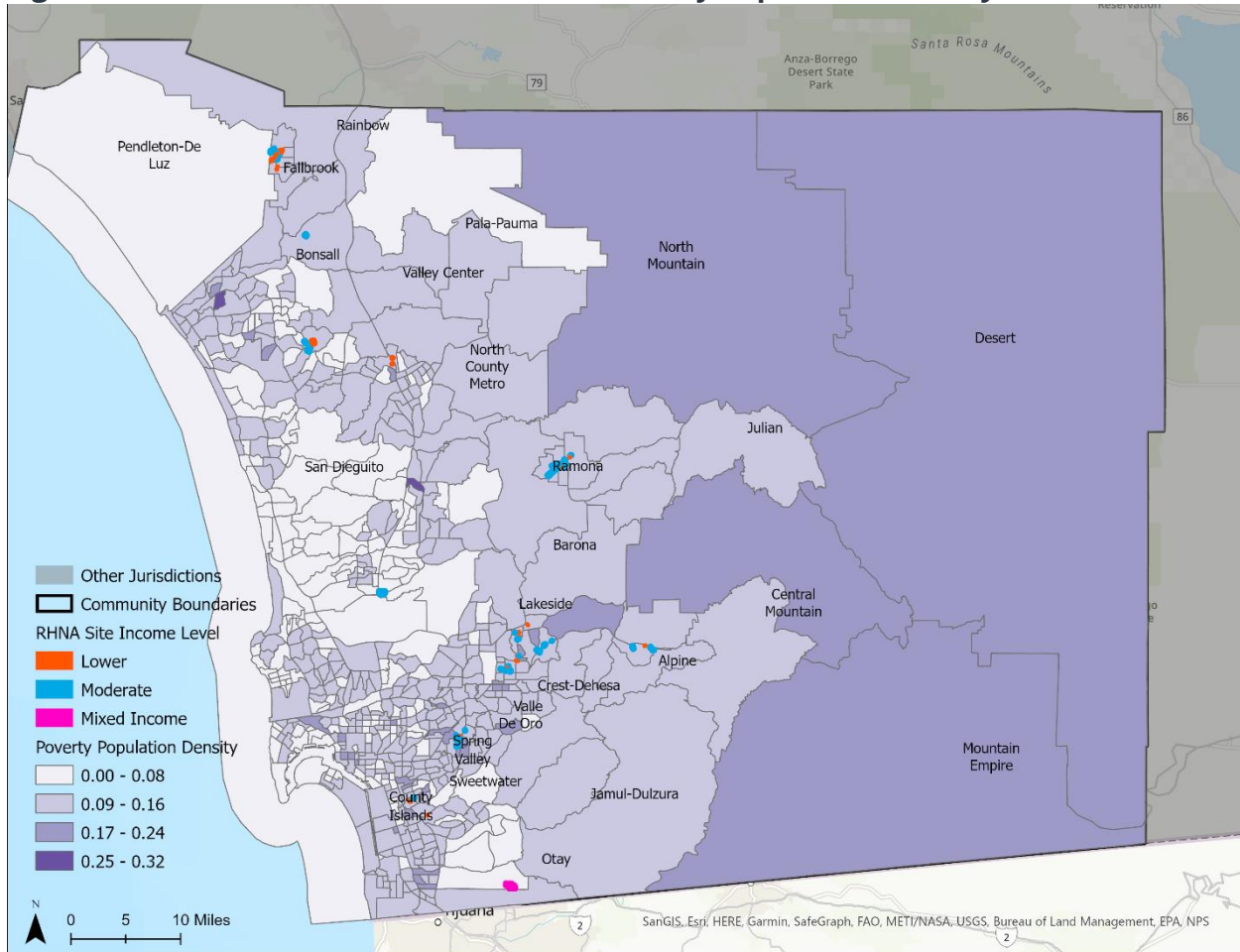
SOURCE: San Diego Regional Analysis of Impediments to Fair Housing Choice, 2020.

Effect on Racial and Ethnic Segregation

Figure 6-I-34 displays low and moderate income sites against areas that are designated as minority concentration areas. A minority concentration area is an area where greater than 50 percent of the population is of a racial or ethnic minority. Many County communities are characterized as minority concentrated. These areas are spread throughout the unincorporated area, with both high density villages and rural communities being classified as minority concentrated areas. While locating sites in these neighborhoods has the potential to increase or

exacerbate racial segregation, it is not possible to quantify or determine the exact effects of locating sites in these areas. Because the low and moderate income sites are spread throughout the western County, they are not over-concentrated in any particular community and are not anticipated to exacerbate racial segregation.

Figure 6-I-34: RHNA Site Distribution and Minority Concentrated Areas
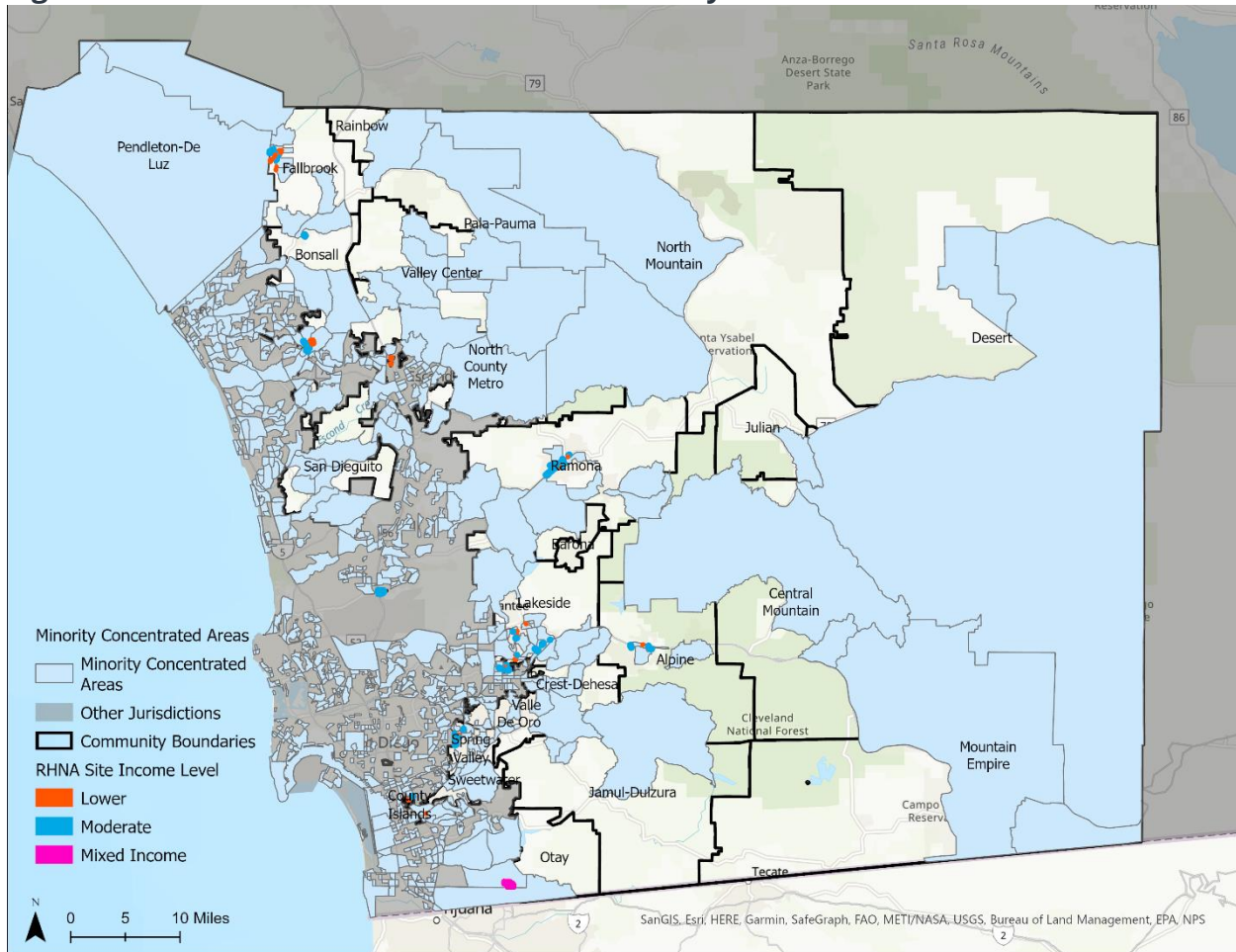
SOURCE: San Diego Regional Analysis of Impediments to Fair Housing Choice, 2020.

The County calculated dissimilarity indices for non-Hispanic/Hispanic segregation. The dissimilarity index compares the population of Hispanic/Latino of any race to non-Hispanic or Latino of any race throughout the unincorporated area. The absolute value of the dissimilarity index is displayed by block group in choropleth format on *Figure 6-I-35*. High values on the map indicate that the block group is either disproportionately Hispanic or disproportionately non-Hispanic compared to the unincorporated area average. As a whole, the unincorporated area has a dissimilarity index for non-Hispanic/Hispanic segregation of 0.315, which indicates that Hispanics and non-Hispanics have low segregation in the unincorporated areas. The map shows

that most low and moderate income sites are located in areas with low levels of Hispanic segregation.

Figure 6-I-35: RHNA Site Distribution and Hispanic Dissimilarity Indices
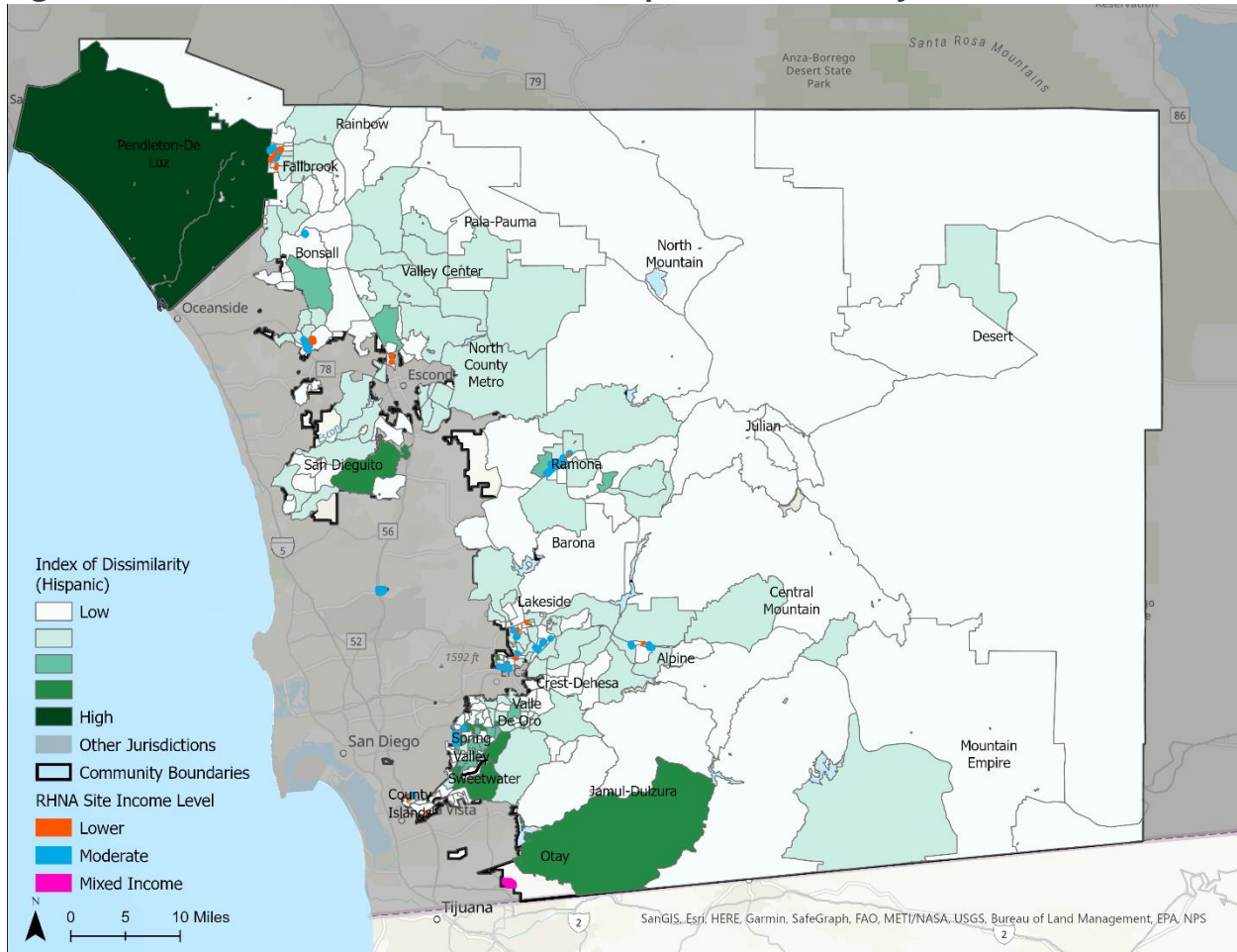
SOURCE: US Census, ACS 2017.

While it is not possible to anticipate the exact effect of the sites inventory on racial segregation, it is unlikely to exacerbate any existing conditions of segregation. The sites are distributed throughout its western villages, which tend to have higher low-income and minority populations. Despite this, the sites are not disproportionately located in any particular location and represent an appropriate balance between County communities.

Access to Opportunity

Access to opportunity was evaluated using the TCAC, as discussed above. While the County does include some lower and moderate income units in areas that may be considered "low resource," sites are not disproportionately concentrated in these locations. *Table 6-I-11* illustrates that lower and moderate income sites are disproportionately located in high resource census tracts,

improving, further improving access to opportunity. Additionally, sites were selected based on proximity to other resources, including transit and community serving retail. The sites included in the inventory are not isolated from opportunity: they are located in areas with the most access to services and amenities in the unincorporated areas. Locating additional sites in these communities will enhance access to opportunity by concentrating new housing close to jobs and transit. The County is implementing a number of place-based improvement programs to enhance health, equity, and sustainability, which will further create areas of opportunity (discussed below). With the new programs and planning efforts contributing to the revitalization of these areas, the locations for lower and moderate-income sites constitute the locations with the highest levels of opportunity in the unincorporated County.

Based on the above factors and analysis, the distribution of sites in the inventory will further improve access to opportunities, while focusing development in a sustainable and equitable pattern.

Disproportionate Housing Needs and Displacement Risk

The sites inventory includes low and moderate sites in communities that may have disproportionate housing needs or have higher risks of displacement. For example, some census tracts in the communities of Spring Valley, Fallbrook, and Lakeside have a high proportion of cost-burdened households, rent overpayment, or overcrowding. Identifying additional housing units in these communities is appropriate, as it will expand the housing stock and options for households who may be experiencing challenges.

With additional housing in communities with disproportionate needs and risks, residents will have additional choices for housing. New lower-income, moderate, or market-rate housing may help stabilize rent and home prices and prevent further increasing costs that contribute to over-crowding, rent burdens, and displacement. The new housing will provide additional housing options, including different unit sizes and types that can support a variety of income levels and household types. New units in these communities will contribute positively to solutions addressing disproportionate needs and mitigating displacement risk. Furthermore, the upcoming inclusionary housing ordinance will guarantee that new housing provides opportunities for low- and moderate-income households to remain in their communities.

Some of the County's rural communities also have disproportionate housing needs. While these communities do not appear to have high rates of over-crowding or displacement, they do face high levels of cost-burdens when compared to some other urbanized areas of the County. There are no sites identified in these areas due to a general lack of public infrastructure and transit options that support higher density land uses. While not identified for new low or moderate

income sites, these communities do have existing zoning that could support new housing, potentially alleviating common cost burdens.

Other Factors and Knowledge

The sites inventory was developed to preserve environmental resources, focus new housing in areas of high opportunity and amenities, concentrate development in VMT efficient areas, and include sites that are exhibiting characteristics indicating that near-term development is likely. These other factors used to select sites are complementary and supportive of AFFH. The other criteria used for site selection resulted in the location of low and moderate inventory sites in County villages, which have the most access to jobs, transit, schools, and services. Specific neighborhoods may have higher minority concentrations or low income households than the County as a whole, but these attributes do not mean that these neighborhoods should not receive the benefits and investment of new housing. Instead, locating housing in the County villages achieves multiple goals: preserve natural resources, add housing stock in smart growth areas, and enhance existing neighborhoods with new housing choices. Combined with the programs and place-based actions discussed below, the sites inventory will affirmatively further fair housing in San Diego County.

COUNTY ACTIONS TO AFFIRMATIVELY FURTHER FAIR HOUSING

COUNTY STAFF AND DEPARTMENTAL PROGRAMS

The Board of Supervisors has recently voted to create and implement a number of departments and programs that will affirmatively further fair housing and equity across the region. While these are not included in the Housing Element's implementation programs, these actions will positively contribute to fair housing, healthy communities, and social equity.

▪ On January 12, 2021, the Board of Supervisors voted to declare racism a public health crisis. The Board directed staff to create a process to solicit community input to identify County policies and practices that lead to or perpetuate racial or ethnic disparity, with the goal of catalyzing change for just, safe, and healthier communities. Additionally, the County will revise its statement of values, mission, vision and strategic plan to represent equity and inclusion. Staff will enhance data collection capabilities to identify facial disparities among programs and services that are meant to improve health, social, economic, educational and criminal justice circumstances, and prioritize funding proportional to need when possible.

- On April 6, 2021, the Board of Supervisors directed staff to establish a new Department of Homeless Solutions and Equitable Communities. The Board found that a separate department is necessary to achieve sustained focus on this complex and interconnected issue. The creation of this new department will achieve better coordination of existing and future County homeless activities and programs and serve as a central point of contact and collaboration for outside partners in order to help vulnerable San Diegans and reduce homelessness in the region.

- On April 6, 2021, the Board of Supervisors directed staff to develop a Pilot Program to Address Homelessness in North County (Not only unincorporated County). The North County pilot program will deploy an integrated team that will work in partnership with the staff in various cities to increase the level of outreach, assessments, and connections to wrap-around services and suitable housing opportunities for those experiencing homelessness. The team will be comprised of at least 10 outreach staff (primarily highly qualified social workers, such as LCSWs, though the need for housing navigators should also be assessed). Appropriate administrative, data analytics, and supervisorial staff will support the outreach team.

- On April 6, 2021, the Board of Supervisors discussed Expanding the Innovative Trust Fund. The Board referred to Budget for consideration of the establishment of an additional $25 million appropriation in order to expand funding for the Innovative Housing Trust Fund; and directed the Chief Administrative Officer to work with community stakeholders, including affordable housing developers, to determine how the Innovative Housing Trust Fund program can be designed to leverage state and federal resources to increase affordable housing in San Diego County, and report back to the Board via memo on changes to existing rules and preferences to the program; and directed the Chief Administrative Officer to assess options for preferences in areas with low vehicle miles traveled zones for consideration in this program.

- On April 6, 2021, the County has created a framework to establish budget equity principles to guide the development of the County's annual budget. The County will build a budget equity assessment tool to incorporate equity into the budget development process and day-to-day operations. Specifically, the tool will reevaluate the existing performance measures and strategic goals for every County department, and ensure all budget proposals consider department specific data. The guiding principle will be whether and how budget requests either advance equitable outcomes or exacerbate inequality. The new framework will also increase opportunities for community engagements to be a part of the budget process.

- On May 19, 2021, the Board of Supervisors directed staff to establish a new Office of Environmental and Climate Justice. The Board directed staff to establish an Office of Environmental and Climate Justice within the Land Use and Environment Group (LUEG) to ensure that County efforts are advanced to meaningfully address equity, environmental and climate justice and communities disproportionately impacted by environmental burdens and related health problems, and to ensure that our collective efforts in reducing greenhouse gas emissions, addressing food justice, transportation equity, and the protection of civil rights in emergency planning and response are also present.

  o LUEG must identify funding and staff resources to include in the upcoming budget and report back to the Board within 120 days on the structure, scope, roles and responsibility of the newly established office including, but not limited to, priorities and budget-making process, collaborate with County departments across the County enterprise, the San Diego Air Pollution Control District, and multi-jurisdictional partnerships in order to set priorities, goals, and metrics for the goals in the Environmental Justice Element to ensure reduction of air pollution emissions, reductions in exposures of toxics and hazardous waste to sensitive populations, equity in climate related responses, and improved health outcomes.

- On May 5, 2021, Board voted to consider restructuring County departments to prioritize sustainability, natural resource management, and equity. The County will Issue a competitive solicitation for services to assess the capacity of the current organizational and staffing structure of departments across the County enterprise to achieve the County's sustainability goals, consult with relevant stakeholders, and to propose organization changes that maximize sustainability and equity, and promote comprehensive natural resource management.

PLACE BASED ACTIONS TO FURTHER FAIR HOUSING

Community Planning Efforts

The County is currently planning to amend and revise the Fallbrook Village Community Plan, which will provide an opportunity for the County to conduct a detailed assessment on Fallbrook's existing conditions and develop place-based community improvement strategies to provide additional housing opportunities, stabilize the Village Core commercial district, and address infrastructure access and concerns. This plan seeks to improve and enhance the village, defined as area with existing village zoning regulations (FB-V#). The plan consists of updates to the zoning and design guidelines and a streetscape plan for Main Street. The plan is expected to begin in

2021 and be adopted by the end of 2022. The update includes a market analysis, parking analysis, zoning update, streetscape vision, and revised design guidelines.

The County is conducting and considering updates to other community plans. The County is currently updating the Alpine Community Plan and the Twin-Oaks sub-area plan. The Board has also directed PDS to complete 15 Community Plan Updates by 2030. These community plans will update zoning and land-use designations, provide comprehensive infrastructure evaluation and assessment, and identify necessary investments in public spaces, health and wellbeing, and infrastructure. The County will prioritize communities that were identified as communities of concern or with disproportionate needs in the AFFH analysis or Environmental Justice Element for community plan updates. Particularly, PDS will conduct updates to the Lakeside and Spring Valley Plans and develop meaningful place-based improvement strategies to further fair housing and equity in these communities.

Additionally, the County is considering adopting a specific plan in the Valle de Oro Community. These current and anticipated efforts further illustrate the County's commitment to comprehensive planning efforts that develop place-based revitalization strategies across the unincorporated areas. As an ongoing action, PDS evaluates the needs and opportunities for other community planning efforts; it is anticipated that additional community plan updates will occur during the 6th Cycle.

Finally, the County is including a number of programs as a part of the Housing Element to further improve access to opportunity. In particular, Programs 3.6.5.A and 3.6.5.B will facilitate new residential development in high opportunity neighborhoods. Program 3.1.1.D will ensure that higher opportunity village neighborhoods have zoning that supports small scale multi-family typologies to support housing for a variety of households. Program 3.6.6.B commits the County to improve community conditions and build assets in areas exhibiting conditions of lower opportunity, and 3.6.6.C will create a plan to address negative health impacts associated with past land-use decisions and incompatible uses. Finally, 3.1.1.E will develop an inclusionary housing ordinance, providing new opportunities for lower and moderate income households across the County. These policies are not all inclusive, and the Implementation Plan contains a full suite of actions that will further fair housing during the 6th cycle.

Community Development Block Grant Funding (CDBG)

In its FY 2020-2021 consolidated plan, the County has identified a number of infrastructure improvements and place-based actions that could be implemented using CDBG funds. The plan identifies funding for park improvements in Spring Valley, sidewalk/streetscape improvements in Lakeside, Ramona, and Fallbrook, as well as accessibility improvements to community centers

in Fallbrook and Ramona. The consolidated plan illustrates the County's commitment to improving infrastructure and assets, particularly in communities of concern. The County will continue to pursue funding for place-based improvements in across the unincorporated areas to address infrastructure needs.

Live Well San Diego

The County of San Diego Board of Supervisors adopted the *Live Well San Diego* vision in 2010 with a mission to efficiently provide public services that build strong and sustainable communities. It includes three focus areas: Building Better Health, Living Safely, and Thriving. These focus areas have been incorporated into the County of San Diego Strategic Plan. Current topics *Live Well San Diego* addresses include health equity, healthy food systems, worksite wellness, aging, and healthy schools, with active transportation and smoke-free living to be added soon.

Live Well San Diego utilizes the collective impact model. This approach brings together cross-sector organizations over a common agenda. There are over 500 Recognized Partners of *Live Well San Diego*. Recognized Partners are from various sectors and include health care providers, community and faith-based organizations, businesses, school districts, and other jurisdictions, including cities, tribal governments and military or veterans organizations. Additionally, *Live Well San Diego* encourages individual participation and provides tools and resources for individuals and families to improve their quality of life. *Live Well San Diego* provides an events calendar for health, safety, and wellness events that are taking place across the San Diego region.

To better provide for change at the local level, the County is broken down into five geographic regions: North County Regions, North Central, East, Central, and South. Each region is led by a community leadership team, has its own Community Enrichment Plan, and has its own programs and events.

Live Well San Diego uses ten indicators to capture the overall well-being of residents in San Diego County. The indicators are used to measure the impact of efforts by Recognized Partners of the program and community stakeholders long-term. *Live Well San Diego* provides an annual progress report on these ten indicators to track progress.

Environmental Justice Element

The County is adopting an Environmental Justice Element concurrently with the 6th Cycle Housing Element. The Draft Environmental Justice Element includes the communities of North El Cajon/Bostonia, Spring Valley, and Sweetwater, though the Board of Supervisors has already voted to consider expanding the element to other communities in the near future.

The Environmental Justice Element contains strong goals and policies to promote health, well-being, and inclusion. The following goals are copied in their entirety exactly as they are presented in the draft Environmental Justice Element. Each goal is associated with specific policies, which can be found in the draft Environmental Justice Element available on the County website. The Housing Element is consistent with the Environmental Justice element.

Draft Environmental Justice (EJ) Element Goals

EJ Community Programs and Services. Support and expand programs and services in the Implementation Plan to prioritize those that identify EJ Communities, address EJ issues, and foster partnerships with countywide partnerships and programs.

Protect Sensitive Land Use Compatibility. Support and expand land use development, transportation patterns, pollution mitigation, and other techniques to ensure compatibility that protects sensitive land uses (schools, housing, health facilities, childcare facilities, senior centers, parks, etc.) from increased pollution exposure in EJ Communities.

Equitable and Healthy Air Quality. Improve air quality conditions for communities so that all residents can live, work, and play in their community without disproportionate risk of air pollution and related negative health impacts.

Protect and Restore Surface Water. Protect and restore surface water bodies in the unincorporated area, including those within EJ Communities, from future contamination.

Distribution and Quality of Public Facilities, Infrastructure, and Services. Ensure public facilities are equitably located and services are distributed throughout EJ Communities at an operational level comparable to the rest of the unincorporated County.

Safe Living Conditions. Ensure all residents have healthy and safe living conditions and both renters and owners can access and receive assistance for weatherization (e.g., heating, cooling, and air filtration, plus safeguards against extreme weather events such as flash floods), upkeep, and maintenance, particularly for households in EJ Communities.

Affordability Measures. Ensure all residents have access to affordable housing options to reduce the prevalence of cost-burdened households, particularly for owners and renters in EJ Communities.

Countywide Food System Improvements. Improve the food system throughout the county, from supply and production to processing, distribution, access, and waste management through comprehensive and holistic approaches to advance an equitable and healthy food system for all residents.

Access to Healthy, Nutritional, and Affordable Food. Expand access to fresh, healthy, and affordable food from grocery stores, convenience stores, farmers' markets, and community gardens to reduce food insecurity in EJ Communities.

Increase Health and Nutrition. Enhance access to health and nutrition resources to reduce rates of diabetes, obesity, and diet-related illnesses.

Physical Health and Wellness. Increase physical activity resources and programs to reduce rates of obesity, heart disease, diabetes, and other health-related illnesses for residents of all ages, cultural backgrounds, and abilities, particularly in EJ Communities.

Healthy Design and Multi-Modal Development. Promote multi-modal land use design and development patterns that decrease vehicle miles traveled, and encourage increased physical activity, biking, and walking as a means to reduce health-related issues.

Parks and Recreation Access. Expand access to parks, recreation facilities, and other safe places for community members to be active by leveraging resources through jurisdictional partnerships, joint use agreements, additional funding, and community volunteers.

Accessible and Culturally Appropriate Civic Engagement. Provide equitable and inclusive opportunities for all County residents, regardless of racial/ethnic background, national origin, age, education, income, or disability to meaningfully engage in the decision-making process, specifically focused on promoting positive health outcomes and wellbeing of residents within EJ Communities, including education and workforce opportunities.

Capacity Building and Leadership Development. Support equitable and inclusive opportunities to build capacity and leadership skills for residents and organizations in EJ Communities through continued civic engagement.

Transparent Governance. Maintain transparent, fair, consistent, and sustained civic engagement to continue identifying and addressing needs and priorities by building trust, establishing relationships, and ensuring community outreach standards.

Implementation Progress Monitoring. Facilitate effective implementation and monitoring of environmental justice programs in the unincorporated County.

Regional Data Clearinghouse. Coordinate alignment among data reporting and monitoring at the regional and census tract level to match statewide data reporting for countywide policies, regulations, and progress reports.

Example Environmental Justice Implementation Programs

The Environmental Justice Element also contains programs that are aimed at furthering fair housing. Though these are not included in the Housing Element, they are still implementation actions taken by the County to further fair housing in environmental justice communities. Examples of such programs include the following:

7.4.1.A   Improve Housing Conditions. Track substandard housing conditions through uniform housing code program implementation in the unincorporated areas and take appropriate enforcement action.

- Research resources and grant funding to remove harmful building materials (e.g., lead paint and asbestos) in older homes.

- Provide resources to promote smoke-free housing and reduce the impacts of second-hand smoking.

7.4.1.D   Code Compliance Outreach and Education. Develop outreach plan and educational materials about code compliance and regulations, focused in EJ Communities.

- Written outreach efforts should be translated into Spanish, or other appropriate language.

- Inform tenants, landlords, and property owners of these efforts through multiple platforms (social media, community workshops [virtual and non-virtual], County website, flyers, outreach events, etc.).

- Focus outreach efforts and continue implementation of the Childhood Lead Poisoning Prevention Program in EJ Communities.

7.4.1.G   Overcrowding Impacts. Collaborate and when feasible partner with community organizations and service providers to assist with outreach and relationship building to distribute resources for large households that may contain multiple and intergenerational families. Explore feasibility of options to provide supportive services for large households to mitigate impacts of overcrowding.

7.4.1.I   Acquisition and Rehabilitation Resources. Assist non-profit and affordable housing providers in the acquisition and rehabilitation of older residential and improve and maintain them as long-term affordable housing.

7.4.2.A   Housing Needs Resource Clearinghouse. Establish a Countywide clearinghouse for resources related to affordable housing, rental assistance, tenant rights, homeownership, homelessness services and other special needs.

- Connect with existing Housing Resources Directory, Homebuyer Education Courses, and Public Education Programs.

- Partner with community-based and advocacy organizations to distribute resources and services in multiple languages.

- Prioritize services for low-income, seniors, persons with disabilities, the unhoused, and other vulnerable populations.

- Provide technical assistance for rental assistance vouchers, homebuyer loan applications, and other resources.

7.4.2.B   Affordable Housing Project Pipeline. Expand partnerships with developers and regional partners to pursue local, state, federal funding opportunities to create a robust pipeline of affordable housing projects aligned with regional goals.

7.4.2.E   Anti-Displacement Strategies. Collaborate with County agencies, service providers, and community organizations to explore anti-displacement strategies focused in EJ Communities

- Inclusionary zoning and rezoning regulations.

- Value capture strategies.

- Community-led programs to prevent displacement (e.g., tenants' rights education).

- Foreclosure assistance resources.

- Rent control policies.

- Protections for low-income renters.

IDENTIFICATION AND PRIORITIZATION OF CONTRIBUTING FACTORS

Table 6-I-14 displays six contributing factors from the AFFH analysis, their fair housing issue area, priority level and reference programs to address them as listed in the Implementation Plan (*Table 6-4-1*). For the priority level classification, factors that most limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance were identified as higher priorities.

Table 6-I-14: Identification and Prioritization of Contributing Factors

Identified Fair Housing Issue	Contributing Factor	Program to Address	Priority (high, medium, low)
Disparities in Access to Opportunities	*Rural Infrastructure Access/Geographic Location:* Rural communities have more limited access to jobs, public transportation, and infrastructure due to being located far from urban centers.	▪ 3.1.2.A: Transit Nodes ▪ 3.6.6.B: Conserved and Improved Assets in Areas of Lower Opportunity ▪ 3.6.6.A: Office of Environmental and Climate Justice ▪ 3.6.6.C: Negative Environmental, Neighborhood, Housing, and Health Impacts ▪ 3.6.6.D: Community Benefit Zoning, Enhanced Density Bonus, or Land Value Recapture Strategy.	**High** These programs focus on improving infrastructure and amenities in low-resource areas. Lack of infrastructure is a high factor contributing to low access to opportunity (e.g., area is less likely to attract development and investment).
Disproportionate Housing Needs	*Lack of Affordable Units in a Range of Sizes:* The unincorporated area does not have sufficient units at either restricted or naturally affordable rents for a variety of household sizes and types.	▪ 3.1.1.E: Low to Moderate Inclusionary Ordinance ▪ 3.2.1.A: Density Bonus Ordinance Update ▪ 3.6.5.A: Removal of Constraints to Multi-Family Housing in Areas of Opportunity ▪ 3.6.5.B: Enhanced Housing Choices and Affordability in Areas of Opportunity	**High** These programs focus on increasing housing options for lower-income families. Lack of affordable housing inventory is a high contributing factor to the lack of housing options for lower-income families.
Disproportionate Housing Needs/ Displacement	*Risk of Displacement/Displacement due to High Costs:* Lower and moderate households may face displacement pressures as rents rise due to high overall housing costs.	▪ 3.2.3.A: Affordable Housing and Services Fund ▪ 3.2.4: Rental Assistance programs ▪ 3.6.7.B: Department of Homeless Solutions and Equitable Communities ▪ 3.6.7.C: Housing Rehabilitation Resources ▪ 3.6.7.A: Pilot Program to address homelessness in North County ▪ 3.5.7.E: Mobile Home Park Preservation	**High** Displacement due to high housing costs is a high contributing factor to disproportionate housing needs.

Table 6-I-14, continued

Identified Fair Housing Issue	Contributing Factor	Program to Address	Priority (high, medium, low)
Outreach	*Lack of Language Access:* Outreach and education about fair housing issues and public decisions may not always be accessible in multiple language	▪ 3.6.2.A: Fair Housing Services ▪ 3.6.7.D: Participation in Decision Making Process	**Medium** This is a medium contributing factor impacting fair housing and civil rights compliance.
Segregation and Integration	*Private Discrimination Against Protected Classes:* Discrimination against protected classes (in violation of Federal Housing Law) directly limits housing choice and mobility.	▪ 3.6.2.A: Fair Housing Services ▪ 3.6.3.A: Fair Housing Enforcement, Random Testing	**High** This is a high contributing factor impacting fair housing and civil rights compliance, as it is a factor that directly creates conditions of discrimination and limits housing choice.
Segregation and Integration	*Land Use and Zoning Laws:* Limits on multi-family housing and density may create situations of concentrated density and poverty.	▪ 3.1.1.E: Low to Moderate Inclusionary Ordinance ▪ 3.1.1.D Diversity of Land Use Designation and Building Type ▪ 3.1.1.F Objective Design Standards ▪ 3.6.5.A Removal of Constraints to Multi-Family Housing in Areas of Opportunity. ▪ 3.6.5.B Enhanced Housing Choices and Affordability in Areas of Opportunity	**High** Lack of multifamily housing development within high resource areas is a high contributing factor to the lack of neighborhood integration. These programs will review the zoning ordinance to further opportunity for a mix of housing types throughout communities.

Table 6-I-14, continued

Identified Fair Housing Issue	Contributing Factor	Program to Address	Priority (high, medium, low)
Access to Opportunity	*Community Opposition to New Housing:* Community opposition to new housing has led to appeals and litigation that make producing new housing riskier and more expensive. This limits housing choice in the unincorporated areas.	▪ 3.5.1.A – Public Education Program	**Low** The County has faced significant community opposition for certain housing developments, often in high resource areas. This community opposition has led to litigation, creating expense and uncertainty for homebuilders. While community opposition does exist, most projects do not attract significant opposition. Therefore, this contributing factor is a lower priority for AFFH implementation.

REMOVING IMPEDIMENTS

Since the publication of the AI report, the County is taking steps to remove impediments to Fair Housing Choice. The County further addresses these impediments by contracting with LASSD. LASSD conducts fair housing testing on a quarterly basis and assists with fair housing outreach through public seminars, various medias and publications, website operation and participation in other regional fair housing efforts. Various services are implemented through this partnership including:

- Providing tenant/landlord counseling to all citizens;

- Responding to all citizens complaints regarding violations of the fair housing laws;

- Promoting community awareness of fair housing rights and responsibilities;

- Monitoring fair housing legislation, attending training and reporting to the County; and

- Serving as an overall fair housing resource for the area, including implementation of an affirmative fair housing market plan.

No policies or programs in the Housing Element have been identified as barriers to fair housing practices in the County. In addition to federal fair housing laws, existing County policies and programs are already in place to increase affordable housing options, as well as ensure the

provision of housing to many different population groups, including persons living with disability, large families, farmworkers, and persons who would benefit from supportive and/or transitional housing. The Housing Element programs have been amended and expanded to include place-based recommendations, measurable outcomes, and specific action timelines. The new Environmental Justice Element also includes a number of complementary goals, policies and implementing programs that also affirmatively further fair housing. The implementation of identified programs would further existing fair housing practices by expanding outreach strategies to include populations that live on lower household incomes and/or those who would be more receptive through Spanish language communication.

Additionally, while the AI lists several impediments to fair housing in San Diego County, the County is working separately to address some impediments and contributing factors, and will address the remainder through implementing programs of this Housing Element. As for the regional impediments noted in the AI, AFFH programs in this Housing Element will work to increase fair housing practices such as outreach and education through social media and providing resources such as fair housing counseling and mediation, including targeting populations that have historically had fewer housing choices; promote equitable employment, and continue existing work with LASSD. Furthermore, the County will continue to plan and implement place-based improvement strategies to facilitate investments in infrastructure, housing, and business in areas identified as communities of concern. Finally, the County will propose amendments to its zoning code and development procedures that increase residential opportunities in high resource communities, further expanding fair housing choice.